



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

**STRATEGIC PLAN  
2019-2023**

# Glossary

ACs	-	Anti-Corruption Clubs
ACAs	-	Anti-Corruption Agencies
ACTU	-	Anti-Corruption and Transparency Monitoring Unit
AV	-	Anti-Corruption Vanguard
BMOs	-	Business Management Organizations
BPP	-	Bureau of Public Procurement
CCB	-	Code of Conduct Bureau
CEPT	-	Constituency and Executive Project Tracking
CEPTI	-	Constituency and Executive Project Tracking Initiative
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
J4A	-	Justice for All
KPI	-	Key Performance Indicator
LGII	-	Local Government Integrity Initiative
MDAs	-	Ministries Departments and Agencies
NACC	-	National Anti-Corruption Coalition
NACS	-	National Anti-Corruption Strategy
NASS	-	National Assembly
NAVC	-	National Anti-Corruption Volunteer Corp
NBS	-	National Bureau of Statistics
NEITI	-	Nigeria Extractive Industry Transparency Initiative
NERDC	-	Nigerian Educational Research and Development Council
NFIU	-	Nigerian Financial Intelligence Unit
PA's	-	Professional Associations
SAV	-	Students' Anti-corruption Vanguard
SCUML	-	Special Control Unit against Money Laundering
TBD	-	To Be Decided
TI	-	Transparency International
TUGAR	-	Technical Unit on Governance and Anti-Corruption Reforms
UNDP	-	United Nations Development Programme

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# ACKNOWLEDGEMENT

The Board of the Independent Corrupt Practices and Other Related Offences Commission (ICPC) sincerely acknowledge the effort of the Management and Staff of the Commission for the development of the 2019 - 2023 Strategic Plan.

The ICPC acknowledges the collaborative role played by our development partners during the planning process, especially the Rule of Law and Anti-Corruption (RoLAC) Programme of the British Council under the 11<sup>th</sup> European Union Development Fund. The Commission also acknowledges the efforts of other stakeholders including civil societies for their roles in supporting the Commission in the fight against corruption.



# FOREWORD

Following the end of the implementation of the ICPC Strategic Plan: 2013 – 2017, collaborative efforts were made in the development of a successor organizational strategy that will span through 2019 – 2023. After the inauguration of the 4<sup>th</sup> Board of the Commission on the 4<sup>th</sup> of February, 2019, it was evident that the Board needs a road map that will guide it through its tenure.

The Board after its inauguration immediately held a Retreat with the ICPC Management Staff on 12<sup>th</sup> and 13<sup>th</sup> of February 2019. The forum included the presentation of the Overview of the Draft ICPC Strategic Document: 2019 – 2023. The Board reviewed and made input into the Plan Document while Planning, Research and Review Department was mandated to get the Plan ready for the Board's approval. The commitment of the Board to the actualization of the plan's objectives led to the approval of the ICPC Strategic Plan: 2019 – 2023 by the Board at a Meeting held on 10th April, 2019.

This document provides a Five-Year Strategic Framework to guide the Commission in the onerous responsibility of delivering on its mandate. It is also adopted to meet the deliverables of ICPC as provided in the National Anti-Corruption Strategy (NACS): 2017 – 2021 workplan. The Result Framework will be used to judge the Commission's performance during plan implementation. The Commission expresses its gratitude to development partners who have contributed one way or the other to the finalization and production of this document, or the implementation of the Commission's mandate under the 4<sup>th</sup> Governing Board. These include the RoLAC Programme, MacArthur Foundation and the Ford Foundation. We hope that this synergy continues to grow with confidence.

It is therefore my earnest pleasure to present the 2019 – 2023 Strategic Plan of the Independent Corrupt Practices and Other Related Offences Commission (ICPC).

**Prof. Bolaji Owasanoye**

ICPC Chairman

May 2021

## 1. BACKGROUND

1.1 Strategic Plan plays important role in every organization which wants to be tactical in achieving set objectives over a specific period. This is so because strategic planning helps the organization develop the right goals and targets and help everyone focus their efforts in achieving them. Recognizing this importance, ICPC in June 2004 with the support of relevant stakeholders formulated its first Strategic Plan: 2004 – 2008. Alas, however, there was a wide chasm between the formulated strategy plan and the needed strategy plan implementation during the plan period. Without a doubt, the experience of the inaugural plan somehow guided the strategy formulation of the Strategic Plan: 2013 – 2017 and an agreed framework for its implementation.

1.2 The 2013 – 2017 Strategic Plan formulated in collaboration with the technical support of Justice for All (J4A) of the Department for International Development (DFID) was vigorously worked at. In conformity with M&E Framework, the ICPC in April 2017, had a Strategic Plan Implementation Retreat in Kaduna, Kaduna State where the Performance Scorecard from 2013 – 2016 was appraised. Considering the robust statistics presented at the Retreat, DFID and other notable stakeholders in attendance comparatively adjudged the plan performance under review a success amidst challenges that affected the Plan Implementation.

1.3 In resolute for a successive (current) strategic plan formulation, the ICPC collaborated with the Rule of Law and Anti-Corruption (RoLAC) Programme of the British Council to organize a Three-Day Management Workshop on the Development of Organizational Strategy for the ICPC in November 2018 at Abuja. The Workshop reviewed the ICPC experience and lessons learnt from the immediate past strategy implementation while formulating the new Strategy. The workshop also highlighted the need for the Change Management Committee to steer the plan implementation and align the new strategy of the ICPC to the objectives of the National Anti-Corruption Strategy (NACS): 2017 – 2021.

## 2. The Independent Corrupt Practices and Other Related Offences Commission (ICPC)

### 2.1 Establishment

The ICPC was established with the enactment of the Corrupt Practices and Other Related Offences Act, 2000,<sup>1</sup> when the Establishment Bill was signed into law by Nigeria's former President, Chief Olusegun Obasanjo on the 13<sup>th</sup> June 2000. Subsequently, the Commission was inaugurated on the 29<sup>th</sup> of September same year.

The primary mandate of the Commission as encapsulated in section 6 of the Act, 2000, is enforcement through investigation and prosecution; prevention through system study and review and corruption risk assessment; and public education through enlisting and fostering public support in combating corruption.

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.

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



## 2.2 Legislation

The Act is made up of 71 Sections:

Section 1	cites the Act
Section 2	interpretation of 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 Anti-Corruption and Financial Crimes, and the House of Representatives Committee on Anti-Corruption.

## 2.4 Structure of the Commission

The Act provides that the Board of the Commission shall consist of a Chairman and twelve (12)<sup>2</sup> 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 Act also provides for a Secretary, who shall be appointed by the President, and shall function under the general direction of the Chairman and shall be responsible for keeping the records of the Commission as well as the general administration and control of the staff of the Commission.

Meanwhile, the current composition of the Board as inaugurated by President Muhammadu Buhari on 4<sup>th</sup> February 2019 consists of the Chairman, 8 Members of the Board with diverse experience and a Secretary. 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 operational duties and execution of policies are carried out by 10 departments and 6 units namely:

### Departments

1. Operations Department
2. Legal Services Department
3. Planning, Research and Statistics (PRS) Department
4. Public Enlightenment and Education (PEE) Department
5. Special Services Department (SSD)
6. System Study and Review (SSR) Department
7. Administration and Human Resources Department
8. Finance and Accounts Department
9. Anti-Corruption Academy of Nigeria (ACAN) Department
10. Assets Tracing, Recovery and Management (ATRM) Department

### Units

1. Reform Unit
2. Protocol Unit
3. Procurement Unit
4. Clinic Unit
5. Audit Unit
6. Internal Security and Support Unit (ISSU)

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<sup>2</sup>Section 3(3) of the Act



## ICPC Academy

ICPC has a training arm, the Anti-Corruption Academy of Nigeria (ACAN), situated at Keffi in Nassarawa State. It has the mandate of developing the capacity of staff to function optimally, as well as provide specialized training for public officers and the general public on issues bordering on good governance, accountability, transparency, integrity, ethics and others that would contribute to ridding the country of corruption.

## Locations

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. Presently, ICPC has offices in fifteen (15) states of the federation while the total staff strength is seven hundred and seventy-seven (777).

## 3. Legal and Institutional Measure on Anti-Corruption Work in Nigeria

### 3.1 Previous Initiatives

Before to the establishment of ICPC, the Federal Government of Nigeria at various times, initiated several anti-corruption programmes. 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). Probably due to partly frequent change of government and in most cases lack affirmative political will and commitment, these initiatives could not bring about the needed anti-corruption drive.

However, with the gale of public service reforms sweeping across Africa in the first decade of the 21<sup>st</sup> century Nigeria could not afford the luxury of being left behind. To this effect and considering the consequences of corruption on nation building, the fourth republic beginning from 29<sup>th</sup> May 1999, was convinced and confident that robust anti-corruption legislation is the next logical step to take. Thus, the hearing on the first Bill presented by the former President, Chief Olusegun Obasanjo to the National Assembly was given the speed it deserved. The Bill was passed by National Assembly and signed into law on 13<sup>th</sup> June 2000 as the Corrupt Practices and Other Related Offences Act, 2000. The National Assembly has passed other legislation to enhance and sustain the fight against corruption in Nigeria. Notwithstanding the passage of these legislations, major challenges still exist in the enforcement of the rule of law and ensuring effective accountability.

### 3.2 Anti-Corruption Institutional Framework

There were statutory anti-corruption institutional frameworks in existence before the enactment of the Corrupt Practices and Other Related Offences Act, 2000. The 1999 Constitution as amended, established the Code of Conduct Bureau and Code of Conduct Tribunal. While the former is empowered to receive complaints and investigate the same, and where there are cases of violations by public officers, the cases are referred to the latter for adjudication.

