



# STRATEGIC ACTION PLAN

2024-2028

Independent Corrupt Practices and Other  
Related Offences Commission (ICPC)



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AND OTHER RELATED OFFENCES  
COMMISSION (ICPC)

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## GLOSSARY

Acronyms	Descriptions
ACs	Anti-Corruption Clubs
ACAs	Anti-Corruption Agencies
ACTU	Anti-Corruption and Transparency Monitoring Unit
AV	Anti-Corruption Vanguard
BMOs	Business Management Organizations
BPP	Bureau of Public Procurement
CCB	Code of Conduct Bureau
CPI	Corruption Perception Index
CRA	Corruption Risk Assessment/Assessor
CSO	Civil Society Organization
DFID	United Kingdom Department for International Development
EFCC	Economic and Financial Crimes Commission
FOI	Freedom of Information
FRA	Fiscal Responsibility Act
IATT	Inter-Agency Task Team
J4A	Justice for All
KPI	Key Performance Indicator
LGII	Local Government Integrity Initiative
MDAs	Ministries Departments and Agencies
NACC	National Anti-Corruption Coalition
NACS	National Anti-Corruption Strategy
NASS	National Assembly
NAVC	National Anti-Corruption Volunteer Corp
NBS	National Bureau of Statistics
NEITI	Nigeria Extractive Industry Transparency Initiative
NERDC	Nigerian Educational Research and Development Council
NFIU	Nigerian Financial Intelligence Unit
PAs	Professional Associations
SAV	Students' Anti-corruption Vanguard
SCUML	Special Control Unit against Money Laundering

TBD	To Be Decided
TI	Transparency International
TUGAR	Technical Unit on Governance and Anti-Corruption Reforms
UNDP	United Nations Development Programme
UNODC	United Nations Office on Drugs and Crimes

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## ACKNOWLEDGEMENT

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The Independent Corrupt Practices and Other Related Offences Commission (ICPC) sincerely acknowledges the effort of the Board of the Commission for the development of the 2024 – 2028 Strategic Plan. The robust contributions of the Board during the Workshop helped in shaping the work to the required standard.

Our profound gratitude goes to the Hon. Chairman for his encouragement, guidance and push to get the job done. His admonition and direction kept us on course. Our special gratitude goes to the Secretary to the Commission for providing the needed administrative platform for driving the process to a logical conclusion.

We are grateful to all Directors and Management staff of the Commission for their support all through the journey. Of special mention are the Chief of Staff to the Hon. Chairman and the Special Assistant to the Hon. Chairman on Communication, both of who made invaluable contributions. We also appreciate the efforts of all principal staff to the Hon. Chairman and Secretary for their individual contributions to the success of this Strategic Action Plan.

Of particular mention is the collaborative role played by our development partners during

the planning process, especially the Rule of Law and Anti-Corruption (RoLAC) Programme of the British Council. The Commission also acknowledges the efforts of other stakeholders including civil societies for their roles in supporting the Commission in the fight against corruption.

We wish to specially acknowledge the efforts of all members of the Strategic Plan Development Committee and the various Sub-Committees that worked on various aspects of the Plan. We appreciate all the painstaking contributions in making this work a success.

We equally appreciate the contributions of all staff of the Planning, Research and Statistics (PRS) Department for working tirelessly in collating the various opinions and suggestions and writing the final plan.

Finally, we thank each and every staff of the Commission. You have all contributed directly or indirectly in bringing this endeavour to fruition. May we have the capacity, resources and determination to actualize all our desires as expressed in this plan.

## FOREWORD



It is with great pleasure and a deep sense of responsibility that I present the Independent Corrupt Practices and Other Related Offences Commission's (ICPC) Strategic Plan for 2024-2028. This comprehensive plan marks a significant milestone in our ongoing fight against corruption and our unwavering commitment to fostering integrity and good governance across Nigeria. Importantly, this plan is intrinsically aligned with the priorities and objectives laid out in The National Anti-Corruption Strategy (2022 – 2026) Action Plan 2024, as well as other relevant anti-corruption implementation frameworks.

Building upon the successes and lessons learned from our previous strategic plan (2019-2023), this new plan has been meticulously crafted through a collaborative and reflective process. We have rigorously assessed our past performance, identified areas for improvement, and incorporated

key learnings to ensure a more impactful and sustainable approach to combating corruption.

The ICPC Strategic Plan for 2024-2028 embodies our renewed dedication to achieving a corruption-free Nigeria. It encompasses a comprehensive results framework, integrated undelivered activities from the previous plan, and strategic activities aligned with both national and sub-national anti-corruption strategies. The development of a robust Monitoring and Evaluation (M&E) operational framework will further enhance our ability to track progress, ensure accountability, and make data-driven adjustments as needed.

My personal policy thrust is clear: prioritize corruption prevention while maintaining a strong enforcement focus. By leading with integrity, innovation, and the strategic use of technology, we will strive for greater efficiency, effectiveness, and transparency in our operations and in the broader fight against corruption.

It is with great pride that I present this 2024-2028 Strategic Plan. I urge all stakeholders – government agencies, civil society organizations, the private sector, and the Nigerian people – to join us in its effective implementation. Together, let us create a Nigeria where integrity and accountability prevail, for the greater good of our beloved nation.

*Dr. Musa Aliyu Adamu SAN*

ICPC Chairman,  
May 2024





## 1. BACKGROUND

In our ongoing commitment to combating corruption in Nigeria, the Independent Corrupt Practices and Other Related Offences Commission (ICPC) recognizes the critical importance of strategic planning. Our initial 2004-2008 Strategic Plan, while a significant step, faced challenges in implementation due to a disconnect between formulation and execution. These lessons learned informed our 2013-2017 Strategic Plan, developed in collaboration with the Department for International Development's Justice for All (J4A) program. This plan, coupled with a robust Monitoring and Evaluation (M&E) Framework, saw considerable success, as affirmed by a 2017 performance review attended by stakeholders including DFID.

Determined to build upon this progress, in November 2018, we partnered with the British Council's Rule of Law and Anti-Corruption (RoLAC) Programme for a three-day workshop on organizational strategy development. This workshop facilitated a thorough review of lessons learned from past strategy implementation, paving the way for a new strategic plan that aligns with the objectives of the National Anti-Corruption Strategy (NACS) 2017-2021. It also underscored the need for a Change Management Committee to guide implementation and ensure our strategic goals remain relevant and actionable.

We are confident that this meticulous and collaborative approach to strategic planning will not only enhance the effectiveness of our anti-corruption efforts but also foster a culture of continuous improvement within the ICPC. We remain steadfast in our commitment to transparency, accountability, and good governance, and we invite all stakeholders to join us in this vital endeavour.



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



### 2.1 ESTABLISHMENT

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

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

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



### 2.2 LEGISLATION

The Act is made up of 71 Sections:

**01**

**Section 1:**

Cites the Act

**02**

**Section 2:**

Interpretation of the Act

**03**

**Sections 3-7:**

Establish the Commission and provide for the appointment and powers of its officers. In particular, Section 6 spells out the mandate of the Commission which is not only penal but also preventive and advisory

**04**

**Sections 8-26:**

Offences and penalties

**05**

**Sections 27-42:**

Powers of investigation, search, seizure and arrest

**06**

**Sections 43-52:**

provisions relating to powers of the Chairman of the Commission and asset recovery among others

**07**

**Sections 53-60:**

Relate to evidence

**08**

**Sections 61-71:**

Prosecution and trial of offences

**09**

**Sections 65-71:**

General provisions

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

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

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



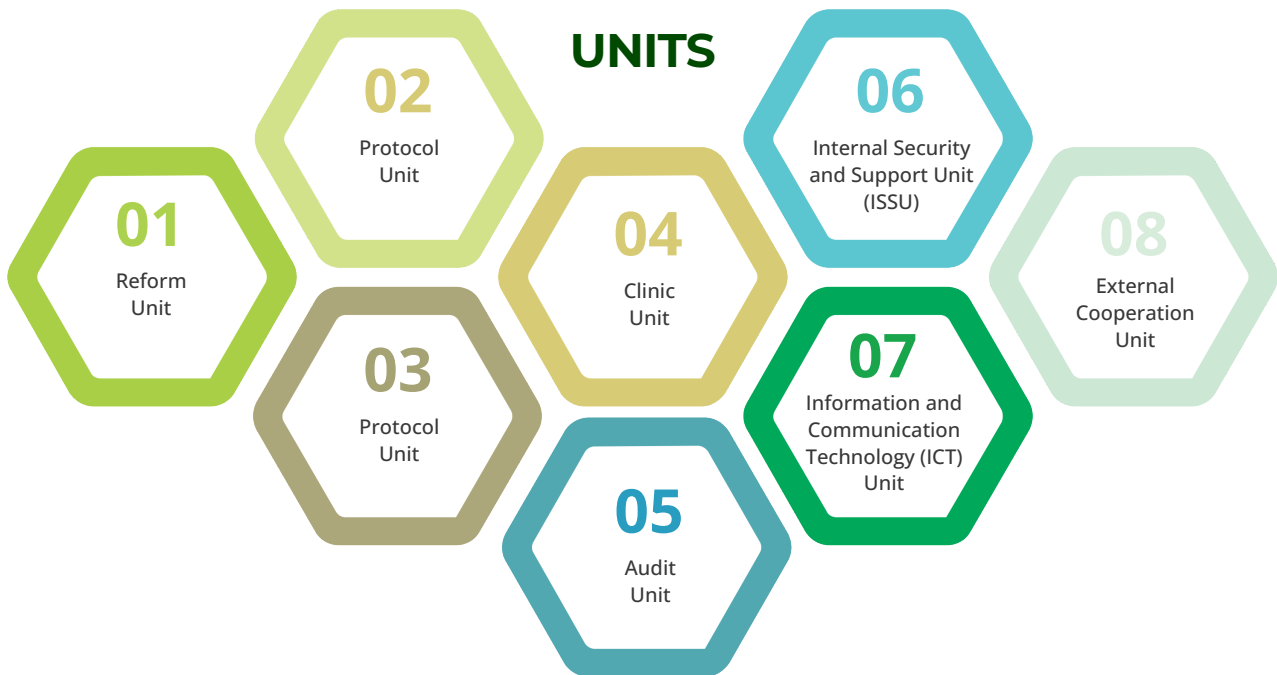
## 2.3 INDEPENDENCE OF THE COMMISSION

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



## STRUCTURE OF THE COMMISSION

The Act stipulates that the Board of the Commission shall comprise a Chairman and twelve members, two from each of Nigeria's six geopolitical zones. Appointments are made by the President, subject to Senate confirmation, with emphasis on integrity. Before assuming office, appointees must declare their assets and liabilities as per constitutional requirements. A Secretary, appointed by the President, assists the Chairman, overseeing record-keeping and staff administration. The current Chairman and Secretary to the Commission were appointed by President Bola Ahmed Tinubu on the 17th October, 2023. The Chairman holds significant powers, including issuing Standing Orders for operational efficiency, as per Section 7(1) of the Act.





## ICPC ACADEMY

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



## LOCATIONS

The Headquarters of the ICPC is situated in Abuja, the Federal Capital Territory (FCT). The Act empowers the ICPC to establish one or more offices in each state of the federation and the Federal Capital Territory. Presently, the ICPC has offices in twenty-one (21) states of the federation while the total staff strength is one thousand one hundred and eighty-five (1185).



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



#### 3.1 ANTI-CORRUPTION INSTITUTIONAL FRAMEWORK

Before the enactment of the Corrupt Practices and Other Related Offences Act, 2000, Nigeria already had statutory anti-corruption institutional frameworks. The 1999 Constitution, as amended, established the Code of Conduct Bureau and Code of Conduct Tribunal. The former receives complaints and conducts investigations, referring cases of public officer violations to the latter for adjudication.

