

**ADMINISTRATION OF ACTU EFFECTIVENESS INDEX (AEI) IN  
MDAs 2020**



## **Forward**

One of the initiatives introduced by the Independent Corrupt Practices and Other Related Offences Commission in public organisations is the Anti-Corruption and Transparency Unit (ACTU). ACTUs are set up to serve as an in-house check mechanism for corruption prevention within MDAs with responsibility to support the organization to promote accountability in organizational system and operations.

To measure the effectiveness and performance of ACTUs within MDAs, the ICPC introduced a tool called the ACTU Effectiveness Index. The Index assesses several elements of ACTU operations which include the composition, inauguration and induction of the Unit, ACTU Action Plan, Office Accommodation and facilities, budgets and funding, support by ICPC ACTU Desk officers, impact of organizational support to ACTU, ACTU member capacities and ACTU sustainability. The assessment serves as a means of generating the required knowledge about ACTU operations in order to inform and guide the Commission to make the ACTUs more functional and effective as well as determining the impact of ACTUs in MDAs.

Notwithstanding the Covid-19 pandemic and the resultant restrictions, the Commission deployed the template in 352 MDAs nationwide in 2020. However, only 161 MDAs completed and submitted the Index. The assessment revealed that 26 ACTUs were Very Effective representing 16%, 48 Effective representing 30%, 64 Ineffective representing 40%, 14 Dormant representing 9% and 9 Non-existent which is 5%.

The Commission would commence an aggressive monitoring of MDAs who have an ineffective, dormant and non-existent ACTU status to ensure that the ACTUs are reactivated and made effective within the MDAs. The Commission would also work closely with the Office of the Secretary to the Government of the Federation (OSGF) and the Office of the Head of Service of the Federation to ensure that Chief Executive Officers of MDAs comply strictly with the extant circulars on establishment and operations of ACTUs in the MDAs. MDAs are enjoined to support the ACTU initiative by seeing it as a complementary tool to improve efficiency and accountability within their organisations.

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## **1. INTRODUCTION**

In line with the preventive mandate of the Independent Corrupt Practices and Other Related Offences Commission enshrined in Section 6(b)-(d) of the Corrupt Practices and Other Related Offences Act 2000, Anti- Corruption and Transparency Units (ACTUs) were established in Ministries, Departments and Agencies (MDAs) as monitoring mechanism units. ACTU has the responsibility to support the organization to promote accountability and transparency in government entities. It also highlights activities undertaken by ACTU, how they are undertaken and accomplished and the capacity of the ACTU to enhance organizational performance. These should reflect effective accountability systems in the MDAs' operations, improved service delivery and social benefits to stakeholders and the citizenry.

ACTU Effectiveness Index (AEI) was therefore developed as a tool to measure ACTU performance in their respective MDAs.

## 2. OBJECTIVES

- a) To serve as a monitoring tool of ACTUs and their activities
- b) To assess ACTUs through the Index to generate required knowledge about ACTU operations to inform and guide ICPC to make the ACTUs more functional and effective.
- c) To ensure the integrity and accountability compliance of the MDAs.
- d) To determine the impact of ACTUs in MDAs

## 3. ELEMENTS OF THE AEI

The ACTU Effectiveness Index assesses several elements of ACTU operations which include the composition of members, inauguration and induction, action plan, office accommodation and facilities. It also evaluates ACTUs budgets and funding, support by ICPC ACTU Desk Officers, impact of organizational support on ACTU and ACTU members' capacities, effectiveness, operations, processes and ACTU sustainability.

**TABLE :1**

| <b>KEY MEASURING ELEMENTS AND THE ASSIGNED PERCENTAGE</b> |  |                   |
|---|--|-------------------|
| <b>S/N</b>  | <b>ELEMENTS OF AEI</b>   | <b>% ALLOTTED</b> |
| 1   | COMPOSITION OF THE UNIT MEMBERS                                  | 10                |
| 2   | INAUGURATION/ INDUCTION  | 6                 |
| 3   | ACTION PLAN  | 10                |
| 4   | OFFICE ACCOMODATION AND FACILITIES                               | 10                |
| 5   | BUDGET AND FUNDING   | 20                |
| 6   | SUPPORT TO ACTU BY ICPC DESK OFFICER                             | 10                |
| 7   | ORGANIZATIONAL CONTEXT AND IMPACT ON ACTU CAPACITY/EFFECTIVENESS | 8                 |
| 8   | OPERATIONS   | 14                |
| 9   | PROCESS  | 8                 |
| 10  | SUSTAINABILITY   | 4                 |
| <b>TOTAL</b>  |  | <b>100</b>        |

**TABLE: 2**

| <b>S/N</b> | <b>SCORE (%)</b> | <b>LEVEL OF EFFECTIVENESS</b> | <b>COLOUR RATING</b> |
|------------|------------------|-------------------------------|----------------------|
| <b>1</b>   | <b>70-100</b>    | <b>VERY EFFECTIVE</b>         | <b>GREEN</b>         |
| <b>2</b>   | <b>50-69</b>     | <b>EFFECTIVE</b>              | <b>BLUE</b>          |
| <b>3</b>   | <b>11-49</b>     | <b>INEFFECTIVE</b>            | <b>YELLOW</b>        |
| <b>4</b>   | <b>1-10</b>      | <b>DORMANT</b>                | <b>RED</b>           |
| <b>5</b>   | <b>0</b>         | <b>NON-EXISTENT</b>           | <b>BLACK</b>         |

#### **4. METHODOLOGY**

The ACTU Effectiveness Index (AEI) was administered with the Ethics and Compliance Scorecard (ECS). 352 MDAs were selected considering the various sectors, their contributions to the economy, importance of agencies in ensuring government drive for efficient service delivery and the Commission's mandate of ensuring transparency and accountability in public institutions. MDAs were requested via a letter to download the tools from the Commission's website through links provided in the letter, complete the tools, upload their evidential documents and submit within the timeline stipulated. Only 161 of the MDAs responded.

#### **5. LIMITATIONS**

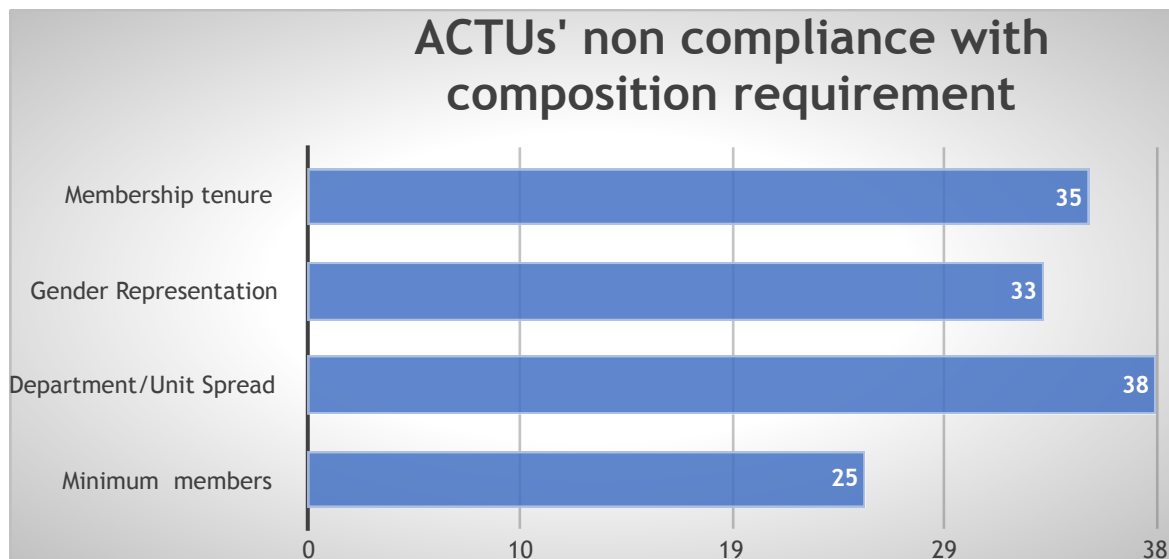
- i. Effects of the COVID-19 pandemic including irregular working hours and movement restrictions of appropriate personnel made it challenging for some MDAs to respond to the AEI.

