



**INDEPENDENT CORRUPT PRACTICES AND OTHER
RELATED OFFENCES COMMISSION (ICPC)**



**FIGHTING
CORRUPTION
IN NIGERIA**

**STRATEGIC PLAN
2013-2017**

[Prepared with the Support of Justice for All/Department
for International Development (J4A/DFID)]

J4A

DFID Department for
International
Development

JUSTICE FOR ALL

GLOSSARY

ACs	-	Anti-Corruption Clubs
ACAs	-	Anti-Corruption Agencies
ACACI	-	Anti-Corruption and Accountability Compliance Initiative
ACTU	-	Anti-Corruption and Transparency Monitoring Unit
AV	-	Anti-Corruption Vanguard
BMOs	-	Business Management Organizations
BMPIU	-	Budget Monitoring and Price Intelligence Unit
BPP	-	Bureau of Public Procurement
CCB	-	Code of Conduct Bureau
CPI	-	Corruption Perception Index
CRA	-	Corruption Risk Assessment/Assessor
CSO	-	Civil Society Organization
DFID	-	United Kingdom Department For International Development
EFCC	-	Economic and Financial Crimes Commission
FOI	-	Freedom Of Information
FRA	-	Fiscal Responsibility Act
IATT	-	Inter-Agency Task Team
IFI	-	Integrity First Initiative
J4A	-	Justice for All
KPI	-	Key Performance Indicator
LGII	-	Local Government Integrity Initiative
MDAs	-	Ministries Departments and Agencies
NACC	-	National Anti-Corruption Coalition
NASS	-	National Assembly
NAVC	-	National Anti-corruption Volunteer Corp
NEITI	-	Nigeria Extractive Industry Transparency Initiative
NERDC	-	Nigerian Educational Research and Development Council
NUC	-	National Universities Commission
NFIU	-	Nigerian Financial Intelligence Unit
PAs	-	Professional Associations
PAI	-	Public Accountability Index
SAV	-	Students' Anti-corruption Vanguard
SCUML	-	Special Control Unit against Money Laundering
TBD	-	To Be Decided
TI	-	Transparency International
TPA	-	Terrorism Prevention Act
TUGAR	-	Technical Unit on Governance and Anti-corruption Reforms
UNDP	-	United Nations Development Programme
UNODC	-	United Nations Office on Drugs and Crimes
USAID	-	United States Agency for International Development

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ACKNOWLEDGEMENT

The Board of the Independent Corrupt Practices and Other Related Offences Commission (ICPC) wishes to acknowledge the work of the staff of the Commission in the development of this Strategic Plan. A select cross-section of staff attended a three-day workshop during which the analysis and planning of priorities and key actions took place. This work formed the basis of this plan that has now been approved by the Board and represents an agreed plan for the ICPC for the period from 2013-2017. The Board looks forward to working closely with all staff to achieve its implementation.

The ICPC would like to acknowledge the contributions of our stakeholders to the planning process and thank our sister anti-corruption agencies, the Economic and Financial Crimes Commission (EFCC), the Code of Conduct Bureau (CCB), Nigerian Financial Intelligence Unit (NFIU) and Technical Unit on Governance and Anti-Corruption Reforms (TUGAR) for their support. We look forward to working with all these agencies in building a strong anti-corruption framework.

The United Kingdom, Department for International Development (DFID) through Justice for All (J4A) programme provided funding and technical support for the development of this strategy. The Board would therefore like to acknowledge this valuable contribution and look forward to their continuing support as we move to implementation.

CHAIRMAN'S INTRODUCTION

It is my pleasure to present the 2013–2017 Strategic Plan of the Independent Corrupt Practices and Other Related Offences Commission (ICPC).

The current Board, upon its inauguration in November 2011, immediately set up an ad-hoc Board Committee to fashion out its road-map after a stock-taking exercise which included a review of the DFID-sponsored Strategic Action Plan: 2004-2008. Fortunately, DFID was at that material time engaged in a workshop with our staff to produce a new five-year Strategic Action Plan: 2013-2017.

During the joint review sessions, it was most gratifying to note that both the ad-hoc Board Committee Report and the draft Strategic Action Plan arrived at similar conclusions. This current document provides a five-year strategic framework to guide the Commission in prosecuting the war against corruption in Nigeria.

DFID's support programmes for ICPC, through Justice for All has never been in doubt. I therefore use this opportunity to express our sincere gratitude to DFID and pray that the partnerships will continue to wax stronger.

The Commission also wishes to solicit for the support of the UNODC, UNDP, TUGAR and other agencies in the implementation of this plan.

Thank you.

Ekpo Nta, Esq.
Chairman (ICPC)
2012

1. BACKGROUND

1.1. In planning, facts help to make the best guesses, stay on track to accomplish an objective and thus prepare for the future. Successful organizations maintain a clear vision and a common purpose that enable them fulfil their objectives within an agreed framework of a strategic plan.