Subsequent anti-corruption frameworks were Acts of Parliament aimed at strengthening Nigeria's anti-corruption efforts:

- The Corrupt Practices and Other Related Offences Act, 2000, established the Independent Corrupt Practices and Other Related Offences Commission (ICPC) to enforce, prevent, and garner public support against corruption.
- The Economic and Financial Crimes Act, 2002, established the Economic and Financial Crimes Commission (EFCC) to enforce laws on economic and financial crimes.
- The Bureau of Public Procurement Act, 2007, established the Bureau of Public Procurement (BPP) to regulate procurement in Nigeria.
- The Nigeria Extractive Industry Transparency Initiative (NEITI) Act, 2007, established NEITI to ensure transparency in payments made by extractive industries to the federal government.
- The Money Laundering Act, 2012 (amended), addressed money laundering and associated predicate offences.

Additionally, the Nigeria Financial Intelligence Unit (NFIU) became autonomous through the NFIU Act, 2018, housed within the Central Bank of Nigeria. It aims to enhance financial intelligence management and combat money laundering and associated crimes. The Special Control Unit against Money Laundering (SCUML) was also established to combat money laundering and terrorist financing.

Administrative units like the Budget Office of the Federation, Technical Unit on Governance and Anticorruption Reforms (TUGAR), Inter-Agency Task Team (IATT), and Presidential Advisory Committee Against Corruption (PACAC) coordinate, monitor, and evaluate anti-corruption and governance initiatives. With the National Anti-Corruption Strategy (NACS) adoption, the Federal Ministry of Justice, led by the Attorney-General of the Federation (AGF), oversees the NACS implementation at the federal level, while State Attorney-General's monitor implementation at state and local government levels.





## 4. FRAMEWORK OF THE ICPC STRATEGY

### 4.1 UNDERLYING REASONS FOR THE STRATEGY

A Strategic Plan is a fundamental roadmap for any organization, providing a structured approach to navigate future challenges and achieve desired objectives. The ICPC Strategic Plan serves this crucial purpose, guiding the Commission towards its goals through a well-defined strategy. It acts as a compass, outlining the Commission's mission, collective commitments, and timelines for achieving set targets.

The plan is designed to be a comprehensive tool, enabling the ICPC to assess its current state, define priorities, outline the path to success, allocate resources effectively, and rigorously monitor progress towards goal attainment. This meticulous approach ensures that the Commission remains focused on its strategic objectives, maximizing its impact in the fight against corruption.



### 4.2 SCOPE OF THE STRATEGY

As the immediate precursor, the Strategy is a five-year medium-term plan aimed at elevating the Commission into a proficient anti-corruption entity. Its scope encompasses reviewing the ICPC and its internal capacity, operational procedures, strategy execution for enhanced performance and goal attainment, delivery of National and Sub-National Strategies objectives, and overall progress of the ICPC across its operations.

### 4.3 THE PROCESS OF DEVELOPING THE STRATEGY

The ICPC Strategic Plan 2024-2028 was developed through a rigorous process that commenced with a comprehensive assessment of the 2019-2023 plan's performance. This evaluation identified key successes, challenges, and areas for improvement, informing the strategic direction for the new plan.

In collaboration with RoLAC, a two-day retreat was held to validate the new strategy. The retreat encompassed a thorough review of the previous plan, establishing a clear vision, mission, and strategic objectives. A robust results framework was developed, strategic activities were identified and aligned with national and sub-national strategies, and an M&E operational framework was established to ensure effective implementation.

The four Technical Sub-Committee reports on the 2024-2028 strategy were presented and subsequently integrated into a comprehensive document by the Planning, Research, and Statistics Department.



## 5. STRATEGIC REVIEW OF THE ICPC

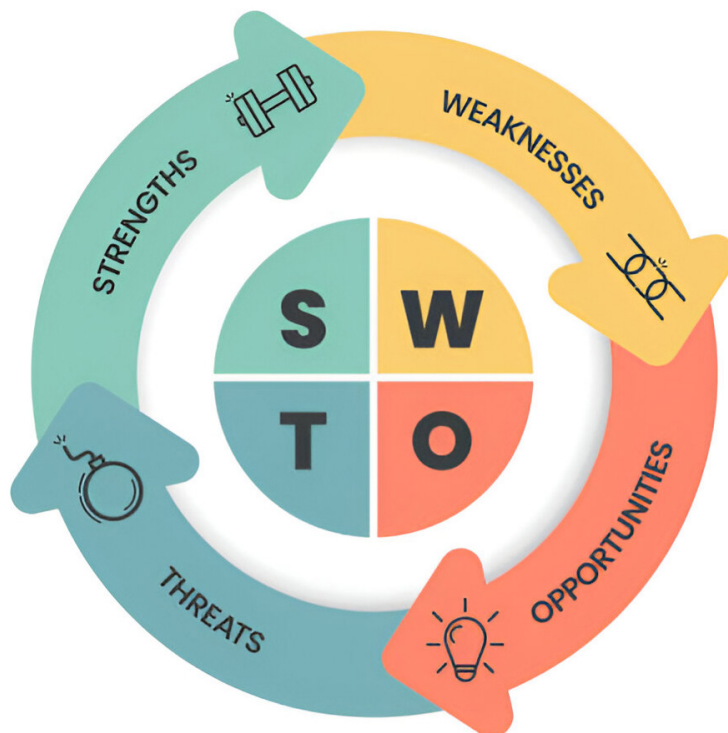
### 5.1 EXTERNAL ENVIRONMENT

The ICPC operates within a dynamic external environment characterized by evolving global socio-economic and political landscapes, technological advancements, and the escalating threat of transnational crimes. These factors necessitate an adaptive and responsive approach to fulfilling the Commission's mandate. Corruption, a global scourge, impedes national development and fuels social unrest. Its intricate links to money laundering and terrorism financing pose significant security risks. In Nigeria, the ICPC is entrusted with the pivotal role of combating this menace through a three-pronged strategy: enforcement, prevention, and public education.

The ICPC has demonstrated notable successes in these areas. Enforcement actions have yielded significant results, while preventive measures such as Systems Study and Review and Corruption Risk Assessments (CRAs) have bolstered the integrity of public institutions. The Commission's leadership in capacity-building initiatives, such as training for African Union anti-corruption agencies, further underscores its commitment to combating corruption on a broader scale.

Public education and mobilization efforts have raised awareness and fostered public participation in anti-corruption initiatives. However, the fight against corruption remains an ongoing challenge. The ICPC continuously analyzes its strengths, weaknesses, opportunities, and threats to strategically address emerging issues and adapt to the ever-changing external environment.

### 5.2 SUMMARY OF STRENGTHS, WEAKNESSES, OPPORTUNITIES AND THREATS (SWOT)





## EXTERNAL OPPORTUNITIES

**Enhanced Communication:** Leveraging the NEIP, CEPTI, and other initiatives for strategic communication outreach.

**Expanded Partnerships:** Strengthening collaboration with NAVC, NACC, professional bodies, private sector entities, and other relevant stakeholders.

**Strategic Alliances:** Fostering partnerships with international agencies and development partners like UNODC, RoLAC, MacArthur Foundation, and UND

**Inter-Agency Cooperation:** Collaborating with other anti-corruption agencies (ACAs) and relevant bodies (BPP, NFIU, FIRS, etc.) for effective corruption combat.

**Legal Framework Utilization:** Leveraging existing laws and regulations (ACJA, POCA, MLPPA, FOI Act, etc.) to strengthen anti-corruption efforts.

**Capacity Building:** Partnering with donor agencies and institutions to enhance staff competencies through training and retraining programs.

**Technology Integration:** Utilizing technology for efficient case tracking, legal advisory, data analysis, and overall operational optimization.

**Public Engagement:** Collaborating with OSGF and OAGF to showcase the Commission's achievements through events like the National Summit on Diminishing Corruption.

**Data-Driven Insights:** Utilizing research data and insights from sources like the NBS/UNODC corruption survey and Governance Index to inform policy development and implementation.

## INTERNAL STRENGTHS

**Robust Legal Framework:** The comprehensive ICPC Act 2000 aligns with UNCAC requirements, providing a strong foundation for enforcement, prevention, and public engagement activities.

**Enforcement Capabilities:** The Commission possesses special investigative and prosecutorial powers to effectively combat corruption.

**Preventive Measures:** Authority to conduct Systems Study and Review and Corruption Risk Assessments in MDAs strengthens preventive efforts.

**Public Engagement:** Robust public enlightenment and education programs utilize various channels to raise awareness and mobilize against corruption.

**Operational Independence:** The Commission maintains autonomy and is not subject to external political interference.

**National Reach:** Presence in 21 states and the FCT ensures nationwide coverage and impact.

**Experienced Workforce:** The Commission benefits from a pool of competent, experienced, and high-quality staff.

**Optimized Structure:** A streamlined organizational structure promotes efficiency and career development opportunities.

**Training and Development:** The ICPC Academy provides continuous training and retraining opportunities for staff.

**Knowledge Generation:** The Academy's research output informs the development of knowledge-based anti-corruption policies.

**Strong Reputation:** The ICPC is recognized as a leading anti-corruption agency, offering training and expertise to public officials and the general public

THREATS	WEAKNESSES
<p><b>Political Interference:</b> Potential for political pressure in cases involving Politically Exposed Persons (PEPs).</p>	<p><b>Personnel Shortage:</b> Inadequate staffing levels at headquarters and state offices.</p>
<p><b>Funding Constraints:</b> Insufficient funding hindering the Commission's mandate implementation</p>	<p><b>Inadequate Facilities:</b> Insufficient office space for staff.</p>
<p><b>Legislative Delays:</b> Delays in amending the ICPC Act to address emerging challenges.</p>	<p><b>Training Deficiencies:</b> Insufficient training and retraining opportunities, particularly in specialized areas.</p>
<p><b>Socio-Cultural Barriers:</b> Prevailing social values that tolerate or encourage corrupt practices.</p>	<p><b>Operational Focus:</b> Limited commitment to investigating non-petition intelligence-led cases.</p>
<p><b>Legal Challenges:</b> Disputes regarding the ICPC Act's jurisdiction and the Attorney-General's nolle prosequi powers.</p>	<p><b>Centralization:</b> Overly centralized operational structure, hindering state office autonomy and creating cumbersome reporting lines.</p>
<p><b>Judicial Inefficiencies:</b> Slow judicial processes hindering timely resolution of cases.</p>	<p><b>Recruitment and Conduct Standards:</b> Absence of standardized recruitment processes and a comprehensive code of conduct for staff.</p>
<p><b>Organizational Threats:</b> Potential for mergers, scrapings, or inter-agency rivalry that could undermine the Commission's mandate.</p>	<p><b>Information Management:</b> Weak information management system and lack of a centralized data bank for Commission statistics.</p>
<p><b>Security Risks:</b> Threats to personnel safety and the integrity of ICT infrastructure.</p>	<p><b>Internal Controls:</b> Inadequate internal checks to ensure staff integrity and accountability.</p>
<p><b>Resource Limitations:</b> Lack of funding for Anti-Corruption and Transparency Units (ACTUs) and absence of dedicated budget lines for MDAs' ACTUs.</p>	<p><b>Resource Constraints:</b> Insufficient office equipment, tools, and resources for optimal performance.</p>
<p><b>Jurisdictional Conflicts:</b> Increasing challenges from state governments regarding the authority of federal ACAs to investigate them.</p>	<p><b>Petition Processing:</b> Lack of defined timelines for handling and processing petitions.</p>
	<p><b>Low Morale:</b> Low staff morale due to inadequate compensation, benefits, and career development opportunities.</p>
	<p><b>Bureaucracy:</b> Excessive bureaucratic processes hindering operational efficiency and agility.</p>
	<p><b>Law Enforcement Culture:</b> Weak law enforcement culture and limited visibility of the Commission's achievements.</p>



## 5.3 STAKEHOLDERS ANALYSIS

### Key Stakeholders:

#### Internal:

- ICPC Staff

#### Governmental:

- Civil Society Organizations (CSOs)
- National Assembly (NASS)
- Other Anti-Corruption Agencies (ACAs)
- Bureau of Public Procurement (BPP)
- Judiciary
- Ministry of Justice
- Ministry of Finance
- Budget Office
- Office of the Auditor-General for the Federation (OAuGF)
- National Bureau of Statistics (NBS)

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



**NOTE:**

**Quadrant 1** (Low Influence/Low Interest): These stakeholders are kept informed of the Commission's activities but require minimal engagement due to their limited influence and interest.

