

# **NATIONAL HUMAN RIGHTS COMMISSION (NHRC)**



## **WHISTLE-BLOWING POLICY**

**Produced by  
ANTI-CORRUPTION AND TRANSPARENCY UNIT (ACTU),  
NHRC**

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## **PREFACE**

Corruption is a global phenomenon, an insidious plague that exists in nearly all societies, regardless of economic or political systems, and thrives in both public and private spheres albeit in varying degrees and has a wide range of corrosive effects on the society. The fight against corruption, its eradication and the entrenchment of good governance are two elements that among others enhance the enjoyment of human rights of a people in any given system.

National Human Rights Commission is mandated to .....

The Management of the NHRC in line with the Circular Ref No OHCSF/MSO/92/94 of the Office of the Head of Civil Service of the Federation deemed it necessary to promote a culture of transparency and accountability in order to prevent unethical practices while curbing corruption within the organization.

The National Human Rights Commission (NHRC) Whistle Blowing Policy is established to promote a culture grounded in ethics, integrity, and accountability across all facets of the Commission's operations. It reflects the organization's commitment to upholding high moral and the ethical principles of transparency and corporate governance, while ensuring that all actions and processes align with its core values and foster public trust. This policy (NHRC Whistle Blowing Policy) supplements the existing Code of Conduct and reinforces the need for staff, partners, stakeholders and the public to act responsibly by reporting any unethical practices, misconduct, or irregularities they may encounter. It aims to cultivate a sense of shared responsibility and create an environment where all stakeholders feel empowered to voice their concerns. By doing so, the Commission seeks to prevent misconduct before it takes hold, and deter actions that could undermine the organization's credibility and effectiveness.

The policy provides a structured, safe framework for raising concerns, ensuring that those who come forward to make complaints on human rights violation abuses are protected from any form of intimidation, harassment, or victimization. It sends a clear message that whistleblowers will not face repercussions for doing the right thing, emphasizing the significance of openness and collaboration in maintaining the Commission's high standards.

The policy seeks to assure the public that all reports received under this policy will be treated with the seriousness it deserves, thoroughly investigated, and handled with transparency and fairness. Outcomes will be communicated to relevant parties, demonstrating the Commission's commitment to accountability. In this way, the policy aims to build trust by showing that concerns are not only acknowledged but acted upon decisively.

Furthermore, the policy provides multiple secure, discreet, and confidential channels for reporting wrongdoing. These mechanisms ensure that individuals can raise complaints or disclose misconduct without fear of exposure, fostering a sense of security and trust. Through this approach, the Commission reaffirms its dedication to good governance, fairness, and the continuous enhancement of its practices and processes.

## **The National Human Rights Commission is committed to its Vision, Mission and Core Values.**

### **Vision**

To be a foremost National Human Rights Institution in the world by entrenching a culture of respect for human rights and promoting national values built on principles of democracy, accountability and respect for rule of law.

### **Mission**

The Commission is committed to prompt response to allegations of human rights violations, advocacy, education, and interventions that encourage national values built on the principles of respect for human and people's rights.

### **Our Core Values**

- \* Equal opportunity
- \* Efficient and effective service delivery
- \* Justice and dignity
- \* Teamwork
- \* Respect for diversity
- \* Transparency and accountability

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## 1.0 INTRODUCTION

The Whistle Blower Policy was approved by the Federal Executive Council in December 2016 in line with the Federal Government of Nigeria's Policy on eliminating corruption in the Public Service, whistleblowing is one of the viable anti- corruption initiatives introduced and promoted to prevent corruption. The Policy is an anti-corruption program that encourages persons to voluntarily disclose information about fraud, bribery, looted government funds, financial misconduct, government assets and any other form of corruption or theft to the Commission.

Whistleblowing is an act of reporting alleged unethical conduct of employees, Management and other stakeholders by an employee or other persons to appropriate authorities.

It is an act of disclosing corrupt practices to the public or relevant authorities with the hope of putting a stop to such practices, usually by an employee and often in a discreet manner.

A whistleblower is, therefore, a person who comes forward and shares his/her knowledge of any wrongdoing, which he/she thinks is happening in an organization or in a specific department.

To effectively coordinate whistleblowing in the Public Service, the Anti-Corruption and Transparency Units (ACTUs) are mandated, as the Ethics and Compliance Units, to develop policies and provide practical platforms upon which staff and stakeholders of their respective Agencies can blow the whistle on any wrongdoing.

