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FRAUD RISK MANAGEMENT AND FINANCIAL INTEGRITY IN NIGERIA: TOWARDS AN INTEGRATED INTERNAL CONTROL AND GOVERNANCE FRAMEWORK FOR SUSTAINABLE DEVELOPMENT

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ABSTRACT

Fraud remains one of the most corrosive threats to financial integrity and sustainable development in Nigeria. Global evidence from the Association of Certified Fraud Examiners' most recent biennial study, published in May 2026 and covering 2,402 cases of occupational fraud across 143 countries, indicates that the typical organisation loses an estimated five per cent of annual revenue to occupational fraud, with a median loss of 104,000 United States dollars per case (ACFE, 2026), while Nigerian deposit money banks lost ₦42.6 billion to fraud and forgeries in the second quarter of 2024 alone, a figure that exceeded total reported losses for the whole of 2023 on the same reporting series. Against this backdrop, this conceptual paper develops an integrated framework linking fraud risk management, internal control, and corporate governance to financial integrity and sustainable development outcomes. Drawing on the fraud triangle, the fraud diamond, agency theory, and institutional theory, and synthesising the COSO Internal Control Integrated Framework, the COSO and ACFE Fraud Risk Management Guide, and the Three Lines Model, the paper proposes a five pillar Integrated Fraud Risk Management and Financial Integrity (IFRMFI) Framework comprising governance and ethical tone, fraud risk assessment, preventive and detective control activities, whistleblowing and continuous monitoring, and investigation, enforcement, and remediation. Seven testable propositions, numbered one to six with Proposition 3 stated in two parts as 3a and 3b, are advanced to guide future empirical inquiry. The paper argues that financial integrity is produced not by isolated anti fraud interventions but by the disciplined interaction of governance, control, and accountability structures operating within a supportive institutional environment. Implications are drawn for boards, regulators, forensic accounting practice, and accounting education, with direct relevance to Sustainable Development Goal 16 on peace, justice, and strong institutions.

Keywords: *fraud risk management; financial integrity; internal control; corporate governance; sustainable development*

1. INTRODUCTION

1.1 Background to the Study

Financial integrity is the foundation upon which credible markets, trusted institutions, and sustainable economic development are built. Where financial information is reliable, resources are allocated efficiently, investors commit capital with confidence, tax systems function equitably, and public trust in both private enterprise and government is sustained. Where financial integrity is compromised by fraud, corruption, and manipulation, the consequences extend far beyond the immediate victims: capital flees, borrowing costs rise, public services are starved of revenue, and development objectives are undermined. It is for this reason that the 2030 Agenda for Sustainable Development explicitly targets the substantial reduction of corruption and bribery and the development of effective, accountable, and transparent institutions under Sustainable Development Goal 16 (United Nations, 2015).

The scale of the fraud problem is substantial and well documented. The Association of Certified Fraud Examiners (ACFE), in its most recent biennial global study, the fourteenth edition of the Report to the Nations published in May 2026 and covering 2,402 real cases of occupational fraud investigated across 143 countries and territories with aggregate losses exceeding 3.4 billion United States dollars, estimates that the typical organisation loses about five per cent of its annual revenue to fraud, with a

median loss of 104,000 dollars per case (ACFE, 2026). The study further shows that asset misappropriation is by far the most common category, occurring in about 90 per cent of cases, that some 45 per cent of cases involve corruption, and that financial statement fraud, although present in only about six per cent of cases, remains the costliest category with a median loss of about one million dollars per case (ACFE, 2026). Significantly for the design of anti fraud architecture, tips remained the single most important detection channel, accounting for 43 per cent of detected frauds, with 55 per cent of tips coming from employees and with internal audit and management review trailing at 15 and 13 per cent respectively, while organisations operating formal reporting mechanisms suffered median losses of 100,000 dollars against 150,000 dollars for those without them and detected frauds in eleven months against seventeen (ACFE, 2026). Equally instructive, 84 per cent of perpetrators displayed at least one behavioural red flag before or during their schemes, confirming that fraud is rarely invisible to attentive organisations (ACFE, 2026).

The Nigerian context gives these global figures a sharp local edge. Nigeria scored 26 out of 100 points on the 2025 Corruption Perceptions Index, ranking 142nd among the 182 countries and territories assessed, a position that reflects stagnation in the fight against corruption despite notable enforcement activity (Transparency International, 2026; Premium Times, 2026). Within the financial system, the Financial Institutions Training Centre reported that Nigerian deposit money banks lost ₦42.6 billion to fraud and forgeries in the second quarter of 2024 alone1, an amount that exceeded the ₦9.4 billion lost across the entire 2023 financial year on the same reporting series, with losses channelled through bank branches, digital platforms, and payment instruments (FITC, 2024). Two features of that figure warrant emphasis: it is dominated by a small number of exceptional incidents, including the insertion of fictitious amounts into settlement files, so that quarterly loss levels are volatile; and it derives from the FITC reporting series, whose figures differ from those produced by the Nigeria Inter-Bank Settlement System owing to methodological differences (FITC, 2024). At the same time, there is evidence of institutional response: between October 2023 and September 2025 the Economic and Financial Crimes Commission recovered ₦566 billion, 411 million United States dollars, and 1,502 properties (The Guardian, 2025), and in October 2025 Nigeria secured removal from the Financial Action Task Force grey list following implementation of its action plan on anti money laundering and counter terrorism financing (FATF, 2025). The coexistence of very large fraud losses and very large recoveries points to a system in which enforcement is active but prevention is weak, and it is precisely this imbalance that motivates the present paper.

Forensic accounting and fraud risk management sit at the centre of the response to this challenge. Forensic accounting supplies the investigative, evidential, and litigation support skills required to detect and prosecute fraud after the fact, while fraud risk management, as codified in the joint guidance of the Committee of Sponsoring Organizations of the Treadway Commission and the ACFE, supplies the forward looking governance, assessment, control, and monitoring disciplines required to prevent and deter fraud before it crystallises (COSO & ACFE, 2023). Nigerian empirical research has repeatedly affirmed the value of the forensic accounting side of this equation (Enofe, Okpako, & Atube, 2013; Gbegi & Adebisi, 2014; Modugu & Anyaduba, 2013; Okoye & Gbegi, 2013). What has received far less scholarly attention in the Nigerian literature is the integration of fraud risk management with internal control frameworks and corporate governance structures into a single coherent architecture directed at financial integrity, and it is this gap that the paper addresses.

