



## INDEPENDENT CORRUPT PRACTICES AND OTHER RELATED OFFENCES COMMISSION

# COMMUNICATION POLICY



★★★ ANNIVERSARY ★★★

2000-2020

20/20 *A New Vision*



**INDEPENDENT CORRUPT PRACTICES  
AND OTHER RELATED OFFENCES COMMISSION**

# **COMMUNICATION POLICY**

## **ICPC MISSION**

To rid Nigeria of corruption through lawful enforcement and preventive measures.

## **ICPC Strategic Action Plan 2019 - 2023**

### Key Objectives

- 1: More effective reportage, investigation and prosecution of corruption cases.
- 2: Reduction of system-induced corrupt practices.
- 3: Increased Managerial effectiveness of ICPC.

# SECTION 1

## 1.1 Description

The Communication Policy of the Independent Corrupt Practices and Other Related Offences Commission (ICPC), referred to in this document as “the Policy”, is made pursuant to Section 70 of the Corrupt Practices And Other Related Offences Act 2000 in consultation with the Board, and provides guidelines to regulate communication with internal and external stakeholders of the Commission.

**1.2** In exercise of the powers conferred on me by section 7(1) of the Corrupt Practices and Other Related Offences Act, 2000 (“the act”) and section 70 of the Act, I hereby issue, make and approve the following Policy/Guideline

**1.3** It shall be the duty of every member of staff, particularly staff of the Commission's Education and Public Enlightenment departments to familiarize themselves with the provisions of this Policy.

**1.4** The provisions of this “Policy” apply to personnel of the Commission and authorized persons.

**1.5 Interpretations**

In this Policy, the following words are interpreted as follows:

- a. **“ACTU”** refers to Anti-Corruption and Transparency Unit in government MDAs.
- b. **“Authorized Persons”** include (i) The Chairman (ii) Board Members (iii) Management Staff and (iv) Staff members
- c. **“Basic Information”** is any information about ICPC, including its mandate, functions, operations, personnel and policy statements that is authorized to be or is already in the public domain;
- d. **“Chairman”** refers to the Chairman of the Independent Corrupt Practices and Other Related Offences Commission;
- e. **“Commission”** means the Independent Corrupt Practices and Other Related Offences Commission;
- f. **“Communication”** is the process of transferring written or verbal Information (message) from a

- sender to a receiver, who interprets the information;
- g. **“Confidential Information”** means Information that is not made publicly available by ICPC, as well as information of third parties that ICPC is obligated to keep confidential;
  - h. **“External Communication”** is the transfer or exchange of information with external stakeholders;
  - i. **“External Stakeholders”** include Ministries, Departments and Agencies; law enforcement agencies; traditional, religious, political and educational institutions; the Media; non-governmental organisations; civil society organisations, professional bodies, international organisations; development partners; parties to ICPC operations, vendors, the general public within and outside Nigeria; etc.;
  - j. **“ICPC Act, 2000”** refers to the Corrupt Practices and Other Related Offences Act, 2000;
  - k. **IEC** means Information, Education and Communication;
  - l. **“Information”** means the facts or details about

something that form ingredients of communication;

- m. **“Internal Communication”** is the transfer or exchange of information with internal stakeholders;
- n. **“Internal Stakeholders”** refer to the Staff, Management and Board of the Independent Corrupt Practices and Other Related Offences Commission;
- o. **“MDAs”** refers to Ministries, Department and Agencies;
- p. **“Social Media”** are web-based media channels such as (Twitter, YouTube, WhatsApp, Instagram, Facebook, etc.);
- q. **“Secretary”** refers to the Secretary to the Independent Corrupt Practices and Other Related Offences Commission;
- r. **“Conventional Media”** are media houses (including those registered with ICPC as partners) that disseminate news/information to the general public or specific segments of the public. These include Print media (newspaper, magazines and other publications), Broadcast media (Radio, Television, Cinematography) and Internet-based media (online newspapers, news blogs, online television and online radio).