- ii. Virtual deployment being implemented for the first time, created certain challenges: MDAs complained of lack of access to internet; lack of appropriate staff to act; difficulty in uploading large documents and materials supposedly forwarded on-line were not clear.
- iii. Many MDAs declined to forward contact persons to relate between the Commission and their respective MDAs for ease of deployment.
- iv. Poor appraisal and understanding of the AEI tool by responding officers of the MDAs.

## 6.0 ANALYSES

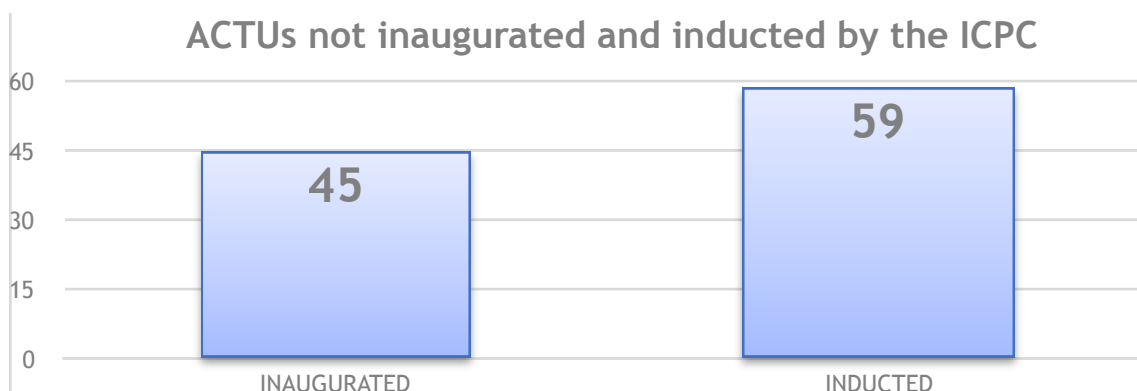
161 MDAs forwarded their submissions within the set time frame. Responses from the organizations were comprehensively vetted, analysed and compiled for the report.

**FIG. 1**



On the element of composition of members, it was observed that ACTUs did not comply with tenure of 3 years and reappointment for another 3 years while 33 MDAs do not have gender representation. 38 MDAs are not in compliance with the requirement of ensuring widespread consultation or have been inaugurated without approval from the Commission. ACTU membership are not up to the required minimum of (five) 5 members in some cases.

**FIG. 2**



On the element of inauguration and induction, the average score is 3.98% of the allotted score of 6% which is above the average. Here 45 MDAs ACTUs were inaugurated without the collaboration of the Commission while 59 ACTUs were not inducted.

**TABLE:3**

| <b>ACTU ACTION PLAN COMPLIANT REQUIREMENT</b>       | <b>NUMBER OF MDAs</b> |
|---|-----------------------|
| NO ACTION PLAN                                      | 99                    |
| NOT FOLLOWING ACTION PLAN                           | 102                   |
| NO REVIEW OF ACTION PLAN                            | 115                   |
| ACTION PLAN WITHOUT KPI                             | 127                   |
| ACTU ACTIVITIES WITHOUT PERFORMANCE MANAGEMENT PLAN | 117                   |

The average scores of 2.59% of the 10% allotted percentage result from action plan elements suggest that the ACTUs do not formulate action plans preparatory to carrying out their activities; while 99 ACTUs do not have action plans and ACTU activities are conducted without performance management plans.



**FIG. 3**

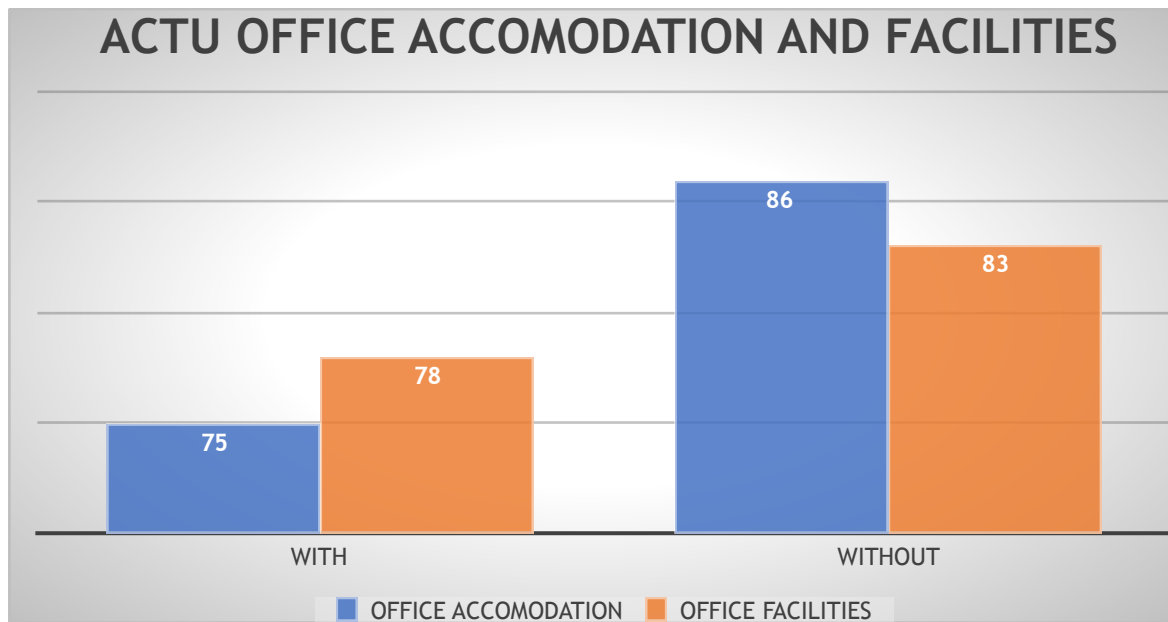


FIG. 4 shows that many ACTUs do not have office space and facilities for effective performance. Of 161 ACTUs, 75 ACTUs have office accommodation and 78 ACTUs with office facilities while 86 ACTUs and 83 ACTUs are without office accommodations and facilities respectively.

