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LAGOS AND ABUJA INTERNATIONAL AIRPORTS:

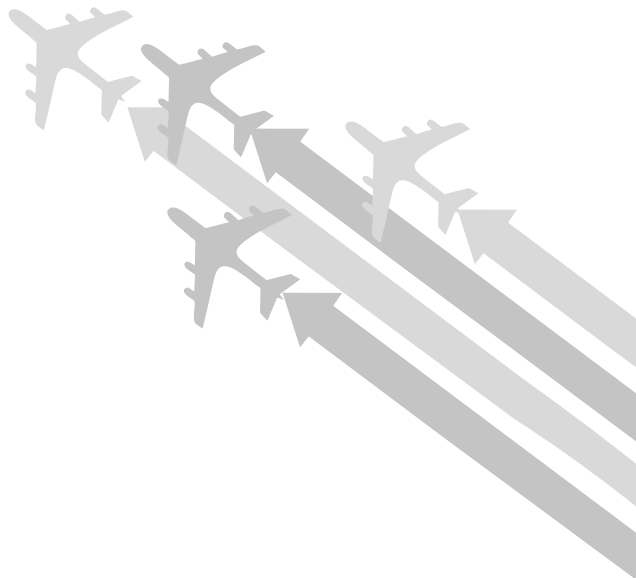
REPORT OF CORRUPTION RISK ASSESSMENT



LAGOS AND ABUJA INTERNATIONAL AIRPORTS: REPORT OF CORRUPTION RISK ASSESSMENT

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LIST OF ACRONYMS

ACTUs	- Anti- Corruption and Transparency Units
AIB	- Accident Investigation Bureau
AVSEC	- Aviation Security
CCB	- Code of Conduct Bureau
DPHS	- Division of Port Health Services
EFCC	- Economic and Financial Crimes Commission
FAAN	- Federal Airports Authority of Nigeria
ICAO	- International Civil Aviation Organisation
ICPC	- Independent Corrupt Practices and Other Related Offences Commission
LASTMA	- Lagos State Transport Management Authority
NCAA	- Nigeria Civil Aviation Authority
NCS	- Nigeria Customs Service
NDLEA	- National Drug Law Enforcement Agency
NAFDAC	- National Agency for Food and Drug Administration and Control
NAGAFF	- National Association of Government Approved Freight Forwarders
NAHCO	- Nigerian Aviation Handling Company
NAMA	- Nigeria Airspace Management Agency
NAQS	- Nigeria Agricultural Quarantine Service
NIS	- Nigeria Immigration Service
NP	- Nigeria Police
ODCs	- On Duty Cards
SON	- Standards Organisation of Nigeria
SOP	- Standard Operating Procedure
UNDP	- United Nations Development Programme
VIO	- Vehicle Inspection Office
WHO	- World Health Organisation



1.0 EXECUTIVE SUMMARY

- 1.1 The introduction, adoption and implementation of targeted approaches in combating corruption through risk assessment and sectoral focus is increasingly becoming popular in many countries including Nigeria. This is consistent with Article 5 of the United Nations Convention against Corruption (UNCAC) which makes it mandatory for countries to develop, maintain and implement effective, coordinated anti-corruption policies aimed at preventing corruption. The Kuala Lumpur Statement on Anti-Corruption Strategies adopted by the Conference of States Parties to the UNCAC in Panama in Resolution 5/4 of 2013 is also now a major driver of anti-corruption strategies. One of the key Principles of the Kuala Lumpur Statement is that the 'Development, implementation and monitoring of anti-corruption strategies should be informed by sound diagnostics, needs and evidence of risk and vulnerability areas and gaps in anti-corruption policies and institutions'. Section 6 (b) (c) and (d) of the Corrupt Practices and Other Related Offences Commission (ICPC) Act 2000 vest ICPC with the power among other things, to examine the practices and systems of public bodies to determine whether such practices facilitate or aid corruption and direct and supervise a review of them.
- 1.2 The Murtala Mohammed International Airport, Lagos and the Nnamdi Azikiwe International Airport, Abuja appear to lack the pizzazz of modern airports both in terms of facilities and ambience. The Federal Ministry of Aviation, its agencies and other stakeholders have striven and continue to work towards improving the standard of facilities and equipment in these and other airports across the country. There remains nevertheless an even graver concern expressed within the government, the local and international media and by the travelling community as well as other users of aviation services that the level of ethical conduct by airport personnel including security personnel in these two airports is low and needs to be addressed. Allegations of brazen corruption including bribery, collusion, extortion etc. by officials and their unpleasant and unhelpful attitude at the airports are rife. These unwholesome practices and the negative impact of corruption on airport safety and security, international reputation and image of the country and passengers' satisfaction have necessitated a diagnosis to determine the factors that cause or create risks that are associated with or contributing to or facilitating corruption in the two major airports. Because a sector or organisations have different structures, business models and operational modalities, it is important to



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identify, understand and appreciate the peculiar risks to those organisations in order to craft an effective and proportionate prioritized response to reduce them. A 'one size fits all' approach in combating corruption is inappropriate. This is a risk-based approach model which avoids the assumption that a corruption problem is obvious but rather emphasizes the need for initial diagnoses to understand why the problem occurs in the first place.

- 1.3 This Corruption Risk Assessment (CRA) is a response to the wide negative, local and international media reports and complaints of corruption occurring in the Nigerian airports focusing particularly on those of the Murtala Mohammed International Airport, Lagos and the Nnamdi Azikiwe International Airport, Abuja both of which account for nearly 70% of all international flights and passenger movements to and from Nigeria. It is the first of preventive measures undertaken by the Independent Corrupt Practices and Other Related Offences Commission (ICPC) with the support and collaboration of the United Nations Development Programme (UNDP) to identify corruption risks and design appropriate responses to curb the growing incidences of corruption and unethical conduct within the operating spheres of the two airports.
- 1.4 The project set out to achieve the following specific objectives: (a) identify and assess the corruption risks that make for such corruption to occur in the airports, the schemes used to execute such corrupt acts, the underlying impact of the acts on the efficiency of the airports and the overall impact on Nigeria as a whole and (b) Suggest policy changes and practical solutions to drastically reduce this malfeasance and reposition these airports to operate in the best tradition of ethical standards of transparency and accountability.
- 1.5 Owing to the multiplicity of agencies, personnel of various backgrounds and a wide spectrum of the public that make use of airport services, the CRA utilized a variety of sources to identify corruption risks at the two airports. The assessment used a combination of methods and techniques including oral interviews and a passenger survey. The interviews and survey were conducted with the aid of specially designed questionnaires administered by



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trained assessors drawn from ICPC and major stakeholders in the Aviation sector from which qualitative and quantitative data were generated and analyzed.

The sources utilized for this study included the internal operational documents of the agencies namely their constitutive legal instruments or laws; Staff Hand Books, Standard Operating Procedures (SOPs), oral interviews with key personnel of the agencies at the airports (both operational and support staff) and the travelling community; annual reports and reports of Aviation Correspondents who have conducted investigation on allegations of corruption at the airports.

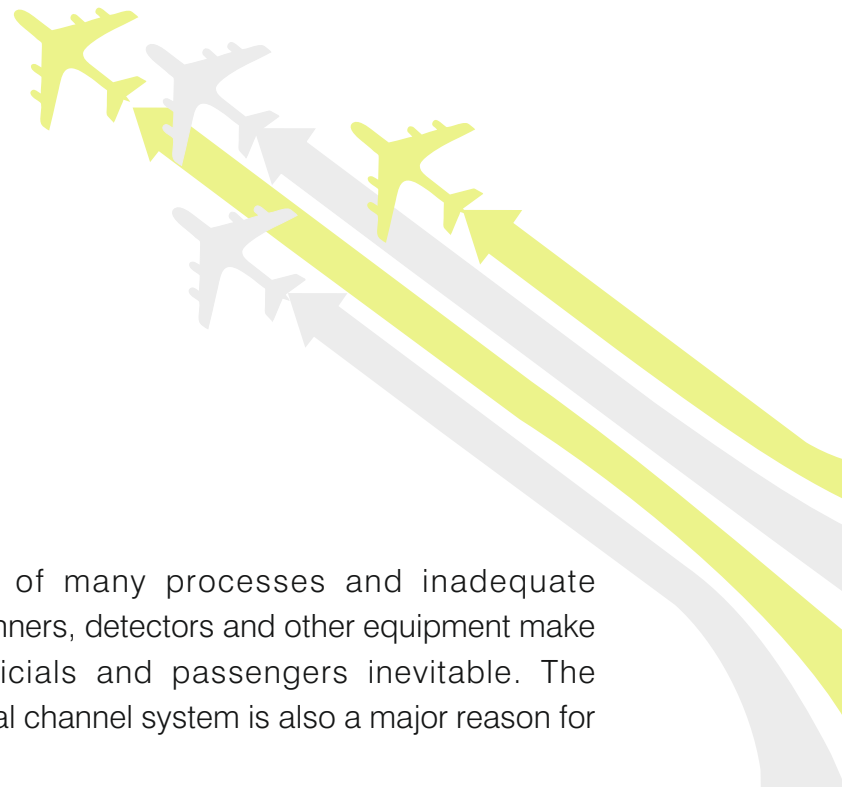
1.6 From the multiple sources consulted and using qualitative and quantitative analyses, the following corruption risks were identified as inherently prevalent with weak controls. They therefore require urgent prioritization and treatment to prevent them from recurring and negatively impacting the Aviation sector.

1.6.1 The findings from the assessment revealed the following:

(a) There is no unified SOP at the airport. The various services rely on their individual agency's SOPs. This creates uncertainty, misunderstanding, confusion and sometimes clashes between officials of the services. The reporting lines are segregated to each of the services with no clear coherent mechanism of harmony and synchronization. Some officials are unprofessional in their duties, a factor that affects their integrity;

(b) There is no sector-wide standardized Code of Conduct for officials and there appears not to be an understanding of what the gift policy is. Officials easily justify gifts or tips on the grounds that they are unsolicited and given voluntarily;

(c) The socio-cultural environment is commonly used to explain and rationalize corruption by officials as an acceptable practice;



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(d) The lack of automation of many processes and inadequate division of CCTV Cameras, scanners, detectors and other equipment make human contact between officials and passengers inevitable. The inoperability of the Customs dual channel system is also a major reason for increased human contact;

(e) There are no defined criteria for posting officials to the airport and no mechanism to test their integrity before resumption of duties;

(f) The welfare of airport staffs is generally poor particularly those of contract personnel whose wages are abysmally low making them highly vulnerable to unethical conduct;

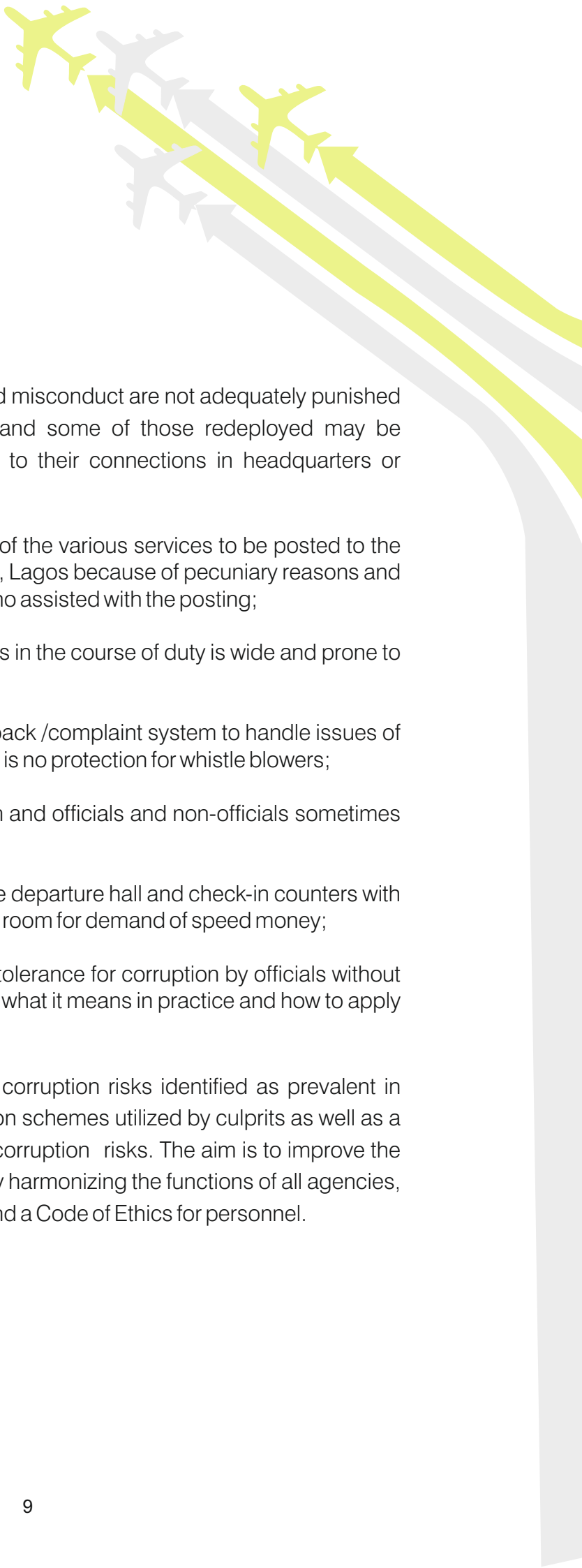
(g) Due to malfunctioned and poorly maintained screening equipment, physical screening of bags and persons becomes inevitable. That creates opportunities for officials to solicit and demand tips or bribes from passengers;

(h) 62.2% of passengers surveyed confirmed that officials normally demand bribes when carrying out their duties while 52.5% confirmed that they have had cause to give tips/gifts or pay a bribe at one time or the other to airport officials;

(i) 55.5% of passengers said the integrity of airport officials is very low;

(j) Abuses associated with the issuance and use of On Duty Cards (ODCs) are particularly common at the Lagos airport;

(k) The circulation of information pamphlets to passengers by the NCAA and the NCS is limited. Many passengers are therefore unaware and uninformed of their rights and obligations in the usage of airports making them oblige demands by extorting officials without asserting their rights. This gap has been exploited by touts;



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- (l) Officials caught in corruption-related misconduct are not adequately punished to serve as deterrence to others and some of those redeployed may be reposted back to the airports due to their connections in headquarters or Command offices;
 - (m) There is high desire by officials of the various services to be posted to the airports particularly that of the MMIA, Lagos because of pecuniary reasons and some make “returns” to superiors who assisted with the posting;
 - (n) The discretion enjoyed by officials in the course of duty is wide and prone to abuses;
 - (o) There is lack of an efficient feedback /complaint system to handle issues of corruption against officials and there is no protection for whistle blowers;
 - (p) Touting is an intractable problem and officials and non-officials sometimes work in collaboration;
 - (q) The constant overcrowding at the departure hall and check-in counters with no alternative to passengers creates room for demand of speed money;
 - (r) There is a general sense of zero tolerance for corruption by officials without an understanding or appreciation of what it means in practice and how to apply the principle.
- 1.7 This report contains the inherent corruption risks identified as prevalent in these airports, some of the corruption schemes utilized by culprits as well as a response plan to curb the residual corruption risks. The aim is to improve the overall operations at both airports by harmonizing the functions of all agencies, adherence to a standardized SOP and a Code of Ethics for personnel.



