



# COMPENDIUM

## ACHIEVEMENTS OF FOURTH ICPC BOARD

FEBRUARY 2019 - JUNE 2023





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FEBRUARY 2019 - JUNE 2023

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##### **Independent Corrupt Practices and Other Related Offences Commission**

Compendium achievements of fourth ICPC BOARD 2019 -2023

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#### **Correspondence**

##### **The Chairman**

Independent Corrupt Practices and Other Related Offences Commission  
Plot 802, Constitution Avenue  
Zone A9, Central Area, Abuja  
[www.icpc.gov.ng](http://www.icpc.gov.ng)

The Independent Corrupt Practices and Other Related Offences Commission (ICPC) was established in 2000 by Act No.5 of year 2000. Its mandates include enforcement, prevention, public education and enlightenment.



**HIS EXCELLENCY, BOLA AHMED TINUBU, GCFR**  
President, Commander-in-Chief of the Armed Forces  
Federal Republic of Nigeria



HIS EXCELLENCY, KASHIM SHETTIMA, GCON  
Vice President,  
Federal Republic of Nigeria



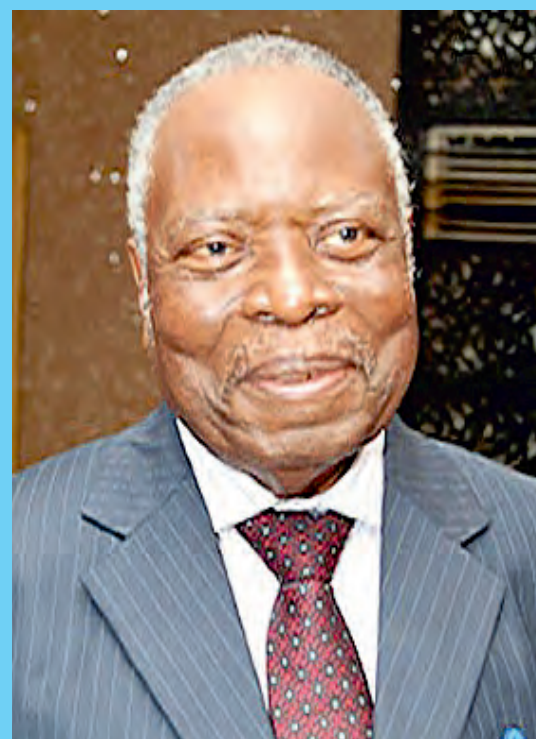
**PROF. BOLAJI OWASANOYE, SAN, OFR**  
Chairman, ICPC



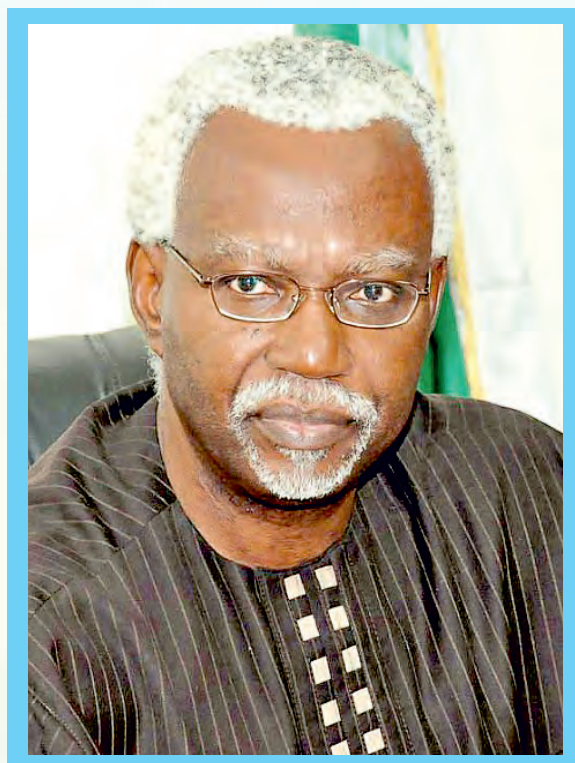
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ICPC Chairman (2000 -2005)



HON. JUSTICE EMMANUEL OLAYINKA  
AYOOLA, CON.  
ICPC Chairman (2005 -2010)



MR. EKPO NTA, Esq.  
ICPC Chairman (2012 -2017)



## 4<sup>th</sup> BOARD



**PROF. BOLAJI OWASANOYE, SAN, OFR**  
**CHAIRMAN**



**JUSTICE ADAMU BELLO (RTD)**  
**MEMBER**



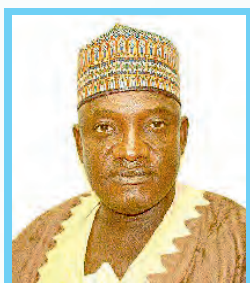
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**SENATOR ANTHONY AGBO**  
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HEAD OF ICT UNIT



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## FOREWORD

**T**he Independent Corrupt Practices and Other Related Offences Commission (ICPC) was established by the enactment of the Corrupt Practices and Other Related Offences Act, 2000, on the 13th of June 2000. Section 6 of the Act encapsulates its core mandate to include: enforcement of the law through the processing of petitions, investigation and prosecution of offenders; corruption prevention through systems study and review with a view to addressing gaps and vulnerabilities that give rise to the vice; and the education and mobilisation of the public for the fight against corruption.

While enforcement serves as deterrence, prevention plays a key role in strengthening government institutions against corruption, and public education and mobilisation ensure that citizens take ownership of the fight to make it more inclusive.

Since its establishment, ICPC had developed two Strategic Action Plan documents (2013-2018 and 2019–2023), which were implemented by the Board and management headed at various times by Hon. Ekpo Nta (2012 – 2015), Hon. Abdullahi Bako (Ag. Chairman from 2015-2017), and Professor Musa Usman Abubakar (Ag. Chairman 2018 – January 2019).

The Fourth Governing Board of the Commission, which was inaugurated on 4<sup>th</sup> February, 2019, approved a new Strategic Action Plan: 2019 – 2023 on 10th April, 2019 to guide it through its tenure. The document provided a five-year strategic framework to guide ICPC in the onerous responsibility of delivering on its mandate as well as to meet the deliverables of the Commission as provided in the National Anti-Corruption Strategy (NACS): 2017–2021 workplan.

Since the implementation of the Strategic Action Plan: 2019 – 2023 under President Muhammadu Buhari Administration, ICPC has recorded giant strides in structural changes in operations of the Federal Government and diminishing corruption in the public sector. Some of these strides include the setting up of the following units and initiatives – Constituency and Executive Projects Tracking Initiative (CEPTI), Asset Tracing, Recovery and Management (ATRM), which later transformed to the Proceeds of Crime Department, Anti-Corruption and Transparency Units (ACTUs) in Ministries, Departments and Agencies (MDAs), Ethics and Integrity Compliance Scorecard (EICS) in Ministries, Departments and Agencies (MDAs), and the National Ethics and Integrity Policy (NEIP), which was approved by the Federal Executive Council (FEC) on 19th August, 2020.

In addition, ICPC has set up a specialised team of investigators and prosecutors known as the Sexual Harassment and Abuse Response Team (SHART) tasked with the responsibility of handling sexual abuse cases. As an intervention to reduce abuse of office or power especially within the education sector, this initiative aims at preventing/eliminating the exploitation of students by unscrupulous lecturers who abuse their positions by demanding sexual gratification from students in exchange for favourable grades. This initiative is supported by Ford Foundation.



The Commission also engaged with stakeholders to prepare draft policies on sexual harassment for educational institutions.

The ICPC Board strengthened its enforcement mandate in the areas of asset recovery and Illicit Financial Flows (IFFs). It became a focal agency for the Common African Position on Asset Recovery (CAPAR) in Nigeria and the Inter-Agency Committee on Stopping Illicit Financial Flows (IFFs). The CAPAR and the Inter-Agency Committee on Stopping IFFs are meant to curb the inimical practices of persons/entities that engage in illicit transfer of capital out of Nigeria to foreign jurisdictions to the detriment of Nigeria and consequential negative impact on development aspirations. Such illicit transfers happen by criminal, corrupt and commercial transactions through tax evasion, trade mis-pricing, transfer pricing, poorly negotiated agreements, profit shifting and use of secrecy jurisdictions and tax havens. These practices negatively impact the economic growth and development aspirations of the nation.

The Fourth ICPC Board carried out massive infrastructural development, constructions and renovation of offices and deployment of modern technologies at the Headquarters and State Offices in spite of slim financial resources.

I must however state that the fight against corruption is our collective responsibility and not the duty of the government or its anti-corruption agencies alone. We must visualise the type of country and environment that we want to live in and bequeath the generations yet unborn. Our immediate objective is to reduce corruption in our lifetime to such an extent that it can no longer threaten our collective well-being, peace and sustainable development.

Therefore, this current Board during its four years period focused on activities that strengthen government's desire to eradicate corruption in revenue and expenditure sides of governance and take development closer to the people by ensuring value for money in execution of publicly funded projects.

Accordingly, this Compendium captures the achievements of the Fourth ICPC Board along its tripartite mandate between February 2019 to June, 2023.

Prof. Bolaji Owasanoye, SAN, OFR  
Chairman, ICPC  
2019 - 2024



## VISION STATEMENT

A Nigeria free from all forms of corruption and corrupt practices



## MISSION STATEMENT

To rid Nigeria of corruption through lawful enforcement and preventive measures

## CORE VALUES

ICPC has a set of fundamental values that support the implementation of the strategy shared by the Board, Management and Staff. It is unequivocally committed to these values in all its interactions. These core values are: Professionalism, Integrity, Dedication and Tenacity, Excellence and Teamwork.

**Professionalism** – Constantly striving to discharge its responsibilities in line with best practices, demonstrating high standards and competencies

**Integrity** – Acting impartially and in public interest, while also being accountable and transparent.

**Dedication and Tenacity** – Working with determination, commitment and efficiency

**Excellence** – Striving for the highest quality based on agreed performance standards

**Teamwork** – Co-operating and complementing one another in the discharge of responsibilities





# EXECUTIVE SUMMARY

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## ATTAINING THE ICPC MANDATE

By the express provisions of Section 6 (a-f) of the Corrupt Practices and Other Related Offences Act No. 5 2000 (ICPC Act), ICPC adopts a holistic approach in combatting corruption through a tripartite mandate of enforcement, prevention and education/public enlightenment (mobilisation).



## ENFORCEMENT MANDATE AND ASSET RECOVERY

### Enforcement mandate:

The enforcement mandate of ICPC empowers it to investigate petitions received and to prosecute cases; where applicable, to recover proceeds of corruption crimes.



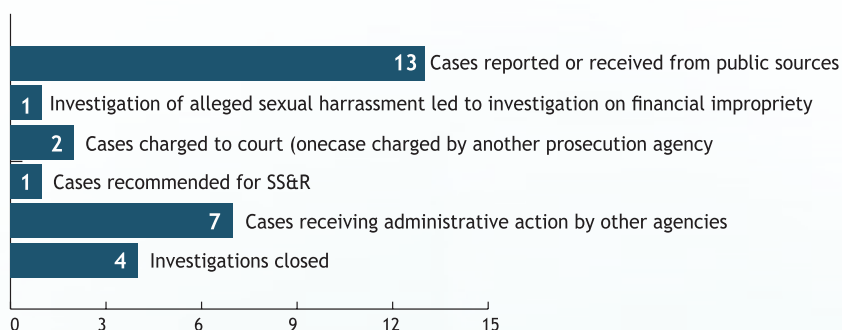


## Petitions, Investigations and Prosecution

YEAR	2019	2020	2021	2022	TOTAL
Petitions received	1,934	1,364	1,393	1,357	6,048
Investigations concluded	1,012	1,079	1,250	1,364	4,705
Cases filed in Court	105	73	67	64	309
Convictions secured	25	26	15	19	85

## Sexual Harassment and Abuse

### Status of Sexual Harassment Cases by ICPC (2019 - 2022)



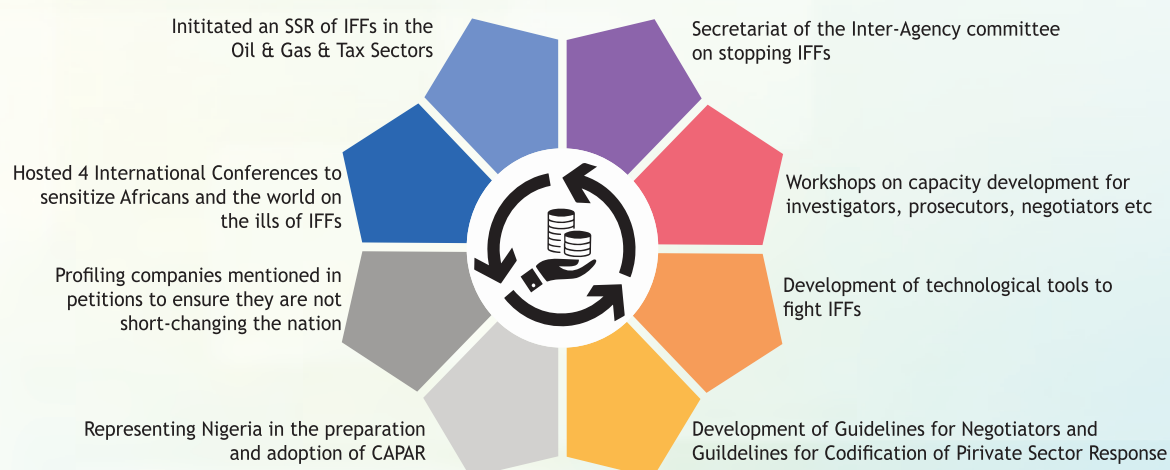
In recognition of the rising incidence of sexual harassment in education institutions, the ICPC Fourth Board with the support of Ford Foundation initiated a project on the problem of sexual harassment that has escalated in society in recent times.

