



STRATEGIC ACTION PLAN

2024-2028 →

INDEPENDENT CORRUPT PRACTICES
AND OTHER RELATED OFFENCES
COMMISSION (ICPC)

www.icpc.gov.ng

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
CP	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
NEIT	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
SCUM	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

The Independent Corrupt Practices and Other Related Offences Commission (ICPC) extends its sincere gratitude to the Board of the Commission for their instrumental role in the development of the 2024 – 2028 Strategic Plan. The Board's robust contributions during the workshop were invaluable in shaping the plan to the required standard.

We also express our profound gratitude to the Hon. Chairman for his unwavering encouragement, guidance, and drive to get the job done. His insightful admonitions and clear direction kept us on course. Our special thanks go to the Secretary to the Commission for providing the necessary administrative platform to steer the process to a successful conclusion.

We are grateful to all Directors and Management staff of the Commission for their continuous support throughout this journey. Special recognition goes to the Chief of Staff to the Hon. Chairman and the Special Assistant to the Hon. Chairman on Communication, both of whom 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.

The collaborative role played by our development partners during the planning

process deserves special mention, particularly the Rule of Law and Anti-Corruption, Phase 2 (RoLAC II) Programme, funded by the European Union (EU) and implemented by the International Institute for Electoral Assistance (IDEA). 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.

The development of this strategic plan would not have been possible without the immense contributions and unwavering support of the esteemed Board of the Commission. Their insightful guidance, strategic vision, and dedication to the cause of fighting corruption have been instrumental in shaping this robust and impactful roadmap for the years ahead. I extend my deepest gratitude to each member of the Board for their invaluable contributions.

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, 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:
Power of investigation, search, seizure, arrest, prosecution and trial of offences

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 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.



2.4 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.





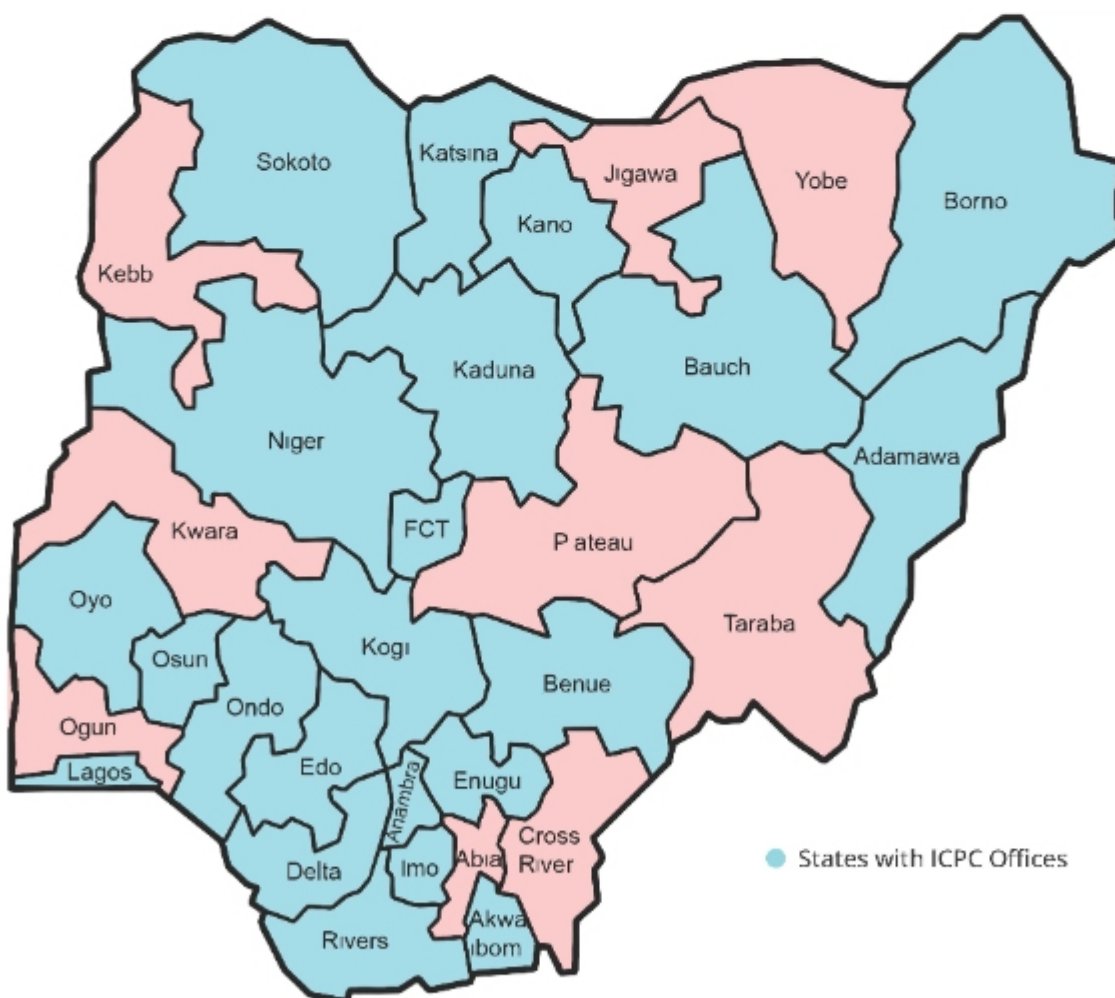
ICPC ACADEMY

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 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 (Prevention and Prohibition) Act, (MLPPA) 2022 addressed money laundering and associated predicate offences. The MLPPA2022 provided for the establishment of the Special Control Unit against Money Laundering (SCUML) with the EFCC as a dedicated regulator for Designated Non-Financial Businesses and Professionals.
- The Proceed of Crime (Recovery and Management) Act (POCA) 2022 provides the basis for effective and efficient management of proceeds of crime offences as well as the disposal of assets.
- The Federal Executive Council approved the National Anti-Corruption Strategy for the first time in 2017, and the implementation spanned from 2017 to 2021. To ensure the effective delivery of the objectives of the Strategy, the NACS 2017 – 2021 was further extended for implementation for another five years. Efforts were made by the Commission to implement the NACS by aligning its Strategic Plan 2019 – 2023 with the NACS. The Commission has also made a deliberate effort to align this current Strategy with the new NACS.