Against this backdrop, the Anti-Corruption and Transparency Unit of the National Human Rights Commission has developed this whistleblowing policy to encourage staff, stakeholders and the general public who are hereinafter referred to be 'whistleblower' to make reports/complaints or give information on issues such as bribery, fraud, theft, mismanagement, dishonesty, corruption, sexual harassment and other unethical conducts,

wrongdoings or misconducts as contained in the Public Service Rules or the relevant anti-corruption laws applicable in Nigeria, observed in the operations of the Commission.

For this policy to achieve its aims, staff and stakeholders of the Commission are to play a vital role in actively reporting wrongdoings as seen around them. Management is also expected to take prompt and appropriate steps to correct issues brought to its attention. This policy has its background in the provisions of the Public Service Rules, Corrupt Practices and Other Related Offences Act, 2000, as well as other relevant anti-corruption laws in Nigeria.

## **2.0. POLICY OBJECTIVE**

The National Human Rights Commission's Whistle Blower Policy is designed to ensure the highest ethical, moral and business standards in the course of functioning and to build a lasting and strong culture of Corporate Governance within the Commission.

The willingness and cooperation of employees to make reports/complaints about suspected misconduct, malpractice, corruption and abuse of office that would promote accountability, transparency and probity as well as check corrupt practices, mismanagement and abuse of office. This policy seeks to achieve the following:

- a. To promote a culture of openness, accountability and Integrity;
- b. To create an enabling environment where staff, stakeholders and the general public can timely report any act of misconduct, sharp practices and other irregularities;
- c. To create an awareness that reports made would be taken seriously, investigated and the outcome;
- d. To provide a discreet and confidential channel form making reports or raising complaints against observed wrongdoings;

- e. To ensure that whistleblowers report any wrongdoing devoid of fear of harassment, intimidation or victimization;
- f. To serve as a deterrent against malpractices, irregularities or misconducts;

### 3.0 WHO IS A WHISTLE BLOWER

- 1. Whistle Blowing is an act of.....
- 2. Who is a Whistle Blower is.....

### 5.0 ROLE OF THE ANTI-CORRUPTION AND TRANSPARENCY UNIT (ACTU)

The Anti- Corruption and Transparency Unit in Ministeries, Departments and Agencies is an approved initiative of the Independent Corrupt Practices and Other Related Offences Commission (ICPC) established in 2001 in collaboration with the Office of the Head of Civil Service of the Federation set up as an in-house check mechanism to review operations, lapses in organization and address issues of unethical practices.

The Standing Order Rule 7.0 empowers ACTU to carry out its assigned duties amongst which is preliminary investigation into complaints received, and assist management in the implementation of the Policy.

### 4.0. WHO IS A WHISTLE BLOWER?

Definitions of Key Terms below:

WHAT IS WHISTLE BLOWING: Whistle Blowing is an act .....

WHO IS A WHISTLE BLOWER: They include employees of the Commission or External Person/Bodies making a disclosure under this policy. The Whistle Blower's role is that of a reporting party. Whistle Blowers are not investigators or finder of facts.

- Employee: The staff of the Commission to whom disclosure is being made.

- Employees: All employees of the Commission.
- Disclosure: Any communication, whether by letter/ email, relating to unethical practice or behavior or violation of service rules, made in good faith by the Whistle Blower.

#### 4.0 QUALITIES OF A WHISTLE BLOWER

#### 5.0 WHO SHOULD WHISTLE BLOW

Any individual who has observed reportable misconduct can report his / her concerns to appropriate authority as prescribed by this Policy, provided they are made in good faith, and the disclosure is true and reasonable.

All staff should ensure that appropriate steps are taken to disclose any wrongdoing or malpractice of which they become aware as non-action/concealment will be deemed as complicity. The disclosure should be made to an appropriate authority.

#### 5.0 WHAT ACTS CAN BE REPORTED

This document enables whistle blowers report acts of impropriety which include:

- All forms of financial malpractice or impropriety such as embezzlement, fraud, diversion of funds, theft, misuse of official property etc.

Mismanagement on stolen public funds.

- Information on stolen public funds.
- Information on concealed public funds.
- Collecting/ soliciting bribes.