1.2 In June 2004, the ICPC formulated a strategic plan with the help of relevant stakeholders, but implementation of the plan was not carried out fully. In preparing for this current exercise, the ICPC evaluated its experience and important lessons learnt from earlier strategic planning exercise.

1.3 Thus, the ICPC in collaboration with the UK Department for International Development (DFID) and Justice for All (J4A) developed this strategic plan to make the Commission more proactive and performance based. Attention has been given to improving the management capacity for planning and implementation, and considerable emphasis has been placed on how implementation and performance will be tracked and measured. Improved performance in the anti-corruption cause and the institutional change necessary to achieve this, was also highlighted.

2. THE INDEPENDENT CORRUPT PRACTICES AND OTHER RELATED OFFENCES COMMISSION (ICPC)

2.1 Establishment

The ICPC came into being in June, 2000 with the enactment of the Corrupt Practices and Other Related Offences Act, 2000¹. The Act was signed into law on 13th June, 2000 by Nigeria's former President, Chief Olusegun Obasanjo, following which the ICPC was inaugurated on 29th September, 2000.

In Section 6 of the Act, the Commission is mandated to carry out investigation, prosecution, system study and review, education as well as enlistment and fostering of public support in combating corruption.

Before the establishment of the ICPC, Nigeria had been stigmatized by the international community as being very corrupt and classified as the second most corrupt country in the world. For three consecutive years; 2000, 2001 and 2002, it maintained this unenviable position. The rating came up as a consequence of failed attempts to wipe out corruption or reduce it to the barest minimum in the country.

The Penal Code and the Criminal Code which were in existence before the enactment of the Act, contain provisions meant to prohibit corruption and punish the corrupt. However, the enactment of the Act setting up the ICPC marked the first time a specialized agency was established to fight corruption.

2.2 Legislation

The Act is made up of 71 Sections:

Section 1	Cites the Act
Section 2	Interpretation of the Act

¹ Section 3 of the Corrupt Practices and Other Related Offences Act, 2000 hereinafter referred to as the Act

Sections 3-7	Establish the Commission and provide for the appointment and powers of its officers. In particular, Section 6 spells out the mandate of the Commission which is not only penal but also preventive and advisory
Sections 8-26	Offences and penalties
Sections 27-42	Powers of investigation, search, seizure and arrest
Sections 43-52	Provisions relating to powers of the Chairman of the Commission and asset recovery among others
Sections 53-60	Relate to evidence
Sections 61-64	Prosecution and trial of offences
Sections 65-71	General provisions

Apart from sections 8–26 as noted above, sections 28 as well as section 64 of the Act also cover offences and their penalties. The various offences have been broadly grouped into eight classes, i.e.:

- | | |
|-----------------------------------|---|
| 1. Sections 8,17,19,24 | Gratification |
| 2. Sections 8,9,10,18,19,21,22,23 | Bribery |
| 3. Sections 12,13,19 | Fraud |
| 4. Section 14 | Postal Crimes |
| 5. Sections 16,25,64(3) | False Statements |
| 6. Section 15 | Deliberate Frustration of investigation |
| 7. Section 26 | Conspiracy |
| 8. Section 28 | Concealment of Information |

Section 61 (2) of the Act also empowers the ICPC to prosecute a public officer or any other person for the offences of bribery, corruption or any other related offences committed by such public officer or other persons contrary to any laws in force before or after the coming into effect of the Act.

2.3 Independence of the Commission

The independence of the Commission is guaranteed under Section 3 (14) of the Act, though the Commission draws its fund through the National budgetary process. Legislative oversight is performed by the Committees on Anti-Corruption of the National Assembly, namely: the Senate Committee on Drugs, Narcotics, Financial Crimes and Anti-Corruption, and the House of Representatives Committee on Anti-Corruption, National Ethics and Values.

2.4 Structure of the Commission

The Board of the Commission consists of a Chairman and twelve (12)² other members, two of whom shall come from each of the six geo-political zones. The Chairman and members of the Commission who shall be persons of proven integrity shall be appointed by the President, upon confirmation by the Senate, and shall not begin to discharge the duties of their offices until they have declared their assets and liabilities as prescribed in the Constitution of the Federal Republic of Nigeria. The Chairman has the powers to control, supervise and give general direction for the efficient and effective functioning of the Commission. In this regard, he is empowered to issue Standing Orders as provided by Section 7(1) of the Act. The Act also provides for a Secretary, who shall be appointed by the President, and shall function under the general direction of the Chairman, and is responsible for keeping the records of the Commission as well as the general administration and control of the staff of the Commission.