Also, 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.



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

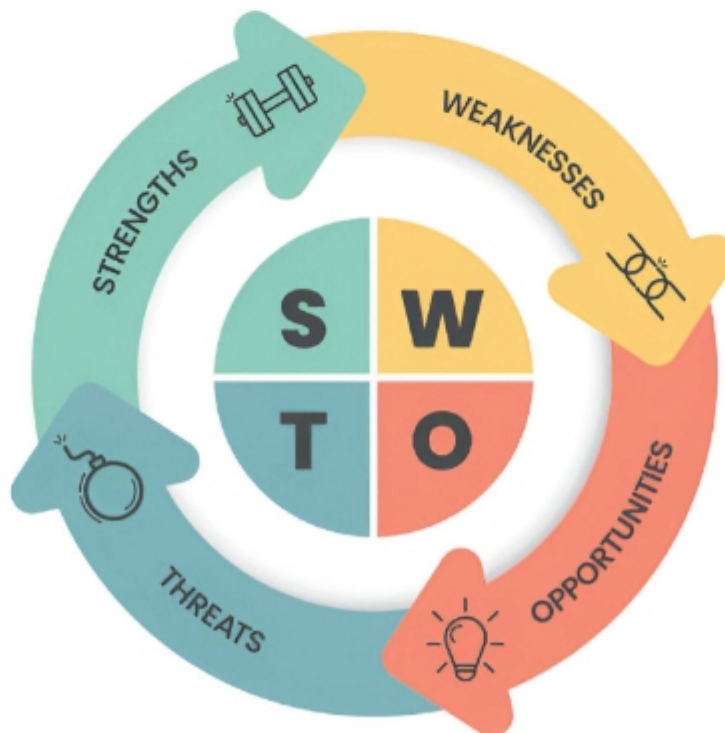
5.1 EXTERNAL ENVIRONMENT

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 UNDP.

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



5.3 STAKEHOLDERS ANALYSIS

Key Stakeholders:

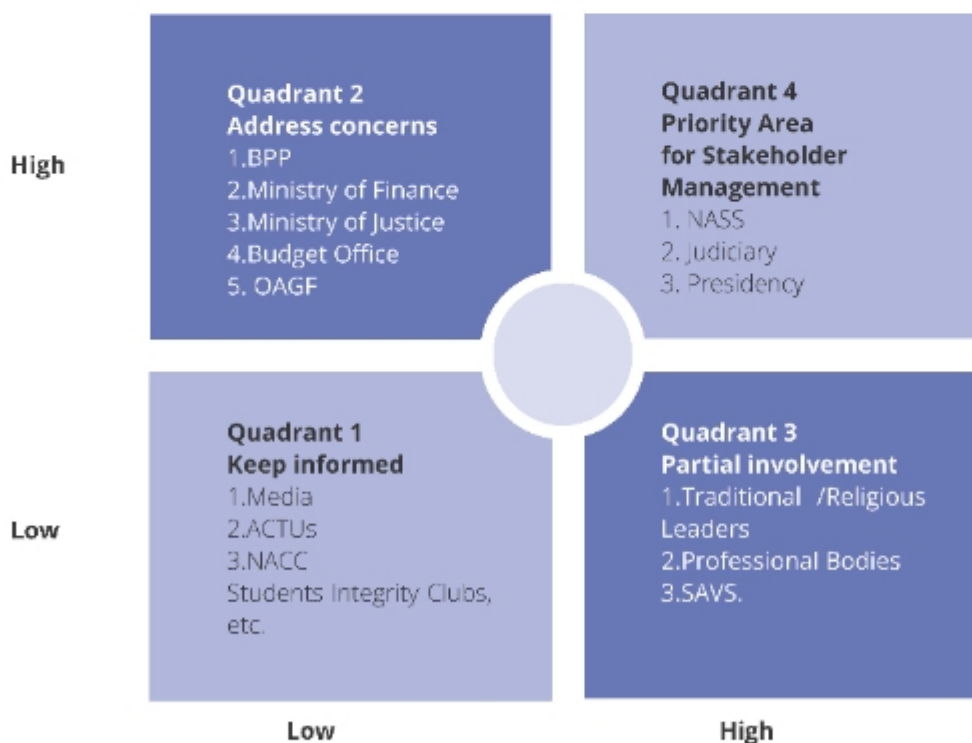
Internal:

- CPC 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

Political Interference:

External pressure in cases involving high-profile individuals can hinder investigations and prosecutions.

Financial Constraints:

Inadequate funding limits the Commission's capacity to conduct comprehensive investigations, prosecutions, preventive measures, and public awareness campaigns.

Technological Vulnerability:

Threats to ICT infrastructure pose risks to data security and operational efficiency.

Legislative Limitations:

Delays in amending the ICPC Act and existing deficiencies hinder the Commission's ability to adapt to evolving challenges.

Judicial Delays:

Slow judicial processes impede the timely resolution of corruption cases, potentially undermining deterrence efforts.

Personnel Security:

Inadequate security measures for staff engaged in sensitive investigations pose risks to their safety.

Socio-Cultural Factors:

Societal tolerance for corruption and public apathy present significant obstacles to anti-corruption efforts.

ACTU Effectiveness:

Limited funding and operational independence hinder the effectiveness of Anti-Corruption and Transparency Units (ACTUs) within MDAs.

