

# Constitutional, Legal, and Procedural Perspectives on Witness Protection: A Comparative Study of Nigeria, India, and the United States

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## Abstract

Witness protection is indispensable to the effective administration of justice because witnesses who face intimidation, retaliation, or violence are less likely to cooperate with law enforcement and judicial institutions. Despite growing scholarship on witness protection, comparative studies rarely examine how constitutional foundations, legal frameworks, and administrative enforcement mechanisms interact across jurisdictions with different levels of institutional development. This article aims to analyse the constitutional, legal, and procedural dimensions of witness protection in Nigeria, India, and the United States in order to identify major weaknesses, institutional contrasts, and reform lessons. Using doctrinal legal research combined with a comparative approach, the study examines constitutions, statutes, policy instruments, judicial decisions, and relevant scholarly literature from the three jurisdictions. The study finds that the United States has the most institutionalised and effective witness protection regime, supported by a clear statutory basis, administrative coordination, and sustained state capacity. India has made important progress by constitutionalising witness protection through judicial intervention and by adopting the Witness Protection Scheme, but its implementation remains uneven due to procedural delays, inter-state disparities, and limited resources. Nigeria, by contrast, continues to face the most serious structural deficiencies, including weak institutional coordination, restricted legal coverage, political interference, corruption, and inadequate funding. The novelty of this article lies in its integrated comparison of constitutional recognition, legal design, and practical enforcement across three contrasting systems, showing that effective witness protection depends not only on legal rules but also on institutional autonomy and administrative capacity. The article

argues that reform in Nigeria and further consolidation in India must be grounded in each country's socio-political and legal context.

**KEYWORDS:** *Witness Protection; Criminal Justice System; Procedural Justice.*

## Introduction

Truth and justice form the foundation of any society governed by the rule of law. Without them, society begins to crumble, impunity thrives unimpeded, and the basic rights of the citizenry become almost nonexistent; reduced to nothing but mere postulations. Every justice system is as strong as the people and institutions who participate in it.<sup>1</sup> The police, public prosecutor, defense lawyer, witness, judge, jury and the corrections personnel, are all key pillars in the justice system of any society.<sup>2</sup> Indeed, witnesses are indispensable in the administration of justice because their testimonies often aid in the understanding and interpretation of the circumstances surrounding a crime, the details of the crime itself, and, eventually, the final conviction.<sup>3</sup> In societies where witnesses continuously face threats, different forms of intimidation, and in some cases violent attacks, the sanctity of the criminal justice system is not only threatened, but its essence is also significantly undermined.<sup>4</sup> Witnesses are integral to any successful justice system; when and where they are protected and secured, they are more likely to cooperate with the justice sector in bringing perpetrators of crime to justice.<sup>5</sup>

Observably, the frameworks, mechanisms, implementation, and systems of witness protection differ between countries, often dictated and shaped by certain unique constitutional, legal traditions, political customs, and institutional characteristics. The limited previous studies on witness protection programs have been focused either on a single jurisdiction<sup>6</sup> or a comparative analysis of more developed

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<sup>1</sup> Nur Rochaeti et al., "A Restorative Justice System in Indonesia: A Close View from the Indigenous Peoples' Practices," *Sriwijaya Law Review* 7, no. 1 (2023), <https://doi.org/10.28946/slrev.Vol7.Iss1.1919.pp87-104>.

<sup>2</sup> Sony Cipto Leksono et al., "CRIMINAL JUSTICE SYSTEM IN THE PERSPECTIVE OF INTEGRATION," *International Journal of Asia Pasific Collaboration* 1, no. 3 (2023).

<sup>3</sup> Babajide Olatoye Ilo and Adekunbi Folashade Imosemi, "Prospect and Challenges of Criminal Procedures in Nigeria: A Review," *Unnes Law Journal* 8, no. 2 (2022), <https://doi.org/10.15294/ulj.v8i2.56482>.

<sup>4</sup> Ni Nyoman Juwita Arsawati et al., "Comparative Analysis of Witness Protection Law in Indonesia, Malaysia, and Australia," *Journal of Indonesian Legal Studies* 9, no. 2 (2024), <https://doi.org/10.15294/jils.v9i2.1498>.

<sup>5</sup> F Waziri-Azi - European Journal of Research in Social and 2019, "Legal Framework of Witness Protection Measures during Criminal Trial in Nigeria and Emerging Practices," *European Journal of Research in Social Sciences Vol 7, No. 1 (2019)*. 7, no. 1 (2019).

<sup>6</sup> Suzzie Onyeka Oyakhire, "Protection of Victim-Witnesses of Human Rights Violations in Criminal Prosecutions in Nigeria," *The Transnational Human Rights Review* 8, no. 1 (2021): 61–87, <https://doi.org/10.60082/2563-4631.1098>.

justice system like the USA, UK, France, Indonesia, Australia, India, etc.<sup>7</sup> Most of them lacks rigorous framework that compare constitutional imperatives and administrative enforcement mechanism between developed legal system and a developing country like Nigeria. Witness protection programmes in Nigeria, India, and the United States are good case studies for understanding the differences in the system, in a well-developed, a developing, and a less developed witness protection system.

