War against Corruption and the Whistle-blowing policy the Nigerian experience: 2015-2019.

By

Abraham Owugbosia Stewart, PhD
Department of Political Science,
Faculty of Social Sciences,
Ignatius Ajuru University of Education,
Port Harcourt.

Abstract

The focus of this study is to examine how the whistle-blowing policy in Nigeria has facilitated the fight of corruption in Nigeria within the period 2015-2019, and to see how the whistle-blowing policy is different from other strategies used for the fight of corruption, how this policy have further help to discouraged corrupt practices in Nigerian public life within the period under review. Theoretically, this paper adopted the universal dignity theory of whistle-blowing theory as its theoretical framework; the study relied solely on secondary data which has qualitative information. The objective of this study is to carefully look into the problems facing the whistle-blowing policy in the fight of corruption in Nigeria within the period under review. The study will therefore conclude that legal framework and institutional limitations as to how to enhanced the fighting of corruption are not enough to curtail drastically corrupt practices and activities in Nigerian state, and make appropriate recommendations to strengthen the policy of whistle-blowing for the fighting of corruption, for example, vigorous media enlightenment campaigns, establishment of special anti-corruption courts will specifically help tremendously to strengthen the fight of corruption in Nigeria.

Keywords: **Corruption, Whistle-blowing policy, Fight, Public Officer**.

Introduction:

Corruption is an inevitable consequence of the development and modernization processes. Corruption erupts when the agents in the discharge of his official duties, compromise the interests of the principal. The agent contravene the stipulated procedures streamlining his conduct by illegally appropriating public resources for his personal use or indulging in illegal taxation of private economic activities in an attempt to obtain extra-legal income. Also the looting of public treasury and brazen mismanagement of public fund at the expense of more vital infrastructural projects such as potable drinking water, electricity, hospital, schools and good roads are sources of dishonesty and injustice amounting to unilateral and concerted abuse of office thereby contravening the national and public interest in Nigeria. This is why David Cameron described Nigeria and Afghanistan as "fantastically corrupt" country of the World in May, 2016.

However, corruption did not originate from Nigeria and can be partly traced to our historical experiences in the hands of our colonial masters (Britain) whose main agenda was that of foisting on Nigeria and Nigerians a distorted polity and a bifurcated society that is incapable of evolving into nationhood; a Nation state which diverse primordial sentiment and cleavages will hold sway leaving the people deeply divided continually thus perpetually incapable of taking its glorious place in the comity of nations; nation that will be unable to serve as the ultimate driver of the Africa vision in the global arena Amannah & Adeyeye, (2018, p. 9). The colonizers did not only institute corruption in Nigeria, they also created a distorted political process which has led to the various problems the country faces today. The colonial masters also used, and are still using, their multinational corporations to introduce influence peddling as a means of circumventing official policies and regulations in their favour, Jimoh, (2016, p.67).

Basically, since the election and inauguration of President Buhari, has made it clear that the fight against corruption will be a priority of his government. In line with this, the administration had set up a presidential committee on anti-corruption headed by renowned legal icon, Professor Itse Sagay. The mandated of the committee include, among others, to formulate a strategy and co-ordinate the anti-corruption war of the administration ensuring that all sectors of the Nigerian society are involved in the fight, Otunuga, (2016, p. 55). It is therefore against this backdrop that the objective of this study is to investigate the whistle-blowing policy and how it has assisted in the fight against corruption in Nigeria within 2015-2019.

It is a fact that corruption is the surest route that hinders development in any society. Although, some scholars have argued that corruption could trigger development. However, despite this ambivalence, there is widespread condemnation of corruption in all ramification and hence a Worldwide call for eradication of the scourge.

In Nigeria evidences have shown that corruption does more harm than good. This is because, despite the fact that Nigeria has abundant natural resources, the country is still classified among the poorest countries in the World because resources that should have been used for development is frittered away through corruption, this consequently lead to 54% of the country's population lives on less than $1 per day Nmah (2017, p. 118).

Corruption is undoubtedly one of the greatest challenges in Nigeria. It is a challenge that is not only leading to impoverishment and loss of lives, but also threatening the stability of the country. The fight against corruption in the public sector is the beginning of wisdom. In January, 1966 the military identified corruption by politicians as one of the reason for their intervention and untimely termination of the First Republic. Since then successive governments have been waging war against the menace. (Otunuga, 2016).