## Tackling Illicit Financial Flows

Illicit Financial Flows (IFFs) are funds illegally earned, transferred or utilised within a country and across international borders. IFFs have affected Nigeria in various ways - through loss of revenue, poor infrastructure and health care, among others.

The Fourth Board recorded many achievements in its bid to address the menace.

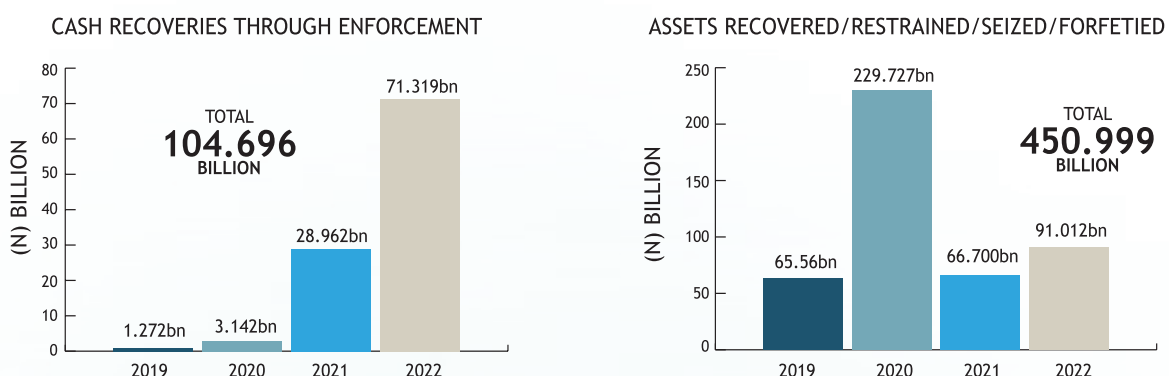
### Achievements on IFFs



## Asset Recovery and Management

Under the Fourth Board, ICPC has strengthened its asset recovery enforcement measure since 2019. In addition, the Proceeds of Crime (Recovery and Management) Act, 2022 introduces innovations in the legal and institutional framework of its recovery mandate.

### Performance of the Commission on Asset Recovery (2019 - 2022)



### Other Assets (2019 - 2022)



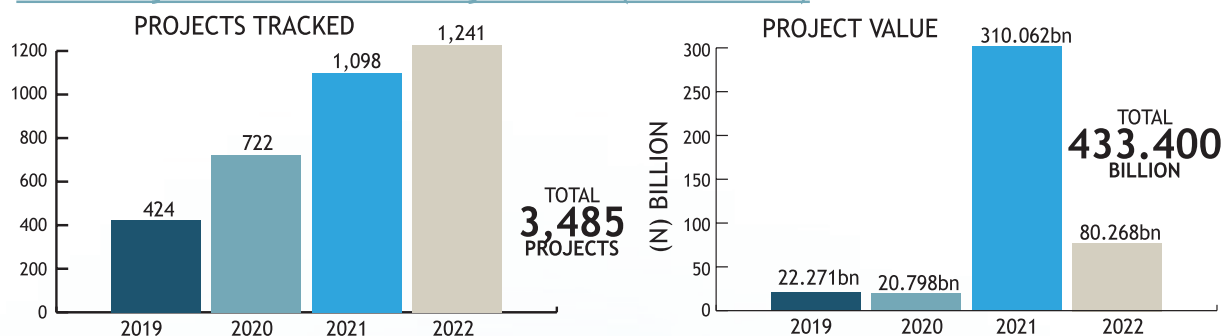
### Constituency and Executive Projects Tracking Initiative (CEPTI)

CEPTI was set up in 2019 to proactively prevent diversion of public funds appropriated for Projects otherwise referred to as Zonal Intervention Projects nominated by legislators.

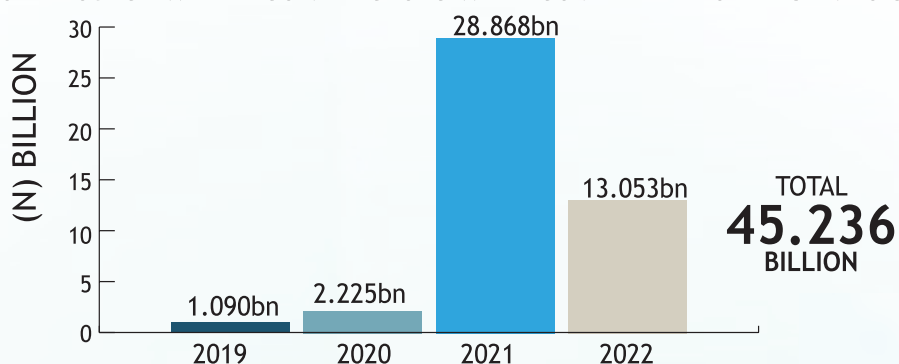


## CONSTITUENCY AND EXECUTIVE PROJECTS TRACKING INITIATIVE

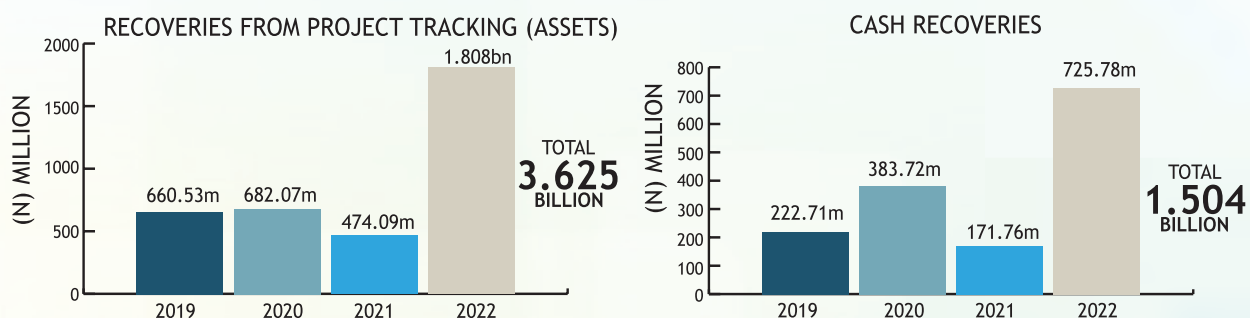
### CEPTI Projects Tracked With Project Value (2019 - 2022)



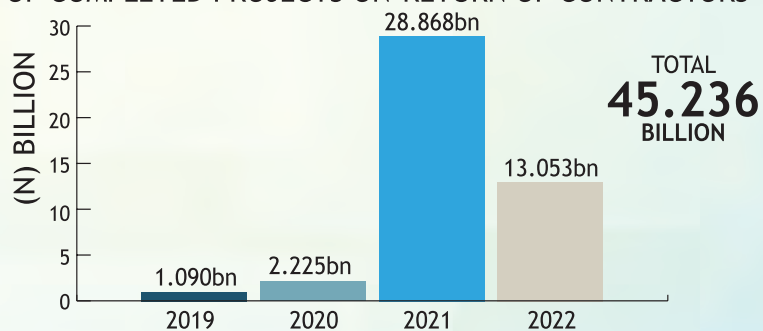
### VALUE OF PROJECT WHERE CONTRACTORS WERE COMPELLED TO RETURN TO SITES



### CEPTI Cash and Asset Recoveries (2019 - 2022)

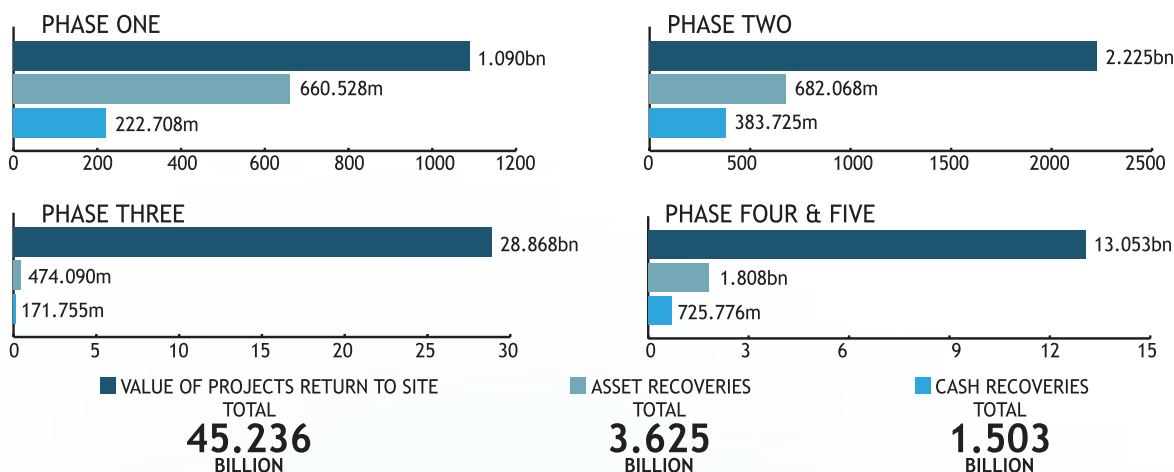


### VALUE OF COMPLETED PROJECTS ON RETURN OF CONTRACTORS TO SITE





### CEPTI Statistics from Phases 1 - 5

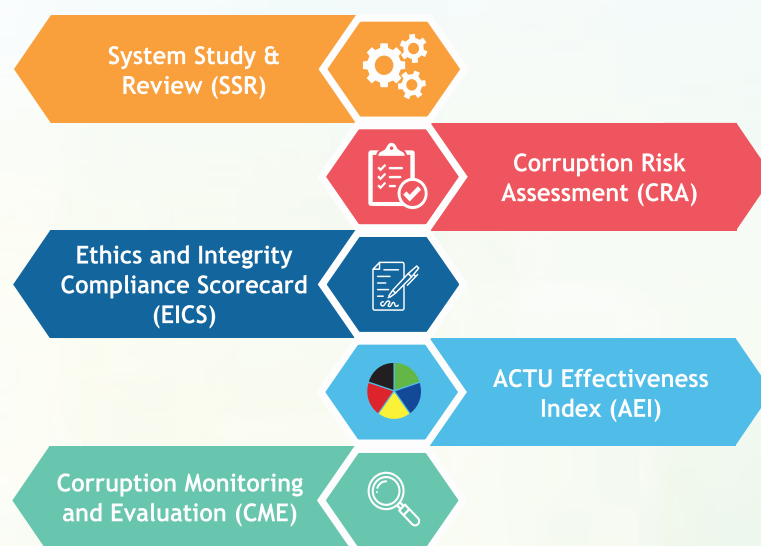


### PREVENTION MANDATE

Section 6 (b – d) of ICPC Act, 2000, provides for the examination and study of systems, procedures and practices that may be permitting corruption. It requires ICPC to direct the skewed practices and to advise government and officials on best practices to prevent corruption.

