



ENGAGING WHISTLEBLOWING IN NIGERIA

One Year of the Corruption Anonymous (CORA) Project

A publication of the
African Centre for Media &
Information Literacy (AFRICMIL)



Supported by

**MacArthur
Foundation**



December 22, 2016: Federal Government unveils incentivized whistleblowing policy to encourage Nigerians to make public interest disclosures.



July 19, 2017: The Senate passes Whistle Blower Protection bill.



Number of participants who attended multi-stakeholder summit on whistleblowing organized by AFRICMIL in November, 2017. It was chaired by *Mallam Nuhu Ribadu* with *Mr Femi Falana, SAN*, as the keynote speaker.



Number of townhall meetings to sensitize Nigerians on the new policy, conducted in Kano, Owerri and Lagos.



Number of Lawyers who attended a workshop for lawyers on whistleblowing and whistleblower protection.



Number of whistleblower cases handled by AFRICMIL in the last one year.



Number of Radio Stations airing AFRICMIL's whistleblowing awareness jingles in Abuja, Kano, Imo and Lagos. The jingles are in English, Hausa, Igbo, Yoruba and Nigerian Pidgin. They are also available on Youtube.

PARTNERS





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FOREWORD

Nuhu Ribadu*

I commend the African Centre for Media and Information Literacy for putting together this publication and the MacArthur Foundation for supporting this and similar initiatives. The decision to empower public institutions, the media, and civil society, in an attempt to strengthen the current push against corruption is a wonderful decision on the part of the Foundation. There is probably no better way to help Nigeria to find its feet than helping to entrench the fight against corruption through a coherent and systematic campaign that has the support of Nigerians.

There is no gainsaying that for us to succeed in the fight against the corruption scourge there must be uniformity of purpose. What this means is that the government and the people—through the media and civil society organizations, would have to find a common ground. This consensus does not mean civil society serving as trumpets for the government, but it means working together to mobilize citizens, consolidate good practices and point out mistakes along the line.

The importance of the government/people synergy in the fight against corruption is best measured by the trust people have in the integrity of the system. The manifestation of that trust, in turn, is when people go beyond expressing verbal support for the work to volunteering tips and information.

Giving information about crimes to law enforcement agents is a constitutional role of the citizen. In fact, to do otherwise is not only unpatriotic but a punishable offence. However, Nigerians are often reluctant to play this role for a number of reasons. It is not because they are not patriotic. Anytime people see public officers who are serious about their task or a government that is committed, you see a surge of interest on the part of the public to contribute their quota to make the system work.

While working at the EFCC, for example, we benefitted immensely from the support of Nigerians who were willing to provide tips without expecting anything in return. A number of our successful cases were triggered by information by patriotic whistle-blowers who supplied tips that turned out to be very useful for investigators.

Whistleblowing is a very important catalyst that can help law enforcement agents and it is, therefore, not out of place for the government to provide incentives for whistle-blowers with vital information.

I am aware that large amounts of money have been recovered by the EFCC and other anti-corruption and law enforcement agencies since the government introduced the whistleblower policy in December 2016. I am also aware that a proposed whistleblowing protection law is undergoing legislative processes. These actions show seriousness on the part of policymakers to make best use of this opportunity as an anticorruption tool.

The whistleblower policy is not a perfect document. There are issues and grey areas that need to be addressed to arrive at a more robust document. The backend of the public interface platform needs serious tightening to make it fool-proof and ensure that it is not compromised. Those who volunteer information need to be sure of their security and confidentiality. Whistleblowers also need absolute protection from retaliation and redress for undue harassment.

These are some of the issues the Corruption Anonymous (CORA) project of the African Centre for Media & Information Literacy has tried to address through this publication. In the last one year, AFRICMIL, with the support of the MacArthur Foundation, has engaged the public around the whistle-blower policy seeking in the process to create greater awareness about the policy, ensure the integrity of process and advocate for the protection of whistle-blowers. This publication is the outcome of this engagement.

I believe it will benefit policymakers, the media, civil society organisations, and members of the public seeking to understand and interface with the whistleblowing policy and in the process deepen the conversation about whistleblowing and whistle-blower protection in Nigeria.

****Mallam Nuhu Ribadu, lawyer, and retired Assistant Inspector General of Police (AIG), served as pioneer Executive Chairman of the Economic and Financial Crimes Commission (EFCC) from 2003-2007.***

INTRODUCTION

Chido Onumah*

When the Nigerian government announced a whistleblower policy in December 2016, the policy got rave reception as a critical and promising anticorruption tool capable of enhancing citizens' involvement and revamping anticorruption efforts in Nigeria. For years, one of the banes of Nigeria's effort to curb corruption is the absence of citizens' ownership of the fight. It is often seen as the problem of the government with unenthusiastic citizens serving largely as onlookers, or cheering occasionally where the hunt excites them.

With limited understanding of the sociology of corruption and the resultant impacts, many citizens see the mismanagement of public funds as something that doesn't affect them directly and are therefore less inclined to do something about it.. It was therefore difficult to convince the average citizen to join government in fighting corruption. This attitude limits the success of the fight against corruption and often gives those caught in the web the chance to whip up sentiments in their defence.

However, with the announcement of the whistleblower policy, there came the excitement of a feeling of involvement in the anti-corruption process. Though the point should be made that disclosure to law enforcement and security agencies is a civic duty enshrined in the country's laws, the clear-cut pronouncement which ushered in the whistleblower policy provided people with an open invitation to participate in the war against corruption.

Since the announcement, the African Centre for Media & Information Literacy (AFRICMIL), whose vision is to promote media and information literacy as a key component in the enhancement of democracy and good governance and the promotion of accountability and orderly society, has, through its Corruption Anonymous (CORA) project, been engaging the new policy from the civil society perspective. The focus of this engagement is threefold: (1) To create awareness about the policy (2) To ensure the integrity of the process and (3) To campaign for the protection of whistleblowers.

The CORA project is being implemented through the gracious support of The John D. & Catherine T. MacArthur Foundation over a period of three years, beginning June, 2017. The project was formerly unveiled in Abuja on October 12, 2017.

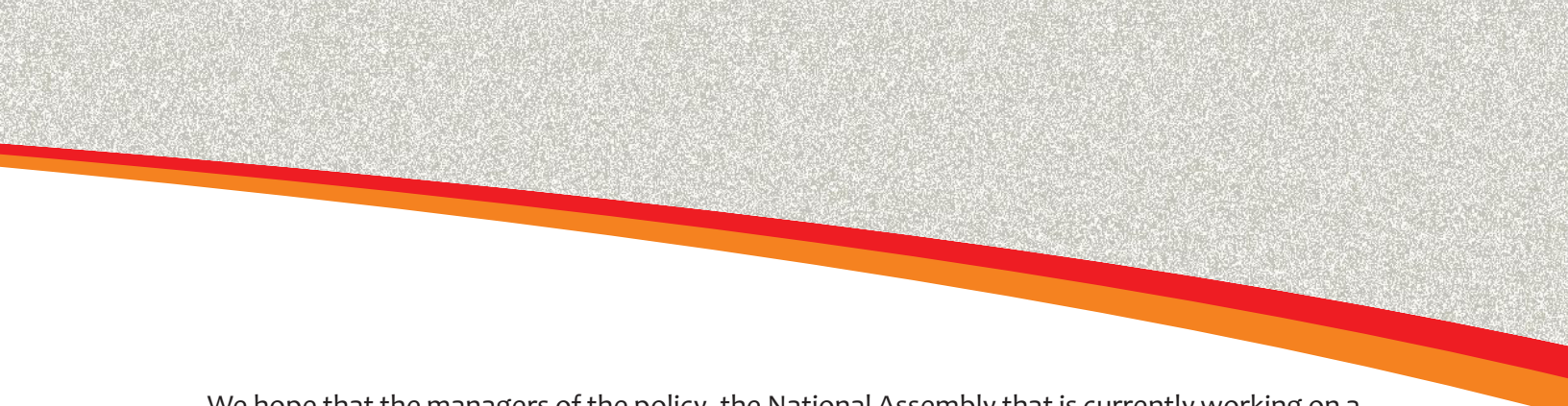
In the past year since the commencement of the project, AFRICMIL has conducted a number of activities aimed at creating public awareness about the new policy and strengthening institutional capacity for the whistleblower initiative. Thus far, the organization has conducted town hall meetings in three cities (Kano, Owerri and Lagos), in addition to a national summit, a media dialogue, training for lawyers as well as a technical workshop for anti-corruption and revenue-generating agencies.

The organization has produced public information and education materials, including radio jingles and stickers with various messages around the effects of corruption and the importance of whistleblowing. The radio jingles aired in five radio stations around the country (Human Rights Radio, otherwise known as Human Rights Radio in Abuja, Freedom Radio in Kano, Hot FM in Owerri, Radio Lagos and Eko FM in Lagos), reaching millions of listeners in English, Nigerian Pidgin, Yoruba, Igbo and Hausa languages.

Most importantly, however, AFRICMIL has taken up cases of whistleblowers who suffered retaliation as a result of their patriotic actions. It has written, on several occasions, to authorities concerned to intercede on behalf of the whistleblowers and issued media statements to draw attention to the plights of these victimized patriots. Through such interventions, Mr. Ntia Thompson of the Directorate of Technical Cooperation in Africa (DTCA), an agency of the Ministry of Foreign Affairs, was recalled in June 2017 after he was summarily retired from service in February of that year. In the case of Mr. Aaron Kaase of the Police Service Commission who was sacked in May 2015, the National Industrial Court, in November 2017, quashed his dismissal and ordered for payment of all his salaries from the date of his dismissal. However, both Messrs Thompson and Kaase have yet to be paid their outstanding salaries. AFRICMIL is also pursuing the cases of Mr. Murtala Ibrahim of the Federal Mortgage Bank of Nigeria and Mr. Babatunde Akeju of the Yaba College of Technology, Lagos.

AFRICMIL notes the desirability of the whistleblower mechanism of citizen engagement in the fight against corruption, as well as citizens' enthusiasm to contribute to its success. However, lack of clear rules and effective system to implement the policy are some of the drawbacks accentuating citizens' mistrust and fear of reprisals.