The subsequent anti-corruption institutional frameworks were the Act of Parliaments created to add value and vigour to the anti-corruption crusade in Nigeria. They include the Corrupt Practices and Other Related Offences Act, 2000 which established ICPC to enforce, prevent, and foster public support against corruption; the Economic and Financial Crimes Act, 2002 which established the Economic and Financial Crimes Commission (EFCC) to enforce laws on economic and financial crimes; the Bureau of Public Procurement Act, 2007 established Bureau of Public Procurement (BPP) to provide the legal and regulatory framework for procurement in Nigeria; the Nigeria Extractive Industry Transparency Initiative (NEITI) Act, 2007 established Nigeria Extractive Industry Transparency Initiative to ensure due process and transparency in the payment made by all extractive industries to the federal government, and the Money Laundering Act, 2012 (amended).

The Nigeria Financial Intelligence Unit (NFIU) through the emergence of the NFIU Act, 2018 is now an autonomous unit domiciled with the Central Bank of Nigeria. NFIU is established to institutionalize best practices in the management of financial intelligence in Nigeria and to strengthen the existing system for combating money laundering and associate predicate offences. The Special Control Unit against Money Laundering (SCUML) was also created to support the efforts of the government to combat money laundering and terrorist financing.

In addition, Administrative Units like the Budget Office of the Federation, Technical Unit on Governance and Anti-corruption Reforms (TUGAR), Inter-Agency Task Team (IATT), Presidential Advisory Committee Against Corruption (PACAC), etc, were established to coordinate, monitor and evaluate anti-corruption and other governance initiatives. With the adoption of the NACS, the Federal Ministry of Justice under the leadership of the Attorney-General of the Federation (AGF) will be the coordinating authority that will monitor the implementation of the National Anti-Corruption Strategy (NACS) work plan at the Federal level, while the Attorney-General of the State (AGS) is charged with the responsibility of monitoring the implementation of NACS at State and Local Government levels.



## **4. FRAMEWORK OF THE ICPC STRATEGY**

### **4.1 Underlying Reasons for the Strategy**

A Strategic Plan is like a roadmap, clearly defining the best route for the organization to take in the years ahead. Whether it covers a short or medium or long-term period, it can help to guide the organization to meet the challenges that lie in the future. Therefore, looking to the future today entails deliberate planning - strategy formulation and implementation to the realization of anticipated goals consistent with set targets. Strategic Planning is a documented organizational management process used to analyse the current situation, set priorities and focus resources and energy to achieve them.

The underlying basis for the ICPC Strategic Plan is to have a comprehensible strategy that will provide the Commission with a sense of direction and sharpen its focus to get to its desired destination. As a feasible guide on the journey to the future, the strategic plan is anticipated to adequately respond to the underlying purpose of the Commission through its compelling future, collective commitments, delivering its targets within the stipulated timelines, and performance evaluation.

Through the strategic plan, the ICPC aims to assess its current position, establishes its purposes and set priorities, defines the methodology of achieving them, earmarks resources without losing focus on strategic priority areas, and meticulously observe the realization of goals.

### **4.2 Scope of the Strategy**

As the immediate precursor, the Strategy is a five-year medium-term plan seeking to transform the Commission into a professional anti-corruption organization. The subject scope includes the review of the ICPC and its internal capacity, operational procedures, strategy execution for value-added performance and established goals, delivery of NACS objectives and the broad progress of the ICPC in all aspects of its operations.

### **4.3 The Process of Developing the Strategy**

The process of developing the strategy commenced with an organisational assessment of the performance of the last strategic plan. The Strategy was developed at a three-day workshop organized for the officers of the ICPC from the Head Office and State Offices by RoLAC in Abuja. The process involves the review of ICPC Strategic Plan: 2013 - 2017, building the Vision, Mission and Strategic Objectives, building result framework, identification of the strategic activities (which involve the inclusion of outstanding activities in the last strategy), review of NACS Workplan: 2017 - 2021 to align ICPC Strategy with the NACS Strategy and development of M&E operational framework for effective implementation.

A Technical Committee that will take the work of the workshop into an implementation phase was also set up. The outcome of the workshop was harmonized and presented to the Committee who further enriched the report. The Strategic Plan Document was drafted by ICPC staff. The developmental process will also involve having effective institutional mechanisms in place for strategy finalisation, communication and implementation.



## 5. STRATEGIC REVIEW OF THE ICPC

### 5.1 External Environment

Generally, they are external and internal circumstances that have bearing on the mandates of organizations, and the ICPC is no exception. This unavoidable reality is made more evident when there is a deluge of challenges occurring in more complex forms than are ever imagined. Thus, to be hopeful of organizational effectiveness, strategic planners and managers will have to structure their plans to adapt to the fluctuating environment to make the best out of them.

Evidently, with the increasing inter-connectedness of global social, economic, political, and technological relations, the phenomenon of corruption including transborder crimes impact negatively on the development of all countries. The reality of the consequences of corruption like poor governance, economic under-development, and the concomitant poverty, high unemployment, youth restiveness and insecurity severely impact law enforcement efforts globally. Also, technologically inspired money laundering involving state and non-state actors has been linked to terrorism financing that is today threatening human and physical securities that are internal and external to nation-states.

As a nation, the ICPC has the mandate to curb the country of the devastating effect of corruption. As a premier anti-corruption agency with the three-prong mandate of law enforcement, prevention, and public education and mobilization against corruption, wrestling down corruption and its adverse indicators has since been a top priority. Notwithstanding the challenges, the ICPC in its modest efforts has without mention made some achievements in the three-layered mandate. In the area of enforcement, the Commission has made some fair achievements. In the area of prevention, the Commission conducted scores of Systems Study and Review and Corruption Risk Assessment (CRA) in the critical sectors of the Nigerian political economy. The primary goal of this prevention approach is to identify corruption vulnerabilities, risks, abuse of processes and opportunities that facilitate corruption and plug them from the systems to avoid corruption from manifesting. Against this backdrop, many public institutions in Nigeria have been made stronger for service delivery. On account of the efficacy of CRA, Nigeria through the ICPC conducted CRA capacity building training for Heads of Anti-Corruption Agencies in African Union countries in December 2018.

The Commission also carries out public education and mobilization to enlighten and enlist the support of the public on the danger of corruption. There is no doubt that these efforts have helped in no small measure in creating broad consciousness and of course increasing participation in the programmes of the Commission like the NAVC, etc.

In all of these efforts, the task ahead is daunting; however, the Commission has remained unwavering and undaunted. There is still much work to be done in the task of combating corruption. To resolve these challenges, steps have been taken to carry out the analysis of strengths, weaknesses, opportunities and threats to the Commission.

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

EXTERNAL ORIGIN (Attributes of the environment)	INTERNAL ORIGIN (Attributes of the organization)
<p><b>OPPORTUNITIES</b></p> <ul style="list-style-type: none"> <li>• Outreach Programmes of the Commission through NAVC, NACC, etc.</li> <li>• Partnership with International Partners: UNODC, RoLAC, etc.</li> <li>• Liaising with other ACAs for effective combat of corruption.</li> <li>• Utilising the Presidential Executive Order No. 6, 2018 on seizure and forfeiture of proceeds of corruption.</li> <li>• More collaboration with BPP, NFIU, FIRS, etc.</li> <li>• Exploring the FOI Act; FRA, PPA, etc.</li> <li>• Collaboration with donor agencies and other institutions to train and retrain staff on relevant skills.</li> <li>• Partnership with Auditor-General.</li> </ul>	<p><b>STRENGTHS</b></p> <ul style="list-style-type: none"> <li>• The major strength of the Commission is the ICPC Act 2000, which is very comprehensive and robust and meets most of the requirements of UNCAC – Enforcement, Prevention and Public Engagement (ICPC Act 2000).</li> <li>✓ Enforcement mandate of the Commission – s 6 (a); Special investigative and prosecutorial powers in the Act.</li> <li>✓ Prevention mandate of the Commission – s 6 (b-d); Power to conduct System Study and Review and Corruption Risk Assessments of MDAs.</li> <li>✓ Public Enlightenment and Education – s 6 (e-f); Campaign through various groups: NAVC, ACTUs, NACCs, Clubs, Vanguarders, NYSC CDS groups, etc.</li> </ul>
<p><b>THREATS</b></p>	<p><b>WEAKNESSES</b></p>
<ul style="list-style-type: none"> <li>• Political interference in the conduct of cases involving politically exposed persons (PEPs).</li> <li>• Inadequate funding affects implementation of the Commission's mandate.</li> <li>• Delay in amendment of the ICPC Act.</li> <li>• Social value system that encourages corruption.</li> <li>• Challenges to the ICPC Act Jurisdiction and the Attorney-General nolle prosequi.</li> <li>• Slow Judicial Process.</li> <li>• Mergers and Scrapings threat.</li> <li>• Inter-agency Rivalry/usurpation of mandate.</li> <li>• Security Threat to Personnel.</li> </ul>	<ul style="list-style-type: none"> <li>• Inadequate personnel with about 800 staff and only 15 state offices across the nation.</li> <li>• Insufficient training and retraining for staff.</li> <li>• No timelines for Petitions treatment.</li> <li>• Poor commitment to investigation of non-petition intelligence led cases.</li> <li>• Poor Staff Morale because of conditions of service and Retirement package after service.</li> <li>• Centralised Operational Structure: Lack of autonomy for state offices and too many lines of reporting.</li> <li>• Absence of standardize recruitment process and code of conduct for staff.</li> </ul>



### 5.3 Stakeholders Analysis

The Stakeholders are identified to include the following:

1. ICPC Staff
2. CSOs
3. NASS
4. Other ACAs
5. Bureau of Public Procurement
6. Judiciary
7. Ministry of Justice
8. Ministry of Finance
9. Budget Office
10. Office of the Auditor-General for the Federation
11. National Bureau of Statistics, etc.

