

UNDERSTANDING THE NATURE OF CORRUPTION



2015

TRAINING MANUAL

NATIONAL ANTI CORRUPTION VOLUNTEER CORPS

CONTACT:

For Further Enquiries Please

The National Coordinator ICPC Headquarters Plot 802 Constitution Avenue, Central Business District, Abuja, FCT navc@icpc.gov.ng website: www.icpc.gov.ng

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UNDERSTANDING THE NATURE OF CORRUPTION

OBJECTIVES

- To provide an understanding of what constitute corruption;
- To examine the moral/legal issues involved;
- To disseminate why and how to fight corruption;
- Emphasise the extent to which individuals ought to resist engaging in corruption and what is expected of an individual to combat it.

Facilitator to ask trainees what they understand by Corruption. Can they explain that?

There is no single, comprehensive, universally accepted definition of corruption. Corruption defies precise definition. Any attempt to precisely define it excludes some corrupt practices.

The inclusive and integral nature of corruption derives from its Latin root "Corrumpere", which means to break in pieces, destroy, ruin, spoil, mar, adulterate, falsify, draw to evil, seduce, bribe, etc.

The word corruption means something spoiled; something that has pushed off course into a worse or inferior form, an adverse departure from an expected course.

When applied to human relations, corruption is a bad influence, an injection or rottenness or decay, a decline in moral conduct and personal integrity attributable to dishonesty.

When applied to public office rather than referring to departure from ideal or even generally expected standard of incumbent behaviour, it spells out specific acts of misconduct that bring disgrace to public office and makes the offenders unfit to remain there.

Here are some of the attempted definitions of the concept:-

a) Dishonest, illegal or immoral behaviour, especially from someone



with power - Longman's Dictionary of Contemporary English;

- b) "The abuse of public office for private gain" World Bank. This definition tends to link corruption to the state, its activities and the existence of the public sector. In other words, the use of this definition excludes the possibility of corruption in the private sector and it focuses exclusively on corruption in the public sector. This definition, though criticised, as being narrow in concept is consistent with the beliefs of the Nobel laureate, Gary Becker that "if we abolish the state, we abolish corruption" (Belgovic).
- c) "The behaviours on the party of the officials in the public and private sectors, in which they improperly and unlawfully enrich themselves and/or induce others to do so, by misusing the position in which they are placed" Asian Development Bank.
- d) "Corruption equals monopoly plus discretion minus accountability" Robert Klitgaard.

In conclusion, it is the abuse of entrusted power for private gain. The abuse may be perpetrated by a person with decision-making power in the public or private sectors may be initiated by that person or induced by a person attempting to influence the decision-making process.

Corruption is a manifestation of institutional weaknesses, poor ethical standards, skewed incentives and insufficient enforcement. Corrupt behaviour creates illicit benefits for a person or group by enabling them to circumvent rules designed to ensure fairness and efficiency. It produces unfair, inefficient and wasteful outcomes. The illicit rewards for a small rule-breaking group come at the expense of the community at large. There are also individual losers such as those forced into making extortion payments, those who are barred from entitlements because they are unable to make such payments and those who lose bidding competitions to supply goods or services due to bribes paid by less ethical peers.



Other associated offences relating directly or indirectly to corruption are, laundering of the proceeds of corruption a key part of the corruption equation as well as aiding corruption and obstruction justice.

Corruption abounds and resounds in almost every country. Let us point out some of the corrupt practices in Nigeria:

- Demand for and obtaining some percentages of contract sums usually 10 percent of contract awarded by a public officer acting on behalf of government. This percentage is normally paid in kind or cash in a designated bank account of the official at home or abroad. In this way, government is defrauded of the amount involved and the treasury is systematically looted by the public officers who are supposed to secure it. Normally the contractor inflates the cost of the contract by the percentages demanded by the official.
- b) Fraud by deceit typically referred to as 419. It may start with a target (mostly a foreigner living abroad) receiving an unexpected letter from a Nigerian dupe proposing some business in Nigeria. The kind of business they propose are unlimited: it could be supply, construction, transfer of money from Nigeria resulting from over-invoiced or double invoiced petroleum business. If the target swallows the bait and accepts the proposal, he is asked to provide an account abroad into which the money running into upward of \$20 million could be paid.
- c) Employment and placement of less qualified individuals over and above qualified or more experienced others mostly due to gratification.
- d) Sexual harassment and award of marks by teachers in consideration for gratification.
- e) Unwarranted exploitation of one's public office to



inordinately enrich oneself.