# SECTION 2

## 2.1 Introduction

The Independent Corrupt Practices and Other Related Offences Commission (ICPC) has a 3-pronged statutory mandate to diminish corruption as enshrined in S.6 (a) – (f) of the Corrupt Practices and Other Related Offences Act 2000. These are i) receipt, investigation and prosecution of reports of corrupt practices; ii) study, review and correction of corruption-prone systems and procedures of government bodies with a view to diminishing corruption; and iii) education and mobilization of the public against corruption.

These three functional areas of Enforcement, Prevention and Public Engagement against corruption form the source and fulcrum of the Commission's operations and activities. In all three areas, effective communication is vital to drive the achievement of corporate goals and objectives at both internal and external stakeholder interfaces.





### **ICPC 3-Pronged Mandate against Corruption**

A comprehensive communication policy that strategically links corporate communication to the Commission's objectives and focus will guide and govern information flow within and across internal operational and support functions as well as external relationship exchanges, and facilitate an enhanced delivery on the mandate of the Commission. This is the philosophy behind the ICPC Policy.

#### **2.2 Purpose of the Policy**

The purpose of this Policy is to regulate communication with ICPC's internal and external stakeholders.

#### **2.3 Goals of the Policy**

The goals of the Policy are in alignment with the key Objectives of the ICPC Strategic Action Plan, 2019 – 2023. The goals are to ensure:

- I. Communication of consistent messages that are congruent with the Commission's mission, vision and culture.

- ii. A recognizable, visible and sustainable anti-corruption brand.
- iii. An enhanced image for the Commission.
- iv. Increased public awareness and engagement in anti-corruption efforts.
- v. Promotion of ethical standards and reduction in corruption across MDAs and the larger society.
- vi. Enhanced internal managerial and operational processes to boost delivery on the operational targets of the Commission.

## **2.4 Policy Statement**

ICPC commits to the strategic dissemination of timely and factual information to its stakeholders for the purpose of achieving its vision and mission. For this reason, all internal and external communication shall align with the guidelines in this Policy and conform to approved standards.

## **2.5 Guiding Principles**

Realizing that structured and strategic communication is essential to improved internal managerial effectiveness and critical to the achievement of the operational mandate of the Commission, particularly the public engagement function, the following principles shall be observed as applicable:

- i. Only designated authorized persons are permitted to have formal engagement and interaction with both internal and external stakeholders and to perform all

- functions of communication in the Commission.
- ii. Apart from basic information that is already in the public domain, all requests for information by external parties shall first be cleared by the Chairman or his designated representative.
  - iii. Operational information that is in the possession of officers shall be handled in a confidential manner at all times.
  - iv. Operational information shall not be divulged to any person (internal or external) verbally or in writing except as otherwise directed by the Chairman.
  - v. Information regarding general administrative and operational issues shall be communicated promptly to all internal stakeholders through approved channels. In this regard, in addition to the general channels, such communication shall be effected through the Office of the Director, State Office Coordination to ensure delivery to the Commission's State Offices.
  - vi. Communication from heads of departments and units at Headquarters to their Unit or Departmental members at state level shall be routed through the State Commissioner. All official communication from the state offices to HODs/HOUs at Headquarters shall also be via the State Commissioner.
  - vii. It is incumbent on authorized persons to ensure accuracy at the material time information is being communicated.

- viii. All internal and external written communication shall be consistent in format – Arial font size 14 with appropriate paragraphing, heading and closing. An approved tagline such as 'Integrity Pays'; 'Shun Corruption'; 'Do the Right Thing'; 'A corruption-free Nigeria'; 'Say No to Corruption' etc. encapsulating the ethos and core message of the Commission may be printed on its letterhead and may form part of all internal memos, circulars, notices. The tagline will serve as a rallying mantra at all meetings and gatherings organized by the Commission and may also be on all its communication platforms, visibility materials and souvenirs.
- ix. In all communication, the choice and tone of language shall not be hostile, demeaning, insubordinate, partisan, or reflect religious, ethnic or other bias.
- x. This Policy promotes and validates a two-way communication between the Commission and its internal stakeholders; as well as its external stakeholders.