² Section 3(3) of the Act

The operational duties and execution of policies are carried out by 9 departments and 10 units namely:

Departments

1. Investigation Department
2. Prosecution Department
3. Planning, Research and Review (PRR) Department
4. Education Department
5. Public Enlightenment Department
6. Special Duties Department (SDD)
7. Corruption Monitoring and Evaluation (CME) Department
8. Administration Department
9. Finance and Accounts Department

Units

1. Chairman's Special Unit (CSU)
2. Financial Investigation Unit (FIU)
3. Special Investigation Team (SIT)
4. Assets Tracing, Recovery and Management (ATRM) Unit
5. Procurement Unit
6. International Co-operation Unit (ICU)
7. Clinic Unit
8. Petition Registry Unit
9. Audit Unit
10. Intelligence and Security Support Unit (ISSU)

The Headquarters of the ICPC is situated in Abuja, the Federal Capital Territory (FCT). The Act empowers the ICPC to establish one or more offices in each state of the federation and the Federal Capital Territory. At present, the ICPC has offices in fifteen states of the federation. The total staff strength is eight hundred and three (803).

3. LEGAL AND INSTITUTIONAL MEASURE ON ANTI-CORRUPTION WORK IN NIGERIA

3.1 Previous Initiatives

A number of anti-corruption initiatives were put in place between 1977 and 1996. These include: the Jaji Declaration by the former Head of State, Olusegun Obasanjo (1977); the Ethical Revolution of President Shehu Shagari (1981–1983); the War Against Indiscipline (WAI) by the former Head of State, Muhammadu Buhari (1984); the National Orientation Movement by the military President, Ibrahim Babangida (1986); Mass Mobilization for Social Justice and Economic Reconstruction (MAMSER) by President Ibrahim Babangida (1987); War Against Indiscipline and Corruption (WAIC) by the former Head of State, Sani Abacha (1996). However, most of these initiatives were not sustained due to poor funding and lack of political will and commitment to fighting corruption.

With the advent of the fourth republic in May 1999, the fight against corruption assumed a different dimension as the fight became more focused. The first Bill presented by the former President, Chief Olusegun Obasanjo to the National Assembly was passed into law by the National Assembly as the Corrupt Practices and Other Related Offences Act, 2000. The National Assembly has passed other legislations to enhance and sustain the fight against corruption in Nigeria. Notwithstanding these legislations and initiatives against corruption, major challenges still exist in the enforcement of the rule of law and ensuring effective accountability.

3.2 Anti-Corruption Institutional Framework

The 1999 Constitution as amended, established the Code of Conduct Bureau and Code of Conduct Tribunal. The Bureau is empowered to receive complaints and investigate same, and where necessary refer cases of violations of the provisions of the Code for public officers to the Code of Conduct Tribunal for adjudication.

The Corrupt Practices and Other Related Offences Act, 2000 established the Independent Corrupt Practices and Other Related Offences Commission (ICPC). The Commission is vested with the mandate to enforce, prevent and foster public support against corruption.

The Economic and Financial Crimes Commission (EFCC) was established through the enactment of the Economic and Financial Crimes Act, 2002. The EFCC was created to enforce laws pertaining to economic and financial crimes. In addition, efforts to combat money laundering and terrorist financing are supported by the operation of Nigerian Financial Intelligence Unit (NFIU) and the Special Control Unit against Money Laundering (SCUML).

The Budget Office, created out of the Ministry of Finance and the Budget Monitoring and Price Intelligence Unit (BMPIU) popularly known as Due Process Unit, was aimed at bringing sanity and prudence into public expenditure, budgeting and public procurement in Nigeria. This initiative led to the establishment of the Bureau of Public Procurement (BPP) in 2007 that provides the legal and regulatory framework for procurement in Nigeria.

The Nigeria Extractive Industry Transparency Initiative (NEITI) is the organization established to ensure due process and transparency in the payment made by all extractive industries to the federal government.

Administrative units such as the Technical Unit on Governance and Anti-Corruption Reforms (TUGAR) and Inter Agency Task Team (IATT) were also established to improve the overall coordination and development of a national anti-corruption strategy.

4. FRAMEWORK OF THE ICPC STRATEGY

4.1 Rationale for the Strategy

A strategic plan is a road-map that is designed to give a clear vision and objective of the Commission, and aid in the allocation of resources for the delivery of the objectives. It defines

what activities are to be carried out, how/where such activities will be carried out and the persons/departments responsible for carrying out their activities within a given time. It also provides a basis on which performance can be measured and establishes a framework for informed change where necessary.

Through the strategic plan, the ICPC aims to assess its current position, clearly establish its objectives and how to achieve them. This plan will enable the Commission to allocate resources properly, focusing on key priority areas.