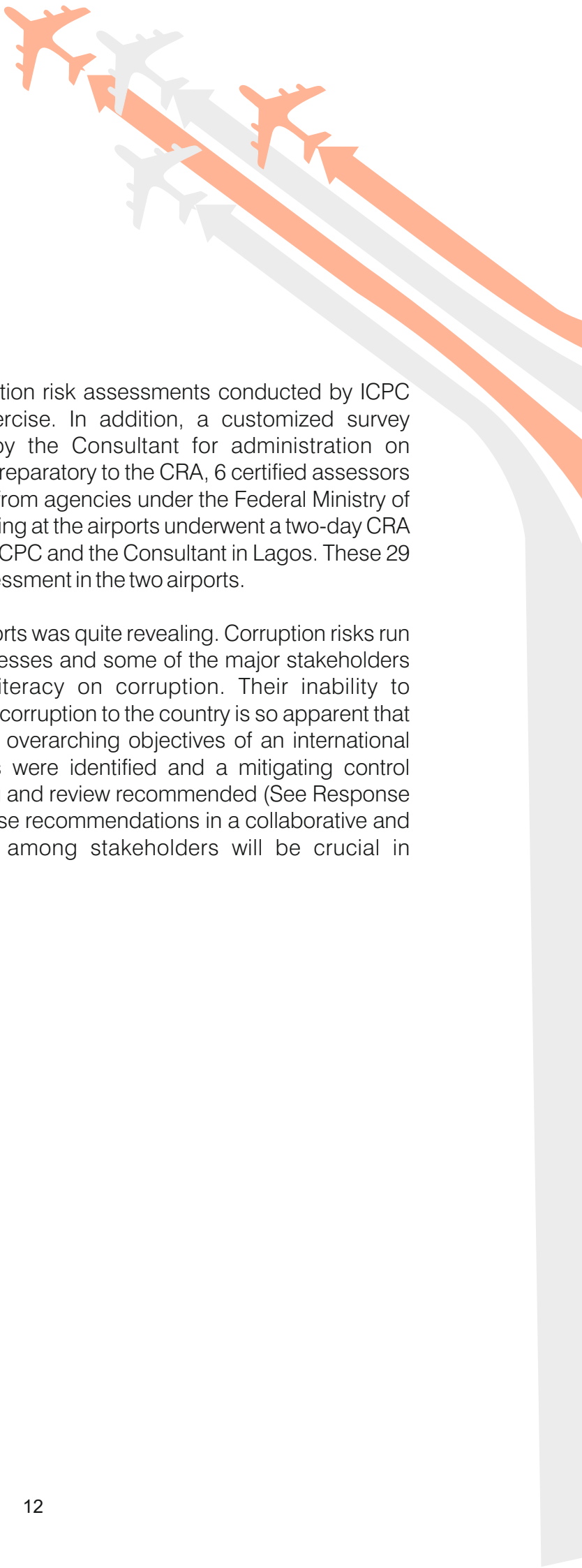
2.0 BACKGROUND

- 2.1 There are about 26 airports and 30 airstrips in Nigeria today. This signifies a highly developed air transport network in the country. Four of these airports in Lagos, Abuja, Kano and Port-Harcourt accounted for 74% of all passengers on the international routes in 2013 alone. However, it is the International Airports in Lagos and Abuja that are the major hubs and economic gateways of Nigeria and the window through which the nation showcases its reputation and vast economic and tourism potentials. The airports give a first time visitor an impression of what the country and its people are and the ease and transparency with which to conduct business. It is therefore of importance that the way and manner in which business is conducted and perceived at the two airports by officials of multiple agencies should conform to the best minimum international standards.
- 2.2 The Federal Ministry of Aviation has over the years undertaken reforms to reposition the aviation sector generally and in particular to remodel the airports including installing requisite equipment to ease passenger and cargo processing. It is in recognition of these efforts that the United States Government has accorded Nigeria Category 1 status which means that her international airports including those in Lagos and Abuja are operating substantially in line with the International Civil Aviation Organisation (ICAO) standards. That is on the positive side. On the other hand, there are allegations that the ethical and professional conduct of airport staff is unhelpful to the overall growth of a sector that presently contributes only 0.4% to the Gross Domestic Product (GDP) of the country. Staff behaviour in these airports is seen as damaging to the reputation of the country and this is further accentuated by the experience of foreigners at the airports some of who recount unpleasant experiences. This attitude if true, jeopardizes the quest for Foreign Direct Investment (FDI).
- 2.3 It was for the above reason that the Federal Ministry of Aviation entered into a Memorandum of Understanding (MOU) with ICPC on December 9, 2014 to collaboratively fight low level corruption in the aviation sector with a targeted focus on the two busiest international airports in Nigeria: the Murtala Mohammed International Airport, Lagos and the Nnamdi Azikiwe International Airport, Abuja. In furtherance of the MOU, a Corruption Risk Assessment (CRA) was to be conducted in the two airports to identify and determine corruption risks that exist and design appropriate response plans to address the risks and strengthen transparency as well as enhance service delivery.



BACKGROUND

- 2.4 Countries all over the world are aggressively upping the ante against corruption in line with the UNCAC and other multilateral anti-corruption legal instruments. Measures are being taken to ensure that businesses are conducted in a corruption-free environment in order to remain competitive. Businesses are themselves instituting robust compliance programmes to combat corruption and to comply with both domestic and international anti-corruption Codes. A key feature of these compliance programmes is a strong refrain from making facilitation payments to government officials either to secure or maintain businesses or speed up processes including airport passages for staff or clearance of air cargo. The consequences of infractions are grave including huge monetary fines, commercial losses and reputational damage. Businesses under the radar of the US Foreign Corrupt Practices Act and the UK Bribery Act will be particularly cautious of doing business in or through Nigeria as their officials will in all likelihood use these two airports for their businesses. Investors are generally discouraged and refrain from investing in countries whose environments are susceptible to the payment of facilitation.
- 2.5 Countering corruption at the nation's two most famous and lucrative airports therefore has a lot of benefits to the country. Apart from enhancing expeditious processing of passengers and cargo which will save wasted time and unbudgeted additional costs, it will also open countless opportunities and attract foreign investment. The Nigerian public itself looks forward to enjoying services at the airports with officials functioning ethically, professionally and transparently as is the case with officials in most international airports in the world.
- 2.6 There is every justification for this joint initiative by ICPC and the Federal Ministry of Aviation and its agencies. Multi-stakeholder initiatives are trending in anti-corruption policy design and implementation. Its adoption by public organisations as in this case, to address an identified industry-specific challenge is particularly helpful as responsibility will be shared in mitigating it. It increases the impact and credibility of individual action and fosters an alliance between likeminded organisations to add verve and momentum to the sustenance of the wider strategy to fight against corruption.
- 2.7 Initiated in 2014, the present CRA in the two airports began with the signing of an MOU between the major stakeholders, the Federal Ministry of Aviation and ICPC. A Consultant was then retained to guide the process. A methodology



BACKGROUND

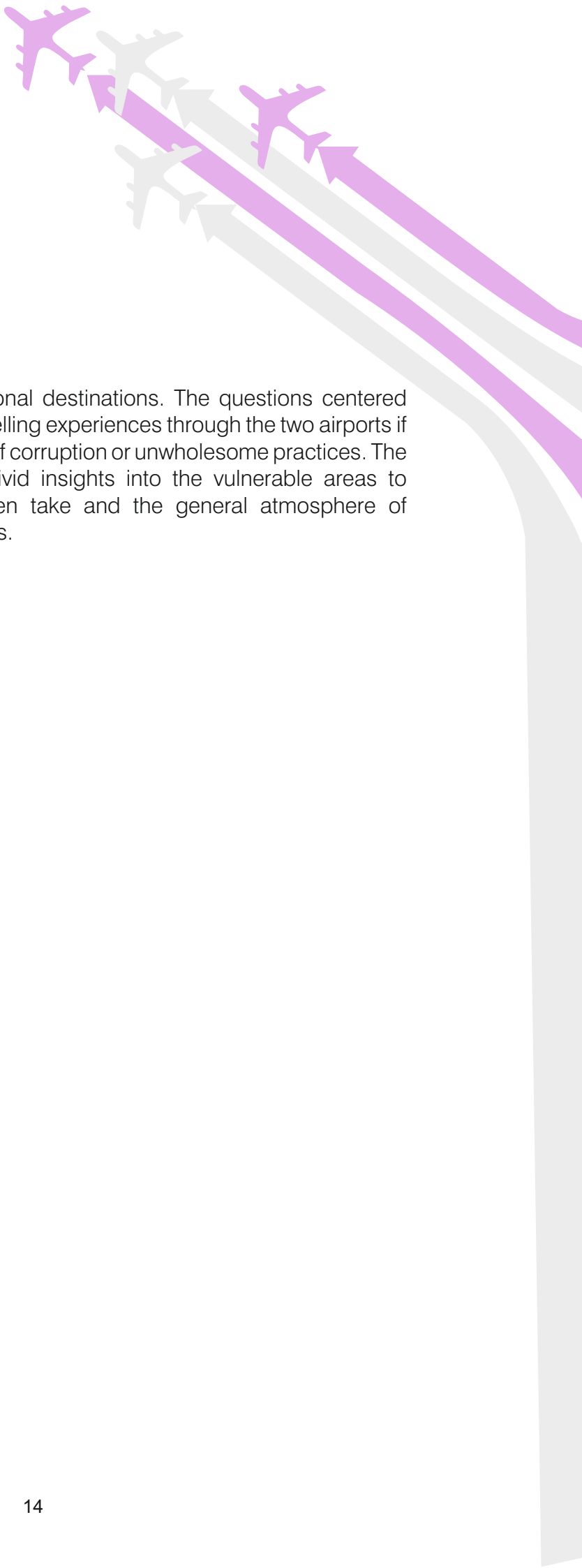
prepared to guide earlier corruption risk assessments conducted by ICPC was adapted for the CRA exercise. In addition, a customized survey questionnaire was prepared by the Consultant for administration on passengers at the two airports. Preparatory to the CRA, 6 certified assessors from ICPC and 23 others drawn from agencies under the Federal Ministry of Aviation and stakeholders operating at the airports underwent a two-day CRA orientation training facilitated by ICPC and the Consultant in Lagos. These 29 persons conducted the Risk Assessment in the two airports.

- 2.8 The CRA exercise at the two airports was quite revealing. Corruption risks run through most of the airport processes and some of the major stakeholders demonstrated obvious risk illiteracy on corruption. Their inability to understand the threats posed by corruption to the country is so apparent that they appear to lose sight of the overarching objectives of an international airport to a nation. These risks were identified and a mitigating control programme including monitoring and review recommended (See Response Plan). The implementation of these recommendations in a collaborative and shared spirit of responsibility among stakeholders will be crucial in addressing the identified risks.

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3.0 METHODOLOGY

- 3.1 A risk assessment is a dynamic process that consists of an inventory of all of the organisation's or department's exposures that could impact its fundamental objectives. It also involves the identification of the risks, analyses of their potential impact on objectives and evaluation of the impact taking into account existing controls. The objective of this CRA was to identify corruption risks at the two international airports in Lagos and Abuja which hinder and negate the core objectives of managing the airports transparently in line with international best traditions of the aviation sector for the overall benefit of the country's economy and its reputation as a corruption-free nation. The methodology adopted was to enable a self assessment by the stakeholders and an external assessment by the travelling community. This was meant to encompass the world of threats and opportunities not only from an inside-out view but enlightened by an outside-in view reflecting the expectations and fears of all main stakeholders. This gave credibility and integrity to the process and enabled the certified assessors to have a balanced view of the risks identified. In the course of the exercise, assessors under a guided questionnaire had interactive interviews with officials and stakeholders, most of who shared their experiences on their operational activities and pointed to areas they identified as particularly vulnerable and the control measures in place.
- 3.2 The Risk Assessment (RA) paid particular attention to organisational corruption rooted in the culture and business processes. Some of the assessors were staff of the agencies interacted with which gave comfort to the officials of the agencies to speak freely. Being also a diagnostic exercise, the methodology afforded the assessors opportunity to analyze and draw conclusions as to the areas considered to be highly vulnerable to corruption based on the information provided to them.
- 3.3 In addition and complementary to the oral interviews, a desk review of the aviation sector legal framework and the National Policy on Aviation was conducted to determine whether there are areas that need to be strengthened or better operationalized.
- 3.4 The outside-in view of the exercise was conducted through observation and with the use of a structured passenger survey. 1070 questionnaires were administered in the two airports; 650 in Lagos and 420 in Abuja on passengers travelling to or



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returning from various international destinations. The questions centered principally on their personal travelling experiences through the two airports if they had encountered any form of corruption or unwholesome practices. The answers provided also gave vivid insights into the vulnerable areas to corruption, the forms they often take and the general atmosphere of transparency in airport operations.



4.0 CHALLENGES AND LIMITATIONS

4.1 There were challenges encountered in the course of this assessment. Time was rather too short to gather detailed data from the agencies and stakeholders. While there was a diversity of stakeholders interviewed, the report could have benefitted from a larger number. Appointments with some agency officials were difficult, some of who insisted on getting clearance from superior authority before they would speak to the assessors. Some of the information (including details of past incidences of corruption by officials) promised by officials to be provided during the course of oral interviews was eventually not supplied. Other agencies declined to provide any data or details on the grounds of confidentiality or security. Some officials were also over protective of their agencies and were cautious with information ostensibly because of the political sensitivity of the subject of corruption. It was also recognized that the perception of corruption at the airports of some travelers surveyed may have been sensational due to past experiences that do not hold true today. Nevertheless their views added weight to certain findings collated from the interviews and other sources.

Despite these limitations, the qualitative and quantitative analyses of data were guided by integrity throughout the process of this assessment. It was nevertheless gratifying that FAAN and NCAA assisted greatly in setting up appointments with other agency officials where that was initially difficult and also provided logistics.



5.0 ASSESSING THE LEVELS OF CORRUPTION RISKS

- 5.1 To get a general sense of the nature of corruption risks that an organisation, sector or country may have, requires assessing its peculiar environment, the character of the organisation and finally, its officials or personnel.
- 5.2 Environment Level: At the environment level, attention was paid to the constitutive legal instruments, the socio-cultural and political environments to determine the extent to which they act as external facilitating factors to corruption in the aviation sector in the two airports. With the aid of the business tool of PESTLE, an acronym for Political, Economic, Social, Technological, Legal and Environmental factors, the macro environmental factors were examined alongside a modified corruption-related Strength, Weaknesses, Opportunity and Threats (SWOT) analyses where it was required to weigh them against threats that may work against achieving set objectives. The general Nigerian environment was considered, particularly those aspects of societal behaviour that act as catalysts to corruption. The following resources were utilized: desk-sourced materials, oral interviews with stakeholder officials and a survey of some passengers.
- 5.3 Organisation Level: The operations of the airports although under the overall ownership and management by FAAN/NCAA, are characterized by an organisational structure that is somewhat dispersed under several agencies performing specific responsibilities but not reporting directly to the managers of the airports. The operations of these agencies were therefore critically examined and analyzed to determine if they correlate with and enhance the overall objectives of the airports or if any aspect of them are organized in a manner that create corruption risks. The criteria used for this determination were: the necessity or otherwise of a particular process, the discretion available to the officials and whether it may be abused, reporting lines in the event of any infraction and the nature and promptness of disciplinary measures against erring officials. Information was sourced from available Standard Operating Procedures, Staff Hand Books and information supplied during interviews.

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ASSESSING THE LEVELS OF CORRUPTION RISKS

5.4 Personnel Level: During this study, assessors robustly engaged senior officials during interviews to determine the extent to which the personnel, both official and non official are vulnerable to corrupt tendencies. The aim was not to examine specific cases of corruption against existing or past officials but to gauge the level of risks staff may face in the course of execution of their duties. This aspect of the assessment greatly helped in exposing some of the specific and generic challenges including rationalization and peer pressure that expose staff to corruption risks and form the basis of the recommendations for mitigating controls.



6.0 FINDINGS

6.1 The results in this report are based on the data and information gathered from interviews granted by various stakeholder officials, passenger questionnaire survey, desk review of official documents provided by the stakeholders and media reports on the aviation sector etc.

6.2 The abuse of office by public officials for private gain remains a matter of great concern in Nigeria. In spite of past efforts at combating corruption in the country, the problem appears not to abate. There have been marginal improvements in the rating of Nigeria by Transparency International in the last couple of years but that is yet to translate to visible results as there are still reservations expressed even at the highest level of the Presidency that corruption has and is destroying virtually all facets of our socio-economic development efforts and must be fought to a standstill. In the 2014 TI Corruption Perception Index, Nigeria ranked number 136 out of 175 countries surveyed. This was an improvement by eight points over the 2013 rating when she was ranked 144th position. In 2011 and 2012, Nigeria ranked 143rd and 139th respectively.

6.3 By all assessments, the transparency status of Nigeria is not reflective of a country that has in the last fifteen years instituted robust anti-corruption reforms implemented by the three major anti corruption watch-dog institutions, ICPC, EFCC and Code of Conduct Bureau (CCB) and a host of other agencies. Other rating agencies including the Mo Ibrahim Foundation on corruption and good governance in Africa, the World Bank ranking on the ease of doing business, the African Union (AU) study on illicit financial flows etc are consistent that the rate of corruption in Nigeria is still unacceptably too high.

6.4 The abysmal corruption situation in Nigeria has naturally rubbed off on the aviation sector. Virtually all past reports of investigations or inquiry into the affairs of the aviation sector by the Government or National Assembly returned a verdict of lack of transparency. For example, a Government White Paper on the Recommendations of the Judicial Commission of Inquiry into the erstwhile Nigerian Airways Limited established that bribery and reckless abuse of office amongst other factors were responsible for its demise. A 2006 research report conducted by the EFCC Training Academy, Karu, Abuja also found that corruption (kickbacks) was at the centre of air disasters in Nigeria and that the problem continues to thrive because of weak law enforcement.

6.5 Unemployment and poverty are both a cause and effect of corruption with the result that these two nagging problems continue to hinder all efforts at countering corruption in



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the two airports. The tolerance level of corruption by many citizens is very high and the predisposition to corruption is proportionately high. It is immaterial that many people openly speak against corruption; they get involved in it at the slightest opportunity. This is manifested in the general tolerance and the seeming support and institutionalization of touting at the airports by security officials. Touts are used for errands and sometimes act as agents for unwholesome activities by officials. By so doing, they lose the moral ground to chase them away from the airports.