# SECTION 3

## 3.1 Guidelines for General Communication

- i. Acknowledgment of correspondence from external stakeholders shall be effected within 24 hours of receipt and sent by emails where online addresses are available.
- ii. The Commission shall take full advantage of electronic mail delivery for correspondence to external stakeholders where practicable and follow up with telephone calls in order to minimize delivery by courier. Electronic mails shall only be through the official departmental/unit email address or that of officers. The use of personal domain e-mail addresses is prohibited for official matters except as may be reasonably permitted by exigency.
- iii. Every correspondence going to external stakeholders shall be signed by the Chairman or the Secretary. Alternatively, HODs/HOUs may sign for the Chairman/Secretary as may be dictated by exigency.

### 3.2 Internal Communication

- i. Communication in the Commission shall be conveyed through the appropriate and approved official channels, as defined by the Public Service Rules (PSR), ICPC Conditions of Service or as may be directed by the Chairman.
- ii. Timeline on requests for information by internal stakeholders shall be strictly adhered to by responding departments/units or response given within two (2) working days where a timeline is not indicated.
- iii. All departments/units shall initiate and maintain a directory of contacts of their target stakeholders.
- iv. Notices on matters that require coverage by the Public Enlightenment Department (PED) shall reach the department with at least 48 hours lead time for action.
- v. For speedy communication with all staff, Departments/Units shall make use of *ICPC Broadcast* being managed by Public Enlightenment Department. Information to be communicated shall be forwarded promptly by the responsible department/unit to PED for timely action.
- vi. It shall be the responsibility of Heads of Departments/Units to communicate to staff, general and specific administrative/operational decisions made at higher level intra-Commission meetings as appropriate e.g. the weekly Board & Management Meetings. Records of such regular intra-departmental or intra-unit step-down sessions shall be initiated and maintained.

- vii. Staff opinion shall be encouraged and harvested either directly from staff via the suggestion boxes in the Commission, written or oral submissions or through HODs/HOUs as possible input into proposals of administrative or operational decisions. Regular feedback shall also be encouraged from internal stakeholders.
- viii. Unauthorized disclosure of confidential information is strictly prohibited. This includes operational and third-party information, procurement and administrative processes, movement or travel details of the Commission's personnel etc.
- ix. Communication between members of staff shall be courteous and professional at all times. Staff shall avoid rumour-mongering and gossip.
- x. Members of Staff are to be addressed by their first names or surnames. In written communication all references to staff shall be by their full names (or initials and surname) and official designations. The use of nicknames is prohibited.

### **3.3 External Communication**

#### **3.3.1.The Conventional Media**

The Commission's Public Enlightenment Department has exclusive operational jurisdiction with regard to electronic and print media relations, information management on the

Commission's Internet-based external communication channels and dissemination of anti-corruption messages via television and radio. The Commission recognizes the pluralism and strategic nature of the Media to its anti-corruption communication and behavioural change agenda. It shall therefore pursue the use of the Media as a vehicle for education, dialogue, debate and discussion as well as values re-orientation for its various publics.

### **3.3.1(a) Principles**

In its relations with the Media, the Commission commits to:

- i) Timely and accurate release of reports on all non-confidential activities in the execution of its mandate.
- ii) A cordial and ethical relationship with the Media at all times.
- iii) Boost media understanding of the overall mandate of the Commission and enhance reportage of corruption issues by sponsoring, where resources permit, select media personnel for appropriate anti-corruption training, conferences and events.
- iv) Actively seek collaboration with a critical core of individual journalists and media houses of proven integrity as strategic partners in driving the anti-corruption crusade within their own profession and on the broader societal platform.