Internal Conflicts of Interest:

The loyalty of MDA staff responsible for ACTUs may be compromised when dealing with internal corruption issues.



A cross-section of school anti-corruption club

5.4.3 Strategies to address the identified challenges





RISK ASSESSMENT

Assumptions and Risk	Impact and Risk Management
<p>Assumption: It is assumed that the government will increase funding to enable the ICPC improve its operations.</p> <p>Risk: Inadequate funding by the government to ICPC will slow down the Commission's operations and adversely affect its performance.</p>	<p>Impact: Incomplete implementation of the strategic plan would impact negatively on the performance of the Commission.</p> <p>Risk management: 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>Assumption: Collaboration with the Judiciary will help in addressing the challenges in delay of trial cases.</p> <p>Risk: Delay in the trial of cases transmits wrong signals to citizens giving the impression that people are not punished for corruption.</p>	<p>Impact: Wrong perception of the people about the inability of the Judiciary to try corruption cases.</p> <p>Risk management: Ensure close collaboration with the Judiciary through the Nigerian Bar Association, National Judicial Council, National Judicial Institute, etc.</p>
<p>Assumption: 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>Risk: Despite independence of the Commission, there might be attempts to interfere with the mandate by politically exposed persons (PEPs).</p>	<p>Impact: Selective enforcement of the anti-corruption laws may make the people see the anti-corruption campaign as a charade.</p> <p>Risk management: Ensure enforcement of the ICPC mandate and observance of the rule of law.</p>
<p>Assumption: Operational effectiveness will not be impaired by the existence of a number of ACAs with similar mandates.</p> <p>Risk: Continued competition and lack of coordination among ACAs will cause loss of confidence in ICPC by the public and government, leading to disbandment or fundamental reorganisation.</p>	<p>Impact: Overlapping of functions will reduce operational effectiveness and public support for ACAs.</p> <p>Risk management: ICPC should focus on its mandate and area of competitive advantages and be proactive in inter-agency cooperation.</p>
<p>Assumption: The enthronement of ethics in Nigerian society and revival of traditional values will enhance the quest for a corruption-free Nigeria.</p> <p>Risk: The continued erosion of ethics and values in the society will make the efforts to fight corruption more difficult.</p>	<p>Impact: Distorted value system which glorifies ill-gotten wealth as well as ethnic and religious differences will aid corruption.</p> <p>Risk management: 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: 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



Board members and the Chairman ICPC during the Strategic Action Plan Development Workshop in Lagos

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.

Accountability: Upholding the highest standards of professionalism, diligently fulfilling responsibilities in accordance with best practices, and demonstrating unwavering commitment to competence and ethical conduct.

Nurturing Excellence: Cultivating a culture of continuous learning and development, encouraging innovation, and consistently striving for the highest standards of performance and service delivery.

Ownership: Taking full responsibility for individual and collective actions, striving for continuous improvement, and ensuring the delivery of high-quality results that meet or exceed established performance standards.



Collaboration: Fostering a culture of teamwork and cooperation, where individuals actively support and complement each other's efforts to achieve shared objectives.

Tenacity: Demonstrating unwavering dedication, determination, and perseverance in the pursuit of goals, while maintaining efficiency and a results-oriented approach.

Integrity: Acting with impartiality, honesty, and transparency, always prioritizing the public interest and upholding the highest ethical standards.

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



8. 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 instill 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.

9. 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: RESULT FRAMEWORK AND PERFORMANCE MONITORING MATRIX



ANNEX 2: ICPC PERFORMANCE MONITORING MATRIX

VISION: A Nigeria free from all forms of Corruption						
MISSION: To Rid Nigeria of Corruption through Lawful Enforcement and Preventive Measures						
Impact Indicator	Indicator Definition and Unit of Measurement	Data Source and Method	Collection Frequency	Baseline & Target	Comments (Data Utility, Justification, Assumptions, Constraints, etc.)	
0.01-Improved public perception/confidence in the ICPC	<p>Definition: 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>Unit of Measurement: 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)	One-Off	<p>Baseline: TBD through baseline survey to be conducted in 2024, the beginning of the strategy implementation phase</p> <p>Target: To be set after the 2024 survey</p>	This is an impact level of indicator and not for tracking by ICPC departments.	
Key Objective 1: More Effective Channels and Processing of Petitions, Investigation and Prosecution of Corruption Cases						
KPI 1.01: Percentage of investigations concluded to assigned cases.	<p>Definition: This is the achievement in percentage, of the number of investigations concluded of which final reports were submitted to the Chairman compared to the number of corruption cases assigned for investigation.</p> <p>Unit of Measurement: Percentage</p>	Desk review of records by Operations	Quarterly	<p>Baseline: 2023 – 46%</p> <p>Target: 2024 – 70% Increase by % annually</p>	This indicator measures the delivery level of ICPC on its responsibility to effectively conclude cases assigned for investigation. The cases assigned are based on petitions within the jurisdiction of ICPC after due vetting.	