This study comparatively analyzes the laws and practice relating to witness protection in Nigeria, India, and the USA. In doing so, this study seeks to answer the research question of the effectiveness of the witness protection system in Nigeria, India, and the USA, as well as the lessons that could be learnt and adapted from each of the jurisdictions. The core objective is to extract lessons and notable positive areas, highlight challenges, and propose reforms, especially for Nigeria, where the need for an effective witness protection system has never been more urgent. Thus, the research provides unique contributions to the discourse on witness protection, primarily by offering practical insights for legal reforms, policy design and implementation, and institutional improvement in three jurisdictions.

## Method

This paper uses the doctrinal method of research, alongside a comparative legal research approach. It is essential to effectively analyse the distinct legal and institutional frameworks for witness protection systems in the aforementioned countries. The doctrinal style of research is a research into doctrines and relies heavily on the interpretation and analysis of primary legal sources, including provisions of constitutions, acts, and statutes, legal text, judicial decisions and statements, policy documents, and other relevant international instruments.<sup>8</sup> Secondary sources are also used in this study. They include scholarly articles from some noteworthy journals, books, reports from governmental and non-governmental organisations, and expert commentaries, which were consulted in the process of this study to provide unique perspectives and a more nuanced understanding of the subject across all the regional contexts involved. The comparative approach facilitates the identification of differences, similarities, and best practices across these countries, while also uncovering the underlying social and legal factors that often dictate their legal systems.<sup>9</sup> It helps in

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<sup>7</sup> Priyanka. c, “WITNESS PROTECTION: A COMPARATIVE STUDY AMONG USA, UK, FRANCE, AND INDIA,” *LawFoyer International Journal of Doctrinal Legal Research* 2, no. 3 (2024): 299–315, <https://doi.org/10.70183/LIJDLR.2024.V02.18>; Ni Nyoman Juwita Arsawati et al., “Comparative Analysis of Witness Protection Law in Indonesia, Malaysia, and Australia,” *Journal of Indonesian Legal Studies* 9, no. 2 (2024): 503–36, <https://doi.org/10.15294/JILS.V9I2.1498>.

<sup>8</sup> Collins Ekpenisi et al., “Constitutional and Legislative Framework for Sustainable Environmental Management in Nigeria: Issues and Challenges,” *Journal of Indonesian Constitutional Law* 2, no. 2 (2025): 193–226, <https://doi.org/10.71239/JICL.V2I2.69>.

<sup>9</sup> Mark Van Hoecke, “Methodology of Comparative Legal Research,” *Recht En Methode in Onderzoek En Onderwijs*, ahead of print, January 19, 2016, <https://doi.org/10.5553/REM/.000010>.

providing a detailed analysis of the most prominent strengths, weaknesses, and potential areas for improvement in each system.

## **Witness Protection in Comparative Constitutional, Legal, and Procedural Perspectives: Nigeria, India, and the United States**

### **1. Conceptual Issues on Witness Protection in Nigeria, India, and the USA**

Among countries, the meaning of the key terms discussed in this study may vary somewhat, but for the most part, the basic notions remain essentially the same. Thus, the understanding of the concept of “witness” depends largely on the country in question. While the constitutions and statutes in Nigeria, India, and the United States of America do not offer a singular, explicit definition, it is outlined in at least one bill or statute “who is competent enough to be a witness”. Thus, definitions have often been drawn from these statutory items. Under Nigeria’s Evidence Act of 2011, Section 175 implies that for someone to be referred to as a “witness”, he or she must be capable of understanding and answering questions about a court case or legal proceeding rationally. Section 118 of the Indian Evidence Act of 1872 is almost identical in emphasising cognitive and communicative ability.<sup>10</sup> The U.S. Supreme Court in *Crawford v. Washington* [541 U.S. 36 (2004)] characterised a witness simply as “one who bears testimony”. Despite this lack of specificity in definitions observed in these three countries, there is a general legal understanding that a “witness” is anyone who has firsthand knowledge of certain facts or events that are important to a court case and is called upon to testify.<sup>11</sup> As provided by the United Nations Office on Drugs and Crime (UNODC), this means that the person must have certain information that is vital or crucial to the proceedings, including criminal proceedings.<sup>12</sup>

Different types of witnesses exist, and they can appear in different forms too, all depending on the nature of the court case and the legal and regional contexts. In most countries, “eye-witnesses” are those who testify to facts they personally observed or experienced,<sup>13</sup> “expert witnesses” who provide a specialised perspective and technical

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<sup>10</sup> Priyanacy Gupta, “An Empirical Study on Indian Cybercrime Laws for the Protection of Senior Citizens of Indore City,” *Kampala International University Law Journal (KIULJ)*, ISSN: 2519-9501 7, no. 2 (2025): 1–13, <https://doi.org/10.59568/KIULJ-2025-7-2-01>.