### **3.3.1(b) Guidelines**

- i. The Commission shall designate a Spokesperson who has authority to speak for the Commission and for the Chairman of the Commission as necessary and as approved. Unless otherwise directed by the Chairman, no one but the Spokesperson shall speak on behalf of the Commission. This is without prejudice to paper presentations or public addresses made by staff of Education and Public Enlightenment Departments or any other person so approved to speak at a seminar, workshop, conference, panel etc.
- ii. The Spokesperson shall have the authority to access operational information from relevant departments as the need arises to facilitate approved communication with the public.
- iii. Departments/Units have the responsibility to bring to the attention of the Spokesperson, issues within their operational jurisdiction which require prompt public engagement.
- iv. Only the Commission's Chairman and Spokesperson shall have the right to engage, interact and deal with the Media or grant interviews or issue out media statements, releases etc.
- v. Where the designated Spokesperson is not the Head, Public Enlightenment Department, he/she shall be accountable directly to the Chairman.
- vi. To give a publicity boost to the Commission at state level,

this Policy gives approval to State Commissioners to speak to the Media, grant interviews, issue out press releases/statements ONLY on basic information that is already in the public domain. It is incumbent on the giver of such information to ensure clarity and accuracy, with no exaggerations.

- vii. To avoid discordant messaging, every communication from state offices to the Media and other external stakeholders shall align with and be anchored on the Commission's core anti-corruption message.
- viii. Approval of the Chairman shall be obtained before a State Commissioner makes public statements on classified or emerging operational or policy issues at state or national level.
- ix. All statements emanating from the Commission shall be non-partisan, non-judgmental and devoid of ethnic, political, religious or any other bias.
- x. State Commissioners shall submit copies of all media engagements (video or audio recording of interviews, press statements etc.) to the Headquarters for record purposes.
- xi. Apart from routine media releases on court proceedings, asset seizure and forfeiture, educational and ACTU activities; media statements or interviews on arrests, system study reports, government policy or sensitive issues of discourse shall be made only on the approval of the Chairman.
- xii. Beyond news reports and press statements, there shall

be a robust communication of all facets of the Commission's mandate. Public Enlightenment Department shall be proactive in exploiting other forms of writing including features to project and enlighten the public about the work of the Commission, including particularly Corruption Prevention and Values Re-orientation.

- xiii. The Head of Public Enlightenment Department shall exercise good judgement in clearing articles, rejoinders and features concerning the Commission for publication. However, where there is a doubt as to the propriety of a material, then the material shall be submitted to the Chairman for clearance before going to press.
- xiv. Staff of the Commission shall not make public statements of personal opinions regarding the Commission or government policy. Any such statement shall first be approved by the Chairman.

### **3.3.2 Website & Social Media**

The Commission acknowledges the vibrancy and reach of the news media especially among the youths who form a huge part of its communication stakeholders. Among other functions, the Public Enlightenment Department of the Commission is responsible for uploading information on the Commission's website ([www.icpc.gov.ng](http://www.icpc.gov.ng)), sending and receiving information from the Commission's email address ([info@icpc.gov.ng](mailto:info@icpc.gov.ng)), and managing the social media handles on Twitter, Facebook,

Instagram and YouTube. These functions shall be performed on the principles outlined below:

### **3.3.2.(a) Principles**

The Commission:

- i) Shall continue the management of the website and social media handles from the Headquarters as a centralized activity. State offices are by this  
  
Policy not authorized to create their own social media handles.
- ii) Shall follow organisations that are strategic to its overall mandate and not individuals in the social media space. However it shall tag as appropriate, organisations, associations, institutions and individuals relevant to the subject of its posts.
- iii) Commits to accurate, factual and unbiased posts on its social media handles and shall not 'like', 'forward', or 're-tweet' unverified or controversial posts.
- iv) Commits to courteous language in its posts and responses to other social media users.