This report is an account of AFRICMIL's interface with the whistleblower policy in the last one year. It is a window into what different publics think about the policy and how they have been engaging it. The aim is to deepen the conversation around the issue of whistleblowing as policy and tool for fighting corruption as well as the protection of whistleblowers.



We hope that the managers of the policy, the National Assembly that is currently working on a Whistle Blower Protection Bill, the media, civil society groups and NGOs, public interest lawyers, academics, researchers and all patriotic Nigerians will find this report useful and will continue to actively engage the whistleblowing process.

We appreciate the support of all our partners and collaborators in the past one year. We dedicate the report to all patriotic Nigerians who know what corruption has done to the country and are willing, even at personal inconvenience, to do something to make corruption history in Nigeria!

**Chido Onumah is the Coordinator, African Centre for Media & information Literacy.*

EVALUATION REPORT

Overview of Corruption Anonymous Project

In 2017, the African Centre for Media & Information Literacy (AFRICMIL) implemented some significant activities in line with the work plan of the Corruption Anonymous project (CORA) supported by The John D. and Catherine T. MacArthur Foundation. The project was initiated to support the Federal Government's whistleblower policy and the fight against corruption in Nigeria. In seeking to achieve the CORA objective of successful implementation of the whistleblower policy, AFRICMIL relied on three strategies: (1) Creating awareness (2) Advocating for clear rules and guidelines and strict maintenance of the integrity of the process and (3) Canvassing for effective protection for whistleblowers. This annual evaluation report/analysis provides details on the output, outcome and impact of the CORA activities in its first year of implementation.

Advocacy Visits

The project kicked off with advocacy visits to media houses and other stakeholders. The media organisations visited so far include Leadership newspaper, Daily Trust, Premium Times, News Agency of Nigeria (NAN), International Centre for Investigative Reporting (ICIR), Daily Times and Nigerian Television Authority (NTA). The other stakeholders visited include Presidential Initiative on Continuous Audit (PICA), Independent Corrupt Practices and Other Related Offences Commission (ICPC), Presidential Advisory Committee Against Corruption (PACAC), National Orientation Agency (NOA), Nigerian Extractive Industries Transparency Initiative (NEITI), Code of Conduct Bureau (CCB), Hon. Kayode Oladele, Chairman House Committee on Financial Crimes and YIAGA AFRICA. The main purpose of the visits was to introduce the Corruption Anonymous as a project dedicated to complementing government's efforts in popularizing whistleblowing as an important tool in the fight against corruption.

Corruption Anonymous Website

AFRICMIL launched a dedicated website www.corruptionanonymous.org where all reports on whistleblowing and other corruption-related stories are uploaded. The website also provides window for members of the public to submit information on official corruption and infringements.

Unveiling Corruption Anonymous

Corruption Anonymous was officially unveiled on October 12, 2017, at the Yar'Adua Centre in Abuja. The event was organized with the active participation of relevant stakeholders to give

momentum to whistleblowing as a strategic tool in the efforts to reduce corruption in the country.

It was chaired by Prof. Bolaji Owansonje, Executive Secretary of the Presidential Advisory Committee Against Corruption (PACAC) and had in attendance Ibrahim Magu, Acting Chairman of EFCC, Dayo Olaide, Deputy Country Director, MacArthur Foundation, Hon. Kayode Oladele, Chair, House Committee on Financial Crimes, Waziri Adio, Executive Secretary, Nigeria Extractive Industry Transparency Initiative (NEITI), as well as representatives of government agencies, the media and civil society organizations.

National Summit

On November 14, 2017, AFRICMIL organized a National Summit for targeted stakeholders at Rockview Hotel in Abuja. The purpose of the Summit was to harness the opportunities and evaluate the challenges in the whistleblowing policy in the fight against corruption. The event targeted anti-corruption and revenue generating agencies, CSOs, media, youths and government institutions. The Summit recorded tremendous success in terms of participation and deliberations which produced a communique to enhance the realization of the project goal.

Media Dialogue

On December 7, 2017, AFRICMIL held a media dialogue that gave journalists the opportunity to share their views and assess the whistleblower policy after one year of implementation. The dialogue identified the challenges journalists face in reporting on whistleblowers and whistleblowing cases as well as the need to highlight the issue of whistleblower protection.

Information and Education Materials

AFRICMIL produced information and education materials in form of stickers of various sizes containing different messages with key information on the whistleblower policy, the need to report corrupt practices and where to submit tips on corruption.

Radio Jingles

Also, to create awareness, jingles were produced in five languages (English, Nigerian Pidgin, Igbo, Hausa and Yoruba) as a way of ensuring that the message gets to as many people as possible. The video versions are on YouTube while the audio versions aired in five major radio

stations with large listenership in four cities across the country (Abuja: Human Rights Radio; Imo: Hot FM, Owerri; Kano: Freedom Radio; and Lagos: Eko FM and Radio Lagos).

Zonal Townhall Meetings

AFRICMIL commenced its first activity this year with a town hall meeting in Kano State held on February 20, 2018 (in partnership with Kano State Public Complaints and Anti-Corruption Commission (KSPCACC), Faculty of Media, Communication and Film Studies, Bayero University, Kano, and Basic Rights Action, Kano) at Saadu Zingur Auditorium, Mambayya House, Gwammaja, Kano State. The second town hall meeting was held (in partnership with CLEEN Foundation) on March 22, 2018, in Owerri, Imo State and the third town hall meeting was held (in partnership with CLEEN Foundation) in Lagos State on May 8, 2018. The three town hall meetings were aimed at creating awareness about the whistleblower policy among selected stakeholders and citizens in the states the events were held. The three meetings recorded a total number of three hundred and twenty (320) participants. The targeted stakeholders include NGOS/CSOs, MDAs, media and students/youth.

Training for Lawyers

AFRICMIL conducted a one-day training workshop on whistleblowing policy and whistleblower protection on for lawyers on April 26, 2018, at Denis Hotel, Wuse 2, Abuja. The purpose of the training was to engage public interest lawyers on the whistleblowing policy and enlist their support for whistleblowing as a tool for fighting corruption in the country. The training sought to increase their knowledge and understanding of the whistleblowing policy in order to support victims of whistleblowing. The outcome of the training was the formation of a WhatsApp group known as Whistleblower Protection Network by the lawyers who participated in the training. This is to enable them access updates on cases of whistleblowing victims. The interactive platform entertains comments and suggestions on best ways to render legal assistance to victims of whistleblowing policy.

Technical Workshop for Law Enforcement and Revenue-Generating Agencies

AFRICMIL organized a one-day technical workshop on June 21, 2018, at Rockview Royale Hotel, Wuse 2, Abuja. The workshop was for law enforcement and revenue-generating agencies to understand and review existing structures and mechanisms for the implementation of the

whistle-blower policy, examine good practices from other places as well as equip participants with skills for analysing tips and carrying out investigations.

The aim of the workshop was to empower participants with due diligence mechanisms in dealing with whistleblowing cases so that they could apply the knowledge gained in advancing the whistle-blower policy in their various agencies.

Representatives of the following organisations participated in the workshop: the Economic & Financial Crimes Commission (EFCC), Presidential Initiative on Continuous Audit (PICA), Independent Corrupt Practices and other Related Offences Commission (ICPC), Federal Inland Revenue Service (FIRS), Nigeria Extractive Industries Transparency Initiative (NEITI), National Orientation Agencies (NOA), Code of Conduct Bureau (CCB), Nigeria Custom Service, Nigeria Immigration Service, Police Service Commission (PSC), Central Bank of Nigeria (CBN), Presidential Advisory Committee Against Corruption (PACAC), Nigerian National Petroleum Commission (NNPC), Federal Ministry of Justice and the National Assembly. The workshop recorded forty-four participants. The survey conducted during the workshop revealed increased knowledge of the policy by participants. For them, the knowledge acquired at the workshop would help advance their work in using the whistleblowing tool to fight corruption within their organisations. They also indicated their willingness to support the whistleblowing policy in the fight against corruption.

Social Media Engagement

In the last one year of implementing the Corruption Anonymous project in support of the whistleblower policy, AFRICMIL has been active on social media, using it as a tool in promoting awareness about the policy. The platforms being deployed include Facebook, WhatsApp and Twitter. The WhatsApp group (Corruption Anonymous) has over 200 participants. The platforms have been providing updates on the whistleblowing policy and whistleblower cases across the country. They also provide avenues for citizens to access, like, comment and share their views on trending issues of corruption in the country.

Quarterly Corruption Perception Index

AFRICMIL runs a quarterly Corruption Perception Index on topical issues around corruption. The perception poll seeks to sample the responses from the public on the whistleblower policy and corruption issues in the country.

CPI results on awareness of the whistleblower policy and TI comments about corruption in Nigeria.



Challenges

In the early period of implementing the CORA project, AFRICMIL experienced hesitation in securing the buy-in of key stakeholders, especially the Presidential Initiative on Continuous Audit (PICA), a Unit in the Federal Ministry of Finance saddled with the responsibility of managing the whistleblower policy. The cooperation of PICA is very critical to the success of this project. AFRICMIL persisted in its effort and was eventually able to secure the needed working relationship with PICA. There are still some media organisations and government agencies that have yet to respond to AFRICMIL's request for advocacy visits.

Successes

So far, despite the challenges, the CORA project has recorded tremendous successes. It has created significant awareness about the whistleblower policy among citizens, held stakeholders' meetings in various states, distributed information and education materials and aired radio jingles with relevant information on the effect of corruption as a way of demonstrating the need for citizens' involvement in realizing the overall goal of reducing corruption in the country. Government agencies and institutions have woken up to the critical need to deploy the whistleblowing initiative in their work. In the last one year, AFRICMIL has been involved in cases of victimized whistleblowers.