1.2 Statement of the Problem

Anti fraud practice in many Nigerian organisations is fragmented. Internal control frameworks are frequently documented for compliance purposes but not embedded in daily operations, so that control descriptions exist on paper while control operation fails in practice. Fraud risk assessment, where it is performed at all, is often conducted as a standalone exercise disconnected from the enterprise risk register, the internal audit plan, and board reporting. Forensic accounting capability is deployed reactively, after losses have crystallised, rather than being integrated into the design of preventive and detective controls. Corporate governance codes are complied with in form through the constitution of

1FITC's third quarter 2024 report retrospectively restated second quarter losses as ₦42.8 billion; the second quarter report itself and contemporaneous coverage report ₦42.6 billion, the figure used here.

committees and the filing of returns, while the substantive behaviours the codes are intended to produce, such as rigorous oversight of the control environment and genuine protection of whistleblowers, remain underdeveloped. The result is a control system that is expensive to maintain, weak in prevention, and heavily dependent on after the event investigation and enforcement.

The academic literature mirrors this fragmentation. Nigerian studies have concentrated on testing the bivariate relationship between forensic accounting and fraud detection or prevention, generally confirming a positive and significant association (Modugu & Anyaduba, 2013; Okoye & Gbegi, 2013). International scholarship has developed rich theoretical accounts of why individuals commit fraud (Cressey, 1953; Wolfe & Hermanson, 2004) and of how fraud risk management has become an organisational apparatus in its own right (Power, 2013), and has synthesised large bodies of fraud research (Trompeter, Carpenter, Desai, Jones, & Riley, 2013). However, there is a shortage of integrative frameworks, developed for and grounded in the Nigerian institutional environment, that specify how governance, internal control, fraud risk management, and forensic accounting should interact to produce financial integrity, and that generate testable propositions to guide empirical work. This paper responds to that shortage.

1.3 Objectives of the Paper

The broad objective of this paper is to develop an integrated conceptual framework linking fraud risk management, internal control, and corporate governance to financial integrity and sustainable development in Nigeria. The specific objectives are: first, to review the conceptual, theoretical, and empirical literature on fraud, fraud risk management, internal control, and financial integrity; second, to synthesise the COSO Internal Control Integrated Framework, the COSO and ACFE Fraud Risk Management Guide, and the Three Lines Model into a unified architecture adapted to the Nigerian institutional context; third, to advance testable propositions connecting the elements of that architecture to financial integrity outcomes; and fourth, to draw implications for boards, regulators, practitioners, and researchers.

1.4 Significance and Scope

The paper is significant on three fronts. For practice, it offers boards, audit committees, and heads of risk and control functions a coherent blueprint that converts fragmented anti fraud activities into an integrated system with clear ownership under the Three Lines Model. For policy, it speaks directly to the mandate of the Financial Reporting Council of Nigeria, the Central Bank of Nigeria, the Securities and Exchange Commission, and the anti corruption agencies, by showing how regulatory instruments can be aligned to reward substantive control effectiveness rather than formal compliance. For scholarship, it supplies a proposition based framework that Nigerian researchers can operationalise and test, thereby moving the local literature beyond bivariate forensic accounting studies towards richer, multi construct models. The scope of the paper is conceptual: it covers private and public sector organisations in Nigeria, with illustrative reference to the banking and downstream petroleum sectors where fraud exposure is pronounced, and it addresses occupational fraud in the sense defined by the ACFE, namely the use of one's occupation for personal enrichment through the deliberate misuse or misapplication of the employing organisation's resources or assets (ACFE, 2026).

1.5 Structure of the Paper

The remainder of the paper proceeds as follows. Section two reviews the conceptual, theoretical, and empirical literature. Section three explains the methodology. Section four develops the proposed Integrated Fraud Risk Management and Financial Integrity Framework and advances the propositions. Section five discusses implications for practice and policy, and section six concludes with limitations and a future research agenda.

2. LITERATURE REVIEW

2.1 Conceptual Review

Financial integrity. Financial integrity refers to the state in which an organisation's financial information is complete, accurate, and faithfully representative of underlying economic reality, in which

its resources are safeguarded against misappropriation, and in which its financial conduct complies with applicable laws, regulations, and ethical norms. It is both an organisational attribute, reflected in reliable reporting and protected assets, and a systemic attribute, reflected in the credibility of markets and public institutions. Financial integrity is therefore broader than the absence of fraud: it encompasses the quality of financial reporting, the effectiveness of stewardship over assets, tax compliance, and the transparency of financial flows. The term should be distinguished from its usage in international financial policy, where financial integrity denotes the protection of the financial system from money laundering, terrorist financing, and illicit financial flows (FATF, 2012); the two usages are related, since organisational level failures aggregate into system level vulnerabilities, but the construct in this paper is located at the organisational and institutional level. Formally, this paper defines financial integrity as a latent organisational state that is not directly observable but is indicated by four families of observable outcomes: (a) fraud incidence and loss magnitude; (b) detection latency, the time between the initiation of a fraud and its discovery; (c) the reliability of financial reporting, reflected in audit adjustments, restatements, and related indicators; and (d) sanction and recovery outcomes, reflected in the consistency of consequences and the proportion of losses recovered. This definition unifies the outcome variables of the propositions advanced in section four and is summarised, together with the paper's other core constructs, in Table 1. In the Nigerian setting, financial integrity is a statutory as well as an ethical concern, anchored in the Companies and Allied Matters Act 2020, which imposes duties of proper accounting and disclosure on companies and their directors (Federal Republic of Nigeria, 2020), and in the anti money laundering regime consolidated under the Money Laundering (Prevention and Prohibition) Act 2022 (Federal Republic of Nigeria, 2022).

Fraud and occupational fraud. Fraud is an intentional act involving deception to obtain an unjust or illegal advantage. Occupational fraud, the focus of this paper, arises when persons use their positions within organisations to enrich themselves at the organisation's expense. The ACFE taxonomy distinguishes three primary categories: asset misappropriation, which includes theft of cash, fraudulent disbursements, and misuse of inventory and other assets; corruption, which includes bribery, kickbacks, conflicts of interest, and economic extortion; and financial statement fraud, which involves the intentional misstatement or omission of material information in financial reports (ACFE, 2026). The three categories differ sharply in frequency and severity: in the 2026 global study, asset misappropriation dominated by frequency, occurring in approximately 90 per cent of cases, corruption appeared in about 45 per cent, and financial statement fraud, present in only about six per cent of cases, produced the highest median loss at about one million dollars per case, a pattern with direct implications for how organisations should allocate preventive and detective resources (ACFE, 2026). External audit responsibilities in relation to fraud are framed by International Standard on Auditing 240, which requires the auditor to identify and assess the risks of material misstatement due to fraud and to design responses to those risks, while making clear that primary responsibility for the prevention and detection of fraud rests with those charged with governance and with management (IAASB, 2009). A revised standard, ISA 240 (Revised), issued in 2025 and effective for periods beginning on or after 15 December 2026, with early adoption permitted, strengthens these requirements, including a more explicit expectation that the auditor understand the entity's fraud risk assessment and whistleblowing arrangements, together with sharpened required responses to the risk of management override (IAASB, 2025). Nigerian adoption of the revised standard will follow the local standard-setting process, so the extant ISA 240 remains operative in Nigeria until that process concludes.