The Stakeholders Analysis presented in the Four Quadrant Matrix as follows:

<b>HIGH</b>	<b>Quadrant 2</b> Address concerns <ol style="list-style-type: none"> <li>1. BPP</li> <li>2. Ministry of Finance</li> <li>3. Ministry of Justice</li> <li>4. Budget Office</li> <li>5. OAGF</li> </ol>	<b>Quadrant 4</b> Priority Area for Stakeholder Management <ol style="list-style-type: none"> <li>1. NASS</li> <li>2. Judiciary</li> <li>3. Presidency</li> </ol>
	<b>LOW</b>	<b>Quadrant 1</b> Keep informed <ol style="list-style-type: none"> <li>1. Media</li> <li>2. ACTUs</li> <li>3. NAVC</li> <li>4. NACC</li> <li>5. Students Integrity Clubs, etc.</li> </ol>
	<b>LOW</b>	<b>HIGH</b>



**NOTE:**

- Quadrant 1 consists of the Low-Low Level stakeholders which the Commission keeps informed of its activities.
- Quadrant 2 are the High-Low Level stakeholders which address the concerns of the Commission; hence, they are very important to the Commission.
- Meanwhile, the Low-High Level stakeholders that get partially involved in the activities of the Commission are contained in Quadrant 3.
- Quadrant 4 are the most priority stakeholders within the High-High Level with the highest stake in the Commission.

**5.4 The Challenges**

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

**5.4.1 Internal Challenges**

Primarily, the internal challenges are discussed as follows:

- Inadequate professional staff to execute the functions of the Commission: Obviously, the activities of the Commission requires a large number of professionals with requisite skills but these professionals like psychologists, accountants, lawyers, criminologists, forensic experts, quantity surveyors, etc, are not adequately represented in the Commission's workforce. Moreover, the Commission's staff strength of 777 cannot cover the population of over 180 million Nigerians.
- The non-constitution of the case management committee to set-up internal mechanisms for the identification of potential cases and procedures for selection, investigation and prosecution of the case including the intelligence led investigation, is a serious challenge to the Commission. There are no timelines for petitions treatment.
- Lack of coherent alignment of the State Offices activities with the performance evaluation of Strategic Plan. In the area of target setting in the past strategy, State Offices were conspicuously ignored and hence, they were not given adequate resources to function effectively.
- Poor commitment to the investigation of non-petition intelligence led cases and the inability of the Commission to explore the provision of the Act on 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 only fifteen state offices that do not cover the federation as stipulated in the Act.

- Inadequate disciplinary actions against the erring officers and poor work ethics among the staff of the Commission pose a measure of challenges to the Commission.
- Poor internal information management exists among departments and units as important information gets to end users late.
- Over-dependence on petitions inhibits the Commission from acting pro-actively in its enforcement duties.
- 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.
- Though the Commission has established 427 ACTUs across the nation, funding and operational independence have been a challenge to the fulfilment of their mandate. Also, the loyalty of staff of MDAs in charge of various ACTUs when dealing with anti-corruption compliance issues in their organizations poses a challenge to the effective delivery of their duties.

#### 5.4.2 External Challenges

- Political interference in the conduct of cases involving politically exposed persons (PEPs).
- 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, CRAs, education and enlightenment of over one hundred and sixty million Nigerians.
- Delay in amendment of the ICPC Act. Limitation of the Act in terms of its noted deficiencies and unwieldy Board membership of the Commission slows down the decision making process.
- Challenges to the ICPC Act Jurisdiction and the Attorney-General nolle prosequi on Commission's cases impede the work of the Commission.
- Slow Judicial Process in the adjudication of corruption cases is a major impediment in the fight against corruption.
- Security Threat to Personnel: There is a need to arm the staff of the Commission, as they are exposed to security risks of attacks by suspects and criminals in the course of their assignments.
- The value system that encourages corruption. Societal tolerance for and citizens' apathy to combating corruption constitute an impediment.
- The threat of mergers and scraping affect the morale of staff.



## 6. Risk Assessment

	Assumptions and Risk	Impact and Risk Management
i.	<p><b>Assumption:</b> It is assumed that the government will make increased budgetary provision to enable the ICPC improve its operations.</p> <p><b>Risk:</b> 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><b>Impact:</b> Incomplete implementation of the strategic plan would impact negatively on the performance of the Commission.</p> <p><b>Risk management:</b> Plans should be realistic and emphasis placed on cost-effectiveness and increased efficiency.</p>
ii.	<p><b>Assumption:</b> The implementation of ACJA will address the challenges affecting delay in the trial of cases.</p> <p>Government will pass legislations for the protection of witnesses and whistle blowers.</p> <p><b>Risk:</b> Delay in the trial of cases transmits wrong signals to citizens giving the impression that people are not punished for corruption.</p>	<p><b>Impact:</b> 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><b>Risk management:</b> Ensure close collaboration with the judiciary, the Nigerian Bar Association and the National Assembly.</p>
iii.	<p><b>Assumption:</b> There will be no political interference especially in cases involving Politically Exposed Persons (PEPs) and government will adopt zero tolerance stance in the fight against corruption and observe the rule of law.</p> <p><b>Risk:</b> Without observing the rule of law, the Anti-Corruption campaign will fail.</p>	<p><b>Impact:</b> Selective enforcement of the anti-corruption laws may make the people see the anti-corruption campaign as charade.</p> <p><b>Risk management:</b> Ensure enforcement of the ICPC mandate and observance of the rule of law.</p>
iv.	<p><b>Assumption:</b> Operational effectiveness will not be impaired by the existence of a number of ACAs with similar mandates.</p> <p><b>Risk:</b> 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><b>Impact:</b> Overlapping of functions will reduce operational effectiveness and public support for ACAs.</p> <p><b>Risk management:</b> Each ACA should focus on its area of strength and be proactive in inter-agency cooperation.</p>
v.	<p><b>Assumption:</b> The enthronement of ethics in Nigerian society and revival of traditional values will enhance the quest for a corruption-free Nigeria.</p>	<p><b>Impact:</b> Distorted value system which glorifies ill-gotten wealth as well as ethnic and religious differences will aid corruption,</p>



	<p><b>Risk:</b> The continued erosion of ethics and values in the society will make the efforts to fight corruption more difficult.</p>	<p><b>Risk management:</b> Ethics and values should be promoted in the society through public education, enlightenment and mobilization.</p>
vi.	<p><b>Assumption:</b> The deployment of relevant technology will enhance the Commission's performance.</p> <p><b>Risk:</b> Failure to deploy technology will impact negatively on the performance of the ICPC.</p>	<p><b>Impact:</b> Technology has often been used wrongly to perpetrate corruption.</p> <p><b>Risk management:</b> Need to constantly update ICT infrastructure and build staff capacity to adapt to technological changes.</p>
vii.	<p><b>Assumption:</b> The amendment of the Act by the National Assembly will make the Commission more proactive and effective.</p> <p><b>Risk:</b> Putting the blame on the existing law will only divert the Commission's attention from its duties.</p>	<p><b>Impact:</b> Some of the provisions of the Act have not been fully explored.</p> <p><b>Risk management:</b> Need to interpret the Act positively and allow the courts to decide on contentious areas.</p>
viii.	<p><b>Assumption:</b> The integrity of staff will enhance ICPC's credibility and acceptability by Nigerians.</p> <p><b>Risk:</b> The Commission will lose its integrity if its staff are perceived to be corrupt.</p>	<p><b>Impact:</b> Confidence in the Commission is determined by the integrity of its staff.</p> <p><b>Risk management:</b> 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

After a thorough review, the Commission still retain its Vision, Mission and Core Values in order to effectively deliver its three core mandates of Enforcement, Prevention and Public Education and Mobilization.

### 7.2 ICPC's Vision, Mission and Values

The ICPC vision encapsulates the aspirational ambition the Commission looks forward to in the long and short term. 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.

**VALUES:** 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 is still adopted to facilitate recall.

##### **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

Annexures 1, 2 and 3 contain the full **Results Framework, ICPC Performance Monitoring Matrix and ICPC M&E Operational Plan respectively** that support this Strategic Plan.

The key objectives derive from the vision and mission statements 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 (See Annexures 1, 2 and 3 at pages 27, 28 and 41 respectively for details). 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 and improved mobilization of the citizenry to fight corruption
- 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)

- Enhanced safe reporting and feedback mechanisms introduced
- Increased and 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 pre-set 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
- Proactively enhance the legal and enforcement processes on the fight against corruption

## Performance measures

These are as follows:

- Value of assets forfeited/recovered/restrained
- Number of investigated cases concluded
- Number of Cases filed for Prosecution
- Number of convictions secured
- Number of projects tracked under the CEPT Initiative
- Number of new petitions received through ICPC-established channels
- Number of petitions that met case tracking standards of acknowledgement, investigation and completion
- Duration between receipt of petitions and conclusion of investigation
- Duration between conclusion of investigation and filing of cases
- Number of staff trained in investigation, prosecution and case management
- Number of non-petition intelligence-led investigations conducted

### Strategic Objective 2: Reduction of System-Induced Corrupt Practices and improved mobilization of the citizenry to fight corruption

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 and corruption risk assessments (CRAs) 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 on the fight against corruption
- Increased partnership with ACAs and other accountability institutions for a coordinated impact on the fight against corruption
- Reporting format for all ACTUs deployed and enforced.
- Increased partnership with OHCSF for a coordinated impact on the fight against corruption
- Strengthened capacity of the ACTUs
- Increased partnership with States and Local Governments at the sub-national level to mainstream anti-corruption activities
- Improved awareness and knowledge of the scourge of corruption in schools and public institutions
- Strengthened institutional framework to combat corruption
- Completed Integrity Compliance Scorecard to assess MDAs' risk vulnerability

## Performance measures

These measures are as follows:

- Number of MDAs that are assessed for compliance under Systems Studies and CRAs
- Number of MDAs that make progress in compliance with the Systems Studies and CRAs recommendations
- Number of corruption monitoring activities undertaken by ICPC
- Number of MDAs assessed with Ethics and Compliance Scorecard
- Number of anti-corruption activities undertaken by ICPC-supported CSO platforms
- Number of Hits and feedback on ICPC website and other communication platforms
- Number of sensitization sessions conducted by ICPC
- Number of anti-corruption clubs and vanguards formed
- Number of individuals trained by ACAN.