<p>KPI 1.02: Percentage of convictions secured to prosecutions concluded.</p>	<p>Definition: This is the percentage of the number of convictions secured on corruption cases compared to the total number of prosecutions concluded in courts. The prosecutions concluded include convictions, acquittals (i.e. lost cases), and withdrawn cases. Unit of Measurement: Percentage</p>	<p>Desk review of records by Legal Services</p>	<p>Quarterly</p>	<p>Baseline: 2023 – 47% Target: 2024 – 65% 65% annually</p>	<p>This will help to measure the rate of convictions compared with prosecutions concluded in courts. It will increase its efforts on sanctions and enforcement since the conviction of offenders will serve as a deterrent for the commission of corruption.</p>
<p>KPI 1.03: Percentage of civil cases successfully defended by the Commission.</p>	<p>Definition: This refers to the percentage of all civil legal cases in which the Commission successfully defended. Unit of Measurement: Percentage</p>	<p>Desk review of records by Legal Services</p>	<p>Quarterly</p>	<p>Baseline: 2023 – 60% Target: 2024 – 65% Increase by 2.5 annually</p>	<p>This will assess the performance of the Commission on how it has fared in civil cases filed against it.</p>
<p>KPI 1.04: Percentage of cases concluded to cases identified for investigation under CEPTI.</p>	<p>Definition: This is the percentage of cases concluded by ICPC under the Constituency and Executive Projects Tracking Initiative (CEPTI) compared to projects identified for investigation from project tracking. Unit of Measurement: Percentage</p>	<p>Desk review of records by Operations</p>	<p>Quarterly</p>	<p>Baseline: 2023 - New Target: 2024 – 70% Increase by 5 annually</p>	<p>This will measure the delivery rate of investigations arising from the Constituency and Executive Projects Tracking Initiative; hence, will encourage prompt conclusion of the investigation of projects identified further for investigation.</p>

<p>KPI 1.05: Percentage of actions taken in addressing the reports on petty corruption.</p>	<p>Definition: This refers to the percentage of actions taken by ICPC to address complaints and reports submitted by Nigerians via the platform or mechanism that will be created for exposing petty corruption. The actions will be counted as per report or complaint.</p> <p>NB: The reports are core pieces of evidence of corrupt practices via videos, pictures, etc. This is different from the usual petitions.</p> <p>Unit of Measurement: Percentage (Action taken per report/Submitted Reports)</p>	<p>Desk review of platform dedicated for collection of complaints/ corruption reports by Operations and other relevant Depts/Units.</p>	<p>Quarterly</p>	<p>Baseline: New Target: 2024 – 70% Increase by 5 annually</p>	<p>This indicator will address the incessant petty corruption that characterizes our society. The Commission is expected to collaborate with other institutions including security agencies and CSOs in addressing reports of petty corruption captured with evidence. Follow-up action is also required by the Commission for any case reported to other agencies.</p>
<p>Outcome 1.1: Fast-tracking the handling of Petitions and Case Management</p>					
<p>KPI 1.11: No. of new petitions received through ICPC-established channels.</p>	<p>Definition: This is a count of petitions received through ICPC's various channels including ICPC website/emails and phone calls. This will also be a basis for measuring other indicators that rely on petitions.</p> <p>Unit of Measurement: Number</p>	<p>Desk review of records by SSD</p>	<p>Quarterly</p>	<p>Baseline: 2023 – 1,187 Target: 2024 – 1,200 Increase by 50 annually</p>	<p>This indicator seeks to measure the extent to which ICPC is expanding the space and platform for public awareness and participation. It also reflects increasing public confidence in the ICPC.</p>

<p>KPI 1.12: Percentage of petitions that met the standard time for review and response to petitions.</p>	<p>Definition: 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. Unit of Measurement: Percentage</p>	Desk review of records by SSD	Quarterly	<p>Baseline: New Target: 2024 - 91% of standards met 2028 - 95% Increase by 1 annually</p>	<p>This will encourage prompt review of petitions as well as steady feedback on the status of the petitions to the petitioners. This will also boost public confidence on submission of petitions to ICPC.</p>
Outcome 1.2: Improved Investigation and Prosecution of Cases					
<p>KPI 1.21: No. of cases investigated.</p>	<p>Definition: This is a count of corruption cases that were investigated, of which final reports were submitted to the Hon. Chairman or other ACAs. NB: Any investigated case returned for further investigation will not be counted as concluded case; hence, will be removed. Unit of Measurement: Count of investigated cases concluded</p>	Desk review of records by Operations	Quarterly	<p>Baseline: 2023 - 131 Target: 2024- 200 Increase 50 cases annually</p>	<p>This indicator measures the performance of ICPC on its responsibility to effectively conclude cases assigned for investigation. This depends on petitions available for investigation after due vetting of new petitions sent to ICPC.</p>

<p>KPI 1.22: Percentage of investigations resulting to prosecution.</p>	<p>Definition: This refers to the percentage of investigated corrupt cases that resulted to prosecution in court. The data collected in this regard will require confirmation from Legal Services Department. Unit of Measurement: Percentage of investigation to prosecution</p>	<p>Desk review of records by Operations (confirmed by Legal Services)</p>	<p>Quarterly</p>	<p>Baseline: New Target: 2024 - 70% Increase by 2.5 annually</p>	<p>This is a performance measure that will gear ICPC towards efficiency in the investigation of cases. Efforts should be made to ensure that all investigations lead to prosecution.</p>
<p>KPI 1.23: No. of cases filed in court.</p>	<p>Definition: This is a count of corruption cases that were investigated and filed for prosecution in a law court of competent jurisdiction Unit of Measurement: Count of cases filed for prosecution</p>	<p>Desk review of records by Legal Services</p>	<p>Quarterly</p>	<p>Baseline: 2023- 63 Target: 2024 - 80 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. This measure recognises that the judicial system is independent and the ICPC cannot control the efficiency of the judicial process</p>
<p>KPI 1.24: No. of Projects tracked.</p>	<p>Definition: This is a count of projects tracked by ICPC under the Constituency and Executive Projects Tracking Initiative (CEPTI). Unit of Measurement: Number of projects tracked</p>	<p>Desk review of records by Operations</p>	<p>Quarterly</p>	<p>Baseline: 2023 - 1,721 Target: 2024 - 2000 Increase by 50 annually</p>	<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.</p>