Fraud risk management. Fraud risk management is the structured, continuous process by which an organisation governs, assesses, mitigates, detects, investigates, and monitors its exposure to fraud. The authoritative articulation is the Fraud Risk Management Guide issued jointly by COSO and the ACFE, whose second edition organises the discipline around five principles that deliberately parallel the components of the COSO internal control framework: establishing a fraud risk governance policy as part of organisational governance; performing comprehensive fraud risk assessments; selecting, developing, and deploying preventive and detective fraud control activities; establishing fraud reporting mechanisms and coordinated investigation and corrective action processes; and monitoring the fraud risk management programme with ongoing evaluations and reporting of deficiencies (COSO & ACFE, 2023). The guide emphasises that fraud risk management is not a compliance appendix but a governance discipline that must be owned at board level, resourced by management, and informed by data analytics and behavioural insight (COSO & ACFE, 2023).

Internal control and internal control over financial reporting. Internal control is a process, effected by an entity's board of directors, management, and other personnel, designed to provide reasonable assurance regarding the achievement of objectives relating to operations, reporting, and compliance. The COSO framework structures internal control into five integrated components, namely the control environment, risk assessment, control activities, information and communication, and monitoring activities, supported by seventeen principles, and stipulates that an effective system requires all five components to be present, functioning, and operating together (COSO, 2013). Principle eight of the framework requires the organisation to consider the potential for fraud explicitly in assessing risks to the achievement of objectives, which is the formal hinge connecting internal control to fraud risk management (COSO, 2013). Internal control over financial reporting is the subset of internal control directed specifically at the reliability of financial statements, and its effectiveness is the proximate determinant of reporting integrity. The Nigerian accounting tradition has long emphasised accountability and probity as core purposes of accounting systems in both private and public sectors (Dandago, 2009), and the internal control discipline gives that tradition its operational machinery.

Corporate governance. Corporate governance is the system of rules, structures, and processes by which organisations are directed and controlled, allocating rights and responsibilities among boards, management, shareholders, and other stakeholders. In Nigeria, the principal instrument is the Nigerian Code of Corporate Governance 2018 issued by the Financial Reporting Council, which adopts an apply and explain philosophy and sets out principles on board composition and responsibilities, assurance, including internal audit and whistleblowing frameworks, relationships with stakeholders, and transparency (FRC, 2018). The Code assigns the board responsibility for ensuring that a sound risk management and internal control system is in place and requires the establishment of effective whistleblowing mechanisms, thereby making fraud risk governance an explicit board obligation rather than a delegated technical matter (FRC, 2018). The Companies and Allied Matters Act 2020 reinforces these obligations with statutory duties for directors and, for significant public companies, requirements bearing on audit committees and financial disclosures (Federal Republic of Nigeria, 2020). Sectoral regulation has recently deepened this architecture. The Central Bank of Nigeria's Corporate Governance Guidelines, issued in July 2023 and effective from 1 August 2023 for commercial, merchant, non-interest, and payment service banks and for financial holding companies, impose tenure caps, mandate independent non-executive directors, require ICT and cybersecurity expertise at board level, and prescribe sanctions for insider lending abuses (Central Bank of Nigeria, 2023). At the capital market level, the Investments and Securities Act 2025, assented to in March 2025, repeals the Investments and Securities Act 2007, expands the enforcement powers of the Securities and Exchange Commission, criminalises Ponzi schemes, and brings digital assets within the regulatory perimeter (Federal Republic of Nigeria, 2025). The Nigeria Data Protection Act 2023 is also relevant to fraud risk management, since it governs the lawful processing of the personal data on which fraud analytics and whistleblowing case management depend (Federal Republic of Nigeria, 2023).

Sustainable development. Sustainable development is development that meets present needs without compromising the ability of future generations to meet theirs. The 2030 Agenda operationalises the concept through seventeen goals, of which Goal 16 commits states to promote peaceful and inclusive societies, provide access to justice, and build effective, accountable, and inclusive institutions, with explicit targets on substantially reducing corruption and bribery in all their forms and on significantly reducing illicit financial flows (United Nations, 2015). Financial integrity is thus not merely a private governance concern but a development input: every naira lost to occupational fraud is a naira unavailable for investment, wages, taxation, and public services, and every high profile fraud erodes the institutional trust on which development finance depends.

Table 1: *Core constructs of the paper and candidate empirical indicators*

Construct	Definition	Candidate empirical indicator
Financial integrity	**Latent organisational state of reliable reporting, safeguarded assets, and lawful and ethical financial conduct**	**Fraud loss incidence and magnitude; detection latency; restatements and audit adjustments; sanction and recovery rates**
Fraud risk management	**Structured, continuous process of governing, assessing, mitigating, detecting, investigating, and monitoring fraud exposure**	**Evidence of operation of the five COSO and ACFE fraud risk management principles**
Internal control	**Process effected by the board, management, and other personnel to provide reasonable assurance over operations, reporting, and compliance objectives**	**Control deficiency counts and severity; remediation closure rates**
Corporate governance	**System of rules, structures, and processes by which organisations are directed and controlled**	**Board independence and expertise; committee activity; quality of apply and explain disclosures**
Whistleblowing trustworthiness	**Degree to which reporting channels are used, protected, and acted upon without retaliation**	**Tip volumes and substantiation rates; retaliation incidents; case cycle time**
Institutional environment	**External configuration of regulation, enforcement, and professional norms within which the organisation operates**	**Regulatory enforcement capacity; judicial efficiency; corruption perception scores**

Source: Author's construction (2026).

2.2 Theoretical Framework

Fraud triangle, fraud scale, and fraud diamond. The dominant behavioural account of fraud originates in Cressey's study of convicted embezzlers, which found that trust violations occur when three conditions coincide: a non shareable financial pressure, a perceived opportunity created by weak controls or unsupervised trust, and a rationalisation that allows the offender to reconcile the act with a self image of honesty (Cressey, 1953). Albrecht, Howe, and Romney (1984) refined this account into the fraud scale, arguing that the likelihood of fraud varies with the interaction of situational pressure, perceived opportunity, and personal integrity, thereby drawing attention to individual ethical character as a variable that organisations can screen for and cultivate. Wolfe and Hermanson (2004) extended the triangle into a fraud diamond by adding capability, the recognition that many frauds, particularly large and complex ones, require an offender with the position, intelligence, confidence, and coercive skill to convert opportunity into action. The practical import of these theories is that anti fraud architecture must operate on all elements simultaneously: controls compress opportunity, ethical culture and sanctions undermine rationalisation, employee support programmes and reasonable performance targets moderate pressure, and segregation of duties and oversight neutralise capability.