PICA SCORECARD ON WHISTLEBLOWING

The Presidential Initiative on Continuous Audit (PICA), a unit in the Federal Ministry of Finance, is the government body responsible for administering the Whistleblower Policy. The unit comprises of staff of the Ministry of Finance and seconded staff from anticorruption agencies and security organisations. In a presentation at AFRICMIL's Technical Support Workshop on June 21, 2018, Secretary of PICA, Dr. Mohammed K. Dikwa, mni, provided information into the activities of the whistleblower arm of the unit.



Communications Received by PICA – 11,019



Tips Received – 1,983



No. of Investigation – 918



No. Investigation completed – 623



Referral to EFCC/ICPC/DSS. – 40



Convictions (EFCC) – 4



Under Prosecution (EFCC) – 12



Recoveries

N7.8 Billion

US\$378 Million

£27,800

Source: Dikwa, MK. "The Whistleblower Policy Implementation in Nigeria" June, 2018

S/No.	VIOLATIONS	No. of MDAs	STATUS
1.	Contract Inflation and Conversion of Government Assets to Personal use	28	Ongoing
2.	Ghost workers	21	Completed
3.	Payment of unapproved funds	27	Ongoing
4.	Embezzlement of Salaries of Terminated Personnel	62	Completed
5.	Diversion of Excess Crude Oil Funds	5	Ongoing
6.	Improper reduction of financial penalties	1	Ongoing
7.	Diversion of Funds meant for distribution to a particular group of people (farmers)	1	Completed
8.	Diversion of funds to personal commercial Bank Account to earn interest	1	Completed
9.	Non-Remittance of Pension & NHIS Deductions	137	102 Cases Completed 35 Cases Ongoing
10.	Failure to Implement projects for which funds have been provided	61	Ongoing
11.	Embezzlement of funds received from Donor agencies	3	Case Pending
12.	Embezzlement of funds meant for payment of Personnel emoluments	148	113 Cases Completed 35 Cases Ongoing

S/No.	VIOLATIONS	NO. OF MDAS	STATUS
13.	Violation of TSA regulations by keeping funds in Commercial banks	58	Completed
14.	Violation of FIRS (VAT) regulation by adjusting Value Added Tax payment	8	Completed
15.	Non-procurement of equipment required for Aviation Safety	1	102 Cases Completed 35 Cases Ongoing
16.	Money laundering and Diversion of funds meant for approved projects	8	Ongoing
17.	Illegal Sale of Government Assets	4	Case Pending
18.	Diversion of Revenue (IGR)	54	113 Cases Completed 35 Cases Ongoing
19.	Financial misappropriations (embezzlement)	87	76 Cases Completed 11 Cases Pending
20.	Concealed bailout funds	4 States	Case is Pending
21.	Mismanagement of Microfinance banks	3 MFBS	Case is Pending
22.	Illegal Recruitments	33	Completed
23.	Violation of procurement Act	36	32 Cases Completed 4 Cases Ongoing
TOTAL CASES		791	

Source: Dikwa, MK. "The Whistleblower Policy Implementation in Nigeria" June, 2018

Courtesy Calls

In order to enhance relationship with critical stakeholders, AFRICMIL embarked on courtesy visits to some stakeholders in government, National Assembly, the media and civil society actors.



Captions to Photographs

1. Executive Director, News and Current Affairs of the Nigeria Television Authority (NTA), Mohammed Labbo presenting souvenir to AFRICMIL Coordinator, Chido Onumah when AFRICMIL team visited the NTA headquarters on July 21, 2017.
2. Waziri Adio, Executive Secretary, NEITI (5th left), Chido Onumah, Coordinator, AFRICMIL (3rd right) with staff of the two organisations when AFRICMIL team visited NEITI on July 26, 2018.
3. L-R: Chido Onumah (Coordinator, AFRICMIL) and Hon Kayode Oladele (Chairman, House Committee on Financial Crimes) during a courtesy visit to the National Assembly, Sept 20, 2017.
4. AFRICMIL team and staff of the National Orientation Agency (NOA) after a courtesy visit to NOA, February 16, 2018.
5. AFRICMIL team and staff of ICPC after a courtesy visit in Abuja, May 28, 2018.
6. AFRICMIL's courtesy visit to YIAGA Africa, in Abuja, June 28, 2018.

Unveiling of Corruption Anonymous Project

Captions to Photographs

1. L-R: Dayo Olaide, Deputy Director, Africa Office, MacArthur Foundation; Waziri Adio, Executive Secretary, NEITI; Prof Bolaji Owasanoye, Executive Secretary, PACAC; Hon Kayode Oladele, Chairman, House Committee on Financial Crimes; Chido Onumah, Coordinator, AFRICMIL, and Osita Nwajah, Director, Public Affairs, EFCC, at the official launch of Corruption Anonymous (CORA), Oct 12, 2017.
2. Acting Chairman of EFCC, Mr Ibrahim Magu, and a whistle-blower victimized by management of Federal Mortgage Bank of Nigeria, Mr Murtala Ibrahim, at the launch of CORA, Oct 12, 2017.



National Stakeholders Summit

Captions to Photographs

1. L-R: Prof Abdullahi Y Shehu of the National Open University of Nigeria (NOUN), Mr Femi Falana (SAN), Nuhu Ribadu (Ex-EFCC Chair) and Muhuyi Magaji (Chairman, Kano State Public Complaints & Anti-Corruption Commission) at the National Stakeholders Summit, Nov 14, 2017.
2. Group picture of participants at the National Stakeholders Summit.



Media Dialogue

1. A cross section of participants at media dialogue on One Year of Whistleblowing Policy, December 7, 2017.
2. Group photograph of participants at the end of the media dialogue.



Zonal Town Hall Meetings

1. Participants in a group photograph at the end of town hall meeting on Whistleblowing and the Fight against Corruption in Nigeria in Kano, February 20, 2018.
2. Group photograph of participants at the end of town hall meeting on whistleblowing in Owerri, Imo State, March 22, 2018.
3. Mr Mohammed Isa of PICA enlightens participants at the town hall meeting in Lagos, May 8, 2018.
4. Participants at the end of at the end of the town hall meeting on whistleblowing in Lagos.



Workshop for Lawyers

1. Participants at the AFRICMIL Technical Workshop for Public Interest Lawyers in Abuja, April 26, 2018.
2. Mr Dayo Olaide of the MacArthur Foundation making a point at the beginning of the workshop for public interest lawyers in Abuja. To his left is AFRICMIL Coordinator, Chido Onumah and workshop facilitator, Barr Abdul Mahmud.



PERSECUTED WHISTLEBLOWERS

The Faces of Courage and Patriotism

In the last 12 months, AFRICMIL has taken interest in a number of cases involving whistleblowers with a view to highlighting obvious retaliation and ensuring that justice is served. Here is a chronicle of the cases in which AFRICMIL intervened:

Mr. Aaron Kaase, Principal Admin Officer (Press and Public Relations Unit) Police Service Commission



Mr. Kaase wrote a petition on May 21, 2015, to the Economic and Financial Crimes Commission (EFCC) and the Independent Corrupt Practices and other related offences Commission (ICPC) accusing Mr. Mike Okiro, then Chairman of the Police Service Commission (PSC), of corruption, abuse of office and fraudulent act to swindle PSC of an amount totaling of N275,525,000.

The PSC had sought and obtained the sum of N350 million from the Federal Government to train its staff in monitoring the conduct of the police in the 2015 general election. The Commission budgeted for training of 900 staff in Abuja, Lagos and Kano but the entire staff force was not more than 391 and that is the figure actually trained in the programme held in Abuja only.

Although the ICPC investigation did not reveal “any act of criminal infraction” against Okiro, it however directed that the total balance of N133,413,835.99 from the N350,000,000 for the monitoring exercise be domiciled in First City Monument Bank (FCMB) be remitted to the Federal Treasury through the ICPC Recovery Account No. 1012929790 at Zenith Bank Plc.

For daring to blow the whistle, the Commission initiated Kaase's persecution with a trumped-up charge of collecting N1million to procure US visa for a client but failed to do so. On the basis of this, the Commission suspended him without pay through a letter dated May 27, 2015, on the ground that a prima facie case had been established against him.

The threats and intimidation piled up to the point that Kaase had to relocate his family from Abuja when he found out that they were no longer safe. He himself temporarily vacated his home and started squatting at different places around the city.

In two different courts in Abuja where he was arraigned for a purported visa scam, he was discharged and acquitted for “lack of diligent prosecution, and lack of evidence to prosecute the case.” Yet his persecutors would not stop. They have been using a police lawyer, Joseph Nwadike, a Superintendent of Police who obviously got marching orders to fish around courts in Abuja for a pliant judge who will invent reason to convict the whistleblower.

The African Centre for Media & Information Literacy (AFRICMIL) has petitioned the Nigerian Bar Association (NBA), the Inspector-General of Police and the Police Service Commission (PSC) over the unprofessional conduct of the police lawyer.

However, reprieve came the whistleblower's way in November 2017 when the National Industrial Court to which he had prayed for reinstatement delivered judgment in his favour. The court declared Kaase's suspension null and void and of no effect. The judge ordered that he should be reinstated immediately to his position and all his emoluments and entitlements paid to him. But he was only issued a letter of recall in March 2018 after the plan by his persecutors to appeal the judgment was thwarted by senior officials who chose to side with justice.

Although Kaase has since resumed, his outstanding salaries and entitlements from May 2015 to April 2018 had not paid at the time of compiling this report.

Mr. Ntia U. Thompson, Assistant Director, Head of Servicom Unit, Directorate of Technical Cooperation in Africa (DTCA), an agency of the Ministry of Foreign Affairs, Abuja

On April 25, 2016, Mr. Thompson reported to the Economic and Financial Crimes Commission (EFCC) a case of fraud totaling \$229,000 and N800,000 perpetrated by a cartel led by Mr. Mohammed Kachallah, Acting Director-General of DTCA. The funds were meant for the monitoring and evaluation of Nigerian Technical Cooperation Fund (NTCF) projects jointly managed by DTCA and African Development Bank (AfDB), as well as for the celebration of the tenth anniversary of NTCF.