### **3.3.2.(a) Guidelines**

The following guidelines shall apply:

- i. Daily, robust engagement on the social media.
- ii. Campaigns, opinion polls, convergent forums (e.g. Tweet-meets) shall be utilized at regular intervals to up-scale the visibility of the Commission and increase awareness of the public on its activities and core messages.
- iii. As much as practicable, posts on social media shall be accompanied by appropriate infographics, statistics, animations, cartoons, video and audio clips, etc.
- iv. National, religious and global commemorative events shall be acknowledged as they occur, and tied to the Commission's core message as applicable.
- v. The Head of Public Enlightenment Department is responsible for the appropriateness of content and quality of what goes out on social media.
- vi. Comments on emerging national issues may be made on social media after due clearance with the Head of Department who shall seek clearance from the Chairman, when in doubt.
- vii. Staff of the Commission are encouraged to follow the Commission on its social media handles, to 'like', 're-post' and 're-tweet' official posts. It is particularly compulsory for staff in Public Enlightenment and Education departments to engage in these activities as a matter of official duty.

- viii. Evaluation of social media engagement shall be undertaken at periodic intervals using analytics available on the respective media.
- ix. Staff shall be cautious in their use of social media and not post unverified statements (fake news), hate speech or anything likely to cause embarrassment to the Commission.
- x. Staff shall also be conscious of and avoid personal social media interactions which may negatively affect the image of the Commission or present them as partisan in the eyes of the public.

### **3.3.3 Defendants**

Only authorized persons are permitted to engage with defendants.

- i. Staff shall not use personal channels such as telephones, emails or personalized letters to communicate with defendants.
- ii. Staff shall use only official channels to communicate with defendants. Each telephone call made shall be logged and records maintained of all written correspondence.
- iii. Where a conflict of interest exists as to the defendant(s) assigned to an investigator or prosecution lawyer, the latter shall communicate in writing to the Chairman through the Head of Department seeking approval to decline such assignment.
- iv. Any suspect who comes to the Commission on invitation shall fill a form and have personal data and biometrics

captured in an information system, indicating purpose of invitation, who issued the invitation and date of appearance. Record of when he leaves the Commission's premises will also be logged in a register.

### **3.3.4 The General Public- (Education and Enlightenment)**

This Policy recognizes the challenges of poor understanding of corruption issues including the behaviour and societal norms that encourage it, as well as public cynicism and apathy towards the anti-corruption war. To get citizen buy-in and support to combat corruption, attitudinal and normative changes have to be encouraged in the larger society. Although some positive changes have occurred in the level of public understanding and support in the two decades of the Commission's establishment, there is still a lot of work to be done to get to a position where there is correspondence between the rejection of corruption by the people and the government's will to fight it. This is the aim of the public education and enlightenment function of the Commission. This segment of the Policy is therefore a deliberate effort to guide the strategic communication activities of the Commission to achieve the desired aim.

The work of Education and Public Enlightenment departments is to be guided by the following principles:

### **3.3.4 (a)Principles**

- i. Communication projects shall be conceptualized and implemented as long-term campaigns to enable the anti-corruption and behavioural change message to sink into the psyche of the people and create the desired impact.
- ii. Know-Your-Audience': Stakeholders for the communication projects of the Commission run the gamut of the entire population across all sectors, but for strategic targeting, they shall be identified, defined and segmented into groups or clusters based on empirical research of their interests, concerns, advantages and capabilities to engage with and spread the anti-corruption message further. The departments shall create and maintain such an evidence-based comprehensive database to enable informed audience selection, better targeting of anti-corruption messages and creating networks of common understanding about the issues of corruption. Without prejudice to other segments of society, the youths shall be prioritized as target stakeholders because of their zeal and creativity to bring about societal change and the possibilities a corruption-free Nigeria holds in securing their future and bringing their aspirations to fruition.