Sociological and economic perspectives. Sutherland's theory of differential association situates white collar crime in learned behaviour transmitted within organisational and professional groups, implying that tolerated small violations teach larger ones and that culture is itself a control (Sutherland, 1949). Becker's economic model of crime treats offending as a rational calculation in which expected benefits are weighed against the probability of detection and the severity of sanctions, implying that credible detection mechanisms and consistently applied consequences are deterrents in their own right

(Becker, 1968). The deterrence deficit predicted by that model is visible in the disposition of occupational fraud cases: while termination is the most common internal sanction and only a small minority of perpetrators, about four to five per cent, receive no punishment at all, just over half of victim organisations refer cases to law enforcement, and sanctions tend to soften as the offender's seniority rises, so that a substantial share of occupational fraud ultimately escapes both criminal process and proportionate consequence (ACFE, 2024). The case disposition and sanction statistics reported here are drawn from the 2024 edition of the Report to the Nations because the 2026 edition does not publish the disposition breakdown in comparable form; all headline loss, detection, scheme, and red flag statistics used elsewhere in this paper are taken from the current 2026 edition (ACFE, 2026).

Agency theory. Agency theory frames the firm as a nexus of contracts in which principals delegate decision authority to agents whose interests diverge from their own, generating agency costs that monitoring and bonding mechanisms are designed to contain (Jensen & Meckling, 1976). The separation of decision management from decision control, through boards, audit committees, and independent assurance, is the classic governance response to this problem (Fama & Jensen, 1983). Occupational fraud is an extreme manifestation of agency conflict, and internal control, internal audit, external audit, and fraud risk management are, in agency terms, monitoring technologies whose cost is justified by the losses they prevent. Agency theory therefore supplies the economic logic for the governance pillar of the framework developed in section four.

Institutional theory. Institutional theory explains why organisations in the same field come to resemble one another, identifying coercive pressure from regulation, mimetic pressure from imitation under uncertainty, and normative pressure from professionalisation as the mechanisms of isomorphism (DiMaggio & Powell, 1983). The theory illuminates a central Nigerian risk: organisations may adopt the visible forms of fraud risk management, such as policies, committees, and hotlines, in order to secure legitimacy with regulators and counterparties, while decoupling those forms from actual practice. Power's analysis of the fraud risk management apparatus makes a complementary point at the international level, showing how fraud risk has been progressively institutionalised into standards, guides, and professional jurisdictions, with the attendant danger that the apparatus becomes an end in itself rather than a means to integrity (Power, 2013). Free (2015) likewise cautions that mechanical application of the fraud triangle can degenerate into checklist compliance and calls for renewed attention to organisational context, collusion, and culture. Vousinas (2019) pursues this critique formally in the S.C.C.O.R.E. model, which adds collusion and arrogance to the fraud equation and situates offending within the interaction of motivation, opportunity, and regulatory efficacy. Roffia and Poffo (2025), analysing the Enron, Wirecard, Parmalat, and Theranos cases, trace the theory's progression from triangle to diamond, pentagon, and hexagon and argue for a polygon of elements that includes the thrill of risk taking, concluding that no fixed geometry of factors exhausts the aetiology of corporate fraud. These cautions are built into the framework in section four through its insistence on evidence of operating effectiveness rather than documentary existence.

2.3 Empirical Review

Global evidence. The ACFE global study provides the most comprehensive empirical picture of occupational fraud, and three findings beyond the headline statistics cited in section one are especially relevant to framework design. First, tips dominate all other detection methods, accounting for 43 per cent of detected frauds, with 55 per cent of tips originating from employees and with internal audit (15 per cent) and management review (13 per cent) trailing well behind (ACFE, 2026). Second, formal reporting mechanisms are associated with materially better outcomes: organisations operating them record median losses of 100,000 dollars against 150,000 dollars for organisations without them, and detect frauds in eleven months against seventeen (ACFE, 2026). Third, 84 per cent of perpetrators displayed at least one behavioural red flag, confirming that fraud is seldom invisible to attentive monitoring (ACFE, 2026). Synthesising the wider scholarly literature, Trompeter, Carpenter, Desai, Jones, and Riley (2013) organise fraud research around the elements of the fraud triangle and the actions of those who perpetrate, detect, and respond to fraud, and identify the interaction between individual incentives and organisational monitoring as the core of the field. A fast growing data analytics stream extends this picture. Sun, Ling, Li, and Xie (2025) show that firm level artificial intelligence adoption reduces both the likelihood and the severity of financial fraud, operating through improved information

transparency and stronger internal control; Motie and Raahemi (2024) synthesise the graph neural network literature on financial fraud detection; and Odufisan, Abhulimen, and Ogunti (2025) examine the harnessing of artificial intelligence and machine learning for fraud detection and prevention in Nigeria specifically, finding substantial potential constrained by data quality, skills, and infrastructure gaps.

Nigerian evidence. Nigerian empirical work has concentrated on forensic accounting. Modugu and Anyaduba (2013), surveying 143 accountants, management staff, practising auditors, and stakeholders and analysing responses with a binomial test, found significant agreement that forensic accounting is effective for financial fraud control, financial reporting quality, and internal control quality. Okoye and Gbegi (2013) studied selected ministries in Kogi State and reported that forensic accounting significantly aids fraud detection and prevention in the public sector. Gbegi and Adebisi (2014) found that forensic accounting skills and techniques significantly improve fraud investigation outcomes in the Nigerian public sector, and Enofe, Okpako, and Atube (2013) reported that the application of forensic accounting services affects the level of fraudulent activities in firms. More recent studies have extended this base beyond the early survey designs. Adesina, Erin, Ajetunmobi, Ilogho, and Asiriuwa (2020) found that forensic audit significantly influences fraud control in Nigerian deposit money banks; Owolabi and Ogunsola (2021) reported comparable detection effects in the same sector; Akinwale, Ailemen, and Areghan (2022) documented the rising salience of electronic fraud as a threat to the viability of Nigerian banks; and, closest to the preventive concerns of this paper, Ogwiji and Lasisi (2022), applying structural equation modelling to quoted financial services firms, reported significant effects of internal control components on fraud prevention. The most recent wave of studies deepens and diversifies this evidence base. Ogah (2025) provides empirical evidence on forensic accounting and fraud management by listed banks, and Joseph, Abdulsalam, Aboyeji, and Adesina (2024), in a case study of a tier one deposit money bank, find that forensic accounting significantly enhances fraud detection and prevention. Benedict, Markus, and Doka (2025) report that fraud significantly lowers the financial reporting quality of listed conglomerate companies, direct panel evidence for the financial integrity construct advanced in this paper, while Enya, Chukwuma, and Ojo (2024) link board attributes to financial statement fraud in listed consumer goods firms, connecting governance characteristics to fraud outcomes. In the public sector, Almustapha, Sabo, and Ahmed (2025) find that whistleblowing significantly supports fraud prevention, evidence directly relevant to pillar four of the framework developed below. Taken together, the Nigerian studies consistently support the detection and investigation value of forensic accounting and, increasingly, the preventive value of internal control, but they largely examine single constructs in isolation, leave the integrated architecture of governance, control, and fraud risk management under theorised, and rarely connect fraud outcomes to broader financial integrity or development consequences. Sectoral loss data reinforce the point that detection oriented approaches alone are not containing the problem, given the escalation of banking fraud losses documented by FITC (2024).

