

April 13, 2026

TL2026/0413/1A

Advisor to Prime Minister  
Prime Minister House  
Islamabad

(For attention of the Honorable Prime Minister)

**Subject: Prolonged Delay in the Enactment of the Whistleblower Protection and Vigilance Commission Act, 2025, Pending Approval of the National Assembly of Pakistan Since May 2025 and Affecting Pakistan's Commitments under UNCAC and IMF Governance and Corruption Diagnostic Assessment**

Honorable Prime Minister,

Transparency International Pakistan respectfully refers to its earlier letter dated June 21, 2024 (Ref: TL2024/0621/1F) regarding the enactment of a federal whistleblower protection law in line with Pakistan's commitments under Articles 8.4 and 13.2 of the United Nations Convention against Corruption (UNCAC) (Annex-A).

TI Pakistan acknowledges with appreciation the progress made during 2025, including the approval of the Whistleblower Protection and Vigilance Commission Bill, 2025 by the Federal Cabinet the Senate Standing Committee on Law (Annex-B). These developments reflect a strong political commitment and institutional recognition of the importance of whistleblower protection in strengthening governance frameworks.

However, almost a year has passed, and the Whistleblower Protection and Vigilance Commission Bill 2025 is pending approval from the National Assembly of Pakistan. The latest IMF Governance and Corruption Diagnostic Assessment has pointed out that a robust whistleblower protection regime in Pakistan is imperative for participatory government and deterring corruption. One of the key recommendations on Anti-Corruption include Rec 11: "*Establish a Whistleblower Protection regime and form a Whistleblower Protection and Vigilance Commission*" (Annex-C).

It may also be noted that Pakistan ratified UNCAC in 2007, which under Articles 8.4 and 13.2 calls for the establishment of effective reporting mechanisms and protection against retaliation for reporting persons. Enactment of the Whistleblower Protection and Vigilance Commission Act 2025 will therefore contribute significantly to reinforcing institutional integrity, strengthening public trust, and demonstrating Pakistan's commitment to global anti-corruption frameworks.


TI Pakistan also appreciates the ongoing efforts for the implementation of Reform Action No. 11 under Prime Minister Economic Governance Reforms (PMEGR) which includes conducting National Risk Assessment on Corruption, including the identification of top high-risk sectors, as well as devising of risk reduction action plan (Annex-D). In this regard, effective whistleblower protection is widely recognized as a key pillar of transparency and accountability, enabling early detection of corruption, financial mismanagement, and regulatory violations, particularly in high-risk sectors.

Transparency International Pakistan requests the Honorable Prime Minister to issue directives for the enactment of Whistleblower Protection and Vigilance Commission Bill 2025.

Transparency International Pakistan is striving for across-the-board application of Rule of Law, which is the only way to stop corruption, and achieve Zero tolerance against corruption.



Regards,

  
(Advocate Daniyal Muzaffar)  
Trustee / Legal Advisor  
Transparency International Pakistan

Copies forwarded for the information with request to take action under their mandate to:

1. Honorable President, President House, Islamabad
2. Honorable Chairman, Senate of Pakistan, Islamabad
3. Honorable Speaker, National Assembly of Pakistan, Islamabad
4. Chairman, National Accountability Bureau, Islamabad

**Note:**

This is to clarify that Transparency International Pakistan is not a complainant, it acts as a whistleblower and operate under Article 19-A, of the Constitution of Pakistan which gives the right to public to know how government is being run by public officers. Article 19-A makes the right to access of information pertaining to a public authority a fundamental right, and a three member bench in case of Mukhtar Ahmad Ali vs the Registrar, Supreme Court of Pakistan, Islamabad, headed by Chief Justice Qazi Faez Isa in the landmark judgment on 16 October 2023, in CP No. 3532/2023, has declared that

“What previously may have been on a need-to-know basis Article 19A of the Constitution has transformed it to a right-to-know, and the Access to information is no longer a discretion granted through occasional benevolence, but is now a fundamental right available with every Pakistani which right may be invoked under Article 19A of the Constitution”