**TABLE: 4**

| <b>BUDGET AND FUNDING</b> |   |                         |                     |                       |                                    |
|---------------------------|---|-------------------------|---------------------|-----------------------|------------------------------------|
| <b>S / N</b>              | <b>QUESTIONS</b>  | <b>% ALLO TED SCORE</b> | <b>TO TAL SCORE</b> | <b>AVER AGE SCORE</b> | <b>MD As WI TH ZER O (0) SCORE</b> |
| i                         | Do ACTU members formulate their budget in line with standard accounting procedures?   | <b>2</b>                | <b>134</b>          | <b>0.85</b>           | <b>87</b>                          |
| ii                        | Has budget been approved, allocated and disbursed to ACTU during the period under review? If No, Why?   | <b>4</b>                | <b>124</b>          | <b>0.78</b>           | <b>120</b>                         |
| iii                       | Is the budget allocated to the ACTU in line with Performance and Action Plans (Budget Plan)?  | <b>3</b>                | <b>84.</b>          | <b>0.53</b>           | <b>129</b>                         |
| iv                        | What is the evidence of budget implementation: (financial reports)?   | <b>3</b>                | <b>39.</b>          | <b>0.25</b>           | <b>129</b>                         |
| v                         | Do ACTU members have the skills to monitor, track and assess the use of the budgets of the units in line with the performance and results accomplished? (training or presence of qualified accountants) | <b>1</b>                | <b>101</b>          | <b>0.64</b>           | <b>59</b>                          |
| vi                        | Do they have adequate auditing skills to identify risks during budget implementation? (training or presence of qualified auditor)   | <b>1</b>                | <b>96.</b>          | <b>0.61</b>           | <b>62</b>                          |
| vii                       | Does the ACTU produce regular budget implementation reports?  | <b>3</b>                | <b>48</b>           | <b>0.30</b>           | <b>135</b>                         |
| vii                       | Does ACTU submit budget implementation reports bi-annually to the finance department for review?  | <b>3</b>                | <b>26.</b>          | <b>0.17</b>           | <b>146</b>                         |
| <b>TOTAL</b>              |   | <b>20</b>               |                     | <b>4.12</b>           |                                    |

ACTUs scored very low on budget and funding. The average score is 4.12% of the 20% allotted. 87 ACTUs do not formulate their budgets while 120 ACTUs said budgets were not approved.

**TABLE: 5**

| <b>SUPPORT TO ACTU BY ICPC DESK OFFICER</b> |   |                         |                    |                      |                                 |
|---|---|-------------------------|--------------------|----------------------|---------------------------------|
| <b>S / N</b>                                | <b>QUESTIONS</b>  | <b>% ALLOTTED SCORE</b> | <b>TOTAL SCORE</b> | <b>AVERAGE SCORE</b> | <b>MDAs WITH ZERO (0) SCORE</b> |
| <b>i</b>                                    | Does the ACTU have an assigned ICPC ACTU Desk Officer?  | 2                       | 272                | 1.7                  | 21                              |
| <b>ii</b>                                   | Does ICPC have a policy that defines the functions and responsibilities of the ACTU Desk Officer? (ACTU Standing Order) | 1                       | 146                | 0.9068<br>323        | 18                              |
| <b>iii</b>                                  | Do ACTU members know about the functions and responsibilities of the ACTU Desk Officer?                                 | 1                       | 134                | 0.8322<br>981        | 28                              |
| <b>iv</b>                                   | Does the ACTU Desk Officer have the skills, experience, expertise and integrity to advise and guide the ACTU?           | 1                       | 130.<br>5          | 0.8156<br>25         | 29                              |
| <b>v</b>                                    | Does the ACTU Desk Officer take part in ACTU meetings?  | 1                       | 92                 | 0.5714<br>286        | 68                              |
| <b>Vi</b>                                   | Does the ACTU Desk Officer take part in ACTU activities?  | 1                       | 91.5               | 0.5683<br>23         | 68                              |
| <b>Vi<br/>i</b>                             | Does the ACTU have access to the ACTU Desk Officer?   | 1                       | 125.<br>5          | 0.7795<br>031        | 35                              |
| <b>Ix</b>                                   | Does the ACTU update ACTU Desk Officer on ACTU activities if he/she is not present or able to participate?              | 1                       | 108                | 0.675                | 51                              |

|              |  |           |       |               |    |
|--------------|--|-----------|-------|---------------|----|
| <b>X</b>     | How will the ACTU rate the oversight functions of the ACTU Desk Officer? | 1         | 100.8 | 0.626087      | 40 |
| <b>TOTAL</b> |  | <b>10</b> |       | <b>7.4751</b> |    |

ACTUs do not have desk officers and ACTUs do not have policies that define the functions and responsibilities of the ACTU Desk Officer (ACTU Standing Order). Under this element, ACTUs' average score is 7.48% of 10% allotted which is above average.

**TABLE:6**

| <b>ORGANIZATIONAL CONTEXT AND IMPACT ON ACTU CAPACITY/EFFECTIVENESS</b> |  |                         |                    |                      |                                 |
|---|--|-------------------------|--------------------|----------------------|---------------------------------|
| <b>S/N</b>  | <b>QUESTIONS</b>   | <b>% ALLOTTED SCORE</b> | <b>TOTAL SCORE</b> | <b>AVERAGE SCORE</b> | <b>MDAs WITH ZERO (0) SCORE</b> |
| <b>i</b>  | Does ACTU follow specific action plans in the performance of activities?   | 0.5                     | 42.7               | 0.27                 | 88                              |
| <b>ii</b>   | Does the Organization have a defined structure that includes the ACTU? (Organogram)  | 0.5                     | 24.7               | 0.15                 | 111                             |
| <b>iii</b>  | Does the Organization have an operational strategy containing its vision, mission, and core values?                                      | 0.5                     | 54.1               | 0.34                 | 57                              |
| <b>iv</b>   | Does the Management alone define the overall organizational strategic plan?  | 0.5                     | 38.4               | 0.24                 | 92                              |
| <b>v</b>  | Have entities within entire Organization been consulted and participated in the development of the strategic plan?                       | 0.5                     | 35.5               | 0.22                 | 88                              |
| <b>vi</b>   | Based on the strategic plan, have operational manuals been produced and distributed to all departments/units?                            | 0.5                     | 27.5               | 0.17                 | 103                             |
| <b>vii</b>  | Does everyone in the organization, including ACTU, know the contents of the organizational strategic plan?                               | 0.5                     | 31.2               | 0.20                 | 96                              |
| <b>viii</b>   | Do ACTU members know the specific sections of the organizational strategic plan that concern the ACTU?                                   | 0.5                     | 29.6               | 0.19                 | 100                             |
| <b>ix</b>   | Does the Organization have policies and procedures to guide operations, performance, professional conduct and service delivery?          | 0.5                     | 53.15              | 0.33                 | 55                              |
| <b>x</b>  | Does the Organization have ethics and compliance systems to guide its structure, operations, service processes, policies and procedures? | 0.75                    | 65.36              | 0.41                 | 63                              |
| <b>xi</b>   | Does the Organization enforce compliance with the integrity policies and extant laws?  | 0.5                     | 50.6               | 0.32                 | 55                              |
| <b>xii</b>  | Has the Organization been evaluated by performance assessments and audits?   | 0.25                    | 24.57              | 0.15                 | 67                              |

|              |   |          |       |             |     |
|--------------|---|----------|-------|-------------|-----|
| <b>xii i</b> | Has the Organization been validated to be compliant with ethics and integrity standards?  | 0.25     | 13.12 | 0.08        | 107 |
| <b>xi v</b>  | Does the Organization have whistleblowing policies and procedures, including legal protections for whistleblowers?                            | 0.5      | 17    | 0.11        | 121 |
| <b>xv</b>    | Does the Organization have policies and procedures to regulate and protect confidential information in all departments/units, including ACTU? | 0.5      | 33.1  | 0.21        | 88  |
| <b>xv ii</b> | Does the Organization have policies on retaliatory and retributive practices against whistleblowers?  | 0.5      | 11.1  | 0.07        | 135 |
| <b>xv ii</b> | Does the Organization have policies on rewards, discipline, sanctions, etc.?  | 0.25     | 28.92 | 0.18        | 66  |
| <b>TOTAL</b> |   | <b>8</b> |       | <b>3.63</b> |     |

Organisational context and impact on ACTU capacity are key elements in ensuring effectiveness of ACTUs. Here average score is 3.63% of the 8% allotted which is lower than the expected average. It shows that ACTUs do not follow specific action plans, no defined structure with ACTUs in their organisations (organogram) etc, MDAs do not have ACTU in their structures.