2.4 Gap in the Literature

Three gaps emerge from the review. First, an integration gap: the review identified limited Nigerian scholarship integrating fraud risk management, internal control, and corporate governance within a unified financial integrity framework, despite the deliberate architectural alignment of the COSO Internal Control Framework and the COSO and ACFE Fraud Risk Management principles. Second, a theorisation gap: local studies are predominantly atheoretical or rely on a single lens, whereas the phenomenon demands the combined behavioural, economic, and institutional perspectives assembled above. Third, a development linkage gap: the connection between organisational financial integrity and national sustainable development outcomes, explicit in Goal 16, is asserted more often than it is specified. The framework in section four addresses all three gaps. In doing so, the paper's contribution is deliberately one of synthesis, contextualisation, and proposition development rather than of new theory: it assembles the authoritative professional architecture into a single model, grounds each element in combined theory and Nigerian evidence, and renders the whole empirically testable.

3. METHODOLOGY

This is a conceptual paper employing an integrative literature review and framework development approach, a design suited to topics whose constructs and evidence are dispersed across professional and academic literatures and whose objective is synthesis and theory elaboration rather than hypothesis testing (Torraco, 2005). The review followed the guidance of Snyder (2019) on the literature review as a research methodology, and the framework development followed Jaakkola's (2020) templates for conceptual articles, approximating her model paper approach, in which relationships among constructs are specified and rendered testable.

The review was organised around a single explicit question: how can global fraud risk governance frameworks, fraud theory, and Nigerian empirical and regulatory evidence be synthesised into a contextually grounded framework of financial integrity?

The search protocol is summarised in Table 2. Scholarly sources were located through Scopus, Web of Science, Google Scholar, African Journals Online, and SSRN, using combinations of the terms fraud, occupational fraud, fraud risk management, forensic accounting, internal control, corporate governance, whistleblowing, and financial integrity, paired with Nigeria for the empirical stream. The empirical stream was restricted to the period 2013 to 2026 to privilege current evidence, while foundational theoretical works were retained regardless of age. Professional and regulatory sources, including the COSO frameworks, the Three Lines Model, the International Standards on Auditing, the ACFE reports, and Nigerian statutes, codes, and regulatory guidelines, were obtained directly from the issuing bodies. Inclusion required that a source be peer reviewed or an authoritative regulatory or professional publication, Nigeria relevant for the empirical stream, and available in English; non-scholarly blogs and unverifiable grey sources were excluded.

Table 2: *Search protocol for the integrative review*

Element	Specification
Scholarly databases	**Scopus; Web of Science; Google Scholar; African Journals Online; SSRN**
Institutional sources	**COSO; ACFE; IIA; IAASB; CBN; FRC; SEC; FITC; EFCC; FATF; Transparency International**
Search terms	**fraud; occupational fraud; fraud risk management; forensic accounting; internal control; corporate governance; whistleblowing; financial integrity (paired with "Nigeria" for the empirical stream)**
Period	**2013–2026 for the empirical stream; foundational theoretical works retained regardless of age**
Inclusion criteria	**Peer reviewed or authoritative regulatory and professional publications; Nigeria relevant for the empirical stream; English language**
Exclusion criteria	**Non-scholarly blogs; unverifiable grey sources**

Source: Author's construction (2026).

Included evidence was appraised against a three tier source hierarchy. The first tier comprises regulatory, statutory, and audited data, including statutes, codes, regulatory guidelines, and officially published loss and enforcement statistics. The second tier comprises peer reviewed academic studies. The third tier comprises grey literature, including media reports and industry publications, which was treated as indicative rather than definitive; where Nigerian statistics originated in this tier, they were accepted only where corroborated by at least two independent sources, and the figures cited in this paper were cross-checked against primary or authoritative secondary sources.

Synthesis proceeded by thematic framework mapping with constant comparison. The units of comparison were framework elements and principles, drawn from the COSO internal control components and principles, the five fraud risk management principles, the Three Lines Model roles, the requirements of ISA 240, and the provisions of the Nigerian Code of Corporate Governance 2018, the

Companies and Allied Matters Act 2020, and the Money Laundering (Prevention and Prohibition) Act 2022. Each element was compared against every other for functional equivalence, and elements addressing the same fraud risk function were clustered into candidate pillars, which were then compared against the theoretical literature for explanatory warrant and against the Nigerian evidence for contextual fit. Tensions between the rules based character of Nigerian instruments such as the Companies and Allied Matters Act and the Nigerian Code of Corporate Governance on the one hand and the principles based character of the COSO architecture on the other were resolved by treating the Nigerian instruments as setting minimum mandatory floors and the COSO architecture as supplying the design principles by which those floors are exceeded; where the two diverged in form, substance governed. Propositions were derived only where at least two independent strands of theoretical or empirical evidence converged on the same directional claim, and each proposition was required to be falsifiable against observable indicators of financial integrity.

Three credibility strategies were employed. First, an audit trail of mapping decisions was maintained, recording which framework elements were assigned to which pillar and why, so that the synthesis can be inspected and challenged. Second, negative cases were actively considered, including the Nigerian evidence that detection led regimes have not contained losses, which disciplined the framework against overclaiming for any single pillar. Third, the single author design is acknowledged as a limitation: selection and interpretation reflect one researcher's judgement, and reflexivity was exercised by preferring conservative readings of contested evidence and by flagging, rather than resolving, ambiguities in the grey literature.

The framework's boundary conditions are stated explicitly. It addresses medium and large private and public sector organisations in Nigeria, where board structures, audit committees, and formal control systems are present or mandated, with banking and downstream petroleum used as illustrative high exposure sectors rather than as limits on scope; adaptation to small and medium enterprises, whose control capacity and governance formality differ materially, is identified as future work. The framework addresses occupational fraud as defined by the ACFE and does not extend to frauds perpetrated against organisations solely by external parties.

The method has limitations. The search, though protocol guided, was executed by a single author and remains exposed to selection bias, mitigated but not eliminated by the corroboration rules described above. The treatment of statistics is descriptive rather than meta analytic: reported figures are used to establish magnitude and direction, not pooled effect sizes. Finally, the propositions, like all cross sectional governance claims, are exposed to endogeneity, since high integrity organisations may select ethical leaders and stronger controls rather than being produced by them; future empirical tests should employ lag structures and exploit regulatory shocks, such as the introduction of the Nigerian Code of Corporate Governance 2018 and the Central Bank of Nigeria's 2023 corporate governance guidelines, as natural experiments.