The tools used to check fraud corruption and other related offences include:

#### Prevention Mandate



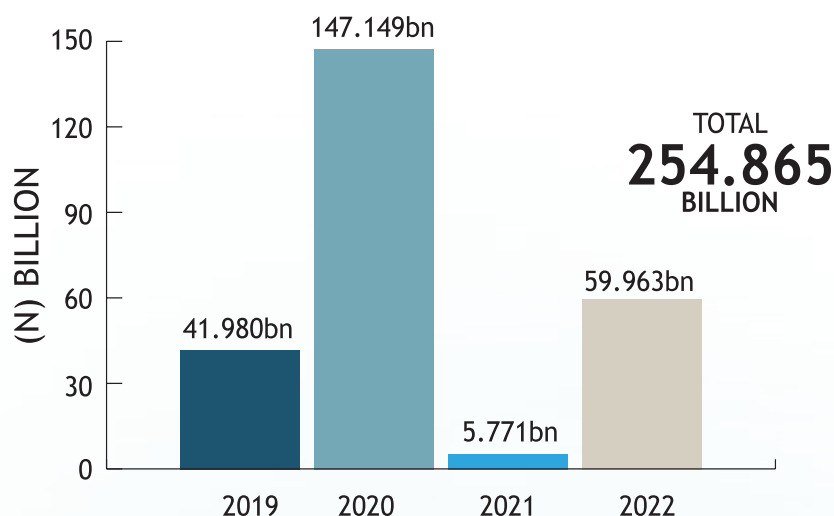
### System Study and Review (SSR)

SSR reviews government systems, operational procedures and practices, and internal controls with a view to identifying vulnerabilities that encourage weak systems and corruption, and draw up guide for correction of identified loopholes to guard against corruption and corrupt practices.



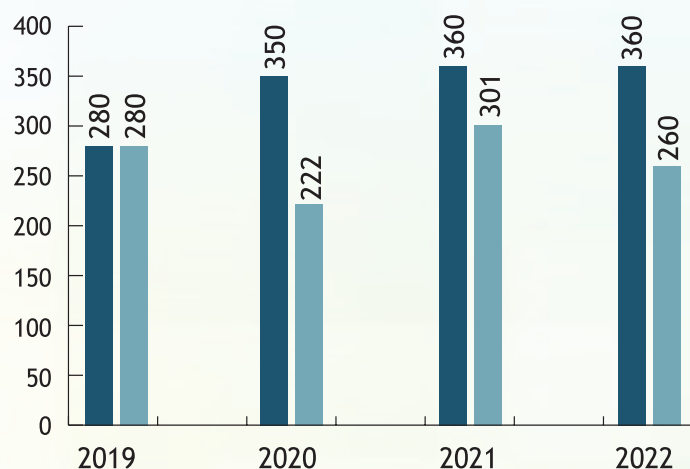
## SYSTEM STUDY AND REVIEW

### Funds restrained through System Study & Review in MDAs and EICS Assessment



## Ethics and Integrity Compliance Scorecard (EICS)

EICS assesses organisational ethics, corporate integrity and fidelity of public systems within the Ministries, Departments and Agencies (MDAs), towards mitigating abuses and corrupt practices and enhancing service delivery in public institutions.

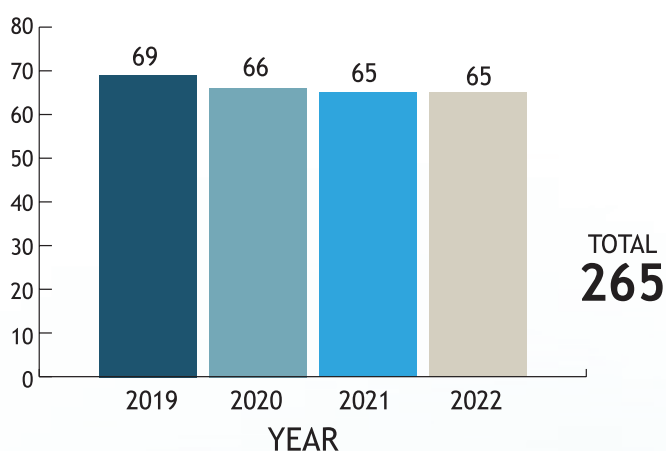


## Corruption Risk Assessment (CRA)

CRA adopts the approach of analysing and estimating the likelihood and impact of forms of corruption on an organisation or sector through careful environmental, organisational/ sectoral and personnel analyses.



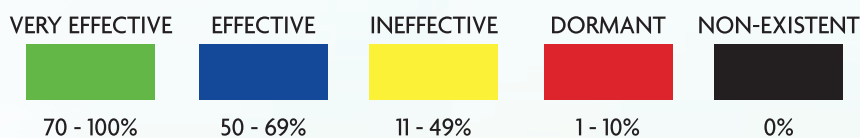
### ACTUs Established in MDAs



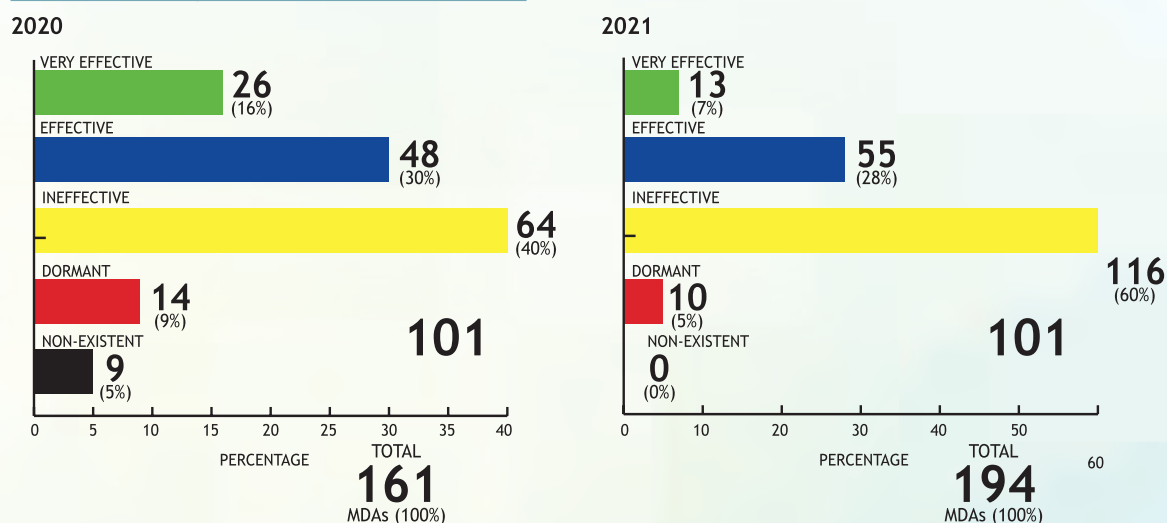
### ACTU Effectiveness Index (AEI)

AEI assesses several elements of ACTU operations. These include: composition of members, inauguration and induction, action plan, office accommodation and facilities, budgets and funding, support by ICPC ACTU Desk officers, impact of organisational support to ACTU, member capacities and sustainability.

#### ACTU Effectiveness Index (AEI) Rating



#### ACTU Efficiency Index for 2020 and 2021



### Policy Advisories

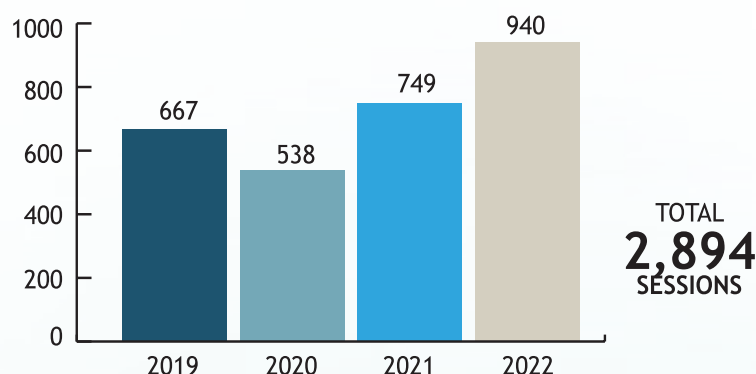
Advisories arising from the Commission's System Studies and Review of the MDAs on personnel cost conducted in 2019, led the Federal Government to issue three treasury circulars to all MDAs as part of measures to curtail abuse and misuse of personnel cost.



## PUBLIC ENLIGHTENMENT AND EDUCATION MANDATE

Section 6 (e – f) of the ICPC Act 2000, mandates it to educate the public on and against bribery, corruption and other related offences and to mobilise public support in combating corruption.

### Sensitization sessions between 2019 - 2022



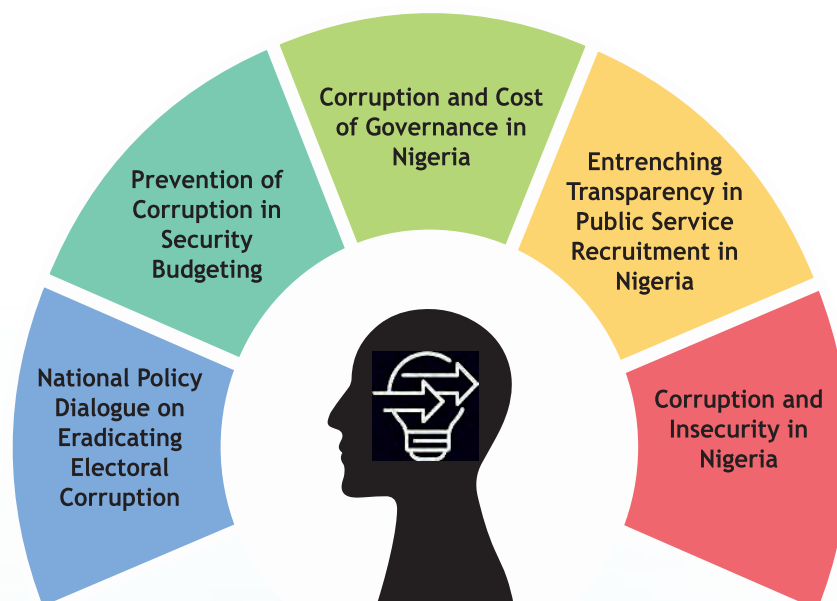
### National Ethics & Integrity Policy (NEIP)

NEIP was approved in August, 2020 by the Federal Executive Council. The Policy obligates all Nigerians and residents to uphold its 7 core values.



### Policy Dialogues

Five policy dialogues were held under the current Board between 2019 and 2022. The dialogues were convened as part of ICPC prevention and public education mandate. The dialogues focused on contemporary issues and areas bedeviled by or prone to corruption. Focus is to elicit solution to contemporary problems.



### Public Enlightenment & Education Activities between 2019 and 2022

S/N	ACTIVITY	2019	2020	2021	2022	TOTAL
A	Sensitization of diverse stakeholders	667	538	749	940	2,894
B	Oversight actions by ICPC supported CSO platforms	85	70	40	75	270
C	Student anti-corruption clubs launched in schools	207	28	47	358	640
D	News Releases and Media Advisory	210	105	193	277	785
E	TV Programme (English and Wazobia) Corruption Must Go	74	91	99	194	458
F	Website Hits and Social Media Feeds	1,101,731	1,818,097	888,222	3,667,232	7,475



ICPC Television Programme - Corruption Must Go



Upgrading of the ICPC Studio



National Summit on Diminishing Corruption in the Public Sector



Public Sector Integrity Award

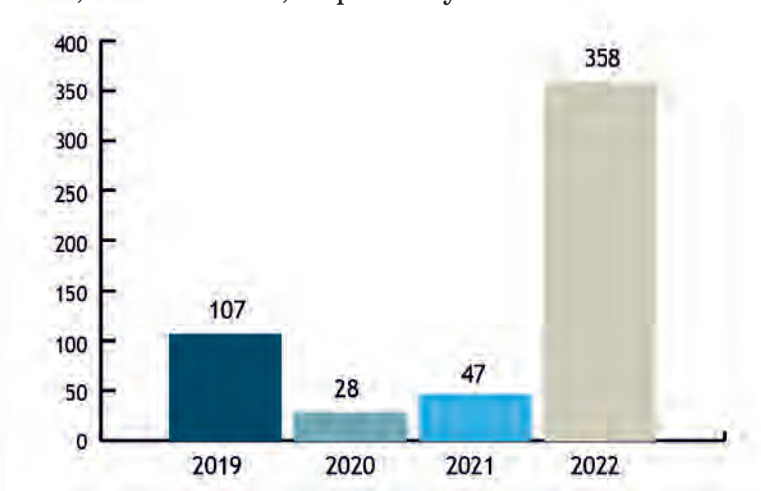


### Earned the Highest Media Editorials in Nigeria

In 2022 ICPC earned a sterling record of 14 favourable editorials triggered by its commitment to anti-corruption crusade and its operational excellence.