Before the present administration, preceding administrations in Nigeria had successively instituted legal instruments, measures and policies designed to combat corruption in the country. According to Enweremadu, (2012, p. 44), during the administration of former President Obasanjo, (May 29th 1999-May 28th 2007), corruption campaign was pursued through different processes and directed to achieving a number of objectives, three of which are most perceptible.

The first was to bring about a sharp drop in the incidence of corruption, through the speedy arrest and prosecution of corrupt public officials. This was to be achieved through the establishment of new anticorruption agencies, the Independent Corrupt Practices Commission (ICPC) inaugurated on the 29th of September, 2000 and the Economic and Financial Crimes Commission (EFCC), in 2004. Previous experience has shown that such institutions, which have produced relative successes in some countries, were not easily adaptable to Africa – especially to Nigeria specifically, where the necessary administrative capacity (adequate funding, quality manpower, strong laws and efficient judicial system) and strong political will and support are often lacking, and prevailing political logic tends to favour the abuse of office and misappropriation of public resources, Wairi-Ali, (2017, P.4)

The second objective was to reduce or remove incentives for corruption among public officials via a comprehensive reform of the public sector (including the judiciary). Specifically, the reforms aimed at the following: eliminating monopoly, by privatization and deregulation; reducing discretion, by the streamlining of functions and reinforcement of controls; and removing administrative opacity, by the increasing of transparency and accountability, particularly in public revenue collection and expenditure. The aggressive implementation of these policies, it was hopes, would reduce the opportunities for corruption among public officials. Some aspects of these reforms privatization, reform of the management of public

finance, and the adoption of a new policy on employment and compensation (also known as "professionalization" and "rightsizing") in the public service – were pursued with considerable vigour. But their cumulative effect on corruption has proved difficult to see. Nyoni (2018, p. 3).

The third objective was to redress some of the worst consequences of past corruption on the economy and improve the financial health of the nation. This goal was to be achieved through identification of some of the offshore bank accounts and asserts – landed properties, companies, shares, and so on – owned by corrupt Nigerians and ensure they were duly confiscated and the proceeds repatriated. These remedial measures did not achieve the desired results to prohibit and prescribe punishment for corrupt practices. The corrupt practices and other related offences Act of 2000 was the first to be passed into law by the Obasanjo's administration. Uniamikogbo, (2007, p. 24).

Unfortunately, certain factors have continue to undermine the effectiveness and integrity of the anticorruption crusade. For example, the use of the anti-craft agencies to witch-hunt perceived oppositions to government in power, this was the case between 1999 to 2007. Also, the agencies were under – funded, thereby making it rather difficult for them to effectively prosecute those accused of graft. Above all, was the interference from the powers that be as well as the issue of immunity clause hampered the operation of the agencies significantly. This was because, the immunity clause made it impossible for ICPC and EFCC to take action against serving governors even when the agencies have incriminating evidence against them. (Otunuga, 2016).

EFCC, in its annual report of 2012 observed the corruption in the public sector remains a sore spot in Nigeria's quest to instill transparency and accountability in the polity. The failure to deliver social services, the

endemic problem of the power supply and the collapse of infrastructure are all linked to corruption, Olaniyi and Abubakar, (2015, p. 161).
On 29thMay, 2015 when president Buhari took over as the civilian Head of State and Commander in Chief of the Nigerian Arm Forces, vowed to combat corruption in Nigeria no matter whose ox is gored. He started the anti-corruption campaign by arresting Col. Sam Dasuki (rtd.), the untouchable then national security adviser of erstwhile president Jonathan. He also instituted the whistle-blowing policy to ensure that no stone was left unturned in the war (Amannah and Adeyeye, (2018, p. 12). Thus, this study is to critically determine to examine the whistle-blowing policy as an anti-corruption strategy and will try to evaluate the effect of the policy on corruption within the period under review.

Significantly, this study tends to achieve the following, to assist students to understand clearly the concept of whistle-blowing policy and its resultant politicization. The study will also inform the general public on the issues handled as a result of the whistle-blowing policy. This study will help subsequent government and administrations to either follow the footstep laid down now or propose additional measures to want that had been done. Finally, this study will help subsequent government to see the need to come up with effective legislations thereby instituting technical and appropriate policies to fight corruption in Nigeria.