# TRANSPARENCY INTERNATIONAL - PAKISTAN

Annex-A

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Email: ti.pakistan@gmail.com  
Website: www.transparency.org.pk

June 21, 2024

TL2024/0621/1A

Honorable Prime Minister of Pakistan  
Prime Minister House  
Islamabad

**Subject: Enactment of Whistleblower Protection Law at the Federal Level in line with Pakistan's  
Commitment under Article 8.4 and 13.2 of UNCAC**

Dear Honorable Prime Minister,

Transparency International Pakistan would like to draw your attention towards a delay in the enactment of Whistleblower Protection Act at the federal level in Pakistan. For the progress of integrity and eliminating corruption from the country and fostering an environment where citizens can report misconduct without fear of retaliation, effective whistleblower protection law is essential.

TI Pakistan recognizes the fact that there have been attempts to introduce whistleblower protection legislation in the past, including on May 2, 2019, when Whistleblower Protection and Vigilance Commission Act, 2019 bill was presented in the National Assembly. However, it was later withdrawn, and as a result, the federal legislation on whistleblower protection remains absent. It is important to emphasize that the passage of whistleblower protection legislation in matters of public interest also aligns perfectly with the mandate of the incumbent government that aspires to empower people by giving them a voice in shaping policies.

The Government of Pakistan ratified United Nations Convention against Corruption (UNCAC) in 2007. Article 8.4 and 13.2 of UNCAC mandate governments to implement legal measures that protect whistleblowers, as quoted below.

*UNCAC Article 8. Codes of conduct for public officials (4): Each State Party shall also consider, in accordance with the fundamental principles of its domestic law, establishing measures and systems to facilitate the reporting by public officials of acts of corruption to appropriate authorities, when such acts come to their notice in the performance of their functions.*

*UNCAC Article 13. Participation of society (2): Each State Party shall take appropriate measures to ensure that the relevant anti-corruption bodies referred to in this Convention are known to the public and shall provide access to such bodies, where appropriate, for the reporting, including anonymously, of any incidents that may be considered to constitute an offence established in accordance with this Convention.*

TI Pakistan has prepared a draft proposal on Whistle Blower Protection law, based on the best practices globally (**Annex-A**). In the past, TI Pakistan has advocated with the federal and provincial governments for the enactment of Right to Information laws which are now in place at the federal and provincial levels.

TI Pakistan requests the honorable Prime Minister to issue directives for the enactment of federal law regarding the reporting and protection of whistle-blowers, which includes adequate reporting mechanisms and protective measures, in line with the UNCAC requirements.

Transparency International Pakistan is striving for across-the-board application of Rule of Law, which is the only way to stop corruption, and achieve Zero tolerance against corruption.

With Regards,

Advocate Daniyal Muzaffar  
Trustee/Legal Advisor  
Transparency International Pakistan

Copies forwarded for the information with request to take action under their mandate to:

1. Registrar, Supreme Court of Pakistan, Islamabad

**A NON-PARTISAN, NON-PROFIT COALITION AGAINST CORRUPTION**

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## News Detail



Event Title: Senator Farooq Hamid Naek, Chairman Senate Standing Committee on Law and Justice Presiding over a Meeting of The Committee at Parliament House Islamabad

Event Date: 2025-05-16

The Senate Standing Committee on Law and Justice, chaired by Senator Farooq Hamid Naek, convened today in Islamabad to deliberate on key legislative matters aimed at strengthening transparency and accountability within the justice system.

The meeting was attended by Senators Shahadat Awan and Zamir Hussain Ghumro, along with Federal Minister for Law and Justice, Senator Azam Nazeer Tarar.