**Quadrant 2** (High Influence/Low Interest): These stakeholders are crucial to the Commission's success as they possess significant influence and can address the Commission's concerns. Active engagement is necessary to maintain their support.

**Quadrant 3** (Low Influence/High Interest): These stakeholders demonstrate a keen interest in the Commission's work but have limited ability to influence its outcomes. Their engagement should be focused on providing information and updates.

**Quadrant 4** (High Influence/High Interest): These are the Commission's most critical stakeholders, possessing both high influence and high interest. Their active involvement and support are essential for the Commission's overall success..

## 5.4 THE CHALLENGES

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

### 5.4.1 Key Internal Challenges

**State Office Alignment:** Lack of coherent integration of state office activities with the strategic plan's performance evaluation and target setting.

**Staffing Gaps:** Shortage of specialized professionals (psychologists, accountants, lawyers, etc.) to effectively execute the Commission's diverse functions.

**State Office Capacity:** Insufficient staffing, funding, and equipment at the 21 existing state offices hinder operational effectiveness.

**Integrity Assurance:** Inadequate mechanisms for monitoring and ensuring the integrity of staff conduct.

**Information Flow:** Inefficient internal communication and information sharing impede timely decision-making and collaboration.

**Data Management:** Absence of a central data bank or online portal for data submission leads to delays and incomplete reporting.



### 5.4.2 External Challenges

<p><b>Political Interference:</b> External pressure in cases involving high-profile individuals can hinder investigations and prosecutions.</p>	<p><b>Financial Constraints:</b> Inadequate funding limits the Commission's capacity to conduct comprehensive investigations, prosecutions, preventive measures, and public awareness campaigns.</p>	<p><b>Technological Vulnerability:</b> Threats to ICT infrastructure pose risks to data security and operational efficiency.</p>
<p><b>Legislative Limitations:</b> Delays in amending the ICPC Act and existing deficiencies hinder the Commission's ability to adapt to evolving challenges.</p>	<p><b>Judicial Delays:</b> Slow judicial processes impede the timely resolution of corruption cases, potentially undermining deterrence efforts.</p>	<p><b>Personnel Security:</b> Inadequate security measures for staff engaged in sensitive investigations pose risks to their safety.</p>
<p><b>Socio-Cultural Factors:</b> Societal tolerance for corruption and public apathy present significant obstacles to anti-corruption efforts.</p>	<p><b>ACTU Effectiveness:</b> Limited funding and operational independence hinder the effectiveness of Anti-Corruption and Transparency Units (ACTUs) within MDAs.</p>	<p><b>Internal Conflicts of Interest:</b> The loyalty of MDA staff responsible for ACTUs may be compromised when dealing with internal corruption issues.</p>



### 5.4.3 Strategies to address the identified challenges

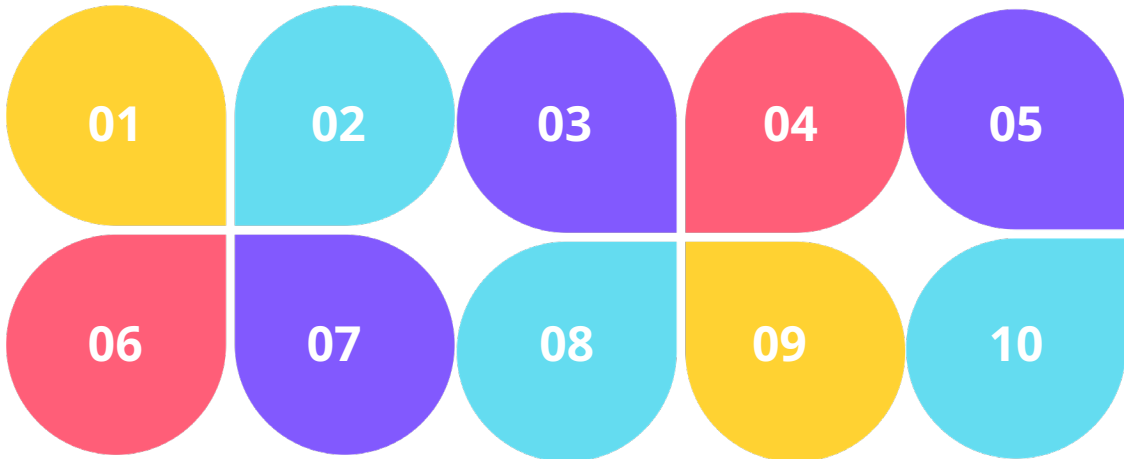
**Judicial Collaboration:** Engage in collaborative sessions with the Judiciary through the National Judicial Council and National Judicial Institute.

**Public Education and Awareness:** Conduct sensitization sessions utilizing the National Ethics and Integrity Policy (NEIP), National Values Curriculum (NVC), Ethics and Integrity Compliance Scorecard (EICS), and other relevant initiatives.

**Technology Upgrade:** Update ICT infrastructure and provide staff training to adapt to technological advancements.

**Data Management:** Develop an online data portal or upgrade the existing Electronic Document Management System (EDMS) for streamlined data collection and reporting.

**Legislative Advocacy:** Advocate for amendments to the ICPC Act to enhance its effectiveness.



**Integrity Assurance:** Implement mechanisms for periodic integrity checks and tests for Commission staff.

**Efficient Case Management:** Establish clear timelines for petition processing and increase the investigation of non-petition intelligence-led cases.

**Staff Welfare:** Develop and implement comprehensive Conditions of Service and enhance retirement benefits to improve staff morale.

**Strategic Communication:** Employ and deploy skilled communicators across multiple channels to enhance public engagement.

**Communication Enhancement:** Allocate additional funding for radio and TV jingles, production of informational materials, and expansion of communication channels.





## RISK ASSESSMENT

Assumptions and Risk	Impact and Risk Management
<p><b>Assumption:</b> It is assumed that the government will increase funding to enable the ICPC improve its operations.</p> <p><b>Risk:</b> Inadequate funding by the government to provide adequate funding for the ICPC will slow down the Commission's operations and adversely affect its performance.</p>	<p><b>Impact:</b> Incomplete implementation of the strategic plan would impact negatively on the performance of the Commission.</p> <p><b>Risk management:</b> Project execution should be flexible, innovative and cost-effective. Leveraging on low-hanging fruits that will impact on Commission's performance and taking advantage of donor partners to champion some key activities.</p>
<p><b>Assumption:</b> Collaboration with the Judiciary will help in addressing the challenges in delay of trial cases.</p> <p><b>Risk:</b> Delay in the trial of cases transmits wrong signals to citizens giving the impression that people are not punished for corruption.</p>	<p><b>Impact:</b> Wrong perception of the people about the inability of the Judiciary to try corruption cases.</p> <p><b>Risk management:</b> Ensure close collaboration with the Judiciary through the Nigerian Bar Association, National Judicial Council, National Judicial Institute, etc.</p>
<p><b>Assumption:</b> There will be less political interference especially in cases involving politically exposed persons (PEPs) and government will adopt zero tolerance stance in the fight against corruption and observe the rule of law.</p> <p><b>Risk:</b> Despite independence of the Commission, there might be attempts to interfere with the mandate by politically exposed persons (PEPs).</p>	<p><b>Impact:</b> Selective enforcement of the anti-corruption laws may make the people see the anti-corruption campaign as a charade.</p> <p><b>Risk management:</b> Ensure enforcement of the ICPC mandate and observance of the rule of law.</p>
<p><b>Assumption:</b> Operational effectiveness will not be impaired by the existence of a number of ACAs with similar mandates.</p> <p><b>Risk:</b> Continued competition and lack of coordination among ACAs will cause loss of confidence in ICPC by the public and government, leading to disbandment or fundamental reorganisation.</p>	<p><b>Impact:</b> Overlapping of functions will reduce operational effectiveness and public support for ACAs.</p> <p><b>Risk management:</b> ICPC should focus on its mandate and area of competitive advantages and be proactive in inter-agency cooperation.</p>
<p><b>Assumption:</b> The enthronement of ethics in Nigerian society and revival of traditional values will enhance the quest for a corruption-free Nigeria.</p> <p><b>Risk:</b> The continued erosion of ethics and values in the society will make the efforts to fight corruption more difficult.</p>	<p><b>Impact:</b> Distorted value system which glorifies ill-gotten wealth as well as ethnic and religious differences will aid corruption.</p> <p><b>Risk management:</b> The National Ethics and Integrity Policy, Ethics and Integrity Compliance Scorecard, National Values Curriculum and other relevant initiatives should be used to educate and enlighten the public. Stakeholder groups will also be enlisted.</p>

**Assumption:** The deployment of relevant technology will enhance the Commission's performance.

**Risk:** Failure to deploy technology will leave the Commission behind in meeting up with the benefits of technological innovations.

**Impact:** Technology has often been used wrongly to perpetrate corruption but deployment of tech in ICPC will greatly enhance the fight against corruption.

**Risk management:** Need to constantly update ICT infrastructure and build staff capacity to adapt to technological changes.

**Assumption:** The amendment of the Act by the National Assembly will make the Commission more proactive and effective.

**Risk:** Putting the blame on the existing law will only divert the Commission's attention from its duties.

**Impact:** An amended act will empower the Commission to tackle diverse modern and evolving forms of Corruption.

**Risk management:** Advocate for the amendment of the Act.

**Impact:** An amended act will empower the Commission to tackle diverse modern and evolving forms of Corruption.

**Risk management:** Advocate for the amendment of the Act.

**Impact:** Loss of integrity and credibility in the eyes of the stakeholders and the general the public.

**Risk management:** Need to conduct periodic integrity checks and tests on staff of the Commission.

**Assumption:** ICPC will make recoveries of proceeds of crime and restrain funds from being unnecessarily and fraudulently released/spent by the Government.

**Risk:** Resistance to CEPTI and other such activities by Legislators. The Strategic focus of the Commission may not prioritize recoveries and restraints.

**Impact:** Recoveries will enhance the image of the Commission, make funds available to the government and subsequently, to the Commission.

**Risk Management:** Enhance activities towards POC tracking and recovery, CEPT, Systems Studies and Reviews, Corruption Risk Assessments to increase the level of recoveries and restraints made.

**Assumption:** ICPC will enhance its strategic communications activities and channels to improve engagement with the publics at all levels (on social media, at the grassroots, etc) for positive behavioural change, and institutionalizing Integrity.

**Risk:** Inadequate funds and specialized staff with requisite skills to fully deploy strategic communications.

**Impact:** Increase in the Commission's strategic communications activities will enhance the image of the Commission and help bring about the change that the Commission wants to see in the society.

**Risk Management:** Employ and post officers with requisite skills in multiple communications channels to the department. Vote funds for radio & TV jingles, production of skits, informational materials, etc., Increase channels of communications.