<sup>11</sup> Zahid Parwez et al., “Role of Judiciary in Protecting Witnesses in the Criminal Justice System: A Critical Analysis,” *International Journal of Membrane Science and Technology* 10, no. 2 (2023): 2089–93, <https://doi.org/10.15379/IJMST.V10I2.2776>.

<sup>12</sup> “UNODC Launches Witness Protection Manual,” accessed January 23, 2026, <https://www.unodc.org/unodc/en/press/releases/2008-02-13-2.html>.

<sup>13</sup> Gary L. Wells and Elizabeth A. Olson, “Eyewitness Testimony,” *Annual Review of Psychology* 54 (2003): 277–95, <https://doi.org/10.1146/ANNUREV.PSYCH.54.101601.145028>.

knowledge that helps the court in understanding complicated cases,<sup>14</sup> while “character witnesses” testify to the degree of credibility and moral standing of the person or people in question.<sup>15</sup> Some countries, like India, also recognise “hostile witnesses”, who testify but whose testimony is oppositional to the party that called them.<sup>16</sup> In the United States, witness classification also includes “material witnesses”, individuals whose testimony is so valuable that they may be detained to ensure their availability.<sup>17</sup>

Shankey and Krishnakumar<sup>18</sup> are of the view that the concept of “witness protection” has to do with the set of legal, procedural, and practical measures designed to protect witnesses and their close family members from harm, intimidation, or any form of revenge as a result of their involvement in a court case. Intimidation especially can be of various forms, ranging from verbal abuse, psychological pressure, overt threat of physical violence, etc. It can be direct or indirect. However, to O’Flaherty et al,<sup>19</sup> its fundamental aims remain; to unduly interfere with the ability or willingness of a witness to give evidence freely or to retaliate or react against someone who will or has given a testimony. The seriousness of this is that when most witnesses are intimidated, they often do not report to the authorities, and if they were initially cooperating with the authorities on a particular case, they quickly withdraw that corroboration and sometimes even go into hiding. Even when it is promptly reported to the relevant authorities, intimidation is most times, are difficult to prove.<sup>20</sup> This heightens the significance of protecting a witness.<sup>21</sup>

According to the United Nations Office on Drugs and Crime (UNODC), “witness protection entails physical security, relocation, identity change, and

<sup>14</sup> Matthew Gillett and Wallace Fan, “Expert Evidence and Digital Open Source Information: Bringing Online Evidence to the Courtroom,” *Journal of International Criminal Justice* 21, no. 4 (2024).

<sup>15</sup> Devita Kartika Putri, “THE RELEVANCE OF ‘CHARACTER WITNESS’ TESTIMONY IN CRIMINAL CASES IN INDONESIA,” *Diponegoro Law Review* 9, no. 1 (2024), <https://doi.org/10.14710/dilrev.9.1.2024.70-86>.

<sup>16</sup> Daniela Berti, “Hostile Witnesses, Judicial Interactions and out-of-Court Narratives in a North Indian District Court,” *Contributions to Indian Sociology* 44, no. 3 (2010): 235–63, <https://doi.org/10.1177/006996671004400302>.

<sup>17</sup> “Carolyn B. Ramsey, ‘In the Sweat Box: A Historical Perspective on the Detention of Material Witnesses.’ | Mendeley,” accessed January 23, 2026, [https://www.mendeley.com/search/?page=1&query=Carolyn B. Ramsey%2C %22In the Sweat Box%3A A Historical Perspective on the Detention of Material Witnesses.%22 &sortBy=relevance](https://www.mendeley.com/search/?page=1&query=Carolyn+B.+Ramsey%2C+%22In+the+Sweat+Box%3A+A+Historical+Perspective+on+the+Detention+of+Material+Witnesses.%22&sortBy=relevance).

<sup>18</sup> Shankey Verma and Akshaya Krishnakumar, “Towards a Witness Centric Approach: Analysis of Witness Protection Scheme, 2018,” *Crime, Law and Social Change* 75, no. 5 (2021): 433–44, <https://doi.org/10.1007/S10611-021-09942-5>.

<sup>19</sup> Brendan O’Flaherty and Rajiv Sethi, “Witness Intimidation,” *Journal of Legal Studies* 39, no. 2 (2010), <https://doi.org/10.1086/649032>.

<sup>20</sup> Amata Aso Othuke, “The Proof of Criminal Allegation in Election Petitions: A Critique of the Traditional Approach,” *Kampala International University Law Journal* 6, no. 2 (2024), <https://doi.org/10.59568/kiulj-2024-6-2-07>.