4.2 Scope of the Strategy

The strategic plan is a five-year medium-term plan which seeks to reposition the Commission as a professional and effective anti-corruption institution. Its scope covers the assessment of the ICPC and its internal capacity, operational procedures, implementation strategies to achieve improved performance and set objectives, and how to improve the performance of ICPC across all facets of its operations.

4.3 The Process of Developing the Strategy

The process of developing the strategy commenced with an organisational assessment undertaken by consultants. The findings were presented to the ICPC management and verified in a one-day workshop where the 2004 strategic plan was also analysed. The strategy was developed at a three-day workshop organized for the officers of the ICPC from the Head Office and State Offices. In addition, the stakeholders gave their assessment and expressed their expectation for a more effective and efficient ICPC. Participants were divided into discussion groups to assess the organisation's performance as well as identify future priorities. The outcome was further analysed and harmonized by the ICPC coordinating committee while the drafting was undertaken by ICPC staff.

5. STRATEGIC REVIEW OF THE ICPC

5.1 External Environment

The rapidly changing environment within and outside Nigeria demands a fresh strategic focus by the Commission. This is evident from national and international assessments that confirm that corruption has continued to thrive in Nigeria.

Globally, corruption is linked to poor governance, weak institutions and lack of accountability which if unchecked combine to create social instability, insecurity and low economic development. Besides, the growth of international criminal activity and its global inter-linkages is a major challenge to law enforcement worldwide. Also, the spread of international terrorism threatens national and regional security and is closely linked to criminal and money laundering networks. Tackling corruption and its manifestations must be a key priority for all responsible and accountable governments.

The recent survey by the National Bureau of Statistics³ indicates that the population living in

³Nigeria Poverty Profile 2010

poverty increased from 20 million in the 1980s to about 120 million in 2010. The rising poverty and social insecurity have been largely attributed to corruption and poor financial and natural resources management.

From the inception, the Commission has striven to meet its mandate of tackling corruption in Nigeria through law enforcement, prevention and public education. It has recorded modest achievements in the area of enforcement despite obvious challenges.

The Commission has also conducted educational activities through the length and breadth of the country and these have impacted positively on public awareness and increased the level of participation in the Commission's programmes among which are the National Anti-Corruption Volunteer Corps (NAVC) and the National Anti-Corruption Coalition (NACC).

In the same vein, several public institutions have been strengthened, leveraging the preventive mandate of examining and directing the review of the systems, practices and procedures of public institutions that facilitate corruption.

In addition, through its Youth Development Programmes, the Commission in collaboration with the Nigeria Educational Research and Development Council (NERDC), developed the National Values Curriculum (NVC) and infused its elements into subject curricula at the Basic, Post Basic and Teacher Education Levels. The objective of the NVC was to bridge the gap that existed in subject contents vis-à-vis values and ethics, and thus raise the bar of integrity in the education domain.

There are also special projects for the youths, among which are: Integrity Lecture Series, Anti-Corruption Clubs in Secondary Schools, Youth Competitions, Anti-Corruption Vanguard in Tertiary Institutions and ICPC/NYSC Anti-Corruption CD Groups.

In spite of these wide-ranging efforts, the ICPC has adopted in curbing corruption, there is still the need to refocus its efforts on strengthening probity and accountability and check impunity in the system. In the light of the foregoing, an analysis of the strengths, weaknesses, opportunities and threats to the Commission was carried out as revealed in the table below:

5.2 Summary of Strengths, Weaknesses, Opportunities and Threats (SWOT)

EXTERNAL ORIGIN (Attributes of the environment)	INTERNAL ORIGIN (Attributes of the organization)
<p>OPPORTUNITIES</p> <ul style="list-style-type: none"> • Improving on the outreach platforms (NAVC, NACC, IFI, SAV, AC, LGII, Town Hall Meetings) to fight corruption • Partnering with DFID, UNDP, USAID, UNODC, NASS, NERDC, NUC and the Media • Full utilisation of the mandate of the Commission • Monitoring of the utilization of the federal allocations to the three tiers of government • Using the System Study mandate as a basis for investigation • Adopting proactive intelligence-based investigations and liaison with other ACAs • Taking advantage of Asset Forfeiture instruments to fight corruption • Collaborating with BPP and NFIU • Exploring the FOI Act, FRA and TPA in implementing the Commission's mandate • Utilising opportunities available for professional training for staff e.g. forensic analysis, asset tracing, etc. 	<p>STRENGTHS</p> <ul style="list-style-type: none"> • Enforcement and Prevention mandates in the Act • Guaranteed Independence of the Commission in the discharge of its duties • Culture of Integrity within the Commission • Capacity building and staff education • Goodwill of citizens and international donors' supports
<p>THREATS</p> <ul style="list-style-type: none"> • Lack of political commitment and concerted action to tackle corruption • Societal tolerance for corruption and apathy towards fighting it • Misplaced societal values encouraging corruption • Inadequate funding of the Commission • Political interference in the activities of the Commission. • Slow judicial process in the trial of corruption cases, and deliberate frustration of adjudication of corruption cases • Legal authority of ICPC contested at State level • Inadequate legislative framework to changing environment, e.g. witness protection • Weak systems of accountability and transparency • Poor public demand for accountability • Potential reputational damage to ICPC due to ineffective management and control of NAVC • Inadequate funding of ACTUs 	<p>WEAKNESSES</p> <ul style="list-style-type: none"> • Crisis of identity: whether the Commission is a civil service organisation or a law enforcement agency • Communication gaps affecting operational performance • Lack of legislative support in amending the Act • Weak internal systems and policies on acceptance of gifts by staff; Ineffective coordination and management of information; absence of policy on job rotation, etc • Lack of adequate professionals in specialised areas • Poor ICT infrastructure and utilization • Limitation of the ICPC Act on persons qualified to be the Chairman of the Commission and Board Members • Limitation of prosecution of ICPC's cases to States' High Courts