Instead of using these funds as specified, Mr. Kachallah colluded with some staff and diverted the money for their personal use. When Mr. Thompson raised alarm in line with government's



determination to curtail widespread corruption in the public sector, he became a target for severe punishment, including threats and intimidation.

Amid the resulting serious emotional turmoil, he was charged with allegations of violation of the Oath of Secrecy, absence from work without approval, refusal to carry out lawful instructions and making false claims against government officials.

On December 19, 2016, the same month government announced the whistleblower policy as a demonstration of its commitment to the fight against corruption, Mr. Thompson was slammed with an indefinite suspension from office through a letter signed by Sanda S. Isah, Head of Department of Administration of DTCA. On February 7, 2017, Khadija Abba Bukar Ibrahim, Minister of State for Foreign Affairs, approved his compulsory retirement from service.

In response, Mr. Thompson dispatched a petition to the Office of the Head of Civil Service of the Federation, and the Minister of Foreign Affairs.

However, following sustained advocacy by the civil society, notably the African Centre for Media & Information Literacy (AFRICMIL) and the media calling for his recall, a letter emanated from the Ministry on April 5, 2017, stating that the offences for which Mr. Thompson was sacked were not punishable by retirement from service. In other words, the retirement was declared null and void, and of no effect whatsoever.

Mr. Thompson was reinstated on June 20, 2017, by Mr. Geoffrey Onyeama, Minister of Foreign Affairs via a letter which stated that the reinstatement took effect from February 23, 2017. But when he reported for duty, the victimization continued. Instead of resuming in his original office, he was redeployed to the library.

Observing that the harassment and humiliation would increase rather than stop, he sought and got approval for transfer to the Ministry of Budget and National Planning where he is now Deputy Director, Social Development.

Meanwhile, at the time of compiling this report, the backlog of salaries for seven months – the period for which Mr. Thompson was wrongfully retired – has yet to be paid.

Mr. Murtala Aliyu Ibrahim, Unit Head, ICT/Process Audit and Special Investigation, and his boss Mr. Taslim Anibaba of Federal Mortgage Bank of Nigeria (FMBN)

Mr. Ibrahim and his boss, Mr. Anibaba, both auditors at the Bank, were severely punished for exposing a variety of contract fraud and refusal of Internal Audit Group to endorse the Bank's 2016 Half-Year Income Validation Report. The Finance and Accounts Group had reported a surplus of income over expenditure of the sum of N423,653,187. But when the Internal Audit Group was directed by the management to validate the Finance Group's submission, it found out it was actually a loss and not profit.

For exposing malfeasance and insisting that the 2016 Half-Year Report recorded a loss and not profit, the management descended heavily on Ibrahim and Anibaba. In the midst of his annual leave, Ibrahim was transferred from the Bank's headquarters where his expertise was most needed as the most qualified professional accountant, to the office in Jalingo, Taraba State. On May 8, 2017, the Bank terminated his appointment. In August 2017, Anibaba was placed on indefinite suspension.

AFRICMIL intervened through a series of appeals to Mr. Babatunde Fashola, Minister of Power, Works and Housing whose Ministry supervises the Bank, to protect the whistleblowers by ordering their reinstatement and a cessation of further victimization. The advocacy eventually persuaded the Ministry to constitute of a panel of investigation into the matter. After a sitting that stretched through several weeks, the panel in December 2017 produced a report that recommended the lifting of Anibaba's suspension and his return to work immediately.

Although the Bank recalled Anibaba as directed by the Ministry, he was transferred from the headquarters to its Port Harcourt office. The posting was later changed to Kaduna where he has since reported.

Meanwhile, Ibrahim who has remained jobless since May 2017 is still battling for his own reinstatement. Although there are indications that the report recommended his recall, he has yet to be formally notified.



**Mr. Joseph Babatunde Akeju, Chief Lecturer, Department of Accountancy,
Yaba College of Technology, Yaba, Lagos**

Mr. Akeju was to officially retire from service on March 20, 2018, at the age of 65 years but was dismissed by the Governing Council of Yaba College of Technology headed by Prince Lateef Fagbemi, a Senior Advocate of Nigeria, SAN, on March 7, 2018.



The reason the Council gave for his dismissal was that he blew the whistle on corrupt practices and other acts of improper behaviour in the institution. It was the second time Akeju would be dismissed as punishment for his principled stance with respect to openness, transparency and accountability. The first time was in 2009 for refusing to partake in the looting of the College treasury and for using his vantage position as then bursar of the College to expose the financial fraud going on in the institution. He was reinstated in 2016 by Mallam Adamu Adamu, Minister of Education, after seven year and half years of serious mental and physical stress.

This time, however, his dismissal is connected with of the unearthing of N1,682,806,539 (N1.68 billion) of College money unaccounted for between 2008 and 2014. Besides, there are other irregularities going on to which he called the attention of the Governing Council. But the Council decided to criminalize his genuine call for these issues to be addressed and used it as an excuse to dismiss him. The College refused to pay his salaries for February and March. By resorting to the unjust act of dismissal, the Council seeks to lay to complete waste the more than three decades Akeju had put into public service.

AFRICMIL has written to the Minister of Education for a reversal of the dismissal to allow Akeju to retire gracefully and honourably from the College, and is also following up on the whistleblower's petition at the EFCC.

APPENDIX I

Communique Issued at the End of a One-day National Stakeholders Summit on Whistleblowing Organised by the African Centre for Media and Information Literacy (AFRICMIL), in Collaboration with the House of Representatives Committee on Financial Crimes, Socio-economic Rights & Accountability Project (SERAP) and the Wole Soyinka Centre for Investigative Journalism (WSCIJ), on Tuesday, November 14, 2017, at Rockview Royale Hotel, Abuja



The National Stakeholders Summit on whistleblowing was held in Abuja on Tuesday, November 14, 2017. The summit organized by the African Centre for Media and Information Literacy (AFRICMIL), in partnership with the House of Representatives Committee on Financial Crimes, Socio-economic Rights and Accountability Project (SERAP) and the Wole Soyinka Centre for Investigative Journalism (WSCIJ) aimed to enhance collaboration in the fight against corruption and improve the effectiveness of whistleblowing in anti-corruption in Nigeria.

Over 80 participants from anti-corruption institutions, government agencies, civil society organisations and the media, attended the summit which featured speakers and experts on anti-corruption.

The summit chaired by Mallam Nuhu Ribadu, pioneer Chairman of the Economic and Financial Crimes Commission (EFCC) featured a keynote address by Mr. Femi Falana, SAN, and two more presentations by Waziri Adio, Executive Secretary, Nigeria Extractive Industries Transparency Initiative (NEITI) and Prof. Abdullahi Shehu, immediate past Director General of GIABA, the Inter-Governmental Action Group Against Money Laundering in West Africa.

The paper by the NEITI Executive Secretary who was represented by Dr. Dauda Garuba explored opportunities for whistleblowing in the extractive industry in Nigeria while Abdullahi's paper was a critique of the experience of whistleblowing in Nigeria since the introduction of the policy by the Federal Government in December 2016.

At the end of the robust presentations and discussions that followed, the summit made the following critical observations and recommendations expected to improve collaborative effort in whistleblowing and sustain the gains of the whistleblowing policy in Nigeria.

Observations

- That the whistle-blower policy is a critical and promising anticorruption tool capable of enhancing citizens' involvement and revamping anticorruption efforts in Nigeria.
- That the absence of proper legal backing and lack of adequate protection for potential whistleblowers is a serious constraint to the effectiveness of whistleblowing in Nigeria and a threat to public confidence in the policy.
- That there is urgent need for a properly defined independent governance structure for managing recoveries made through whistleblowing to ensure transparency and accountability.
- That the delay in the passage of the whistle-blower protection bill currently locked in legislative processes in the National Assembly along with other major anti-corruption bills are major threats to current anti-corruption efforts in Nigeria.
- That the delay on the part of the Federal Government in constituting the Boards of parastatals and MDAs, including some anticorruption agencies, in the past two years, is hampering the fight against corruption.
- That states and local governments across the country have not shown sufficient interest and support for the anti-corruption stance of the current administration by not replicating key policies in this regard.
- That there is no uniformity of purpose in the fight against corruption by the ruling political party and among key government officials.
- That there is no coordination in the fight against corruption among the various anti-corruption and security agencies.

- That from independence to date, Nigeria has failed to put in place mechanisms that enable the country to adequately account for the revenues from extractive industry which constitute about 85% of the country's revenue.
- That civil society groups are not adequately involved in the implementation of whistleblower policy, which makes it difficult to optimize citizens involvement.
- That the private sector has not taken advantage of the whistleblower policy.
- That whistle-blowers have become victims of their own patriotic acts in view of the delay of the government to speedily reward them in accordance with the policy or protect them against punitive actions.

Recommendations

Based on the observations above, the Summit recommended as follows:

- Government should urgently finalize legislation to protect whistleblowers and their relations, which will bolster public confidence and support for the policy.
- Measures should be urgently put in place by relevant agencies to address the security of whistle-blowers and resolve cases of persons who are persecuted for giving out information.
- There is urgent need for government to set up independent governance structure comprising representatives of anti-corruption agencies and credible Civil Society Organisations (CSOs) to oversee the implementation of the whistleblower policy.
- The National Assembly should hasten up the passage of the whistle-blower protection and other relevant bills that will support the fight against corruption.
- That in addition to ensuring their safety and protection, government should motivate whistle-blowers by prompt payment of their entitlements.
- States and local governments across the country should immediately take the initiative to address grand and retail corruption prevalent at those levels of governance. One way to do that is to quickly adopt the whistleblower policy.
- Government should ensure appropriate coordination and cooperation among the anti-corruption and security agencies in the fight against corruption for greater success.
- Government should take adequate steps to address the lack of effective transparency and accountability in the extractive industry, by making use of the whistle-blowing opportunity.
- That private sector operators should not see the whistle blower policy as only applicable to government agencies, and should devise means to adopt in line with global best practice.

- That the whistle-blowing initiative should be of interest to development partners working to support the fight against corruption in Nigeria.
- Civil Society groups are key to the fight against corruption and should be adequately involved in the initiation and implementation of anti-corruption policies of government.