The Committee unanimously passed “The Whistleblower Protection and Vigilance Commission Bill, 2025” following a comprehensive briefing by the Ministry of Law and Justice. The Ministry informed the Committee that although a legal framework for whistleblower protection has existed since 2017, it has remained largely dormant due to lack of enforcement. The new bill introduces significant reforms, most notably the establishment of an independent Whistleblower Protection and Vigilance Commission tasked with receiving disclosures, ensuring anonymity, and protecting whistleblowers from retaliation.

Senator Naek emphasized that institutionalizing whistleblower protection is vital to restoring public trust in governance and promoting a culture of accountability.

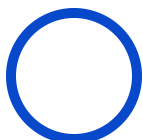
The Committee also took up The Pakistan Penal Code (Amendment) Bill, 2025, which proposes amendments to the provisions relating to diyat (compensation for unintentional homicide). The proposed changes include increasing the standard amount of diyat to thirty thousand six hundred rupees along with thirty-six grams of silver. An alternate clause suggests payment of either two thousand grams of gold or one-fourth of the total estate and resources of the convicted individual.

Members of the Committee voiced serious reservations about the practicality and implications of these amendments. Particular concern was raised over whether the Government could lawfully make such payments on behalf of a convict. Senator Azam Nazeer Tarar also expressed skepticism, noting that the proposed figures would place an undue financial burden on individuals and may not be feasible to implement equitably.

In light of these concerns, the Committee resolved to seek guidance from the Council of Islamic Ideology and to invite the Ministry of Interior to share its perspective on the proposed amendments at the next meeting.

Consideration of the remaining legislative items on the agenda was deferred due to the absence of the Members-in-Charge of those bills.

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## Senate panel passes whistleblower protection bill

committee members voice serious reservations about the practicality and implications of these amendments

By Asim Yasin May 17, 2025



Chairman Senate Standing Committee on Law and Justice Senator Farooq Hamid Naek presides over the committee meeting at the Parliament House Islamabad on May 16, 2025. — Facebook@Pakistansenate

ISLAMABAD: The Senate Standing Committee on Law and Justice on Friday unanimously passed “The Whistleblower Protection and Vigilance Commission Bill, 2025” aimed at strengthening transparency and accountability within the justice system.

The Senate Standing Committee on Law and Justice was presided over by Senator Farooq H Naek on Friday which deliberated on key legislative matters aimed at strengthening transparency and accountability within the justice system. The Committee unanimously passed “The Whistleblower Protection and Vigilance

Commission Bill, 2025” following a comprehensive briefing by the Ministry of Law and Justice.

The Ministry of Law and Justice informed the Committee that although a legal framework for whistleblower protection has existed since 2017, it has remained largely dormant due to lack of enforcement. The new bill introduces significant reforms, most notably the establishment of an independent whistleblower protection and vigilance commission tasked with receiving disclosures, ensuring anonymity, and protecting whistleblowers from retaliation. Senate Standing Committee on Law and Justice Chairman Senator Farooq H Naek said that institutionalising whistleblower protection is vital to restoring public trust in governance and promoting a culture of accountability.

The Committee also took up The Pakistan Penal Code (Amendment) Bill, 2025, which proposes amendments to the provisions relating to Diyat (compensation for unintentional homicide). The proposed changes include increasing the standard amount of Diyat. An alternate clause suggests payment of either 2000 grams of gold or one-fourth of the total estate and resources of the convicted individual was also discussed.