5.3 The Challenges

Arising from the SWOT analysis, the Commission must address the identified issues to enable it perform to its optimal potentials.

5.3.1 Internal Challenges

The primary internal challenges are discussed below:

- Lack of adequate funding has affected the Commission's ability to undertake the full range of duties entrusted to it. The processes of investigation and prosecution are resource intensive as are systems studies, education and enlightenment of over one hundred and sixty million Nigerians.
- The nature of the functions of the Commission requires a large number of professionals, e.g. accountants, lawyers, criminologists, forensic experts and appropriate mix of other qualifications. However, these professionals are not adequately represented in the Commission's workforce.
- The inability of the Commission to take a stand on its identity either as a law enforcement agency or a civil service organisation, has taken its toll on staff psyche, morale, conduct and performance.
- The inability of the Commission to explore some of the provisions of the Act, e.g. non-conviction based assets forfeiture, is self-limiting.
- The Act empowers the Commission to establish one or more offices in each state of the federation, however, the Commission has six zonal offices and only nine state offices which do not cover the federation as stipulated in the Act.
- There is a measure of poor work ethics among staff of the Commission.
- There is a lack of formal guidelines on policy implementation in relation to some activities of the Commission, such as case management.
- Poor internal information management exists among departments and units as important information gets to end users late.
- The administrative record keeping system within the Commission is poor resulting in duplication of work, and sometimes confusion in the allocation of responsibilities.
- System study and review is a relatively new strategy in the anti-corruption domain, and only few staff have the requisite experience.
- Tracing, confiscation, recovery and management of assets are yet to be fully explored by the Commission, and skills are required to fully develop these important anti-corruption activities.
- Over dependence on petitions inhibits the Commission from acting proactively in its enforcement duties.
- The Commission has set up 372 ACTUs. However, funding and operational independence have been a challenge to the fulfilment of their mandate.
- The NAVC is a platform for individuals to join the fight against corruption. However, inadequate supervision has given room to limited control of the activities of the corps.

5.3.2 External Challenges

- Delay in the administration of criminal justice and non-review of some outdated laws

constitute impediment to the success of the Commission in its efforts to tackle corruption in Nigeria.

- Lack of political will and interference in the work of the Commission.
- Absence of a National Anti-Corruption strategy to build synergy, collaboration and cooperation among ACAs.
- Societal tolerance for and citizens' apathy to combating corruption constitute a major impediment.

6. RISK ASSESSMENT

	Assumptions and Risk	Impact and Risk Management
i.	<p>Assumption: It is assumed that the government will make increased budgetary provision to enable the ICPC improve its operations.</p> <p>Risk: Failure by the government to provide adequate funding for the ICPC will slow down the Commission's operations and adversely affect its performance.</p>	<p>Impact: Incomplete implementation of the strategic plan would impact negatively on the performance of the Commission.</p> <p>Risk management: Plans should be realistic and emphasis placed on cost-effectiveness and increased efficiency.</p>
ii.	<p>Assumption: Judiciary will embark on measures to reduce delay in the trial of cases. Government will pass legislations for the protection of witnesses and whistle blowers.</p> <p>Risk: Delay in the trial of cases transmits wrong signals to citizens giving the impression that people are not punished for corruption.</p>	<p>Impact: Failure to reform the judiciary erodes citizens' confidence while inadequate legislations for the protection of witnesses and whistle blowers discourage citizens from testifying in public or in court or giving information.</p> <p>Risk management: Ensure close collaboration with the judiciary, the Nigerian Bar Association and the National Assembly.</p>
iii.	<p>Assumption: Government will demonstrate political will to fight corruption, adopt zero tolerance stance and observe the rule of law.</p> <p>Risk: Without observing the rule of law, the Anti-Corruption campaign will fail.</p>	<p>Impact: Selective enforcement of the anti-corruption laws may make the people see the anti-corruption campaign as charade.</p> <p>Risk management: Ensure enforcement of the ICPC mandate and observance of the rule of law.</p>
iv.	<p>Assumption: Operational effectiveness will not be impaired by the existence of a number of ACAs with similar mandates.</p> <p>Risk: Continued competition and lack of coordination among ACAs will cause loss of confidence in ICPC by the public and government, leading to disbandment or fundamental reorganisation.</p>	<p>Impact: Overlapping of functions will reduce operational effectiveness and public support for ACAs.</p> <p>Risk management: Each ACA should focus on its area of strength and be proactive in inter-agency cooperation.</p>