6.6 Touting is such a huge risk not only to facilitating corruption but the general security of the airports. It is highly visible at the Cargo terminal. Some of these touts are staff and security officials who engage in protocol work for individuals and companies. As most of them are ex staff they also have the sympathy of their colleagues who facilitate their entry into the terminals. They have several methods of beating security measures. Some of them have become so brazen as to produce fake FAAN Identity Cards or On-Duty Cards and use them to hoodwink unsuspecting passengers and extort monies from them including the sale of Yellow Cards issued by the Port Health Services for exorbitant fees without vaccination or sometimes sale of fake ones. It is public knowledge that the menace of touting with all its security implications is still prevalent at the airports.

6.7 The two airports examined in this project are highly attractive to officials of the Services for pecuniary reasons and many lobby and influence their posting there. Deployment out of the airport is considered punitive and all efforts are made to be re-deployed back after a few years. In some instances postings could be on the basis of an understanding that the beneficiary will show appreciation to those who make it possible with gifts, the failure of which may lead to a redeployment out of the airport to places considered to be non-lucrative.

6.8 While the law permits the presence of several security services at the airports, the way and manner they conduct their duties more often than not create opportunity for corruption. Rather than a collaborative screening procedure on passenger luggage, some of the officials insist on separate screening under the excuse that their legal responsibilities are different. This lengthens the time it takes to process passengers, creates congestion and provides opportunity for potential corruption.

6.9 Interference by superior officials and professional colleagues to facilitate passengers' passages is a common threat. Some of these officials abuse protocol services by acting as protocol officers for multinational companies. They also abuse VIP screening by exempting such category of passengers from screening.



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6.10 There is yet another concern raised regarding processing departing and arriving passengers by both SSS and immigration officials sharing a common desk. This is perhaps unique to Nigeria as it is customary in major international airports all over the world for passengers to be screened by one official at the immigration desk. The role of the SSS officials on that desk is principally to track suspect indexes or those watch-listed. It was observed that the process also causes avoidable delay.

6.11 It was also found that the available mechanism for reporting corrupt practices is highly inefficient. Advising passengers to report any form of solicitation/demand for gratification to any available security officer according to NCAA Consumer Digest, amounts to reporting culprits to themselves. Again it remains unclear why departing passengers are to report to security officials while arriving passengers are to report to the Consumer Protection Directorate of the Complaints Office at the airports. In the absence of a whistle blower protection law or regulation and an independent ombudsman to handle such cases it is doubtful if the public will have the confidence to report corrupt officials for fear of reprisals. There is no evidence that officials who had been involved in corruption in the past were adequately punished other than a reposting out of the airports by the various services. This state of affairs will not deter others who may consider colleagues posted out as merely temporally unlucky.

6.12 It was also found that passengers, their large retinue of escorts and other airport users are a major corruption risk. They often offer security officials money at the entry and departure points for one favour or the other. Specific areas where these acts occur are the traffic control points, parking spaces and the terminal access points. Corruption through collusion between security agents and passengers is therefore common in these areas. This gap also enables touts to enter and operate within the airports, particularly in Lagos.

6.13 Assessors found that generally, corruption risks are exacerbated by a set of factors that continually create incentives and opportunities for corruption for the officials. These include: low levels of automation and computerization, poor and dilapidated infrastructure, lack of training and professionalism, low levels of ethics and morals, poor wages, and weak controls and oversight.



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6.14 In spite of the ongoing airports infrastructure remodeling and other reforms embarked upon by the Federal Ministry of Aviation, very little attention if any has been paid to the entrenchment of ethics and the development and deployment of compliance and automated systems that will stem corruption at the airports. Other than the normal training received by officials from their services on discipline, no consistent and conscious programme or refresher programme exists to sustainably train officials posted to the airports on a regular basis. The problem is compounded by the retinue of ground handling staff some of whom have no training on ethical conduct or integrity in airport operations and are poorly paid, making them highly vulnerable to being used as agents or vehicles for corruption.



7.0 FACTORS INFLUENCING TRANSPARENCY AND INTEGRITY AT THE AIRPORTS

The interplay of certain factors plays a key role in influencing the level of integrity of officials and transparency of the general airport operations. The presence or absence of these factors, which are either primary or secondary may reduce or increase corruption vulnerabilities.

7.1 Political Factors

7.1.1 The key thrust of the Nigerian Civil Aviation Policy (NCAP) 2013 is to develop broader strategic plan to build a stronger, dynamic and liberalized aviation sector that will meet present and future challenges. The strategic objectives to this policy include institutionalization of world class safety and security standards, development of world class infrastructure, reforming institutions, developing capacity and increasing professionalism and having zero accidents rates in the aviation industry. The policy also identified the current sector challenges to aviation sector growth and development to include inadequate infrastructure and poor maintenance, aging technical personnel, poor power supply, lack of clarity on regulatory enforcement and overlapping functions by agencies.

7.1.2 It is significant to note that corruption in the sector is not recognized as a challenge and countering it is not one of the strategic objectives of the policy. This is a major gap in the policy given that virtually all previous reports on the sector identified corruption as a major hindrance in attaining some of the strategic objectives of the sector. This exclusion or oversight may be mistaken or construed as a demonstration of a lack of political will by the aviation authorities to combat the menace of corruption at the airports given its magnitude and pervasiveness as reported by both the local and international media and acknowledged even by a former President. At a forum of aviation stakeholders presided over by former President Obasanjo, following the 2005 Sosoliso airlines crash, he was point blank that the sector was too corrupt and threatened to replace all the managers with foreigners as in his words 'they are corrupt from top to bottom'. While that situation may have somewhat improved, the problem is still a live issue. The Managing Director of FAAN only recently complained bitterly that airport officials put in charge of securing vital airside critical equipment were involved in stealing them (This Day Newspaper, Friday November 6, 2015, pg 22). It is therefore inconceivable how security/safety which is given primacy in the Policy can be addressed without simultaneously addressing the problem of corruption.

7.1.3 Encapsulated in the policy thrust amongst other things is the development of the Lagos and Abuja airports as hubs for passenger and cargo transportation in



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Nigeria. However, in spite of the huge potential of the aviation sector as a trillion dollar business spinner, the political environment continues to hinder the attainment of the policy objectives. There are too many frequent changes of the Ministers of Aviation and the Heads of the key parastatals with the result that projects sustainability is affected. The remodeling of these airports for example either slowed down or became suspended once there was a change of Minister and or regime. In spite of the statutory independence granted FAAN or NCAA by law, it would appear that they are not able to initiate and execute projects on their own without the direction of a Minister or without some political influence. This arrangement may continue to constrain aviation sector objectives as time and resources are being wasted.

7.1.4 Furthermore, the multiplicity of agencies operating at the airport is more a function of politics. The government had in the past taken some of them out of the airports but sooner than later they were returned after political pressure was mounted at headquarters. Some of the agencies such as the Nigeria Agricultural Quarantine Service admitted that they are operating in the airports without any enabling law or policy. This has increased the level of direct contact with the travelling community which could well have been avoided to prevent some of the risks of corruption identified. Most of the agencies also insist on having their desks at the departure or arrival halls in order to be involved in passenger screening. While the services rendered by these agencies are necessary and important, they may well be performed in a manner and locations in the airports or their precincts that will not add to the existing bureaucracy and red tape associated with screening of passengers and cargo and the less than effective inter-agency collaboration or cooperation.

7.1.5 There is yet another challenge. Besides the general national corruption problem of which the aviation sector is only a part, the politics of employment in Nigeria and the application of the Federal Character principle engender nepotistic tendencies amongst public service employers including aviation with the result that integrity, very critical in the Aviation sector is sometimes not accorded due consideration as it should in the recruitment of personnel. When this challenge is considered alongside the nagging issue of lack of sufficient independence of the NCAA and FAAN on account of the rigid control by the Ministry, it would be realized how serious the problem is. See for example Sections 6 and 8 of the FAAN Act.



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7.2 Economic Factors

7.2.1 Considering the size and population of Nigeria, the contribution of N119 billion (0.4%) of Aviation to her GDP as reported by the Oxford Economics in 2010 is not significant. There is largely a policy and performance mismatch leaving the huge aviation potential untapped. Nigerian airports have over the years suffered from neglect and poor funding. Even the little funds provided for infrastructure upgrade was enmeshed in corruption.

7.2.2 The airport remodeling programme begun in 2011 for which it is reported that over N500 Billion was secured through foreign loans to uplift the quality of facilities and infrastructure in the airports in Lagos, Abuja, Kano and Port Harcourt, is now seemingly abandoned as contractors complained of non payment for the works so far performed. International travel by air or expeditious transportation of cargo can hardly be substituted. Consequently, air travel is and will remain the choice of the ever growing travelling community. An increase in passenger volume will only add pressure to the existing poor facilities in the airports and provide opportunity for unwholesome activities.

7.2.3 The huge investments required in these airports need to be sustainable under arrangements that provide adequate guarantees to the investors. When investors spend more than usual time to analyze potential political changes that will affect economic investment decisions then the flow of funds in this sector will dry up or only trickle down. The economic environment is characterized by 'straddling', a system in which political and economic power overlap to such an extent that all politicians are businessmen and blurs the realms of public and private and encourages patronage. An investment environment needs to be created to give comfort to investors irrespective of political changes or regime change. There is also need for a rethink by the authorities on the MMIA, Lagos in particular. It would appear that the infrastructure and facilities in that airport terminal are so old and dilapidated that no amount of remodeling can bring them to the best international standards. It has become so routine that each government embarks on one form of remodeling or the other and sooner than later, the facilities are broken down again. It does not make economic sense to continually remodel given the resources involved. On the long term, there should be a consideration of constructing a completely new modern



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terminal building designed in such a manner that security, both at the land and airside, passenger comfort and access roads will be adequately factored in. All these will influence how transparently business processes are conducted at the airports.

7.3. Social Factors

7.3.1 Corruption in Nigeria is largely driven by social and economic inequalities of citizens and behaviours are not easily altered by laws. Entrenched inequalities militate against a consensus on corruption and its detrimental effects. Tolerance for corruption has a wide margin and many people are ambivalent about it. Petty corruption (otherwise called 'quiet corruption') such as collusion to evade the law or extortion in return for services which are common at the airports, is often not considered as economically harmful and therefore morally acceptable. It is high level corruption involving millions or billions that are considered to be economically harmful.

7.3.2 The relationship between the citizen and the public service is that of uncertainty and corruption provides the way to manage the uncertainty and the dysfunctional public service. There is also the constant pressure on citizens to meet their social obligations much of which requires money that can hardly be earned by legitimate means.

7.3.3 Social relations are still largely governed by 'the economy of affection', a situation in which the cultivation of personal relations is an important part of how persons behave and make their choices. It defines the relationship between groups connected by blood, kin, community or religion. The Nigerian society is typified by this situation and it affects officials in conducting their official duties. It is the case that officials at the airports would go out of their way to assist their friends, family, members or kinsmen particularly during circumstances where they have not satisfied minimum requirements of travel through the airports. Sometimes such kinsmen are assisted to unjustifiably avoid due screening.

7.3.4 There is yet the problem of the 'collective action dilemma' because corruption seems to be the expected behaviour in the society rather than the exception. Under a collective action problem, the principal-agent theory collapses as neither is willing to enforce the law as the benefits of corruption far outweigh the costs. Punishment is erratic and seldom applied making the risk of corruption very low thereby encouraging more and more people to be corrupt. The problem is even compounded at the airports. With a multiplicity



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of agencies operating simultaneously and reporting to their respective agencies and not necessarily the managers of the airport, FAAN and NCAA and, in the absence of an effective and robust coordinated effort against corruption by all officials at the airport, countering it becomes even more difficult.

7.3.5 Nigeria has often come under unfavourable publicity on pervasive corruption at its airports. The latest of these reports was the recent survey conducted by Sleepingairports.net. Based on feedback from travellers on several criteria such as terminal services, cleanliness and comfort, the Port Harcourt International Airport was ranked as the worst in the world. The report also listed Abuja and Lagos airports as the 7th and 10th worst in Africa. The report specifically said: “from dirty floors and bathrooms, to the regular request for bribes, lack of air conditioning, general navigational chaos, travelers were unimpressed with the airports that made it onto the list of worst airports in Africa”. The Nigerian aviation authorities through FAAN condemned this report as unfounded and not reflective of the true state of affairs in these airports particularly that they were under renovation/remodeling. There is no doubting the fact that the report was highly subjective and not based on any scientific analysis. Nevertheless many travellers world-wide will perceive the information provided as true. The value of the report is that it provided a wake-up call on the authorities to step up efforts in fixing the airports. The period of remodeling is unjustifiably beginning to take too long. While there was no specific reaction on the allegation of corruption against officials, FAAN acknowledged that customer service needed improvement and that there was ongoing collaboration with ICPC to improve customer service at the airport. Commendable as this is, the assessors found little evidence in actions taken against officials and their collaborators involved in corruption to severely punish them in accordance with the law. It is therefore expected that action needs to be taken on this. So long as corruption at the airports is treated as an administrative matter and officials caught are merely redeployed or handed mild administrative punishment which are not publicized, others will never be deterred but incentivized to be corrupt.



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7.4 Technological Factors

7.4.1 The use of technology in business processes including government agencies has been growing rapidly in Nigeria in the last decade. The automation of processes through Information and Communication Technology is fast replacing the manual manner of doing business. Indeed information technology penetration and development in Nigeria is one of the highest in Africa. According to the Nigerian Communication Commission, while the broadband penetration in the country stood at 10%, the number of Internet users on Nigeria's telecoms networks has hit 97.21 million as at November, 2015.

7.4.2 Regrettably, the level of technology usage in airport processes particularly those dealing with billing and payment is still very low with much of the processes conducted manually. Even NAMA whose duties are purely technical including navigational, communication, traffic surveillance and aeronautical chart services still manually process its billing and payments. Cargo at the cargo terminal are manually valued and paid for. Assessors found that while computers are used to check in passengers and process their immigration departures/arrivals and endorsements, scanning machines for passengers and baggage screening are inadequate and the available ones frequently malfunction making physical screening inevitable. Weighing scales are not often calibrated as a result of which luggage may be under-declared for a fee or passengers are shortchanged. Ramps and elevators work epileptically. So also are the CCTV cameras whose coverage is limited and suffer frequent breakdowns. Some of the equipment has since exceeded their life span. Consequently, the use of IT tools to promote transparency in airport operations is still limited.

7.4.3 The problem is further compounded by the lack of harmonization of screening of passengers or baggage by the multiple agencies who insist on carrying out their duty independently of the other. In the absence of a centralized industry SOP, agencies depend more on their agency SOPs which do not necessarily accord with the FAAN/NCAA SOP. Although some of the agencies said they are guided by ICAO Regulations, evidence of clashes and misunderstanding between some agencies from time to time tend to suggest that ICAO regulations are not strictly followed all the time. Assessors for example found that On Duty Cards (ODCs) were rampantly



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abused and that there is possibility that touts use fake ODCs to gain access to restricted areas to engage in illegal activity. Access points are not technologically enabled such that an ODC not meant for a particular area is not used to access to it. The ODCs are merely produced with distinctive colors to indicate area of restriction but without the necessary technology to control entry. Their effectiveness in barring unauthorized entry therefore becomes highly limited.

- 7.4.4 The use of technology to interact with the public on their rights and obligations of passengers is also not common place. The fliers produced by the Nigerian Customs Service and the Consumer Protection Directorate of the NCAA are not sufficiently distributed. Updated composite information on passengers' rights are not regularly published on the NCAA website.

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The legal environment in the airports is governed by a host of legislations, Regulations and Administrative Guidelines. However, the Federal Airports Authority Act, 2006 and the Nigerian Civil Aviation Act, 2006 are the principal legislations.

8.1 The Federal Airport Authority of Nigeria (FAAN)

8.1.1 The Federal Airport Authority of Nigeria Act, Cap. F5 LFN, 2010 charges the Federal Airport Authority of Nigeria (FAAN) under Section 3 with the responsibility of developing and managing airports including the provision of adequate facilities and personnel for effective security in the airports. FAAN is a parastatal under the Federal Ministry of Aviation and therefore under the control of the Minister in charge of Aviation under Section 8. Perhaps, its major constraint is the lack of autonomy in managing the airports. Its staff strength of 4,350 is recruited under the core public service rules by either FAAN or the Ministry and is merely deployed to the Authority to man the 22 airports across the country including Lagos and Abuja. It has contracted out its security and cleaning services to companies whose staff are neither profiled nor over sighted by FAAN. Contracts are awarded by the Ministry without reference or input by FAAN and the release of its budgetary allocation is delayed. This framework seems to have made FAAN to operate as a typical Civil Service outfit with all the bureaucratic red tape; an arrangement not suitable for the management of the airports in a business-like manner.