4. THE INTEGRATED FRAUD RISK MANAGEMENT AND FINANCIAL INTEGRITY (IFRMFI) FRAMEWORK

4.1 Overview and Logic of the Framework

The IFRMFI Framework rests on a simple causal claim: financial integrity is the joint product of five mutually reinforcing pillars, and weakness in any pillar degrades the output of the whole. The pillars are governance and ethical tone; fraud risk assessment; preventive and detective control activities; whistleblowing, reporting, and continuous monitoring; and investigation, enforcement, and remediation. Each pillar corresponds to identifiable components of the COSO internal control framework and to specific fraud risk management principles, and responsibility for each is distributed across the Three Lines Model, in which management as the first line owns and manages risk, risk and compliance functions as the second line provide expertise and challenge, and internal audit as the third line provides independent assurance to the governing body (IIA, 2020). The framework operates within, and is conditioned by, the Nigerian institutional environment of regulation, enforcement, and professional norms, which functions as a moderating layer: strong institutions amplify the effect of organisational pillars on integrity outcomes, while weak institutions attenuate it. The framework's theoretical spine runs from the fraud diamond, which identifies what must be suppressed, through

agency theory, which explains why monitoring structures are economically rational, to institutional theory, which warns against decoupling form from substance. Figure 1 presents the framework, its outcome variable, and its moderating layer.

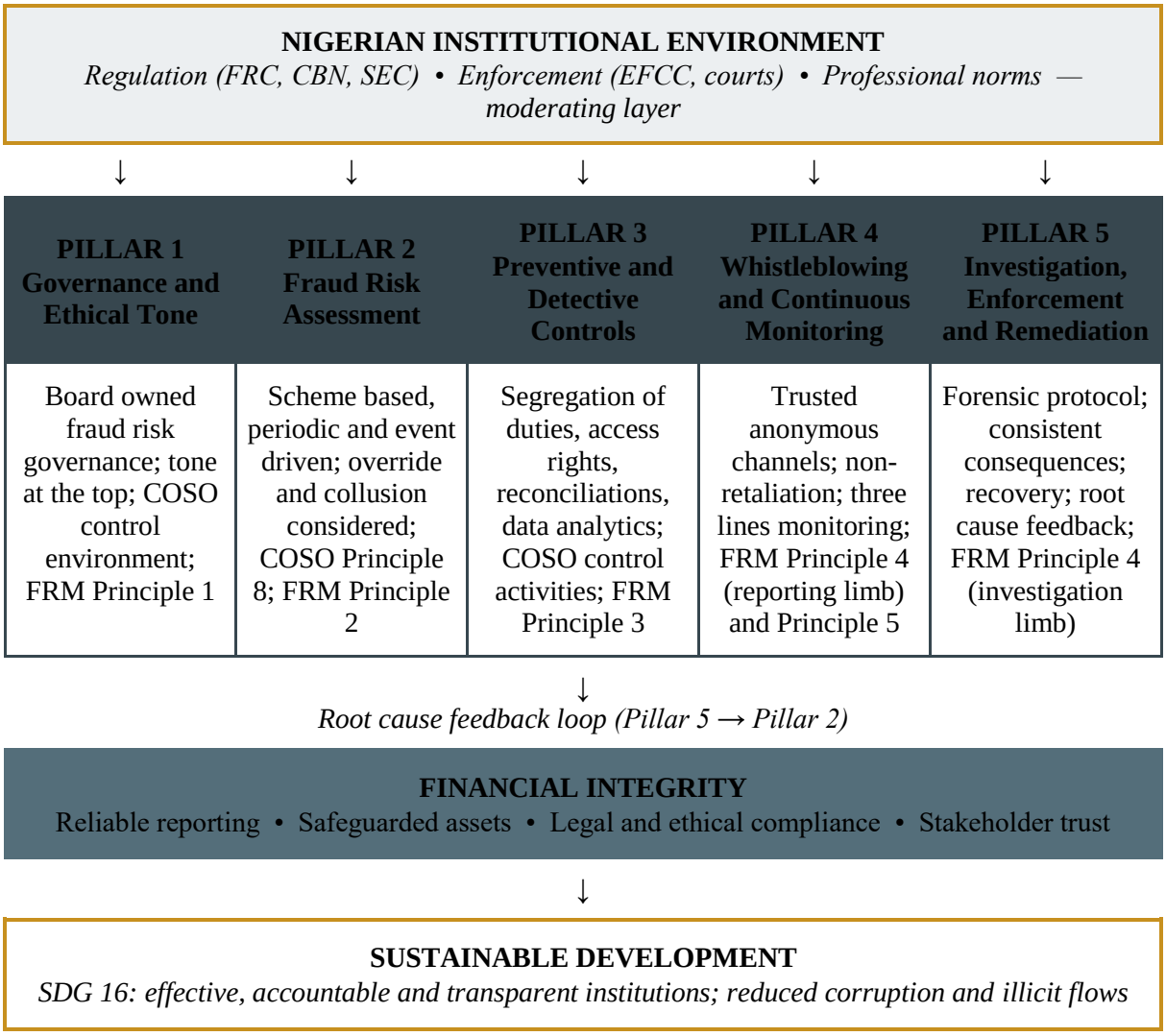


Figure 1: The Integrated Fraud Risk Management and Financial Integrity (IFRMFI) Framework. The five pillars jointly produce financial integrity within a moderating institutional environment; the theoretical spine runs from the fraud diamond through agency theory to institutional theory, and ownership is distributed across the Three Lines Model (IIA, 2020). Source: Author's construction (2026).

4.2 Pillar One: Governance and Ethical Tone

The first pillar establishes board owned fraud risk governance. Concretely, this requires a board approved fraud risk management policy that defines fraud, assigns roles across the three lines, and commits the organisation to zero tolerance enforced through consistent consequences; an audit or risk committee with the independence, financial literacy, and information rights to oversee the programme, as contemplated by the Nigerian Code of Corporate Governance (FRC, 2018); a code of conduct communicated to and attested by all staff and relevant third parties; and visible executive behaviour that matches stated values, since tone at the top is transmitted through what leaders do, tolerate, and reward rather than through what they publish. Theoretically, this pillar attacks rationalisation and, through Sutherland's lens, shapes the learned norms circulating within the organisation, while in agency terms it constitutes the decision control apparatus that disciplines decision management (Fama & Jensen, 1983; Sutherland, 1949). It maps to the COSO control environment component and to the first fraud risk management principle (COSO, 2013; COSO & ACFE, 2023).

4.3 Pillar Two: Fraud Risk Assessment

The second pillar requires a comprehensive, periodic, and event driven fraud risk assessment that identifies fraud schemes specific to the organisation's business model, assesses their likelihood and significance, evaluates existing mitigating controls, and explicitly considers management override and collusion, the two conditions under which otherwise sound controls fail (COSO & ACFE, 2023). The assessment should be scheme based rather than account based: for a downstream petroleum marketer, for example, it should interrogate schemes such as unauthorised retail price adjustments, product diversion, meter and dip manipulation, and procurement kickbacks; for a bank, it should address the channel and instrument level exposures evident in sectoral loss data (FITC, 2024). Outputs must feed the enterprise risk register, the design of control activities under pillar three, the internal audit plan, and board reporting, so that the assessment functions as the connective tissue of the framework rather than a filed document. This pillar operationalises COSO principle eight and the risk assessment component, and theoretically it is the systematic search for the opportunity and capability vertices of the fraud diamond before offenders find them (COSO, 2013; Wolfe & Hermanson, 2004).