v.	<p>Assumption: The enthronement of ethics in Nigerian society and revival of traditional values will enhance the quest for a corruption-free Nigeria.</p> <p>Risk: The continued erosion of ethics and values in the society will make the efforts to fight corruption more difficult.</p>	<p>Impact: Distorted value system which glorifies ill-gotten wealth as well as ethnic and religious differences will aid corruption,</p> <p>Risk management: Ethics and values should be promoted in the society through public education, enlightenment and mobilization.</p>
vi.	<p>Assumption: The deployment of relevant technology will enhance the Commission's performance.</p> <p>Risk: Failure to deploy technology will impact negatively on the performance of the ICPC.</p>	<p>Impact: Technology has often been used wrongly to perpetrate corruption.</p> <p>Risk management: Need to constantly update ICT infrastructure and build staff capacity to adapt to technological changes.</p>
vii.	<p>Assumption: The amendment of the Act by the National Assembly will make the Commission more proactive and effective.</p> <p>Risk: Putting the blame on the existing law will only divert the Commission's attention from its duties.</p>	<p>Impact: Some of the provisions of the Act have not been fully explored.</p> <p>Risk management: Need to interpret the Act positively and allow the courts to decide on contentious areas.</p>
viii.	<p>Assumption: The integrity of staff will enhance ICPC's credibility and acceptability by Nigerians.</p> <p>Risk: The Commission will lose its integrity if its staff are perceived to be corrupt.</p>	<p>Impact: Confidence in the Commission is determined by the integrity of its staff.</p> <p>Risk management: Need to conduct integrity and security checks on staff before recruitment and thereafter, periodically.</p>

7. STRATEGIC PRIORITIES & RESULTS FRAMEWORK

7.1 The ICPC Approach

The Commission, in carrying out its mandate adopts the three-pronged approach of Enforcement, Prevention and Public Education and Mobilization. In order to effectively implement this mandate, the Commission has reviewed its Vision, Mission, Core values and priorities.

7.2 ICPC's Vision, Mission and Values

The new ICPC vision encapsulates the aspiration of the Commission and the Nigerian populace to have a desirable nation free from corruption. The ICPC is committed to working vigorously towards achieving this end.

VISION

A Nigeria free from all forms of corruption and corrupt practices

The mission statement focuses on eradication of corruption through lawful enforcement and prevention. More importantly, the ICPC emphasizes its culture of adhering to the rule of law while utilizing a full range of available legal instruments in discharging its duties.

MISSION

To rid Nigeria of corruption through lawful enforcement and preventive measures

Measuring Progress:

In reporting on progress towards the achievement of its Mission, the ICPC will utilise the following measures to assess progress at the highest level:

- 1. Improved public perception of/confidence in the ICPC**
- 2. Improved rating of Nigeria on Transparency International's annual CPI**

However, the ICPC recognizes that it may not be solely responsible for progress in this direction as there are other extraneous factors that come into play.

The Commission has a set of fundamental values that support the implementation of the strategy shared by the Board, Management and staff. The ICPC is unequivocally committed to these values in all its interactions. The acronym of PIDET has been adopted to facilitate easy recall.

VALUES

These values are:

- **Professionalism** – Constantly striving to discharge its responsibilities in line with best practices, demonstrating high standards and competencies.
- **Integrity** – Acting impartially and in public interest while also being accountable and transparent.
- **Dedication and tenacity** – Working with determination, commitment and efficiency.
- **Excellence** - Striving for the highest quality based on agreed performance standards.
- **Teamwork** – Cooperating and complementing one another in the discharge of responsibilities.

For the Commission, these values are not just a set of words but agreed ground rules. The following mechanisms have therefore been put in place to ensure compliance:

- Deployment of relevant ICT to help create a culture of efficiency and improved communication;
- Continuous training and reorientation to ensure professionalism, maintain high ethical standards and encourage teamwork; and
- Performance monitoring systems to sustain a culture of accountability and excellence.