- f) Misappropriation of public funds on worthless projects.
- g) Certificate racketeering at the examination boards; issuing certificates to candidates who did not sit for the examinations.
- h) The bank manager who lends the bank's money without security; aids and abets financial fraud.
- i) Marketing and distribution of fake, counterfeit, and expired drugs and other consumer goods.
- j) Selling goods at unjust price, using unjust measures.
- k) Police offering protection to a prostitution racket or robbery gang etc.
- 1) Arbitrariness and abuse of due process in decision-making.
- m) Influential person who uses his wealth and influence to buy people's conscience or use threat to intimidate, repress or assault people who refuse to sell theirs.
- n) Favouritism and nepotism in promotion exercises.
- o) Influencing the admission process for ones' associates and cronies.
- p) Bribing a court official to get favourable considerations, trial and judgement.
- q) A company paying a politician to favourably influence its interest at the legislative or executive level.



The list is inexhaustible but what we have listed above is representative enough to cover wide instances of corruption in Nigeria.

NATURE OF CORRUPTION

Facilitator to explain that corruption:

- · Involves dishonesty and unjust act to at least one person.
- Usually secretive and concealed; it thrives under lack of transparency.
- · Not necessarily pecuniary, may not be criminal.
- Involves conflict of interest (usually Official vs. Self or Group interest).
- Could be grand or petty. Petty corruption is more widespread and responsible for most of our image problems.
- It is in major part attitudinal, which means that integrity or lack of it can be learnt or unlearned i.e. WE CAN ALL DO SOMETHING ABOUT CORRUPTION.

FORMS OF CORRUPTION

The United Nations Office on Drug and Crimes (UNODC) identified some specified forms of corruption to include:

"Grand and Petty Corruption"

Grand corruption is corruption that pervades the highest levels of a national government, leading to a broad erosion of confidence in governance, the rule of law and economic stability. Petty corruption on the other hand can involve the exchange of very small amount of money, the granting of minor favours by those seeking preferential treatment or the employment of friend(s) or relation(s) in minor positions.

"Active and Passive Corruption"

In transactional offences such as bribery, "active bribery" usually refers to the offering or paying of the bribe, while passive bribe" refers to the



receiving of the bribe. UNODC describes "Active Corruption to include all cases where payment and/or acceptance of a bribe had taken place. It does not include cases where a bribe was offered but not accepted, or solicited but not paid.

Bribery

Bribery is the bestowing of a benefit in order to unduly influence an action or decision. It can be initiated by a person who seeks or solicits bribes or by a person who offers and then pays bribes. Bribery is probably the most common form of corruption known.

The "benefit" in bribery can be virtually an inducement: money and valuables, company shares, inside information, sexual or other favours, entertainment, employment or, indeed, the mere promise of incentives. The benefits may be passed directly or indirectly to the person bribed, or to a third part, such as a friend, relative, associate, favourite charity, private business, political party or election campaign. The conduct for which the bribes are paid can be active; the exertion of administration or political influence, or it can be passive; the overlooking of some offences or obligation. Bribes can be paid individually on a case by case basis or as part of a continuing relationship in which officials receive regular benefits in exchange for regular favours.

Some specific types of bribes identified by UNODC include:

- " Influence peddling.
- Offering or receiving improper gifts, gratitude, favours or commissions.
- " Bribery to influence posting to places of choice.
- Bribery in support of unfair competition of benefits or resources.
- Private sector bribery. Corrupt bank officials are bribed to approve loans that do not meet basic security criteria and cannot later be collected.
- "Bribery to obtain confidential or "inside" information.
- " Bribery of national public sector officials.
- " Bribery of foreign public sector officials.



to

- "Bribery of officials of public international organizations (UN only).
- "Bribery of private sector decision-makers (UN optional, AU mandatory).
- "Illicit enrichment by a public official (UN optional, AU mandatory "subject to domestic law") defined in UN Convention as 'a significant increase in the assets of a public official that he or she cannot reasonably explain in relation to his or her lawful income'.
- "Trading in influence (UN optional, AU mandatory "subject to domestic law") involving bribery of a public official in order capitalize on his or her influence in a public institution.
 - Abuse of functions (UN optional) involving bribery of a public official to induce the performance of an unlawful act.