4.4 Pillar Three: Preventive and Detective Control Activities

The third pillar deploys control activities proportionate to the assessed risks. Preventive controls compress opportunity ex ante and include segregation of duties, delegation of authority frameworks with defined financial limits, system enforced access rights, independent reconciliations, physical safeguards over cash and inventory, and pre employment screening calibrated to role sensitivity. Detective controls surface violations ex post and increasingly rest on data analytics: continuous monitoring of transactions against rule based and anomaly based tests, exception reporting on overrides and manual journal entries, trend analysis of margins and shrinkage, and surprise counts and audits. The empirical warrant for this pillar is direct: the ACFE finds that victim organisations with relevant anti fraud controls in place suffer materially lower losses and detect frauds faster, with organisations operating formal reporting mechanisms recording median losses of 100,000 dollars against 150,000 dollars and detection in eleven months against seventeen (ACFE, 2026). Recent analytics research strengthens the detective side of the pillar: firm level artificial intelligence adoption has been shown to reduce fraud likelihood and severity through improved information transparency and internal control (Sun, Ling, Li, & Xie, 2025), graph based machine learning methods now achieve strong fraud detection performance (Motie & Raahemi, 2024), and Nigerian focused work documents both the potential and the implementation constraints of such techniques locally (Odufisan, Abhulimen, & Ogunti, 2025). The pillar corresponds to the COSO control activities and information and communication components and to the third fraud risk management principle, and in Becker's economic terms it raises the perceived probability of detection, which is the most powerful lever of deterrence (Becker, 1968; COSO, 2013; COSO & ACFE, 2023).

4.5 Pillar Four: Whistleblowing, Reporting, and Continuous Monitoring

Because tips detect more fraud than any other mechanism, accounting for 43 per cent of detections in the ACFE's 2026 global study (ACFE, 2026), the fourth pillar treats the whistleblowing system as a primary control rather than a peripheral formality. An effective system provides multiple channels, including at least one anonymous and externally administered channel; guarantees non retaliation with visible enforcement of that guarantee; extends access to vendors, customers, and other third parties, who supply a meaningful share of tips; and closes the loop through triage, case management, and feedback. The Nigerian Code of Corporate Governance already obliges companies to establish effective whistleblowing frameworks, so the task in Nigeria is one of substance over form: converting mandated hotlines into trusted channels (FRC, 2018). Continuous monitoring completes the pillar, encompassing management self assessment of control operation, second line testing, and third line audit under the Three Lines Model, with deficiencies tracked to remediation and reported to the governing body (COSO & ACFE, 2023; IIA, 2020). Institutional theory issues its sharpest warning here: a hotline that exists but is not trusted is legitimacy theatre, and the framework therefore measures this pillar by usage, substantiation rates, and retaliation incidents rather than by the existence of a policy (DiMaggio & Powell, 1983).

4.6 Pillar Five: Investigation, Enforcement, and Remediation

The fifth pillar governs the organisation's response when prevention and detection identify suspected fraud. It requires an investigation protocol that assigns clear authority, protects evidence to forensic standards, safeguards the rights of subjects, and engages qualified forensic accounting expertise for complex matters; consistent enforcement of consequences, internally through discipline and externally through referral to the Economic and Financial Crimes Commission or other agencies where thresholds are met, since deterrence fails where offenders can reasonably expect impunity (Becker, 1968), an expectation that the ACFE evidence shows is encouraged whenever organisations decline to refer substantiated cases for prosecution (ACFE, 2024, the edition in which the case disposition breakdown is reported); recovery action to restore losses; and, critically, root cause analysis that feeds each substantiated case back into the fraud risk assessment and control design, converting every loss event into a control improvement. This pillar is where forensic accounting, the traditional focus of the Nigerian literature, is housed within the integrated architecture: forensic capability remains indispensable, but it is positioned as the terminal pillar of a preventive system rather than the system itself, consistent with the evidence that Nigerian forensic accounting is effective at detection and investigation (Gbegi & Adebisi, 2014; Modugu & Anyaduba, 2013) while sectoral losses continue to escalate under detection led regimes (FITC, 2024).

4.7 Mapping of the Framework to Authoritative Guidance

Table 3 maps the five pillars to the COSO internal control components, the COSO and ACFE fraud risk management principles, and primary responsibility under the Three Lines Model.

Table 3: *Mapping of IFRMFI Pillars to COSO Components, Fraud Risk Management Principles, and the Three Lines Model*

IFRMFI Pillar	**COSO (2013) Component**	**COSO & ACFE (2023) Principle**	**Primary Responsibility (IIA, 2020)**
1. Governance and ethical tone	Control environment	Principle 1: Fraud risk governance	Governing body; first line
2. Fraud risk assessment	Risk assessment (incl. Principle 8)	Principle 2: Fraud risk assessment	First line, facilitated by second line
3. Preventive and detective control activities	Control activities; information and communication	Principle 3: Fraud control activities	First line; second line design support
4. Whistleblowing, reporting, and continuous monitoring	Information and communication; monitoring activities	Principle 4 (reporting limb): fraud reporting mechanisms, intake and triage; Principle 5: monitoring activities and evaluation	All three lines; third line assurance
5. Investigation, enforcement, and remediation	Monitoring activities; control environment (consequences)	Principle 4 (investigation limb): coordinated investigation, consequences and corrective action	Second line and forensic specialists; governing body oversight

Source: Author's synthesis (2026), based on COSO (2013), COSO and ACFE (2023), and IIA (2020).

Note: Principle 4 of COSO and ACFE (2023) covers two operationally distinct activities, namely the establishment of fraud reporting mechanisms and the conduct of coordinated investigation and corrective action. The framework subdivides the principle along that internal boundary rather than assigning it twice: the reporting, intake, and triage limb is discharged under Pillar 4, together with the

whole of Principle 5 on monitoring, while the investigation, consequence, and remediation limb is discharged under Pillar 5. No other principle is shared between pillars, and each pillar therefore retains a distinct and non-redundant function within the framework.

4.8 Propositions

The framework yields the following testable propositions, each stated at the organisational level with financial integrity operationalisable through indicators such as fraud loss incidence and magnitude, audit adjustments and restatements, control deficiency trends, and substantiated misconduct outcomes.

The propositions that follow are theoretically derived and are not empirically confirmed causal claims. They are expressed in directional language, such as positively associated with, negatively associated with, and suppresses, solely to render them falsifiable and testable; each should be read as a theorised association awaiting empirical validation. Consistent with the limitations acknowledged in section three, cross sectional tests of claims of this kind are exposed to endogeneity, since organisations of high integrity may select stronger controls and more ethical leaders rather than being produced by them. Directional wording therefore denotes the hypothesised direction of an association to be tested, and future empirical work should establish causal ordering through lag structures, panel designs, and regulatory shocks used as natural experiments.