8.2 The Nigerian Civil Aviation Authority (NCAA)

8.2.1 NCAA is created by the Civil Aviation Act 2006 12.1 Cap13 LFN 2010. Under Sections 30 and 31, it is vested with the power and responsibility for safety, efficiency, and regularity of air navigation and the safety of aircraft and of persons and property carried in aircraft in accordance with all international Conventions and Agreements, government policies and International Civil Aviation Organisation (ICAO) standards. It is also responsible for the security control and screening to which passengers and baggage would be subjected before boarding or being laid on an aircraft. It regulates the standards for the provision of civil aviation security in Nigeria and airline operators including licensing. NCAA is equally responsible for instituting programmes for the protection of consumer interest through its Consumer Protection Directorate by addressing their complaints.

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8.2.2 Safety and security are closely interrelated concepts and are often used interchangeably. Safety relates to the actual operational aspects of civil aviation and deals with issues like personnel licensing, certification and air worthiness of aircraft, aerodrome design and engineering, communication and navigational systems and other issues. Security on the other hand, deals with the external, usual, third party elements that seek to interfere with the safe operation of the aircraft or endanger the lives of passengers, crew, other persons and property including air navigation facilities either on board the aircrafts in flights or on the ground.

NCAA and FAAN share key security responsibility at the airport and are expected to work collaboratively to ensure that the airports are safe for travel. Aviation Security (AVSEC) under the NCAA is the department responsible for the overall security at the airports. This is consistent with Annex 9 and 17 of the Chicago Convention. All the other security agencies are expected to work with AVSEC personnel at the airports.

8.2.3 While under Section 28 of the Civil Aviation Act, 2006 the Minister of Aviation may after consultation with the Authority give direction on matters of policy, the NCAP 2013 guarantees the Authority's independence and autonomy in its operations. It would appear however that in practice the Ministry influences most of its decisions including matters of procurement. Such influences may create opportunities for corruption. It would definitely be in the interest of the Aviation sector if the Minister and ministry restrict their intervention only to matters of policy as listed in Section 28.

8.2.4 The power of NCAA to oversee airport security appears to have operational challenges in terms of relationship with other services. Without a centralized SOP for use at the airports it becomes even more challenging. If security is not centralized as it is now, avenues for wrong doing may well be heightened amongst officials as each agency follows a procedure that may create room for abuses. This is evident in some of the lapses that have occurred in the past when some security officials were caught with a huge amount of undeclared foreign currencies at the point of boarding aircrafts apparently in facilitation for passengers. While the assessors found that there are combined security operations at the airports involving all security agencies, the efficacy of this arrangement appears doubtful given the sort of breaches earlier mentioned.

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8.2.5 The NCAA Act also creates the Accident Investigation Bureau as an autonomous Agency under Section 29 of the Act. The Agency investigates accidents and serious incidents and submits reports to the President. Some of the corruption risks identified associated with the work of this Bureau which, as many other agencies, has no specific anti-corruption policy are: inadequate funding for investigation of accidents in line with ICAO standards, airlines paying for the investigation of accidents including transporting investigators and accidented parts and discretionary award of incentives to personnel.

8.3 Nigerian Airspace Management Agency (NAMA)

8.3.1 This agency, created under the Nigerian Airspace Management Establishment Act Cap. 90, LFN 2010 is responsible for the provision of: Air Traffic Navigation Services, Communication Services, Air Traffic Surveillance Services, Air Traffic Management Services, Aeronautical Information Service, Aeronautical Chart Service, Search and Rescue Services, Surveillance Services and Flight Procedure Design Services etc. The agency manages the over 300,000 aircraft movements annually including the provision of flight information services to helicopter movements in the Niger Delta involved in oil exploration. These services are provided within the airports and along the flight paths within the Nation's airspace. While the services rendered by NAMA are purely technical with little human contact; corruption risks were identified at its billing section where agents for chartered private jets process billing for approved non-scheduled local flight plan, clearance permits for non-scheduled foreign operation and bulk payments for future foreign operations without reconciliation. The absence of automated billing and the payment of bills by cash rather than e-payment or through the banks make such activities liable to possible compromises with officials to reduce costs.

8.3.2 Other than the principal agencies, FAAN, NCAA and NAMA, other agencies by virtue of their legislation or administrative arrangements also operate at the airports. These include:

8.4 Nigeria Customs Service (NCS)

8.4.1 Consistent with the Customs and Excise Management Act, Cap45, LFN 2010, the services of the Nigeria Customs Service at the airports and Cargo terminals are principally to facilitate trade, revenue collection for the government through the valuation of goods and receipt of custom duties,

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enforcement of compliance with the contents of the prohibition list, ensuring proper currency declaration by travellers and generally to implement the fiscal policy of government. The Service has issued two pamphlets for the guidance of passengers viz: Passengers Import Prohibitions/Absolute Prohibitions and Export Prohibition Lists and Concessions to Passengers which specifies exemptions from import duty and advice on the dual channel system for travellers with 'goods to declare' or 'nothing to declare'. Assessors observed that this dual system is non-operational as all passengers have only one exit out of the airport on arrival. This may be due to space constraints or the on- going renovation at the airports. While the green channel does not guarantee unfettered privilege to passengers from checking, if it were functional there would be a reduction of the high rate of human contact with virtually all arriving passengers.

8.4.2 Furthermore, the distribution of these two pamphlets appears to have limited penetration with the travelling public. Perhaps if these documents are distributed during check-in and arrival, it will help to properly guide passengers many of whom often argue with officials on due charges to be paid. This lack of information or clarity on what is prohibited or dutiable generates corruption risks as the officials are now tasked to exercise their discretion which may be done in a manner that will enable compromise for a benefit from the defaulting traveller. On the other hand, such situations calling for exercise of discretion will create opportunity for superior officials or professional colleagues from other services to intervene on behalf of the passenger to avoid or evade payment of due duty thereby posing risks of corruption as such facilitation by colleagues is often at a fee or charge.

8.4.3 Assessors equally found that some of the taxes charged by FAAN and NCS on baggage and cargo are duplicitous. Such situations create opportunities for corruption as owners of goods seek the help of officials to compromise and reduce the charges or avoid paying them completely if possible.

8.5 The Department of State Security Service (DSS)

8.5.1 The Department of State Security Service created under the National Securities Agencies Act Cap. 74 LFN 2010 is charged with the responsibility of intelligence gathering and internal security of the airports consistent with Section 2(3) of the Act. The Service also ensures that illegal and prohibited items such as arms and explosives are not allowed in and out of the country.



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It keeps and operates a watch list of persons of interest and participates with other agencies at the airport to conduct joint operations. It chairs the Anti-corruption Committee of the Airport Security Committee. It interfaces with passengers especially during immigration checking for departures. This is a risk area that may be avoided particularly if the Service can perform its duty of watch-listing persons of interest from the back-end without the need for direct contact with all passengers. The use of Advance Passenger Manifest for example may be utilized to watch out for particular passengers of interest and pick them up when necessary without the need to interface with all traveling passengers as is the current procedure.

8.6 Nigeria Immigration Service (NIS)

8.6.1 The responsibility of NIS under the Immigration Act, Cap.11 LFN, 2010 includes examination and inspection of travel documents and endorsement of passengers, crews and all persons entering or leaving Nigeria, control of members of crew of aircraft, power to refuse entry or admit persons into Nigeria and removal of immigrants where entry is refused.

8.6.2 Endorsements during departures and arrival are the most prone to corruption. Official discretion for example, to allow entry of foreigners with re-entry visas may be abused; although assessors were informed that re-entry visas are no longer permitted. Also due largely to the illiteracy of many passengers particularly first-time travellers on their rights as contained in the NCAA Consumer Protection Directorate's "Know Your Rights and Responsibilities", some unscrupulous officials extort monies from them under the pretext that their travel documents are irregular or incomplete. Assessors also found that such unwholesome practices are perpetrated on passengers by the ubiquitous touts at the terminal entry or check-in points because they understand the psychology of first-time travellers and take undue advantage of their ignorance.

8.6.3 A common corruption risk is the activities of protocol officers who abuse their positions by collecting multiple passports from VIPs and other passengers for endorsement and express passage. This facilitation for speed often comes with a gift.



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8.7. National Drug Law Enforcement Agency (NDLEA)

8.7.1 NDLEA is a creation of the National Drug Law Enforcement Agency Act Cap, N30 LFN 2004. NDLEA is the agency responsible for the interdiction and investigation of illicit drug trafficking at the airports. The operational structure of the Agency within the Airports is segmented into beats. Inadequate automation of processes for scanning for drugs has necessitated physical and manual checking of passengers and their luggage. The existing scanners also do not capture all types of illicit drugs.

8.7.2 The constant contact with passengers predisposes some officers to compromise and abuse of their positions. Sometimes other security officials in collaboration with airline and other non-official staff facilitate drug couriers. The recent case of drug trafficking involving Arik Airline staff is instructive. A drug cartel had infiltrated Arik Catering staff, and used an attendant to subvert airport security by concealing 20kg of cocaine worth over N100m in catering supplies. The Agency reacted by directing that henceforth all airport workers should be subjected to searches. That presupposes that they were not searched in the past and if they were, the search was not thorough or compromised or both. (The Punch, Friday August 28, 2015 pg.2). While the Agency reports that it conducts polygraph test and vetting on staff, there might be need for its internal affairs department to keep a tab on staffs whose lifestyle is above their means. It has also become necessary to shorten the period within which staff work in the airports to stem familiarity which gives sufficient time for cartels to penetrate them. The recent case at the Akanu Ibiam International Airport, Enugu in which two NDLEA officials were indicted for their involvement in the illicit business is a pointer to the fact that drug cartels will always attempt to use airport officials particularly NDLEA officers. In this case which is now before the Federal High Court Enugu, an Operations Manager of Ethiopian Airline, a Supervisor with NAHCO, a ticket and baggage staff of the airport worked in concert (The SUN November 14, 2015 pg. 3). If this happened in the less busy airport in Enugu, the risk is higher in the ever busy airport in Lagos or Abuja.

8.8 The Nigeria Police Force (NPF)

8.8.1 The key role of the Police at the airport is general crime prevention, airport perimeter watch, bomb detection and anti-terrorist activities. The police operate at the land side, terminal building, and air side. They also search,



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arrest and detain persons found to be dangerous or causing nuisance at the airport. The security and traffic control at the car park where passengers disembark by the terminal entrance is also provided by men of the Nigeria Police.

8.8.2 Posting of officers to the airport is discretionary with no specific guidelines. Given their area of coverage, the Police are the frontline service to combat touting at the airports. The persistent and nagging problem of touting continues to pose the risk of not only corruption but also other security risks as passengers have fallen victim to extortion or loss of luggage to touts. Theft of vital equipment at the airside is also reported. The Police therefore need to step up their game to chase away these touts permanently from the airports. If touts are not allowed to operate around the park area or terminal entrance, they cannot gain access to the terminal building or other areas in the airports. Touting is a crime and should be seen as such. The present situation in which the Police, FAAN, NCAA and other security agencies throw their hands up in frustration gives the impression that the problem is insurmountable. That cannot be the case. The Police and the other services must rise up to the occasion to permanently defeat touting in the airports because the risks it poses are monumental.

8.9. Division of Port Health Services (DPHS)

8.9.1 Established in 1925, Port Health Services is a Division of the Department of Public Health of the Federal Ministry of Health. It operates at the international points of entry and departure at the airports pursuant to ICAO Regulations and the International Health Regulations (2005) of the World Health Organization (WHO). Domestically, it derives its power from the Quarantine Act Cap Q2 LFN 2010, the Quarantine (Aircraft) Regulations, 1968 and other Public Health Laws in Nigeria. Broadly speaking, the functions of the Port Health Services is the provision of environmental health services; supervision of service providers and medical services. It prevents, proactively assesses potential health risks and responds as appropriate. It also inspects aircrafts and food premises within the airports.

8.9.2 It also vaccinates and administers Yellow Cards to travellers. This function potentially exposes some of its officials to the risk of corruption particularly when travellers do not possess Yellow Cards which is a compulsory travel requirement for some countries. Often, travellers do not educate themselves of those requirements with the result that when they become aware at the departure point, they become desperate to acquire the Yellow Cards.



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However, a condition for the issuance of the card is appropriate vaccination. Travellers nevertheless want to obtain the Card without the requisite vaccination which ought to have been administered at least ten days before the day of travel. This creates an opportunity for negotiation with some of the officials who collude to issue the card in return for gratification which the passenger has to pay. This is in addition to paying a small official fee to the government which is receipted for in cash. Sometimes backdated Yellow Cards are issued to comply with requirements and the traveller is allowed to check-in. Such officials also use the opportunity provided to demand for all manner of gifts from travellers.

8.9.3 Assessors also found that touts have capitalized on this situation.

They extort from unsuspecting passengers and sell to them genuine/ fake Yellow Cards at unreasonable cost.

8.9.4 Assessors further established that the morale of the DPHS officials, who operate purely as Civil Servants, is very low. Staffs also do not receive any specific training on ethics. While they confirmed that they have an internal SOP it does appear that very little attention is paid to it. Posting of officials to the airport is not based on any set criteria and such posted staffs remain on the airport beat for an inordinately long time. This long period provides opportunity to cultivate rapport with food vendors on whom inspection is conducted thereby creating avenues for abuses and compromises.

The following agencies also operate at the airport under an administrative arrangement and necessity rather than by law:

8.10 Nigeria Agricultural Quarantine Service (NAQS)

8.10.1 The Nigeria Agricultural Quarantine Service is a department of the Federal Ministry of Agriculture which operates at the airports under an administrative arrangement. Its operations are guided purely by the public service rules. It is charged with the responsibility of monitoring the movement of agricultural products across international borders, enforcement of regulatory guidelines on the movement of agricultural products, certification of agricultural products for export, enforcement of the Animal Disease Control Act and granting export permits through the Federal Ministry of Agriculture for agricultural products.



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8.10.2 None of the processes conducted by this department is automated neither is any of its officials given any training on ethics. Assessors found that passengers are not aware of the information regarding the type and quantity of agricultural products allowed the travelling community. It was also found that the morale of the officials of this department is particularly low because of poor remuneration compared to other agencies operating at the airports. Under this circumstance, their constant interface with passengers carrying various food items provides opportunity to make demands and extort. That is particularly so when officials demand that certain products are subjected to examination, the billing of which the passengers have to pay by cash. There is also pressure by either VIPs or fellow officials to compromise the actual quantity of food items to be transported.

8.11 Nigerian Aviation Handling Company (NAHCO)

8.11.1 NAHCO is a publicly quoted company and its operations and services span both the International and Cargo Terminals of the airports. Its activities include: Check-in coordination for airlines, accepting baggage and collection of boarding passes on behalf of airlines, loading and offloading of cargo from airlines, cleaning of aircrafts between flights, and cargo handling (imports and exports). Officials of this company interface greatly with passengers and cargo, due largely to the non-automation of its processes. Weighing luggage is very important in airport operations as this determines the appropriate weight an aircraft is to carry subject to its capacity. However, because weighing machines at the airports are not regularly calibrated, an opportunity is created for NAHCO officials to collude with passengers at check in to under-weigh luggage in return for a fee. This poses both a corruption and safety risk. While the company represents that it has an SOP with a zero tolerance for corruption enshrined in it and a vetting and training policy on its staff, assessors could not establish any discernible evidence of a robust implementation of the anti-corruption policy or how regular training of its staff has impacted on their ethics and morals as pilfering, stealing and tampering with passenger baggage which though may have reduced, nevertheless still occur. Worse still, the company has no gift policy in spite of its zero tolerance for corruption.

8.12 Limousine Transport Shuttle Union

8.12.1 The Union operates both car and bus shuttle service for passengers. It operates from FAAN designated car parks. Members of this Union whose numbers could not be ascertained and have no ethics policy, complained to assessors that extortion by security agents particularly by the Police at the

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THE LEGAL AND ADMINISTRATIVE REGIMES AND THEIR IMPACT ON AIRPORT OPERATIONS

car parks is commonplace. Vehicle Inspection Office (VIO) and Lagos State Transport Management Authority (LASTMA) officials were also named as extortionists. While reasons for the extortion were not provided, it can be inferred that those extorted from may not have valid permits at the time of extortion or may be touting. There is no justification whatsoever for the Police or other security agents to indulge in such conduct because they are there precisely to check, prevent and apprehend those involved in wrongdoing. By extortion, they are facilitating and encouraging bad behaviour and compounding the problem of illegal activity at the airports. It was also found that FAAN do not respond to complaints from the union members over excessive extortion by security agents. This also helps to exacerbate the risk of corruption as no one is apprehended or punished.