<sup>21</sup> Rama and Rahul Varshney, “A STUDY ON WITNESS PROTECTION LAWS IN INDIA AND THE USA: A COMPARATIVE PERSPECTIVE,” *ShodhKosh: Journal of Visual and Performing Arts* 5, no. 5 (2024), <https://doi.org/10.29121/SHODHKOSH.V5.I5.2024.5061>.

psychological support where necessary”.<sup>22</sup> Witness protection is not just about protecting witnesses during the trial but may also include an extension of the process to investigations before trial and reintegration after the trial ends, depending on the country. The concept has evolved from a small-minded view of just physical protection to a broader idea that also includes privacy rights, anonymity, support services, and several other essential services.<sup>23</sup> An effective witness protection system must be specifically designed to address the risk that a witness faces, ensuring some degree of proportionality and avoiding unnecessary interference with individual rights. It must be voluntary, confidential and non-discriminatory. Together, these principles form the basis upon which constitutional, legal and institutional frameworks for witness protection are built.

## 2. Legal Frameworks on Witness Protection in Nigeria, India, and the USA

An effective, efficient, and reliable witness protection program is an essential tool in any justice system. So, in the interest of a fair and effective justice system, the governments of various countries usually provide laws for the protection of witnesses against reprisal, violence, and intimidation, and to secure their safety and confidence to testify in a case. This is especially so in serious crimes like terrorism and other organized crimes, as the outright killing or intimidation of witnesses is a defining feature of most criminal organizations.<sup>24</sup> Thus, enacting laws that protect these witnesses is essential in keeping them alive and also sustaining their cooperation.

It is worth observing that Sections 33 and 35 of the Constitution of the Federal Republic of Nigeria, 1999 (as amended), provided for the rights to life and personal liberty, respectively. However, no provision of the constitution categorically mentioned witness protection, thereby ignoring to recognize it as a fundamental right, and leaving the subject to speculations and other legal frameworks. One of such principal legislation is the Administration of Criminal Justice Act (ACJA), 2015. The ACJA provision on the protection of witnesses is contained in section 232. This provision gives power to the Court to issue protection orders for vulnerable witnesses. It made provisions for the use of screens, pseudonyms, and closed court sessions where necessary. Another legislation is the Terrorism (Prevention) Act of 2011, which provides similar witness protections. Section 33 of the Act, provides for the non-

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<sup>22</sup> Ileana Citaristi, “United Nations Office on Drugs and Crime—UNODC,” *The Europa Directory of International Organizations 2022*, July 11, 2022, 248–52, <https://doi.org/10.4324/9781003292548-54>.

<sup>23</sup> Arsawati et al., “Comparative Analysis of Witness Protection Law in Indonesia, Malaysia, and Australia,” 2024.

<sup>24</sup> Salundik Salundik, “The Urgency of Witness and Victim Protection Institutions Against Organized Crime Eradication Through the Role of Whistleblowers,” *Pena Justisia: Media Komunikasi Dan Kajian Hukum* 22, no. 3 (2023), <https://doi.org/10.31941/pj.v22i3.2956>.

disclosure of witness identity in terrorism cases. Witness protection under this Act is however restricted specifically to terrorism cases.<sup>25</sup>

A significant step towards the establishment of a robust witness protection framework in Nigeria was made in 2022 by the enactment of the Witness Protection and Management Act. It was put in place to ensure that adequate consideration is given to witnesses regarding their safety and rights to protection. While the Act made provisions for measures such as relocation, identity change, and in-court protective measures for witnesses, within a witness protection program. The Witness Protection and Management Act has been criticized for not being holistic enough.<sup>26</sup> In scope, the Act provides in section 2 that it does not apply to all criminal cases, but only to crimes related to terrorism, money laundering, corruption, drug, narcotics, and trafficking. Also, financial constraints, risk assessment, and operational limitations are some of the factors that have rendered the Act ineffective for witness protection.<sup>27</sup> The lack of an effective witness protection program in Nigeria has threatened the safety of several witnesses and also made the public less trusting of the justice system. In high-profile cases such as those involving political juggernauts or highly notorious criminals, citizens have, over the years, become less inclined to testify in court.<sup>28</sup>

Just like in the case of Nigeria, the Indian Constitution does not explicitly provide for witness protection. However, within the last two decades, the witness protection laws in India underwent several changes which culminating in the establishment of its Witness Protection Scheme in 2018, This was made possible through the Supreme Court's decision in the landmark case of Mahender Chowla v. Union of India (2018) 15 SCC 633. In this case, the Supreme Court in its proactiveness, interpreted Article of the Constitution which provided for Right to life and personal liberty as the constitutional foundation for witness protection. The court recognized the "right to testify" as a fundamental right. This made witness protection a constitutional matter in India. The Witness Protection Scheme was made operational by virtue of section 141 of the Indian Constitution, providing a structured system for applying witness protection throughout all the states and territories in India. Under Part 5, Clause 5 of the Scheme, witnesses are categorized under the Scheme based on the degree of

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<sup>25</sup> Collins Ekpenisi et al., "Protecting Witnesses in Nigeria's Justice System: Legal Developments and Practical Realities," *Kampala International University Law Journal* 7, no. 2 (2025): 80–93, <https://doi.org/10.59568/KIULJ-2025-7-2-06>.