### Formation of Anti-Corruption Clubs and Vanguard

The Commission inaugurated anti-corruption clubs and vanguards as follows: 358 in 2022 while 107, 28 and 47 anti-corruption clubs and vanguards were commissioned in 2019, 2020 and 2021, respectively.



### National Values Curriculum (NVC)

ICPC took a step in institutionalising values-based education for Nigeria's youths by developing the NVC and a Teacher's Guide on teaching the curriculum. Elements of the curriculum have been infused into subjects across the various educational levels. The Fourth Board went further to see that subject teachers were trained on the 12 core values of the National Values Curriculum.



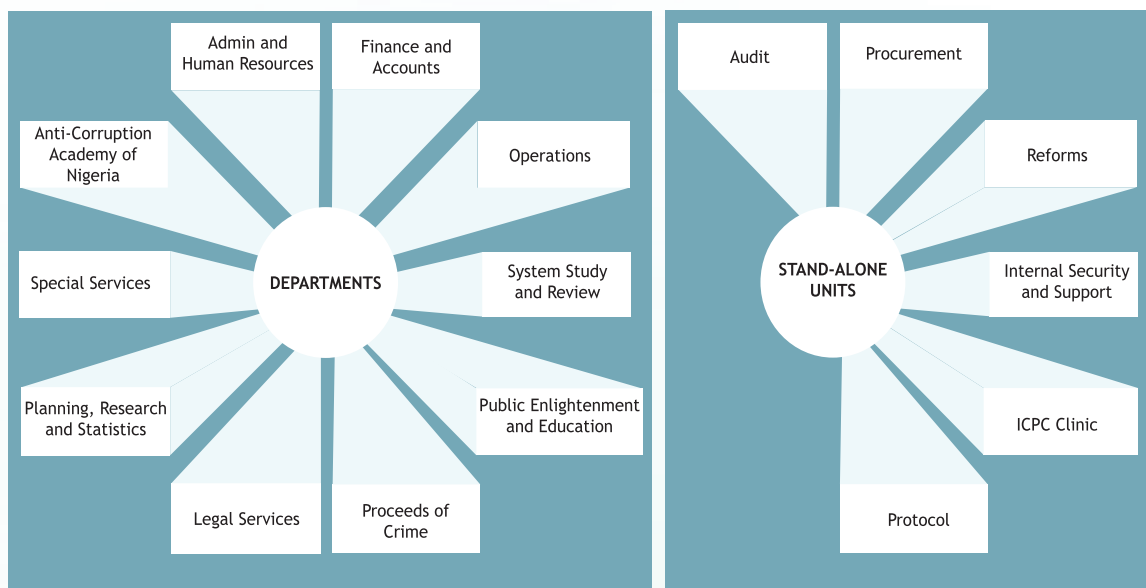


# RESTRUCTURING OF ICPC ADMINISTRATION AND INFRASTRUCTURE DEVELOPMENT

## Restructuring of Administration

In January 2021, the Fourth Governing Board restructured ICPC administration to avoid the “box” nature inherited. The Departments were reduced to 10 (ten) with 10 (ten) Directors and 6 (six) stand-alone Units. For the first time, the Commission produced and approved its Scheme of Service to ensure the effective functioning of the Commission.

### REFORMS AND THE RESTRUCTURING OF THE COMMISSION



## Staff training 2019-2022

The Commission immensely invested in human capital during the four years period of the Fourth Governing Board, including staff training, retraining and development.

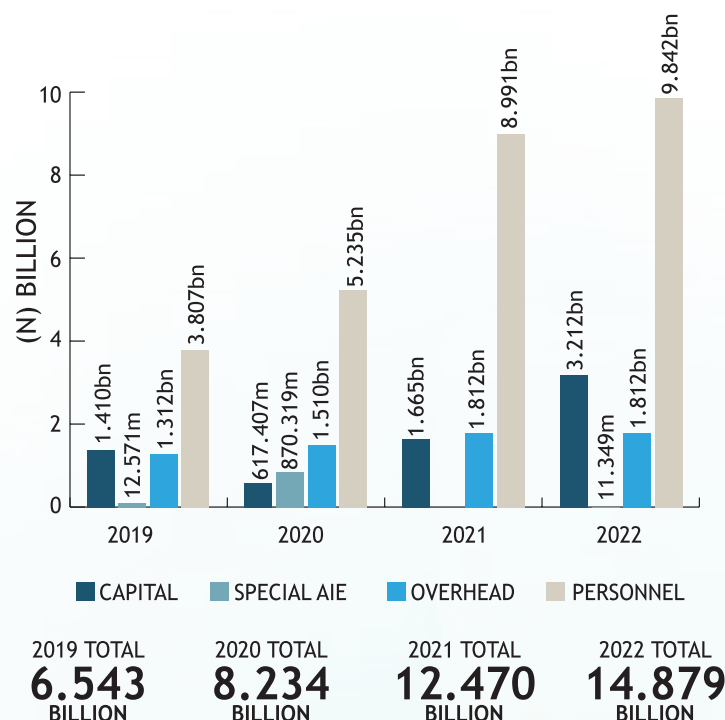




## Improved Funding Appropriation (Releases)

ICPC personnel cost, overhead and capital expenditure have improved significantly.

### Improved Funding Appropriation (Releases)



## Massive Infrastructural Development:

Massive construction and renovation embarked on by the ICPC Board between 2019 and 2022 at the Headquarters and State Offices.

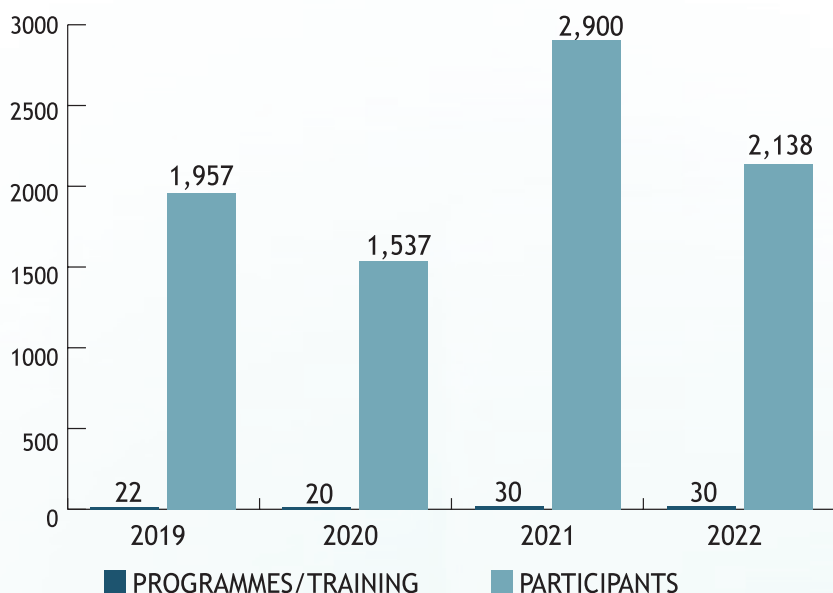
1	Newly Built Prototype Offices in Six States	14	Constructed Iron Bars Access Control
2	Newly Built of ICPC Gate House.	15	Provided Staircase Stainless Iron Handrails for the Entire Main Building
3	Newly Built Special Duties Division.	16	Provided Additional Offices for Staff with Work Stations
4	Newly Built ICT Centre	17	Provided Concrete Interlocking Floor Tiling of Premises of the Headquarters
5	Newly Built Detention Centre	18	Renovated ICPC Offices in Bauchi, Akwa-Ibom and Lagos States
6	Newly Built Transport & Maintenance Workshop	29	Renovated ICPC Board Room
7	Newly Built Detention Facility	20	Renovated ICPC Main Lobby.
8	Newly Built Portakabins	21	Renovated ICPC Headquarters' Auditorium & Provision of Luxury Seats.
9	Newly Built Interview/Interrogation Room	22	Renovated Hon Chairman's Office
10	Newly Built ICPC Perimeter Fence	23	Renovated Offices of 12 ICPC Board Members.
11	Newly Built Modern Forensic Polygraph Lab.	24	Upgraded Fire Fighting System.
12	Provided Access Tarred Road at the ICPC Headquarters	25	Procurement of Medical Lab Equipment for Staff Clinic.
13	Provided Staff Meeting Rooms with furniture.	26	Renovated Integrity Kitchen



## ANTI-CORRUPTION ACADEMY OF NIGERIA (ACAN)

ACAN is the research and training arm of the ICPC with the mandate to build capacity of ICPC staff and other stakeholders, especially public servants on anti-corruption measures and corruption risk assessments.

### ACAN Activities




### ICT/FORENSIC/EDMS ROAD MAP


#### Forensic


<p>Biometric for suspects (palm prints, face, signature &amp; biodata)</p> <p><b>2020</b> COMPLETED</p>	<p>Digital ID Card Printer &amp; biometric for staff of the Commission</p> <p><b>2020</b> COMPLETED</p>
<p>Time and attendance for the staff of head office.</p> <p><b>2020</b> COMPLETED</p>	<p>Polygraph (lie detection for suspects)</p> <p><b>2020</b> COMPLETED</p>
<p>Mobile phone forensic equipment for phones and other hand-held devices</p> <p><b>2020</b> COMPLETED</p>	<p>Optimization of the network installation and configuration of the server in the forensic laboratory</p> <p><b>2020</b> COMPLETED</p>
<p>Time/attendance &amp; biometric capture for suspects at the 15 state offices</p> <p><b>2020</b> COMPLETED</p>	<p>Setting of Lagos State Forensic Lab</p> <p><b>2023</b> COMPLETED</p>
<p>Procurement of more polygraph equipment &amp; establishment of polygraph centre</p> <p><b>2023</b> COMPLETED</p>	<p>Enhancement of document analysis centre</p> <p><b>2023</b> COMPLETED</p>





## Security


 Luggage/body scanners at the reception and entrances **2021**  
COMPLETED

 Access control at the entrance of the Server Room **2021**  
COMPLETED

 Intelligent video surveillance & monitoring at the head office (installation of intelligent cameras at all dark spots in the Commission) **JAN-AUG 2020**  
COMPLETED


 Intelligent video surveillance & monitoring at the interrogation rooms (recording of voice, video & installation of speech to text conversion app) **JAN-AUG 2020**  
COMPLETED


 Deployment of more cameras to cover all the blindspots in the Commission **2023**  
COMPLETED


 Purchase and configuration of surveillance vehicle **2022**  
COMPLETED


 Geolocator **COMPLETED**


## Administration


 Deployment of ICT facilities and tablets to state offices for weekly meetings, webinar & trainings **2020**  
COMPLETED


 Procurement of Smart TV for headquarters and state offices to enhance official meetings, information sharing and capacity building **2020**  
COMPLETED

 Distribution of body worn cameras and investigation tools **2020**  
COMPLETED


 Upgrade of ICT hardware and software at the headquarters & state **2020**  
COMPLETED


 Purchase of desktops and laptops **2020**  
COMPLETED

 Digitization of personnel records from 2000 to date **COMPLETED**


 Digitization of old petitions and records **ON-GOING**


## ICT/EDMS

 LAN optimization at the head office **JAN-MAR 2020**  
COMPLETED

 Upgrade of the Commission's website from 100GB to 500GB **JAN-MAR 2020**  
COMPLETED


 Hosting of the Commission's website and mail servers within Nigeria **2020**  
ON-GOING

 Purchase of EDMS servers **2020**  
ON-GOING

 Application Development Management Workflow Implementation **JAN-MAR 2020**  
COMPLETED

 Application Development E-Archiving solution implementation with integrated Data Analytics features **JAN-MAR 2020**  
COMPLETED

 Network Security optimization at the Commission's Head Office: Deployment of Microsoft Active Directory for domain **JAN-MAR 2020**  
COMPLETED

 Development of video file compression application to reduce storage of footage of interviews conducted during interrogation and to enhance the upload of such videos to the Commission's central server **2020**  
COMPLETED