8.13 National Association of Government Approved Freight Forwarders (NAGAFF)

8.13.1 NAGAFF is an association of freight forwarders with a registered membership of 120 companies. Its operations at the cargo terminal are primarily to facilitate, participate in supply chain management, interface with all agencies operating at the airport on behalf of importers and exporters and analyze government policy as it affects freight forwarding and offer advice where necessary. The greatest corruption risk associated with the operations of members of this body as established by the assessors is the manual valuation of cargo and the deliberate delay in clearing goods on account of queries issued by multiple agencies including Standards Organisation of Nigeria (SON), National Drug Law Enforcement Agency (NDLEA), NPF, NAQS, and the National Agency for Food and Drug Administration and Control (NAFDAC). The policy of 24 hours clearance of goods is observed more in breach. Some of these queries are smokescreens to extort monies from clearing agents/importers. It was established that goods already cleared by Nigeria Customs Service and released, are sometimes impounded by other agencies after leaving the cargo terminal. This is largely motivated by the desire to extort. Furthermore, the organisation complained that there is no structured and safe platform to report such cases as doing so to superiors of the offending officials is not usually attended to or acted upon.



9.0 UNDERLYING ISSUES ACROSS THE AGENCIES AND THEIR IMPLICATIONS FOR CORRUPTION RISKS

9.1 The level of transparency of operations at the airport is still below acceptable standards. While some agencies are above others in this regard particularly those with little contact with the travelling community, it is nevertheless a common challenge among all the agencies. This problem is rooted in the absence of a unified SOP for officials and the reliance on multiple SOPs of their various agencies whose standards may not necessarily be in accord with ICAO. This creates risks of corruption. A unified SOP ought to be the guiding operational road map for all agencies at the airport. This should be a good practice and cannot be in conflict with individual SOPs of agencies because each agency is there principally for the objective of enhancing Nigeria's socio-economic wellbeing through the provision of safety and security. Secondly, there is no structured composite training for all officials posted to the airport to raise their level of integrity and ethical conduct. Thirdly, the posting of officials to the airport is discretionary and sometimes dictated by ulterior reasons. This may not be in consonance with integrity nor have any regard to the reputation of the aviation industry or the country. Lobbying by officials and even payment of bribes to superiors to be posted to the airports in Lagos and Abuja were reported in some cases. Some of the officials remain in the airports for upwards of 4-5 years before being posted out and work their way back sooner than later. Such officials pose a risk of corruption from the inception of posting as they see their presence in the airport only from personal interest to acquire illicit wealth.

9.2 The two principal agencies in the aviation sector, FAAN and NCAA are not operating autonomously and with the independence outlined in the 2013 Federal Government-approved National Policy on Aviation. There are complaints of overbearing interference by the parent Ministry including recruitment of staff and procurement. FAAN still operates largely as a Civil Service outfit and cannot proactively address certain issues including discipline without reference to or clearance from the Ministry. All airport equipment is procured by the Ministry with little input from FAAN. While the Ministry statutorily has oversight responsibilities on its agencies, this ought to be restricted to matters of policy. When board oversight is added to this, FAAN and NCAA may not be able to optimally perform their core responsibilities and achieve set objectives under a heavily constricted environment which also has potentials for corrupt behaviour.



UNDERLYING ISSUES ACROSS THE AGENCIES AND THEIR IMPLICATIONS FOR CORRUPTION RISKS

- 9.3 VIPs are a high risk of corruption in airport operations. They offer gifts or bribes to airport officials without request. In expectation, they want express passage without due security screening for themselves, aides and associates and refuse to declare currencies above the threshold of USD10,000. Some VIPs engage officials as facilitators or protocol officers who procure ODCs to perform unofficial illegal duties. The official protocol services meant for qualified senior officials are abused in exchange for gifts. The EFCC 2012 Annual Report indicated that over USD\$10 billion was transported through the airports in less than two years. Much of this was through the Lagos and Abuja airports. Although some of this money was declared, the legitimacy of the source of this huge sum remains doubtful.
- 9.4 Staff of other operating companies including Concessionaires and contractors are also not profiled or vetted by FAAN. The implication is that persons of questionable character may be recruited to work at the airports. Staffs of some of these companies are poorly paid and survive only on gifts or tips. Perhaps this explains the several cases of collusion for the transportation of drugs and or cash that have been a regular occurrence. Not too long ago, a cleaner was, for example arrested with \$250,000 which he was apparently facilitating for a passenger. Some of the commercial shops allocated spaces at the terminal building cannot also justify the huge rents paid to FAAN in relation to the overt business they conduct. It was pointed out to the assessors that such shop owners or their collaborators may only be using their shops as a cover to conduct illegal activity.
- 9.5 Touting is a common feature at the airports and no concerted efforts have been made to address the problem permanently. Touting activities run through the whole gamut of airport operations and it is one of the greatest corruption risks at the airports. Assessors confirmed that some security officials not only facilitate touting but sometimes are directly involved in touting themselves for pecuniary benefits. Touts also have godfathers at the airport who intercede for them when they run into trouble and because many of them are ex staff of the airport they easily win the sympathy of other workers who are usually eager to facilitate their entry into the airport. Each agency appears to shift the blame to FAAN. However, the problem persists because of lack of consensus and the will to collaboratively combat the menace. The security agencies work in silos and often see themselves as rivals which is made worse in the face of some overlapping functions, improper sharing of information and ineffective collaboration. This situation has created a gap of lack of checks and balances which results to



UNDERLYING ISSUES ACROSS THE AGENCIES AND THEIR IMPLICATIONS FOR CORRUPTION RISKS

embarrassing conflicts from time to time. The monthly Security Committee meeting appears to be an inadequate platform to bond and synergize operations in the airports that run a 24-hour business.

- 9.6 A common corruption risk running through most of the agencies is the absence of a gift or a comprehensive anti-corruption policy. Where it exists as in the case of FAAN, there is no adequate understanding of its purport and essence. Many officials cannot distinguish between a gift; a bribe or a tip. Assessors found that while the agencies do not expressly permit officers to collect gifts, most officials do not see anything wrong with it on the basis that it is common practice in the society particularly when the giver is not coerced to give. Perhaps that explains why officials engage in excessive greetings and unnecessary pleasantries with travellers to win their friendship in expectation that they will part with something. Structured in this way, it is difficult to say that the official is soliciting or demanding for gratification since he does not say so expressly and may not therefore be reported by a passenger who chooses to in accordance with Article 11 of the NCAA "Consumer Digest on Air Travel". The corruption risk posed however is that an official who has received a gift from a passenger even if prodded to give willingly cannot be otherwise thorough in his job as he should. Conversely, an 'uncooperative' passenger is likely to be subjected to a more than usual screening to get him to 'cooperate' or whip him in line next time.
- 9.7 The seeming general acceptance of gifts, bribes and facilitation as normal also explains why 'positive deviant' officials at the airport who step out to correct wrongdoing receive threats allegedly from colleagues and touts who are involved in these illegal activities. Some of the officials have become so complacent that they advise colleagues who attempt to correct the system not to waste their time as similar efforts in the past had failed. This again speaks to the risk of allowing officials to work for so many years at the airport without re-deployment. Officials whose minds are fixated on corruption and who have worked for so many years at the airport continue to negatively influence others and foul the system.
- 9.8 There is a huge problem of lack of automation of processes, inadequate or absence of basic equipment including scanners, conveyor belts, CCTVs at the airports. This is responsible for the congestions and delays and the inevitable but avoidable human contact between officials, travellers and



UNDERLYING ISSUES ACROSS THE AGENCIES AND THEIR IMPLICATIONS FOR CORRUPTION RISKS

cargo freight agents which create opportunities for corruption. The Ministry, FAAN and NCAA need to be ingenious and creative in sourcing requisite funds to close this yawning gap that is taking a toll on integrity and transparency.

9.9 The various laws, regulations and Staff Handbooks of agencies provide for the conduct and discipline of personnel. Even in the absence of any anti-corruption policy in some agencies, the provisions of the Code of Conduct Bureau (CCB) Act under Schedule 5 of the 1999 Constitution as amended and the ICPC Act that has elaborate provisions for integrity in the public service ought to be fully elaborated and applied. However, it was observed that the implementation of the sanctions regime across agencies is grossly ineffective and has thereby occasioned very low deterrent effect. Some officials confirmed that while most of the complaints border on extortion, those against whom the complaints are made are only invited for counseling or reprimand. The commonest sanction is re-deployment which is not enough to discourage misconduct. Dismissal, prosecution and wide publication of the results will send the right message. Assessors were not obliged with statistics of officials sanctioned, the type of sanctions applied and for what offences. However, NDLEA reported a good practice that some of its officers involved in corrupt conduct were investigated and prosecuted and one of them is presently serving a 7-year jail term.

9.10 There are some organisational arrangements that appear to negatively impact smooth operations at the airports. The subservience of FAAN, NCAA, AIB and NAMA to the Ministry beyond issues of policy has implications for transparency including the integrity of recruited personnel; their deployment; funding and procurement of important equipment which impact operations by increasing human contact and causing delays etc. All these create opportunities for corruption. There might be need to amend some of the laws to bring them in conformity to ICAO standards. It was observed for example, that the report of the AIB is submitted to the President through the Minister. The report going through that procedure is liable to manipulation with concomitant corruption risks. The best practice is that after investigation, the Bureau should go ahead to publish its findings without recourse to any Minister. The delays associated with clearing goods at the Cargo Terminal beyond the 24-hour rule are sometimes deliberately caused by officials in order to create room for negotiation since owners of goods want to avoid costs associated with goods not cleared within time.



UNDERLYING ISSUES ACROSS THE AGENCIES AND THEIR IMPLICATIONS FOR CORRUPTION RISKS

- 9.11 There is no clear, targeted and overarching anti-corruption strategy at the airports for the guidance of all officials and the public. Very little premium is placed on integrity. Tone at the top is also not too pronounced by the management of some of the agencies yet this is critical to any anti-corruption programme. Officials of some of the agencies received spattering training on ethics but often not on a regular basis. Some have not received any specific training on ethics other than the general training given during recruitment in their various agencies. Officials who refer to their agency's anti-corruption policies or Code of Conduct give very little regard to them in practice. This perhaps explains the easy rationalization of corruption by officials who try to embellish such conduct as normal practice using poor pay or compensation as justification. With the exception of FAAN and NAMA, virtually all the agencies complained of poor remuneration. Combined with the opportunity provided by the wide discretionary power enjoyed by officials, the absence of safe reporting of complaints and protection of those who blow the whistle, the risk of corruption becomes even more heightened. Travellers themselves have been unhelpful in this regard as they oblige officials with gifts to speed through screening, compromise baggage check and avoid red tape.
- 9.12 While the airport monthly Security Committee meeting comprised of all the services is meant to review operations, address challenges and recommend policy changes where necessary, there was no indication during the assessment that the reports of this important Committee are constantly being reviewed and evaluated under a shared responsibility and implementation of recommendations followed up with a robust feedback mechanism. Some of the officials who are courageous and have spoken against corrupt conduct by colleagues receive regular threats to their person but there is no indication that there is any arrangement in place to give them adequate protection.

10.0 THE PASSENGER SURVEY

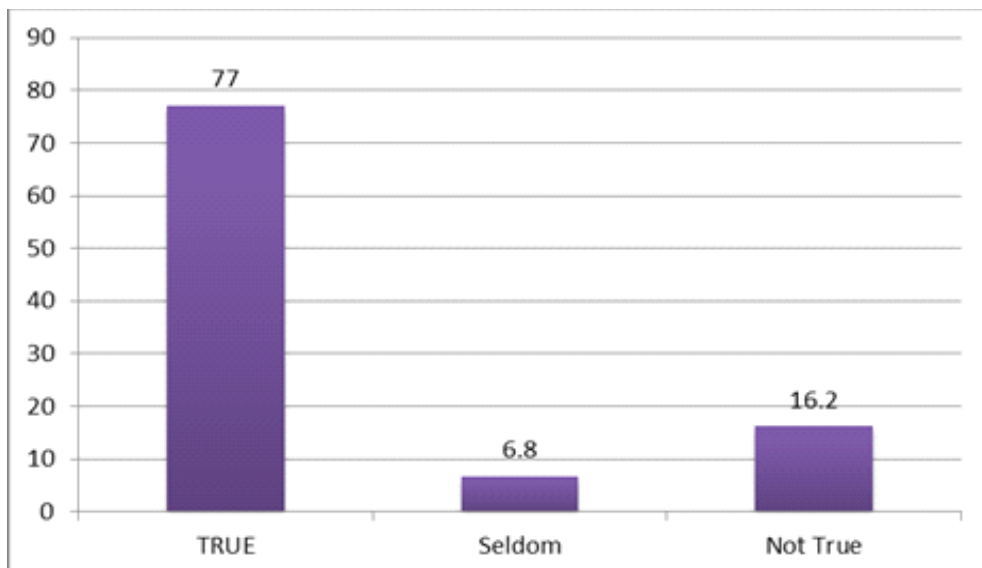
10.1 Data Collection

10.1.1 As indicated earlier, a component of this CRA was the administration of questionnaire to collect data from the travelling public. This was to afford respondents the freedom to respond to the issues under examination with a view to extracting meaningful responses without the extraneous influences which the use of interviews may impinge on their willingness to answer questions honestly. In all, a total of 1070 questionnaires bearing 28 questions were administered on randomly selected respondents in the course of this assessment. At the end of the survey, 969 respondents (representing 90.6%) filled and returned their inventories.

10.2 Data Analysis

10.2.1 The Statistical Package for Social Sciences (SPSS) was used to analyze the data generated. The multivariate analytical tools provided by the package were used to deal with the different data collected. Filled questionnaires were labeled and the questions were codified and entered into SPSS data file. The use of multivariate statistical tools facilitated the reduction of distributions of the research data to meaningful indices for quick understanding as presented below.

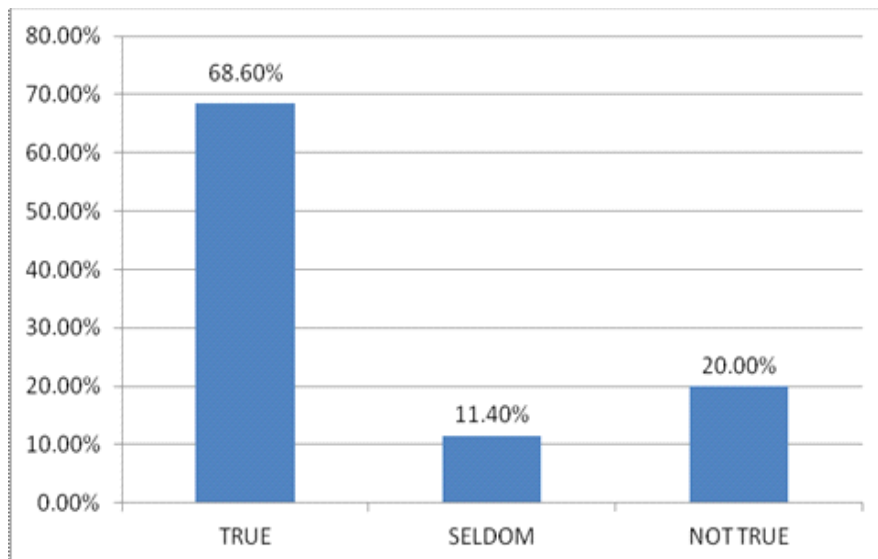
Figure 1: *Percentage Distribution of responses to whether respondents travel through the Airport Often*



THE PASSENGER SURVEY

77% of the 969 respondents in this study reported that they travel through the Abuja and Lagos International Airports regularly and so they are very knowledgeable to take part in a Corruption Risk Assessment of the two International Airports.

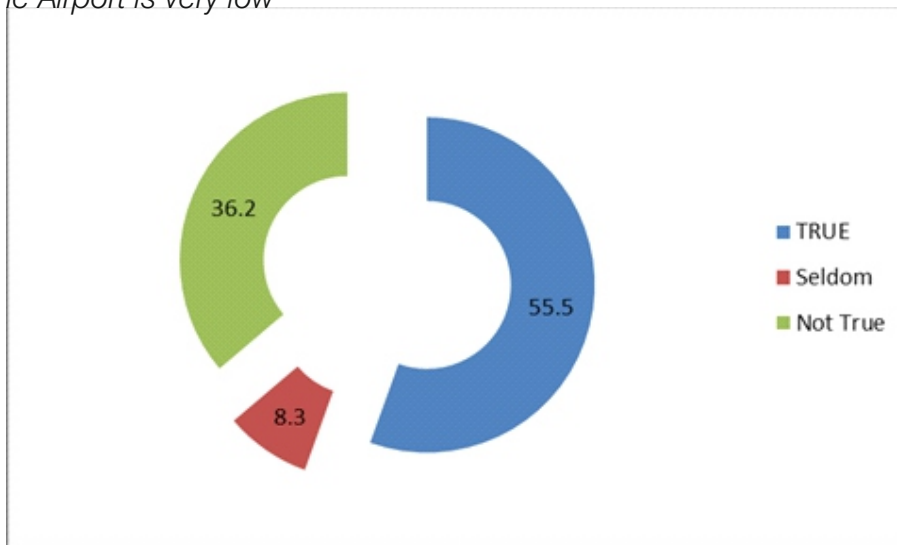
Figure 2: *I have Pleasant Experience travelling through the Airport*



Asked if they have had pleasant experiences travelling through the airports, 68.6% of the respondents agreed. While a little over a quarter of the respondents said they have not had such pleasant experiences travelling through the airports. This appears to be consistent with officials' position that much of the bribes, gifts or tips are paid unsolicited and voluntarily by passengers which means they do not feel bad nor are they offended by dropping gifts to officials on duty.