- iii. Define the Problem and Message: Behavioural problems around corruption shall be defined and anchored on themes that reflect the core message and key objectives of the Commission. The problem and message shall be adapted to the peculiarities of the target audience. Messaging shall be people-centred, socio-culturally relevant and speak to the audience's concerns and/or aspirations. Suitable themes include the 'Opportunity Cost of Corruption; Impact of Corruption; Importance of Citizens to the Fight Against Corruption; Safe Reporting, Importance of Whistle-blowing, Asset Recovery etc.
- iv. Determine Message Format: Formats for messages (speeches, jingles, discussions, stickers, fliers, posters, social media posts, skits, music, games, infographics, cartoons etc.) shall be aligned to the characteristics of the target audience to achieve maximum impact.
- v. Go-Where-Your-Audience-Is': The choice of communication channel is to be informed by evidence of the platform where the majority of the target audience can be found (television, radio, newspaper, social media, mobile telephones, village squares, community centres, schools, lecture theatres, offices, billboards, notice boards, entertainment centres, churches, mosques etc.).
- vi. Each communication project shall be supported by a proposal showing evidence of value for money and strategic thinking with the following elements: negative behaviour, ideal behaviour, SMART objectives (Specific,

Measurable, Achievable, Relevant & Time-oriented), target audience, activities, evaluation indicators, risks and assumptions, message, channels, specific communication strategy to be deployed.

- vii. Concluded Enforcement and System Study activities shall form input into communication projects as live case studies.
- viii. Delivery of communication projects and accompanying IEC materials shall be in English language as well as the dominant local language of the area of engagement, where applicable.

### **3.3.4 (b) Guidelines**

- i. Only authorized persons shall have formal engagements with other authorities, international organisations, development partners, non-governmental organizations, the general public etc.
- ii. Heads of Departments/Units shall exercise good judgement in clearing papers/ speeches/lectures to be presented by their Unit or Departmental members to external stakeholders and ensure propriety and accuracy of information therein. Presentations by the Heads shall be cleared by the Chairman.
- iii. All lectures and presentations by authorized persons shall be produced in the approved Commission format (font type, size, style), carry the Commission tagline and be anchored on the Commission's core anti-corruption message.

- iv. In all interactions and events with external stakeholders, staff shall not give personal domain e-mail addresses as their contact. Their assigned official e-mail addresses shall be used at all times.
- v. Feedback shall be encouraged from external stakeholders.

### **3.4 Disclosure of Confidential Information**

- i. ICPC is committed to providing timely, accurate and complete disclosure of basic information, including petitions.
- ii. Confidential or classified information in ICPC refers to information on investigation, intelligence, enforcement proceedings, systems review and other classified information.
- iii. Disclosure of confidential information is strictly prohibited as prescribed by the Corrupt Practices and Other Related Offences Act, Official Secrets Act and Oath of Secrecy applicable under the Oaths Act;
- iv. In addition to any other vetting procedure that may be demanded of staff as required by ICPC Conditions of Service or the Public Service rules upon assumption of duty or in the course of their employment, a non-disclosure of information commitment shall be administered on staff in the form of the Oath Of Secrecy contained in Schedule 1 of the Oaths Act and reproduced in Schedule 1 of this Policy.

# SECTION 4

## 4.0 Miscellaneous Provisions

### 4.1 The Commission:

- i. Shall explore or strengthen existing strategic collaborations with public and private organisations relevant to its public education and mobilization mandate e.g. Nigerian Television Authority (NTA), National Orientation Agency, (NOA), Federal Radio Corporation of Nigeria (FRCN), Nigerian Union of Journalists (NUJ), Nigerian Guild of Editors etc.
- ii. Shall seek to improve existing cooperation and operational synergy with sister Anti-corruption Agencies by exploring joint execution of communication projects through pooled funds e.g. billboards, television and radio productions etc.; and leveraging one another's social media handles and other platforms for improved visibility and public awareness of anti-corruption and values re-orientation.