7.3 Key Objectives

Results Framework and ICPC M & E Operational Plan have been articulated to support this Strategic Plan.

The key objectives derive from the vision and mission statements and set out the priorities for the Commission over the next five years. The aim is to strengthen the performance and relevance of the ICPC in tackling corruption in Nigeria. The objectives are further elaborated through identified Outcomes and the Operational Plan that indicate the Outputs and Key Activities. A summary of the key objective is presented below:

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

Strategic Objective1: More Effective Reportage, Investigation and Prosecution of Corruption Cases

The focus of this objective is to improve the performance of the ICPC across all facets of its operations.

Planned Outcomes

1. Increased Reporting of Corruption Cases by Citizens
2. Improved Capacity to Investigate Cases

Outputs (specific planned deliverables)

- Simple, user-friendly platforms for citizens reportage of corruption developed and introduced
- Increased regular information to the public on actions taken by ICPC
- Strengthened policy and systems to support increased reporting
- Enhanced capacity of investigators and prosecutors through onsite and offsite training and provision of appropriate work tools
- Time-based case-tracking system established and enforced
- Periodic case review timelines established with preset performance objectives and targets
- Enhanced asset tracing, recovery and management
- Increased enforcement of the provisions of the Act for non-conviction-based asset forfeiture (civil recovery of assets)
- Fully operational intelligence-led investigation with a significant yearly increase in cases filed in courts

Performance measures

These include:

- ✓ Value of assets forfeited/recovered
- ✓ Number of Cases filed for Prosecution (Disaggregated by case category)
- ✓ Number of new petitions received through ICPC-established channels
- ✓ Duration between petition and filing of cases
- ✓ Number of staff trained in investigation and case management
- ✓ Number of non-petition intelligence-led investigations conducted

Strategic Objective 2: Reduction of System-Induced Corrupt Practices

The focus of this objective is to strengthen preventive actions and encourage greater public engagement in tackling corruption.

Planned Outcomes

1. Improved mechanisms for corruption prevention in the public sector
2. Increased public empowerment against corruption

Outputs (specific planned deliverables)

- Strengthened System Studies of MDAs to determine corruption-prone processes, procedures and policies; review same as well as direct and monitor compliance
- Increased partnership with BMOs and PAs to enforce codes of practice
- Increased partnership with ACAs and other accountability institutions for a coordinated impact on the fight against corruption
- Published annual audit of selected MDAs' implementation of anti-corruption and accountability legislation and regulations
- Strengthened mechanism for increased independence of the ACTUs
- Reporting format for all ACTUs developed, adopted and enforced.
- NAVC Structure and Strategy reviewed and effectively aligned with ICPC's operational strategy
- Strengthened coordination of the NACC
- Completed Integrity Compliance Scorecard to assess MDAs' risk vulnerability

Performance measures

These measures will include:

- ✓ Number of MDAs assessed/audited for compliance with the ICPC-led ACACI
- ✓ Number of MDAs that made progress in complying with the ACACI
- ✓ Number of ACTUs that submitted periodic operational reports and raise MDA anti-corruption compliance issues.
- ✓ Number of actions taken in response to issues raised from ACTUs' reports
- ✓ Number of oversight actions taken by ICPC-supported CSO platforms

- ✓ Number of hits and feedbacks on ICPC websites
- ✓ Number of sensitization sessions conducted by ICPC
- ✓ Number of anti-corruption clubs and vanguards formed

Strategic Objective 3: Increased Managerial Effectiveness of ICPC

The focus of this objective is to address issues of internal capacity, structures, systems and procedures to bring about a more professional and effective organisation.

Planned Outcomes

Improved ICPC Management Style and Culture

Outputs (specific planned deliverables)

- More effective and objective system for employees' performance evaluation
- Improved ICPC work quality and reduced bureaucracy
- Improved system for internal and external communications
- Developed systems of "How tos" (Operational Processes/Manuals) for key operational processes like reports, memos and meetings
- Developed ICT strategy for ICPC to upgrade the Commission's ICT infrastructure and capacity
- Devised budget proposal for the implementation of the Strategic Plan covering its full duration
- Enhanced training policy and practice to meet the needs of the Commission
- Evaluation of progress in plan implementation undertaken on a periodic basis

Performance measures

These include:

- ✓ Organizational scorecard on an annual PAI
- ✓ Number of partnership actions/initiatives taken in collaboration with other ACAs
- ✓ Number of petitions that met case tracking standards of acknowledgement, investigation and feedback.

8. STRATEGY IMPLEMENTATION

In implementing the strategy, the Commission will engage staff by encouraging communication of the strategy throughout the organisation and developing a performance management system that links peoples' roles with their contributions.