<p>KPI 1.25: Duration between receipt of petitions and conclusion of investigations</p>	<p>Definition: This is a computation of the average length of time from the date of receipt of a petition to the date of submission of a final report to the Hon. Chairman from a random sample of cases Unit of Measurement: Number of Days</p>	<p>Desk review of records by SSD and Operations</p>	<p>Bi-Annually</p>	<p>Baseline: New Target: 2024 - 60 days 2028 - 60 days</p>	<p>Through this strategy, ICPC is expected to institute a system for speedy processing and investigation of cases</p>
<p>KPI 1.26: Duration between conclusion of investigations and filing of cases for prosecution</p>	<p>Definition: This is a computation of the average length of time from the date of submission of a final report to the Hon. Chairman to the date of official filing of charges in a law court from a random sample of cases Unit of Measurement: Number of Day</p>	<p>Desk review of records by Legal Services</p>	<p>Bi-Annually</p>	<p>Baseline: New Target: 2024 - 30 days 2028 - 60 days</p>	<p>ICPC is expected to institute a system for speedy processing of filing of investigated cases, of which prima facie has been established</p>
<p>List of Departments/ Units that contribute to the achievement of Outcomes and Objectives as well as their activities</p> <p>Operations, POCD, SSD, LSD and State Offices</p> <ul style="list-style-type: none"> ● Advise on petitions for investigation. ● Drafting of charges in a timely manner and vetting of same for propriety. ● Expeditious arraignment of accused persons in court ● Implement efficient case management systems to track and prioritize cases based on severity and impact. ● Ensure thorough and proper collection of evidence during investigations to build strong cases that can stand up in court. ● Develop effective processes for the transition of cases from investigation to prosecution within the shortest period. ● Develop effective feedback mechanism to boost petitioners' confidence on ICPC. ● Create a comprehensive framework to track constituency and executive projects effectively. ● Utilize advanced tracking tools and software to monitor project progress in real-time. 					

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 2: Reduction of System-Induced Corrupt Practices					
KPI 2.01: No. of MDAs assessed under System Study and Corruption Risk Assessment	<p>Definition: This is the number of MDAs that have been assessed for compliance with the integrity management system under system studies and corruption risk assessment methodologies.</p> <p>Unit of Measurement: Number of MDAs</p>	Desk review of ICPC records	Quarterly	<p>Baseline: 20</p> <p>Target: 2024 - 25 MDAs Increase by 5 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.
KPI2.02: No. of MDAs reviewed for compliance with System Study and Corruption Risk Assessment recommendations.	<p>Definition: This refers to the number of System Reviews conducted on MDAs to evaluate compliance levels with the recommendations of the System Study and CRA earlier conducted.</p> <p>NB: ICPC must set the expected level of progress (in percentage) required of the MDAs to make.</p> <p>Unit of Measurement: Number of MDAs</p>	Desk review of records by SSRD	Quarterly	<p>Baseline: 7 (2021)</p> <p>Target: 2024 - 10 MDAs Increase by 2 yearly</p>	This indicator will help ICPC to pursue a process to support, encourage and if necessary, compel MDAs to comply with the recommendations of system studies and CRAs

Outcome 2.1: Improved Mechanisms for Corruption Prevention					
<p>KPI2.11: Percentage of improvement by MDAs reviewed for compliance with recommendations.</p>	<p>Definition: This refers to the percentage of progress made by MDAs in compliance with the System studies & CRAs Recommendations. NB: ICPC must set the expected progress (in percentage) for the MDAs. Unit of Measurement: Percentage</p>	Desk review of records by SSRD	Quarterly	<p>Baseline: New initiative Target: 2024 – 70% 70% annually</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>KPI2.12: No. of MDAs assessed with Ethics and Integrity Compliance Scorecard</p>	<p>Definition: This is a count of MDAs assessed with the Ethics and Integrity Compliance Scorecard. Unit of Measurement: Number</p>	Desk review of records by SSRD	Quarterly	<p>Baseline: 2023 - 368 Target: 2024 - 220 Increase by 40 yearly</p>	<p>This indicator will help ICPC to assess MDAs with the Ethics and Integrity Compliance Scorecard to ascertain their performance in terms of criteria set on the Scorecard.</p>
<p>KPI2.13: No. of corruption monitoring activities undertaken by ICPC.</p>	<p>Definition: This is a count of corruption monitoring activities including bidding exercises, promotion exercises of MDAs, and election monitoring amongst others. Unit of Measurement: Number</p>	Desk review of ICPC records by ICPC	Quarterly	<p>Baseline: 2023 – 33 Target: 2024 – 20 20% increase yearly</p>	<p>This will entail monitoring of bidding processes in MDAs, promotion, election, and other programmes that might warrant ICPC intervention to ascertain their compliance with the provisions of anti-corruption legislation and regulations.</p>

<p>List of Departments/ Units that contribute to the achievement of the above Objective/ Outcome and Indicator as well as their activities.</p>	<p>SSRD</p> <ul style="list-style-type: none"> ● Increase the number of trained staff dedicated to conducting system studies and corruption risk assessments. ● Employ digital tools and software to facilitate data collection and analysis during assessments. ● Establish a structured follow-up mechanism to review MDAs' compliance with recommendations. ● Maintain detailed records of the compliance status of each MDA and produce regular reports. ● Identify MDAs with low compliance rates and provide targeted interventions to assist them. ● Offer training programs to MDA staff on how to implement and maintain compliance with recommendations. ● Ensure the criteria for the Ethics and Integrity Compliance Scorecard are clear and standardized
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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 3: Effective Mobilization of the Citizenry to Fight Corruption					
<p>KPI 3.11: No. of sensitization sessions conducted by ICPC.</p>	<p>Definition: This refers to the count of sensitization sessions conducted by the Commission. These include workshops, conferences, seminars, and paper presentations.</p> <p>Unit of Measurement: Number</p>	<p>Records of attendance at sessions and on-the-spot survey questionnaires administered</p>	<p>Quarterly</p>	<p>Baseline: 2023 - 841</p> <p>Target: 2024 - 700</p> <p>Increase by 10% yearly</p>	<p>This indicator will help to measure the efforts of the Commission in sensitizing the citizens on the ills of corruption and will be an avenue for the generation of feedback for policy input.</p>
<p>KPI 3.02: No. anti-corruption activities undertaken by ICPC-supported CSO platforms.</p>	<p>Definition: This is a count of independent anti-corruption activities by ICPC's CSO partners which are supported by ICPC. This may include but is not limited to training, workshops, sensitizations, project implementation monitoring, media campaigns for increased accountability, and budget tracking amongst others.</p> <p>Unit of Measurement: Number</p>	<p>Desk review of records of ICPC-Supported CSO platforms by PEED.</p>	<p>Quarterly</p>	<p>Baseline: 2023 - 47</p> <p>Target: 2024 - 67</p> <p>Increase by 20 annually</p>	<p>ICPC is expected to build the capacity of its CSO partners and encourage them to take action to support increased transparency and accountability.</p>