*Facilitator to refer learners to offences created under the ICPC Act 2000

as	S/N	OFFENCES		
	1	ACCEPTING GRATIFICATION		
Ī	2	GIVING OR ACCEPTING GRATIFICATION THROUGH AN		
		AGENT		
	3	ACCEPTOR OR GIVER OF GRATIFICATION ARE BOTH GUILTY		
		OF THE OFFENCE		
	4	COUNSELLING OFFENCES RELATING TO CORRUPTION		
	5	FRAUDULENT ACQUISITION OF PROPERTY		
	6	FRAUDULENT RECEIPT OF PROPERTY		
	7	PENALTY FOR OFFENCES COMMITTED THROUGH POSTAL		
		SYSTEM		
	8	DELIBERATE FRUSTRATING OF INVESTIGATION BY THE		
		COMMISSION		
	9	MAKING FALSE STATEMENT		
	10	GRATIFICATION BY AND THROUGH AGENT		
	11	BRIBERY OF PUBLIC OFFICER		
	12	BRIBERY OF PUBLIC OFFICER USING OFFICE OPPOSITION FOR		
		GRATIFICATION		
	13	FORFEITURE OF GRATIFICATION AND OTHER PENALTIES		
	14	BRIBERY IN RELATION TO AUCTIONS		
	15	BRIBERY FOR GIVING ASSISTANCE IN REGARDS TO		
		CONTRACTS		
	16	DUTY TO REPORT BRIBERY TRANSACTIONS		
	17 DEALING WITH PROPERTY ACQUIRED THROUGH			
		GRATIFICATION		
	18	MAKING FALSE OR MISLEADING STATEMENT TO THE ICPC		
	19	ATTEMPT, CONSPIRACY PUNISHABLE AS OFFENCES		



Extortion

Whereas bribery involves the use of payments or other positive incentives, extortion relies on coercion, such as the use of threat of violence or blackmail through the exposure of damaging information, to induce cooperation. As with other forms of corruption, "the victim" can be the public interest or individual, adversely affected by a corrupt act or decision. In extortion cases, however, a further "victim" is created, namely the person who is coerced into co-operation.

Abuse of discretion

In some cases, corruption can involve the abuse of discretion vested in an individual, for personal gain. For example, an official responsible for government contracting may exercise the discretion to purchase goods or services from a company in which he or she holds a personal interest or propose real estate developments that will increase the value of his own personal property. Such abuse is often associated with bureaucracies where there is broad individual discretion and few accountability structures.

Favouritism, Nepotism and Clientelism

Generally, favouritism, nepotism and clientelism involve abuse of discretion. Such abuses, however, are governed not by the self-interest of an official but the needs of someone linked to him or her through membership of a family, political party, tribe, religion or other group. If a corrupt official hires a relative, he or she acts in exchange for the less tangible benefit of advancing the interests of family or the specific relation involved (nepotism). The favouring of, or discriminating against, individuals can be based on a wide range of group characteristics: race, religion, geographical factors, political or other affiliations, as well as personal or organizational relationships, such as friendship or membership of clubs or associations.

Embezzlement, theft and fraud

In the context of corruption, embezzlement, theft and fraud involves the



taking r conversion of money, property or valuable items by an individual who is not entitled to them, but, by virtue of his or her position or employment, has access to them (UNODC). In the case of embezzlement and theft, the property is taken by someone to whom it is entrusted. Fraud, however, consist of the use of false or misleading information to induce the owner of the property to relinquish it voluntarily. For example, an official who takes and sells part of a relief donation or a shipment of food or medical supplies would be committing theft or embezzlement; an official who induces an aid agency to oversupply aid by misrepresenting the number of people in need of it is committing fraud.

Embezzlement, misappropriation or other diversion of entrusted property by a public official.

Embezzlement by persons working in private sector entities (UN optional, AU mandatory).

Improper political contributions

There is a distinction between legitimate contributions to political organizations and payment made in an attempt to unduly influence present or future activities by a party or its members once they are in power. A decision made because the donor supports the party and wishes to increase its chances of being elected is not corrupt; it may be an important part of the political activity protected by the constitution. A donation made with the intention or expectation that the party will, once in office, favour the interests of the donor over the interests of the public is tantamount to the payment of bribe (United Nations Office on Drugs and Crimes, UNODC).

FURTHER EXPLORATORY DISCUSSION OF WHAT AND WHERE CORRUPTION IS.