- Sexual or physical abuse of any staff and other relevant stakeholders
- All issues bordering on offences under the Corrupt Practices and
- Other Related Offences Act, 2000 some of which are as listed below:
  - a. Acceptance of bribe or gratification by an official either directly or through an agent;
  - b. Demand for bribe or gratification from Stakeholders or any person;
  - c. Using front companies to obtain contracts from the office;
  - d. Making false statements or returns with respect to monies or property entrusted to staff or such other persons in relation to the activity of the Commission;
  - e. Offer and acceptance of gratification by staff of the Commission as an inducement or reward for performance of duty;
  - f. Bribery for giving assistance with regard to contracts services of the Commission etc.
  - g. Abuse of office by staff for personal benefit of oneself, relation or associate; and
  - h. Withholding, receiving or concealing gratification.
  - i. All other forms of wrongdoings, unethical practices and corrupt activities noticed by staff, stakeholders and the general public.

## 6.0 REPORTING MECHANISMS

This Whistle-Blowing Procedure provides a mechanism for reporting any unlawful conduct at work while providing reassurance that exposing wrongdoings would not pose any risk to the whistle-blower. The whistle-blower should however, make it clear that they are making their disclosure within the scope of the whistle-blowing policy.

Without prejudice to the rights of whistleblowers to make a report to the relevant authorities outside the Commission, a report to be made internally, shall be done either verbally or in writing through any of the following means:

### 6.1 WHOM TO REPORT TO:

1. The Management of the National Human Rights Commission and the Anti- Corruption and Transparency Unit ACTU .
2. Written report submitted electronically via dedicated whistle blowing e-mail: [nhrcactu@nhrc.gov.ng](mailto:nhrcactu@nhrc.gov.ng)
3. Dedicated Channel via Toll free lines

To make a report, whistleblowers are encouraged to provide full details, and where possible, supporting evidence, for such reports to be treated without delay. All reports received shall be treated expeditiously and without prejudice to whoever is concerned likely outcomes of submitted reports could be as follows:

## 7.0 WHISTLE BLOWER'S PROTECTION

The Management of the National Human Rights Commission in creating an enabling and protecting work environment, protects the identity of the whistleblower who provides full evidence of any complaint brought before it.

In view of the protection afforded to a Whistleblower's bona fide concern, it is preferable that individuals put his/her name and contact details in

view of any correspondence for correspondence to any disclosure. The identity of the whistleblower shall be kept confidential.

In the same vein, the Management of the Commission prohibits victimization and frowns against discrimination of staff. It also abhors submission of false information while guaranteeing the protection of information and the informants as enshrined in Section 64 (1)(2) of the ICPC Act, 2000.

In the same vein, the Management of the

### **7.1. WHAT ARE THE STEPS IN THE WHISTLEBLOWING PROCESS?**

**In ensuring that the Commission does not engage in frivolous and petty complaints, the following are steps that should be taken into consideration:**

- Step 1 - Get Evidence. This is the most important step in the whistleblower's claim.
- Step 2. Present the Evidence.
- Step 3- Allow for Appropriate Investigation.
- Step 4 - Findings and Result/Conclusion of Investigation.

### **7.2. HOW DO YOU WHISTLEBLOW?**

- Blow the whistle at the right time.
- Blow the whistle when you are obliged to.
- Blow the whistle according to the National Human Rights Commission's Policy.
- Keep a record of your information /supporting evidence
- Be very careful about the words you use.
- Only blow the whistle on unlawful activity (activities)
- Report - not investigate.

## **8.1. Investigating Process of Concern(s) Reported by an Internal Whistle-blower**

The Chairman (ACTU) shall within two business days of receipt of the concern from the whistle-blower:

- Acknowledge receipt of the issue(s) raised; and
- Commence review to ascertain validity of claim and also determine whether the concerns fall within the scope of whistle-blowing or not.

The purposes of investigation are to:

Establish if a wrongdoing has occurred based on the concern(s) raised, and if so, to what extent; and

To minimize the risk of further wrongdoing, prevent any further loss of assets, damage to the reputation of the Commission and if possible, protect all sources of evidence.

The Chairperson (ACTU) shall, upon conclusion of the investigation, submit a detailed report to the Executive Secretary for appropriate actions in line with the approved whistleblower's policy of the Commission.

Where necessary, the Chairman (ACTU) will keep the whistle-blower informed of progress and the outcome of the investigation, within the constraints of maintaining confidentiality or observing legal restrictions generally.

If dissatisfied with the outcome of the investigation, a whistle-blower may have recourse to the Chairman, ICPC, which will not affect the fundamental right of the internal whistle-blower to seek redress in the court of law.