**TABLE: 7**

| <b>OPERATIONS</b> |   |                   |                      |
|-------------------|---|-------------------|----------------------|
| <b>S/N</b>        | <b>QUESTIONS ON ACTU STRUCTURE AND CAPACITIES</b> | <b>% ALLOTTED</b> | <b>AVERAGE SCORE</b> |
| <b>i</b>          | ACTU Authority                                    | 1.5               | 0.85                 |
| <b>iii</b>        | ACTU Structure:                                   | 3.5               | 2.05                 |
| <b>iv</b>         | ACTU Member Capacities:                           | 1                 | 0.54                 |
| <b>v</b>          | ACTU Resource Capacities:                         | 3                 | 1.32                 |
| <b>vi</b>         | ACTU Performance Capacity:                        | 5                 | 2.81                 |
| <b>TOTAL</b>      |   | <b>14</b>         | <b>7.57</b>          |

The level of authority and capacity of ACTUs to carry out their operation is very low. The ACTUs scored an average of 7.57% of the 14% allotted.

**TABLE: 8**

| <b>PROCESS</b> |  |                         |                     |                       |                                 |
|----------------|--|-------------------------|---------------------|-----------------------|---------------------------------|
| <b>S / N</b>   | <b>QUESTIONS</b>   | <b>% ALLO TED SCORE</b> | <b>TO TAL SCORE</b> | <b>AVER AGE SCORE</b> | <b>MDAs WITH ZERO (0) SCORE</b> |
| <b>i</b>       | Does ACTU follow the organizational strategic plan in the performance of its activities? | 1                       | 63.7                | 0.40                  | 93                              |
| <b>ii</b>      | Does ACTU follow the Standing Order in the performance of its activities?                | 0.5                     | 56.8                | 0.36                  | 48                              |
|                | Does ACTU conduct monthly meetings?  | 0.5                     | 38.9<br>9           | 0.24                  | 80                              |
|                | Has the ACTU conducted preliminary investigation of petitions?                           | 0.5                     | 18.7                | 0.12                  | 122                             |
|                | Has the ACTU conducted System Study and Review/ Corruption Risk Assessment (CRA)?        | 1                       | 25.5                | 0.16                  | 132                             |
|                | Has the ACTU conducted Education and Public Enlightenment activities?                    | 0.5                     | 31.2                | 0.20                  | 97                              |
|                | Has the ACTU conducted Monitoring of Budget Implementation?                              | 0.5                     | 12.7                | 0.08                  | 134                             |
|                | Has the ACTU Implemented the Ethics and Compliance Score Card?                           | 0.5                     | 25.5                | 0.16                  | 121                             |
|                | Has the ACTU organized an Ethics and Integrity Assessment Forum?                         | 0.5                     | 11.5                | 0.07                  | 147                             |
| <b>iii</b>     | Does the ACTU have a performance monitoring plan?  | 1                       | 9.2                 | 0.06                  | 140                             |
| <b>iv</b>      | Does the ACTU follow the performance monitoring plan?                                    | 0.5                     | 11.2                | 0.07                  | 138                             |

|              |  |          |       |             |     |
|--------------|--|----------|-------|-------------|-----|
| <b>v</b>     | Does the ACTU collaborate with other departmental units in the performance of activities?                                | 0.5      | 38.95 | 0.24        | 81  |
| <b>iv</b>    | Does ACTU consult with management of the organization in the performance of activities? (Evidence of Management meeting) | 0.5      | 25    | 0.16        | 107 |
| <b>TOTAL</b> |  | <b>8</b> |       | <b>2.31</b> |     |

The process indicators show the activities executed by the ACTU. The average score is low that is 2.31% of 8% allotted. The analyses show that ACTUs do not conduct investigations, ACTUs do not conduct system study or corruption risk assessment, ACTUs did not carry out sensitization activities and no budget implementation monitoring activities.

**TABLE:9**

| <b>SUSTAINABILITY</b> |  |                          |                      |                        |                                    |
|-----------------------|--|--------------------------|----------------------|------------------------|------------------------------------|
| <b>S / N</b>          | <b>QUESTIONS</b>   | <b>% ALLO TED SCOR E</b> | <b>TOT AL SCOR E</b> | <b>AVER AGE SCOR E</b> | <b>MDA S WIT H ZERO (0) SCOR E</b> |
| i                     | Does the ACTU collaborate with other agencies within its mandate area in anti-corruption programs? (Evidence of visits, MOUs, letters, seminars/ workshops should be used to verify).  | 0.5                      | 15.6                 | 0.10                   | 128                                |
| ii                    | Does the ACTU communicate with other national agencies? (e.g., to share knowledge, skills, information, and other resources in corruption control initiatives) - (Peer-Review).  | 0.5                      | 17.4                 | 0.11                   | 123                                |
| iii                   | Does the ACTU have effective platforms to interface with other stakeholders and collaborate with external partners? (Such as, CSOs, donors, domestic and international institutions involved in anti-corruption prevention, e.g. ROLAC, UNODC, TUGAR). | 0.5                      | 9.8                  | 0.06                   | 139                                |
| iv                    | Does ACTU have a resource mobilization plan to identify necessary resources required for its activities?   | 0.5                      | 13.7                 | 0.09                   | 132                                |

|              |  |          |      |             |     |
|--------------|--|----------|------|-------------|-----|
| v            | Does ACTU independently contact external partners to secure additional financial, institutional, professional or operational resources to support ACTU activities?                     | 0.5      | 2.9  | 0.02        | 152 |
| vi           | Does ACTU participate in activities of external partners (seminars, training programs, advocacy programs, etc.)?   | 0.5      | 28.7 | 0.18        | 101 |
| vii          | Does ACTU involve external partners to enhance skills of ACTU members?   | 0.25     | 8.5  | 0.05        | 131 |
| vii<br>i     | Do external partners independently reach out to ACTU to assist or request to participate in ACTU activities?   | 0.5      | 7    | 0.04        | 143 |
| iv           | Do external partners independently provide institutional, operational and technical support to ACTU? (Such as advisory, finance, equipment, personnel, programmatic assistance, etc.)? | 0.25     | 3.05 | 0.02        | 148 |
| <b>TOTAL</b> |  | <b>4</b> |      | <b>0.67</b> |     |