THE PASSENGER SURVEY

Figure 3: Percentage of Respondents' opinion that Integrity of Officials at the Airport is very low

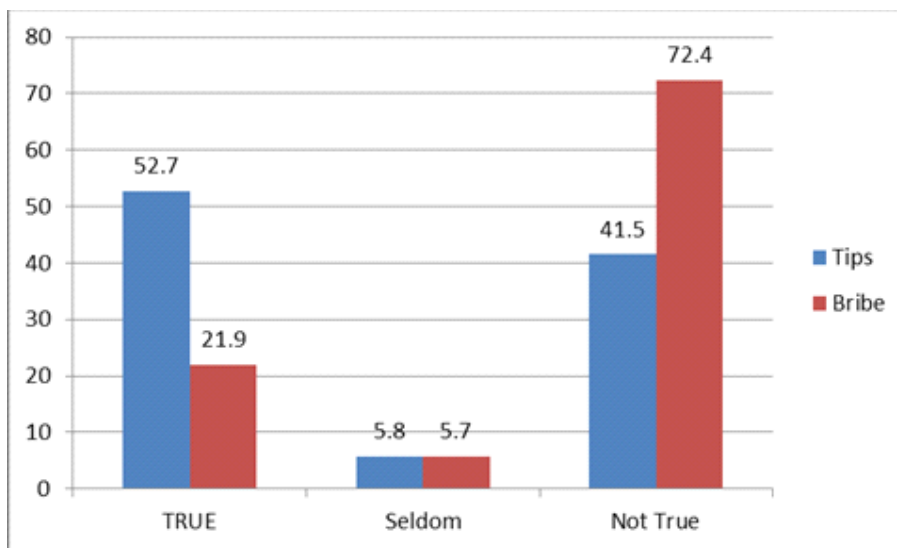


55.5% of the respondents opined that the integrity of officials at the Airports is very low. This response speaks to the specific question posed on the level of integrity of officials and several other questions which sought passengers' views on the uprightness of officials in the course of performing their duties. From the analysis of the responses, corrupt behaviours occur within two different social, political and economic situations. The first is where individuals misuse public office for personal gain. This type of corruption takes place in a modern, rational, bureaucratic system, where social values support bureaucratic procedures and corrupt behaviour violates procedures, laws and larger societal expectations for appropriate behaviour.

In the second situation, the problem is not crooked individuals but a system where corruption is embedded in society. In this case, corruption is institutionalized and becomes the norm rather than the exception. The extensive literature on patronage and 'big man politics' stands as testimony that, for many observers of Africa, corruption is a core element of the state and society (Lavena, 2013; Lipset and Lenz, 2000). Under these circumstances it is easy to rationalize corruption as officials in the airport do because they are part of the society and one cannot be different from his society.

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Figure 4: *Percentage Distribution of Respondents' willingness to pay tips and Bribes to Airport Officials*



Here, 72.4% of the respondents said they will not pay bribe to officials at the Airports for any reason while only 21.9% said they will pay bribe if need be. On the flip side, asked if they always give tips to officials at the airports to fast-track their screening process, 52.7% of the respondents agreed that they have had cause to give tips to airport officials. A major point to highlight is that corrupt actions are perceived differently by the respondents. That is why despite abhorring corruption, respondents tolerate and in fact engage in giving tips to officials to short circuit their screening at the airport. The argument by (Thomas, 1923) that “if men define situations as real, they are real in their consequences” is still apt, relevant and contemporary in this regard.

There is need to conceptualize corruption in such a way as to lend the concept readily to cross-cultural understanding. In their classification, (Peter and Welch, 1972) observed that corruption can be “black,” “white,” or “gray.” According to them 'Black' corruption involves actions considered by both the public and public officials as particularly abhorrent and therefore requiring punishment. 'White' corruption they noted, might be acts deemed corrupt by both the public and officials, but not severe enough to warrant sanction. While 'gray' corruption involves those actions found to be corrupt by either one of the groups, but not

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both. The authors argued that the importance of such variations in attitudes is clear: “what may be corrupt to one citizen, scholar, or public official may just be politics to another or discretion to a third”. The point being emphasized is that if a society defines certain behaviours as corrupt and then supports the legal system in enforcing that definition, then, and only then, will the legal system be able to enforce ethical standards effectively and over a long period of time. However, if a society defines certain behaviours as not corrupt but the legal system defines them as corrupt; the legal system may not be able to enforce legal standards of ethical behaviour.

Table 1: *Security screening procedures are deliberately cumbersome*

	Frequency	Percent	Valid Percent
No Response	74	7.6	7.6
True	431	44.5	44.5
Seldom	83	8.6	8.6
Not True	381	39.3	39.3
Total	969	100.0	100.0

44.5% of the respondents agreed that the screening processes at the airports are deliberately cumbersome. This finding is in tandem with the argument that corruption involving abuse of power often takes the form of creation of cumbersome processes to cause delays in order for those who ought to enjoy free services from an official to be discomforted and coerced to pay bribes to overcome the red tape.

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Table 2: *Officials often expect Tips from Passengers during Security Screening*

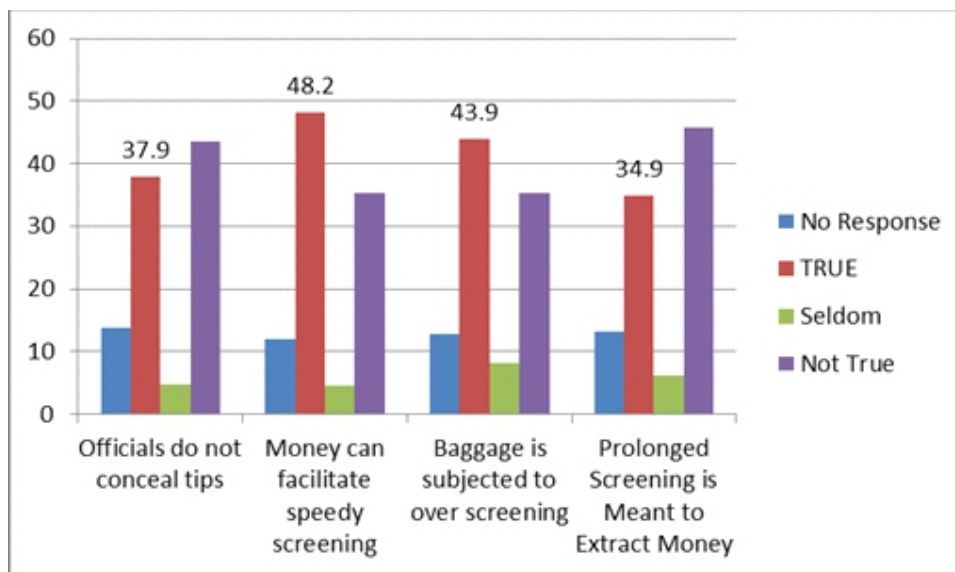
	Frequency	Percent	Valid Percent
No Response	37	3.8	3.8
True	426	44.0	44.0
Seldom	71	7.3	7.3
Not True	435	44.9	44.9
Total	969	100.0	100.0

44% of the respondents averred that the officials at the airports expect tips from passengers while carrying out their duties while 44.9% of them think otherwise. The underlying area of convergence is that corruption is sometimes perceived as one of the coping strategies developed to top up incomes of low-level publics and so they need not necessarily ask for tips and/or bribes but when given they take as they intuitively expect people they consider better placed in society to give to them.

Comparing this finding with the general findings that staffs of most agencies are poorly paid and working with low morale, there is the high expectation that travellers should augment the income of officials through gifts and tips.

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Figure 5: Bar Chart showing percentage distribution of responses to four different questions



37.9% of the respondents reported that officials do not bother to conceal tips they receive from travellers, apparently because they see this as normal practice and because no mechanism/safeguard is in place to check the officials. 48.2% agreed that payment of money can facilitate quick and prompt attention at the airport. In effect, it can be understood when 34.9% said prolonged screening is meant to extract money from passengers. When people are travelling, most times they are late and want to move very quickly, so anything that would fast-track their passage, they do without hesitation. Having known that giving tips will switch the mood of the officials to give them swift thoroughfare, passengers are more likely to just put that forward to give them speedy clearance. In other words, the corruption problem at the airports is a quid pro quo. Both officials and the travellers are involved in the exchange. While officials capitalize on the absence of automation of screening baggage to delay travellers in order to extort from them; travellers on the other hand are often impatient to wait for the normal screening to be done to avoid lateness for travel. They therefore pay speed money to avoid delay.

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Table 3: *I have Never Reported a Case of Bribery or Extortion against an official*

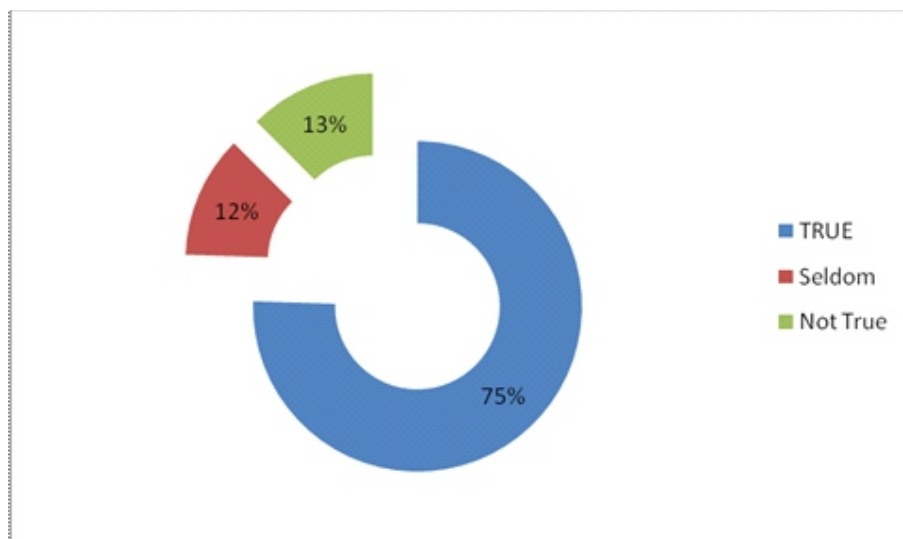
	Frequency	Percent	Valid Percent
No Response	69	7.1	7.1
True	729	75.2	75.2
Seldom	7	.7	.7
Not True	164	16.9	16.9
Total	969	100.0	100.0

As a corollary to the fact that respondents consider the behaviour of officials as normal, 75.2% of the respondents said that they have never reported any case of corruption against anyone as it relates to the conducts at the airports. Ingram and Urle (2004, Pg.12) submitted that in the Cook Islands, 'people will rather live with the consequences of corrupt politicians than face losing their jobs' as he talked about 'fears of reprisal'. Similarly, Shuster (2004) observed that in Palau, people find it difficult to correct or discipline or even report that a friend, relative or co-worker is behaving in a corrupt manner. Subtle scorn, he noted is preferred to overt rebuke, and indirectness is seen as a good quality (Shuster, 2004 Pg.27).

The findings here are also consistent with that of the oral interviews with officials. Although there are no statistics provided, assessors confirmed that there are few reported cases against officials at the airport. First, there is no effective system in place to report cases safely by the public. There is therefore fear of reprisals. Secondly, even the few cases reported are hardly acted upon beyond the administrative action of redeployments out of the airport or reprimand. There is also no feedback mechanism to advise complainants on action taken. Importantly, officials who try to take up such matters against colleagues are threatened. The environment is therefore not conducive to report cases of corruption against officials. This makes the public, even if reluctantly, to condone rather than report corruption.

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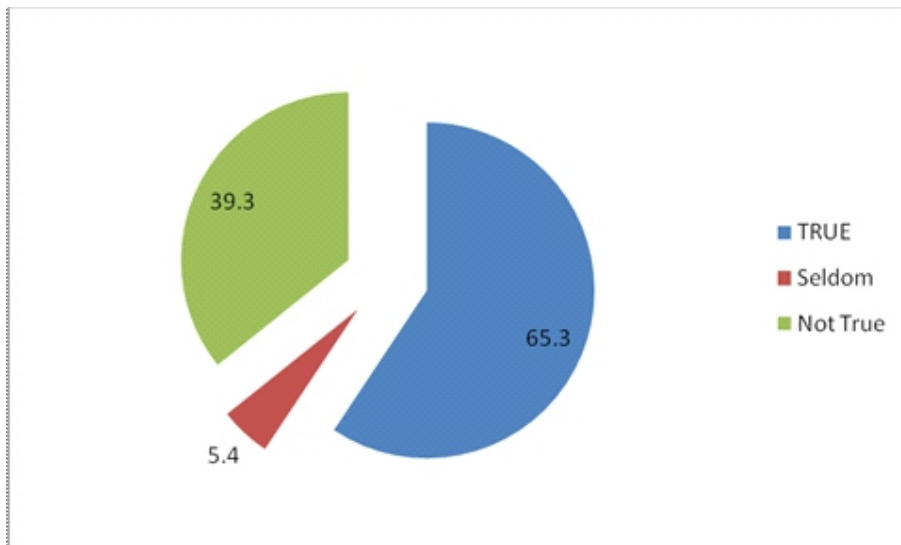
Figure 6: *Percentage Distribution of respondents' response to No Publicly Displayed information advising passengers on whom and how to report misconduct by officials at the airport*



A significant 75% of the respondents said there is no publicly displayed information at the airport advising passengers on whom and how to report misconduct by officials. Apart from the fact that respondents who give tips appear to be doing so without coercion, this response exposes a major gap at the airports. Without clear information on whom and how to report misconduct by officials, even passengers who feel the need to do so may not know how to go about it.

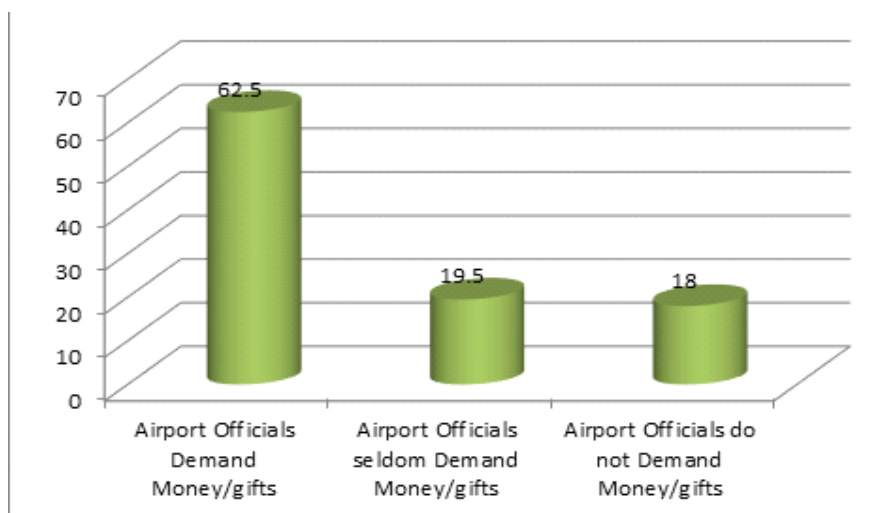
THE PASSENGER SURVEY

Figure 7: Percentage Distribution of respondents' response to whether the Attitude of Security Officials at the airports paints a negative Image of Nigeria



A huge number (65.3%) of those who responded to this question said that the attitude of officials at the airport paints a negative image of the country. That being the case, even though passengers do not frown at the attitude of security and other airport officials, they know that such behaviour does not conform with international best practices.

Figure 8: Percentage Distribution of Respondents' answers to whether Security Officials often demand Money or Gift from Passengers





THE PASSENGER SURVEY

Here 62.5% of the respondents asserted that airport officials demand money or gifts from passengers in the course of carrying out their duties. Only 18% of the respondents said airport officials do not ask for money or gifts from passengers. As to officials they have given tips and/bribes to, respondents mentioned that they have had cause to give tips to officials of all the agencies working in the airports.

This finding presents a kind of paradox when compared with the responses of Table 2 where almost equal number of passengers agreed and disagreed that officials at the Airports expect tips from passengers. The only explanation for this disparity could be that while in that other instance, the question sought to get opinion of passengers (i.e their perception of officials) the question on whether or not officials demand money or gifts from passengers borders on actual experiences of the passengers over time at the airports.