- iii. Shall explore collaborative opportunities with the entertainment industry to enable its anti-corruption message go further and entrench its brand in the public psyche.
- iv. Reserves the right to vet and approve any third party communication project being executed on behalf of the Commission to ensure the messaging aligns with its strategic objectives.
- v. Prohibits the demand or acceptance of gratification in the form of commissions or whatever means by staff, when dealing with a commercial transaction involving media houses or any other establishment.
- vi. Shall admit and make amends whenever communication errors are made.

## **4.2 Role of Management**

Robust and engaging communication with both internal and external stakeholders depends a great deal on the quality of information content. Thus, the management of the Commission has a critical role to play in creating content . Given the endemic nature of corruption in Nigeria and citizens' heightened interest in anti-corruption news, particularly enforcement news, the Commission shall continue the vigorous pursuit of its mandate and increase efforts in enforcement and prevention operations to provide materials for the production of compelling communication and publicity products.

### 4.3 Role of Staff

This Policy recognises that every member of staff is an image-maker for the Commission at every point of contact with both internal and external stakeholders. Therefore, it is important that staff play this role creditably at each opportunity by adhering to guidelines set out in this policy and communicating to others the best of ICPC corporate culture.

### 4.4 ICPC Stakeholder Communication Channels

For its work, the Commission has an array of communication channels and assets which it shall exploit to the fullest for strategic and effective communication with its various audiences and stakeholders.

**4.4.1 External Stakeholders:** Letters, Seminars, Workshops, Courtesy Visits, Website, E-mail, Twitter, YouTube, Facebook, Instagram, Telephone, Toll-free lines, Newsletters (e- and hard copies), *Mixlr* (an Internet-based real time channel) Publications, Annual Reports, Media publications, Interviews, Television productions, Radio productions, Town Hall Meetings, Citizen Forums, Roundtables, Panel Discussions, Media Releases/Statements, Road shows, Rallies, Drama Sketches and Skits, Billboards, Souvenirs, Paper

Presentations, Advertisement, Leaflets, Manuals, *ICPC Broadcast 2* (an SMS communication platform with the public).

**4.4.2 Internal Stakeholders:** Intranet, E-mails, Letters, Memos, Circulars,

Debriefing Sessions, Board and Management Meetings, Board Meetings, Intra- and inter-Departmental Meetings, Website, *ICPC Broadcast 1* (An internal WhatsApp communication platform for staff), Newsletter (*Integrity House*), General Staff Meetings, Suggestions Box.

## **4.5 Implementation and Enforcement**

### **4.5.1 Implementation**

This Policy comes into effect from the date of approval by the Chairman after consultation with the Board of the Commission. The Secretary to the Commission has the responsibility of ensuring dissemination of this Policy to all staff both at Headquarters and State Offices.

### **4.5.2. Enforcement**

A breach of the provisions of this Policy shall constitute serious misconduct and will be dealt with according to established disciplinary procedures contained in the ICPC Conditions of Service.

#### **4.6 Review**

Compliance with the Policy shall be monitored and its effectiveness evaluated from time to time. The Commission is an adaptive and forward-looking organisation, thus it may review this policy every 2 years or as circumstances may dictate.

#### **4.7 Commencement**

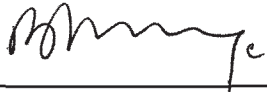
This Policy is made this ..... day of ..... 2020.



## Schedule 1

### “OATH OF SECRECY

I..... swear that I will not directly or indirectly communicate or reveal any matter to any person which shall be brought under my consideration or shall come to my knowledge in the discharge of my official duties except as may be required for the discharge of my official duties or as may be specially permitted by the President. So help me God.”



10/2/2024

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**PROF. BOLAJI OWASANOYE, SAN**  
Chairman, ICPC