## 7. STRATEGIC PRIORITIES & RESULTS FRAMEWORK

### 7.1 THE ICPC APPROACH

Following a comprehensive assessment and evaluation, the Commission has determined that its existing Vision, Mission, and Core Values remain strategically aligned with the optimal execution of its tripartite mandate encompassing Enforcement, Prevention, and Public Education and Mobilization. The decision to retain these foundational elements underscores their enduring relevance and efficacy in guiding the Commission's operational framework and strategic objectives.

### 7.2 ICPC'S VISION, MISSION AND VALUES

The ICPC's vision serves as its guiding principle, encapsulating the Commission's long-term aspirations and short-term objectives. The ICPC is steadfast in its commitment to diligently pursue the realization of this vision.

#### VISION

A Nigeria free from all forms of corruption

#### MISSION

To rid Nigeria of corruption through lawful enforcement and preventive measures



## VALUES:

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



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

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

## 7.3 KEY OBJECTIVES

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

The key objectives derive from the vision and mission statements set out the priorities for the Commission over the next five years. The aim is to strengthen the performance and relevance of the ICPC in tackling corruption in Nigeria. The objectives are further elaborated through identified Outcomes and the Operational Plan that indicate the Outputs and Key Activities (See Annexures 1, 2 and 3 at pages 27, 28 and 40 respectively for details). A summary of the key objective is presented below:

## STRATEGIC OBJECTIVES

1. More Effective Channels and Processing of Petitions, Investigation and Prosecution of Corruption Cases
2. Reduction of System-Induced Corrupt Practices
3. Effective Mobilization of the Citizenry to Fight Corruption
4. Effective Recovery and Management of Proceeds of Corruption & Other Related Offences
5. Increase Managerial Effectiveness and Institutional Strengthening of ICPC



## 9. STRATEGY IMPLEMENTATION

### **CARE for Impact:**

The Commission is embarking on an important journey with the CARE for Impact initiative, a comprehensive strategy designed to revitalize the organization and solidify its position as Nigeria's premier anti-corruption authority. CARE, an acronym for Culture, Accountability, Responsibility, and Efficiency, embodies the core principles that will guide this strategic shift.

### **Culture:**

At the heart of CARE is a cultural transformation. The ICPC is committed to fostering a collective ethos that embodies the fundamental principles outlined in the ICPC Act, emphasizing its identity as a law enforcement agency first and foremost. This will be achieved through comprehensive communication and training programs designed to instil a deep-rooted understanding of the Commission's values and ethical standards. A recognition and reward system will further incentivize behaviours aligned with this desired culture.

### **Accountability:**

The strategy places a strong emphasis on accountability at all levels. The ICPC will reinforce transparency and answerability by implementing a robust performance management system, conducting regular audits and reviews, and establishing a transparent reporting mechanism for identifying and addressing potential misconduct. This unwavering commitment to accountability will ensure that the Commission's actions are open to scrutiny and that its staff are held to the highest standards of integrity.

### **Responsibility:**

Proactive responsibility is a key element of the CARE for Impact approach. The ICPC will enhance its risk assessment and management processes to proactively identify and mitigate potential corruption vulnerabilities. Additionally, educational and awareness programs will be developed to foster a culture of ethical behaviour and encourage staff to take ownership of their responsibilities. By emphasizing proactive measures, the Commission aims to prevent corruption before it occurs and promote a more responsible and ethical society.

### **Efficiency:**

Operational efficiency is the final pillar of the CARE for Impact strategy. The Commission is committed to streamlining its internal processes and procedures, eliminating redundancies, and optimizing resource utilization. This will be achieved through investments in modern technology and digital tools, ongoing training and development opportunities for staff, and a focus on continuous improvement. By enhancing operational efficiency, the Commission will ensure a swift and effective response to corruption challenges.

The CARE for Impact initiative represents a thoughtful vision for the future of the ICPC. By addressing the challenges of chronic underfunding, skills and capacity deficits, and poor infrastructure, the Commission is paving the way for a more effective, efficient, and ethical organization. Through this strategy, the ICPC will strengthen its reputation, increase public trust, and ultimately achieve its strategic objectives in the ongoing battle against corruption in Nigeria.

## 10. MONITORING & EVALUATION (M&E) FRAMEWORK FOR STRATEGIC PLAN IMPLEMENTATION

### Purpose:

The M&E framework is essential for ensuring successful implementation of the ICPC's strategic plan. It provides tools and processes to measure progress against planned objectives and outcomes, enabling data-driven decision-making and course correction as needed.

### Components:

#### 1. Results Framework:

- Defines key performance indicators (KPIs) for assessing plan progress.
- Depicts causal linkages between mission, objectives, and expected impact.

#### 2. Performance Monitoring Matrix (PMM):

- Part 1 (Summary): Identifies responsible departments/units and aggregate targets for each KPI over the five-year plan period.
- Part 2 (Detail): Defines specific indicators, units of measurement, data sources, and targets for each level of expected results.

#### 3. M&E Operational Plan:

- Links planned objectives, outcomes, outputs, and key activities.
- Identifies responsible functional units for achieving results.

### Reporting and Review:

- Periodic reporting (quarterly, half-yearly, annually) on plan activities.
- Continuous review to ensure strategies remain relevant.
- Quarterly meetings with progress reports conveyed via a dashboard.
- Exceptional reporting to the Chairman/Board when necessary.

### ICPC Results Logic: A Framework for Achieving Anti-Corruption Goals

The Independent Corrupt Practices and Other Related Offences Commission (ICPC) remains steadfast in its mission to eradicate corruption in Nigeria through lawful enforcement and preventive measures. To achieve this overarching goal, the Commission has defined five strategic objectives, each with corresponding outcomes that will drive its efforts.



**Enhanced Case Management and Prosecution:** By establishing more effective channels for processing petitions, streamlining case management, and improving investigation and prosecution capabilities, the ICPC aims to expedite the resolution of corruption cases and increase the rate of successful prosecutions. This will deter potential offenders and contribute to a more just and accountable society.

**Systemic Corruption Prevention:** The ICPC recognizes that corruption is not merely an individual act but often a systemic issue. By strengthening mechanisms for corruption prevention, such as conducting thorough system studies and risk assessments, the Commission can identify and address vulnerabilities in public institutions, ultimately reducing the opportunities for corruption to occur.

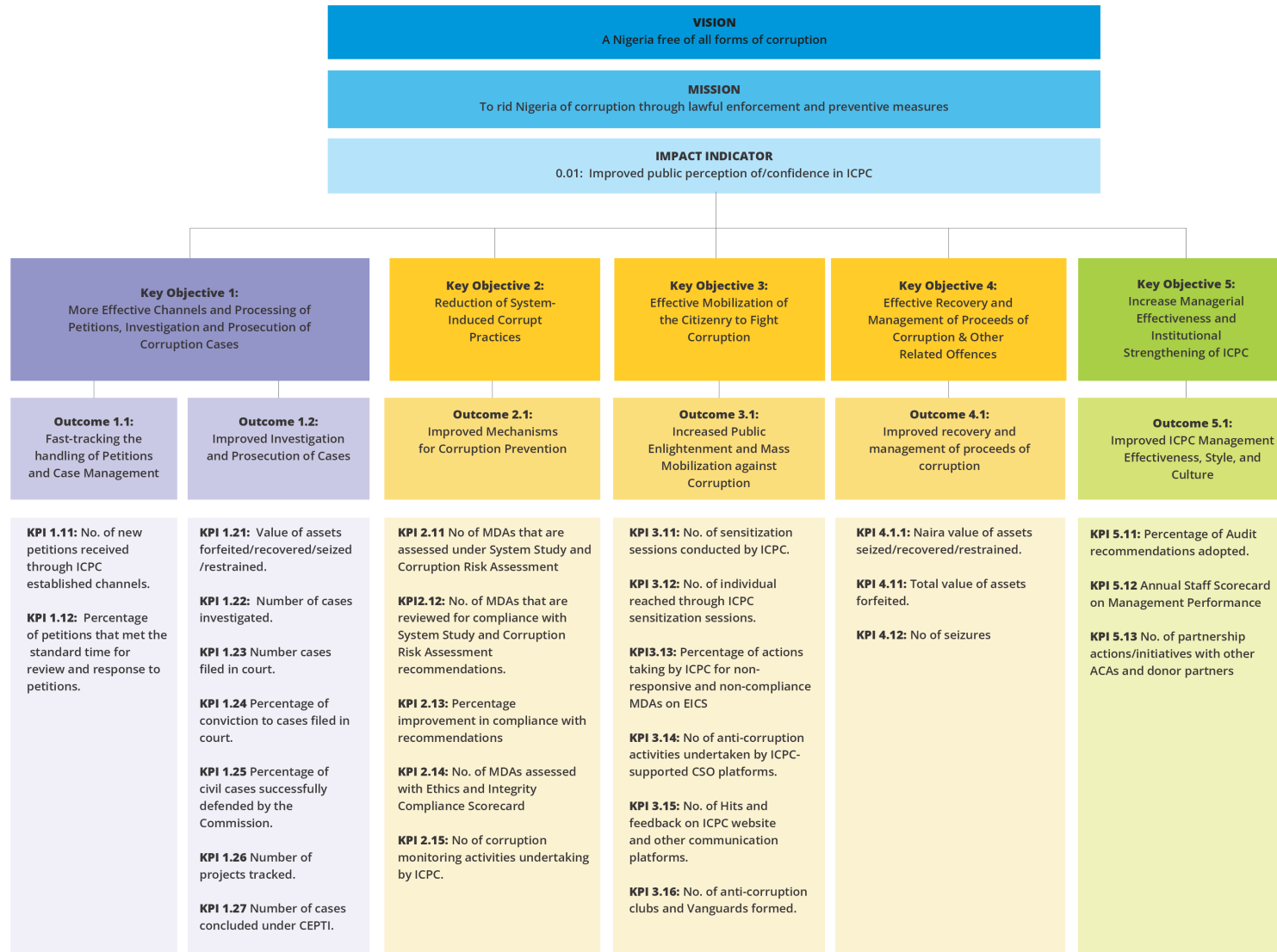
**Citizen Engagement and Mobilization:** Recognizing the power of collective action, the ICPC seeks to mobilize the citizenry in the fight against corruption. Through increased public enlightenment and mass mobilization initiatives, the Commission aims to raise awareness, foster a culture of integrity, and empower individuals to report corrupt practices, thereby creating a more active and vigilant society.

**Effective Asset Recovery and Management:** Recovering and managing the proceeds of corruption is crucial for both justice and deterrence. The ICPC will prioritize improving its capacity for asset tracing, recovery, and management, ensuring that ill-gotten gains are returned to the Nigerian people and that corrupt individuals are not able to benefit from their illicit activities.

**Organizational Strengthening and Effectiveness:** The ICPC understands that its success depends on its internal capacity and effectiveness. By focusing on improving management practices, fostering a positive organizational culture, and investing in staff development, the Commission can enhance its operational efficiency, effectiveness, and overall impact in the fight against corruption.