FACILITATOR TO ASK: are there differences of opinion regarding what constitutes corruption or is it acceptable behaviour in your locality? In answering, facilitator to guide discussion by emphasizing the three points below:-



- Was dishonesty involved:
- Was there injustice:
- ➤ Could it fit into legal instance of corruption identified?

Class may look at some spheres of life (especially public) and examine the presence and types of corrupt activities therein.

CORRUPTION IS A CROSS-BORDER PROBLEM

Bribe payments are often arranged and made across borders. The proceeds of corruption are concealed by laundering funds across borders. (This may be done via deposits in foreign banks, through cross-border acquisitions or by transferring funds to anonymous shell companies or trusts in haven jurisdictions). Individuals involved in corruption can often escape law enforcement efforts by leaving the country where investigations or prosecutions are taking place or where a court judgment has been handed down.

EFFECT OF CORRUPTION

Facilitator should guide learners to discuss how corruption has affected them individually, and then explain as follows:

Corruption has impacted negatively on Nigeria in a number of interrelated ways.

- a) The first casualty of corruption is trust and confident living (Mbaeri, 2001). Daily interpersonal relationships in social, economic, and political lives are carried on upon the foundations of trust and confidence reposed on one another. Corruption erodes these values.
- b) It debases and disreputes personal integrity. It therefore breeds mutual suspicion and in turn, makes daily living precarious and stressful.
- c) Corruption undermines the demands of transparency, accountability and performance in public life.
- d) Corruption is antithetical to development. It stunts growth.



Nigeria continues to be regarded as the sleeping giant of Africa, in spite of its immense human and material resources. It promotes widespread poverty and large-scale unemployment.

- e) It brings about capital flight thereby putting the country in financial straits. It denies the country needed fund for development projects.
- f) Corruption puts a stigma of shame on the international face of the country; consequently, Nigeria is treated as a pariah state. It destroys ethical and democratic values.
- g) Promotes inefficiency, incompetence and breeds nepotism or unhealthy rivalry in the administration of government.
- h) Weakness of general performance: the spread of corruption weakens the administrative and organizational structure of the state.
- I Corruption is a threat to National Security, because it breeds all forms of vice ranging from petty theft to complicated forms of theft.

Nations, economy and people suffer the negative effects of corruption in many ways like:

- Poor and inadequate infrastructure
- Mass poverty
- Huge unemployment and underemployment
- Youth restiveness
- High cost of living
- High levels of crime and criminality
- False societal values
- Low levels of industrial capacity
- Widening gap between the rich and the poor
- Brain drain
- Encourages police brutality and general indiscipline



The effects of corruption on public institutions are multifarious and they include:

- Indiscipline in the work place
- Low or declining productivity
- Dwindling employment opportunities
- Job insecurity
- Low public esteem
- Indolence at the work place
- Unhealthy and acrimonious relationship among workers
- Lack of job satisfaction
- Absence or lack of clearly defined job schedules, rules, processes and procedures

CAUSES OF CORRUPTION

- 1. Low wages in public service relative to wages and perks in private sector.
- 2. Bureaucratic control over business and industry through licensing, quota, foreign exchange, monopolistic and restrictive trade policies, company laws, etc.
- 3. Lack of self-control which is manifested in many ways:
 - · Luxury living beyond means
 - · Lack of faith and moral values
 - Greed for wealth and position
 - Borrowing money and spendthrift
 - · Backsliding in religious faith, moral values and ethics
- 4. Weakness of internal control mechanism within the departments which is manifested in many ways:
 - · Weak leadership and supervision
 - Lack of transparency
 - Delayed service
 - · Use of discretion without limit and control
 - · Non-existence of channel and monitoring system of public complaints



- Lack of publicity on services of the department
- 5. Personal motivations in corruption include:
 - a) People offer bribes because they want an unfair advantage over others.
 - b) People seek bribes for several reasons that are special to them. For example:-
 - Politicians seek money to use for patronage and recognition
 - Politicians and officials who fear loss of office seek corrupt benefits as "insurance" especially if they expect no benefits
 - Officials need extra money to maintain their standard of living if salaries have not been raised to match inflation to meet commitments for housing, car, school fees etc
- 6. Another cause of corruption is bad incentives, such that a clerk who is not earning enough to live on is "forced" to supplement his income with bribes
- 7. Corruption flourishes in any social or political setting where there are over centralisation of political and economic decision-making process
- 8. Corruption flourishes in societies that lack well developed and sophisticated social control mechanisms for the detection and deterrence of corrupt practices.