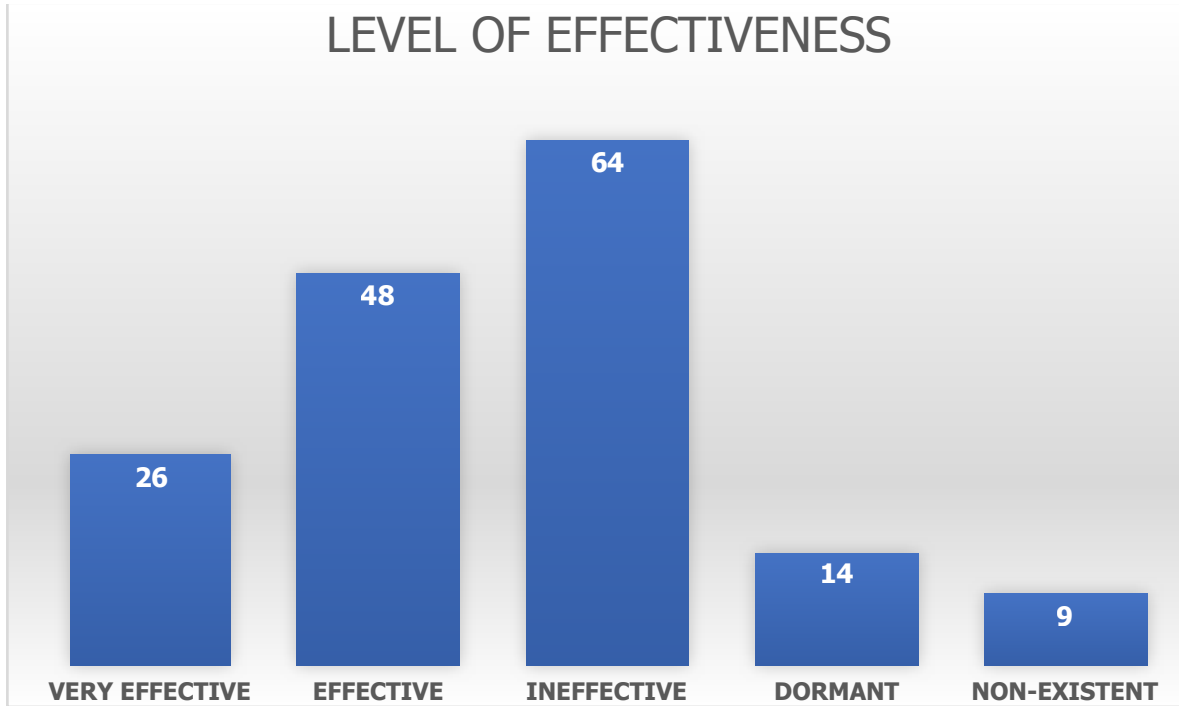
Sustainability is the measure of ACTU capacity to collaborate and relate with other ACTUs, civil societies, partners and others in its area of mandate on anti-corruption programs. In this respect, ACTUs do not collaborate with other agencies, ACTUs do not share knowledge with others through participating in peer reviews, ACTUs do not contact external partners, etc.



**TABLE:10**

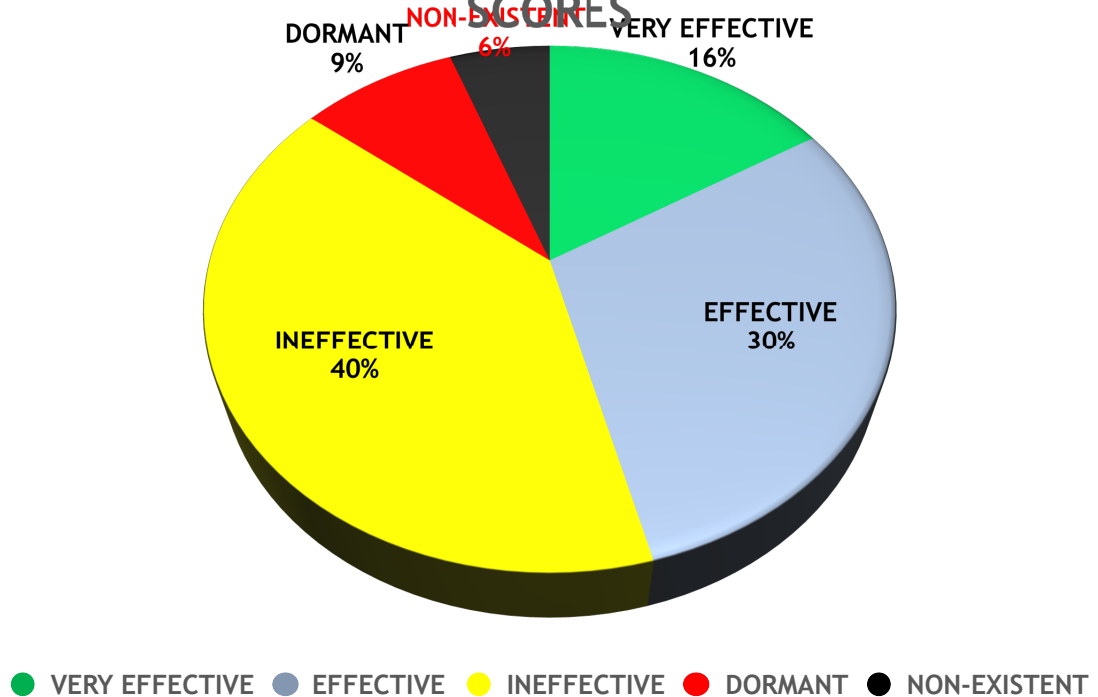
| <b>KEY MEASURING ELEMENTS AND THE ASSIGNED PERCENTAGE</b> |  |                   |                      |
|---|--|-------------------|----------------------|
| <b>S/N</b>  | <b>ELEMENTS OF AEI</b>   | <b>% ALLOTTED</b> | <b>AVERAGE SCORE</b> |
| 1   | COMPOSITION OF THE UNIT MEMBERS                                  | 10                | 7.83                 |
| 2   | INAUGURATION/ INDUCTION  | 6                 | 3.98                 |
| 3   | ACTION PLAN  | 10                | 2.59                 |
| 4   | OFFICE ACCOMODATION AND FACILITIES                               | 10                | 4.09                 |
| 5   | BUDGET AND FUNDING   | 20                | 4.12                 |
| 6   | SUPPORT TO ACTU BY ICPC DESK OFFICER                             | 10                | 7.48                 |
| 7   | ORGANIZATIONAL CONTEXT AND IMPACT ON ACTU CAPACITY/EFFECTIVENESS | 8                 | 3.63                 |
| 8   | OPERATIONS   | 14                | 7.57                 |
| 9   | PROCESS  | 8                 | 2.31                 |
| 10  | SUSTAINABILITY   | 4                 | 0.67                 |
| <b>TOTAL</b>  |  | <b>100</b>        | <b>44.27</b>         |

**FIG. 4**



**FIG. 5**

## LEVEL OF EFFECTIVENESS % SCORES



### 6. FINDINGS

- i. 161 MDAs of 352 MDAs completed and submitted ACTU Effectiveness Index to the Commission.
- ii. 26 ACTUs are Very Effective, representing 16%, 48 are Effective, representing 30%, 64 are Ineffective, representing 40%, 14 are Dormant, representing 9% and 9 are Non-existent, representing 5%.
- iii. ACTUs should be given proper guidance and vetting in the composition of members in line with the Standing Order. The average score is 7.8% of the 10% allotted on composition of members.
- iv. 45 ACTUs were inaugurated without the collaboration of the Commission while 59 ACTUs were not inducted in the MDAs assessed.
- v. 99 ACTUs do not have action plans and ACTU activities are conducted without a management plan.
- vi. Of the 161 ACTUs assessed, 86 ACTUs and 83 ACTUs respectively do not have office accommodation and facilities.