Whistle-Blowing:
Historically, whistle blowing is an age long approach of revealing information or passing massage of warning to the public. Johnson, (2003, p.56), had however, averred that its origin is not very clear. The term "whistle-blowing" or "whistle-blower" can be traced to the United State to mean the "practice of English cops who would blow a whistle when they was a crime being committed" (Cavilo, 2004, cited in Sehgal, 2014, p. 2). However, the idea of "whistle-blowing policy" is traced to 1863 in response to fraud within the public sector especially the unscrupulous actions by the

contractors/suppliers of items like horses, rifles and ammunitions, medicines, provisions, etc during the American civil war (1861-1865) which led to the enactment of federal false claims Acts (1862 12 Stat, 696) under the administration of president Abraham Lincoln, Dauda, (2016 p. 393). This enactment came with both the protection and reward for whistleblowers. Another legislation known as the "US Whistleblowers protect Act" was later enacted in 1989 and amended in 1994, Sehgal, 2014 p.2).

Whistle blowing has become a very crucial tool increasingly used all over the World to prevent and detect wrongdoings or misconducts, particularly economic and financial crimes. It is a term greatly associated with raising alarm (as when the referee blows the whistle to alert the participants in a game that a foul is committed) Schultz and Harutyunyan, (2015, p. 8). Similarly, blowing a whistle is also likened to how people or group are alerted about something dangerous or a potential threat, Rachagan and Kuppusamy, (2013, p. 20). In Nigeria households are encouraged to get a whistle device to alert their neighbours of potential threats or when danger or in need of assistance, Ogungbamila, 2014, p. 34). This explains the philosophy of such para-military voluntary organizations as the Boys Scout and the Boys Brigade, Nigeria always bearing a whistle.

For this study, whistle-blowing is defined as a deliberate and voluntary act of revelation made by an individual (whistleblower) who is a member of a particular organization or society, or who has access to information about the unlawful activity of a particular organization or group to the public or authority for the purpose of rectifying the misconduct. Whistle blowing has also been defined as "the reporting of a wrongdoing that needs to be corrected or terminated in order to protect public interest" Asian Institute of Management,(2006, p. 15). This definition has further added the concepts of correction and termination to the interpretation of whistle blowing. This

means that, when s crime is reported through whistle blowing, that crime is assumed to be error, which should be corrected and never to be repeated. According to Onakoya & Moses (2016, p. 86), whistle blowing is raising concern about a wrongdoing within an organization; the concern which must be genuine one about a crime, criminal offence, miscarriage of justice, dangers to health and safety and of the environment and/ or the cover-up of any of these. Sule (2010, p.40), argued that whistle blowing involves speaking out publicly or to the authorities concerned about any wrongdoing, which may rang from financial scandal or cheating, corruption or mismanagement to health and safety issues that may bring about the decline or total collapse of the organization or an immeasurable danger to the public, if necessary steps are not taken. The argument of Sule agrees with the view expressed by the Asian Institution of Management, which brought in the issues of correction and termination. Sule agreed with this view when he said "if necessary steps are not taken". In this they are both saying that when a whistle is blown against a crime, there should be an expedite action to ensure that wrongdoing does not continue. According to Transparency International, (2012, p. 1), whistle blowing is the "disclosure of information about perceived wrongdoing in an organization, or the risk thereof, to individuals or entities believed to be able to effect action". TI has emphasized the action aspect of the practice to mean that; whistle blowing is not complete if the right entity fails swing into action. More explicitly, Jubb (1999, p. 78) views whistle blowing as "a deliberate non-obligatory act of disclosure, which gets onto public record and is made by a person who has or had privileged access to data or information of an organization, about non-trivial illegality or other wrongdoing whether actual suspected or anticipated which implicates and is under the control of that organization, to an external entity that has the power to rectify the wrongdoing". Whistle blowing generally entails four key characteristics:

a) It involves an act done by a person who reveals information to the public;

b) The information is revealed to a party who is an outsider to the organization and who often will take action on it;
c) The information is related to unlawful activity within an organization; and
d) The person disclosing the information is an employee/member or had been an employee/member of the organization. Johnson, (2003, p.10).