<sup>26</sup> Afam Afam, "PROTECTION AND REDRESSES FOR VICTIMS AND WITNESSES OF TORTURE BY THE NIGERIA POLICE FORCE," *UDUS Law Journal*, ahead of print, August 31, 2025, <https://doi.org/10.61955/QQWPTV>.

<sup>27</sup> Dayo Adu, "An Overview Of The Witness Protection And Management Act 2022 - Trials & Appeals & Compensation - Nigeria," June 2022, <https://www.mondaq.com/nigeria/trials-appeals-compensation/1201908/an-overview-of-the-witness-protection-and-management-act-2022>.

<sup>28</sup> Suzzie Onyeka Oyakhire, "Protection of Victim-Witnesses of Human Rights Violations in Criminal Prosecutions in Nigeria," *The Transnational Human Rights Review* 8, no. 1 (2021): 61–87, <https://doi.org/10.60082/2563-4631.1098>.

vulnerability to threats, and provide protective measures ranging from withholding witness identity during trials to relocation and change of identity.

In addition to the Scheme, India's Code of Criminal Procedure (CrPC) also outlines some protections for witnesses. Having in-camera proceedings in certain cases, like those involving sexual offences, is permitted under Section 327 (2) of the Code, while withholding witness identity in other sensitive cases is permitted by Section 173 (6) of the Code. The Indian Evidence Act 1872 and the Indian Penal Code 1860, two of the most vital statutes in the Indian legal system, do not offer any clear provision for witness protection. However, the Witness Protection Scheme was created to address this.

Although the USA possesses some of the most sophisticated and robust legal and institutional frameworks for witness protection in the world, the Constitution does not contain a specific provision for witness protection. Instead, witness protection is a statutory program established as the Federal Witness Security programme, commonly known as WITSEC.<sup>29</sup> This program was created by the Organised Crime Control Act of 1970 under Title V in sections 501 – 504, with activities formalized by relevant sections of the United States Constitution. The Attorney General is granted necessary powers under those sections to protect witnesses in cases involving serious offences, including organized crime, terrorism, or other crimes where the witnesses' testimonies may put their lives or those of their loved ones in jeopardy or danger (18 U.S.C. Ss 3521). Protective measures of WITSEC could encompass relocation, change of identity, and especially financial support.<sup>30</sup>

U.S. federal law also allows for several provisions for witness protection besides WITSEC. The Crimes Victim's Rights Act 2004 assures victims and witnesses of certain crimes of protection from the accused (Section 3771), while Rule 16(d)(1) of the Federal Rules of Criminal Procedure permits courts to withhold sensitive information of witnesses, particularly details about their identities or social life. Some US states also have their unique legal provisions for witness protection, each specifically designed to fit that state's needs and peculiarities.<sup>31</sup>

### 3. Witness Protection Practices in Nigeria, India, and the USA

It is one thing to make laws and another to implement those laws to achieve the purpose for which those laws were made in the first place. For instance, the

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<sup>29</sup> Wasiq B. Aqeel et al., "Prospects and Barriers of Witness Protection Laws in Pakistan," *Human Nature Journal of Social Sciences* 5, no. 2 (2024), <https://doi.org/10.71016/hnjss/gw9mrd25>.

<sup>30</sup> "Organized Crime and Insulated Violence: Federal Liability for Illegal Conduct in the Witness Protection Program," *Journal of Criminal Law and Criminology* 76, no. 1 (1985), <https://doi.org/10.2307/1143359>.

<sup>31</sup> "Yvon Dandurand, and Kristin Farr. A Review of Selected Witness Protection Programs. | Mendeley," accessed January 23, 2026, [https://www.mendeley.com/search/?page=1&query=Yvon Dandurand%2C and Kristin Farr. A review of selected witness protection programs. &sortBy=relevance](https://www.mendeley.com/search/?page=1&query=Yvon+Dandurand%2C+and+Kristin+Farr.+A+review+of+selected+witness+protection+programs.&sortBy=relevance).

implementation of witness protection in Nigeria has been largely ineffective.<sup>32</sup> Although the Administration of Criminal Justice Act (ACJA) permits courts to issue protective orders when necessary, there is no program primarily and nationally designed for handling witness protection, and no agency tasked with ensuring its effectiveness. Witness protection, when it is provided, is conducted based on the case, which is, in turn, dependent on the discretion of the judges or law enforcement officers involved. There often has to be solid proof or a strong reason to believe that the witness is threatened, especially if their testimony is vital to the case. This selective implementation of protective measures is what makes the system largely inconsistent.<sup>33</sup>