## ANNEX 1: RESULTS FRAMEWORK



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

S/NO	KPI No./Measure	Responsible Dept/Unit for KPI	Baseline 2023	Set-Target for 2024	Set-Target for 2025	Set-Target for 2026	Set-Target for 2027	Set-Target for 2028	Remarks
1.	KPI 1.11: No. of new petitions received through ICPC established channels.	SSD	1,187	1,200	1,250	1,300	1,350	1,400	
2	KPI 1.12: Percentage of petitions that met the standard time for review and response to petitions.	SSD	New	93%	94%	94%	95%	95%	
3.	KPI 1.21: Naira value of assets forfeited/recovered/seized/restrained.	Operations, POCD, SSRD, LSD & State Offices	67B	70B	75B	80B	85B	90B	
4.	KPI 1.22: Number of cases investigated	Operations, SSD, POCD & State Offices	131	150	200	250	300	350	
5.	KPI 1.23 Number cases filed in court	LSD & State Offices	63	80	85	90	95	100	
6	KPI 1.24 Percentage of conviction to cases filed in court.	LSD & State Offices	New						
7.	KPI 1.25 Percentage of civil cases successfully defended by the Commission.	LSD & State Offices	60%	65%	65%	65%	65%	65%	
8.	KPI 1.26 Number of projects tracked.	Operations Department, State Offices	1,721	2,000	2,050	2,100	2,150	2,200	



9.	KPI 1.27 Number of cases concluded under CEPTI	Operations Department (CEPTD) & State Offices	New							
10.	KPI 2.11 No of MDAs that are assessed under System Study and Corruption Risk Assessment	SSRD	20	25	30	35	40	45		
11.	KPI2.12: No. of MDAs that are reviewed for compliance with System Study and Corruption Risk Assessment recommendations.	SSRD	0	10	11	12	13	14		
12.	KPI 2.13: Percentage improvement in compliance with recommendations	SSRD	New							
13.	KPI 2.14: No. of MDAs assessed with Ethics and Integrity Compliance Scorecard	SSRD	368							
14.	KPI 2.15: No of corruption monitoring activities undertaken by ICPC.	SSRD	33	20	22	25	28	31		
15.	KPI 3.11: No. of sensitization sessions conducted by ICPC.	SSRD, PEED & State Offices	841	700	720	750	770	800		
16.	KPI 3.12: No. of individual reached through ICPC sensitization sessions.	SSRD, PEED & State Offices	240,429							
17.	KPI3.13: Percentage of actions taking by ICPC for non-responsive and non-compliance MDAs on EICS	SSRD	New							

18.	KPI 3.14: No of anti-corruption activities undertaken by ICPC-supported CSO platforms.	PEED & State Offices	47	67	87	107	127	147	
19.	KPI 3.15: No. of Hits and feedback on ICPC website and other communication platforms.	PEED & State Offices	47	67	87	107	127	147	
20.	KPI 3.16: No. of anti-corruption clubs and Vanguarders formed.	PEED & State Offices	177	198	216	238	267	294	
21.	KPI 4.11: Total value of assets forfeited.	POCD, LSD & State Offices	New						
22.	KPI 4.12: No of seizures	Operations, POCD & State Offices	New	200	300	400	500	600	
23.	KPI 5.11: Percentage of Audit recommendations adopted.	Finance & Accounts Dept	100%	100%	100%	100%	100%	100%	
24.	KPI 5.12 Annual Staff Scorecard on Management Performance	PRSD	80%	85%	87%	89%	91%	93%	
25.	KPI 5.13 No. of partnership actions/ initiatives with other ACAs and donor partners	ECU, Chairman's Office & Secretary's Office	21	25	25	27	28	30	

<b>VISION: A Nigeria free from all forms of Corruption</b>					
<b>MISSION: To Rid Nigeria of Corruption through Lawful Enforcement and Preventive Measures</b>					
Impact Indicator	Indicator Definition and Unit of Measurement	Data Source and Method	Collection Frequency	Baseline & Target	Comments (Data Utility, Justification, Assumptions, Constraints, etc.)
0.01-Improved public perception/confidence in the ICPC	<p><b>Definition:</b> This is the perception of the general public based on a national survey conducted across all states, utilising a valid sample of the population</p> <p><b>Unit of Measurement:</b> Percentage score based on the perception of the population</p>	Annual survey conducted by the ICPC in conjunction with the National Bureau of Statistics (NBS)	Annually	<p><b>Baseline:</b> TBD through baseline survey to be conducted in 2023, the beginning of the strategy implementation phase</p> <p><b>Target:</b> To be set after the 2023 survey</p>	This is an impact level of indicator and not for tracking by ICPC departments.
Impact Indicator	Indicator Definition and Unit of Measurement	Data Source and Method	Collection Frequency	Baseline & Target	Comments (Data Utility, Justification, Assumptions, Constraints, etc.)

<b>Key Objective 1: More Effective Channels and Processing of Petitions, Investigation and Prosecution of Corruption Cases</b>					
<b>Outcome 1.1: Fast-tracking the handling of Petitions and Case Management</b>					
KPI 1.11: No. of new petitions received through ICPC-established channels.	<p><b>Definition:</b> This is a count of petitions received through ICPC's various channels including ICPC website/emails and phone calls.</p> <p><b>Unit of Measurement:</b> Number</p>	Desk review of ICPC records	Collection Frequency	Baseline: 2023 – 1,187 Target: 2024 – 1,200 4.2% increase yearly	This indicator seeks to measure the extent to which ICPC is expanding the space and platform for public awareness and participation. It also reflects increasing public confidence in the ICPC
KPI 1.12: Percentage of petitions that met the standard time for review and response to petitions.	<p><b>Definition:</b> This refers to the percentage of all petitions that were processed (reviewed and responded to) within a predefined or standard timeframe. It measures how many of the submitted petitions were handled within the expected time limits set by the Commission.</p> <p><b>Unit of Measurement:</b> Percentage</p>	Desk review of ICPC records	Annually	<p><b>Baseline: TBD</b></p> <p><b>Target:</b> 2023 - Standards to be set. 2024 - 93% of standard met 2028 - 100%</p>	
List of Departments/ Units that contribute to the achievement of Outcomes and Objectives as well as their activities	<p><b>Special Services:</b></p> <ul style="list-style-type: none"> <li>• Advise on petitions for investigation.</li> <li>• Advise on post investigation report (prima facie or no case) for prosecution or re-investigation.</li> <li>• Drafting of charges in a timely manner and vetting of same for propriety.</li> <li>• Expeditious arraignment of accused persons in court</li> </ul>				

Outcome 1.2: Improved Investigation and Prosecution of Cases					
KPI 1.21: Value of assets forfeited/ recovered/seized/ restrained.	<p><b>Definition:</b> This is the Naira value of all assets forfeited, recovered, seized, and restrained.</p> <p><b>Unit of Measurement:</b> Naira</p>	Desk review of ICPC records by ICPC	Quarterly	<p><b>Baseline:</b> N67b</p> <p><b>Target:</b> 2023 – N70b 7.1% increase yearly</p>	This measures Commission's performance on its effort in recovery of illicit funds and assets that are proceeds of corruption.
KPI 1.22: Number of cases investigated.	<p><b>Definition:</b> This is a count of corruption cases that were investigated, of which final reports were submitted to the Hon. Chairman or other ACAs.</p> <p><b>Unit of Measurement:</b> Count of investigated cases concluded</p>	Desk review of ICPC/court records by ICPC	Quarterly	<p><b>Baseline:</b> 2023 - 131</p> <p><b>Target:</b> 2024- 960 20% increase yearly</p>	This indicator measures the performance of ICPC on its responsibility to effectively conclude cases assigned for investigation. This depends on in-flow of petitions sent to ICPC.
KPI 1.23: No. of cases filed in court.	<p><b>Definition:</b> This is a count of corruption cases that were investigated and filed for prosecution in a law court of competent jurisdiction</p> <p><b>Unit of Measurement:</b> Count of cases filed for prosecution</p>	Desk review of ICPC/court records by ICPC	Quarterly	<p><b>Baseline:</b> 2023- 63</p> <p><b>Target:</b> 2024 - 80 and increase by 5 Cases annually</p>	<p>This is an ICPC-wide performance measure, depending on in-flow of investigated cases and efficiency of the process to file cases in court.</p> <p>This measure recognises that the judicial system is independent and the ICPC cannot control the efficiency of the judicial process</p>

KPI 1.24 Percentage of conviction to cases filed in court.	<p><b>Definition:</b> This is the percentage of corruption cases for which the ICPC secured conviction in the law courts.</p> <p><b>Unit of Measurement:</b> Percentage</p>	Desk review of ICPC/court records by ICPC	Quarterly	<p><b>Baseline:</b> 2018 - 24</p> <p><b>Target:</b> 2019 - 30 and increase by 5 annually</p>	This will help ICPC to increase its efforts on sanctions and enforcement as its cardinal mandate, since the conviction of offenders will serve as deterrent for commission of corruption.
KPI 1.25 Percentage of civil cases successfully defended by the Commission.	<p><b>Definition:</b> This refers to the percentage of all civil legal cases in which the Commission successfully defended.</p> <p><b>Unit of Measurement:</b> Percentage</p>	Desk review of ICPC records by ICPC	Quarterly	<p><b>Baseline:</b> 2023 – 60%</p> <p><b>Target:</b> 2024 – 65%</p>	This will assess the performance of the Commission on how it has fared in civil cases filed against it.
KPI 1.26: No. of Projects tracked.	<p><b>Definition:</b> This is a count of projects tracked by ICPC under the Constituency and Executive Projects Tracking Initiative (CEPTI).</p> <p><b>Unit of Measurement:</b> Number</p>	Desk review of ICPC records	Quarterly	<p><b>Baseline:</b> 2023 - 1,721</p> <p><b>Target:</b> 2024 - 2000 and increase by 10% annually</p>	This will help ICPC to increase its efforts towards tracking of constituency and executive projects in order to ensure improvement of service delivery, good governance and value for money in the implementation of government projects.
List of Departments/ Units that contribute to the achievement of Outcomes and Objectives as well as their activities	<p><b>Operations, POCD, SSD, LSD, SSRD and State Offices</b></p> <ul style="list-style-type: none"> <li>● Advise on post investigation report (prima facie or no case) for prosecution or re-investigation.</li> <li>● Drafting of charges in a timely manner and vetting of same for propriety.</li> <li>● Expeditious arraignment of accused persons in court</li> <li>● Implement efficient case management systems to track and prioritize cases based on severity and impact.</li> </ul>				

	<ul style="list-style-type: none"> <li>• Ensure thorough and proper collection of evidence during investigations to build strong cases that can stand up in court.</li> <li>• Develop streamlined processes for the transition of cases from investigation to prosecution to minimize delays.</li> <li>• Prepare robust defence strategies for each case, including thorough research and gathering supporting evidence.</li> <li>• Create a comprehensive monitoring and evaluation framework to track all ongoing projects effectively.</li> <li>• Utilize advanced tracking tools and software to monitor project progress in real-time.</li> </ul>				
Impact Indicator	Indicator Definition and Unit of Measurement	Data Source and Method	Collection Frequency	Baseline & Target	Comments (Data Utility, Justification, Assumptions, Constraints, etc.)