Conclusion

The summit commended the Federal Government for the signing on to the Open Governance Partnership (OGP) and other international instruments to aid the fight against corruption.

The summit appreciated the government's whistleblowing initiative and expressed satisfaction with the results achieved in the fight against corruption through information provided by whistle blowers.

It commended whistle-blowers for their patriotism in volunteering information, as well as civil society and media for their roles in taking up cases of victimized whistle blowers and advocating for a corruption-free Nigeria.

Finally, the summit noted the role of The John D. and Catherine T. MacArthur Foundation in supporting the fight against corruption in Nigeria.

Signed:

Muhuyi Magaji Rimin-Gado

Chairman, Kano State Public Complaints & Anticorruption Commission

Ibrahim M. Zikirullahi

Resource Centre for Human Rights & Civic Education (RCHRCE)

Godwin Onyeacholem

African Centre for Media & Information Literacy (AFRICMIL)

APPENDIX II

Position Paper Developed by African Centre for Media & Information Literacy (Africmil) at the End of a Media Dialogue Assessing the One Year of the Whistleblowing Policy of the Federal Government of Nigeria Held on December 7, 2017



Introduction

On December 7, 2017, the African Centre for Media and Information Literacy (AFRICMIL), in partnership with Premium Times Centre for Investigative Journalism (PTCIJ) held a media dialogue at the Yar'Adua Centre in Abuja to assess one year of the whistleblowing policy of the Federal Government of Nigeria.

Background

Recall that the Federal Government of Nigeria had, in December 2016, announced the whistleblowing policy as part of its anticorruption strategy. Since then, various government institutions have made many disclosures of recovery of huge amounts of money and assets with the aid of information provided by whistle-blowers.

On the other hand, however, at least three employees of the federal government lost their jobs because of their courage in divulging information about frauds in their respective working places. The anticorruption agencies have also charged two persons to court for allegedly giving

false information. And, the highest amount to be recovered since the policy, the \$42 million cash stashed in a Lagos apartment, is still a subject of controversy over payment of the reward due to the whistle-blowers.

One year after, the whistleblowing policy has achieved significant level of public attention, and stepped up the fight against corruption, going by the number of tips received. However, the policy has some grey areas that need to be clarified, if it is to have the needed impact.

The media dialogue, therefore, brought together media practitioners, as watchdogs of the society, to offer independent assessment of the policy, with a view to identifying the gains and the areas that need to be fine-tuned.

The discussion which drew participants from different media houses and representatives of civil society organisations was moderated by Oke Epia, publisher of OrderPaperNG. On the panel were Yusuf Alli, Managing Editor, Northern Operations, The Nation Newspaper; Catherine Agbo, former Editorial Director, Leadership newspapers; Theophilus Abah, Managing Editor, Daily Trust newspapers and Aisha Hashim, representing Joshua Olufemi, Director of Programmes, PTCIJ. Mr. Isa Mohammed from the Presidential Initiative on Continuous Audit (PICA), the administrators of the whistleblowing policy, delivered the opening address on behalf of the Secretary of PICA, Dr. Mohammed Dikwa.

The Policy

The whistleblowing policy, as it is, is still a policy statement that has no legal backing, though a law to that effect is currently undergoing legislative processes. There is, therefore, no legal backing to whatever is tied to the new policy (example, remuneration for whistle-blowers).

The guideline has yet to be articulated into a publicly available document, aside a FAQ document that is obtainable from the Ministry of Finance web portal (whistle.finance.gov.ng). The FAQ document, however, provides basic but important information to aid those who want to make submissions. A number of other things are, however, either unclear or untreated by the document.

- For instance, to qualify for the reward, a whistle-blower must provide government with the information it does not already have and could not obtain from any other publicly available source to the government. The actual recovery must also be on account of the information provided by the whistle-blower. The question is, how does a whistle-blower know an information that is not already available to the government?

- Secondly, for a whistle-blower to be entitled to a reward the information supplied must prompt the holder of the concealed public funds or assets to return them to the government voluntarily. The question is, what happens when the information supplied is authentic but the holder of the loot refuses to surrender it voluntarily and the government is only able to recover the loot through litigation or some other means. Does it then mean the whistle-blower will get nothing under this circumstance?
- Thirdly, a whistle-blower responsible for providing the government with information that directly leads to the return of stolen public funds or concealed assets is entitled to anything between 2.5 to 5% of the amount recovered. Who determines this and how do they arrive at a percentage that is due to a beneficiary?
- Section 16 of the policy states that a whistle-blower who intentionally provides information that is found to be false or misleading would be referred to law enforcement agents for investigation and possible prosecution. The question is, at what stage is a whistle-blower guilty of the charge of providing false information? If a whistle-blower submits a tip and government delays in acting, and by the time it finally does the loot has been relocated, would the whistle-blower still be liable to a charge of providing false information?

The aforementioned are some of the grey areas that need to be addressed in the policy.

Implementation of the Policy

The Whistle-blowing mechanism is a useful tool in Nigeria's anticorruption mechanism. It empowers and encourages citizens to take the lead by providing information that could expose corruption and corrupt activities. Two things were responsible for this positive reception at the beginning: The government setting up a central window for reporting, thus indicating seriousness, and the prospect for reward (of between 2-5% of the recovered illicit funds); thus, providing incentives to the public.

As the Minister of Finance, Mrs Kemi Adeosun disclosed, the government had raked in N11.6 billion through whistle-blowers, as at July 2017.

However, the transparency and workings of the system are issues of concern. There is no clarity on how the leads supplied by whistle-blowers are collated and processed. It is also not clear how the various government agencies and departments working on those leads share responsibility.

There are concerns that because the whistle-blowing policy has no legal backing, it may have wide-ranging implications on activities under the policy.

There is still fear of reprisal against potential whistle-blowers since the policy does not cogently address the issues of protection against retaliation. Government has not acted swiftly to show commitment to whistleblowing by demonstrating its preparedness to protect whistle-blowers from retaliatory actions. For instance, it took the efforts of some CSOs and the media through advocacy and reports to secure the reinstatement of two whistle-blowers. There is an ongoing effort to ensure the reinstatement of a whistle-blower who was dismissed last May by the Federal Mortgage Bank of Nigeria (FMBN).

The administration of the whistleblowing policy is totally controlled by government and sited in a key government ministry that oversees government finances. This raises some concern about the independence of the handlers of the policy.

Added to this is the fact that PICA also has other responsibilities so cases of whistle-blowing that should be acted on swiftly may take a lot of time, thereby fuelling concerns over accountability and credibility.

The reward system is poorly managed resulting in first, delay in the payment of the real beneficiary and second, compromising safety and protection as witnessed in the case of the Ikoyi whistle-blower.

Based on the observations above, it is recommended as follows:

Ministry of Finance/PICA

- There is need to create awareness and strengthen advocacy on the whistleblowing policy as a way of enhancing its cultural acceptance by citizens as an important tool for fighting corruption. It is essential that PICA ensures honest implementation of the policy by providing accessible disclosure channels for whistle-blowers, and meaningfully protect them from all forms of retaliations.
- The confidentiality and anonymity of whistle-blowers must be maintained, and there is need to ensure thorough, timely and independent investigations of whistle-blowers' disclosures. This is because disclosures are sometimes rendered useless by the amount of time taken before they are investigated.

- There is also need for a transparent, enforceable and timely mechanism to follow up on whistle-blowers' retaliation complaints (including a process for disciplining perpetrators of retaliation). PICA should ensure that the information disclosed can be used to advance needed reforms in terms of correcting policy or procedural inadequacies and preventing future wrongdoing.
- PICA should create a feedback mechanism to ensure that as many whistle-blowers as possible get responses to their tips notwithstanding the outcome.
- PICA should provide regular updates on the number of tips it receives and how it manages tips, including to which anti-corruption agencies the tips are sent and the outcome.

Federal Government

- For the whistleblowing policy to have the desired impact, government needs to make it an independent unit with an inclusive, multi-stakeholder composition that will include credible civil society groups and professional bodies. Making the whistleblowing unit a stand-alone unit will invest trust and confidence in the policy.
- Given that government needs the input of citizens for the war against corruption to succeed, it is important to create awareness about a citizen-focused mechanism such as the whistleblowing policy and strengthen advocacy by expressly and fully collaborating with the media and the civil society organizations to sensitize citizens on the benefits of whistleblowing.
- Government can strengthen the acceptance and credibility of the whistleblowing policy by including CSO/media practitioners in the administration/management of reward for whistle-blowers. Government, for instance, can sponsor adverts in both print and electronic media, or drama sketches, to portray the harmful effects of corruption in the society and how they can be reduced through whistleblowing.
- Government should put in place an internal mechanism that ensures that tips are acted upon promptly so that there are no loopholes to discredit tips. Tips are sometimes rendered useless by the amount of time taken before cases are investigated.
- Government must ensure protection of whistle-blowers by making its commitment to their safety and protection very clear in the policy, and also demonstrate its commitment by ensuring that no whistle-blower falls victim of his/her patriotic action. This includes all

types of harm, such as dismissal, punitive transfers, harassment, withholding of promotion or training, loss of status and benefits, and threats of such actions.