## 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

1. Improved ICPC Management Effectiveness, Style and Culture



### Outpost (Specific planned deliverable)

- More effective and objective system for employees' performance evaluation
- Improved ICPC work quality and reduced bureaucracy
- Improved system for internal communications
- Developed systems of "How tos" (Operational Processes/Manuals) for key operational processes like reports, memos and meetings
- Enhanced 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 to meet the development needs of the Commission
- Evaluation of progress in plan implementation undertaken on a periodic basis

### Performance measures

These are as follows:

- Annual Staff Scorecard on Management Performance
- Annual Unqualified Audit of ICPC by External Auditors
- Number of partnership actions/initiatives taken in collaboration with other ACAs
- Number of Quarterly reports responded to and considered by the Chairman/Board.

## 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 help track the progress of plan and makes 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 is a sine qua non for the successful implementation of any strategies and related action plan. It involves the tools and processes that will be used to measure if the programmes/projects are being implemented according to the plan and whether the desired results are being achieved. M & E plan will always be a reference point that provides guidance for the performance management and constant overview of deliverables for the Board of ICPC. It will also help to track and measure indicators over time as well as reporting on progress of the plan implementation. The key to successful strategic planning is to build in measures and implementation steps that allow you to engage staff and monitor the results at regular intervals.

The M& E plan has three (3) components namely: the results framework; the performance monitoring matrix and M & E operational plan. The results framework sets out the key performance indicators upon which the plan would be assessed. It depicts the causal linkage

between the mission, the objectives and expected impact on the Commission. Performance Monitoring Matrix has two components: the part that contains the summary and another that contains the detail. Part one of the performance monitoring matrix contains the responsible departments and units for each of the key performance indicators as well as the aggregate targets for the five-year period, while the part two of the performance monitoring matrix details the key performance indicators for each level of expected result, defines the indicators to be used and the unit of measurement as well as the source of collection of data and set targets for the plan period. The M & E operational plan shows the linkage that connects the planned objectives, outcomes, outputs and key activities required to achieve the objectives as well as the Commission's functional units responsible for achievement of the results.

Periodic and systematic reporting on activities in the plan should be well coordinated and continuously reviewed to ensure that the strategies remain relevant at all times. In order to ensure effective delivery of the planned objectives, the progress report of strategic plan implementation should be prepared on quarterly, half-yearly and annual basis. There may be need for exceptional reporting to the chairman/board of ICPC where necessary to give account of progress achieved on implementation and where there are challenges, decisions should be made to deal with hindrances. Quarterly meetings will be held where the progress report should be conveyed via a Dashboard to the relevant reporting departments and units and challenges identified addressed.

The M & E planning framework will remain a constant reference plan for all the operational units through the life span of the strategy and will continue to provide useful managerial resource for the delivery of the plan.

### **The ICPC Result Logic**

The ICPC retains its mission "to rid Nigeria of all forms of corruption through Lawful Enforcement and Preventive Measures". Meanwhile, 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 and improved mobilization of the citizenry to fight corruption
  - 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

#### **Outcomes**

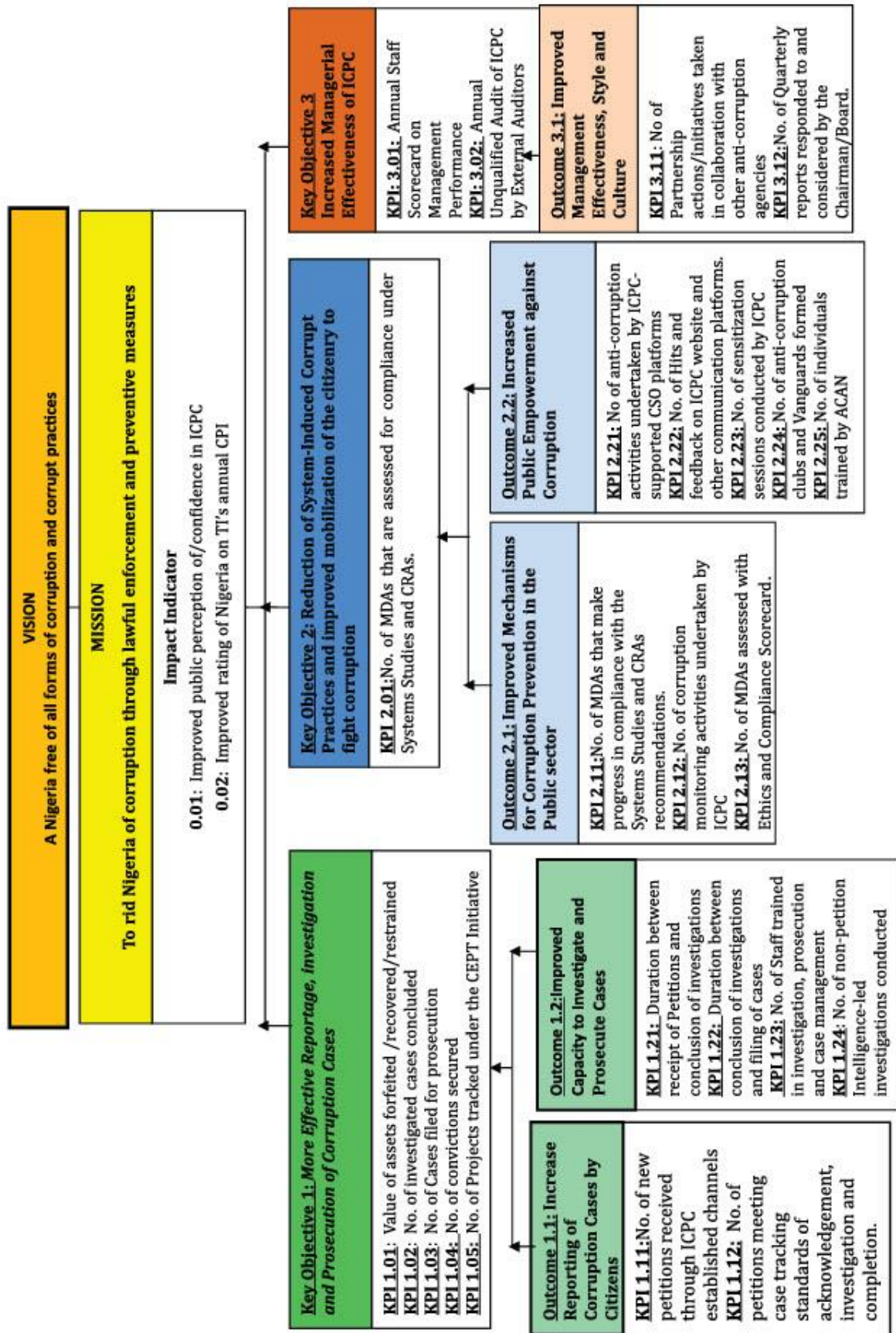
#### 3.1 Improved ICPC Management Effectiveness, Style and Culture

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 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.



**ANNEX 1: RESULTS FRAMEWORK**



## ANNEX 2A: ICPC PERFORMANCE MONITORING MATRIX (Summary)

S/NO.	KPI No./Measure	Responsible Dept/Unit for KPI	Baseline 2018	Set-Target for 2019	Set-Target over 5 Years 2019 - 2023	Remarks
1	KPI 1.01: Naira value of assets forfeited /recovered/restrained	Operations Department, Legal Services Dept., State Offices	N18b	N15b	N112b	20% increase annually
2	KPI 1.02: No. of investigated cases concluded	Operations Department, State Offices	501	960	7,144	20% increase annually
3	KPI 1.03: No. of cases filed in court for prosecution	Legal Services Dept., State Offices	45	80	500	Increase by 10 cases annually
4	KPI 1.04: No. of convictions secured	Legal Services Dept., State Offices	24	30	200	Increase by 5 annually
5	KPI 1.05: No. of Projects tracked under the CEPT Initiative	Operations Department (CEPTD), State Offices	New	400	2,976	Increase by 20% annually
6	KPI 1.11: No of new petitions received through ICPC established channels	SSD (Petition Registry), PEE (Public Enlightenment) and State Offices	1,653	2,040	15,181	Increase by 20% annually
7	KPI 1.12: No. of petitions met case tracking standards of acknowledgement, investigation and completion	Operations Department, SSD (Petition Registry) and Case Mgt. Committee	To be determined	2019 - 50% of Petitions to meet the standard	2019 - Set Standards 2020 - 70% standard met 2021 - 80% standard met 2022 - 90% standard met 2023 - 100% standard met	
8	KPI 1.21: Duration between receipt of petitions and conclusion of investigations	Operations Department, SSD (Petition Registry) and Case Mgt. Committee	120	60 days	60 days	Disaggregated



S/NO.	KPI No./Measure	Responsible Dept/Unit for KPI	Baseline 2018	Set-Target for 2019	Set-Target over 5 Years 2019 - 2023	Remarks
9	KPI 1.22: Duration between conclusion of investigations and filing of cases	Legal Services Dept., SSD (Petition Registry) and Case Mgt. Committee	60	30 days	30 days	Disaggregated
10	KPI 1.23: No. of staff trained in investigation, prosecution and case management	Admin./HR	197 staff	300 staff yearly	1,500 Trainings for Staff	
11	KPI 1.24: No of non-petition Intelligence-led investigation	Operations Department	New	400 Cases	2,976 Cases	20% increase annually
12	KPI 2.01: Number of MDAs that are assessed for compliance under system studies and corruption risk assessments (CRAs).	SSRD	16 MDAs	20 MDAs	149 MDAs	Increase by 20% annually
13	KPI 2.11: Number of MDAs that make progress in compliance with the System Studies and CRAs recommendations.	SSRD	New	12 MDAs	89 MDAs	Increase by 20% annually
14	KPI 2.14: Number of corruption monitoring activities undertaken by ICPC	SSRD	40 Monitoring Activities in MDAs	60 Monitoring Activities in MDAs	446 Monitoring Activities in MDAs	20% increase annually
15	KPI 2.15: Number of MDAs assessed with Ethics and Compliance Scorecard	SSRD	New	60 MDAs	446 MDAs	New (20% increase annually)
16	KPI 2.21: No. of anti-corruption activities undertaken by ICPC-supported CSO platforms	PEED (Education), State Offices	50	72	536	Changed (20% increase annually)
17	KPI 2.22: No of Hits and Feedbacks on ICPC websites and other communication platforms	PEED (Public Enlightenment)	643,821 hits	1,000,000 hits yearly	5,000,000 hits	