Outcome 3.1: Increased Public Enlightenment and Mass Mobilization against Corruption					
<p>KPI 3.11: No. of individuals reached through ICPC sensitization sessions.</p>	<p>Definition: This refers to the count of people who have attended structured sensitization sessions organized by ICPC. This includes workshops, seminars, inaugurations, etc. Unit of Measurement: Number</p>	Records of attendance at sensitization sessions	Quarterly	<p>Baseline: 2023 – 240,429 Target: 2024 – 250,429 Increase by 10,000 annually</p>	<p>This indicator will help measure the number of individuals reached out by the Commission through its sensitization effort.</p>
<p>KPI 3.12: No. of Hits and feedback on the ICPC website and other communication platforms.</p>	<p>Definition: This is a count of hits, impressions, and visits to the ICPC website and other social media platforms used by ICPC for campaigns and enlightenment. Unit of Measurement: Number</p>	Records of visits to the website, comments, and replies to invitations made through social media platforms	Quarterly	<p>Baseline: 2023 – 8,077,944 hits Target: 2024 – 5 million hits Increase by 1 million annually</p>	<p>This is an indication of the level of public awareness and desire to connect with the Commission. ICPC is expected to leverage this to reach out to the public in the dissemination of its activities and achievements.</p>
<p>KPI 3.13: No. of anti-corruption clubs and Vanguards formed.</p>	<p>Definition: This refers to the number of inaugurations of clubs and Vanguards formed by the Commission in primary/secondary schools and tertiary institutions. This also includes clubs and Vanguards rejuvenated. Unit of Measurement: Number</p>	Desk review of records of activities by PEED	Quarterly	<p>Baseline: 2023 – 177 Target: 2024 – 200 Increase by 25 annually</p>	<p>ICPC will employ this medium to infuse moral ethics of anti-corruption activities to pupils and students at various levels of education.</p>

List of Departments/ Units that contribute to the achievement of the above Objective/ Outcome and Indicator as well as their activities.	<p>PEED, SSRD and State Offices</p> <ul style="list-style-type: none"> Develop an annual plan outlining the number of sensitization sessions to be conducted, including topics and target audiences. Collaborate with community groups, and other stakeholders to organize and host sensitization sessions. Implement a feedback mechanism to evaluate the effectiveness of each session and identify areas for improvement. Utilize a variety of formats for sensitization, such as workshops, seminars, webinars, and public lectures, to reach a wider audience. Track attendance and gather participant information to measure reach and engagement accurately. Foster collaboration and networking among CSOs to share best practices and coordinate activities. Ensure the ICPC website is user-friendly, informative, and regularly updated with relevant content. <p>Partner with schools, colleges, and universities to establish anti-corruption clubs and vanguards.</p>				
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 4: Effective Recovery and Management of Proceeds of Corruption & Other Related Offences					
KPI 4.1.1: Naira value of assets seized/ recovered/ forfeited/ restrained.	<p>Definition: This is the Naira value of all assets forfeited, recovered, seized, and restrained.</p> <p>Unit of Measurement: Naira</p>	Desk review of Operations and FTA records by POCD	Quarterly	<p>Baseline: N67b</p> <p>Target: 2023 – N70b Increase by N5b yearly</p>	This measures Commission's performance on its effort in recovery of illicit funds and assets that are proceeds of corruption.

Outcome 4.1: Improved recovery and management of proceeds of corruption						
KPI 4.11: No of seizures	<p>Definition: This is the total count of assets seized by ICPC in the course of investigations.</p> <p>Unit of Measurement: Number</p>	ICPC records of seized assets.	Quarterly	<p>Baseline: New</p> <p>Target: 2024 – 200</p> <p>Increase by 100 annually</p>	This indicator measures how many times the ICPC has carried out asset seizures.	
KPI 4.12: Value of assets disposed	<p>Definition: This is the total value of naira amount realised from the sales of confiscated and forfeited property or other assets.</p> <p>Unit of Measurement: Naira Value</p>	ICPC records of seized assets.	Quarterly	<p>Baseline: N247 million</p> <p>Target: 2024 – N400m</p> <p>Increase by N50 million annually</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>Operations, POCD, LSD and State Offices</p> <ul style="list-style-type: none"> Enhance asset tracing techniques through training and the use of advanced technology to identify and locate assets related to corruption. Maintain accurate and detailed records of the value of assets seized, recovered, and restrained. Regularly monitor and evaluate the forfeiture process to identify areas for improvement. Conduct more frequent and targeted enforcement activities to identify and seize assets related to corrupt activities. Improve intelligence gathering and analysis to identify opportunities for seizures. 					
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						
KPI 5.01: No. of Institutional Capacity Training for ICPC Staff	<p>Definition: This refers to the number of institutional trainings organized for ICPC staff or attended by ICPC staff for capacity development. The trainings can be sponsored by ICPC or in collaboration with other agencies.</p> <p>Unit of Measurement: Number</p>	Desk review of records of trainings by HR	Quarterly	<p>Baseline: 25</p> <p>Target: 2024 – 40</p> <p>Increase by 10 annually</p>	Efforts should be made by ICPC to ensure that every staff get trained at least once every 2 years.	
KPI 5.02 Annual Staff Scorecard on Management Performance	<p>Definition: 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 all staff of the Commission with exception of Heads of Departments, Units and RACCs.</p> <p>Unit of Measurement: Percentage</p>	Result of Survey Questionnaire conducted by ICPC	Annually	<p>Baseline: 2027 – 80%</p> <p>Target: 2024 – 85%</p> <p>Increase by 1 yearly</p>	This indicator will entail the assessment of management staff by their subordinates.	