- There must be a full range of remedies to cover all direct, indirect and future consequences of any reprisals suffered by a whistle-blower. This includes attorney and mediation fees, transfer to a new department or supervisor, compensation for lost past, present and future earnings and status, as well as compensation for pain and suffering.
- A fund to provide assistance for legal procedures and support whistle-blowers in serious financial need should be considered.
- Government must take out ambiguous clauses such as “may” and replace them with more concrete and definitive clauses that connote its commitment. For instance, the use of “may” in Section 12 (Paragraph 2) of the policy which deals with protection against retaliation as a result of whistleblowing does not indicate a strong signal on the part of government to act against perpetrators of adverse treatment (harassment, intimidation or victimization) of whistle-blowers and make restitution for losses suffered. Going by the phrasing of this paragraph, even where it is established that there is a prima facie case that a whistle-blower has suffered adverse treatment, there is no certainty that the perpetrator(s) would be punished. This is an unmistakable discouragement for potential whistle-blowers.
- Also, in the second bullet point in Section 14 which deals with reward scheme for disclosure of information leading to the voluntary return of stolen funds/assets, the use of “may” does not provide solid assurance that a whistle-blower whose tip has led to recovery will receive any reward.
- Government must efficiently manage the reward system by ensuring that whistle-blowers whose tips lead to recovery are promptly paid their dues.
- In addition to rewarding whistle-blowers, government can make whistleblowing attractive by ensuring immediate reinstatement of all those who have been relieved of their jobs for blowing the whistle.
- Government should also promote a campaign to make citizens understand that they have a constitutional duty to provide information or help law enforcement agencies in the discharge of their duties. The Nigerian Constitution enjoins every citizen in Section 24(d) to make positive and useful contribution to the advancement, progress and well-being of the community where he or she resides; and in Section 24(e) to render assistance to appropriate and lawful agencies in the maintenance of law and order.

- Government should encourage a speedy process of giving legal backing to the whistleblowing policy so as to ensure its institutionalization and sustainability by subsequent governments.
- In order not to discourage whistleblowing, government must not unduly criminalize whistleblowing on account of allegations of false information provided by whistleblowers.

National Assembly

- Both the Senate and the House of Representatives should support the war against corruption by promptly passing into law the whistle-blower protection bill which has been stalled in the National Assembly.

Civil Society Groups

- CSOs should collaborate with government and the whistleblowing office (PICA) in mobilising citizens towards adopting whistleblowing as a vital anti-corruption tool.
- Civil society should advocate for an inclusive, multi-stakeholder ombudsman to administer whistleblowing so as to ensure its effectiveness as a weapon for fighting corruption.

Media

- The media should continue to work with the civil society to support government in the fight against corruption.
- As much as possible, the media should continue to put whistleblowing in the limelight and push for its acceptance by the citizens, work towards a transparent and honest implementation, as well as the protection of whistle-blowers.

APPENDIX III

Whistle Blowing and Whistleblower Protection in Nigeria: *Policy and Legal Review*

By Abdul Mahmud

Abdul Mahmud, Lawyer and human rights activist, is President, Public Interest Lawyers League (PILL).



The Whistleblowing Policy and the Whistleblower Protection Act are two of a number of policy and legal frameworks that promote the culture of conducting public and private sectors' governance businesses with transparency, openness, honesty, fairness and integrity. Whistleblowing, therefore, involves the disclosure of information on misconducts and corrupt practices of public officials, misappropriation and mismanagement of public funds and resources, or acts and actions of persons or institutions capable of prejudicing and harming public interests or the public environment. In order to eliminate infractions on public policies and laws, some form of legislation like the Whistleblower Protection Act is enacted by national and states parliaments to secure confidence in the democratic and governance processes, facilitate and encourage public disclosures, and provide protection for those who make protected disclosures.

Under the Whistleblower's legal regime, those who make confidential disclosures are normally protected from retaliatory attacks or adverse consequences of their disclosures, criminal and civil liability, dismissal or breach of confidentiality and their identities are also kept confidential. Public disclosures of improper conduct or misconduct, corrupt practices, actions that prejudice and harm the public environment that would ordinarily be suppressed by public officials who hide under the exemption provisions of the Freedom of Information Act, 2011, are usually made subjects of public disclosures under a proper Whistleblower Protection regime.

So, the Whistleblower programme offers both the sword (to anti-corruption public enforcement institutions like the EFCC, ICPC, Special Fraud and Investigation Unit of the Nigeria Police Force, Financial Reporting Council, FRC) and the shield (whatever Whistleblower Protection Body or Agency established by law to offer protection to whistleblowers) in uncovering humongous corrupt practices and offering protection to whistle blowers- both in the public and private sectors generally.

The weakness of the current approach of the Federal Government of Nigeria/ Federal Ministry of Finance, which in its definitional and policy scopes limit whistleblowing only to the public sector, can be discerned. Corruption is pervasive in our country, and it is expected that to fight or reduce its pervasiveness, the FGN/FMF Whistleblower programme would have addressed the issue, with particular attention paid to reforms of existing laws guiding both public and private sectors' environment, in the following areas:

- a. By proposing amendments to the Companies Act to include whistle blower provisions in the area of: (i) Tax avoidance and evasion, (ii) improper financial misconduct and corrupt practices.
- b. By proposing amendments to Laws/Acts of Regulatory Institutions, etcetera.
- c. Proposing corporate disclosures generally.

One objective gain to be made by extending the whistleblower policy to the private sector is that it imposes stringent requirements on the private sector to develop internal reporting mechanisms, policies and procedures for facilitating disclosures, and, also, for protecting and supporting employees who report wrong-doings. The approach to enacting comprehensive public policy and legislation covering the public and private sectors invariably helps to address the problem of illicit flows of corruption proceeds and money laundering, which, in our circumstance and experience, is often, traced to the private sector, particularly the banking sector.

This particular weakness can be discerned in both the policy document and the FAQs document released by the Federal Ministry of Finance. The FAQs document in particular specifically states that whistleblower programme “does not apply to personal grievances concerning private contracts”. While the objective of exclusion seeks to close off whistleblowing to fraudulent disclosures and to disclosures that do not enhance the objectives of the whistleblower programme, it does not provide clarity to such private contracts, like employment contracts, where bribes are solicited for the personal advancement of prospective whistleblowers.

It is common knowledge that in the civil service of our country, civil servants pay bribes to secure promotions and career advancements. One example is the recent promotion of officers of the Nigeria Police Force. A few days ago, the respected online portal, Aledoh.com alleged that officers of the Force paid as much as Two Million Naira each to secure promotion. If you add two million naira to the number of officers promoted, you would imagine the kill made by members of the Police Service Commission. Yet this is the same Commission in which a whistle blower was victimized and thrown out in the cold, without legal protection. Another point which lends itself out as a limitation of the whistle blowers programme is that it does not explain or clarify what constitutes “private contracts”.

The question invariably is: can private contracts that have public interests, as in contracts relating to public-private-partnership, be classified simply as private contracts? In light of the foregoing, the following few weaknesses suffice:

- (a) It is not clear who determines that a disclosure satisfies prima facie proof
- (b) The absence of legislation to protect whistle blowers and of oversight agency responsible for whistleblower protection makes the whistleblower programme inconsistent with international best practice;
- (c) The whistleblower programme is not clear on the protection that can be provided to whistle blowers who make disclosures anonymously. See Number 8 of the FAQs document of the Federal Ministry of Finance.

In our country anonymous disclosures are not always anonymous, more so when the reporting structures for analysis and investigation of disclosures are multi-layered. However, in spite of the weaknesses of the whistleblowing policy outlined above, the policy recognizes the need to end corruption in our country, prevent harmful practices and behaviours that undermine the safety of the state-let us be honest, corruption is one singular threat to the national security of our country- and encourage citizens to take the buy-in into the current anti-corruption effort of this government. The idea is that citizens own the anti-corruption war.

At the moment, whistle blowing exists only as a policy framework (and perhaps in the governance framework of a few public and private institutions and in a few legislations such as the EFCC and ICPC Acts) and since it is still in early stages of formulation, articulation and execution, there is no single legal framework upon which the whistleblowing policy rests or scholarly writings on these aspects of what I characterize as sunshine legislation, so my purpose here is to provide a broad review of what constitutes whistle-blowing, some policy versus law constraints, the nature of whistle blowing and whistle-blower protection, motivations for whistle blowing and protections generally for the whistle blower. Below, is a synthesis of what constitutes the policy and legal frameworks of whistle blowing.

Review of Policy and Legal Framework

For us to understand whistle blowing, it is important to have a glimpse of the current Whistleblowing Policy of the Federal Government and appraise it in a manner that gives clarity to the current war against corruption. Though the whistle blowing policy document is a work-in-progress, we can only understand its thrust when we glimpse the policy and scrutinize it. So, what I undertake in my review here is a discernment of the 'Whistleblowing Policy and the Frequently Asked Questions (FAQs)', matched against some of the best practices' considerations of whistle blowing and whistle blower's protection frameworks elsewhere.

In the concluding section of this paper, I shall do a cursory legal review of what appears as the legal framework on whistleblowing and whistleblower protection- the current Bill on Whistleblower Protection before the National Assembly which has already passed the Third Reading; but there are indications that there hasn't been any concurrent scrutiny of and/or debate conducted on a similar Bill at the House of Representatives. Although legal review of the Bill appears speculative, but there are gains to be made if a proper scrutiny is made of the Bill in order to expose whatever weaknesses that exist in the Bill and to remedy the weakness before the Bill becomes an Act of the National Assembly. I must however stress that there is no assurance that the Bill will eventually be passed into law.

From the foregoing, the following issues stand out in the current Whistle Blowing Policy of the Federal Government, which to all intent and purpose is consistent with best global practice:

a. Introduction

The introduction highlights government's commitment to openness, transparency, integrity and accountability, and government's commitment to protecting citizens and their workers where concerns are raised about any aspect of its work through appropriate legal channels.

b. Policy Aims

The policy's aims provide clear, concise and consistent framework to enable government, employees and employers, institutions to understand and implement procedures that are in accordance with governance rules and processes, including the law.

c. Scope

That the policy applies to all persons working in the ministries, Departments and Agencies of the government; to all contractors executing public contracts, suppliers of goods and services, etcetera.

d. Commitment to Action

Implicit in the Policy is Government's resolve to:

- (i) Act honestly and with integrity at all times
- (ii) Safeguard and protect government's resources
- (iii) Comply with the law and regulations
- (iv) Setting out a clear Whistleblowing Policy and keeping it up to date
- (v) Providing information about how to report breaches and suspected breaches of the policy
- (vi) Rigorous investigation mechanism on breaches, wrong doing and disclosure
- (vii) Ensuring that nobody is victimized for blowing the whistle

e. Safeguards

Ensure protection framework for those who make public disclosures without fear of harassment, discrimination and victimization.

f. Responsibilities:

The prevention, detection and reporting of wrong doing are the responsibilities of all.

g. Confidentiality:

The policy highlights the need for the confidentiality of all public disclosures, and for the anonymity of the makers of public disclosures. The point here is that policy must encourage a maker of public disclosure to put his name to his allegation, but the allegation must be treated with confidentiality and the identity of the maker protected to avoid reprisal actions.

h. False or Untrue Allegations:

- (i) If you make an allegation in good faith, but it is not confirmed by investigation, no action will be taken against you.
- (ii) If the investigation indicates that the allegation is false and appears to have been made in bad faith, you are likely to be prosecuted or internal disciplinary action taken against you.

i. Responsible Officer/Institution

The policy indicates an officer or institution that has overall responsibility for the implementation of the policy.