One of the challenges to the study of corruption is therefore the issue of certain cultural practices such as the tradition of gift-giving used to explain away and/or excuse corrupt behaviour. Such traditional practices are known to fuel corruption as officials become drawn into kinship networks that place certain obligations on them. Many people across the world are however becoming intolerant of this kind of excuse. A brisk distinction between gifts and bribes was given by former President Olusegun Obasanjo who averred that:

“I shudder at how an integral aspect of our culture can be taken as the basis for rationalizing otherwise despicable behaviour. In the African concept of appreciation and hospitality, the gift is usually a token. It is not demanded. The value is usually in the spirit rather than the material worth. It is usually done in the open, and never in secret. Where it is excessive, it becomes an embarrassment and it is returned. If anything, corruption has perverted and destroyed this aspect of our culture” (Pope, 2000).

At variance with the above postulation is the argument that gift giving as a social norm is a remnant of the traditional past.

A decorative graphic in the top right corner of the page. It features several stylized airplane icons in orange and grey, positioned as if flying along a path of thick, curved arrows. The arrows are also in orange and grey, pointing towards the bottom right. The overall design is modern and clean.

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There are many weaknesses with the culture-induced account of corruption. The first being that this position suggests that social norms encouraging corruption are universal in Africa, without recourse to the fact that vocal opposition to corruption and anti-corruption campaigns have a long history in many traditional societies dated into antiquity (Melgar et al 2010; Obasanjo, 1987). The second weakness is that norm-based arguments are inclined to inviting tautology. This is because without a clear definition of norms or without empirical evidence showcasing their existence, one may erroneously argue that because a country has high corruption; its social norms must have been such that they favor corruption. It will therefore be unjustified to attribute the high demand for gifts or money by airport officials to Nigerian cultural norms or practices.

11.0 SUMMARY

The table below highlights the key assets of the aviation sector/airports, the threats posed to them and the corruption risk generated. The simple formula is: $A+T+V=R$. This means Asset + Threat + Vulnerability = Risk.

TABLE 4: SUMMARY OF IDENTIFIED CORRUPTION RISKS

S/N	ASSETS	THREATS	VULNERABILITIES	CORRUPTION RISKS
1.	Reputation	-Personnel -Obsolete Equipment -Degraded Service Standards	Inadequacy/Lack of training	Disposition to accepting gifts/tips and bribes by officials from travellers
2	Screening/Baggage/Security Surveillance equipment	- Government/Personnel -Lean budget/Non implementation	-Insufficient Scanners/malfunctioning equipment -Close contact with travellers -Low level of automation and computerization	-Payment of speed money to facilitate passages -Compromising and facilitating illegal transportation of currency -Under-assessment of taxes, tariffs and baggage for bribes and loss of revenue to government
3	Personnel	-Government -Private Companies -Society -Human resource management -Poor pay/Low morale -Poor work environment -Abuses by VIPs -Official discretion -No criteria/guidelines for posting officials	-Excessive discretion -Peer Pressure -Culture and greed -Inadequate training on ethics -Long duration of posting to the airport or particular beats -Interference by superior officials -No policy on gifts -Lax checking for	-Demanding or Soliciting gifts -Collusion & facilitation for money laundering and drug trafficking in return for bribes -Coercion to extort bribes for performing routine duties

SUMMARY

S/N	ASSETS	THREATS	VULNERABILITIES	CORRUPTION RISKS
			private jets users -Absence of whistleblower policy	
4	Government Aviation policy	Organisational/Administrative Structure -Multiple agencies -Overlapping responsibilities -Lack of tone from the top	-Absence of a centralized SOP -Disaggregated reporting lines and lack of coordination -Ministerial interference	Lack of professionalism with potential abuses of demanding and taking bribes
5	Trust amongst Officials	-Organisational culture -Ego and suspicion	Segregated and uncoordinated duties by officials -Absence of a centralized SOP	-High opportunity to collude, solicit and demand gifts
6	Stakeholder Agencies	-Absence of a Code of Ethics -Inadequate Implementation of general Code of Ethics -No defined policy on gifts -High desire to be posted to the airports -Legal structure	-Ethics not factored into operational processes at the airports -No background checks for some officials -Disregard of ethics by officials -Acting in silos and administration of multiple levies and taxes -Lack of understanding of Zero tolerance to corruption	-Rationalization of acceptance of bribes/tips and wrong doing by officials -Facilitating, obtaining and using ODCs for unwholesome activities for bribes or gifts

SUMMARY

S/N	ASSETS	THREATS	VULNERABILITIES	CORRUPTION RISKS
7	Terminal buildings/Access Roads/Car Parks	Poor design and difficulty in controlling access	-Easy access and operation by touts -Crowded departure halls -Compromises by security officials -High human contact with officials and non-officials	-Facilitation of bribes and tips using touts as agents -Potential extortion of travellers
8	High Integrity, Ethics & Disciplinary Standards	-Poor training and mentorship -Inadequate punishment of officials to deter others -Protection by senior officials -Threats to officials who insist on acting transparently.	-Administrative treatment of corruption cases -Low risk of detection -Collective action problem	-Officials' solicitation for gratification/bribes
9	Revenue	Lack of automation of payment systems and computerization -Weighing equipment not calibrated	-Manual assessment of cargo/baggage -Cash payments	Under-billing of cargo and baggage in return for bribes

SUMMARY

S/N	ASSETS	THREATS	VULNERABILITIES	CORRUPTION RISKS
10	Effective Communication	Illiteracy of the travelling community	-poor information dissemination of pamphlets on passenger rights and obligations including the right to resist bribery -Not knowing where and how to safely report corrupt officials.	-Payment of bribes or tips to officials by passengers rather than insisting on their rights. - Passengers are coerced to pay bribes or tips to stay out of trouble with officials
11	Travellers	-Officials' threats -lack of or inadequate screening/baggage equipment -Ignorance of first time travellers of departure procedures and requirements and passenger rights	Officials' disposition to collude with passengers for underpayment of baggage or cargo or carry food items not permissible. -Tendency to exploit first time travellers	-Collusion to pay bribes for under-assessed baggage or cargo -Extortion

12.0 RATING OF IDENTIFIED RISKS WITH WEAK OR NO CONTROLS

The table below rates both the corruption risks identified and the existing mitigating control measures in order to determine the residual risk remaining for each corruption scheme. This rating will guide in fashioning an appropriate response Plan.

TABLE 5: *Rating identified risks with weak or no controls*

	RISK CATEGORIES	INHERENT RISK	CONTROL RATING	RESIDUAL RISK
1	Bribery due to personnel orientation, societal and peer influence and low ethical conduct of officials	High	Ineffective	High
2	Demand for and acceptance of gifts due to absence of a gift policy and a standardized Code of Ethics for officials	High	Ineffective	High
3	Exploitation of excessive official discretion to demand for gifts/bribes	Medium	Partially Effective	Medium
4	Capitalization on lack of automation of systems, screening and other equipment leading to high degree of human contact to demand for bribes and gifts	High	Ineffective	High
5	Permissive attitude of officials to touting and collusion with touts to extort from passengers	High	Ineffective	High

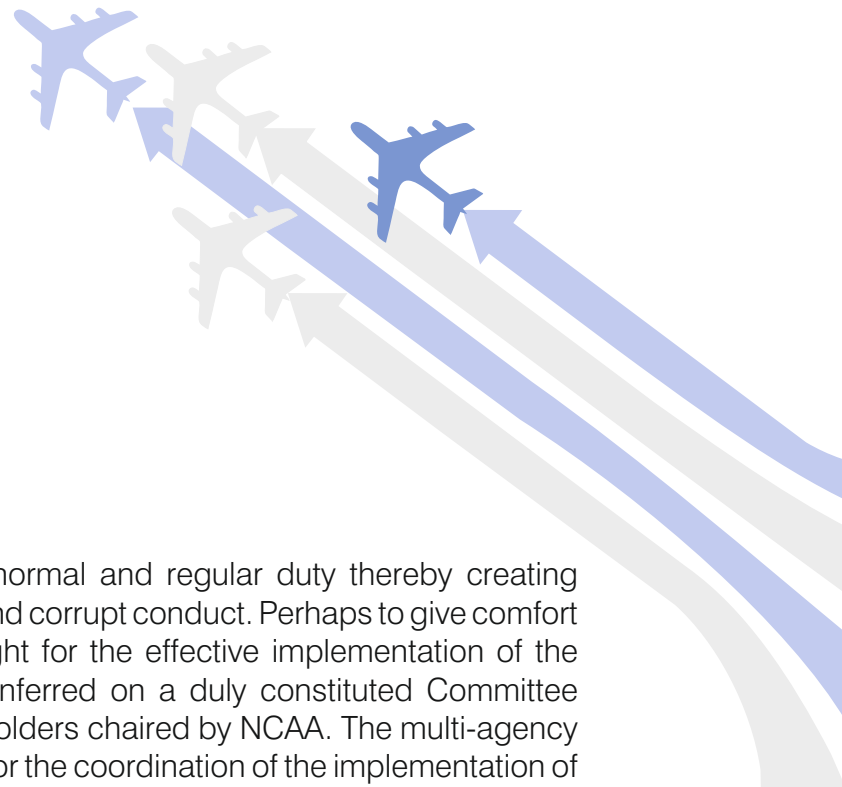
RATING OF IDENTIFIED RISKS WITH WEAK OR NO CONTROLS

	RISK CATEGORIES	INHERENT RISK	CONTROL RATING	RESIDUAL RISK
6	Abuses of the issuance and use of ODCs to facilitate VIPs for bribes and gifts	Medium	Partially Effective	Medium
7	Facilitation of money laundering and drug trafficking by officials of private companies, contractors whose backgrounds are not vetted	High	Ineffective	High
8	Low risk of detection due to collective action problem enabling bribery and facilitation payments	Medium	Partially Effective	Medium
9	The socio-cultural and economic environment which makes the tolerance level of corruption to be very high amongst officials and travellers alike enabling bribery, gifts and facilitation	High	Ineffective	High
10	Collusion for payment of bribes by passengers to secure under-assessment of duty, tariff, baggage charges, cargo etc.	High	Ineffective	High
11	Demand and acceptance of bribes to augment for the poor remuneration of officials of some agencies and private companies	High	Ineffective	High



13.0 RECOMMENDATIONS

- 13.1 The following recommendations are guided by the information supplied on the existing controls in place to address the corruption risks outlined above. They are synergistic but may be prioritized. From the overall rating of the risks and the controls, the residual risks remain high and the controls ineffective. Consequently, there is need to re-jig the existing controls to make them more effective and result-oriented and introduce new ones to change the corruption calculus. In this regard, active management involvement is needed on an ongoing basis and it is assumed that the management of the Aviation sector has determined its risk tolerance level of corruption at the airports. That is the risk the Ministry is ready to bear beyond which the core objectives of the sector will be negatively impacted. While this can be gleaned from the 2013 National Policy Document which expects the sector to deliver significant socio-economic benefits to Nigerians, it is expedient that the Minister of Aviation states what this tolerance level is. This is important so that all stakeholders are not in doubt. It will also help to galvanize the needed commitment for implementation and funding. It is important to note that a total elimination of corruption is unrealistic. The aim should be to increase honesty, efficiency, fairness, productivity and safety of the airports.
- 13.2 Corruption is generally about people and the organisations where they work. Therefore, the first approach for an effective treatment to a corruption problem is to look at controls that address risks posed by organisational arrangements and the disposition of people. The CRA found that there is near ethical crisis at the airport amongst most of its officials because of a combination of reasons: high tolerance of corruption in the absence of clarity on organisational policy on gifts, administrative arrangements that enable multiple agencies working together with no clear reporting lines and control from a central point, the greed to live beyond income, accentuated by poor wages and the desire to augment income with proceeds of bribes/gifts/tips. Segregated arrangements exist in the different agencies to address infractions but there is no evidence that this had been effective on account of which the residual risks remain high.
- 13.3 The first control therefore is to restructure the present arrangement through the introduction of a central SOP tailored specifically to airport operations which all the agencies working in the airports must adhere to. The central SOP should define in sufficient clarity which agency does what, how, where and at what time. While NCAA is not expected to dictate the specificities of operations for each agency, they should have the power under the SOP to police and step in if agency



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officials are going out of the normal and regular duty thereby creating potential room for indiscipline and corrupt conduct. Perhaps to give comfort to all stakeholders, the oversight for the effective implementation of the centralized SOP should be conferred on a duly constituted Committee comprising of the major stakeholders chaired by NCAA. The multi-agency Committee will be responsible for the coordination of the implementation of integrity laws and regulations, inculcation of integrity and discipline of officials at the airports under a centralized process.

- 13.4 The wisdom in this approach is that any organisational structure with multiple agencies and some overlapping functions working on different things that does not have an overall overseer or supervisor is bound to experience the kinds of problems that exist today at the airports including clashes between the services and sundry kinds of misconduct. The disciplinary procedure and measures to be administered by the Committee and its decisions should be such that stakeholder agencies will enforce them without much ado.

The ICPC ACTU at the airport, consistent with its mandate is expected to work with this Committee to guide and ensure compliance with both the SOP and the standardized central Ethics and Transparency Code by all agencies at the airports. Reliance on the different agencies' Codes, where they exist, tended to create confusion among personnel as to what really obtains. Some officials saw nothing wrong with gifts voluntarily given. Others felt otherwise. The airport environment is unique and should be guided by a Code that speaks to the special requirements of the Aviation sector as a hub and gateway to the nation's economic potentials and the ambassador of its reputation. The Code should clearly specify the policy on demand or acceptance of gifts/tips or bribes. Acceptable corporate gifts should also be clearly specified and to indicate that they are meant for the organisation and not the individual official.

While the Consumer Protection Directorate of the NCAA is statutorily provided for, it is advised that complaints received by this department bordering on corruption or breach of ethics should be forwarded to the Committee for treatment centrally under a shared spirit of responsibility.

13. 5 The National Policy on Aviation provides the vision and mission for the country's aviation aspirations. It recognizes the role of other agencies besides those in core aviation in helping to achieve set objectives. Therefore all agencies must key into that vision by subjugating their



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operations to a central control. While the agencies are constituted by different legislations and derive their power from there, these legislations are not at variance with the aviation policy but rather support and strengthen it.

- 13.6 The reporting mechanism for corruption and other misconducts should be structured in a manner to ensure safe reporting by the public or staff including anonymous reporting whether on line or offline including the use of hot lines. The different reporting procedures for arriving and departing passengers need to be urgently harmonized and calibrated to ensure that corruption complaints received are treated confidentially and expeditiously.

It is further recommended that FAAN/NCAA design a website similar to that of Ipaidabribe.com in India to guarantee safe reporting. The website will allow the public to post their bribe experiences under four distinct categories — I Paid a Bribe (captures incidences of bribery or extortion), I Am a Bribe Fighter (experiences where people resisted bribery or extortion), I Met an Honest Officer (recognizing honest officers) and I Do Not Want to Pay a Bribe (educating Nigerians how to avoid paying a bribe). The Police reported that it has recently launched a website, stopthebribe.net to enable the public report misconduct by its officials. While this is commendable, FAAN/NCAA still needs to create a dedicated website for the airports so that the centralized committee can effectively coordinate and deal with all reports of misconduct reported on that website.

Where necessary and as much as possible, the outcome of disciplinary action taken should be made public particularly if a staff has been dismissed or terminated on account of dishonourable conduct. This will greatly help to deter. One of the best disinfectants to corruption is publicity. So also is the value of publicizing the conduct of upright officers. Such positive deviants are a source of inspiration to others and a pride to the Service or organisation they come from. The conduct of some officials has been highly commendable. Through their diligence, integrity, and professionalism, several money launderers, drug traffickers had been arrested. The use of staff with exemplary conduct to popularize the 'principle of islands of integrity' needs to be encouraged in the airports through adequate rewards as a means of positive peer pressure.