Outcome 5.1: Improved IPC Management Effectiveness, Style and Culture					
<p>KPI 5.1.1: Percentage of Audit recommendations adopted.</p>	<p>Definition: This refers to the percentage of External Auditor's recommendations improved upon or adopted by ICPC. It will involve the review of current management letter with the immediate past management letter to assess the improvement in the audit report. Unit of Measurement: Percentage</p>	<p>Audited Financial Statement and Management Reports.</p>	<p>Annually</p>	<p>Baseline: 2023 - 100% Target: 2024 - 2028 100%</p>	<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.</p>
<p>KPI 5.1.2 No. of partnership actions/initiatives with other ACAs and donor partners</p>	<p>Definition: This refers to the number of partnership actions/initiatives with other ACAs and donor partners. This would include collaborations that resulted into concrete action of events, information/intelligence exchanges, collaboration in the use of facilities such as training facilities, peer review mechanisms, collaborated trainings, etc. NB: This does not include meetings, visits, and the likes. Unit of Measurement: Number</p>	<p>Desk review of ECU records</p>	<p>Quarterly</p>	<p>Baseline: 2023 - 21 Target: 2024 - 25 Increase by 1 annually</p>	<p>This indicator will help measure the collaboration and cooperation among ICPC, development partners and other ACAs.</p>

KPI 5.13 No. of individuals trained by ACAN	<p>Definition: This is a number of individuals trained by the training arm of ICPC, Anti-Corruption Academy of Nigeria (ACAN).</p> <p>Unit of Measurement: Number</p>	Desk review of ACAN records	Quarterly	<p>Baseline: 2023 – 2,244</p> <p>Target: 2024 – 2,500</p> <p>Increase by 250 annually</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>PRS, Finance and Accounts, ECU and ACAN</p> <ul style="list-style-type: none"> ● Introduce a more effective, rational and fairer evaluation system to evaluate performance of management. ● Increase emphasis on work quality improvement. ● Promptly address issues raised by External Auditors on Management Report and Audited Financial Statement. ● Consciously take steps to enhance workers' morale, loyalty and commitment through capacity development. ● Provide training for public officers and public. 				

ANNEX 3: ICPC M&E OPERATIONAL PLAN

VISION: A Nigeria Free from all forms of Corruption				
MISSION: To Rid Nigeria of Corruption through Lawful Enforcement and Preventive Measures				
Result Area/Strategy Recommendation	Key Actions (Outline the key steps/actions for implementing this recommendation)	Responsible Dept/ Unit	Timeline	Comments/Implementation Note
Key Objective 1: More Effective Channels and Processing of Petitions, Investigation and Prosecution of Corruption Cases				
Outcome 1.1: Fast-tracking the handling of Petitions and Case Management				
Outputs and Activities:				
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/MICT/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
	1.1.1.2 Undertake and establish mechanisms/platforms to encourage reporting of petty corruption and ensure follow-up action.	ICT, PE&ED, OPERATIONS AND OFFICE OF THE CHAIRMAN		ICPC is expected to leverage on the partnership and collaboration with some security agencies and other institutions to tackle petty corruption through the creation of platforms that will be used to harness evidences and ensure follow-up action.
Output 1.1.2 Strengthened policy and systems to support increased reporting.	1.1.2.1 Review and operationalize procedures for handling of all petitions including internal systems to ensure confidentiality of reporting as well as case tracking	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 Development and implementation of anti-corruption policies, internal controls and programmes to adequately mitigate risks associated with service, products and transaction against corruption vulnerable to exploitation by corrupt PEPs.	Operation SSD POCD		
	1.1.2.4 Implement an in-house Witness Protection Programme to the Board for approval and implementation	Legal Services		

Outcome 1.2: Improved Investigation and Prosecution of Cases

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 timeliness 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 timeliness 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 timeliness 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-ed case.	Operations		
	1.2.4.2 Set targets and timeliness between initiation of investigation and conclusion of investigation and ensure implementation	Operations		
	1.2.4.3 Set targets and timeliness 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 SCJML would be an important step forward in joint work and strengthen the capacity of ICPC
Result Area/Strategy Recommendation	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. Key Actions (Outline the key steps/actions for implementing this recommendation)	Operations/Legal Services 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		
	2.1.3.2 Liaise with OHCSF to introduce Anti Corruption Monitoring Officer Professional Cadre in the Public Service/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		
	2.1.6.8 Coordinate Federal Ministries to carry out mapping to identify areas prone to corruption in the parastatals and agencies under their supervision.	SSRD		
	2.1.6.9 Conduct extensive Anti-corruption Education for Staff of all State MDAs and the Private sectors.	ACAN		
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		