According to Oyakhire, there have been numerous reports from several human rights organisations and NGOs that show that intimidation and threats targeted at witnesses continue to be a serious problem in the country. This is especially true for cases involving affluent individuals, politicians, or people with ties to organised crime who are often powerful enough to forcefully dissuade witnesses from testifying. Corruption and inefficiency have made the system almost unsalvageable.<sup>34</sup> Cases that involve a lot of risk for witnesses, such as terrorism cases, most of which are prosecuted under the Terrorism (Prevention) Act 2011, have seen witnesses granted some levels of protection through anonymity. However, this is largely insufficient, as there is often no long-term plan or assurance of protection for witnesses, especially in instances where their identities could be easily discovered. As a result, many witnesses no longer wish to testify, with a few deciding to leave the country or go into hiding.

Even in cases where witness protection measures are adopted, they are often inadequate, especially when weighed against the level of threat or risk faced by witnesses. Nigeria's witness protection measures do not include services such as counseling, relocation, or financial assistance, all of which are essential to any effective witness protection program. Witness security is often provided by law enforcement agencies like the Nigerian Police or the Department of State Services (DSS); however, this is mostly conducted with limited funding and, as a result, is only temporary in nature. The lack of a well-structured witness protection agency in Nigeria can also be blamed for the lack of effective witness protection in the country as a whole. Since no organisation exists to incessantly push for advancement in witness protection, it is no surprise that current practices have remained the same, largely ineffective for years.

Nevertheless, there have been several cases where witness protection was considerably implemented. In *Federal Republic of Nigeria v. Alhaji Mujahid Dokubo-*

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<sup>32</sup> Saminu Abacha Wakili et al., "LEGAL FRAMEWORK AND CHALLENGES CONCERNING FORENSIC EVIDENCE IN NIGERIA," *Trunojoyo Law Review* 7, no. 1 (2025), <https://doi.org/10.21107/tlr.v7i1.28599>.

<sup>33</sup> Dr. Fatima Waziri- Azi, "Compliance to the Administration of Criminal Justice Act, 2015 in Prosecuting High Profile Corruption Cases in Nigeria (2015 ♦ 2017)," *Journal of Law and Criminal Justice* 5, no. 2 (2017), <https://doi.org/10.15640/JLCJ.V5N2A11>.

<sup>34</sup> Oyakhire, "Protection of Victim-Witnesses of Human Rights Violations in Criminal Prosecutions in Nigeria," 2021.

Asari (FHC/PH/CS/76/2007), the court acknowledged the potential threat to witnesses in high-profile cases involving national security. The court emphasised the need for protective measures to ensure witnesses could testify without fear, although specific protection protocols were not detailed. In *Federal Republic of Nigeria v. Kabiru Umar* (FHC/ABJ/CR/21/2012), where Kabiru Umar was tried for terrorism-related charges, the court permitted the use of masked witnesses and pseudonyms to protect the identities of witnesses, highlighting the judiciary's recognition of the need for witness protection in sensitive cases.

In India, the Witness Protection Scheme District Witness Protection Committees, which are often made up of a District Judge, Superintendent of Police, and District Legal Services Authority representatives, assess threat perceptions and recommend appropriate protection measures.<sup>35</sup> These could be simple protections, such as police escorts or more consequential interventions, like identity change, relocation, and financial aid. However, as a result of differences in financial and administrative capacity across different territories in a country as large as India, enforcement of witness protection still largely depends on districts and states. There is also the problem of slow court processes. The Indian Witness Protection Scheme relies heavily on each court's preferred directions for implementing protective measures, which are often subject to several delays. A witness may get threats immediately after agreeing to give their testimony in court, but the formal protection measures can only begin when the court has assessed the situation, deemed the threat substantial, and given the necessary orders.<sup>36</sup> Implementation of the Scheme is also negatively affected by insufficient funding, lack of cooperation between different states or districts, and a variety of practical setbacks, which make even standard protective measures like relocation and identity change largely ineffective.<sup>37</sup>

Nevertheless, the Scheme has improved the overall perception and approach towards witness protection in the country, especially when compared to other initiatives like those seen in countries like Nigeria. A practical example when witness protection was applied is in the case of *Zahira Habibulla H. Sheikh v. State of Gujarat* [(2004) 4 SCC 158].

The USA has the most advanced witness protection program of these three countries. WITSEC receives sufficient funding from the Federal government and employs the most experienced personnel, making the organisation fully capable of protecting all witnesses in the program. They conduct several protective measures such as identity change, relocation, counselling, financial aid, and even employment support

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<sup>35</sup> RISHI SINGH and ARVIND SINGH, "Comparative Insights into Witness Protection: Evaluating India's Framework Alongside Developed Nations," *International Journal For Multidisciplinary Research* 7, no. 2 (2025), <https://doi.org/10.36948/IJFMR.2025.V07I02.43396>.