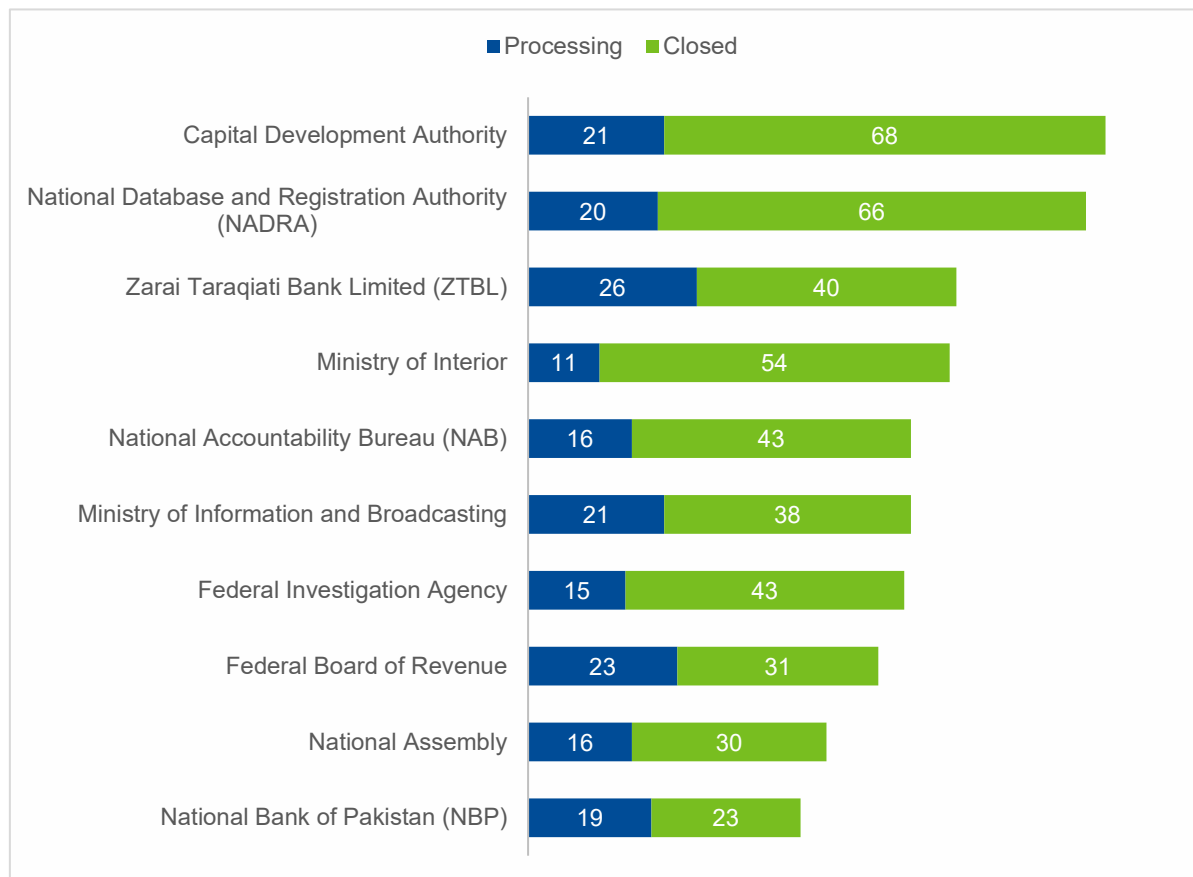
The members of the committee voiced serious reservations about the practicality and implications of these amendments. Particular concern was raised over whether the government could lawfully make such payments on behalf of a convict. Federal Minister for Law Senator Azam Nazeer Tarar also expressed skepticism, noting that the proposed figures would place an undue financial burden on individuals and may not be feasible to implement equitably.

In light of these concerns, the Committee resolved to seek guidance from the Council of Islamic Ideology and to invite the Ministry of Interior to share its perspective on the proposed amendments at the next meeting, while the consideration of the remaining legislative items on the agenda was deferred due to the absence of the members-in-charge of those bills.

The meeting was attended by Senators Shahadat Awan and Zamir Hussain Ghumro, along with Federal Minister for Law and Justice Senator Azam Nazeer Tarar.

contribute to greater accessibility of the system (online filing and monitoring) and its efficiency (timeliness of actions, and consistency of approaches).