Whistle blowing can be internal or external. It is internal when a person reporting the misconducts is within the organization or institution reporting to fellow colleagues or superiors; while it is external when the misconduct is reported by outsiders e.g. law enforcement agencies, regulators, and media among others. Sehgal, (2014 p.6)

The purpose of whistle blowing policy is premised on the fact the people, authorities and organizations can police themselves, check, detect and correct illegal, unethical and inappropriate behaviour of certain element in their society or organization by ensuring such behaviuors are reported and made public in order to ascertain the magnitude or extent of such wrongdoing and the implications on the polity. Whistle blowing is thus a channel through which the excesses in the political system could be exposed and corrected. Whistle blowing is also different from making complaints and submitting a written petition to the authority in reaction to grievances ensuring from quarrel or misunderstanding among members of an organization. In involves disclosing information in good faith and for public interest. Individuals that blow the whistle (whistleblowers) are usually protected against retaliation and sometimes rewarded. Baniser, (2011, pp.18-19)

Personal Whistle-blowing:
When an individual discloses information about misconduct that personally affects him/her, usually at work.

Impersonal Whistle-blowing:
This is when a member of an organization reports wrongdoing that is harmful to other members or the organization. De George, (2010, p. 91)

Government Whistle-blowers: This is public servants who reveal malpractices committed by their colleagues or superior officers. **While Corporate Whistleblowers** are members of corporate bodies or private enterprises who disclose information about violation of the statutory regulations by their employer. Lewis, (2001 p. 101) Oakley and White (2006 p. 80) submitted that anti-corruption campaigns may not be successful without effective whistle blowing. It was based on this that the Nigerian government in 2016 formulated and adopted the whistle blowing policy as a mojar policy tool in its fight of corruption.

Corruption:
For the purpose of this paper, corruption is the betrayal of trust resulting directly or indirectly from the subordination of public goals over those of the individual. Gire (1999, p. 4). Transparency International (2007) defined corruption as "the abuse of entrusted power for private gain" at three levels; petty (management level) grand (leadership level) and political (systemic level). Corruption is a form of dishonest and unethical conduct by a person entrusted with a position of authority, often to acquire personal benefits. Corruption is derives from the Latin word "corruptus" meaning "to spoil, pollute, abuse, or destroy depending on the context, Adesinna, (2016, p.2). The word "corrupt" when used as an adjective literally means "utterly broken".

Like many other complex phenomena, it is difficult to find a one-for-all definition of corruption. The literature contain many definition of corruption as scholars either seek a comprehensive term or focus on a single aspect of it. Although this work is not to pay attention to corruption but to have a good knowledge of the word. Hence, Preye and Weleayan, (2011 p.

47) view corruption as the pervasion of integrity of state affairs through bribery, favour or moral depravity. In general, corruption is most commonly defined as the misuse or the abuse of public office for private gain as in the definition by World Bank (1997) and UNDP (1999)

Kind of Corruption:

There are numerous kinds of corruption in the World over, but this work will only consider the four-fold classification according to Shah (2007)

a) **Petty corruption**: This involve individual public officials who abuse their offices by demanding bribes and kickbacks, diverting public funds or doling out favours in return for personal gratification;

b) **Grand Corruption**: This refers to the theft or misuse of vast amount of resources by state officials, including politicians and government bureaucrats;

c) **State or regulatory capture and influence peddling**: This is a situation where private individuals collude with public official or politicians for their individuals and mutual benefits; and

d) **Patronage, paternalism, clientilism and being a team player**: This is a situation where public officials use their official position to provide assistance to clients or colleagues from the same geographic, ethnic, or cultural origin in order to enable them to receive preferential treatment from the public sector.