- vii. Budget and funding remain the major problems of ACTUs in MDAs.
- viii. 21 ACTUs do not have desk officers and 18 ACTUs do not have a policy that defines functions and responsibilities of the ACTU Desk Officer (ACTU Standing Order).
- ix. 111 MDAs do not have ACTUs in their structures.
- x. Some ACTUs may not have leveraged on their authority in the Standing Order and do not have the capacity to carry out their responsibility. ACTUs assessed scored an average of 7.57% of the 14% allotted.
- xi. Some ACTUs do not perform their duties effectively as spelt out in the Standing Order. These formed average score of 3.63% of the 8% allotted.
- xii. Many ACTUs do not explore the opportunity to collaborate with other agencies, ICPC and external partners to share knowledge and support as contained in paragraphs 19.1-5 and 25.1-1 (b)(e) of the Standing Order to sustain its activities. This constitute an average score of 0.67% of the 4% allotted.
- xiii. Certain ACTUs do not conduct preliminary investigations, system studies or corruption risk assessments, did not carry out sensitization activities and no budget implementation monitoring activities. These make up 2.31% of the 8% allotted.

## **7. RECOMMENDATIONS**

- i. ACTUs aid accountability and transparency, therefore, the Office of the Secretary to the Government of the Federation (OSGF) and the Office of the Head of Service of the Federation (OHSF) should ensure that Chief Executive Officers of MDAs comply strictly with extant circulars on establishment and operations of ACTUs in the MDAs and the ICPC should heighten effective monitoring and compliance.
- ii. For effectiveness of monitoring ACTUs and their performance, it is important the Commission trains its staff especially the state commissioners and ACTU desk officers, etc, on the ACTU

Standing Order, guiding principles and reporting channels in respect of ACTUs and its activities.

- iii. To ensure compliance and performance enhancement, the Commission should follow up on some key findings such as the issues of budget, funding, office accommodation, facilities, etc.
- iv. Desk officers should be monitored to ensure they act in line with their directives and liaise with ACTUs.
- v. All MDAs should ensure that ACTUs are embedded in the structure of their organisations and channel of ACTU communication properly spelt out either by reporting directly to the CEOs or Directors, Special Duties as the case may be.
- vi. The need for constant training and retraining of ACTU members on their responsibilities while ACAN should liaise with CMED to develop specific training needs for ACTUs and review same as exigency requires. ACAN must ensure that CMED is represented in the training of ACTU members to avoid conflict of information and training.
- vii. The Commission should look into its obligations as contained in paragraph 25 (a) of the Standing Order i.e. 'organize, at least once a year, a joint meeting of the Commission with Ministers, Permanent Secretaries and other relevant personnel to review the performance of the Units to get their buy-in.
- viii. Quarterly peer review programmes should be organised for knowledge sharing and problem solving by the Commission.
- ix. The report and findings with performance rating of each ACTU should be made public to improve activities.
- x. CMED should develop modalities for periodic ACTU visitations in the MDAs as a way of putting ACTUs and even the desk officers on track.
- xi. To encourage efficiency and effectiveness of ACTUs, the Commission should commend and reward high performing ACTUs.

## **8. CONCLUSION**

MDAs must appreciate the crucial role of ACTUs in driving accountability and transparency in their organisations. Therefore, the effectiveness of ACTUs in impacting integrity and performance of the agencies cannot be overstated. The commitments of ACTU members, as well as organizational support to the ACTUs are necessary for ACTU effectiveness.

From the findings, recommendations and expected values that ACTUs contribute, MDAs are expected to ensure the establishment and support of ACTUs in their organizations to discharge their responsibilities in accordance with their stated mandates.

The tool needs periodic reviews to accommodate contemporary realities and changes in systems, procedures and practices. The Commission must continue to strategize and ensure compliance by government establishments, including enforcement for integrity, efficiency and accountability in the MDAs.

## 9.0 APPENDIX (Ranking of ACTUs)

| <b>AEI RANKING</b> |   |               |
|--------------------|---|---------------|
| <b>S/N</b>         | <b>MDA</b>  | <b>SCORES</b> |
| 1                  | UNIVERSITY OF MAIDUGURI TEACHING HOSPITAL, MAIDUGURI, BORNO STATE | 84.45         |
| 2                  | NATIONAL CORRECTIONAL SERVICES                                    | 83.65         |
| 3                  | INDUSTRIAL TRAINING FUND, JOS                                     | 83.25         |
| 4                  | FEDERAL MINISTRY OF INDUSTRY TRADE AND INVESTMENT, ABUJA          | 83.5          |
| 5                  | RAW MATERIALS RESEARCH & DEVELOPMENT COUNCIL, ABUJA               | 81.75         |
| 6                  | FEDERAL INLAND REVENUE SERVICES, ABUJA                            | 81.5          |
| 7                  | NATIONAL OPEN UNIVERSITY OF NIGERIA (NOUN), ABUJA                 | 80.25         |
| 8                  | BUREAU OF PUBLIC ENTERPRISE, ABUJA                                | 79.75         |
| 9                  | KADUNA POLYTECHNIC, KADUNA STATE                                  | 79.5          |
| 10                 | NATIONAL LOTTERY TRUST FUND, ABUJA                                | 78.5          |
| 11                 | FEDERAL POLYTECHNIC ADO EKITI, EKITI STATE                        | 78            |
| 12                 | FEDERAL COLLEGE OF EDUCATION, KANO, KANO STATE                    | 77.5          |

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| 13 | FEDERAL COLLEGE OF EDUCATION(TECHNICAL) BICHI, KANO STATE                          | 75.75 |
| 14 | FEDERAL MINISTRY OF WORKS AND HOUSING, ABUJA                                       | 75.5  |
| 15 | FEDERAL MEDICAL CENTRE, KEFFI, NASARAWA STATE                                      | 75.25 |
| 16 | FCT AREA COUNCIL STAFF PENSION BOARD, ABUJA  | 75    |
| 17 | MINISTRY OF NIGER DELTA AFFAIRS, ABUJA   | 74.5  |
| 18 | OBAFEMI AWOLOWO UNIVERSITY TEACHING HOSPITAL, ILE IFE, OSUN STATE                  | 72.75 |
| 19 | WAZIRI UMARU FEDERAL POLYTECHNIC, BIRNIN KEBBI, KEBBI STATE                        | 72.45 |
| 20 | NIGERIAN METEOROLOGICAL AGENCY, ABUJA  | 72.25 |
| 21 | ALVAN IKOKU FEDERAL COLLEGE OF EDUCATION, OWERRI, IMO STATE                        | 71.75 |
| 22 | JOINT ADMISSION AND MARTRICULATION BOARD, ABUJA                                    | 71.25 |
| 23 | FEDERAL MEDICAL CENTRE, YOLA   | 71    |
| 24 | NATIONAL CEREALS RESEARCH INSTITUTE, BADEGGI, NIGER STATE                          | 70.5  |
| 25 | NIGERIAN ELECTRICITY REGULATORY COMMISSION, ABUJA                                  | 70.5  |
| 26 | BODY OF BENCHERS, ABUJA  | 70.45 |
| 27 | NIGRIAN SHIPPERS COUNCIL, LAGOS  | 68.75 |
| 28 | NATIONAL ENVIRONMENTAL STANDARDS AND REGULATIONS ENFORCEMENT AGENCY(NESREA), ABUJA | 68.25 |
| 29 | REVENUE MOBILIZATION, ALLOCATION AND FISCAL COMMISSION, ABUJA                      | 67.5  |
| 30 | NIGERIAN COMMUNICATION SATELITE, ABUJA   | 66.75 |
| 31 | FEDERAL POLYTECHNIC KAURA NAMODA   | 66.75 |
| 32 | JUDICIAL SERVICE COMMISSION, ABUJA   | 65    |
| 33 | USMANU DANFODIYO TEACHING HOSPITAL, SOKOTO, SOKOTO STATE                           | 63.25 |