## **8.2. Investigating Process of Concern(s) Reported By An External Whistle-Blower**

External whistle-blowers could be complainants, respondents, stakeholders, suppliers, service providers and other members of the public

who report wrong doings of employees to the NHRC Chairperson, Executive Secretary or the Chairperson (ACTU). An external whistle-blower may raise concerns either by declaration or anonymously through any of the following:

- Formal letter to the NHRC Chairperson, Executive Secretary, with copy to the Chairperson, (ACTU)
- Call or text to the dedicated phone number [Chairperson, ACTU];
- Dedicated whistle-blowing e-mail: [nhrcactu@nhrc.gov.ng](mailto:nhrcactu@nhrc.gov.ng) and

changes to any of the channels detailed above would be promptly communicated to all stakeholders by the NHRC through the approved channels.

Where the concern is received by staff other than the Chairperson, Executive Secretary or the Chairman, (ACTU), the staff to which the concern was directed shall be required to document and immediately forward the concern(s) to the Chairperson, Governing Board, Executive Secretary and a copy to the Chairperson, (ACTU).

If the concerns affect the Top Management, the Chairperson (ACTU) would be notified, with a copy sent to the Executive Secretary.

## **9.0. PROTECTION, SUPPORT AND COMPENSATION FOR WHISTLE-BLOWERS**

The Commission has an obligation to adequately protect the whistle-blower (s). Therefore, reprisals against any employee who in good faith reports a concern about illegal or unethical conduct will not be tolerated.

The Commission is also committed to maintaining confidentiality to the fullest extent possible and provide assurance that all reports will be subject to appropriate investigation and conclusion through an efficient process.

Therefore, whistle-blowers are encouraged to disclose their names when filing reports to enhance credibility.

All whistleblowers under this policy shall be protected from any form of reprisal, harassment, intimidation, victimization or disciplinary action as a result of any disclosure, where the disclosure is made in good faith and is not made maliciously or for personal gain. Whistleblowers' protection is guaranteed by the provisions of Section 6 of the Corrupt Practices and Other Related Offences Act, 2000, and is one of the Commission's Commitment under the policy.

The Commission will protect the confidentiality of the complainants and their names / identity will not be disclosed except as statutorily required under law.

However, anonymous disclosures may be considered on the following discretionary basis:

- i) The seriousness of the issues;
- ii) The significance and credibility of the concerns; and
- iii) The possibility of confirming the allegation.

Whistle-blowers, either internal or external, may be rewarded depending on the gravity of the case. Compensation may also be provided to whistle-blowers who may have suffered loss in the course of the process. This is however at the discretion of the Chairperson, Governing Board or the Executive Secretary.

## **10.0. CONFIDENTIALITY AND ANONYMOUS REPORTING**

Any report given by any known person shall be treated with utmost confidentiality. To further guarantee confidentiality, whistleblowers are encouraged to report anonymously if they are not comfortable disclosing their identities. Where reports are made anonymously, enough facts and evidence should be provided to substantiate issues contained in the report.

The complaints received under Whistle Blower will be opened by the addressee only.

## **11.0. COMMITMENT TO THE POLICY**

The Management of the Commission shall be committed to the highest standard of good ethics, honesty, openness and accountability this would enhance good governance by promoting an effective implementation of this policy. Conversely, in making reports against acts of corruption, whistleblowers under this policy should be ready to be committed to the highest possible standards of openness, probity and accountability in fulfillment of their basic responsibility as citizens.

## **13.0. TIME LIMIT FOR INVESTIGATION**

In line with this policy, the Commission is committed to prompt resolution of all concerns or issues raised within a period of one month. In the event that the investigation of whistle-blowing complaint was not concluded promptly, the Chairperson (ACTU) must keep the Chairperson, Governing Board and Executive Secretary abreast of any progress made on the investigation into the complaint made.

## **14.0. FEEDBACK MECHANISM**

Upon receipt of a report or complaint, an acknowledgment of the receipt, status of report and actions taken would be communicated to the whistleblower. Whistleblowers are, therefore, advised to provide viable channels of communication for appropriate feedbacks in their report and for further communication in case an external legal action follows from the disclosure and the employee's evidence is required in Court.

**APPROVAL**

This Policy was approved and adopted by the Management of the National Human Rights Commission for the overall good and promotion of accountability and transparency within the Commission.

This.....Day of.....2024



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