Agenyi and Ameh (2009, p. 129) identified some of the forms of corruption common in Nigeria to include the following:

a) Intentional distortion of financial records;
b) Misappropriation of asserts whether or not accompanied by distortion of statement;
c) Payment for contracts or jobs not executed;
d) Collection of 10% kick back from contracts awarded;
e) Intentional loss of receipt and mutilation of account documents;
f) Insertion of fictitious names in the payment voucher and the amount involved paid to unauthorized persons;
g) Using government official letter head paper to order for goods for private use purporting that it belongs to government;
h) Paying public cheques into private account for any reason best known to the officer;
i) Paying twice the cost of item(s) using the same document;
j) Leaving ex-employees on the pay roll and collecting the said amount for private use;
k) Charging the public or students unauthorized fees that are not utilized for the supply of any material for the institution;
l) Doctoring marks for students for personal reasons;
m) Asking and receiving cash or material before approving projects;
n) Having carnal knowledge of opposite sex before transacting business;
o) Receiving cash or kind to write project for students;
p) Disposal of any government asserts without due approval;
q) Auctioning government property to one self at little or no cost;
r) Doling money to people to allow you stay in office for another term;
s) Over-inflating the cost of items purchased for the public;
t) Diversion of worker's salaries and allowances for personal use.

Others not included are: bribing policeman, bribing electricity workers, bribing to collect international passport, bribing to collect voter's card, fuel subsidies scam etc.

In realization of the consequences of corruption in Nigeria, government at different times came up with relevant measures in order to curb the menace. These measures range from enactment of laws to establishment of institutions to fight corruption in Nigeria. For example, Murtala Muhammad administration established the code of conduct bureau for public officers in 1976. There was Jaji declaration in 1977 by Obsanjo military regime, the Ethical revolution of Shagari civilian administration (1981-1983), War against indiscipline (WAI) of Buhari/Idiagbon regime (1984-1985), War against indiscipline and corruption (WAIC) BY Sani Abacha regime in 1996. Other effort include setting up of probe panels, commission of enquiry and tribunals to prosecute corrupt individuals. Haruna, Amina and Maria, (2014, p. 20)

Theoretical framework:

This study adopted the Universal Dignity theory of Whistle blowing (UDTW). This theory was propounded by Hoffman and McNulty (2010). The decision to blow the whistle is usually a very dangerous one. This is because, the whistle blower may be exposed to several harm and all kinds of risks as retaliation. The question that arise is what should motivate an individual to blow the whistle or report an act of misconduct in his/her organization or environment, even at the risk of reprisal and unpleasant consequences?.

Universal Dignity theory of Whistle-blowing (UDTW): Richard De George's seminar work on business ethics and whistle blowing in organization, published in 1986, UDTW explain the morality of whistle blowing from a stakeholder's perspective. De George (1986) holds the view that it is a fundamental and moral obligation of business to avoid or prevent harm to society, he argued that there are circumstance when external whistle blowing by employees may be "morally prohibited", "morally permitted" and "morally required". James (1990 p. 293). In his view, external whistle blowing is an act of dissent or disobedience to

organizational ethos and must be justified by sound ethical considerations to be permissible or mandatory. Thus, it is "morally prohibited" to blow the whistle when there is no evidence of any intended harm to the society or where the whistle blower provides false or fictitious information out of malice or vengeance. According to De George (1986), cited in Hoffman and McNulty (2010, p. 47) the criteria for permissible whistle blowing are as follows:

a) The firm, through its product or policy will de serious and considerable harm to the public whether in the person of the user of its product, and innocent by stander or the general public;
b) Once an employee identifies a serious threat to the user of a product or to the general public, he or she should report it to his immediate supervisor and make his or her moral concern known. Unless he or she does so, the act of whistle blowing is not clearly justifiable; and
c) If one's immediate supervisor does nothing effective about the concern or complaint, the employee should exhaust the internal procedures and possibilities within the firm.

The conditions proposed for ethical whistle blowing according to Hoffman and McNulty (2010, p.52) UDTW are as follows:

a) Compelling evidence of nontrivial illegal or unethical actions done by an organization or its employees that are deemed to violate the dignity of one or more of its stakeholders;
b) A lack of knowledge within the organization of the wrongdoing or failure by the organization to take corrective measures. if this justificatory conditions were met, whistle blowing would be ethically called for unless the exempting conditions from whistle blowing prevailed; and

c) One would be conditionally exempted from the duty to blow the whistle if one had credible grounds for believing that by doing so one would be putting oneself or others at risk of serious retaliation.