S/NO.	KPI No./Measure	Responsible Dept/Unit for KPI	Baseline 2018	Set-Target for 2019	Set-Target over 5 Years 2019 - 2023	Remarks
18	<b>KPI 2.23:</b> No of sensitization sessions conducted by ICPC	PEED, SSRD and State Offices	538	660	4,029	10% increase annually
19	<b>KPI 2.24:</b> No of anti-corruption clubs and vanguards formed	PEED (Education) and State Offices	164	220	1,343	10% increase annually
20	<b>KPI 2.25:</b> No. of individuals trained by ACAN	ACAN	3,432	3,500	26,046	New (20% increase annually)
21	<b>KPI 3.01:</b> Annual Staff Scorecard on management Performance	PRS Dept	New	50% of Index Score	2019 - 50% of Index Score 2020 - 60% of Index Score 2021 - 70% of Index Score 2022 - 80% of Index Score 2023 - 90% of Index Score	New
22	<b>KPI 3.02:</b> Annual Unqualified Audit of ICPC by External Auditors	Finance and Accounts Dept.	New	70%	2019 - 70% 2020 - 75% 2021 - 80% 2022 - 85% 2023 - 90%	New
23	<b>KPI 3.11:</b> No of partnership actions/initiatives with other ACAs	ECU, Investigative Depts./Units.	21	21	115	Increase by 1 annually
24	<b>KPI 3.12:</b> No. of Quarterly Reports responded to and considered by the Chairman/Board	Board Affairs	New	2 Quarterly Reports responded to	18 Quarterly Reports responded to	New

## ANNEX 2B: ICPC PERFORMANCE MONITORING MATRIX (In Detail)

VISION: A Nigeria free from all forms of Corruption and Corrupt Practices

MISSION: To Rid Nigeria of Corruption through Lawful Enforcement and Preventive Measures

Impact Indicator	Indicator Definition and Unit of Measurement	Data Source and Method	Collection Frequency	Baseline & Target	Comments (Data Justification, Assumptions, Constraints, etc.)
0.01-Improved public perception/confidence in the ICPC	<p><b>Definition:</b> This is the perception of the general public based on a national survey conducted across all states, utilising a valid sample of the population</p> <p><b>Unit of Measurement:</b> Percentage score based on the perception of the population</p>	Annual survey conducted by the ICPC in conjunction with the National Bureau of Statistics (NBS)	Annually	<p><b>Baseline:</b> TBD through baseline survey to be conducted in 2019, the beginning of the strategy implementation phase</p> <p><b>Target:</b> To be set after the 2019 survey</p>	This is an impact level of indicator and not for tracking by ICPC departments
0.02-Improved rating of Nigeria on TI's annual CPI	<p><b>Definition:</b> This is a simple review of Nigeria's position on the CPI of TI</p> <p><b>Unit of Measurement:</b> Position of Nigeria in TI's CPI</p>	The Annual Corruption perception	Annually	<p><b>Baseline:</b> 2018: 2.7</p> <p><b>Target:</b> 2019: 2.8 2020: 2.9 Increase by 0.1 annually</p>	This is an impact level of indicator and not for tracking by ICPC departments



Impact Indicator	Indicator Definition and Unit of Measurement	Data Source and Method	Collection Frequency	Baseline & Target	Comments (Data Justification, Assumptions, Constraints, etc.)
<b>Key Objective 1. More Effective Reportage, Investigation and Prosecution of Corruption Cases</b>					
<b>KPI 1.01:</b> Value of assets forfeited/recovered/restrained	<p><b>Definition:</b> This is the value (in Naira) of all assets recovered and restrained by ICPC in any given year</p> <p><b>Unit of Measurement:</b> Naira</p>	Desk review of ICPC records by ICPC	Quarterly	<p><b>Baseline:</b> N18b</p> <p><b>Target:</b> 2019 – N15b 20% increase yearly</p>	This is an ICPC-wide performance measure.
<b>KPI 1.02:</b> No. of investigated cases concluded	<p><b>Definition:</b> This is a count of corruption cases that were investigated, of which final reports were submitted to the Hon. Chairman or other ACAs. This also include projects tracked under the CEPTI, as they form part of the investigative efforts of ICPC.</p> <p><b>Unit of Measurement:</b> Count of investigated cases concluded</p>	Desk review of ICPC/court records by ICPC	Quarterly	<p><b>Baseline:</b> 2018 - 501</p> <p><b>Target:</b> 2019 - 960 20% increase yearly</p>	This measures the performance of ICPC on its responsibility to effectively conclude cases assigned for investigation. This depends on in-flow of petitions sent to ICPC.
<b>KPI 1.03:</b> No. of cases filed in court for prosecution	<p><b>Definition:</b> This is a count of corruption cases that were investigated and filed for prosecution in a law court of competent jurisdiction</p> <p><b>Unit of Measurement:</b> Count of cases filed for prosecution</p>	Desk review of ICPC/court records by ICPC	Quarterly	<p><b>Baseline:</b> 2018 - 45</p> <p><b>Target:</b> 2019 - 80 and increase by 10 Cases</p>	This is an ICPC-wide performance measure, depending on in-flow of investigated cases and efficiency of the process to file cases in court. This measure recognises

				annually	that the judicial system is independent and the ICPC cannot control the efficiency of the judicial process
<b>KPL 1.04:</b> No. of convictions secured	<b>Definition:</b> This is a count of corruption cases for which the ICPC secured conviction in the law courts. <b>Unit of Measurement:</b> Count of convictions secured	Desk review of ICPC/court records by ICPC	Quarterly	<b>Baseline:</b> 2018 - 24 <b>Target:</b> 2019 - 30 and increase by 5 annually	This will help ICPC to increase its efforts on sanctions and enforcement as its cardinal mandate, since the conviction of offenders will serve as deterrent for commission of corruption.
<b>KPL 1.05:</b> No. of Projects tracked under the CEPT Initiative	<b>Definition:</b> This is a count of projects tracked by ICPC under the Constituency and Executive Projects Tracking Initiative (CEPT). <b>Unit of Measurement:</b> Count of projects tracked under the CEPTI.	Desk review of ICPC records	Quarterly	<b>Baseline:</b> New <b>Target:</b> 2019 - 400 and increase by 20% annually	This will help ICPC to increase its efforts towards tracking of constituency and executive projects in order to ensure improvement of service delivery, good governance and value for money in the implementation of government projects.
<b>Outcome 1.1: Increased Reporting of Corruption Cases by Citizens</b>					
<b>KPL 1.11:</b> No. of new petitions received through ICPC-established channels	<b>Definition:</b> This is a count of petitions received through ICPC's various channels including ICPC website/emails and phone calls. <b>Unit of Measurement:</b> Number	Desk review of ICPC records	Quarterly	<b>Baseline:</b> 2018 - 1,653 <b>Target:</b> 2019 - 2,040 20% increase yearly	This indicator seeks to measure the extent to which ICPC is expanding the space and platform for public awareness and participation. It also reflects increasing public confidence in the ICPC



<p><b>KPI 1.1.2:</b> No. of petitions met case tracking standards of acknowledgement, investigation and completion</p>	<p><b>Definition:</b> This is a count of petition in the ICPC case management file/register received and official acknowledgement sent to the petitioner, and case status update given to the petitioner periodically.</p> <p><b>Unit of Measurement:</b> Number as shown in ICPC's records</p>	<p>Desk review of ICPC records by ICPC and development partners</p>	<p>Annually</p>	<p><b>Baseline:</b>TBD <b>Target:</b> 2019 - Standards to be set. 2020 - 70% of standard met 2021 - 100%</p>
<p><b>List of Departments/Units that contribute to the achievement of Outcomes and Objectives as well as their activities</b></p> <p><b>Operations, SSD, Prosecution, ATRMD:</b></p> <p><i>Advise on petitions for investigation;</i> <i>Advise on post investigation report (prima facie or no case) for prosecution or re-investigation;</i> <i>Drafting of charges in a timely manner and vetting of same for propriety;</i> <i>Expeditious arraignment of accused persons in court</i></p>				
<p><b>Outcome 1.2: Improved Capacity to Investigate Cases</b></p>				
<p><b>KPI 1.2.1:</b> Duration between receipt of petitions and conclusion of investigations</p>	<p><b>Definition:</b> This is a computation of the average length of time from the date of receipt of a petition to the date of submission of final report to the Hon. Chairman from a random sample of cases</p> <p><b>Unit of Measurement:</b> Number of Days</p>	<p>Desk review of ICPC records by ICPC</p>	<p>Bi-Annually</p>	<p><b>Baseline:</b> 2018 - 120 days <b>Target:</b> 2019 - 60 days</p>
<p><b>KPI 1.2.2:</b> Duration between conclusion of investigations and filing of cases</p>	<p><b>Definition:</b> This is a computation of the average length of time from the date of submission of final report to the Hon. Chairman to the date of official filing of charges in a law court from a random sample of cases</p> <p><b>Unit of Measurement:</b> Number of Days</p>	<p>Desk review of ICPC records by ICPC</p>	<p>Bi-Annually</p>	<p><b>Baseline:</b> 2018 - 60 days <b>Target:</b> 2019 - 30 days</p>
<p>Through this strategy, ICPC is expected to institute a system for speedy processing and investigation of cases</p> <p>ICPC is expected to institute a system for speedy processing of filing of investigated cases, of which prima facie has been established</p>				