 Documentation and Trainings: User and IT Administration Training on platform <b>2020</b> COMPLETED	 Implementation of Enterprise Network Security infrastructure to cover the ICPC state offices PENDING
 Implementation of Enterprise Network Disaster Recovery Site for ICPC Headquarters and selected Offices e.g. Lagos ON-GOING	 Documentation and Trainings: User and IT Administration ON-GOING
 Signing of Service Level Agreement with the Consultant <b>2022</b> ON-GOING	 Platform Administration and Support ON-GOING
 Implementation of an active and robust Wi-Fi at the Commission <b>2023</b> COMPLETED	 Power backup solution for the Commission PENDING
 Upgrade of Server Room into standard data centre <b>2023</b> COMPLETED	 Upgrade of bandwidth (upgraded from 1MB to 15MB) <b>2023</b> COMPLETED
 Backup strategy ON-GOING	 Purchase of extra servers and storage accessories for the implementation of backup strategy <b>2022</b> COMPLETED

## PARTNERSHIP & COLLABORATION / AWARDS

ICPC has enhanced its collaborations and partnership strategically in furtherance of its prevention mandate. These partnerships cover local and international partners: such as:

1	The Presidency	21	National Universities Commission (NUC)
2	Office of the Secretary to the Government of the Federation (OSGF).	22	National Board for Technical Education (NBTE).
3	Office of the Head of Civil Service of the Federation (OHCSF).	23	National Orientation Agency (NOA).
4	Office of the National Security Adviser (ONSA).	24	Coalition for Dialogue on Africa (CODA).
5	Federal Ministry of Finance, Budget and National Planning.	25	The Common African Position on Asset Recovery (CAPAR).
6	Office of the Accountant General of the Federation (OAGF).	26	UNODC GloBE Network for Cross-Border Cooperation.on Information & Intelligence Sharing
7	Office of the Auditor General of the Federation (OAuGF).	27	United States Department of Justice.
8	Budget Office of the Federation.	28	Deputy British High Commission.
9	The Service Chiefs of the Federal Republic of Nigeria.	29	National Crime Agency (NCA).
10	Nigeria Police Force (NPF).	30	International Police (INTERPOL).
11	Code of Conduct Bureau (CCB).	31	International Anti-Corruption Academy (IACA).
12	Economic and Financial Crimes Commission (EFCC).	32	Commonwealth Africa Anti-Corruption Centre (CAACC).
13	Nigeria Extractive Industries Transparency Initiative (NEITI).	33	MacArthur Foundation.
14	National Drug Law Enforcement Agency (NDLEA).	34	Ford Foundation.
15	Nigeria Financial Intelligence Unit (NFIU).	35	Network of National Anti-Corruption Institutions.in West Africa
16	Financial Action Task Force (FATF).	36	Federal Road Safety Corps (FRSC).



17	FCT Department of Road Traffic Service (FCT DRTS).	37	West Africa (NACIWA).
18	Federal Inland Revenue Service (FIRS)	38	Association of Africa Anti-Corruption Authorities (AAACA).
19	Independent National Electoral Commission (INEC).	39	British Council.
20	Joint Admission and Matriculation Board (JAMB).		State of Palestine.

## AWARDS AND RECOGNITION

The Chairman of the Commission, Professor Bolaji Owasanoye, SAN, OFR and the ICPC received numerous awards and recognitions at the local and international levels for its outstanding performance in the fight against corruption. The awards include:

1	2022 National Honour Medals.	5	2022 SAEMA Award of Excellence in Public Information Management.
2	2021 SAEMA Diligent Investigation Award	6	2021 NTA Language Channel Award.
3	2021/2022 First Position Award as the Best Website in Nigeria.	7	2021 NIQS Presidential Award of Excellence.
4	2022 Outstanding Achievement in Collective Action Award by the Switzerland-based Basel Institute.		



Former President Muhammadu Buhari and the 4th ICPC Board at the 4th National Summit on Diminishing Corruption in the Public Sector



# ICPC AND THE FIGHT AGAINST CORRUPTION

[www.icpc.gov.ng](http://www.icpc.gov.ng)



## 1.0 ICPC AND THE FIGHT AGAINST CORRUPTION

**C**orruption is a global malaise that has destroyed the fabric of the society or system. The magnitude of its reach in the country is tragically stupendous. All indicators showed that the spread of this cancer had become terrifying. It pervaded private and public institutions and overwhelmed all levels of government.

The price of corruption has been extremely high. The economic, political and social bases of the country have been severely eroded and degraded. It has brought Nigeria near the brink and almost rendered it helpless and hopeless. It therefore became imperative for a drastic change to arrest the rot. This impelled the coming of the Independent Corrupt Practices and Other Related Offences Commission (ICPC).

The enactment of the Corrupt Practices and Other Related Offences Act, 2000 and the coming of ICPC brought a fresh and decisive perspective to the fight against corruption in the form of a holistic approach encompassing enforcement, prevention, education and public mobilisation. While enforcement is directed at sanctioning corrupt individuals, prevention is for overall system change along with an enduring re-orientation of the citizenry.

The Act No.5, 2000 sets up the Commission with wide-ranging powers. The Act brought under its purview all Nigerians, in the private and public sectors and even those public officers with constitutional immunity.

From its establishment, ICPC had four Governing Boards and Chairmen. The pioneer Board was headed by Late Honourable Justice Mustapha Akanbi, CFR, (2000 – 2005); the second Board was led by Honourable Justice Emmanuel Olayinka Ayoola, JSC (rtd), CON, (2000 – 2005); the third was headed by Mr. Ekpo Nta (2012 – 2017); while the fourth and current Board, inaugurated in 2019, is headed by Professor Bolaji Owasanoye, SAN, OFR.

In the order set out in Section 6 of the Act, 2000, the first duty of the Commission is to receive complaints, investigate and prosecute offenders.

Other duties include reviewing and modifying the systems and procedures of public bodies as well as education of the public and fostering their support in combating corruption.

### 1.1 MEMBERSHIP OF THE COMMISSION

As provided for in Section 3(3) of the Act 2000, the ICPC Board consists of a Chairman and twelve (12) Members, two of whom represent each of the six geo-political zones of the country. The membership is drawn from the following categories of Nigerians as spelt out by the Act:

- A retired Police Officer not below the rank of Commissioner of Police;
- A legal practitioner with at least 10 years post-call experience;
- A retired Judge of a superior court of record;



- A retired Public Servant not below the rank of a director;
- A woman;
- A youth not being less than 21 or more than 30 years of age at the time of his or her appointment; and
- A chartered accountant.

There's also a Secretary who is responsible for keeping the records of the Commission and the general administration and control of the Staff.

The Commission is independent in the discharge of its functions under the Act as it is not subject to the direction or control of any person or authority.

## 1.2 FOCUS OF THE COMMISSION

In addition to its duties listed under Section 6 (a-f) of the Act, the Commission is currently focusing on the following activities –

- i. Strengthening government's desire to eradicate corruption in revenue and expenditure;
- ii. Moving development closer to the people by diminishing poverty, and
- iii. Ensuring value for money in the implementation of publicly funded projects, escalating asset recovery, and reducing retail corruption as the everyday experience of ordinary people.

One key initiative of ICPC in ensuring that government gets value in the execution of public projects and improved delivery of social welfare services to Nigerians is the Constituency and Executive Projects Tracking Initiative (CEPTI).

The success of the exercise included the recoveries of tractors, ambulances, dialysis machines and other hospital equipment from sponsors of the projects. Others were the recovery of huge sums of money, hundreds of tricycles, grinding machines, tractors, ambulances and other empowerment items from the project sponsors.

Over 300 contractors who hitherto had abandoned projects were forced by the Commission to return to site to complete them. The value of CEPTI completed projects on return of contractors stood at N45.28 billion.



## 2.0 REFORMS AND THE RESTRUCTURING OF THE COMMISSION

In January 2020, the Fourth Governing Board observed that the Commission needed to be restructured to avoid the “box” nature inherited. As a result, a committee of seven members with a consultant co-opted to assist in restructuring and providing a Scheme of Service for the Commission.

The assignment was concluded and the Board approved the report and adopted it on 21<sup>st</sup> of January, 2021. Sequel to this proposal on the restructuring has been transmitted to Office of the Head of Civil Service of the Federation (OHCSF) for approval.

Some of the major development in the restructuring exercise is that the departments of the Commission have been reduced to nine with Anti-Corruption Academy of Nigeria (ACAN) making 10 with ten directors.

These 10 (ten) departments are:

**TABLE 1.0: DEPARTMENTS IN ICPC**

S/NO	DEPARTMENTS
1	Administration & Human Resources
2	Finance and Accounts
3	Operations
4	System Study and Review
5	Public Enlightenment & Education
6	Proceeds of Crime, Recovery & Management
7	Legal Services
8	Planning, Research and Statistics
9	Special Services
10	Anti-Corruption Academy of Nigeria

**TABLE 1.1: STAND-ALONE UNITS IN ICPC**

S/NO	UNITS
1	Audit
2	Procurement
3	Reforms
4	Internal Security and Support
5	ICPC Clinic
6	Protocol
7	ICT



## 2.1 DEPARTMENTS IN ICPC

Some erstwhile Departments were merged while others were renamed.

The Education and Public Enlightenment Departments were merged to form the Public Enlightenment and Education Department. The new Operations Department subsumed the former Investigation and Special Duties Departments, as well as the former Financial Investigation Unit and the newly created Constituency and Executives Projects Tracking Division. The Computer Security and Forensic Unit, which used to be a stand-alone unit, is now domiciled under Operations Department as a support unit.

The former Planning, Research and Review (PRR) department is renamed as the Planning, Research and Statistics (PRS) Department. The former Corruption Monitoring & Evaluation Department (CMED) is now the Systems Study and Review Department (SSRD), and the Assets Tracing, Recovery and Management Unit, was not only upscaled to a Department but renamed to the Proceeds of Crime, Recovery and Management Department (POCD) in line with the Proceeds of Crime Act 2022.

The former Chairman's Special Unit was also upscaled to a Department, Special Services Department.

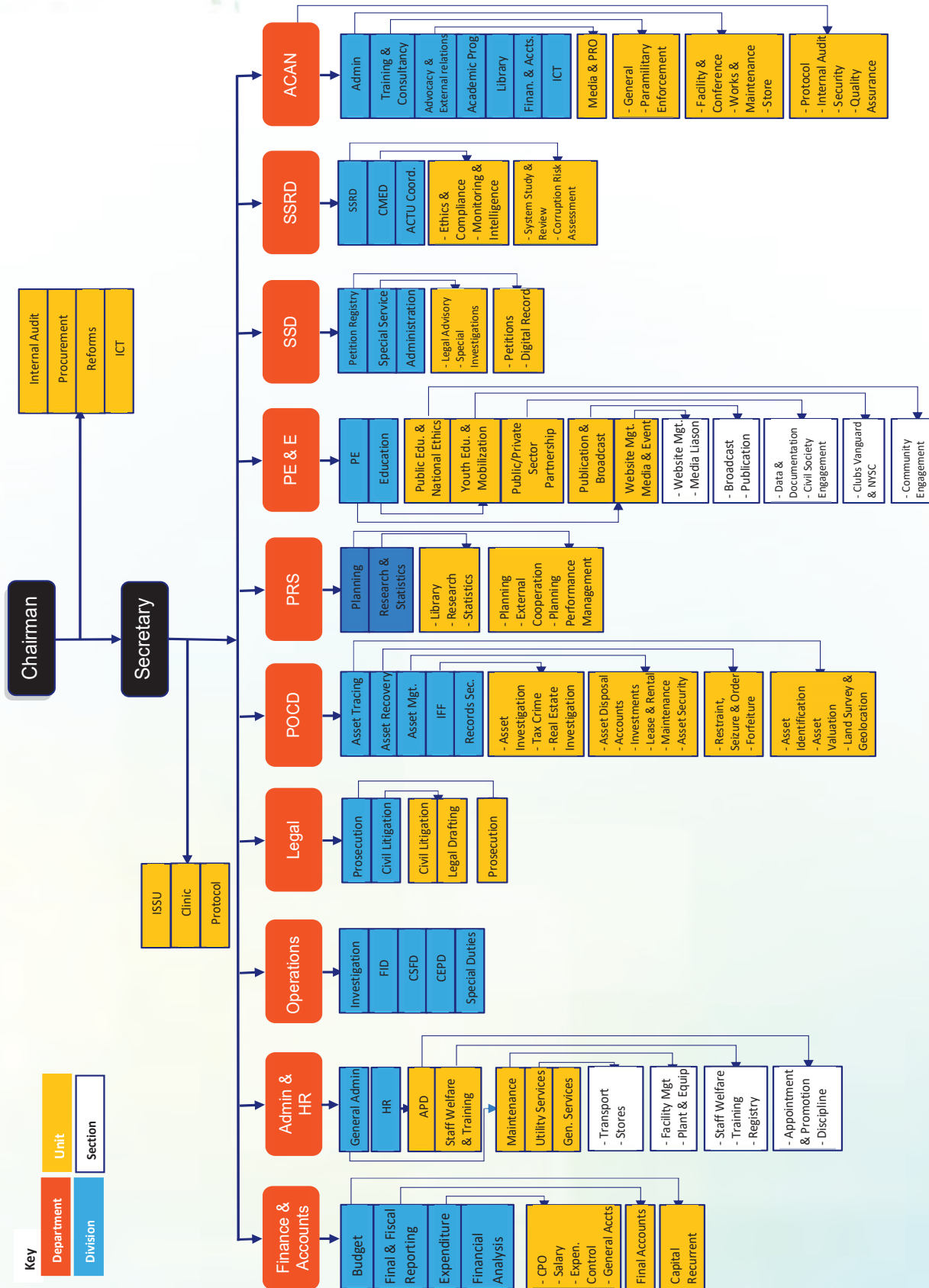
The units in the Commission were streamlined into 7 stand-alone units and these include the Protocol unit, which is to be headed by a staff of the Executive cadre, and the Internal Security and Support Unit (ISSU), both under the office of the Secretary to the Commission. The Clinic is also a unit under the office of the Secretary to the Commission.