The relevance of the theory to the study:

a) The question of motivation is necessary because it is an ethical matter and unless there is an acceptable moral threshold that justifies the motivation to blow the whistle, it may be difficult to widen the scope of public participation or sustain public support for the policy going forward.
b) The whistle blower is required to blow the whistle only when he/she is convinced that doing so has the potential to bring about desirable change and only when such an action is worth the risk that he/she may be exposed to.
c) The safety and protection of the whistle blower must be placed above the responsibility to go public.

Given the peculiarity of the Nigerian case and the novelty of the policy, it is obvious that the concern for safety may be a key consideration for whistle blowers who may want to report acts of misconducts to the appropriate authorities. Therefore, how the policy addresses this problem may constitute a major determinant of its success.

The Whistle-blowing policy in Nigeria:

One thing is peculiar about corruption, which is the fact that information about corruption rarely come to light, except it is reported by one of the parties involved, usually a person or group not favoured or cheated in the deal or when some people uncover certain irregularities in the course of their duties Transparency International (2010). Thus, investigating and gathering evidence to prosecute corruption cases most times require a third party (whistleblower) who have access to vital information and who is

willing to disclose it in good faith. This notion of third party necessitated the call for the adoption of the whistle-blowing policy in Nigeria.

Adoption of Whistle-blowing policy in Nigeria:

The recent adoption of the whistle-blowing policy by the Buhari administration is not the first in the history of Nigeria. In 2012, the Central Bank of Nigeria (CBN) issues a document tagged "code of corporate governance for banks and discount house and guidelines for whistle-blowing in the Nigerian banking industry" (revised 2014) for banks and other financial institutions in Nigeria with the aim to "provide stakeholders and employees the opportunity to report acts that may constitute a fraud, unlawful behaviour or failure to comply with bank related directives, encourage and further uphold good corporate governance practices and maintain consumer confidence", Adeyemo, (2015, p. 144). The guideline further provides that the Board of Directors of banks and other financial institutions are required to implement a whistle-blowing policy and thus ensure the anonymity of the whistleblower. For example, section 4.0 of the guideline provides that "no bank, or financial institution shall subject a whistleblower to dismissal, redundancy, termination, undue influence, duress, withholding of benefits and any other act that may have a negative impact on the whistleblower" (CBN, 2014). Despite of the fact that the guidelines provide the protection for whistleblower, it failed to provide way out in the case that a whistleblower faces any of the above challenges , Adeyemo (2015, p. 144).

However, there have been series of clamoring for the adoption of whistle-blowing policy and whistleblower protection law in Nigeria. For example, some legal practitioners recently advocated for the enactment of a law to legislate whistle-blowing in Nigeria. They argued that the whistle-blowing policy if enshrined in our law book and adopted will "keep people on their toes rid the country of corrupt individuals, check and regulate excesses in the system". They maintained that the absence of a strong legal structure to

protect whistleblowers has made it difficult to promote good corporate governance.

Instances of Whistle-blowing policy in Nigeria:

Following the federal government's introduction of the policy of whistle-blowing as a means of recovering looted funds several cases of public misappropriation of funds have been unraveled. Banks has no choice but to expose the real owners of some bank accounts which are previously unknown, Chima, (2017, p.73). With this development in Nigeria, the federal government treated many cases of blowing the whistle; noticeable among them are as followings:

a) The present Emir of Kano, the former governor of Central Bank of Nigeria (CBN), Alhaji Sanusi Lamido Sanusi, who alleged that some funds were missing from the state oil corporation in 2014. He also claimed that over $20 billion of Nigeria's treasury were unaccounted for. He was later suspended by the then president Jonathan, stating that the reason for the suspension was due to financial recklessness, fraud and fiscal misconduct. Olawoyin, (2017, p. 112)
b) The guardian newspaper of Thursday 20th October, 2016 reported a perfect instance of whistle-blowing where a staff member of the Hope for Women in Nigeria Initiative (HOFOWEM) reported the looting of 300 million naira meant for the alleviation of women in the rural areas by top official but she was dismissed.
c) Another report was published by a staff member of the ministry of aviation revealed high graft in the ministry, he was not only sacked but his life was highly at stake. Etemiku, (2016, p. 70).
d) The biggest amount of $136,676,600.51 was recovered from an account in a commercial bank, where the money was kept under a fake account name. (New Agency of Nigeria 2017).

e) The discovery of some huge amount at Ikoyi estate is a worthy of mention, the total amount recovered from the house was $9.2million, (Gabriel, 2017).
f) The sum of $229,000 and ₦800,000 was in the ministry of foreign affairs by Thompson, an assistant director in the (New Agency of Nigeria 2017).