<p><b>KPI 1.23:</b> No. of staff trained in investigation, prosecution and case management</p>	<p><b>Definition:</b> This is the number of staff that attend training programmes on investigation, prosecution and case management which are sponsored by ICPC or in collaboration with other agencies</p> <p><b>Unit of Measurement:</b> Number of persons as seen from the Training Unit's records</p>	<p>Desk review of ICPC records</p>	<p>Quarterly</p>	<p><b>Baseline:</b> 2018 - 197 staff</p> <p><b>Target:</b> 300 yearly</p>	<p>Under this strategy, ICPC is expected to set up a system for ensuring that all staff get trained at least once every 2 years</p>
<p><b>KPI 1.24:</b> No. of non-petition intelligence-led investigations</p>	<p><b>Definition:</b> This is the number of cases of corruption independently identified and investigated by ICPC that are not initiated through a petition. This will include projects tracked under the CEPTI, as they form part of the investigative efforts of ICPC.</p> <p><b>Unit of Measurement:</b> Number of cases</p>	<p>Desk review of ICPC records by ICPC</p>	<p>Quarterly</p>	<p><b>Baseline:</b> 2018 - New</p> <p><b>Target:</b> 2019 - 400 cases</p> <p>20% increase yearly</p>	<p>Through this indicator, ICPC is expected to be more proactive in identifying and investigating corruption cases. A petition may follow the initial efforts of ICPC but the cases are generated by ICPC intelligence work.</p>
<p><b>List of Departments/Units that contribute to the achievement of Outcomes and Objectives as well as their activities</b></p> <p><b>Operations, SSD, Prosecution, ATRMD and Administration</b></p> <p><i>Advise on petitions for investigation;</i></p> <p><i>Advise on post investigation report (prima facie or no case) for prosecution or re-investigation;</i></p> <p><i>Drafting of charges in a timely manner and vetting of same for propriety;</i></p> <p><i>Expeditions arraignment of accused persons in court</i></p> <p><i>Preparation and updating of training records</i></p>					



Impact Indicator	Indicator Definition and Unit of Measurement	Data Source and Method	Collection/Reporting Frequency	Baseline & Target	Comments
<b>Key Objective 2: Reduction of System-Induced Corrupt Practices and Improved mobilization of the citizenry to fight corruption</b>					
<b>KPI 2.01</b> Number of MDAs that are assessed for compliance under system studies and corruption risk assessments (CRAs)	<b>Definition:</b> This is the number of MDAs that have been assessed for compliance with integrity management system under system studies and review and corruption risk assessment methodologies  <b>Unit of Measurement:</b> Number of MDAs assessed annually	Desk review of ICPC records	Quarterly	<b>Baseline:</b> 16 <b>Target:</b> 2019 - 20 MDAs  20% increase yearly	Through this strategy, ICPC is expected to use its preventive mandate to identify corruption vulnerabilities in the MDAs and develop integrity systems that would plug the loopholes in their systems.
<b>Outcome 2.1: Improved Mechanisms for Corruption Prevention in the Public sector</b>					
<b>KPI 2.11:</b> Number of MDAs that make progress in compliance with the System Studies and CRAs recommendations.	<b>Definition:</b> This is number of MDAs that made progress with respect to the initial rating in the system studies and CRA scores after the follow-up review of the MDAs  <b>Unit of Measurement:</b> Number of MDAs that comply with the recommendations/integrity plan of the study	Annual MDA audit by ICPC	Quarterly	<b>Baseline:</b> New initiative <b>Target:</b> 2019 - 12 MDAs  20% increase yearly	This KPI implies that ICPC will actively pursue a process to support, encourage and if necessary, compel MDAs to comply with the recommendations of system studies and CRAs.
<b>KPI 2.12:</b> Number of corruption monitoring activities undertaken by ICPC	<b>Definition:</b> This is a count of corruption monitoring activities including monitoring of budget execution by MDAs undertaken by ICPC	Desk review of ICPC records by ICPC	Quarterly	<b>Baseline:</b> 2018 - 40 <b>Target:</b> 2019 - 60	This will entail monitoring of budget execution of selected MDAs to ascertain their compliance with the provisions of anti-corruption legislation

	<b>Unit of Measurement:</b> Number			20% increase yearly	and regulations.
<b>KPI 2.13:</b> Number of MDAs assessed with Ethics and Compliance Scorecard	<b>Definition:</b> This is a count of MDAs that are assessed and graded with the Ethics and Compliance Scorecard	Desk review of ICPC records by ICPC and development partners	Quarterly	<b>Baseline:</b> 2018 - New <b>Target:</b> 2019 - 60  20% increase yearly	ICPC is expected to assess MDAs with the Ethics and Compliance Scorecard to ascertain their performance in terms of criteria set on the Scorecard.
	<b>Unit of Measurement:</b> Number				
<b>Outcome 2.2: Increased Public Empowerment against Corruption</b>					
<b>KPI 2.21:</b> No. of anti-corruption activities undertaken by ICPC-supported CSO platforms	<b>Definition:</b> This is a count of independent anti-corruption activities by ICPC's CSO partners which are supported by ICPC. This may include but not limited to procurement oversight, training workshops, sensitizations, project implementation monitoring, media campaigns for increased accountability and budget tracking	Desk review of ICPC and concerned CSOs' records for validation	Quarterly	<b>Baseline:</b> 2018 - 50 <b>Target:</b> 2019 - 72  20% increase yearly	ICPC is expected to build the capacity of its CSO partners and also encourage them to take actions to support increased transparency and accountability.
<b>KPI 2.22:</b> No of hits and feedback on ICPC's website and other communication platforms	<b>Definition:</b> The frequency of hits on the ICPC website is an indication of the level of public awareness and desire to connect with the Commission. This is not limited to ICPC website but extends to the hits on other social media platforms used by ICPC for campaigns and enlightenment.	Visits on the website, comments and replies to invitations made through social media platforms	Quarterly	<b>Baseline:</b> 2018 - 643,821 hits <b>Target:</b> 2019 - 1million hits	By this indicator, it is expected that ICPC will set up a functional/interactive own-managed website for improved access by the public and for increased access to cutting edge resources for staff.
	<b>Unit of Measurement:</b> Number of hits as recorded on ICPC website				



<p><b>KPI 2.23:</b> No. of sensitization sessions conducted by ICPC</p>	<p><b>Definition:</b> Sensitization sessions would include workshops, conferences, seminars and paper presentation forums conducted by education department and others</p> <p><b>Unit of Measurement:</b> Number of such sessions and the feedback generated from surveys that could aid policy decision-making</p>	<p>Records of attendance at sessions and on-the-spot survey questionnaires administered</p>	<p>Quarterly</p>	<p><b>Baseline:</b> 2018 - 538</p> <p><b>Target:</b> 2019 - 660</p> <p>Increase by 10% yearly</p> <p>The impact would be measured by the feedback generated for policy input.</p>
<p><b>KPI 2.24:</b> No. of anti-corruption clubs and vanguards formed</p>	<p><b>Definition:</b> This refers to outreach/empowerment platforms formed by the Commission in primary and secondary schools, and tertiary institutions.</p> <p><b>Unit of Measurement:</b> Number of clubs and vanguards formed and rejuvenated</p>	<p>Approved work plan, inauguration reports and records of activities undertaken by the Clubs/Vanguards</p>	<p>Quarterly</p>	<p><b>Baseline:</b> 2018 - 164</p> <p><b>Target:</b> 2019 - 220</p> <p>Increase by 10% yearly</p> <p>This is a mechanism for catching them young and would be employed by the ICPC as a medium to infuse moral ethics on anti-corruption activities to pupils and students at various levels of education.</p>
<p><b>KPI 2.25:</b>No. of individuals trained by ACAN</p>	<p><b>Definition:</b> This is a count of individuals trained by the training arm of ICPC, Anti-Corruption Academy of Nigeria (ACAN).</p> <p><b>Unit of Measurement:</b> Number</p>	<p>Desk review of ACAN records by ICPC</p>	<p>Quarterly</p>	<p><b>Baseline:</b> 2018 - 3,432</p> <p><b>Target:</b> 2019 - 3,500</p> <p>Increase by 20% yearly</p> <p>The impact would be measured by the feedback generated for policy input.</p>
<p><b>List of Departments/Units that contribute to the achievement of the above</b></p>				
<p><b>Public Enlightenment&amp;Education, SSRD, Research and Documentation Unit and ACAN</b></p>				
<p><i>Coordination of activities of Coalition members, including facilitating their activities and monitoring of their adherence to the</i></p>				
<p><i>NACC MOU</i></p>				
<p><i>Organization and participation in awareness generating interactive workshops to empower the public on anti-corruption activities.</i></p>				

Impact Indicator	Indicator Definition and Unit of Measurement	Data Source and Method	Collection Frequency	Baseline & Target	Comments
<b>Key Objective 3: Increased Managerial Effectiveness of ICPC</b>					
<b>KPI 3.01: Annual Staff Scorecard on management Performance</b>	<p><b>Definition:</b> This is ICPC's score on the performance of management staff of ICPC on general administration of staff. This will be scored annually through a survey that will be conducted on staff from Grade Level 14 and below with exception of HOUs.</p> <p><b>Unit of Measurement:</b> Percentage score on the index.</p>	Result of Questionnaire conducted by ICPC	Annually	<p><b>Baseline:</b> 2018 – New Initiative</p> <p><b>Target:</b> 2019 – 50% of Index Score. 2023 – 90% of Index Score.</p>	This will entail the assessment of management staff by their subordinates.
<b>KPI 3.02: Annual Unqualified Audit of ICPC by External Auditors</b>	<p><b>Definition:</b> This refers to the unqualified audit report of ICPC by the External Auditors. This will be scored annually after the conduct of external auditing of the financial records of ICPC. This will involve the review of management report on the audit and timely delivery of audit report on or before 30<sup>th</sup> June of the preceding year.</p> <p><b>Unit of Measurement:</b> Percentage score</p>	<p>Audited Statement and Management Reports. The scores are to be allotted as follows:</p> <ul style="list-style-type: none"> <li>- Unqualified Audit Report: <b>40%</b></li> <li>- Timely Auditing: <b>30%</b></li> <li>- Addressing of issues raised in the last Audit Report: <b>30%</b></li> </ul>	Annually	<p><b>Baseline:</b> 2018 – New Initiative</p> <p><b>Target:</b> 2019 - 70% 2020 - 75% 2021 - 80% 2022 - 85% 2023 - 90%</p>	Efforts would be made by ICPC to ensure that the number of issues raised on the management report on audit are reduced and improved upon when new audit is conducted as well as ensure timely delivery of audit reports.

