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Beyond the Whistle; Driving the Governance Agenda

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Whistleblowing is the disclosure of information by employees, contractors, or other stakeholders about illegal, unethical, or improper conduct within an organization. It is an important mechanism for promoting transparency, accountability, and integrity in both public and private sector institutions. Through whistleblowing mechanisms (whether internal channels or external authorities), individuals can report concerns such as fraud, corruption, financial mismanagement, regulatory breaches, or other misconduct.

In Nigeria, whistleblowing framework is supported by policy initiatives and related anti-corruption frameworks aimed at encouraging the reporting of misconduct. The Federal Ministry of Finance introduced the Whistleblowing Policy in 2016 to strengthen the fight against corruption by providing channels for confidential reporting and, offering financial incentives where credible information leads to recovery. The policy covers concerns such as fraud, bribery, mismanagement of public funds, financial malpractice, and violations of financial regulations. Other sectoral/ non-sectoral codes and laws such CBN[1] Codes, ISA[2], FOIA[3], CPA[4] etc. also contain key whistleblowing provisions.
Relevant institutions, including the ICPC[5] and the EFCC[6], play important roles in investigating reported cases and enforcing anti-corruption measures.
However, Nigeria's whistleblowing framework remains largely fragmented, while protections for whistleblowers are constrained by the lack of a comprehensive legal structure and further weakened by gaps in implementation.

In Ghana, whistleblowing is governed by the Whistleblower Act, 2006 (Act 720), which provides a formal legal framework for disclosing improper conduct and protecting persons who make such disclosures. The Act sets out the procedures for reporting, the persons or institutions to whom disclosures may be made. It also prohibits victimization and retaliation against whistleblowers, provides mechanisms for protecting their identity and in certain instances allows for the provision of rewards for disclosures made.
However, challenges with this framework include a narrow scope of reporting, inadequate protection for whistleblowers, and limited awareness and support.

While the regulatory frameworks in both countries have limitations, they reinforce a critical point: whistleblowing is essential to strengthening governance, improving public sector accountability, and promoting ethical conduct across institutions.

1. Central Bank of Nigeria
2. Investment and Securities Act
3. Freedom of Information Act
4. Corrupt Practices and Other Related Offences Act
5. Independent Corrupt Practices and Other Related Offences Commission
6. Economic and Financial Crimes Commission

For forward-looking organisations, whistleblowing is no longer merely a crisis management tool; it is a core pillar of corporate governance and strategic risk management.

A well-designed whistleblowing framework strengthens ethical culture, builds stakeholder confidence, and gives employees the confidence to raise concerns without fear of retaliation. This openness supports trust, accountability, and responsible behaviour at every level of the organisation.

Five Characteristics of a Governance-Grade Whistleblowing Programmeme

1. Independence without Compromise:
   The reporting channel should be structurally independent of the organisation's internal management hierarchy. Reports should not be routed through functions whose senior members may be implicated in disclosures or who report to senior management. Independence is not optional, it is the foundation of credibility.

2. Anonymity by Design
   Effective programme guarantee anonymity at both technical and procedural levels, not merely as a stated policy. Whistleblowers should not be required to identify themselves (it should be optional), reports should be redacted before escalation; and no information that could identify the reporter should be transmitted.

3. Multi-Channel Accessibility
   People report through the channels that they find most accessible and least intimidating. Best-in-class programme offer multiple options including, telephone hotlines, web portals, email, and SMS. Restricting reporting to a single channel can exclude employees/ stakeholders with critical ground-level insight into operational misconduct.

4. Structured Case Management
   A report that goes nowhere is worse than no report at all because it erodes trust in the process. Governance-grade programme require clear triage protocols, defined investigation timelines, independent oversight of the case management process, and systems that enable the tracking and management of disclosures from the point of receipt to resolution.

5. Strong Anti-retaliation and Consequence Management
   Organisations should establish clear policies that explicitly prohibit retaliation including dismissal, harassment, discrimination, or intimidation against individuals who report concerns in good faith. They should also apply consistent consequences for substantiated misconduct and any acts of retaliation. Adopting a visible zero-tolerance approach to misconduct and retaliation builds confidence in the process and encourages employees to speak up.

Take the next step in strengthening your organisation's whistleblowing framework. To learn more or subscribe, visit tip-offs.deloitte.com.ng or contact our Risk Regulatory and Forensic team at cnnite@deloitte.com.ng or cokadigbo@deloitte.com.ng.

Deloitte Risk, Regulatory and Forensic Leaders



Kofi Awuah
Partner

Profile Summary

Kofi Awuah is currently the Risk, Regulatory and Forensic Partner for West Africa. He has over 15 years' experience in Risk Management.

He has worked and delivered transformational projects to global and regional clients in in financial services, telecom, oil & gas, manufacturing and public sector.

Kofi has both industry and practice experience working as an ex-banker in one of the leading banks in Nigeria.



Chiazo Okadigbo
Associate Director

Profile Summary

Chiazo is an Associate Director within the Deloitte Risk, Regulatory and Forensic Practice. She has over 15 years of experience in fraud and misconduct investigations, anti-corruption and anti-money laundering reviews, and other forensic services.

She is a lawyer and a member of the Association of Chartered Certified Accountants (ACCA).



Chinonye Nnite
Manager

Profile Summary

Chinonye is a Manager within the Deloitte Risk, Regulatory & Forensic Practice. Through Deloitte Tip-Offs Anonymous, she is committed to helping organisations create safe and transparent workplaces where everyone feels empowered to raise concerns.

Her focus is on supporting clients to implement effective whistleblowing systems, protecting both their people and reputation, ensuring that every workplace is ethical, secure, and resilient.



Monita Derby
Manager

Profile Summary

Monita is a Manager within the Deloitte Risk, Regulatory & Forensic Practice. She plays active roles in Internal audit, internal control reviews, ERM, compliance reviews, forensics audits, automated controls testing and data analytics leveraging ACL and Power BI.

She has expertise in policies and procedures review and risk assessment of clients in the financial service, telecommunication, hospitality, public sector and energy & resource industries.