**Figure 16. Appeals of RTI Requests heard by Information Commission (2022-24)**



Source: Information Commission, IMF Staff Calculations

**394. A robust whistleblower protection regime in Pakistan will also help promote participatory government and expose corruption.** Except for the province of Khyber Pakhtunkhwa which adopted a law in 2016, there is currently no legal framework for whistleblower protection and reporting mechanisms in Pakistan. Previous attempts to introduce such legislation at the federal level in 2019, however, did not succeed (Whistleblower Protection and Vigilance Commission Act, 2019). Notably, a bill has been tabled in the National Assembly in April 2025, which would also establish an autonomous Whistleblower Protection and Vigilance Commission. Given the strong patronage networks, public officials or persons who witness or are privy to corruption dealings are discouraged from reporting corrupt activities since they could face harassment, retaliation or recrimination. Passage and implementation of this important framework ensures that such whistleblowers are protected and thus should be prioritized.

**Table 19. Recommendations on Anti-Corruption**

Recommended Action	Responsible Authority	Action Objective	Timeline
1. Adopt and implement a risk-based approach to addressing corruption vulnerabilities in federal agencies by: (i) publishing an action plan to mitigate risks in the top ten agencies with highest corruption risks and macro-critical exposures based on a centralized assessment using pre-established and public criteria (Year 1); and (ii) annually reporting on implementation progress and risk reduction outcomes in these agencies (Year 2).	NAB, FIA, PACEs	Understand risks	<b>ST</b>
2. Enhance the NAB's independence and effectiveness in investigating high-level corruption by strengthening appointment procedures of its head, enhancing investigative capacities and establishing robust internal accountability.	NAB	Enhance institutional independence and effectiveness	<b>MT</b>
3. Consider establishing a centralized authority to collect, digitize and publish asset declarations of high-level public officials with adequate powers and resources to conduct risk-based verification.	FBR, Establishment Division, Parliament	Promote transparency and accountability	<b>LT</b>
4. Demonstrate increased information sharing by making use of protocol among NAB, AGP and FBR to assess corruption risks and identify suspicious transactions/behaviors for further investigation.	NAB, AGP, FBR	Promote inter-agency coordination	<b>MT</b>
5. Strengthen FIA's investigative capacities on corruption offenses and deepen coordination and collaboration with NAB.	FIA	Enhance effectiveness	<b>MT</b>
6. Enhance the independence of Provincial Anti-Corruption Establishment by removing the requirement for approval of higher authorities for corruption investigations, enhancing investigative capacities, and establishing robust internal accountability mechanisms.	PACEs	Enhanced effectiveness and independence	<b>MT</b>
7. Strengthen the independence of the accountability courts by establishing a transparent and merit-based process for appointing judges and begin publishing performance information based on a robust framework.	Ministry of Law and Justice	Strengthen efficiency of adjudication of corruption cases	<b>MT</b>

8. Strengthen accountability and integrity among high-level federal civil servants by initiating the publication of asset declarations in 2026, and introduce risk-based verification of asset declarations.	NAB, FBR and Establishment Division	Promote transparency and accountability	<b>ST</b>
9. Pursue membership in key international networks for sharing of information and transparency, including the Egmont Group, ARIN and Open Government Partnership.	National AML/CFT Authority, FMU, NAB	Improve access to cross-border information and transparency	<b>MT</b>
10. Ensuring proactive disclosure of information by public agencies and improving responsiveness to RTI requests.	Information Commission	Enhance transparency and access to information	<b>MT</b>
11. Establish a Whistleblower Protection regime and form a Whistleblower Protection and Vigilance Commission.	Ministry of Law and Justice	Safeguard whistleblowers and strengthen accountability	<b>MT</b>