The policy articulates the following:

- (a) How staff of MDAs (for instance) can raise concerns;
- (b) What concerns should be raised under the policy
- (c) With whom should the concerns be raised
- (d) How government will respond to a disclosure
- (e) How concerns can be addressed
- (f) Records of concerns
- (g) Reassurance
- (h) Reward

Deducing the FAQs, a document put out by the Federal Ministry of Finance to give clarity to the Whistleblowing Policy, the thrust of the policy appears to relate to wrong doings of Politically-Exposed-Persons (PEPs). The proper approach is to first make the policy applicable to all MDAs, and then take steps to amend the Civil Service Regulations to reflect the thrust of the policy. The purpose is to ensure that MDAs have internal checks to detect and correct illegal and inappropriate behaviours and mechanisms for individuals to report wrong doings. One

outstanding benefit of the whistle blowing framework is that it lends itself out as another channel for reporting wrong doings when internal mechanism fails or it is compromised, or when the bureaucratic and command structures of the MDAs make it difficult to report wrong doings or correct in appropriate behaviours. If whistle-blowing is a mechanism to reform MDAs, it stands to reason that when public institutions with bad historical pathologies are neck deep in corruption, whistle blowing framework then provides the searchlight for triggering reforms and corrections, through exposure, naming and shaming. The current policy appears removed from all of this. I may be wrong.

The idea that whistle blowing facilitates and encourages the exposure of corruption has influenced the enactment of legislations that encourage citizens to report frauds, wrong doings, and inappropriate behaviours and make public interest disclosures. As with all ideas that begin first as ethical responses to social and economic infractions, whistle blowing is increasingly becoming ethical and legal principles that govern state responses to corruption. This is especially the case in our country where corruption is a serious problem. However, while Whistleblowing and Whistleblower Protection is slowly taking root as a policy consideration, the development of whistle blowing law as a binding legal framework hasn't caught up with public policy.

As I noted earlier in this section of my paper there is no single law on Whistle blowing and or law on Whistleblower Protection in the country, beyond the Bills presently before the two arms of the National Assembly. Though my review of the legal regime of whistle blowing here appears speculative and tendentious, but a cursory analysis of the Whistleblower Protection Bill 2017 before the Senate highlights two fundamental strengths of the Bill, though the Bill is as useless as the order paper in which it is contained. First, that the thirty-eight sections of the Bill highlight two purposive approaches (I will come to this shortly) adopted by its proposers. Two, as a proposed instrument of law, it allows us to glimpse the Bill as the proposed legal regime of whistle blowing.

I return to the purposive approaches of the Bill. The point the Bill highlights is that any legislative instrument aimed at protecting whistle blowers must be couched to achieve two purposes. One, that retaliation against whistle blowers is a criminal offence. Here retaliation, victimization and adverse actions against whistle blowers are criminalized. The Bill criminalizes retaliation by borrowing the principle set by the Supreme Court of Canada in **Merk v. International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers, Local 771 (2005) 3 SCR 425**. The Supreme Court of Canada, in criminalizing retaliation interpreted Section 74(1)(a) of the Labour Standards Act, which provides as follows:

No employer shall discharge or threaten to discharge or in any manner discriminate against an employee because the employee:

Has reported or proposed to report to a lawful authority any activity that is or is likely to result in an offence pursuant to an Act or an Act of the Parliament of Canada...

Second, the whistleblower's duty of disclosure of wrong doing cannot be constrained by the internal reporting mechanism. Here, the fidelity of the whistle blower is **NOT** only to his/her organization or institution but to the public-at-large. Justice Binnie gives clarity to this important purposive objective thus:

The duty of fidelity does not mean that the Daniel Ellsbergs and Karen Silkwoods of the world must remain silent when they discover wrong doing occurring at their place of employment. Neither, the public nor the employee's long term best interests are served of these employees, from fear of losing their jobs, are so intimidated that they do not bring information about wrong doing at their place of employment to the attention of those who can correct such wrong doing. However, the duty of fidelity does require the employee to exhaust informal whistle blowing mechanisms before going public.

Considering the two purposive objectives outlined in the foregoing, the question to be asked is: Does the proposed Whistleblower Bill, 2017 meet purposive objectives? On the first purposive objective which criminalizes retaliations against whistle blowers, section 25 (1) of the Whistle Blower Bill, 2017, consistent with the principle set out in the Canadian case of **Merk v. International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers, Local 771 (2005)**, provides:

A person who takes detrimental action against a person in reprisal for a protected disclosure commits an offence and is liable to conviction to a fine not exceeding Three Hundred Thousand Naira (₦300,000) or to imprisonment for a term of not more than two years or to both.

And on the second purposive objective, section 27, in principle removes the constraints that the internal reporting mechanism creates by voiding any contract of employment that “seeks to prevent the employee from making a disclosure of improper conduct, or has the effect of discouraging an employee from making a disclosure of improper conduct”. This is what Section 27 provides:

From the commencement of this bill, any provision in the contract of employment or other agreement between an employer and an employee is void if it –

- (a) seeks to prevent the employee from making a disclosure of improper conduct;
- (b) has the effect of discouraging an employee from making a disclosure of improper conduct;
- (c) precludes the employee from making a complaint in respect of victimization...

To my mind, the proposed Whistleblower Protection Bill which has passed the Third Reading of the Senate since 19th day of July, 2017 does not pass the criteria for evaluating bills of this nature that touch on the fundamental and moral health of society. The Bill is too frivolous in the way it addresses the problems of corruption to be taken seriously. A bill of this nature must seek to establish watertight protection for whistleblowers and not set up a framework that diffuses the powers of existing anti-corruption institutions thereby weakening them. The bill is inconsistent with global best practices of law-making.

The weaknesses of the Bill are numerous, but a few suffice here, chief of which are: 1) The Bill names too many reporting and investigation agencies; 2) There is no clarity as to what institution is the prime reporting 'institution' or clarity as to whether the bill covers only the public or private sectors and or both. The interpretation section of the Bill appears to address this concern, but only to the extent in which it defines “an individual, a body of persons, an institution or a corporation”; 3) The reward for public interest disclosure set as 1.5% (of the amount of money recovered if the amount is less than one billion Naira) and 1% if the money recovered is more than one billion or the monetary value of a property, whether moveable or immovable respectively is too small.

Finally, the need to have a proper legal framework on whistleblower protection cannot be overemphasized. Beyond, the idea of whistleblowing, a legal framework that recognizes the need to protect whistleblowers from discriminatory and retaliatory actions, proposes best practices on investigation of public interest disclosures. There are four basic actions that should be considered in framing the law on whistle blowing and whistleblower protection. First, there must be effective and legal avenues for whistle blowers to report corruption, inappropriate behaviours, and public interest disclosures. Second, the legal framework on whistle blowing and whistle blower protection covers all sectors of the National life except the Intelligence services and the Armed Forces. Third, the legal framework must be rooted in the common-law principle or “NO CONFIDENCE IN INIQUITY”— which means employers or government cannot

hide behind confidentiality to prevent workers from speaking about wrong doings. Fourth, there must be provisions to protect whistle blowers from retaliation and victimization, punishments for retaliatory actions. Five, it legalizes the reward system for public interest disclosures.

I must stress that one important legal principle which the law on whistle blowing and whistle blower protection must articulate is that which Article 33 of the United Nations Convention Against Corruption (UNCAC) stipulates.

Each state party shall consider incorporating into its domestic legal system appropriate measures to provide protection against any unjustified treatment for any person who reports in good faith and on reasonable grounds to the competent authorities any facts concerning offences established in accordance with the constitution.

Discerning this important Article 33 UNCAC, what is required for a whistleblower to come under legal protection is that he/she has both “reasonable grounds and good faith” in reporting wrong doing. Note: the Article only relates to reports made to “competent authorities” and not to the media or anonymous leaking platforms. For our experiences, I commend the United Nations Convention Against Corruption (UNCAC) and the Council of Europe's Criminal Law Convention (COECLCC) as guides to our enactment of legislation on whistleblowing and whistle blower protection.

Twenty Ways to Understand Whistle Blower Protection

- 1. What is whistleblowing?**
The practice or the act of making public interest disclosure, wrong doing, misconduct, revealing or disclosing information about another person or institutions' misconduct or impropriety.
- 2. Who is a whistleblower?**
Any person who discloses any wrong doing, or makes public interest disclosure on corruption
- 3. Who can blow the whistle?**
Anyone who has information; an employee can blow the whistle on his/her employer and vice versa.
- 4. Who receives whistleblower's disclosure and investigates disclosure of misconduct or impropriety?**

Theoretically, it depends on the persons or institutions that the law names; but the global standard practice is that disclosure can be made to any of the following:

- (a) The whistle-blower Act compliant officer in the organization you work
- (b) A police officer
- (c) The Attorney-General
- (d) The Auditor General
- (e) EFCC, ICPC, NDLEA, NBC, Public Complaint Commission (PCC)
- (f) National Human Rights Commission
- (g) A member of the National Assembly
- (h) FIRS
- (i) A State Governor
- (j) The President

5. In what form can the disclosure be made?

By documenting the misconduct or impropriety and making disclosure in writing

6. What your disclosure must contain

The disclosure should include the following:

- (a) Name, Address and Occupation
- (b) The nature of the misconduct
- (c) The name of the person who committed the misconduct or impropriety
- (d) Time and place of the commission of the misconduct
- (e) If there are witnesses-state their names, addresses and descriptions

7. What are the forms of impropriety or misconduct you can blow whistle on?

A breach of Government's Financial Regulations e.g. failure to comply with the Financial Regulations Act, Public Procurement Act, Control & Management Act, and other extant laws.