<b>Outcome 3.1: Improved ICPC Management Effectiveness, Style and Culture</b>					
<b>KPI 3.11:</b> No of partnership actions/initiatives with other ACAs	<b>Definition:</b> Partnership actions here would include periodic coordination meetings resulting into concrete action of event, information/intelligence exchanges, collaboration in the use of facilities such as training facilities, peer review mechanisms, etc. <b>Unit of Measurement:</b> Number of actions/activities	Desk review of ICPC and other ACAs' records by development partners	Quarterly	<b>Baseline:</b> 2018 - 21 <b>Target:</b> 2019 - 21 2023 -25	This is a measure of collaboration and cooperation among ICPC, development partners and other ACAs.
<b>KPI 3.12:</b> No. of Quarterly Reports responded to and considered by the Chairman/Board.	<b>Definition:</b> This is a count of quarterly evaluation reports on implementation of the Strategic Plan considered by the Chairman/Board periodically. <b>Unit of Measurement:</b> Number	Desk review of ICPC records by ICPC	Bi-Annually	<b>Baseline:</b> 2018 - New Initiative <b>Target:</b> 2019 - 2 2020 -4 2023 - 4	This will ensure that issues raised on evaluation reports are promptly attended to and addressed by the Chairman/Board.
<b>List of Departments/Units that contribute to the achievement of the above Objective/Outcome and Indicators as well as their activities</b>	<b>PRS, Finance and Accounts, Administration, ECU, Operations and Chairman/Board</b>  <i>Introduce a more effective, rational and fairer evaluation system to evaluate performance of employees</i>  <i>Reduce bureaucracy and increase emphasis on work quality improvement;</i>  <i>Promptly address issues raised by External Auditors on Management Report and Audited Financial Statement;</i>  <i>Promptly address issues raised on the Evaluation Reports on Plan Implementation by the Chairman/Board;</i>  <i>Consciously take steps to enhance workers' morale, loyalty and commitment;</i>  <i>Streamline organisational structure</i>				



## ANNEX3: ICPC M&amp;E OPERATIONAL PLAN

VISION: A Nigeria Free from all forms of Corruption and Corrupt Practices				
MISSION: To Rid Nigeria of Corruption through Lawful Enforcement and Preventive Measures				
Result Area/Strategy Recommendation	Key Actions <i>(Outline the key steps/actions for implementing this recommendation)</i>	Responsible Dept./Unit	Timeline	Comments/Implementation Note
<b>Key Objective 1.1: More Effective Reportage, Investigation and Prosecution of Corruption Cases</b>				
<b>Outcome 1.1: Increased Reporting of Corruption Cases by Citizens</b>				
<b>Outputs and Activities:</b>				
<b>Output 1.1.1</b> Enhanced safe reporting and feedback mechanisms created and introduced	<b>1.1.1.1</b> Create safe reporting and feedback mechanisms for the stakeholders	PEE (Public Enlightenment)		ICPC is expected to set up an online portal for safe reporting and obtaining feedbacks for improved access and confidence by the public
<b>Output 1.1.2</b> Increased regular information to the public on actions taken by ICPC	<b>1.1.2.1</b> Review and implement a public communication strategy that ensure's proactive and regular communication via all mediums including print, broadcast and social media	PEE (Public Enlightenment)		Increased public information on the activities of ICPC is central to building public trust for increased reportage
<b>Output 1.1.3</b> Strengthened policy and systems to support increased reporting	<b>1.1.3.1</b> Review and communicate in-house whistle blower protection policy for confidence building	Legal Services		
	<b>1.1.3.2</b> Review procedures for the handling of all petitions including internal systems to ensure the confidentiality of reporting as well as case tracking, and operationalize it	SSD (Petition Registry)		

<b>Outcome 1.2: Improved Investigation and Prosecution of Cases</b>			
<b>Output 1.2.1</b> Enhanced capacity of investigators and prosecutors through onsite and offsite training and provision of appropriate work tools	<b>1.2.1.1</b> Develop and deliver regular/systematic needs -based training programmes	Admin	Undertake training needs identification as an essential starting point of this activity. ICPC may need to recruit experts in relevant fields to fill some gaps identified
	<b>1.2.1.2</b> Undertake a review of equipment need for investigation and prosecution and acquire them	Procurement	Surveillance and recording equipment, vehicles, etc.
	<b>1.2.2.3</b> Undertake training of investigators and prosecutors on handling of cases.	ACAN	
	<b>1.2.2.4</b> Undertake training of Lawyers on the Administration of Criminal Justice Act	ACAN	
<b>Output 1.2.2</b> Time-based case tracking system established and enforced	<b>1.2.2.1</b> Introduce e-petition registry and case tracking system to be integrated with case management system	SSD (Petition Registry)	
<b>Output 1.2.3</b> Periodic case review timelines established with pre-set performance objectives and targets	<b>1.2.3.1</b> Incorporate performance-based standards for the management of cases for investigation	Investigation	This is to be set up based on the historical understanding of the timelines and duration of cases by their types and complexities
	<b>1.2.3.2</b> Incorporate performance-based standards for the management of cases of prosecution	Legal Services	

<p><b>Output 1.2.4</b> Enhanced asset tracing, recovery and management</p>	<p><b>1.2.4.1</b> Review and implement procedures for asset tracing, recovery and management</p>	<p>Asset Tracing, Recovery and Management Department</p>	<p>Important to identify and address resource requirements and skills set as part of this review</p> <p>Develop departmental structures as experience on function grows, including the appointment of asset values and managers</p> <p>Important to establish mechanisms for calculating and recording assets seized and set annual performance targets for asset seizure/forfeiture and performance tracking as part of the procedures</p>
<p><b>Output 1.2.5</b> Increased enforcement of the provision of the Act for non-conviction-based asset forfeiture (civil recovery of assets)</p>	<p><b>1.2.4.2</b> Agree arrangements and protocols with ACAs and other relevant stakeholders for sharing specifically defined categories of information and network of contact on asset tracing and recovery</p> <p><b>1.2.5.1</b> Undertake training of investigators and prosecutors on asset forfeiture provisions and procedures</p> <p><b>1.2.5.2</b> Put in place internal mechanisms for the identification of potential cases and the procedures for selection, investigation and prosecution</p>	<p>Operations</p> <p>ACAN</p> <p>Case Management Committee</p>	<p>Specialist training and partnering with ACAs and in particular with NFIU may be required to strengthen this function. This is an important area of inter-agency cooperation with other ACAs</p> <p>With proper planning and effective implementation, this could make a major impact on the profile of ICPC. Case selection will be important. However, a proactive attitude will be required to get over current internal barriers</p> <p>Annual targets for civil recovery would focus on building aspect of ICPC operations</p>



<p><b>Output 1.2.6</b> Fully operational intelligence-led investigation with a significant yearly increase in cases filed in court</p>	<p><b>1.2.6.1</b> Operations Department to proactively initiate intelligence-led investigation with Chairman's approval</p> <p><b>1.2.6.2</b> Review and implement procedures for identification and handling of intelligence-led cases</p> <p><b>1.2.6.3</b> Set targets and timelines for the initiation and conduct of intelligence-led investigation and prosecution and put in place regular performance review mechanisms (to ensure that case management is conducted in a timely and effective manner)</p> <p><b>1.2.6.4</b> Review and operationalize procedures for general intelligence gathering and analysis</p>	<p>Operations</p> <p>Operations</p> <p>Case Management Committee</p> <p>Operations</p>	<p>Proactive gathering and use of intelligence will require a change in the operation of ICPC that has been petition-dependent and will require leadership to ensure that it operates effectively</p> <p>Operationalization of this function will require that funding arrangement be put in place. SDD repositioned to undertake this function</p> <p>Define scope of work to include interface with the NFIU, SCUML and CCB, and carry out general intelligence functions</p>
<p><b>Output 1.2.7</b> Proactively enhance the legal and enforcement processes on the fight against corruption</p>	<p><b>1.2.7.1</b> Enforce sanctions for MDAs that is in breach of compliance with establishment of ACTUs, ICPC's MDA Ethics and Compliance Scorecard, NACS, OGP, Freedom of Information requests, etc.</p>	<p>Management</p>	

Result Area/Strategy Recommendation	Key Actions (Outline the key steps/actions for implementing this recommendation)	Responsible Person	Timeline	Comments/ Implementation Note
<b>Key Objective 2: Reduction of System-Induced Corrupt Practices and improved mobilization of the citizenry to fight corruption</b>				
<b>Outcome 2.1: Improved Mechanisms for Corruption Prevention in the Public sector</b>				
<b>Output 2.1.1</b> Strengthened Systems and corruption risk assessments (CRAs) of MDAs to determine corruption-prone processes, procedures and policies; review same as well as direct and monitor compliance	2.1.1.1 Review the standard step-by-step procedural manual for conduct of systems study and review of MDAs and operationalize it	SSRD		
	2.1.1.2 Provide training on systems study methodology for staff with specific responsibilities for systems study	SSRD		
	2.1.1.3 Conduct system studies of MDAs incorporating integrity plan development and its implementation	SSRD		The systematic conduct of studies, development and implementation of integrity plan on the studied MDAs are necessary to give credibility to this function. ICPC has the legal powers to advise and where necessary, direct on specific corrective measures in MDAs.
	2.1.1.4 Carry out follow-up compliance review of the MDAs that were studied to ascertain compliance of recommendations.	SSRD		
	2.1.1.5 Conduct corruption risk assessments of MDAs incorporating integrity plan development and its implementation	SSRD		
<b>Output 2.1.2</b> Increased partnership with BMOs and PAs on the fight against corruption	2.1.2.1 Partner with BMOs and PAs on sensitization and mobilization for the fight against corruption	PEE (Education)		