## Key Objective 2: Reduction of System-Induced Corrupt Practices

### Outcome 2.1: Improved Mechanisms for Corruption Prevention

KPI 2.11 No of MDAs that are assessed under System Study and Corruption Risk Assessment	<p><b>Definition:</b> This is the number of MDAs that have been assessed for compliance with integrity management system under system studies and review and corruption risk assessment methodologies</p> <p><b>Unit of Measurement:</b> Number of MDAs assessed annually</p>	Desk review of ICPC records	Quarterly	<p><b>Baseline:</b> 20</p> <p><b>Target:</b> 2019 - 20 MDAs 20% increase yearly</p>	Through this strategy, ICPC is expected to use its preventive mandate to identify corruption vulnerabilities in the MDAs and develop integrity systems that would plug the loopholes in their systems.
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<p>This indicator will help assess the percentage of MDAs that complied with recommendations of the SS/CRAs conducted by the Commission</p>	<p><b>Definition:</b> This refers to the number of Systems Study conducted on MDAs to assess compliance with the recommendations of the SSR/ CRA earlier conducted</p> <p><b>Unit of Measurement:</b> Number</p>	<p>Annual MDA audit by ICPC</p>	<p>Quarterly</p>	<p><b>Baseline:</b> New initiative</p> <p><b>Target:</b> 2019 - 12 MDAs 20% increase yearly</p>	<p>This indicator will assist the Commission to gauge its preventive mandate performance in SSR &amp; CRA</p>
<p>KPI2.13: Percentage improvement in compliance with recommendations</p>	<p><b>Definition:</b> This refers to the percentage of MDAs that make progress in compliance with the System studies &amp; CRAs Recommendations</p> <p><b>Unit of Measurement:</b> Percentage</p>	<p>Annual MDA audit by ICPC</p>	<p>Quarterly</p>	<p><b>Baseline:</b> New initiative</p> <p><b>Target:</b> 2019 - 12 MDAs 20% increase yearly</p>	<p>This indicator will help assess the percentage of MDAs that complied with recommendations of the SS/CRAs conducted by the Commission</p>
<p>KPI2.14: No. of MDAs assessed with Ethics and Integrity Compliance Scorecard</p>	<p><b>Definition:</b> This is a count of MDAs that are assessed and graded with the Ethics and Compliance Scorecard</p> <p><b>Unit of Measurement:</b> Number</p>	<p>Desk review of ICPC records by ICPC and development partners</p>	<p>Quarterly</p>	<p><b>Baseline:</b> 2018 - New</p> <p><b>Target:</b> 2019 – 60 20% increase yearly</p>	<p>ICPC is expected to assess MDAs with the Ethics and Compliance Scorecard to ascertain their performance in terms of criteria set on the Scorecard.</p>



KPI2.15: No of corruption monitoring activities undertaken by ICPC.	<p><b>Definition:</b> This is a count of corruption monitoring activities including monitoring of budget execution by MDAs undertaken by ICPC</p> <p><b>Unit of Measurement:</b> Number</p>	Annual MDA audit by ICPC	Quarterly	<p><b>Baseline:</b> 2018 – 40</p> <p><b>Target:</b> 2019 – 60 20% increase yearly</p>	This will entail monitoring of budget execution of selected MDAs to ascertain their compliance with the provisions of anti-corruption legislation and regulations.
List of Departments/ Units that contribute to the achievement of the above Objective/ Outcome and Indicator as well as their activities.	<p><b>SSRD</b></p> <ul style="list-style-type: none"> <li>• Increase the number of trained staff dedicated to conducting system studies and corruption risk assessments.</li> <li>• Employ digital tools and software to facilitate data collection and analysis during assessments.</li> <li>• Establish a structured follow-up mechanism to review MDAs' compliance with recommendations.</li> <li>• Maintain detailed records of the compliance status of each MDA and produce regular reports.</li> <li>• Identify MDAs with low compliance rates and provide targeted interventions to assist them.</li> <li>• Offer training programs to MDA staff on how to implement and maintain compliance with recommendations.</li> <li>• Ensure the criteria for the Ethics and Integrity Compliance Scorecard are clear and standardized</li> </ul>				
Impact Indicator	Indicator Definition and Unit of Measurement	Data Source and Method	Collection/ Reporting Frequency	Baseline & Target	Comments (Data Utility, Justification, Assumptions, Constraints, etc.)

<b>Key Objective 3: Effective Mobilization of the Citizenry to Fight Corruption</b>					
<b>Outcome 3.1: Increased Public Enlightenment and Mass Mobilization against Corruption</b>					
KPI 3.11: No. of sensitization sessions conducted by ICPC.	<p><b>Definition:</b> This refers to the count of sensitization sessions conducted by the Commission. These include workshops, conferences, seminars, and paper presentations.</p> <p><b>Unit of Measurement:</b> Number</p>	Records of attendance at sessions and on-the-spot survey questionnaires administered	Quarterly	<p><b>Baseline:</b> 2018 - 538</p> <p><b>Target:</b> 2019 – 660 Increase by 10% yearly</p>	This indicator will help measure the impact of sensitizations conducted and the feedback generated for policy input.
KPI 3.12: No. of individual reached through ICPC sensitization sessions.	<p><b>Definition:</b> This refers to the count of people who have attended or been impacted by the sensitization programs conducted by the ICPC on corruption.</p> <p><b>Unit of Measurement:</b> Number</p>	Records of attendance at sensitization sessions	Quarterly	<p><b>Baseline:</b> 2023 – 240,029</p> <p><b>Target:</b> 2024 –</p>	This indicator will help measure the number of individuals reached out by the Commission through its sensitization effort.
KPI 3.13: Percentage of actions taking by ICPC for non-responsive and non-compliance MDAs on EICS	<p><b>Definition:</b> This refers to the percentage of measures or interventions implemented by the Commission against MDAs that failed to respond or comply with requirements related to the EICS.</p> <p><b>Unit of Measurement:</b> Percentage</p>	SSRD records of MDAs compliance to EICS	Quarterly	<p><b>Baseline:</b> New</p> <p><b>Target:</b> 2024 –</p>	This indicator measures the proportion of sanctions that the ICPC has implemented against MDAs that did not meet the required standards of responsiveness or compliance concerning the EICS.

<p>KPI 3.14: No. anti-corruption activities undertaken by ICPC-supported CSO platforms.</p>	<p><b>Definition:</b> This is a count of independent anti-corruption activities by ICPC's CSO partners which are supported by ICPC. This may include but not limited to procurement oversight, trainings, workshops, sensitizations, project implementation monitoring, media campaigns for increased accountability and budget tracking.</p> <p><b>Unit of Measurement:</b> Number</p>	<p>Desk review of ICPC and concerned CSOs' records for validation</p>	<p>Quarterly</p>	<p><b>Baseline:</b> 2023 – 47 <b>Target:</b> 2024 – 67 20% increase yearly</p>	<p>ICPC is expected to build the capacity of its CSO partners and encourage them to take actions to support increased transparency and accountability.</p>
<p>KPI 3.15: No. of Hits and feedback on ICPC website and other communication platforms.</p>	<p><b>Definition:</b> This is the frequency of hits on the ICPC website, is an indication of the level of public awareness and desire to connect with the Commission. This is not limited to ICPC website but extends to the hits on other social media platforms used by ICPC for campaigns and enlightenment.</p> <p><b>Unit of Measurement:</b> Number</p>	<p>Visits on the website, comments and replies to invitations made through social media platforms</p>	<p>Quarterly</p>	<p><b>Baseline:</b> 2023 – 8,077,944 hits <b>Target:</b> 2024 – 5 million hits</p>	<p>By this indicator, it is expected that ICPC will set up a functional/ interactive own-managed website for improved access by the public and for increased access to cutting edge resources for staff</p>

KPI 3.16: No. of anti-corruption clubs and Vanguards formed.	<p><b>Definition:</b> This refers to the number of inaugurations, outreach/empowerment platforms formed by the Commission in primary/secondary schools and tertiary institutions.</p> <p><b>Unit of Measurement:</b> Number</p>	Desk review of inauguration reports and records of activities undertaken by the Clubs/Vanguards	Quarterly	<p><b>Baseline:</b> 2023 – 177</p> <p><b>Target:</b> 2024 – 198</p> <p>20% increase yearly</p>	ICPC is expected to build the capacity of its CSO partners and also encourage them to take actions to support increased transparency and accountability.
List of Departments/ Units that contribute to the achievement of the above Objective/ Outcome and Indicator as well as their activities.	<p><b>PEED, SSRD and State Offices</b></p> <ul style="list-style-type: none"> <li>• Develop an annual plan outlining the number of sensitization sessions to be conducted, including topics and target audiences.</li> <li>• Collaborate with community groups, and other stakeholders to organize and host sensitization sessions.</li> <li>• Implement a feedback mechanism to evaluate the effectiveness of each session and identify areas for improvement.</li> <li>• Utilize a variety of formats for sensitization, such as workshops, seminars, webinars, and public lectures, to reach a wider audience.</li> <li>• Track attendance and gather participant information to measure reach and engagement accurately.</li> <li>• Foster collaboration and networking among CSOs to share best practices and coordinate activities.</li> <li>• Ensure the ICPC website is user-friendly, informative, and regularly updated with relevant content.</li> <li>• Partner with schools, colleges, and universities to establish anti-corruption clubs and vanguards.</li> </ul>				
Impact Indicator	Indicator Definition and Unit of Measurement	Data Source and Method	Collection/ Reporting Frequency	Baseline & Target	Comments (Data Utility, Justification, Assumptions, Constraints, etc.)

<b>Key Objective 4: Effective Recovery and Management of Proceeds of Corruption &amp; Other Related Offences</b>					
<b>Outcome 4.1: Improved recovery and management of proceeds of corruption</b>					
KPI 4.1.1: Naira value of assets seized/recovered/restrained.	<p><b>Definition:</b> This is the Naira value of all assets forfeited, recovered, seized, and restrained.</p> <p><b>Unit of Measurement:</b> Naira</p>	Desk review of ICPC records by ICPC	Quarterly	<p><b>Baseline:</b> N67b</p> <p><b>Target:</b> 2023 – N70b 7.1% increase yearly</p>	This measures Commission's performance on its effort in recovery of illicit funds and assets that are proceeds of corruption.
KPI 4.11: Total value of assets forfeited.	<p><b>Definition:</b> This refers to the cumulative Naira value of properties, funds, or other assets that have been legally seized and transferred to the ownership of the ICPC.</p> <p><b>Unit of Measurement:</b> Naira</p>	ICPC records of forfeited assets.	Quarterly	<p><b>Baseline:</b> New</p> <p><b>Target:</b> 2024 -</p>	This indicator will help quantify the total monetary value of all assets that have been confiscated and handed over to the ICPC.
KPI 4.12: No of seizures	<p><b>Definition:</b> This is the total count of instances where the ICPC has confiscated property, funds, or other assets.</p> <p><b>Unit of Measurement:</b> Number</p>	ICPC records of seized assets.	Quarterly	<p><b>Baseline:</b> New</p> <p><b>Target:</b> 2024-</p>	This indicator measures how many times the ICPC has carried out asset seizures.

List of Departments/ Units that contribute to the achievement of the above Objective/ Outcome and Indicator as well as their activities	<p><b>Operations, POCD, LSD and State Offices</b></p> <ul style="list-style-type: none"> <li>• Enhance asset tracing techniques through training and the use of advanced technology to identify and locate assets related to corruption.</li> <li>• Maintain accurate and detailed records of the value of assets seized, recovered, and restrained.</li> <li>• Regularly monitor and evaluate the forfeiture process to identify areas for improvement.</li> <li>• Conduct more frequent and targeted enforcement activities to identify and seize assets related to corrupt activities.</li> <li>• Improve intelligence gathering and analysis to identify opportunities for seizures.</li> </ul>				
Impact Indicator	Indicator Definition and Unit of Measurement	Data Source and Method	Collection/ Reporting Frequency	Baseline & Target	Comments (Data Utility, Justification, Assumptions, Constraints, etc.)