The Audit, Procurement, Reforms Units, as well as the newly created ICT Unit, are all under the office of the Chairman.

The reporting format is that for departments, any administrative issues goes to the office of the Secretary to the Commission, while operational issues are to be channeled to the Hon. Chairman.



## 2.2 ICPC ORGANOGRAM



**Key**

- Department
- Division
- Unit
- Section

ICPC ORGANOGRAM



## 2.3 ICPC SCHEME OF SERVICE

A Scheme of Service is an authority document that prescribes guide for recruitments, qualifications and levels of experience required for entry into the service of ICPC, the Fourth Board of the commission has produced and approved one to ensure the effective functioning of the Commission.

The Scheme covers 33 job families/occupational groups graded on the strength of the weight and complexity of work divided into three categories, viz:

- a. Professional Cadre as Superintendent Cadre.
- b. Sub-Professional Cadre as Investigator Cadre.
- c. Assistant Cadre as Anti-Corruption Assistant Cadre.

These are nomenclatures to such that –

- i. Any Bachelor's Degree holder is designated Superintendent ; Diploma holder, Investigator and others as Anti-Corruption Assistant.
- ii. Post, Duties, Salaries and Method of Entry for each post are provided.
- iii. All newly employed are to undergo mandatory training at the Anti-Corruption Academy of Nigeria (ACAN).
- iv. For advancement to management positions, officers are to successfully complete specified courses at the Anti-Corruption Academy of Nigeria (ACAN).
- v. Some of the job families terminate at GL14, and are to be manned by staff of Sub-Professional Cadre e.g., Stores, Protocol, etc.
- vi. Degree and Higher National Diploma have been harmonised only at the entry level, such that they are both employed on GL. 08, but the HND cannot go beyond GL14, save upon attaining additional qualifications.



### 3.0 ATTAINING THE ICPC MANDATE

**B**y the express provisions of Section 6 (a-f) of the Corrupt Practices and Other Related Offences Act 2000, the Commission adopts a holistic approach in combatting corruption, a tripartite mandate of enforcement, prevention and education/public enlightenment (mobilisation). This approach is in tandem with global anti-corruption strategies as contained in the United Nations Convention Against Corruption (UNCAC) to which Nigeria is a signatory.

#### 3.1 ENFORCEMENT MANDATE



The enforcement mandate of ICPC is stated in Section 6a of the Corrupt Practices and Other Related Offences Act, 2000 and gives the Commission powers to investigate petitions received, and to prosecute offenders and where a prima facie case is established. In cases where applicable, the commission also has powers to recover proceeds of crime.

Section 27 (3) of the same Act vested ICPC officers with the power to institute investigation where they suspect that corrupt acts may have taken place. It reads, “Where an officer of the Commission has reasons to suspect the Commission of an offence under this Act following a report made under sub-section (1) or information otherwise received by him, he shall cause investigation to be made and for such purpose may exercise all the powers of investigation provided for under this Act or any other law.”

Enforcement and prosecution received maximum priority of the ICPC Fourth Board on assumption of office in February 2019, resulting in an all-time high number of completed investigations.

#### 3.2 PETITIONS, INVESTIGATIONS & PROSECUTION

ICPC received reports of incidents of corruption in form of petitions, which are processed and assigned for investigation based on the directives of the Commission's



Chairman. It received a total of 6,048 petitions between 2019 to 2022; while 4,705 investigations were concluded during the period.

Records showed that 1,934; 1,364; 1,393 and 1357 petitions were received by the Commission in 2019, 2020, 2021 and 2022, respectively, while investigations concluded were 1,012; 1,079; 1,250 and 1,364 during the same period.

On conclusion of investigations, cases that have merit were forwarded to the Legal Services Department for prosecution. The Legal Department within the period under review filed 309 cases in courts and secured 85 convictions during the four years.

**TABLE 3.0: PETITIONS RECEIVED & INVESTIGATIONS CONCLUDED**

PERIODS	2019	2020	2021	2022	TOTAL
Petitions Received	1934	1364	1393	1357	6048
Investigations Concluded	1012	1079	1250	1364	4705
Cases filed in Courts	105	73	67	64	309
Convictions Secured	25	26	15	19	85

### 3.3 CONSTITUENCY AND EXECUTIVE PROJECTS TRACKING INITIATIVE

One of the novel initiatives of the ICPC Fourth Board is the Constituency and Executive Projects Tracking Initiative (CEPTI). The CEPTI was set up in 2019 to proactively prevent diversion of public funds appropriated for Constituency Projects (otherwise referred to as Zonal Intervention Projects) nominated by legislators.

Prior to the innovation, there had been mounting complaints by citizens over shoddy completion, non-completion or outright non-execution of the constituency and



*ICPC Operatives on Enforcement duties*



executive projects in spite of huge budgetary releases annually by the Federal Government. The key objective of the initiative therefore is to ensure value for money and satisfaction of vital purpose of governance, which is to bring development closer to the grassroots.

In collaboration with relevant government agencies such as Office of Accountant General of the Federation, Budget Office of the Federation, Office of the Auditor General of the Federation, Bureau of Public Procurement (BPP), Nigerian Institute of Quantity Surveyors (NIQS), the civil society and the media, ICPC through the establishment of CEPTI, has enabled cost evaluation and monitoring of constituency and executive projects across the six geopolitical zones of the country. This has curtailed diversion of public funds and reduced the phenomenon of uncompleted or abandoned projects across the country.

The CEPTI is currently in its 5<sup>th</sup> phase and has tracked **3,485** projects valued at **N433,400,754,000.40** between 2019 and June 2023.

The Commission through CEPTI tracked **424** constituency and executive projects across 12 States and the Federal Capital Territory (FCT) in 2019; **722** projects across 16 States in 2020, **1,098** projects across 17 States and the FCT in 2021 and **1,241** projects in 2022.

**TABLE 3.1 CEPTI PROJECT TRACKED WITH PROJECT VALUE (2019 – 2022)**

<b>YEAR</b>	<b>PROJECT TRACKED</b>	<b>PROJECT VALUE</b>	<b>VALUE OF PROJECT WHERE CONTRACTORS WERE COMPELLED TO RETURN TO SITE</b>
<b>2019</b>	424	22,271,198,576.80	1,090,058,702.80
<b>2020</b>	722	20,798,796,116.11	2,225,187,086.78
<b>2021</b>	1,098	310,061,892,687.45	28,868,621,227.55
<b>2022</b>	1,241	80,268,8866,620.38	13,053,092,421.34
<b>TOTAL</b>	<b>3,485</b>	<b>433,400,754,000.40</b>	<b>45,236,959,438.47</b>

Under the CEPTI, ICPC has recovered **N5,129,464,021.75** in cash and assets from 2019 to 2022. Cash recoveries accounted for **N1,503,965,806.88** of the total recoveries while asset recoveries stood at **N3,625,598,214.87**.

Some of the assets recovered from project sponsors include tractors, ambulances, dialysis machines and other hospital equipment, hundreds of tricycles, grinding machines, and empowerment items.

The Constituency and Executives Tracking Projects Initiative resulted in total savings of **N50,366,423,460.09**.



ICPC officers on Constituency Projects Tracking Exercise

**TABLE 3.2 CEPTI CASH AND ASSET RECOVERIES 2019 – 2022**

CEPTI	2019	2020	2021	2022	TOTAL
Projects Tracked Under CEPTI	424	722	1,098	1,241	3,485
Recoveries From Project Tracking (Assets) (N' Million)	660.53	682.07	474.09	1,808.81	3,625.50
Cash Recovery (N' Million)	222.71	383.72	171.76	725.78	1,503.97
Value of Completed Projects on Return of Contractors to Site (N' Billion)	1.090	2.225	28.868	13.053	45.236

One of the notable achievements under CEPTI was the forced return of about 504 contractors to sites to complete abandoned and shoddily done projects by the ICPC.

CEPTI completed projects on return of contractors to sites stood at **N45.236** billion from 2019 to 2022. The breakdown indicates that the contractors on return to site completed **N1.090** billion projects in 2019, **N2.225** billion in 2020, **N28.868** billion in 2021 and **N13.053** billion in 2022.

The tracking exercises of the constituency and executive projects led the Commission to the discovery cases of bribery, signing off projects as completed, false certification of projects, vague description of projects, failure to deduct and remit appropriate taxes,



and projects sited on private property of sponsors.

In line with its enforcement mandate enshrined in ICPC Act 2020, the anti-corruption agency enforced the completion and execution of projects, recovered embezzled monies and assets, enforced distribution of empowerment items to beneficiaries, compelled the return of run-away contractors, and primed several cases for prosecution.

The enforcement action by the Commission significantly led to higher completion rates for funded projects as well as value for money in the national budget.

**TABLE 3.3 CEPTI STATISTICS FROM PHASES 1 - 5**

TRACKING PHASES	VALUE OF PROJECTS RETURN TO SITE N	ASSET RECOVERIES N	CASH RECOVERIES N
PHASE ONE	1,090,058,702.80	660,528,900.50	222,708,614.25
PHASE TWO	2,225,187,086.78	682,068,833.24	383,725,430.11
PHASE THREE	28,868,621,227.55	474,090,679.80	171,755,920.54
PHASE 4 & 5	13,053,092,421.34	1,808,809,801.33	725,775,841.98
<b>TOTAL</b>	<b>45,236,959,438.47</b>	<b>3,625,498,214.87</b>	<b>1,503,965,806.88</b>

### **3.4 THE SEXUAL HARASSMENT AND ABUSE PROJECT - (PREVENTION OF SEXUAL CORRUPTION)**

The issue of Sexual Harassment and Abuse is one that has become of national and indeed international concern in recent times. In recognition of the rising incidence of sexual harassment, abuse and exploitation in education institutions, the ICPC Fourth Board, with the support of a Not-For-Profit Organisation, Ford Foundation, initiated a project on the problem of sexual harassment that has escalated in society in recent times.

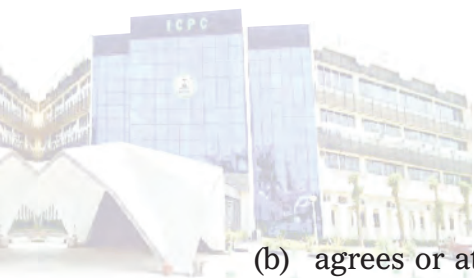
The focus on sexual corruption derived from section 2 (f) and Section 8 of the ICPC Act. Section 2 (f) of the ICPC Act states that gratification includes any service or favour of any description such as penalty or disability incurred or apprehended.”

The project straddles the three focus areas of the Commission's mandate viz-a-viz enforcement, prevention, and public enlightenment and education. The project started with capacity building for investigators and prosecutors of the Commission to enhance their skills in understanding, investigating and prosecution of sexual harassment cases.

Any public officer who uses his office or position to gratify or confer any corrupt or unfair advantage upon himself or any other person has committed an offence under the Act.

Section 8 of the ICPC Act , 2000, further states: Any person who corruptly-

- (a) asks for, receives or obtains any property or benefit of any kind for himself or for any other person; or



(b) agrees or attempts to receive or obtain any property or benefit of any kind for himself or for any other person is guilty of an offence of Official corruption and is liable to imprisonment for seven (7) years.”