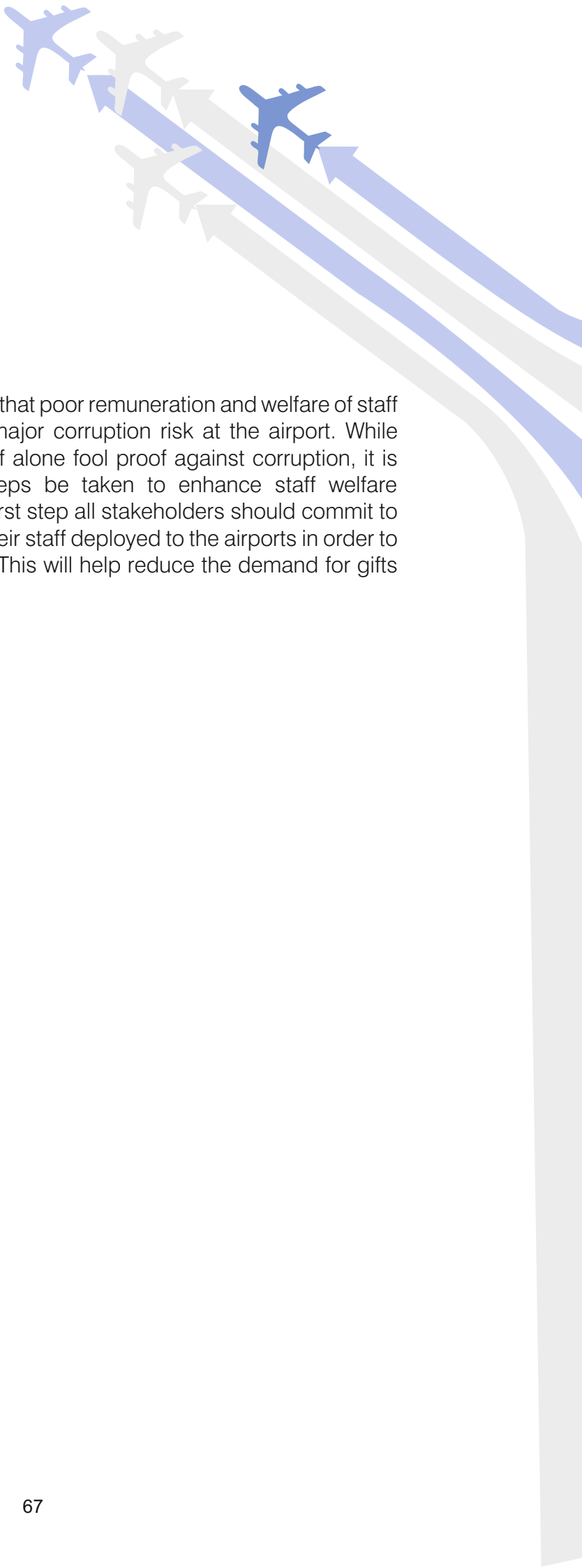
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- 13.7 Having found that there is a general desire by officials of the Services to be posted to the airports for pecuniary reasons, there is need for the development of Guidelines for the minimum requirement for such posting. The discretion presently enjoyed by senior officials in posting has created vulnerability for corruption. There should be no presumption that all personnel are upright and therefore eligible to work at the airports. One of the requirements should be a record of integrity and uprightness by officials to be posted. Secondly, service at the airport should not exceed a maximum of two years and such staff should not be reposted to the airport until at least after a period of 7-10 years. The duration of posting to a particular beat should also be specified. A monthly rotation of staff is recommended.
- 13.8 All officials posted must undergo an intensive induction training programme organised by the central Committee before resumption of duty. This program which should be highly interactive should be dedicated to an understanding of the centralized SOP, Ethics Code and the disciplinary procedure in the event of an infraction. If possible, the Committee should at the end of the programme engage the officials on a one-on-one conversation to gauge their integrity level and the disposition to adhere strictly to the SOP and Ethics Code. Based on an objective assessment, the Committee may recommend that a particular official be returned to his Service and a replacement made.
- 13.9 The high degree of human contact between officials and travellers due largely to the absence of automation of processes and screening equipment is at the heart of the corruption problem at the airport. The installation of the right equipment and good usage will drastically reduce human contact and the opportunities for corruption. The Federal Ministry of Aviation should in this regard allow the necessary independence and autonomy of FAAN/NCAA/AIB declared in the National Policy document and in the legislation setting up the agencies to prevail in order that the funding, processing, acquisition and installation of the equipment will as much as possible be accomplished to avoid the bureaucratic red tape that presently exists. It is now apparent that the regular budgetary financing of airport equipment and facilities is not sufficient. The National policy empowers the agencies to initiate innovative financing. As revenue generating agencies FAAN, NCAA, NAMA, AIB etc are therefore credit worthy and should engage the private sector for short and long term financing models that will enable them acquire and install critical equipment at the airport that will reduce human contact with officials.



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- 13.10 A Unit of the Committee should be dedicated to manning the CCTV which should be deployed to cover highly vulnerable areas like the car parks, terminal entrance, check-in counters, security screening desks, Immigration desk, Customs bay, cargo terminal and all areas where officials physically engage travellers or agents. This equipment should be embedded with video analytics. The CCTV back-end should be reviewed regularly and officials caught on camera engaging in illegal activity should be promptly apprehended and dealt with in accordance with the disciplinary procedure under the Ethics Code.
- 13.11 The delay caused as a result of two officials manning the Immigration desk to process passengers may be resolved if Immigration is tasked with the responsibility of tracking suspects and handing them over to the SSS under a shared security responsibility. This will shorten the time to clear passengers at the Immigration desks and decongest long passenger queues.
- 13.12 The only reason why the nagging problem of touting continues to exist at the airports is because of the lack of will by stakeholder agencies to tackle it. A small crack multi-agency task team to clean the airports of touts should be constituted to raid the airports of touts. The team members who are to be changed from time to time should work in a sustainable manner and not for a week or two to avoid the return to status quo ante. Proactively preventing touts from accessing the airports will be much more useful than arresting and prosecuting them after they have gained access.
- 13.13 FAAN must devise a means of authentic identification of all staff working at the airports including those of ground handling private companies through a uniform identity scheme with sufficient security features to obviate easy falsification. The National Identity Management Commission (NIMC) can be engaged to help with this. Besides screening and vetting the background of Service staff, it should be extended to those of private companies working at the airports. The issuance and use of ODCs should be revised to allow the Committee make an input on the eligibility of applicants. In the long run, automated access control should be installed in vulnerable areas where an official can only access if his ODC permits access to such areas. An official found in an area where he ought not to be or have access to will be in violation of the SOP and liable to be punished accordingly.



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13.14 This CRA also clearly reveals that poor remuneration and welfare of staff of many of the services is a major corruption risk at the airport. While improved wages is not by itself alone fool proof against corruption, it is recommended that urgent steps be taken to enhance staff welfare conditions at the airport. As a first step all stakeholders should commit to paying special allowances to their staff deployed to the airports in order to augment their normal income. This will help reduce the demand for gifts from travellers.



14.0 CONCLUSION

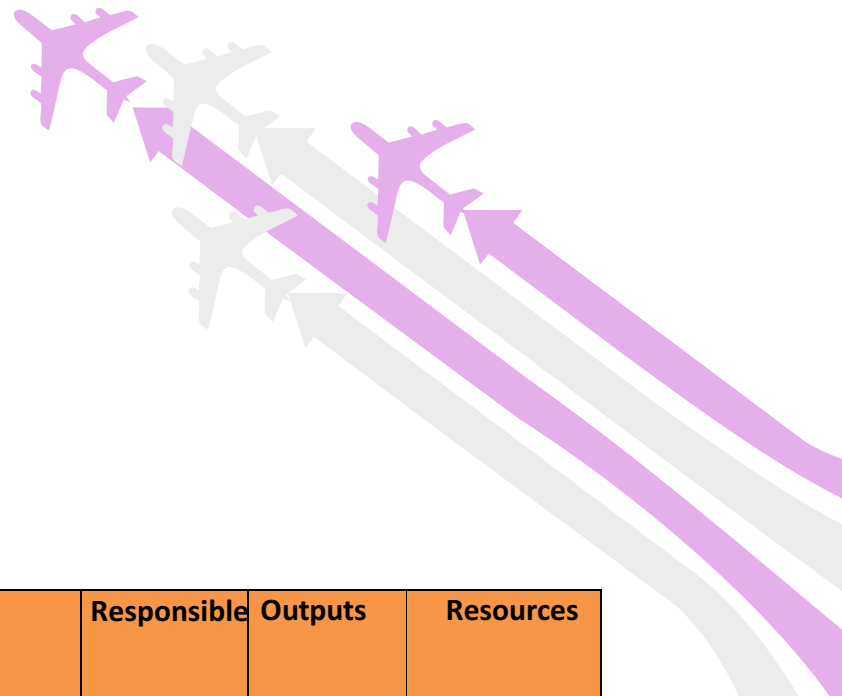
14.1 Corruption negatively impacts airport productivity and in environments that corruption is high, airports become even less productive (Yan and Oum, 2014). Consequently, the findings of this assessment make it incumbent to put in place remedial measures at the airports including: introduction of a central SOP and Code of Conduct for all officials to streamline duties; effectively disseminating information to advise passengers to whom and how to report misconduct by officials; supervising the activities of security officials at the airport to bring them to internationally acceptable standards; training and retraining officials on ethical behavior and thereby increasing their self-worth and patriotism in the discharge of their duties; improving staff welfare and work environment; installing necessary equipment and simplification of the screening procedures in ways that will remove too much human element without reducing the checks intended by security screening and ensuring the installation and functionality of Closed Circuit Television (CCTV) at the airports as well as reviewing the footages from time to time. Robust implementation of these measures will drastically reduce corruption risks in the two airports.

15.0 INTEGRITY PLAN

The Integrity Plan below aims to address the residual risks considered to highly impact the major objectives of the Aviation sector. While it is desirable to implement all the action items in this Plan as quickly as practicable within existing resources; considering the rating of the existing risks and the controls, steps should be taken to prioritize and implement the following action items in the short to medium term: development of a standardized SOP and Code of Ethics; constitution of a Committee to implement both documents; urgent improved funding and equipping the airports with critical equipment to reduce human contact; stamping out touting and effective publication of information to passengers on their rights and obligations and provision of platforms for safe reporting of misconduct by officials. The other items may be addressed on the long term.

Table 6: *Summary of Integrity Plan*

Action Item	Activities	Responsible	Outputs	Resources
Development of a centralized Standard Operating Procedure taking cognizance of the peculiarities of the statutory functions of each agency and as much as possible avoiding inter-agency rivalry.	(a) Call a meeting of stakeholders at the highest level to sensitize on the need for a Centralized SOP	Federal Ministry of Aviation/ stakeholders	A central SOP approved and adopted by all stakeholders at the highest level.	Federal Ministry of Aviation and all its agencies to provide funding. Other stakeholders to assist as appropriate and provide human resources
	(b) Send out Memo calling for inputs from stakeholders	Ditto		
	(c) Constitute a Small	Ditto		



INTEGRITY PLAN

Action Item	Activities	Responsible	Outputs	Resources
	<p>Committee of stakeholders to collate and draft an SOP</p> <p>(d) Circulate draft SOP for comments and clean up</p> <p>(e) Organise a Workshop or retreat for stakeholders at a senior level for validation and adoption</p> <p>(f) Organise training for officials of stakeholders in manageable clusters</p>	<p>Ditto</p> <p>Ditto</p>		

INTEGRITY PLAN

Action Item	Activities	Responsible	Outputs	Resources
Standardized Code of Ethics	(a) Constitute a small Committee of stakeholders to draft a Code of Ethics	Federal Ministry of Aviation /Stakeholders	The production, approval and adoption of a uniform Code of Ethics for guidance of all airports personnel	The Federal Ministry of Aviation to fund with the support of major stakeholders including provision of human resources
	(b) Circulate draft calling for inputs	Ditto		
	(c) Clean up draft and call a meeting of stakeholders for validation and adoption at the highest level	Ditto		
	(d) Organise a retreat for senior officials	Ditto		
	(e) Organise other retreats for staff in manageable clusters	Ditto		

INTEGRITY PLAN

Action Item	Activities	Responsible	Outputs	Resources
Constitution of a Standing Committee made up of stakeholder agencies to supervise the implementation of the SOP and Code of Ethics	<p>(a) Call for nomination of senior representative from agencies and vet them for suitability</p> <p>(b) Inaugurate the Committee</p> <p>(c) Continually organise training staff and other staff of contractors including induction courses</p> <p>(d) Vet staff of contractors</p>	<p>Federal Ministry of Aviation/Stakeholders</p> <p>Ditto/ICPC</p>	<p>-Committee in place and begins to see to the implementation of the SOP and Code of Ethics including receiving complaints and attending to cases reported against personnel.</p> <p>-A strengthened and streamlined work environment with an improved ethical culture</p>	Federal Ministry of Aviation/stakeholder

INTEGRITY PLAN

Action Item	Activities	Responsible	Outputs	Resources
Constitute a Committee for the development of Posting Guidelines	<p>(a) Committee prepare a draft Guidelines</p> <p>(b) Circulate among stakeholders for comments</p> <p>(c) Meeting of stakeholders at the highest level called for approval and adoption</p>	Federal Ministry of Aviation and all stakeholders	<p>-Reduction in the discretion of posting officials by agencies</p> <p>-Reduction of lobbying by officials to be posted to the airport</p> <p>-Improved integrity of officials posted to the airport</p> <p>-Reduction in cases of misconduct by officials</p>	All stakeholders to provide human resources
Initiate innovative financing models for the acquisition and installation of critical equipment to be repaid from revenue generated	(a) Approach financing institutions (local & International) and discuss favourable financing models for the purchase of equipment	Federal Ministry of Aviation FAAN, NCAA, NAMA, AIB	Improved and efficient passenger and cargo processing, reduction of human contact between officials and the travelling community and	Joint initiative between the Ministry, the agencies and private sector financing bodies, local and international

INTEGRITY PLAN

Action Item	Activities	Responsible	Outputs	Resources
	<p>(b) Seek necessary approvals, purchase and install equipment</p> <p>(c) Train staff to competently man the equipment</p>		improved work environment	
Constitute a Special Task Team to stem touting	<p>(a) Multi-agency Task Team constituted, given Guidelines and begins work</p> <p>(b) Task Team submits weekly /Monthly reports to the Central Committee for review of progress</p>	All Stakeholders	<p>-Touting reduced</p> <p>-Notorious touts processed for prosecution</p> <p>-Conducive and crime free airport environment</p>	All Stakeholders

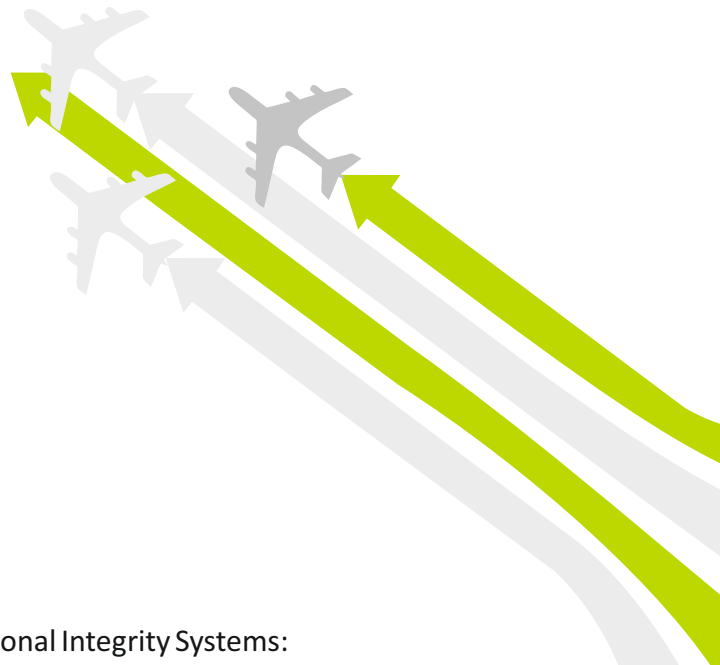
INTEGRITY PLAN

Action Item	Activities	Responsible	Outputs	Resources
Initiate a robust publicity program for the dissemination of information on passenger rights and obligations and a platform for safe reporting of cases of misconduct by officials	<p>(a) Partner with airlines for the circulation of information pamphlets</p> <p>(b) Create a dedicated website for safe reporting of cases including anonymous complaints</p> <p>(c) Partner with credible Aviation NGOs to carry out advocacy</p>	FAAN, NCAA and all stakeholders	<p>-A better informed public on the rights and obligations of travellers</p> <p>-Safe reporting of cases and removal of fear of reprisals against complainant</p>	Regular budget of FAAN, NCAA, stakeholders and possible assistance by airlines

INTEGRITY PLAN

Action Item	Activities	Responsible	Outputs	Resources
Review issuance of ODCs to deserving officials	(a) Partner with NIMC or other government agency to enhance security features in ODCs	Federal Ministry of Aviation and Stakeholders	Improved vetting and scrutiny before issuance of ODCs and better security features	Ministry and agencies' budgets and stakeholders
Streamline security functions between FAAN and AVSEC	Initiate steps for necessary legislative amendments	FMA/FAAN/NC AA	-Clarity of functions between FAAN and NCAA -One agency assumes overall supervision of security issues	Regular budget of FMA/FAAN/NCAA
Take steps to introduce legislative amendments to give full autonomy to AIB	Initiate a dialogue between concerned authorities for the introduction of legislative amendments consistent with best international practice	FMA, AIB, FAAN, NCAA and the NASS	Legislative amendment enabling the AIB reports to be published without passing them through the Minister	

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APPENDIX



PROJECT ADVISORY COMMITTEE AND ASSESSMENT TEAM

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