### Key Objective 5: Increase Managerial Effectiveness and Institutional Strengthening of ICPC

#### Outcome5.1: Improved ICPC Management Effectiveness, Style and Culture

KPI 5.11: Percentage of Audit recommendations adopted.	<p><b>Definition:</b> This refers to percentage increase in the adoption of External Auditor's recommendations by ICPC. It will involve the review of management letter on the audit.</p> <p><b>Unit of Measurement:</b> Percentage</p>	Audited Financial Statement and Management Reports.	Annually	<p><b>Baseline:</b> 2023 - 100%</p> <p><b>Target:</b> 2024 - 2028 100%</p>	This will ensure that the number of issues raised on the management letter in the previous year are reduced and improved upon when new audit is conducted.
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KPI 5.12 Annual Staff Scorecard on Management Performance	<p><b>Definition:</b> This is ICPC's score on the performance of management staff of ICPC on general administration of staff. This will be scored annually through a survey that will be conducted on staff from Grade Level 14 and below with exception of HOU's.</p> <p><b>Unit of Measurement:</b> Percentage</p>	Desk review of ICPC and other ACAs' records by development partners	Quarterly	<p><b>Baseline:</b> 2023 - 21</p> <p><b>Target:</b> 2024 - 25</p>	This indicator will help measure the collaboration and cooperation among ICPC, development partners and other ACAs.
List of Departments/ Units that contribute to the achievement of the above Objective/ Outcome and Indicators as well as their activities	<p><b>PRS, Finance and Accounts, ECU and Chairman/Secretary Offices</b></p> <ul style="list-style-type: none"> <li>• Introduce a more effective, rational and fairer evaluation system to evaluate performance of employees.</li> <li>• Reduce bureaucracy and increase emphasis on work quality improvement.</li> <li>• Promptly address issues raised by External Auditors on Management Report and Audited Financial Statement.</li> <li>• Promptly address issues raised on the Evaluation Reports on Plan Implementation by the Chairman/Board.</li> <li>• Consciously take steps to enhance workers' morale, loyalty and commitment.</li> <li>• Streamline organisational structure.</li> </ul>				

## ANNEX 3: ICPC M&E OPERATIONAL PLAN

<b>VISION: A Nigeria Free from all forms of Corruption</b>				
<b>MISSION: To Rid Nigeria of Corruption through Lawful Enforcement and Preventive Measures</b>				
Result Area/Strategy Recommendation	Key Actions (Outline the key steps/actions for implementing this recommendation)	Responsible Dept/ Unit	Timeline	Comments/Implementation Note
<b>Key Objective 1: More Effective Channels and Processing of Petitions, Investigation and Prosecution of Corruption Cases</b>				
<b>Outcome 1.1: Fast-tracking the handling of Petitions and Case Management</b>				
<b>Outputs and Activities:</b>				
Output 1.1.1 Enhanced safe reporting and feedback mechanisms created and introduced	1.1.1.1 Create and enhance safe reporting and feedback mechanisms for the stakeholders	SSD/ICT/PE&ED		ICPC is expected to set up an online portal for safe reporting and obtaining feedback for improved access and confidence by the public
Output 1.1.2 Strengthened policy and systems to support increased reporting.	Output 1.1.2 Strengthened policy and systems to support increased reporting.	SSD		Increased public information on the activities of ICPC is central to building public trust for increased reportage
	1.1.2.2 Develop guidelines for legal advisories on petitions	SSD		
	1.1.2.3 implement an in-house Witness Protection Programme to the Board for approval and implementation	Legal Services		



<b>Outcome 1.2: Improved Investigation and Prosecution of Cases</b>				
Output 1.2.1 Enhanced capacity of investigators and prosecutors through onsite and offsite training and provision of appropriate work tools	1.2.1.1 Develop and deliver regular/systematic need-based training programmes	Admin/HR		
	1.2.1.2 Undertake and scale-up projects tracking through stronger linkages with public and private sectors and CSOs.	Operations		Surveillance and recording equipment, vehicles, etc.
	1.2.1.3 Undertake a review of equipment needs for investigation and prosecution and acquire them.	Operations/ Legal Services/ Procurement		
	1.2.1.4 Undertake training of investigators and prosecutors on handling of cases.	ACAN		
	1.2.1.5 Undertake training of lawyers on the Administration of Criminal Justice Act (ACJA).	ACAN		
	1.2.1.6 Undertake training of lawyers on Corrupt Practices and Other Related Offences Act 2000 (ICPC Act 2000) and other relevant laws.	Legal Services/ ACAN		
	1.2.1.7 Undertake training of operatives and legal officers to understand Money Laundering cases.	ACAN		
	1.2.1.8 Conduct regular trainings for investigators in advanced investigative techniques, ethics and new developments in anti-corruption measures.	Operations/ ACAN		
	1.2.1.9 Undertake trainings for staff in investigation, prosecution and case management.	ACAN		

Output 1.2.2 Time-based case tracking system established and enforced	1.2.2.1 Develop operational framework for investigators and prosecutors for Money Laundering cases.	Operations/Legal Services		
	1.2.2.2 Develop a template for statistics on money laundering cases and implement it.	Operations/Legal Services		
	1.2.2.3 Upgrade and operationalize all modules of the Electronic Data Management System (EDMS).	ICT		
Output 1.2.3 Periodic case review timelines established with pre-set performance objectives and targets	1.2.3.1 Conduct monthly review of on-going cases in Court.	Legal Services		This is to be set up based on the historical understanding of the timelines and duration of cases by their types and complexities
	1.2.3.2 Conduct monthly review of on-going cases under investigation.	Operations		
Output 1.2.4 Implementation of specific targets and timelines for both the initiation to conclusion of investigations and from the conclusion of investigations to the filing of cases established.	1.2.4.1 Review and operationalize procedures for general information gathering analysis and handling of intelligent-led case.	Operations		
	1.2.4.2 Set targets and timelines between initiation of investigation and conclusion of investigation and ensure implementation	Operations		
	1.2.4.3 Set targets and timelines between conclusion of investigation and filing of cases and ensure implementation	Legal Services		

Output 1.2.5 Increased partnership with ACAs and other accountability institutions for a coordinated impact on the fight against corruption	1.2.5.1 Agree on mechanisms to share information and training opportunities with other ACAs and set up technology aided platform in this regard.	Operations/ICT/ECU		For example, the placement of ICPC Desk Officer in the NFIU and SCUML would be an important step forward in joint work and strengthen the capacity of ICPC
	1.2.5.2 Agree on mechanisms for collaboration with Anti-Corruption Agencies (ACAs) in key areas of investigation, prosecution, intelligence sharing and joint operations.	Operations/Legal Services		
Result Area/Strategy Recommendation	Key Actions (Outline the key steps/actions for implementing this recommendation)	Responsible Dept/ Unit	Timeline	Comments/ Implementation Note

## Key Objective 2: Reduction of System-Induced Corrupt Practices

### Outcome 2.1: Improved Mechanisms for Corruption Prevention

Output 2.1.1 Strengthened Systems Study and corruption risk assessments (CRAs) of MDAs to determine corruption-prone processes, procedures and policies; review same as well as direct and monitor compliance	2.1.1.1 Review the standard step-by-step procedural manual for conduct of Systems Study and Review (SSR) of MDAs and operationalize it.	SSRD		The systematic conduct of studies, development and implementation of integrity plan on the studied MDAs are necessary to give credibility to this function. ICPC has the legal powers to advise and where necessary, direct on specific corrective measures in MDAs.
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	2.1.1.2 Provide training on Systems Study Methodology for staff with specific responsibilities for systems study.	SSRD		
	2.1.1.3 Conduct System Studies of MDAs, develop integrity plan and monitor implementation.	SSRD		
	2.1.1.4 Carry out follow-up compliance review of the MDAs studied to ascertain compliance of recommendations.	SSRD		
	2.1.1.5 Conduct Corruption Risk Assessments (CRA) of MDAs, develop integrity plan and monitor implementation.	SSRD		
Output 2.1.2 Reporting format for all ACTUs deployed and enforced.	2.1.2.1 Implement ACTU Effectiveness Index and ACTU Reporting Template to enhance performance review of ACTUs.	SSRD		
	2.1.2.2 Publish Annual Report on the performance of ACTUs including the reporting frequency and achievement of targets by the ACTUs as well as follow-up actions.	SSRD		
	2.1.2.3 Publish names of MDAs in breach of Compliance with the establishment of ACTUs, ICPC's Ethics and Compliance Scorecard, SSR, CRA and make appropriate recommendations.	SSRD		
Output 2.1.3 Increased partnership with OHCSF for a coordinated impact on the fight against corruption	2.1.3.1 Strengthen partnership between ICPC and Office of the Head of Civil Service of the Federation (OHCSF) towards increased oversight of ACTUs in MDAs.	SSRD		

Output 2.1.4 Completed Integrity Compliance Scorecard to assess MDAs' risk vulnerability	2.1.4.1 Ensure full implementation/ deployment of ICPC's Ethics and Compliance Scorecard in MDAs and publish the results.	SSRD		
Output 2.1.5 Strengthened capacity of the ACTUs	2.1.5.1 Develop and implement certification and training for ACTUs in MDAs.	ACAN		
	2.1.5.2 Train ACTUs on the implementation of their procurement oversight in MDAs.	ACAN		
	2.1.5.3 Train ACTUs on the implementation of the National Anti-Corruption Strategy (NACS) and to double as MDAs' NACS Committee.	ACAN		
Output 2.1.6 Increased partnership with Federal, States and Local Governments at the sub-national level to mainstream anti-corruption activities.	2.1.6.1 Encourage State Governments to establish ACTUs in state MDAs and LGCs.	SSRD/State Offices.		
	2.1.6.2 Encourage the conduct of CRAs and System Studies at state and local government levels, incorporating implementation, and monitoring of integrity plans.	SSRD/State Offices		
	2.1.6.3 Undertake monitoring of government activities on recruitments, promotions, bid evaluation and other related activities.	SSRD		
	2.1.6.4 Undertake tracking of Local Government funds and its utilization.	Operations/SSRD		
	2.1.6.5 Undertake tracking and monitoring of Government Special intervention funds.	Operations/SSRD		

	2.1.6.6 Undertake the enforcement of Presidential Enabling Business Environment Council (PEBEC) recommendations on ease of doing business.	Operations/SSRD		
	2.1.6.7 Liaise with the Office of the Secretary to the Government of the Federation (OSGF) for mandatory screening of public officers nominated for appointment.	Operations		
Result Area/ Strategy Recommendation	Key Actions (Outline the key steps/actions for implementing this recommendation)	Responsible Dept/ Unit	Timeline	Comments/Implementation Note

### Key Objective 3: Effective Mobilization of the Citizenry to Fight Corruption

#### Outcome 3.1: Increased Public Enlightenment and Mass Mobilization against Corruption

Output 3.1.1 Enhanced capacities for various stakeholders in the fight against corruption in corruption prevention, detection, and effective reporting.	3.1.1.1 Undertake training of information, public relations, protocol, media and education officers.	PE&ED/ ACAN		
	3.1.1.2 Organize training for officials of other anti-corruption agencies at national and sub-national levels to build their capacities in the use of ICT in investigation and prevention of corruption.	ACAN		
	3.1.1.3 Organize training on corruption detection and prevention for operators in the Nigerian Maritime Sector.	ACAN		
	3.1.1.4 Undertake strategic leadership training on anti-corruption and other related issues for State Legislators.	ACAN		

	3.1.1.5 Undertake training of Clerks, Deputy Clerks, Committee Secretaries and other administrative officers in the legislature on strategic anti-corruption support.	ACAN		
	3.1.1.6 Hold sensitization/training program on the NEIP, NVC, Anti-Sexual Harassment Policy, etc., for teachers and lecturers at state-owned schools as well as private-owned institutions/ schools.	PE&ED/SHART		
	3.1.1.7 Conduct periodic training for civil servants on corruption issues and code of conduct.	ACAN		
	3.1.1.8 Incorporate modules on corruption studies in formal management development programs for civil/public servants.	ACAN		
	3.1.1.9 Conduct integrity training for government officials at State and Local Government levels.	ACAN		
	3.1.1.10 Organize periodic training for media practitioners on effective reportage of the ICPC activities and policies.	PE&ED		
	3.1.1.11 Partner with relevant Federal and State agencies to develop/review Codes of Ethics for State MDAs and Local Government Staff and incorporate Ethics training for the staff.	SSRD/ACAN		
Output 3.1.2 Improved awareness and knowledge of the scourge of corruption in schools and public institutions	3.1.2.1 Increase the use of multi -lingua approach in local languages for mass mobilization	PE&ED		