Sexual favours fall under the category of “benefit”. When any person in a position of power or authority uses such power irresponsibly by demanding sexual gratification, it is an abuse of power under the ICPC Act. Forms include, lecturer to lecturer, lecturer to administrative staff, lecturer to student or student to student.

### 3.4.1 ESTABLISHMENT OF A RESPONSE TEAM TO DEAL WITH SEXUAL HARASSMENT

In the light of rising scourge of sexual harassment in educational institutions in particular, the ICPC entered into partnership with Ford Foundation on a grant for the “Prevention of Illicit Financial Flows and Sexual Corruption” with the second aspect of the project focusing mainly on Sexual harassment in educational institutions.

The project revealed the need for the Commission to set up a team of officers who would be in charge of cases of sexual harassment reported to the ICPC or which the Commission would handle, by virtue of its mandate. Accordingly, the ICPC constituted the Sexual Harassment and Abuse Response Team (SHART) comprising six officers (two each from Legal, Operations and Public Enlightenment and Education Departments) on the 20th of June, 2022.

The specialised team is tasked with the responsibility of handling sexual harassment cases as an intervention to reduce abuse of office or power.

The “Prevention of Sexual Corruption” project, which is being implemented by the SHART, is designed to strengthen the prevention mandate of the ICPC with focus on prevention of Sexual Harassment in Secondary and Tertiary Institutions in Nigeria in order to address the issue of sexual gratification and abuse of office and power by officials.

#### Basic things to know about Sexual Harassment -

- Physical violence including sexual assault
- Brushing body or object against another
- Demeaning comments on workers appearance, age, and private life
- Sexual comments, stories and jokes
- Sexual advances
- Insults based on gender of the person
- Repeated and unwanted social invitations
- Sending sexually explicit messages
- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, whistling, fondling or inappropriate touching
- Physical, verbal or nonverbal conduct of sexual nature
- Condescending or paternalistic remarks

All these amount to sexual harassment.



ICPC, in furtherance of its enforcement and preventive mandate, has taken a keen interest in issues of abuse of office via sexual harassment as it affects the workplace environment and sexual corruption in educational institutions.

Though the criminal prosecution of sexual harassment is relatively novel in Nigeria, the Commission broke new frontiers in its comprehensive investigation and prosecution in the case of Professor Richard Akindele of Obafemi Awolowo University, Ile-Ife, Osun state. The Commission investigated and prosecuted the matter. The defendant was convicted and sentenced to 24 months in prison for demanding sexual gratification to “pass” a student.

The Commission was able to successfully prove in court that sexual harassment is abuse of power where the perpetrator abuses his position and advantage to demand and at times obtain sexual gratification from the victim. By the case of FRN vs Richard Akindele, the Commission established that mere demand for gratification is an offence, which the agency can and will prosecute. This was a major conviction never seen before in the annals of Nigeria.

With the increase in public awareness of the powers of the ICPC to investigate and prosecute cases of sexual harassment as corruption, more reports on sexual harassment have been received by the Commission. So far, 13 cases have been received during the tenure of the current Fourth Board.

**TABLE 3.4: STATUS OF SEXUAL HARASSMENT CASES BY ICPC – 2019 - 2022**

CASES	NUMBER
Cases reported or received from public sources	13
Ongoing investigations (Investigation of Alleged Sexual Harassment led to Investigation on Financial Impropriety)	1
Cases charged to court (one case charged by another prosecution agency)	2
Cases recommended for System Study and Review (investigation closed by virtue of suspect’s death but recommended for SS & R)	1
Cases receiving administrative action by other agencies	7
Investigations Closed	4

### 3.4.2 PROMOTING SEXUAL HARASSMENT POLICY

By the Sexual Harassment and Abuse Project, ICPC is improving its ability to respond to myriad of cases of sexual harassment via abuse of power especially with regard to educational institutions most notably tertiary and secondary education institutions. This is not to suggest that sexual harassment does not exist in other areas of society, but the situation with educational institutions can be rightly described as epidemic.



Furthermore, ICPC is implementing its prevention mandate by promoting the adoption of sexual harassment policies in educational institutions. The Commission's Sexual Harassment and Abuse Response Team (SHART) participated in the drafting of two model sexual harassment policies to serve as guide for educational institutions from primary to tertiary levels.

The intention is to encourage educational institutions to introduce policies that will guide all stakeholders in their institutions on how to diminish and hopefully prevent sexual harassment, and where it happens how to respond in the interest of all concerned.

The intention of the Commission is not to foist the Model Policies on end-users but to educate stakeholders on the importance of having a sexual harassment policy with a proper framework for preventing and addressing this menace. The expectation of the ICPC is that the model policies will guide and motivate institutions to develop their own policies in a way that responds to all the angles of the case.

The project seeks to encourage psycho-social support for victims of sexual harassment. This is why the Commission's collaboration with civil society and other relevant government agencies established for that purpose is important as they are best positioned to implement this component of the value chain.

Some of the sexual harassment project's activities during the current Board of the Commission include:

- \* Five virtual capacity building for officers of Legal, Operations, and Public Enlightenment & Education Departments on investigation and prosecution of sexual harassment cases.
- \* One hybrid capacity building for new officers on investigation and prosecution of sexual harassment cases with emphasis on victim support.
- \* A two-day virtual engagement with Civil Society Organisations on sexual harassment in educational institutions.
- \* Drafting of a Policy for preventing and addressing sexual harassment in Secondary Schools.
- \* A one-day hybrid Stakeholders Summit and Review of the Draft Policy for Sexual Harassment in Secondary Schools.
- \* Partnering with a civil society organisation to investigate and prosecute a case in a tertiary institution.
- \* Public engagements and interactions (radio programmes) with CSOs and other stakeholders on sexual harassment in Secondary and Tertiary Institutions.
- \* One Twitter Space on sexual harassment





\* National Stakeholders Engagement on Two Model Policies on Sexual Harassment.

### **3.5 ILLICIT FINANCIAL FLOWS PROJECT**

Illicit Financial Flows (IFFs) are illegal movements of money or capital from one country to another for various reasons. IFFs can be defined as funds illegally earned, transferred or utilised within a country and across international borders. It could also be money legally earned but moved wrongfully. Major sources of these funds are proceeds of corruption, theft, bribery, criminal activities, such as drug trafficking, smuggling and commercial activities such as tax evasion, trade mis-invoicing, among others.

The African Union Illicit Financial Flows Report estimates that Africa loses nearly 50 billion dollars annually through profit shifting by multinational corporations and about 20 percent of this figure is from Nigeria alone. IFFs are a major threat to Nigeria's development and achievement of the Sustainable Development Goals or Agenda 2030. The huge resources lost to IFFs are enough to fund public services and initiatives, and other critical investments, revamp the economy, create job opportunities, and alleviate poverty.

IFFs have affected Nigeria in various ways – through loss of revenue, underdevelopment, poor infrastructure and health care, among others. The drain on resources and tax revenues caused by IFFs blocks the expansion of basic social services and infrastructure programmes that are targeted at improving the wellbeing and capacities of all citizens, particularly the very poor. In Nigeria and other developing countries, IFFs mean fewer hospitals, schools, police, roads, and job opportunities.

#### **3.5.1 IFFs AND ICPC QUEST TO FIND SOLUTION**

In its quest to find a lasting solution to this unpleasant phenomenon, the Fourth ICPC Board beamed its search light on areas prone to IFFs such as tax avoidance, tax evasion, base erosion and profit shifting. The Commission initiated a System Study and Review of the IFFs in the Oil & Gas and Tax sectors as well as constituted an IFFs/Tax Fraud Group to address the menace.

The Commission has hosted four international conferences to sensitise Nigerians, Africans and the world on the ills of IFFs and how to collectively work together to stop/combat the menace, in addition to scaling up its operations in profiling all companies mentioned in petitions to the Commission to ensure that they are not in any way short-changing the nation.

Leveraging on two aspects of its three-pronged mandate of prevention and public education, ICPC is re-awakening the consciousness of Nigerians by stimulating dialogues and conversations among critical stakeholders because public awareness is a key tool in fighting against evolving illicit financial operations.



At the international level, the Commission represented Nigeria to initiate and advocate the preparation and eventual adoption of the Common African Position on Asset Recovery (CAPAR) by African Heads of Governments in February 2020 to ensure standards in the tracing, detection, negotiation and eventual recovery of stolen assets from Africa including works of art.

The Chairman of the Commission, Professor Bolaji Owasanoye, SAN, OFR, was a member of the working group that drafted the Common African Position on Asset Recovery (CAPAR), the continent's legal instrument and technical framework for negotiating the return of Africa's assets and funds taken illicitly from the continent and hosted in foreign jurisdictions. The Chairman is also a member of the CAPAR Implementation Group and was a key member of the United Nations High Level Panel on IFFs otherwise known as the FACTI Panel.

The Report of the United Nations High Level Panel on IFFs and its recommendations brought to the fore a major baseline for charting the path in the direction of IFFs for Africa and other developing countries.

The Project IFFs programmes and activities have created awareness, and raised the consciousness of the citizens on their role in tackling the IFFs monster. The nation has also benefitted to a large extent from the robust engagements by the ICPC in remedying the IFFs dilemma.

### **3.5.2 SETTING UP OF INTER-AGENCY COMMITTEE ON STOPPING IFFS**

Former President Muhammadu Buhari approved the establishment of the Inter-Agency Committee on Stopping Illicit Financial Flows (IFFs) and the Committee was inaugurated on 3<sup>rd</sup> May, 2019. The Commission is a member and also serves as the Secretariat of the Inter-Agency Committee.

The establishment of the Committee was a strategic move by the Administration to curb the inimical practices of persons/entities that engage in illicit transfer of capital out of Nigeria to foreign jurisdictions to the detriment of the country's revenue potentials and consequential negative impact on development aspirations. Such illicit transfers happen by criminal, corrupt and commercial transactions through tax evasion, trade mis-pricing, transfer pricing, poorly negotiated agreements, profit shifting and use of secrecy jurisdictions and tax havens, among others. These practices negatively impact the economic growth and development aspirations of the nation.

The Committee was chaired by the Special Adviser to the President on Economic Matters, Dr. Adeyemi Dipeolu, and the members include ICPC, Economic and Financial Crimes Commission, Central Bank of Nigeria (CBN), Nigeria Financial Intelligence Unit (NFIU), Federal Inland Revenue Service, Nigeria Customs Service, National Drug and Law Enforcement Agency (NDLEA), Nigeria Extractive Industry and Transparency Initiative (NEITI), Federal Ministry of Finance, Budget and



National Planning, and Securities and Exchange Commission (SEC). The Committee is tasked with the mission of promoting financial integrity and transparency in consonance with the far-reaching recommendation of the Thabo Mbeki High Level Panel Report on IFFs.

The Inter-Agency Committee (IAC) in conjunction with ICPC and the Ford Foundation has undertaken a range of activities such as research to better appreciate the nature and extent of IFFs in Nigeria including its full extent as well as its incidence in sectors like Oil and Gas, Education, Real Estate as well as taxation, investment and contract negotiation. It has also enabled members to gain a better understanding of illicit financial flows from the perspective of other agencies and to identify areas for potential collaboration.

Workshops on capacity development for investigators, tax inspectors, prosecutors and negotiators of trade, investment, tax and natural resources agreements have also been executed. Efforts at all the engagements have yielded great results and benefits as the Nation through these robust engagements has plugged leakages/loopholes that enable IFFs.

Indeed, actions are at an advanced stage on the development of technological tools to help identify, detect, curb and monitor IFFs. Also, the Guidelines for Negotiators as well as Guidelines for the Codification of Private Sector Response to Stemming IFFs in Nigeria are concluded.

### **3.5.3 MILESTONES ACHIEVED BY INTER-AGENCY COMMITTEE AND ICPC IN TACKLING IFFs**

The pivotal role played by the Inter-Agency Committee with the Collaboration of ICPC and Ford Foundation in organising regional and international conferences, workshops and inspiring dialogues on IFFs and tax evasion have elicited some policy actions by the Nigerian Government as part of measures in addressing the menace.