WHY FIGHT CORRUPTION

Corruption poses a serious threat 'to the stability and security of societies undermining the institutions and values of democracy, ethical values and justice and jeopardising sustainable development and the rule of law.' When corruption is widespread in a country, people throughout society, from business people to school teachers to hospital patients feel the adverse affects in different ways.



Corruption causes poverty and creates barriers to overcoming it. Corruption violates human rights. Corruption undermines representative democracy. Corruption is a barrier to economic development. Corruption is a cause of environmental damage. Corruption is a tool of organized crime.

Facilitator then explains that corruption must be countered in order;

- 1) To restore the damaged state credibility and organizational reputation.
- 2) To ensure transparency, accountability in public life.
- 3) To check capital flight and attract foreign investment.
- 4) To enhance national development.
- 5) To improve the standard of living of the people.

HOW CAN CORRUPTION BE COUNTERED?

- Corruption can be countered by the introduction or strengthening of preventive and punitive measures and by enhancing international cooperation.
- By establishing specialized bodies and persons for anti-corruption law enforcement. Apart from the national law to control corruption such as the Independent Corrupt Practices and Other Related Offences Act 2000, the AU and UN Conventions are among the most recent international conventions against corruption, both having been adopted in 2003.
- By ensuring accountable, efficient and effective public office holders and civil servants through certain provisions in the constitution and other laws and regulations. These may include code of conduct for public office holders or a citizens' charter or any other measures for enhancing integrity and probity in public life.
- By actively fighting corruption in the public sphere through independent and effective institutions mechanisms, and processes.
 Precedents for dealing effectively with proven cases of corruption are very important.
- What is the overall assessment of the level of corruption in the country?



- Proceedings of Parliament and the reports of its various committees must be accessible to the public.
- Requirements for periodic declaration of assets by public office bearers and senior public officials.
- Protection of witnesses, experts, victims, persons reporting corruption.
- Compensation for damages.

PREVENTIVE MEASURES AGAINST CORRUPTION

- Institutionalization of Anti-corruption policies and practices in public establishments.
- Establishing preventive anti-corruption unit or section within organizations to promote internal monitoring/cleansing.
- Institutionalize public sector ethics and procedures.
- Public procurement must be procedural and integrity driven.
- Transparent public sector finance-budgeting and monitoring.
- Promotion of public reporting access to information and whistleblower protection.
- Intensive/extensive anti-corruption/integrity education and public enlightenment.
- Active promotion of private sector integrity standards, including accounting and auditing standards.

PUNITIVE MEASURES TO COUNTER CORRUPTION

Sanctions against criminal corruption include jail terms, fine etc. other punitive but administrative measures are

- Suspension or reassignment of public officials.
- Disqualification of persons from holding public offices for a period of time.
- Freezing seizure and confiscation of proceed/assets obtained through corruption offences.

OTHER MEASURES

- Asset recovery (supported by UN and AU conventions).
- Technical assistance (UN).
- Mechanisms for implementation (UN and AU).



WHAT CAN THE INDIVIDUAL DO (EXPECTED TO)?

- Shun corruption through practice of integrity, deal fairly/justly.
- Give personal resistance even when there are opportunities to engage in corruption.
- Practice integrity, seek to right injustice through none violent means.
- Spread the consciousness unto others, share the message.
- Monitor integrity through constant vigilance and by reporting corruption to appropriate agencies.

**Facilitator to highlight Table 1b) in order to show other forms and examples of corruption that volunteers could monitor

To avoid having to visit the police station and pay full fine, a traffic offender offers to pay directly to the traffic policeman. The policeman did not ask for the money but accepted it.	Someone visits a government office and receives good assistance from the officer in charge. When the matter is concluded he offers 100 Naira which the official accepts.
Someone needs service from a government department. The official deliberately takes his time. The person gives the official money (N300 – N500) to speed up the work and reward the official for effort.	A government official uses an official car and petrol for personal affairs.
A businessman gives a commission fee to a government department or official looking after a project.	A high ranking military officer receives a commission fee on arms purchases.
Someone makes a secret payment to a minister	A person is promoted because he or she is a blood relation or friend of a senior officer or minister
A government official goes to work late, returns home early and uses an official house for private affairs	A government off icial pays money to an agent or higher official in order to get promotion



EXERCISES FOR DISCUSSION

Facilitator to obtain responses of trainees concerning any of the following spurious statements:

- Who demands gratification is wrong, but the policeman who extorts money from commercial drivers hurts nobody in particular.
- Parents are entitled to spend their money to ensure that their children secure college admission.
- Public officials that enjoy indecent standard of living due to poor remuneration are justified not to honour their public service code of conduct.
- If all my colleagues are making it by cutting corners, it is unfair if I do not.
- Students offered the chance to view exam questions in advance for a small sum should rejoice.
- Everybody knows about two children who consistently receive high marks from home works they are known not to have done by themselves, why must I bother my head.
- You are given too much change when paying for your school meal.
- You see your friend stealing coloured paper from the school's stationery store.
- How would the class feel as a group, if they made a pact to engage in corruption and one of them broke the pact? What will happen if everyone refused to pay bribes to public officials and/or if all public officials refused to take bribes?

ROLE PLAY: Facilitator to choose either role-play or class discussion. Mrs. Kafaru was a victim of medical negligence and corruption that left her child and the expected grandchild dead at childbirth in a general hospital. The doctor on duty had demanded five thousand naira for delivery and had left the patient unattended to because Mrs. Kafaru could not pay. The pregnant woman was taken to a nearby local health facility when it was already too late and she eventually died. Expected to resign to fate, Mrs. Kafaru vowed to do everything possible to get redress.



TRAINEES CAN ALSO ACT THE FOLLOWING ROLES

- 1) Two women; one to give birth to a child having paid bribe, the other to lose her child for inability to pay up the bribe. Dialogue to focus on possible remedies for the latter person.
- 2) A doctor who refused to take bribe and a hospital administrator who looked the other way when bribery/gratification is being practiced. Dialogue to focus on motivation for such actions.

In summing up, facilitator to emphasize that corruption:

- i. Harms people especially the poor; it harms the society.
- ii. Is unconducive to economic development.
- iii. Is illegal and impinges on human rights.
- iv. It is everywhere but can be fought.

That certain legislations already exist and more are still necessary e.g. Freedom of Information (FOI) and Fiscal Responsibility Laws.

Code of Conduct for Volunteers

- a) Compliance volunteers must comply with applicable federal, state and local government laws and regulations and with the NAVC guidelines.
- b) Name, Emblem, Endorsement, Services or Property of the ICPC or NAVC volunteers shall not put any of these into personal or group use in any way inimical to the integrity of the bodies, therefore, no volunteer shall be permitted to print letterheads, complimentary cards and/or sign posts.
- c) The NAVC Secretariat only shall design letterhead for the EXCO.
- d) Volunteers shall not act in any manner that is contrary to the best interests of the NAVC.
- e) Volunteers shall not seek for funds on behalf of the NAVC, or any other person/group affiliated with it. Any voluntary contribution



must be paid into the Commission's Integrity Funds Account.

- f) Volunteer shall not engage in formal investigation of any corruption case that may otherwise come to their knowledge. However, they shall without delay, perform whistle-blowing function through open communication of concerns over misappropriation, waste, abuse, fraud, illegal/unsafe/unethical conducts or any other corruption-related misconduct by public officials to ICPC.
- g) Conflict of Interest volunteer with personal, business or financial interests that appear to conflict with the aims and objectives of NAVC shall declare such. Any deviation from this shall be met with appropriate sanctions.
- h) Uniforms NAVC is not a paramilitary outfit; therefore, volunteers MUST NOT militarise it. T-shirts/fez caps and jackets are the only approved uniform for the NAVC. These are to be worn on navy blue trousers/skirts with ordinary black shoes. No military-style boots are permitted.
- i) Before observing any event, volunteers must, first and foremost, write and obtain approval from the regulating authorities.
- j) Discipline volunteers shall maintain high level of personal discipline and respect for constituted authorities. Coordinators, and indeed volunteers, shall operate within the bounds of NAVC as set out by the ICPC and in line with the aims and objectives of the corps. The Corps is founded on the rock of integrity, accountability and transparency. Hence, every player in the system shall demonstrate a high standard of these qualities. A breach of this requirement shall attract disciplinary measures as determined by the Commission.





Independent Corrupt Practices and Other Related Offences Commission (ICPC)
Plot, 802, Zone A9, Constitution Avenue, Central Area
P.M.B. 535 Garki, Abuja

09 - 5236717 (Tel. & Fax) 09 - 5236694 Website: www.icpc.gov.ng

e-mail: icpcduc@hotmail.com icpcnig@yahoo.com prr@icpc.gov.ng