	<p>3.1.1.5 Undertake training of Clerks, Deputy Clerks, Committee Secretaries and other administrative officers in the legislature on strategic anti-corruption support.</p>	ACAN		
	<p>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.</p>	PE&ED/SHART		
	<p>3.1.1.7 Conduct periodic training for civil servants on corruption issues and code of conduct.</p>	ACAN		
	<p>3.1.1.8 Incorporate modules on corruption studies in formal management development programs for civil/public servants.</p>	ACAN		
	<p>3.1.1.9 Conduct integrity training for government officials at State and Local Government levels.</p>	ACAN		
	<p>3.1.1.10 Organize periodic training for media practitioners on effective reportage of the ICPC activities and policies.</p>	PE&ED		
	<p>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.</p>	SSRD/ACAN		
	<p>3.1.1.12 Conduct training on Ethics and integrity for electoral officers and political parties' officers.</p>	PE&ED		
	<p>3.1.1.13 Develop or review of code of ethics of the relevant organizations to align to the National Ethics and Integrity Policy</p>	PE&ED		
	<p>3.1.1.14 Conduct sub-National outreach to sensitize the relevant stakeholder on the outcome of the National Inherent and Residual Risk Assessment Exercise especially as it relates to corruption.</p>	PE&ED		

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 Sensitize 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		
	3.1.2.10 Conduct nationwide outreach to sensitize on the outcome of any national or sector risk assessment or typology studies in relation to corruption.	SSRD		

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) workshop across States and Local Government levels.	PE&ED		
	3.1.3.3 Carry out geo-political Zones launch and presentation of the NEIP.	PEED		
	3.1.3.4 Ensure continuous sensitization of the stakeholders on the Ethics and Integrity Policy.	PEED		
	3.1.3.5 Facilitate the adoption of sexual harassment policy in schools.	PE&ED/ SHART		
	3.1.3.6 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		
	3.1.3.7 Review of Anti-corruption Themes and Course in social studies in primary and secondary schools and general studies at the Tertiary levels respectively to including emerging issues.	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

<p>Output 4.1.1 Enhanced capacity of investigators in tracing, recovery and management of recovered assets.</p>	<p>4.1.1.1 Undertake specialized continuous capacity building for operatives and legal officers on Recovery of proceeds of crime.</p>	<p>POCD/ACAN</p>	
	<p>4.1.1.2 Undertake training of investigators, prosecutors and asset managers on asset forfeiture provisions, procedures and management.</p>	<p>ACAN</p>	
	<p>4.1.1.3 Conduct training on beneficial ownership evidence, assets recovery and management for lawyers, investigators and other relevant officers.</p>	<p>ACAN</p>	
	<p>4.1.1.4 Conduct training for staff on UNCAC framework on the repatriation of stolen assets.</p>	<p>POCD/ACAN</p>	
<p>Output 4.1.2 Assets tracing and recovery technological tools and manual reviewed.</p>	<p>4.1.2.1 Undertake a review of Asset Tracing, Recovery and Management Manual</p>	<p>POCD</p>	
	<p>4.1.2.2 Undertake review of technological tools required for Asset Tracing and Recovery and acquire them.</p>	<p>POCD/Procurement</p>	
	<p>4.1.2.3 Development of standard templates for data collection on proceed of crime.</p>	<p>POCD</p>	
<p>Output 4.1.3 Improved policy, measures and mechanism for assets tracked, recovered and disposed.</p>	<p>4.1.3.1 Develop more measures to restrain, seize, confiscate, recover and repatriate where necessary, proceeds of crime/corruption.</p>	<p>POCD</p>	
	<p>4.1.3.2 Develop mechanism for profiling of suspects, family members and associates for tracking of corruption proceeds and assets.</p>	<p>POCD</p>	

	4.1.3.3 Develop a policy on classification and disposal of perishable assets.	POCD		
	4.1.3.4 Implementation of the Money Laundering Act (2022) and Proceed of Crime Act (2022).	Operation/POCD/ Legal Services		
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

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

Outcome 5.1: Improved ICPC Management Effectiveness, Style, and Culture

<p>Output 5.1.1 More effective and objective systems for employees' performance evaluation</p>	<p>5.1.1.1 Design and automate Performance Management System (PMS) for the Commission. 5.1.1.2 Organize annual performance award for outstanding departments and staff. 5.1.1.3 Increase effectiveness and efficiency through setting clear departmental and individual job descriptions to enhance the achievement of departmental goals.</p>	Admin & HR/CT Admin & HR/PRS Admin & HR/All Departments		
<p>Output 5.1.2 Improved ICPC work quality and reduced bureaucracy.</p>	<p>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. 5.1.2.2 Employ and post officers with requisite skills to the relevant departments. 5.1.1.3 Facilitate the preparation of Annual Work Plan of the strategic and routine activities. 5.1.2.4 Conduct timely staff Confirmation, Promotion and Conversion exercise.</p>	Finance & Accounts Admin & HR PRS Admin & HR		
<p>Output 5.1.3 Developed Systems of "How tos" (Operational Processes, policies & Manuals) for key operational processes; reporting, meetings, etc.</p>	<p>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. 5.1.3.2 Initiate and develop appropriate Standing Orders to guide effective and efficient operations of the Commission.</p>	Admin & HR/All Departments 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 ACAs & LEAs Conduct a capacity needs assessment of their staff.	Admin & HR		
	5.1.4.3 Institutionalize coaching and mentoring programs to ensure continuity.	Admin & HR		
	5.1.4.4 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		
	5.1.4.5 Undertake training of ICPC staff on code of ethics.	Admin & HR		
Output 5.1.5 Enhanced ICT strategy for ICPC to upgrade the Commission's ICT infrastructure and capacity	5.1.4.6 Implement Digital Skills Training to improve digital literacy and skills among employees focusing on new technologies that the organization plans to deploy	ICT		
	5.1.4.7 Undertake rank and cadre based appropriate staff trainings.	Admin & HR		
	5.1.4.8 Facilitate the approval, training and deployment of ICPC Armed Squad.	Office of the Chairman/Office of the Sec./Com.		
	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		
	5.1.6.6 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		