According to this day Newspaper, "the federal government has disclosed that the total number of cases of fraud and illicit transactions by serving or former public officers which is currently investigating under its whistle-blowing policy has risen to 2,251" (Chima, 2017, p. 73). A breakdown of this according to ministry of finance showed that 95 of such cases were reported using the whistle-blowing website; 1,55o through a dedicated telephone line for the policy; 194 through e-mail sent by the whistleblowers; 412 through text messages. Further more, the report put the number of tips received so far at 282. The breakdown showed that 49 were through calls; 87 through SMS; 95 through the website that was developed for the initiative; 51 through e-mails and actionable tips received were put at 154" (Chima, 2017)

With the above, it is obvious that, until recently, several cases of the whistleblowers treated by the Nigerian government were not handled as some of the cases backfire on the whistleblowers themselves.

It is important to present in specific terms some of the achievements of the policy as a result of its effectiveness as reported by Bamgbose, (2017, pp. 104-141)

a) EFCC unraveled a staggering $43.4 million (about ₦14 Billion) warehouse inside the infamous apartment 7b Osborne tower, Ikoyi, Lagos State Nigeria, allegedly belonging to a former managing-director, operations NNPC, Mrs. Esther Nnamdi-Ogbue.

b) Prior to this, the EFCC also uncovered bundle of naira notes totaling about ₦450 Million inside big bags at shop LS64 Legico plaza Nigerian air force camp, Victoria Island Lagos State.
c) ₦250 million was hauled from the popular Balogun Market, also in Lagos.
d) ₦49 million cash that was reclaimed by the EFCC at the Kaduna airport.
e) Controversy has reported arisen over the ownership of 38 million US Dollars, 27, 000.00 Euro and 23 million naira discovered by the operatives of EFCC in a private resident at Ikoyi Lagos State.
f) A whopping $9.8 million (about 3billion naira) was recovered from the former gropu managing director of NNPC, Mr. Andrew Laah Yakubu on 3rd February, 2017.

Conclusion:

This study having examined the effectiveness of the whistle-blowing policy of Nigeria within the period under review, reiterates the fact that corruption is a hidden crime that is difficult to detect except it is reported, hereby conclude the study as follows:

Evidences presented in the study showed that the conventional legal and institutional framework is not enough to curtail corrupt activities in Nigeria. Surprisingly, most of these corrupt activities are perpetrated by people entrusted with public responsibilities who ordinarily should protect public interest.

The whistle-blowing policy has over the years become an important instrument widely used in both developed and some developing societies to fight corruption. Hence, the adoption and introduction of whistle-blowing as a tool for detecting and fighting corruption in Nigeria is a welcome development and should be strengthened.

Finally, the study found that perfect political will, passage of the whistle-blower protection bill, and good governance among other things will help boost the effectiveness of the whistle blowing policy toward fighting and reducing the menace of corruption in Nigeria.

Recommendations:

a) The federal government should continually ensure that EFCC, ICPC, among others are strengthened to timely and vigorously prosecute corrupt offenders.

b) The leadership of these anti-graft agencies must be carefully selected with the right caliber, selfless, full of integrity and unquestionable character.

c) The use of the anti-graft agencies to hunt the opposition to government or get at political opponents or outright enemies will spell doom on the anticorruption war therefore should be jettisoned.

d) The government should embark on vigorous enlightenment campaigns in the mass media (televisions, radios, newspapers, social media etc.) to educate the citizens against the evils associated with corruption and its consequent.

e) A good reward system and protection should be put in place for whistleblowers who give correct information that lead to recovering of looted funds.

f) The government should establish special anti-corruption courts which would then serve as alternative to the normal courts to quicken and give a sharp bite to the prosecution of corruption cases.

g) If the whistle-blowing policy objectives are to be effectively actualized, there is need for autonomous, uncorrupt and uncompromised judiciary in Nigeria, hence the sanitization of the judiciary is imperative.

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