<sup>36</sup> Vipin Vijay Nair, "The Status of Victim Protection in India: Comparative Analysis with International Regime," *International Journal of Public Law and Policy* 9, no. 2 (2023), <https://doi.org/10.1504/IJPLAP.2023.130007>.

<sup>37</sup> Nair, "The Status of Victim Protection in India: Comparative Analysis with International Regime."

when necessary. The US has the most advanced witness protection program of these three countries. WITSEC receives sufficient funding from the Federal government and employs the most experienced personnel, making the organisation fully capable of protecting all witnesses in the program. They conduct several protective measures, such as identity change, relocation, counselling, financial aid, and even employment support when necessary.<sup>38</sup>

In addition to all this, US state and Federal prosecutors have other guidelines for protective measures, such as the use of pseudonyms, conducting closed-court sessions, and placing several restrictions on who has access to witness information. In extremely high-risk cases, courts also work closely with various law enforcement agencies.<sup>39</sup> An example of witness protection in such high-risk cases is *United States v. Scarfo* (1988), a case that involved several witnesses testifying against multiple people with ties to organised crime. WITSEC demonstrated its effectiveness in this case, protecting numerous witnesses whose testimonies were vital in the conviction of some high-profile criminals.<sup>40</sup> Nonetheless, it is disheartening that the USA's witness protection program in the 80s, is comparatively more effective than the witness protection programs of several countries today.

#### **4. Issues and Challenges of Witness Protection in Nigeria, India, and the USA**

A reliable and effective legal framework and practice of witness protection is essential in the fight against crime in any society. The comparative reviews in witness protection undertaken in this study provides for an understanding and differences in the legal frameworks and practices in the countries under discussion. It reflects on persistent concerns about some of the deficiencies and limitations in the existing legal framework and practice of witness protection, as well as the ethical issues associated with some of their more controversial aspects.

Although none of the countries under review have specific provisions on witness protection in their Constitutions, the United States shows that having strong legal and institutional frameworks, as well as sufficient funding, is key to an effective witness protection program. India, in contrast, still seems to be in a transitional cocoon. A legal framework exists but is not fully operational; court assessment processes are slow, district differences hinder cooperation, and resources allocated remain meager. But at least, the country has made some strides in creating awareness of witness protection and

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<sup>38</sup> ANEELA FATIMA and MANYA PUNDIR, "SAFE BUT SEEN? EVALUATING THE PROMISE AND PERILS OF WITNESS PROTECTION IN INDIA AND THE USA," *JANUS NET E-Journal of International Relation* 16, no. 2 (2025), <https://doi.org/10.26619/1647-7251.16.2.24>.

<sup>39</sup> c, "WITNESS PROTECTION: A COMPARATIVE STUDY AMONG USA, UK, FRANCE, AND INDIA."

<sup>40</sup> Benjamin S. Rahardjo, "A Comparative Analysis of Whistleblower's Protection in Indonesia and United States of America," *Humaniora* 8, no. 2 (2017): 181, <https://doi.org/10.21512/HUMANIORA.V8I2.3895>.

developing an improved witness protection scheme. Compared to the US and India, Nigeria's witness protection program is almost non-existent. There is no coordinated legal or institutional framework for handling witness protection, corruption continues to eat deep into the court system, there is growing public distrust of law enforcement agencies, and a severe lack of funding and political will has made it difficult to have effective witness protection in the country. The political contexts of these three countries are also important. In the US, witness protection is treated as a matter of justice, national security, and human rights,<sup>41</sup> while in countries like India and Nigeria, it rarely receives the same level of consideration.

It is generally acknowledged that the witness is an essential part of every legal system because of the role they play in the course of justice. However, there have been instances, especially among developing countries like Nigeria and India, in which the protection programmes of this witness are besieged by so many challenges that affect their effectiveness. For instance, political interference is a big challenge to witness protection in both Nigeria and India. In Nigeria, it is almost normalised; potential witnesses often anticipate threats before they occur and are reluctant to testify in cases that involve powerful politicians. Witnesses also find it difficult to trust courts and law enforcement agencies. These institutions are often seen as tools of political leaders and are always more eager to take their sides rather than stand with the citizens.

In India, the main problem is lobbying. It is so rife that a notable scholar, Boruah, decries political interference by pointing out “there are several attempts to lobby people, to allure them with money, alleviation, post-retirement benefits or threats, even towards judges.”<sup>42</sup> The United States, while largely insulated from political interference due to WITSEC's institutional autonomy, has not been entirely immune, with several speculations asserting that some high-profile whistleblowers sometimes find themselves excluded from protection programs for reasons not entirely devoid of political calculation.