A feedback system will be developed to monitor and measure progress towards the achievement of the strategic objectives through the following:

- Executive Feedback Survey to establish the degree of compliance among top management
- Employees' Feedback Survey to establish the current degree of alignment and engagement among staff
- Stakeholders' Feedback Survey to measure stakeholders' satisfaction levels and the Commission's performance in the anti-graft war.

In addition to the above, team spirit will be built to harness the power of teamwork to achieve success, while laying emphasis on five key components necessary to support implementation, viz: people, resources, structure, systems and culture.

People

The first stage of implementing the plan will be to make sure that staff are properly placed, taking into consideration their areas of competencies and skills. The Commission will improve employees' skills through training and ensure adequate motivation of staff towards attainment of the strategic objectives.

Resources

The Commission needs sufficient funds and enough time to support implementation. The Strategic Plan will be utilised to present annual budgets to the government to seek financial support needed for full implementation. In addition, employees must create time to implement the activities in the strategic plan.

Structure

The organisational structure of the Commission will be reviewed and streamlined; lines of authority established and channels of communication made more effective.

Systems

Management and technology systems will help to track the progress of plan and make adaptation to changes faster. As part of the system, the Commission will build in milestones into the plan that must be achieved within specific time frame. A reporting system will be developed for tracking the progress and milestones. Meetings to review the progress will be scheduled quarterly.

Culture

The Commission will create an environment that commits its staff to the organisation's mission and reinforce the importance of fully implementing its objectives. The Commission will positively strive to build a "can do" culture where people are encouraged to take initiatives and be rewarded for their efforts. Enhanced communication will be a priority, utilising relevant ICT but also emphasising face-to-face communication as a means of strengthening teamwork and building a more effective work environment.

9. MONITORING AND EVALUATION (M&E)

Background

The M&E planning framework as an integral part of the Strategic Plan is designed to serve two major purposes. First, as a tool and desk reference, it provides guidance to the Commission's management for improved service delivery, while also providing a constant overview for the Board of the ICPC. Second, it supports improved performance monitoring by providing measurable indicators that can be tracked over time and used for improved monitoring and evaluation as well as reporting on progress.

This M&E planning framework has three key components, namely; the Results Framework, the Performance Monitoring Matrix and the M&E Operational Plan. The Results Framework captures the results logic, showing the causal linkage between the Mission, the overall Objectives and expected impact on the Commission. The Performance Management Matrix details key performance measures (indicators) for each level of expected result, defines the

indicator to be used and unit of measurement as well as the plan for collecting data and reporting performance data on a regular basis. The M&E Operational Plan lays out specific targets to be delivered (outputs) and key activities/actions required to improve the performance and contribution of the Commission's functional units in the achievement of results. Overall, this combination of key management information provides data and feedback to support decisions about necessary adjustments and the way forward.

The M&E planning framework also serves as a communication tool that allows the ICPC and its stakeholders (internal and external) to understand the key objectives the Commission must achieve, and the progress made towards achieving them.

The M&E planning framework is a living document and a constant desk reference for all the operational units of the Commission. Periodic updates, revisions and additions will be made as necessary to effectively reflect changing realities and provide a useful managerial resource for the Commission's staff and stakeholders.

The ICPC Result Logic

The overall mission of the ICPC is "to rid Nigeria of all forms of corruption through Lawful Enforcement and Preventive Measures". This is an ambitious goal to which the Commission would contribute significantly but may not claim total attribution nor be totally held accountable for. However, within the provisions of the Act, and the Strategic Plan, the Commission will be accountable for achieving the following key objectives and their respective outcomes:

1. More Effective Reportage, Investigation and Prosecution of Corruption Cases
Outcomes
 - 1.1 Increased Reporting of Corruption Cases by the Citizens
 - 1.2 Improved Investigation and Prosecution of Cases
2. Reduction of System-Induced Corrupt Practices
Outcomes
 - 2.1 Improved mechanisms for Corruption Prevention in the Public Sector
 - 2.2 Increased Public Empowerment Against Corruption
3. Increased Managerial Effectiveness of ICPC
Outcome
 - 3.1 Improved ICPC Management Style and Culture

The linkage between these Objectives and Outcomes, and the Activities and Outputs of the functional units of the Commission is fleshed out in the M&E Operational Plan. This lays out the key activities and outputs that are necessary for the achievement of these higher-level outcomes and key objectives. The Commission is persuaded that the achievement of the above outcomes through the activities laid out in the M&E operational plan provides the key pillars for an effective and efficient ICPC. The activities and outputs in the M&E Matrix and Operational Plan will strengthen the internal processes and structures of the Commission; improve collaboration and coordination with relevant ACAs and remove constraints to the effective performance of the Commission's functional units.

While the Commission reports at the Impact and Outcome levels, each department/unit is expected to report against the Activities and Output level results under its purview on the M&E Operational Plan.

RESULTS FRAMEWORK