	3.1.2.2 Develop a Communication Strategy that ensures proactive and regular communication via all mediums including print, broadcast and social media	PE&ED		
	3.1.2.3 Support CSOs to engage in the fight against corruption at different levels/ platforms and submit report to ICPC.	PE&ED		
	3.1.2.4 Hold pupils/students' competition about Anti-corruption issues.	PE&ED		
	3.1.2.5 Ensure the sensitisation of corps members and mobilization against corruption at the national and sub national levels.	PE&ED		
	3.1.2.6 Establish new Anti-corruption Clubs and Student Anti-corruption Vanguard in institutions of learning across the country and rejuvenate the inactive ones.	PE&ED		
	3.1.2.7 Sensitise critical stakeholders such as professional bodies, faith-based organizations, community-based organizations, women organizations, traditional rulers and youth organizations on anti-corruption issues.	PE&ED		
	3.1.2.8 Hold annual integrity award to recognize serving public servants and other deserving Nigerians who exhibited exceptional act of integrity.	PE&ED		
	3.1.2.9 Undertake activities that will harness and publicise the positive impact of the Commission's activities in communities.	PE&ED		



Output 3.1.3 Enhanced governance and educational standards in all institutions at the federal, state and private levels.	3.1.3.1 Organize policy dialogues for public and private sectors.	ACAN		
	3.1.3.2 Ensure Implementation of the National Ethics and Integrity Policy (NEIP) workplan across States and Local Government levels.	PE&ED		
	3.1.3.3 Facilitate the adoption of sexual harassment policy in schools.	PE&ED/ SHART		
	3.1.3.4 Partner with Nigerian Educational Research and Development Council (NERDC) to review National Values Curriculum (NVC) and identify gaps and introduce the curriculum into all levels of the educational system at the Federal, State and private-owned schools.	PE&ED		
Result Area/ Strategy Recommendation	Key Actions (Outline the key steps/actions for implementing this recommendation)	Responsible Dept/ Unit	Timeline	Comments/Implementation Note

#### Key Objective 4: Effective Recovery and Management of Proceeds of Corruption & Other Related Offences

##### Outcome 4.1: Improved recovery and management of proceeds of corruption

Output 4.1.1 Enhanced capacity of Investigators in tracing, recovery and management of recovered assets.	4.1.1.1 Undertake specialized continuous capacity building for operatives and legal officers on the reviewed Asset Recovery Manual.	POCD/ACAN		
	4.1.1.2 Undertake training of investigators, prosecutors and asset managers on asset forfeiture provisions, procedures and management.	ACAN		

	4.1.1.3 Conduct training on beneficial ownership evidence, assets recovery and management for lawyers, investigators and other relevant officers.	ACAN		
	4.1.1.4 Conduct training for staff on UNCAC framework on the repatriation of stolen assets.	POCD/ACAN		
Output 4.1.2 Assets tracing and recovery technological tools and manual reviewed.	4.1.2.1 Undertake a review of Asset Tracing, Recovery and Management Manual	POCD		
	4.1.2.2 Undertake review of technological tools required for Asset Tracing and Recovery and acquire them.	POCD/Procurement		
Output 4.1.3 Improved policy, measures and mechanism for assets tracked, recovered and disposed.	4.1.3.1 Develop more measures to restrain, seize, confiscate, recover and repatriate where necessary, proceeds of crime/ corruption.	POCD		
	4.1.3.2 Develop mechanism for profiling of suspects, family members and associates for tracking of corruption proceeds and assets.	POCD		
	4.1.3.3 Develop a policy on classification and disposal of perishable assets.	POCD		
Output 4.1.3 Improved policy, measures and mechanism for assets tracked, recovered and disposed	4.1.3.1 Develop more measures to restrain, seize, confiscate, recover and repatriate where necessary, proceeds of crime/ corruption.	POCD		
	4.1.3.2 Develop mechanism for profiling of suspects, family members and associates for tracking of corruption proceeds and assets.	POCD		

	4.1.3.3 Develop a policy on classification and disposal of perishable assets.	POCD		
Output 4.1.4 Improved partnership with other ACAs and stakeholders with respect to information sharing and recovery of proceeds of corruption.	4.1.4.1 Agree on arrangements and protocols with ACAs, regulators and other relevant stakeholders for sharing specifically defined categories of information.	POCD/Operations		
	4.1.4.2 Collaborate with relevant bodies in the recovery of unpaid taxes, rates and revenue due to the Federal Government and ensure compliance with relevant laws.	POCD		
	4.1.4.3 Undertake monitoring of the real estate sector in relation to proceeds of corruption, money laundering and illicit financial flows.	POCD		
Output 4.1.5 Proceeds of crime outside the country recovered.	4.1.5.1 Carry out routine request for mutual legal assistance in all investigations relating to asset recovery and repatriation.	Legal Services		
Result Area/ Strategy Recommendation	Key Actions (Outline the key steps/actions for implementing this recommendation)	Responsible Dept/ Unit	Timeline	Comments/Implementation Note

<b>Key Objective 5: Increase Managerial Effectiveness and Institutional Strengthening of ICPC</b>				
<b>Outcome 5.1: Improved ICPC Management Effectiveness, Style, and Culture</b>				
Output 5.1.1 More effective and objective system for employees' performance evaluation	5.1.1.1 Design and automate Performance Management System (PMS) for the Commission.	Admin & HR/ICT		
	5.1.1.2 Organize annual performance award for outstanding departments and staff.	Admin & HR/PRS		
	5.1.1.3 Increase effectiveness and efficiency through setting clear departmental and individual job descriptions to enhance the achievement of departmental goals.	Admin & HR/All Departments		
Output 5.1.2 Improved ICPC work quality and reduced bureaucracy.	5.1.2.1 Develop and implement mechanisms and standards for prompt release of operational funds to facilitate speedy discharge of functions at a maximum time of 48 hours.	Finance & Accounts		
	5.1.2.2 Employ and post officers with requisite skills to the relevant departments.	Admin & HR		
	5.1.1.3 Facilitate the preparation of Annual Work Plan of the strategic and routine activities.	PRS		
	5.1.2.4 Conduct timely staff Confirmation, Promotion and Conversion exercise.	Admin & HR		
Output 5.1.3 Developed Systems of "How tos" (Operational Processes, policies & Manuals) for key operational processes: reporting, meetings, etc.	5.1.3.1 Produce a step-by-step operational manual/SOPs for Departments/Units/State Offices/ACAN to ensure effective orientation of new staff and sustainability of operations.	Admin & HR/All Departments		
	5.1.3.2 Initiate and develop appropriate Standing Orders to guide effective and efficient operations of the Commission.	Office of the Hon. Chairman		

	5.1.3.3 Develop a charter for ICPC service delivery/compliance and implement it.	Reform		
	5.1.3.4 Develop a robust cybersecurity policies and protocols, including regular audits and vulnerability assessments to ensure data security and minimize breach risks.	ICT		
	5.1.3.5 Facilitate the amendment of the ICPC Act, 2000.	Office of the Hon. Chairman/Legal Services		
	5.1.3.6 Implement National Whistleblower Policy & Incentive Programme at the Commission's level.	Office of the Hon. Chairman/Operations		
	5.1.3.7 Facilitate the approval and implementation of the ICPC Conditions of Service.	Office of the Hon. Chairman/Office of the Sec./Com.		
	5.1.3.8 Initiate, develop and implement internal disciplinary procedures in line with Law Enforcement Agencies (LEAs).	Office of the Sec./Com.		
	5.1.3.9 Facilitate the implementation of policies formulated and approved by the Commission's Board.	Office of the Sec./Com.		
	5.1.3.11 Introduce anonymous reporting mechanism for all officers of the Commission regarding irregularities in their Departments/Units.	Reform/ACTU		
	5.1.3.12 Carry out regular review of internal controls of the Commission.	Audit		

Output 5.1.4 Enhanced training policy to meet the development needs of the Commission	5.1.4.1 Review the Training Policy of the Commission and integrate the implementation plan.	Admin & HR		
	5.1.4.2 Undertake training on administrative measures for controlling workplace corruption for Administrators, Human Capital Development officers, Human Resources Managers, Inventory officers, Store officers, Registry officers and those in related roles.	ACAN		
	5.1.4.3 Undertake training of ICPC staff on code of ethics.	Admin & HR		
	5.1.4.4 Implement Digital Skills Training to improve digital literacy and skills among employees focusing on new technologies that the organization plans to deploy.	ICT		
	5.1.4.5 Undertake rank and cadre based appropriate staff trainings.	Admin & HR		
	5.1.4.6 Facilitate the approval, training and deployment of ICPC Armed Squad.	Office of the Chairman/Office of the Sec./Com.		
Output 5.1.5 Enhanced ICT strategy for ICPC to upgrade the Commission's ICT infrastructure and capacity	5.1.5.1 Develop a Digital Transformation Plan and Roadmap for the Commission.	ICT		
	5.1.5.2 Undertake upgrade of ICT infrastructure and systems to ensure a robust, secure and flexible ICT environment that can adapt to evolving challenges.	ICT		

	5.1.5.3 Conduct bi-annual system update of computer systems in the Commission to reduce the risk of technological obsolescence.	ICT		
	5.1.5.4 Develop an online data portal for submission of Commission's statistics.	PRS/ICT		
Output 5.1.6 Evaluation of progress in plan implementation undertaken on a periodic basis	5.1.6.1 Undertake Management Feedback Survey on strategy implementation to establish the degree of compliance among top management.	PRS		
	5.1.6.2 Undertake Employee Feedback Survey on strategy implementation to establish the current degree of alignment and engagement among Staff.	PRS		
	5.1.6.3 Conduct survey on public perception of ICPC in conjunction with the National Bureau of Statistics (NBS) to measure stakeholders' satisfaction levels and the Commission's performance at the beginning and end of the Plan.	PRS/ACAN		
	5.1.6.4 Undertake a mid-term and final evaluation of plan implementation.	PRS		
	5.1.6.5 Undertake Employee Feedback Survey to evaluate the performance of Board and Management (including RACCs).	PRS		
	5.1.4.6 Facilitate the approval, training and deployment of ICPC Armed Squad.	Office of the Chairman/Office of the Sec./Com.		
	5.1.6.6 Prepare and present Quarterly Performance Reports on the strategic plan implementation for consideration by Chairman/Board.	PRS		

	5.1.6.7 Establish Mechanisms for regular feedback and evaluation to monitor adherence to the policy thrust and identify areas of improvement.	PRS		
	5.1.6.8 Undertake research on topical corruption related matters and issues of interest.	PRS/ACAN		
	5.1.6.9 Institute mechanism for conduct of periodic integrity checks and tests on staff of the Commission.	Office of the Hon. Chairman		
Output 5.1.7 Devised budget proposal for the implementation of the Strategic Plan covering its full duration	5.1.7.1 Undertake a financial planning exercise to cost the implementation of the Strategic Plan.	Finance & Accounts/ PRS		
Output 5.1.8 Strengthened partnership with key stakeholders to combat corruption	5.1.8.1 Explore and initiate direct bilateral engagements with development partners, embassies, international organizations and MDAs for knowledge sharing, international and local cooperation, capacity building, exchange of program, technical assistance and logistics provision.	ECU		







# STRATEGIC ACTION PLAN

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2024-2028