Resource allocation is a universal problem, but its severity differs dramatically across the three countries. In Nigeria, resource scarcity is acute. There are no dedicated safe houses, no structured relocation programs, and no financial provisions for witness support. India's situation is better, but some states are either unwilling or unable to allocate sufficient funds, leading to a system where the level of protection one receives

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<sup>41</sup> Hifajatali Sayyed and Ajit Kaushal, “Witness Protection in Contemporary Society,” *Journal of Positive School Psychology* 6, no. 5 (2022).

<sup>42</sup> Jayanta Boruah and Sarthak Aryan, “Indian Judiciary: Independence from Interferences vs Liberty to Interfere,” *SSRN Electronic Journal*, ahead of print, December 1, 2021, <https://doi.org/10.2139/SSRN.3916348>.

is a function of geographic luck.<sup>43</sup> The US, in comparison, illustrates how and why sufficient funding is essential to effective witness protection.<sup>44</sup>

Furthermore, several cultural factors also contribute to an ineffective witness protection program. In Nigeria, distrust for the legal system and law enforcement makes it difficult for witnesses to be fully cooperative during trials, as they also fear potential threats from corrupt officials in such systems.<sup>45</sup> There is a stigma attached to being a witness in several parts of India. This creates a culture of silence and fear that often discourages potential witnesses from testifying.<sup>46</sup> In contrast to India and Nigeria, the US has sustained a culture that valorises witnesses for decades. Witnesses whose testimonies aid in the conviction of notorious criminals are celebrated as people who were brave enough to step forward and protect their community. This narrative strengthens WITSEC's legitimacy in the public eye and further encourages participation.<sup>47</sup>

Finally, Nigeria and India both suffer from legal lapses that are too damning to ignore. In Nigeria, there have been few efforts to produce a more comprehensive version of the Witness Protection Act, which means that, nationally, there is no proper, legally binding procedure for executing witness protection, leaving it all to judicial discretion. India may have the Witness Protection Scheme, but the Scheme's status is often viewed as a court-mandated directive instead of a formal legislation, which leaves room for challenges and cases of non-compliance. The US stands out with a comprehensive and consistent legal framework for witness protection.

## Conclusion

The comparative analysis of witness protection in India, Nigeria, and the United States is insightful. It reveals several differences. The USA's witness protection program is undeniably one of the best in the world; well-coordinated, sufficiently funded, and notably effective at execution. India's Witness Protection Scheme is still improving; it

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<sup>43</sup> Abhishek Kumar Tiwari et al., "WITNESS PROTECTION IN INDIA: LAWS AND PRACTICE," *ShodhKosh: Journal of Visual and Performing Arts* 5, no. 6 (2024), <https://doi.org/10.29121/SHODHKOSH.V5.I6.2024.2991>.

<sup>44</sup> ANEELA FATIMA and MANYA PUNDHIR, "SAFE BUT SEEN? EVALUATING THE PROMISE AND PERILS OF WITNESS PROTECTION IN INDIA AND THE USA," *JANUS NET E-Journal of International Relation* 16, no. 2 (2025), <https://doi.org/10.26619/1647-7251.16.2.24>.

<sup>45</sup> Azi, "Compliance to the Administration of Criminal Justice Act, 2015 in Prosecuting High Profile Corruption Cases in Nigeria (2015 ♦ 2017)."

<sup>46</sup> Mustafa Demir, "The Perceived Effect of a Witness Security Program on Willingness to Testify," *International Criminal Justice Review* 28, no. 1 (2018): 62–81, <https://doi.org/10.1177/1057567717721298>.

<sup>47</sup> Saša Atanasov et al., "WITNESS PROTECTION PROGRAMS FOR JUSTICE COLLABORATORS-COMPARATIVE OVERVIEW (POSITIVE LEGAL SOLUTIONS IN THE REPUBLIC OF SERBIA, THE REPUBLIC OF NORTH MACEDONIA, USA, ENGLAND AND ITALY)," *Proceedings of the International Scientific Conference "Social Changes in the Global World"* 1 No.6 (2019).

is currently being hindered by a lack of funding, legal uncertainties, and a host of political problems. Nigeria has the least developed witness protection framework, one that is still being developed amidst issues of corruption, abuse of political power, and a broad distrust of governmental institutions. The shortfalls of Nigeria's witness protection system are symptoms of deep-rooted issues, but can be reasonably addressed by inserting witness protection as a constitutional right, improving or expanding the scope of the already-existing witness protection laws, establishment of an independent, de-politicised witness protection agency akin to the U.S.'s WITSEC, the allocation of secured budgets for protection programs, establishment of a standardised risk assessment model executed by trained security professionals, public education campaigns to demystify witness protection and counteract the cultural stigma attached to testifying and collaboration with countries with established witness protection systems, such as the United States. Nigeria must move beyond aspiration to action, learning from the U.S. model and others alike and adapting it to the country's unique social and political concerns. Until this happens, the safety of witnesses will be nothing but a questionable promise, one that compromises the very integrity of the justice system itself.

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