<p><b>Output 2.1.3</b> Increased partnership with ACAs and other accountability institutions for a coordinated impact on the fight against corruption</p>	<p><b>2.1.3.1</b> Agree on mechanisms to share information and training opportunities with other ACAs and set up technology aided platform for sharing information</p> <p><b>2.1.3.2</b> Agree on mechanisms for collaboration with ACAs in key areas of investigation, prosecution, intelligence gathering and joint operations</p>	<p>Operations</p>	<p>For example, the placement of ICPC Desk Officer in the NFIU and SCUML would be an important step forward in joint work and strengthen the capacity of ICPC</p>
<p><b>Output 2.1.4</b> Reporting format for all ACTUs deployed and enforced.</p>	<p><b>2.1.4.1</b> Deploy mechanisms for implementation of the ACTU Effectiveness Index and ACTU Reporting Template to enhance performance review of ACTUs</p> <p><b>2.1.4.2</b> Report annually on the performance of ACTUs including the reporting frequency and achievement of targets by the ACTUs as well as follow-up actions</p>	<p>SSRD</p>	
<p><b>Output 2.1.5</b> Increased partnership with OHCSF for a coordinated impact on the fight against corruption</p>	<p><b>2.1.5.1</b> Strengthen partnership between ICPC and OHCSF towards increased oversight of ACTUs on MDAs.</p> <p><b>2.1.5.2</b> Liaise with OHCSF to introduce Anti-Corruption Monitoring Officer Professional Cadre in the Public Service/MDAs.</p>	<p>SSRD</p>	
<p><b>Outcome 2.2: Increased Public Empowerment against Corruption</b></p>			
<p><b>Output 2.2.1</b> Completed Integrity Compliance Scorecard to assess MDAs' risk vulnerability</p>	<p><b>2.2.1.1</b> Full implementation/deployment of ICPC's Ethics and Compliance Scorecard in MDAs and publish the results.</p>	<p>SSRD</p>	
<p><b>Output 2.2.2</b> Strengthened capacity of the ACTUs</p>	<p><b>2.2.2.1</b> Train and develop certification process for the ACTUs.</p> <p><b>2.2.2.2</b> Train ACTUs on the implementation of the NACS, procurement oversight in MDAs and to double as MDAs' NACS Committee.</p>	<p>ACAN</p>	



<p><b>Output 2.2.3</b> Increased partnership with States and Local Governments at the sub-national level to mainstream anti-corruption activities</p>	<p><b>2.2.3.1</b> Establish ACTUs in state MDAs and LGA levels</p>	SSRD		
	<p><b>2.2.3.2</b> Encourage the conduct of CRAs and System Studies at state and local government levels, incorporating implementation and monitoring of integrity plans.</p>	SSRD		
	<p><b>2.2.3.3</b> Support CSOs to monitor and track budget implementation and submit report to ICPC.</p>	PEE (Education)		
	<p><b>2.2.3.4</b> Adopt and ensure implementation of the Ethics Policy across the state and local government levels.</p>	PEE (Education)		
	<p><b>2.2.3.5</b> Develop/review Codes of Ethics for State MDAs and Local Government Staff and incorporate Ethics training for the staff.</p>	PEE (Education)		
<p><b>Output 2.2.4</b> Improved awareness and knowledge of the scourge of corruption in schools and public institutions</p>	<p><b>2.2.4.1</b> Hold Teachers/Lecturers' Anti-Corruption Workshops.</p>	PEE (Education)		
	<p><b>2.2.4.2</b> Hold pupils/students' competition about Anti-corruption issues.</p>	PEE (Education)		
	<p><b>2.2.4.3</b> Introduce Anti-corruption themes and courses in Social Studies in Primary and Secondary Schools and General Studies at the Tertiary levels respectively.</p>	PEE (Education)		

			PEE (Education)		
		2.2.4.4 Review National Values Curriculum to identify gaps and introduce the curriculum into all levels of the educational system at the Federal and State-owned schools.			
		2.2.4.5 Develop school curricula at all levels of education to accommodate corruption related issues in collaboration with NERDC.	PEE (Education)		
		2.2.4.6 Implement a training program on ethics and corruption issues for the teachers and lecturers of state-owned schools as well as the private owned institutions/schools.	ACAN		
		2.2.4.7 Ensure the participation of Civil Servants at periodic training on corruption issues and code of conduct.	ACAN		
		2.2.4.8 Incorporate modules on corruption studies in formal management development programs for Civil/Public Servants.	ACAN		
		2.2.4.9 Ensure the implementation of ICPC/LG Integrity Initiative and Integrity Guide for Youth Corps Members.	PEE (Education)		
		2.2.5.1 Partner with the AGF for the ratification and adoption of the National Ethics Policy by Federal Executive Council and facilitate a public launch and presentation of the Policy	PEE (Education)		
<b>Output 2.2.5</b> Strengthened framework to combat corruption	institutional to combat corruption				

	<p><b>2.2.5.2</b> Conduct training/sensitization programmes for stakeholders on the implementation of the national Ethics Policy across all levels.</p> <p><b>2.2.5.3</b> Develop/review Codes of Ethics of the relevant organizations starting with ICPC and train public officers on Codes of Ethics.</p>	<p>PEE (Education)</p> <p>PEE (Education)/ACAN</p>		
<b>Result Area/ Strategy Recommendation</b>	<b>Key Actions</b> <i>(Outline the key steps/actions for implementing this recommendation)</i>	<b>Responsible Person</b>	<b>Timeline</b>	<b>Comments/Implementation Note</b>
<b>Key Objective 3: Increased Managerial Effectiveness of ICPC</b>				
<b>Outcome 3.1: Improved ICPC Management Effectiveness, Style and Culture</b>				
<b>Output 3.1.1</b> More effective and objective system for employees' performance evaluation	<b>3.1.1.1</b> Review, redesign and implement the APER form for use as an individual performance management tool for the delivery of organisational objectives and targets	Admin		An important part of the strategic plan is building a more performance-based approach to the work of the Commission to measure and track performance against agreed targets



	3.1.1.2 Increase efficiency and effectiveness through setting clear departmental and individual objectives that enhance delegation of authority and increase approval limits	Admin	Workplan to be used as a mechanism for management oversight while staff are responsible for getting tasks completed
<b>Output 3.1.2</b> Improved ICPC work quality and reduced bureaucracy	3.1.2.1 Introduce mechanisms and standards for prompt release of operational funds to facilitate speedy discharge of functions, e.g. maximum 48 hours release standard	Finance & Accounts	Timelines need to be clearly defined and systems to run concurrently rather than serially to reduce time wastage  This should not replace the responsibility and accountability of ICPC officers
<b>Output 3.1.3</b> Improved System for Internal Communications	3.1.3.1 Develop a Communication Strategy for the Commission to ensure that all ICPC stakeholders and staff are abreast of developments in ICPC and ensure operational feedback	PEE (Public Enlightenment)	Introduce Newsletter and Multi-media programmes/platforms for increased and improved internal and external communication  This addresses the need for improved inter-departmental communication
<b>Output 3.1.4</b> Developed Systems of "How to's" (Operational Processes/Manuals) for key operational processes: reporting, meetings, etc.	3.1.4.1 Produce a step-by-step operational manual for Departments/Units to ensure effective orientation of new staff and sustainability of operations  3.1.4.2 Initiate and develop appropriate Standing Orders to guide the efficient and effective operation of the Commission	Admin  Office of ICPC Chairman	

<p><b>Output 3.1.5</b> Enhanced ICT strategy for ICPC to upgrade the Commission's ICT infrastructure and capacity</p>	<p><b>3.1.5.1</b> Implement the ICT strategy for the Commission including deploying an intranet for staff at the headquarters and state offices to address the need for increased availability and use of technology</p>	<p>PRS(ICT)</p>	<p>Increasing the overall capacity of the ICPC in this regard is a key platform for future development  Plan for increased budgetary support for ICT</p>
	<p><b>3.1.5.2</b> Put in place the ICT infrastructure and systems to enable ICPC staff access e-mail and utilise computer technology for work purposes, e.g. word, excel, power-point</p>	<p>PRS(ICT)</p>	<p>Develop the capacity of staff to enable individual use of ICT facility</p>
<p><b>Output 3.1.6</b> Devised budget proposal for the implementation of the Strategic Plan covering its full duration</p>	<p><b>3.1.6.1</b> Undertake a financial planning exercise to cost the implementation of the Strategic Plan</p>	<p>Finance &amp; Accounts</p>	<p>While the ICPC faces financial shortfalls, it is important that ICPC demonstrates how it could develop as an organization if properly resourced</p>
<p><b>Output 3.1.7</b> Enhanced training policy to meet the development needs of the Commission</p>	<p><b>3.1.7.1</b> Identify key areas of needs, set priorities and develop a training policy and implementation plan</p>	<p>Admin</p>	<p>Important that a training plan incorporates:</p> <ul style="list-style-type: none"> <li>■ identified key gaps related to functions</li> <li>■ identified training priorities</li> <li>■ leadership as well as technical training</li> <li>■ mechanisms to ensure equity in terms of the distribution of training opportunities</li> <li>■ arrangements for reporting on training</li> </ul>

<b>Output 3.1.8</b> Evaluation of progress in plan implementation undertaken on a periodic basis	<b>3.1.8.1</b> Undertake executive feedback survey to establish the degree of compliance among top management	PRS	Year 2	
	<b>3.1.8.2</b> Undertake employee feedback survey to establish the current degree of alignment and engagement among staff	PRS	Year 2	
	<b>3.1.8.3</b> Conduct annual survey on the perception of the general public about ICPC in conjunction with the National Bureau of Statistics (NBS) to measure stakeholders' satisfaction levels and the Commission's performance	PRS	Year 2 Year 5	While ICPC will drive the survey, the expertise of NBS would be required for the conduct of the survey to give it credence.
	<b>3.1.8.4</b> Undertake a mid-term and finalevaluation of plan implementation	PRS	Year 3 Year 5	Any evaluation should not displace the ongoing monitoring of plan implementation