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|----|---|-------|
| 34 | NATIONAL TEACHERS INSTITUTE, KADUNA, KADUNA STATE         | 63.25 |
| 35 | NIGERIA DEPOSIT CORPORATION, ABUJA                        | 62.75 |
| 36 | AMINU KANO UNIVERSITY TEACHING HOSPITAL, KANO, KANO STATE | 62.5  |
| 37 | FEDERAL UNIVERSITY OF TECHNOLOGY, OWERRI, IMO STATE       | 62    |
| 38 | NATIONAL PRODUCTIVITY CENTRE, ABUJA                       | 61.5  |
| 39 | NATIONAL ORTHOPEADIC HOSPITAL DALA, KANO STATE            | 60.74 |
| 40 | FEDERAL MEDICAL CENTRE, BIRNIN KEBBI                      | 60.25 |
| 41 | NATIONAL PRIMARY HEALTHCARE DEVELOPMENT AGENCY, ABUJA     | 59    |
| 42 | FEDERAL NEUROPSYCHIATRIC HOSPITAL KWARE, SOKOTO STATE     | 58.7  |
| 43 | ABABAKAR BELLO UNIVERSITY ZARIA, KADUNA STATE             | 58.15 |
| 44 | ABUBAKAR TAFAWA BALEWA UNIVERSITY BAUCHI                  | 58.05 |
| 45 | ABUBAKAR TAFAWA BALEWA UNIVERSITY BAUCHI, BAUCHI STATE    | 58.05 |
| 46 | NIGERIAN COLLEGE OF AVIATION TECHNOLOGY, ZARIA            | 58    |
| 47 | NATIONAL AGRICULTURAL SEEDS COUNCIL, ABUJA                | 57.6  |
| 48 | NATIONAL SALARIES, INCOME&WAGES COMMISSION, ABUJA         | 57.5  |
| 49 | FEDERAL MINISTRY OF HEALTH, ABUJA                         | 56.55 |
| 50 | FISCAL RESPONSIBILITY COMMISSION, ABUJA                   | 56.5  |
| 51 | TERTIARY EDUCATION TRUST FUND, ABUJA                      | 56    |
| 52 | FEDERAL MINISTRY OF SCIENCE AND TECHNOLOGY, ABUJA         | 55.85 |
| 53 | FEDERAL MINISTRY OF EDUCATION, ABUJA                      | 55.75 |
| 54 | UNIVERSITY OF MAIDUGURI, BORNO STATE                      | 55.75 |
| 55 | NATIONAL YOUTH SERVICE CORP, ABUJA                        | 55.5  |

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| 56 | NATIONAL COMMISSION FOR NOMADIC EDUCATION, KADUNA                          | 55.25 |
| 57 | FEDERAL COLLEGE OF EDUCATION (TECHNICAL) GUSAU, ZAMFARA STATE              | 55    |
| 58 | FEDERAL POLYTECHNIC BAUCHI, BAUCHI STATE                                   | 54.75 |
| 59 | PETROLEUM TECHNOLOGY DEVELOPMENT FUND, ABUJA                               | 54.5  |
| 60 | FEDERAL COLLEGE OF AGRICULTURE ABEOKUTA                                    | 54.25 |
| 61 | FEDERAL AIRPORT AUTHORITY OF NIGERIA, LAGOS                                | 54    |
| 62 | FEDERAL MINISTRY OF PETROLEUM RESOURCES, ABUJA                             | 54    |
| 63 | CITIZENSHIP AND LEADERSHIP TRAINING CENTRE, ABUJA                          | 52.75 |
| 64 | NATIONAL PARK SERVICES, ABUJA  | 52.5  |
| 65 | MINISTRY OF LABOUR & EMPLOYMENT, ABUJA                                     | 52.25 |
| 66 | NATIONAL PENSION COMMISSION, ABUJA   | 52.25 |
| 67 | FEDERAL MEDICAL CENTRE GUSAU, ZAMFARA STATE                                | 52    |
| 68 | FEDERAL MINISTRY OF ENVIRONMENT, ABUJA                                     | 52    |
| 69 | FEDERAL MINISTRY OF JUSTICE, ABUJA   | 51.05 |
| 70 | NIGERIA COMMUNICATION COMMISSION, ABUJA                                    | 50.75 |
| 71 | NATIONAL INSTITUTE FOR POLICY AND STRATEGY STUDIES, KURU-JOS               | 50.5  |
| 72 | AGRICULTURAL RESEARCH COUNCIL OF NIGERIA ABUJA                             | 50.25 |
| 73 | SMALL AND MEDIUM ENTERPRISES DEVELOPMENT AGENCY OF NIGERIA, ABUJA          | 50.25 |
| 74 | NATIONAL ORTHOPAEDIC HOSPITAL DALA, KANO STATE                             | 50.02 |
| 75 | NATIONAL COMMISSION FOR MASS LITERACY, ADULT & NON-FORMAL EDUCATION, ABUJA | 49.75 |
| 76 | FEDERAL UNIVERSITY LOKOJA, KOGI STATE                                      | 49.25 |
| 77 | NATIONAL OFFICE FOR TECHNOLOGY ACQUISITION AND PROMOTION, ABUJA            | 48.75 |
| 78 | MODIBBO ADAMA UNIVERSITY OF TECHNOLOGY, YOLA                               | 48.75 |
| 79 | CORPORATE AFFAIRS COMMISSION, ABUJA  | 48.5  |

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| 80  | FEDERAL COLLEGE OF EDUCATION OKENE, KOGI STATE                        | 48    |
| 81  | NNAMDI AZIKIWE UNIVERSITY TEACHING HOSPITAL,<br>NNEWI, ANAMBRA STATE. | 47    |
| 82  | FEDERAL COLLEGE OF EDUCATION, YOLA, ADAMAWA STATE                     | 47    |
| 83  | NIGERIAN COPYRIGHT COMMISSION, ABUJA                                  | 46.75 |
| 84  | NATIONAL FILM AND VIDEOS CENSORS BOARD, ABUJA                         | 46.25 |
| 85  | NATIONAL CENTRE FOR TECHNOLOGY MANAGEMENT ILE<br>IFE, OSUN STATE      | 45.8  |
| 86  | NATIONAL CENTRE FOR AGRICULTURAL MECHANIZATION<br>ILORIN, KWARA STATE | 45.75 |
| 87  | CHAD BASIN DEVELOPMENT AUTHORITY                                      | 44.25 |
| 88  | MINISTRY OF MINES AND STEEL DEVELOPMENT, ABUJA                        | 44.09 |
| 89  | PENSION TRANSITIONAL ARRANGEMENT DIRECTORATE<br>ABUJA                 | 43    |
| 90  | FEDERAL UNIVERSITY OF AGRICULTURE, MAKURDI,<br>BENUE STATE            | 42.75 |
| 91  | NATIONAL EXAMINATION COUNCIL, ABUJA                                   | 42.75 |
| 92  | RADIOGRAPHERS REGISTRATION BOARD OF NIGERIA,<br>ABUJA                 | 42.5  |
| 93  | FEDERAL MINISTRY OF WATER RESOURCES, ABUJA                            | 42.5  |
| 94  | NATIONAL ROOT CROPS RESEARCH INSTITUTE UMUDIKE,<br>ABIA STATE         | 41.5  |
| 95  | RURAL ELECTRIFICATION AGENCY, ABUJA                                   | 41.05 |
| 96  | NATIONAL LOTTERY REGULATORY COMMISSION, ABUJA                         | 40.75 |
| 97  | NIGERIAN BUILDING AND ROAD RESEARCH INSTITUTE,<br>ABUJA               | 40.25 |
| 98  | NIGERIAN EXPORT-IMPORT BANK (MEXIM), ABUJA                            | 39.21 |
| 99  | NIGERIA BULK ELECTRICITY TRADING LTD, ABUJA                           | 38.5  |
| 100 | NATIONAL EAR CARE CENTRE, KADUNA                                      | 37.5  |
| 101 | FEDERAL HOUSING AUTHORITY, ABUJA                                      | 37.15 |
| 102 | FEDERAL POLYTECHNIC IDAH, KOGI STATE                                  | 37    |