- Mismanagement or misappropriation of public funds and assets (e.g. properties, vehicles etc.)
- Information on stolen public funds.
- Information on concealed public funds.
- Fraud or corruption or theft.
- Collecting/soliciting bribes.
- Improper conduct or unethical behavior.
- Acts that impact negatively on the integrity of Nigeria.
- Calculated attempt to suppress or conceal any information relating to any of the above.

- Violation of TSA guidelines (e.g. multiple revenue accounts).
- Diversion of revenues.
- Underreporting of revenues.
- Non-remittance or late remittance of revenues.
- Manipulation of revenue collection receipts.
- Conversion of funds to personal use.
- Mismanagement of revenues.

Expenses

- Unapproved expenditures.
- Undocumented expenditures (e.g. no payment vouchers with appropriate signatures).
- Non-compliance with efficiency unit expenditure guidelines/circulars.
- Fraudulent payments.
- Violation of public procurement procedures.
- Procurement fraud (kickbacks, over-invoicing, etc).
- Splitting of contracts.
- Pay-roll breaches e.g. Ghost workers, pension fraud

Ethics/Others

- Manipulation of data or records.
- Misstatement of financial information.
- Mismanagement or misappropriation of public funds and assets (e.g. properties, vehicles etc.)
- Collecting/ soliciting bribes
- Conflict of interest
- Fraud
- Information on stolen public funds
- Information on concealed public funds
- Theft
- Corruption

8. If you cannot write, can you make disclosures?

Yes. So far you have information on misconduct or wrong-doing, you can blow the whistle orally or verbally

9. Steps to be taken on making verbal disclosure

- (a) Ensure your information reduced into writing
- (b) Have the information you provide is read and interpreted to you

- (c) Make a mark on the document, if you can't sign
 - (d) Let there be an affirmation that the document was read to you, explained and interpreted to you.
- 10. What the reporting person/institution must do:**
- The receiving and reporting person or institution must do the following:
- (a) Record the time and place the whistle blowing takes place
 - (b) Give you a receipt showing that you have blown the whistle
- 11. Is there adverse action against whistleblowing?**
- Yes. In many instances there are adverse actions against whistle blowers. Adverse actions, or retaliations, could mean anything from loss of salaries, promotions, bonuses, suspensions and dismissals, to steps reasonably like to defer whistle blowers from making protected disclosures
- 12. Can you be sued for blowing the whistle?**
- You cannot be sued if:
- (a) At the time you believed the misconduct you disclosed was a misconduct under the Act
- 13. Can I be arrested and tried for making false disclosures?**
- Yes. This is what the FAQs of the FMF/FGN policy on whistle blowing policy says: Yes. A first level review will always be carried out to determine credibility and sufficiency of information received. If you report false or misleading information, it will be referred to the enforcement agents for investigation and possible prosecution.
- 14. Can the law protect a whistle blower?**
- Yes. In principle, a whistle blower cannot claim whistle blower protection status in abstraction if there is no actual disclosure of wrong doing and if the person to whom disclosure is made against does not take steps to retaliate. However, the whistle blower Act protects only persons who follow the steps prescribed by the Act. In order to enjoy protection, in the event of adverse actions, a person who makes disclosure must make it to the persons specified by the Act.
- 15. What protections are available to whistle blowers:**
- (a) Law suit- the Act will protect you against legal action or suit
 - (b) Cease and Desist – the Act can order whoever harasses you to cease and desist
 - (c) Identity change
 - (d) Location change

16. What forms of adverse actions or retaliations you are protected against:

- (a) Dismissal
- (b) Suspension
- (c) Redundancy
- (d) Denial of promotion
- (e) Transfer against your will
- (f) Harassment
- (g) Intimidation
- (h) Discrimination
- (i) Sometimes injuries and deaths

17. Who can help you in the face of adverse actions?

- (a) National Human Rights Commission
- (b) Persons specified in the Act
- (c) Lawyers and the Bar Association
- (d) Professional Bodies/Associations, etc

If you feel victimized, do the following:

- (a) Write a complaint to any of the persons specified in the Act or bodies mentioned above, stating your name, address and description
- (b) The name, description and address of the person/institution victimizing you
- (c) The specific acts you consider as amounting to victimization or adverse actions

18. What can Lawyers do?

- (a) Keep tabs on public interest disclosures
- (b) Establish contacts with the whistle blowers
- (c) Initiate legal campaigns and advocacy on behalf of whistleblowers.
- (d) Document all threats on whistleblowers
- (e) Establish relationship with the whistleblowing's investigation and whistleblower's protection teams
- (f) Guide whistle blowers on laws of defamation, generally
- (g) Educate whistle blowers on the consequences of disclosures

19. Should I go public with my disclosure after I have blown the whistle?

No. A disclosure is a confidential process under the Act

20. The benefits of whistle blowing

- (a) It helps the persons specified in the Act to unearth reported cases of corruption
- (b) Corruption and other vices against public trust and accountability are curtailed

- (c) Honesty and probity in public life are enhanced
- (d) Whistle blowers are rewarded monetarily for making disclosures leading to unearthing corruption. In most cases, you are paid between 2.5% to 5% of any money recovered as a result of your disclosure.

Conclusion

Corruption remains almost an intractable problem in Nigeria; but with consistent application of ethical and legal principles, embedded in policy instruments and the legal framework, a handle can be placed on this peculiar problem. Whistleblowing lends itself as a tool for disclosure and for combating corruption; but this cannot happen where there are no clear policy enunciations, will and consideration, and no well-developed regime for whistleblowing and whistleblower protection. As I have expressed in this paper, policy and law have their limits, and they alone cannot combat the menace of corruption, where there are no strong commitments and political will to address corruption in the public sector.

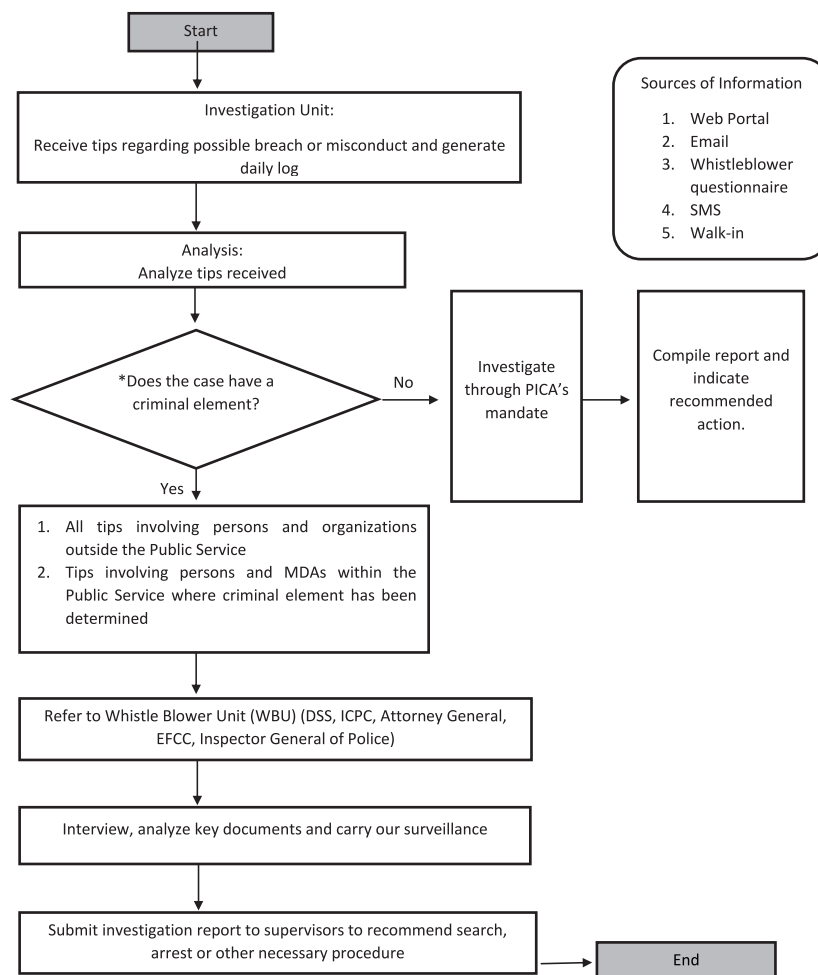
In concluding this paper, I make three proposals here to enhance public policy and the legal regime on whistle blowing and whistle blower protection. First, whistle blowing must have both ethical-moral and legal foundation, giving all the protection from adverse actions and belief that whistle blowing is both a moral and lawful duty to our country. Second, strong and effective legal regime that provides sufficient safeguards for whistle blowers should be established. It is my candid view that a special body which provides protection to whistle blowers must exist. Three, constitutional approval should be given to whistle blowing. Section 15(5) of the Constitution of the Federal Republic of Nigeria, which states that “the state shall abolish all corrupt practices and abuse of power” should be amended to reflect the role of citizens in the fight against corruption.

We can draw from the constitution of Bhutan which provides: “every person shall have the duty to uphold justice and to act against corruption”.

This paper was delivered at a one-day Technical Workshop on Whistleblowing and Federal Government's Whistleblowing Policy for Law Enforcement and Revenue-Generating Agencies in Nigeria, organized by the African Centre for Media & Information Literacy (AFRICMIL), Abuja, Thursday, June 21, 2018.



Whistleblowing Process Flow Chart



All cases where the alleged is a Civil Servant and no immediate evidence of fraud can be determined or where case involves violation of administrative policies and procedures are investigated by the Presidential Initiative on Continuous Audit (PICA).

All cases concerning Public individuals and Civil Servants found to have direct criminal elements are forwarded to the WBU.

***Source:** Presidential Advisory Committee Against Corruption (PACAC).

PARTNERS





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