Proposition 1. The strength of board owned fraud risk governance and ethical tone is positively associated with organisational financial integrity, because a credible ethical tone suppresses rationalisation and normalises resistance to management override; the construct is measurable through ethics climate survey scores and code attestation and enforcement records.

Proposition 2. The comprehensiveness and integration of fraud risk assessment, including explicit assessment of management override and collusion, is positively associated with organisational financial integrity.

Proposition 3a. The operating effectiveness of preventive and detective control activities, rather than their documentary existence, is positively associated with organisational financial integrity.

Proposition 3b. Data analytics enabled detective controls strengthen the positive association in Proposition 3a by shortening detection latency.

Proposition 4. The trustworthiness of whistleblowing mechanisms, evidenced by usage, substantiation, and the absence of retaliation, is positively associated with fraud detection speed and negatively associated with fraud loss magnitude.

Proposition 5. The consistency of investigation, enforcement, and remediation, including the feedback of root causes into control design, is negatively associated with fraud recurrence.

Proposition 6. Three dimensions of the external institutional environment, namely regulatory enforcement capacity, judicial efficiency, and corruption perception, moderate the relationships between the five pillars and financial integrity, such that stronger enforcement capacity, more efficient courts, and lower perceived corruption amplify the pillars' positive effects, while weakness on these dimensions attenuates them.

5. DISCUSSION AND IMPLICATIONS

5.1 Implications for Boards and Management

For boards and executive management, the central implication is that fraud risk management must be governed as an integrated system with explicit ownership, not administered as a set of disconnected artefacts. Boards should demand a single integrated view: one fraud risk assessment feeding one control improvement plan, monitored through one deficiency tracker, assured by one risk based internal audit plan, and reported through one committee. Management should measure the system by outcomes, including loss incidence, detection speed, tip volumes and substantiation rates, override exceptions, and remediation closure, rather than by policy counts. In sectors with acute exposure, such as banking and downstream petroleum, the scheme based fraud risk assessment of pillar two should drive investment towards the specific preventive and analytic detective controls that the organisation's

own loss experience and the sectoral evidence identify as most consequential (ACFE, 2026; FITC, 2024).

5.2 Implications for Regulators and Policymakers

For the Financial Reporting Council, the Central Bank of Nigeria, the Securities and Exchange Commission, and sector regulators, the framework suggests a shift in supervisory emphasis from the existence of governance structures to evidence of their operation. Apply and explain reporting under the Nigerian Code of Corporate Governance could be deepened by requiring disclosure of fraud risk assessment coverage, whistleblowing usage and outcome statistics, and remediation performance, which would convert integrity from an asserted attribute into a reported one (FRC, 2018). For the anti corruption agencies, the enforcement gains reflected in recent recoveries and in Nigeria's exit from the Financial Action Task Force grey list are necessary but insufficient; national strategy should pair enforcement with regulatory incentives for preventive architecture, because prevention scales in a way that prosecution cannot (The Guardian, 2025; FATF, 2025). The case for comprehensive whistleblower protection legislation is now precise and urgent: the 2016 federal whistleblower policy remains administrative policy rather than statute, and the whistleblower protection bill before the National Assembly, reintroduced in the House of Representatives in November 2024, has seen no action since January 2025, so the credibility of pillar four at national level still depends on legal protection that does not yet exist. Recent regulatory development nonetheless points in the right direction, including the Central Bank of Nigeria's 2023 corporate governance guidelines for banks and financial holding companies and the Investments and Securities Act 2025, which together deepen board level accountability and enforcement capacity (Central Bank of Nigeria, 2023; Federal Republic of Nigeria, 2025).

5.3 Implications for the Forensic Accounting Profession and Accounting Education

For practitioners, the framework repositions forensic accounting from a reactive investigative service to a design discipline: forensic insight into how schemes actually operate should inform fraud risk assessments and the construction of detective analytics before losses occur, in addition to supporting investigations after them. For professional bodies and universities, the implication is curricular: fraud risk management, data analytics, governance, and forensic methods should be taught as an integrated body of knowledge rather than as separate electives, so that graduates enter practice able to operate across the pillars. This aligns with the longstanding emphasis in Nigerian accounting scholarship on accountability as the discipline's organising purpose (Dandago, 2009).

5.4 Financial Integrity and Sustainable Development

Finally, the framework specifies the mechanism by which organisational integrity aggregates into development outcomes. Fraud losses are a direct leakage from the investable and taxable surplus of the economy; reporting fraud misprices capital and misallocates it; corruption raises transaction costs and excludes honest competitors; and each publicised failure depletes the institutional trust that Goal 16 identifies as a development asset in its own right (United Nations, 2015). Conversely, organisations that operate the five pillars contribute measurable public goods: reliable financial information, protected assets, credible tax bases, and demonstrated accountability. Strengthening financial integrity through accounting, taxation, and governance, the theme of this conference, is therefore not a metaphorical contribution to sustainable development but a literal one, transmitted through the balance sheets, tax returns, and governance disclosures of individual organisations.

6. CONCLUSION, LIMITATIONS AND FUTURE RESEARCH

This paper set out to address the fragmentation of anti fraud practice and scholarship in Nigeria by developing an integrated framework linking fraud risk management, internal control, and corporate governance to financial integrity and sustainable development. Synthesising authoritative professional guidance with behavioural, economic, and institutional theory and with global and Nigerian evidence, the paper proposed the five pillar IFRMFI Framework and advanced seven testable propositions, numbered one to six with Proposition 3 stated in two parts as 3a and 3b. The framework's central argument is that financial integrity is an emergent property of a system: governance supplies legitimacy

and tone, assessment supplies foresight, controls compress opportunity, reporting and monitoring supply detection, and investigation and enforcement supply deterrence and learning, with the external institutional environment moderating the whole. No pillar substitutes for another, and the documented Nigerian pattern of active enforcement alongside escalating losses is precisely what the framework predicts when the terminal pillar is strong and the preventive pillars are weak.

The paper has limitations inherent in its conceptual design. The framework has not been empirically validated, its propositions await operationalisation and testing, and its illustrative sectoral references do not exhaust the diversity of Nigerian organisational contexts. Future research should proceed in three directions. First, survey and archival studies should test the propositions across listed companies, banks, and public entities, using loss, restatement, and deficiency data as integrity outcomes. Second, qualitative case studies should examine decoupling directly, comparing documented fraud risk management structures with observed practice to identify the conditions under which form becomes substance. Third, longitudinal work should trace whether improvements in pillar level maturity precede reductions in fraud losses and improvements in reporting quality, thereby establishing the causal ordering the framework asserts. Through such a programme, Nigerian accounting research can move beyond confirming that forensic accounting detects fraud towards explaining how organisations and institutions together produce the financial integrity on which sustainable development depends.

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