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| 103 | FEDERAL MEDICAL CENTRE YENAGOA, BAYELSA STATE                                  | 36.75 |
| 104 | NATIONAL WATER RESOURCES INSTITUTE, KADUNA                                     | 35.25 |
| 105 | FEDERAL NEUROPSYCHIATRIC HOSPITAL, BENIN, EDO STATE                            | 35.2  |
| 106 | NATIONAL GALLERY OF ART ABUJA  | 35    |
| 107 | FEDERAL MINISTRY OF DEFENCE, ABUJA   | 34.9  |
| 108 | NATIONAL METALLURGICAL DEVELOPMENT CENTRE, JOS                                 | 34.25 |
| 109 | BANK OF AGRICULTURE  | 34.25 |
| 110 | FEDERAL POLY ILARO, OGUN STATE   | 34    |
| 111 | NIGERIAN TELEVISION AUTHORITY, ABUJA   | 33.85 |
| 112 | ENERGY COMMISSION OF NIGERIA   | 33.5  |
| 113 | LOWER BENUE RIVER BASIN DEVELOPMENT AUTHORITY, MAKURDI, BENUE STATE            | 33.25 |
| 114 | FEDERAL COMPETITION AND CONSUMER PROTECTION COMMISSION, ABUJA                  | 33.25 |
| 115 | NIGERIA TOURISM DEVELOPMENT CORPORATION, ABUJA                                 | 32.25 |
| 116 | SECURITIES AND EXCHANGE COMMISSION, ABUJA                                      | 31.75 |
| 117 | STANDARDS ORGANISATION OF NIGERIA  | 31.75 |
| 118 | COCOA RESEARCH INSTITUTE OF NIGERIA, IBADAN, OYO STATE                         | 31.25 |
| 119 | NIGER DELTA DEVELOPMENT COMMISSION PORTHARCOURT, RIVERS STATE                  | 30.75 |
| 120 | FEDERAL MINISTRY OF FOREIGN AFFAIRS, ABUJA                                     | 30.5  |
| 121 | INVESTMENT AND SECURITIES TRIBUNAL   | 30.5  |
| 122 | AFRICAN REGIONAL CENTRE FOR SPACE SCIENCE AND TECH EDUCATION- ENGLISH- ILE IFE | 29    |
| 123 | NIGERIA STORED PRODUCTS RESEARCH INSTITUTE, ILORIN, KWARA STATE                | 28.95 |
| 124 | FEDERAL FIRE SERVICE ABUJA   | 28.8  |
| 125 | FEDERAL MINISTRY OF YOUTH AND SPORTS, ABUJA                                    | 28.25 |

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| 126 | UNIVERSITY OF ILORIN TEACHING HOSPITAL, ILORIN, KWARA STATE         | 28    |
| 127 | OBAFEMI AWOLOWO UNIVERSITY ILE IFE, OSUN STATE                      | 27.75 |
| 128 | VOICE OF NIGERIA, ABUJA   | 26    |
| 129 | ADMINISTRATIVE STAFF COLLEGE OF NIGERIA, LAGOS                      | 23.75 |
| 130 | FEDERAL NEUROPSYCHIATRIC HOSPITAL CALABAR, CROSS RIVER STATE        | 22.25 |
| 131 | NATIONAL EMERGENCY MANAGEMENT AGENCY (NEMA)                         | 20.25 |
| 132 | UNIVERSITY OF CALABAR TEACHING HOSPITAL, CALABAR, CROSS RIVER STATE | 19.5  |
| 133 | NIGERIAN FILM CORPORATION, ABUJA                                    | 18    |
| 134 | UNIVERSITY OF BENIN TEACHING HOSPITAL, BENIN, EDO STATE             | 15    |
| 135 | FEDERAL MEDICAL CENTRE  | 14.5  |
| 136 | FEDERAL MEDICAL CENTRE, MAKURDI, BENUE STATE                        | 14    |
| 137 | FEDERAL POLYTECHNIC NASARAWA, NASARAWA STATE                        | 11.5  |
| 138 | FEDERAL MEDICAL CENTRE, NGURU                                       | 11    |
| 139 | PROJECTS DEVELOPMENT INSTITUTE ENUGU, ENUGU STATE                   | 10    |
| 140 | COUNCIL FOR LEGAL EDUCATION, ABUJA                                  | 10    |
| 141 | NATIONAL INFORMATION TECHNOLOGY DEVELOPMENT AGENCY, ABUJA.          | 9.25  |
| 142 | NATIONAL DIRECTORATE OF EMPLOYMENT, ABUJA                           | 9     |
| 143 | FEDERAL COLLEGE OF EDUCATION (T) UMUNZE, ANAMBRA STATE              | 8.75  |
| 144 | FEDERAL MINISTRY OF POWER   | 8     |
| 145 | NIGERIAN SECURITY AND CIVIL DEFENCE CORPS, ABUJA                    | 8     |
| 146 | NATIONAL HEALTH INSURANCE SCHEME                                    | 8     |
| 147 | NATIONAL HAJJ COMMISSION OF NIGERIA, ABUJA                          | 7.75  |
| 148 | OFFICE OF THE HEAD OF THE CIVIL SERVICE OF THE FEDERATION ABUJA     | 7     |

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| 149 | NATIONAL BOARD FOR TECHNICAL INCUBATION, ABUJA                                | 5    |
| 150 | RUBBER RESEARCH INSTITUTE OF NIGERIA, BENIN, EDO STATE                        | 3.8  |
| 151 | NIGERIAN ELECTRICITY MANAGEMENT SERVICE AGENCY, ABUJA                         | 3.75 |
| 152 | PETROLEUM PRODUCTS PRICING REGULATORY AGENCY, ABUJA                           | 3    |
| 153 | BORDER COMMUNITY DEVELOPMENT AGENCY, ABUJA                                    | 0    |
| 154 | VETERINARY COUNCIL OF NIGERIA   | 0    |
| 155 | ENVIRONMENTAL HEALTH OFFICERS REGISTRATION COUNCIL OF NIGERIA                 | 0    |
| 156 | NATIONAL AGENCY FOR THE PROHIBITION OF TRAFFICKING IN PERSONS (NAPTIP), ABUJA | 0    |
| 157 | NIGERIAN GEOLOGICAL SURVEY AGENCY, ABUJA                                      | 0    |
| 158 | NEWS AGENCY OF NIGERIA, ABUJA   | 0    |
| 159 | FEDERAL POLYTECHNIC MUBI, ADAMAWA STATE                                       | 0    |
| 160 | FEDERAL MINISTRY OF AVIATION, ABUJA   | 0    |
| 161 | NATIONAL AGENCY FOR THE GREAT GREEN WALL                                      | 0    |