**Table 20: Reform Action 11 – Priority Action Items**

<b>Reform Action 11:</b>				
Adopt and implement a risk-based approach to addressing corruption vulnerabilities in federal agencies by:				
3.8 publishing an action plan to mitigate risks in the top ten agencies with highest corruption risks and macro-critical exposures based on a centralized assessment using pre-established and public criteria (year 1); and				
(ii) reporting annually on implementation progress and risk				
#	Achievements	Action items	Institution Responsible	Timelines
Publishing an action plan to mitigate risks in the top ten agencies with highest corruption risks and macro-critical exposures based on a centralized assessment using pre-established and public criteria (year 1);				
11.1	Under the auspices of the FATF, Pakistan completed its first national Money-Laundering / Terrorist-Financing (ML/TF) risk assessment in 2017 which was updated in 2019. NRA was again done in 2023, updating Pakistan’s risk profile for ML/TF and revising threat/vulnerability ratings. Corruption has been rated high-risk offense for ML.	<p><b>11.1 Conduct National Risk Assessment on Corruption</b></p> <p>NAB will draft a national risk assessment on corruption, and to achieve multiagency inputs bring it to National Anti-Corruption Task Force (chaired by AMLA and including NAB, FIA, AGP, ACEs, AGP, SECP, FBR, CGA, PBS, and others coopted by the task force as technical contributors). The task force will be established under the umbrella of AML/CFT Authority, as the overarching coordinating body for all “competent authorities”, (as per Section 6 (1) of National AML/CFT Authority in Pakistan Act 2023), e.g. NAB, FIA and all anticorruption establishments ACEs and other relevant agencies, to finalise a centralized Corruption Risk Assessment Framework for assessing the corruption vulnerabilities in various organisations.</p> <p>Such Framework to include, in addition to financial crime risk, non-financial corruption vulnerabilities (e.g. procurement irregularities, project implementation corruption, misuse in state-owned enterprises, governance of macro-critical agencies, systemic governance weaknesses such as weak oversight, lack of transparency, politicized spending, etc.).</p> <p>Subject matter specialists may be hired/attached to support the task force.</p>	<p>NAB (Technical Lead)</p> <p>AML/CFT Authority (Interagency Coordination)</p> <p>Task Force NAB, FIA, ACEs,</p> <p>MOF</p>	06/2026

11.2		<p><b>11.2 Identify Top 10 High Risk Agencies</b></p> <p>Based on the Corruption Risk Assessment Framework, the National Anti-Corruption Task Force will identify top 10 high risk federal agencies with corruption vulnerabilities and macro-critical exposures.</p>	<p>AML/CFT Authority (Lead)</p> <p>Task Force NAB, FIA, ACEs, MOF</p>	06/2027
11.3		<p><b>11.3 Devise Risk Reduction Action Plan</b></p> <p>National Anti-Corruption Task Force will devise risk reduction action plan, with clear KPIs, and roles for each ministry/agency to undertake actions and to mitigate risks in the top ten agencies with highest corruption risks comprising of:</p> <ol style="list-style-type: none"> <li>i. Systemic actions common to all</li> <li>ii. Agency specific actions</li> </ol> <p>It will also align risk assessment methodology with Pakistan's National Risk Assessment (NRA) for ML/TF.</p>	<p>Task Force NAB, FIA, ACEs, MOF</p> <p>10 identified agencies</p>	06/2027
Reporting annually on implementation progress and risk				
11.4		<p><b>11.4 Strengthen Institutional Capacity to Supervise Implementation and Monitor Progress</b></p> <p>Create an Implementation Unit (IU) inside AML/CFT Authority or Cabinet Division, in consultation with NAB, to monitor implementation of the RR Action Plan devised by the Task Force.</p>	<p>Cabinet Division</p> <p>NAB/ AML/CFT Auth</p> <p>Task Force FIA, ACEs MOF</p>	06/2027
11.5		<p><b>11.5 Ensure Effective Monitoring Through Reports</b></p> <p>Prepare an Annual Corruption Risk &amp; Reform Status Report including:</p> <ul style="list-style-type: none"> <li>• Progress on KPIs for each of the 10 agencies.</li> <li>• Updated corruption risk ratings (risk assessments to be done annually).</li> <li>• Challenges, lessons learned, and next-year priorities.</li> </ul>	<p>AML/CFT Auth (Lead)</p> <p>Task Force NAB, FIA, ACEs Cabinet Division</p> <p>MOF</p>	06/2028