- i. Aggregated recommendations arising from consultancy reports and the activities executed and forwarded to the Federal Government of Nigeria received positive response leading to the issuance of a circular on 10th March, 2021 by the Hon. Minister of Finance, Budget and National Planning under the caption amongst other items “TAX EXEMPTIONS: MDAs do not have any authority to grant tax exemptions to parties with whom they enter into contracts. Due process, in accordance with relevant statutes, must be followed where any tax exemption is considered justifiable”.
- ii. The same Circular also has another caption “CONTRACTS DENOMINATED IN FOREIGN CURRENCY: MDAs are to ensure that their contracts are wholly denominated in Nigerian Naira (NGN). No MDA is authorised to enter into contract denominated in any foreign currency without the prior approval of the HMFBNP”.
- iii. The Revised Guidelines on Negotiation and Drafting of Contracts and Agreements by Government Parties to Prevent Corruption, Illicit Financial Flows and Ensure Sustainable development has been completed, printed and set for circulation with



the endorsement of the Hon. Minister of Justice and Attorney-General of the Federation.

- iv. The Guidelines for Private Sector Response to IFFs Vulnerabilities in Nigeria has also been developed, printed and set for sensitisation & distribution. The document was endorsed by the Hon. Minister of Finance, Budget and National Planning.
- v. ICPC in collaboration with NITDA is developing an in-house technological solution to IFFs. The development of technological tools to help identify, detect, curb and monitor a local variance of IFFs with a pilot running on Government Home Grown School Feeding Programme almost concluded. The test run of the Technological Solution has been scheduled for the second half of 2023.

Some successes have also been recorded at the regional and international levels since the Report of the African Union High-Level Panel on Illicit Financial Flows (the Mbeki Report) put the matter squarely on the table of global discourse. These include:

- a. The inclusion of IFFs in Sustainable Development Goals, wherein Goal 16 Target 4 calls for significant reduction in IFFs by 2030 as well as the specific mention of the Report and incorporation of IFFs in the Addis Ababa Action Agenda of the Third International Conference on Financing for Development.
- b. Success in advocacy, which however needs to be matched by additional research to deepen understanding of the phenomenon of IFFs and things that facilitate such flows such as the growing digital economy, financial secrecy jurisdictions and unequal contracts.
- c. Of equal importance are the policy actions to stem IFFs at domestic and international levels. One key recommendation arising from the Report of the High-Level Panel on Stopping Illicit Financial Flows from Africa is that African States should create methods and mechanisms for information sharing and coordination among the various institutions and agencies for government responsible for preventing IFFs. This recommendation is being implemented by the continent.

### **3.6 FINANCIAL INVESTIGATION SECTION**

The Commission had in 2007 set up a Financial Investigation Section (FIS) under the Finance and Accounts Department to render financial analytics and services to the investigation departments and units, particularly in cases where complex financial transactions were involved. The FIS was also responsible for organising and overseeing System Study Review of Personnel Cost of MDAs to curb abuses inherent in personnel cost. The section also superintended the financial review of Universal Basic Education Commission and State Universal Education Boards.

The successes of the FIS resulted in the granting it the status of a stand-alone investigating Unit, Financial Investigation Unit (FIU) in 2009. FIU specialised in investigating tax matters, cases involving financial institutions, pension matters,



procurement fraud and complex financial cases. This Unit was later moved to the Operations Department as a Division (Financial Investigation Division – FID) in January 2021.

Financial investigation has helped the Commission in identifying assets acquired as proceeds of corruption. The Division has been instrumental in the recovery of cash stolen and hidden in bank accounts. These monies were disguised as advances to “Project Accountants”, and in most cases paid from capital development accounts of MDAs to individual accounts of staff. While the payment vouchers indicated a specific purpose for the advance such as duty tour allowance, training and capacity building, estacode allowance and airfare, and monitoring and evaluation, analysis of the individual accounts of the so-called project accountants proved different.

In some cases, there were structured cash withdrawals below the threshold requiring banks to file a suspicious transaction report (STR) to the Nigerian Financial Intelligence Unit (NFIU). Further investigation revealed that some of monies ended up in bank accounts of Bureau de Change, limited liability companies, farms and other companies whose mandate had no relationship with the purpose for which the fund was released initially.

Late 2019 and early 2020, the Commission recovered over a billion naira from these project accounts thus saving the money from abuse, misappropriation and outright embezzlement.



Surveillance Room



## **4.0 ASSET (PROCEEDS OF CRIME) RECOVERY AND MANAGEMENT**

Asset recovery is a powerful tool in the fight against local and international corruption and it remains very high on the global agenda, in addition to the continued attention of the United Nations General Assembly. It was included in the Sustainable Development Goals under Goal 16.4 and in the continent of Africa, under the Addis Ababa Action Agenda on Financing for Development.

In line with its mandate, the ICPC Fourth Board has strengthened the Commission's asset recovery measures since 2019. Assets were recovered by seizures during investigations some of which were unchallenged and ultimately reverted to the Federal Government of Nigeria or the victim.

Other routes are recoveries by interim and final forfeiture. As is widely known, assets under interim forfeiture may be finally returned to suspect by the courts therefore, the FGN can only claim assets under final forfeiture.

Furthermore, the law allows return of assets to victims of crime. Some of the victims of recoveries made by the Commission are individuals, commercial entities with government interest, sub-nationals or foreign entities or nationals. Once recovered assets are free of legal encumbrances, they are returned to the Government or the victim, as the case may be.

Prior to the signing of the Proceeds of Crime (Recovery and Management) Act 2022, the Commission implemented a template for efficiently managing frozen, seized and confiscated assets and, where necessary, disposing of such assets through the Asset Tracing, Recovery and Management (ATRM) Department.

The asset recovery template was a promising strategy against graft, embezzlement of public funds and corruption. It involved freezing, confiscation, mutual legal assistance and repatriation of assets.

To emphasise the significance of asset recovery, the Commission in 2020 produced a standard guideline called Asset Recovery and Management Manual (ICPC Policy No. 8, 2020).

The objectives of the Manual among others were to enhance professionalism and ensure standardization of the asset recovery process. The Asset Recovery and Management Manual stipulated that recovery commences from the location and seizure of stolen asset.

### **4.1 PROCEEDS OF CRIME (RECOVERY AND MANAGEMENT) ACT 2022**

Former President Muhammadu Buhari signed the Proceeds of Crime (Recovery and Management) Bill, 2022 (POCA 2022) on 12<sup>th</sup> May, 2022. POCA 2022 introduces raft



innovations in the legal and institutional framework for detecting, recovering, and managing proceeds of crime.

The new law provided for effective strategies and legal mechanisms for not only recovery of stolen assets but also the management of proceeds of crime, benefits derived therein, instrumentality of unlawful activities, and unclaimed properties reasonably suspected to be proceeds of crime. The Act also ensures the management, handover or disposal of properties forfeited to the Federal Republic of Nigeria, in addition to making provisions for non-conviction-based procedure for the recovery of proceeds of crime.

With the President's assent to the Proceed of Crime (Recovery and Management) Bill, 2022, the Commission undertook the following steps in compliance with the Act –

- \* Changed the nomenclature of the erstwhile Asset Tracing, Recovery and Management (ATRM) Department to Proceeds of Crime Department (POCD) and created two Divisions in line with Section 3 (b) of POCA.
- \* The newly created Department has taken over and assumed responsibility for the proper and effective management of recovered assets.
- \* Established and maintained a central database of all recovered assets, asset managers, auctioneers and other necessary support services.
- \* Given notices of restraint orders, pursuant to Section 39 of POCA, to all persons that may be affected by the order and any other person who may be affected by an order to seize/freeze any property in furtherance of the restraint order.
- \* Opened and maintained the Confiscated and Forfeited Properties Account with the Central Bank of Nigeria where the proceeds of sale, management or other forms of disposal of forfeited assets are to be deposited in line with Section 68 of the Act.
- \* Advertised for the lease of some assets that are regarded as a business entity or a going concern.
- \* Maintained statistics as to the amounts recovered and managed.
- \* Created an asset documentation and central registry for all seized and forfeited assets.
- \* Developed a well-designed and approved Asset Disposal Guidelines which are standards to be applied in the disposal of forfeited assets.
- \* Set up an Asset Disposal Committee for the disposal of forfeited assets which includes representatives of the Bureau of Public Procurement (BPP), Civil Society Organisations, Nigerian Union of Journalists and Nigerian Labour Congress, among others.



- \* Returned seized property to the owner where the restrain order is vacated by the Court pursuant to Section 65 of POCA.
- \* Capital valuation of all seized and forfeited assets by professionals which are based on the market value of the properties.
- \* Rental valuation of all properties that are up for rent/lease.

## 4.2 PERFORMANCE OF THE COMMISSION ON ASSET RECOVERY

Within its mandates of Enforcement, Prevention, and Public Enlightenment & Education, the Commission has recorded a number of great achievements in different key sectors of the economy including transport, education, health, the e-government system asset recovery, among others.

The Commission recovered over **N450.997 billion** worth of assets (both cash and physical assets) through its enforcement mandate between 2019 and 2022. The figure represents proceeds of crime seized, restrained and recovered by interim or final forfeiture during the four years period under review.

The Commission achieved the highest figure of assets recovery, seizure and forfeiture of N229.727 billion in 2020 while assets valued at N63.56 billion, N66.70 billion and N91.012 billion were recovered, restrained, seized and forfeited in 2019, 2021 and 2022, respectively.

Funds restrained through the System Studies in MDAs and ICPC advisory accounted for N254.865 billion of the total assets recovered, restrained, seized and forfeited between 2019 and 2022, while the intervention by the Commission through investigations accounted for N67.236 billion of the total assets recovered.

The Commission's enforcement activities further resulted in the completion of **N45.280 billion** projects under the Constituency and Executive Projects Tracking Initiative (CEPTI) which were hitherto abandoned by 450 contractors that were forced by the Commission to return to sites.



*Auctioning of Proceeds of Crime*







**TABLE 4:0 SCHEDULE OF SEIZED AND FORFEITED ASSETS FROM 2019 TO 2022**

SEIZED AND FORFEITED ASSETS	2019	2020	2021	2022	TOTAL
	N	N	N	N	N
Cash Recoveries Through Enforcement	1,272,766,741.27	3,142,161,050.70	28,962,347,808.28	71,319,307,773.26	104,696,583,373.5
Assets Recovered/Restrained/Seized/Forfeited	63.56 billion	229.727 billion	66.700 billion	91.012 billion	450.997 billion
<b>Other Assets</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>	<b>TOTAL</b>
Vehicles	18	20	13	16	67
Land	51	26	6	20	103
Buildings	275	60	31	324	690
Businesses	2	19	13	0	34
Farms	1	2	5	0	8
Jewelries	0	12	1	67	80
Electronics	0	0	7	12	19
Clothings, Bags and other Accessories	0	0	75	20	95
<b>TOTAL</b>	<b>347</b>	<b>139</b>	<b>151</b>	<b>459</b>	<b>1,096</b>

The Commission realised N207.25 million being proceeds from assets disposed in September 2022 following the signing into law of the Proceed of Crime (Recovery and Management) Bill, 2022 (POCA 2022).

A total of 1,096 other assets comprising 690 buildings, 103 land, 95 articles of clothing, bags and other accessories, 80 jewelries, 67 vehicles, 34 businesses, and 8 farms were also recovered, seized and forfeited in four years.



## 5.0 PREVENTION MANDATE

One peculiar aspect of the ICPC Establishment Act, a legislation which predates the United Nations Convention Against Corruption 2003, is the patent provisions on preventive measures against corruption.

Though Section 6 (a) of the Corrupt Practices and Other Related Offences Act provides for enforcement – investigation and prosecution of suspected and substantiated reports of corruption, Section 6 (b – d) provides for the examination and study of practices, systems, procedures of public bodies and where, in the opinion of the Commission, the practices, systems and procedures seem to aid and facilitate fraud or corruption, to direct and supervise a review of them.

The Commission employs this provision as authority to identify and detoxify crooked public systems and procedures with advisories to relevant and concerned public agencies and officials realising that these weak systems are cesspools for corruption.

The tools used to implement this section of the Act include System Study and Review (SSR), Corruption Risk Assessment (CRA), Ethics and Integrity Compliance Scorecard (EICS), ACTU Effectiveness Index (AEI) and Corruption Monitoring and Evaluation (CME), among others. These tools have become the keystones of the Commission's operations, thus enabling it to check fraud and theft of public funds, and reduce the opacity and shaded practices as public systems are opened up for public scrutiny.

Under the ICPC Fourth Board, a new department known as Systems Study and Review Department (SSRD) was created in December 2020. The new department absorbed the systems study and review (SSR) and corruption risk assessment (CRA) functions of the former Planning, Research and Review (PRR) Department, and the corruption monitoring and evaluation function of the former Corruption Monitoring and Evaluation Department (CMED).

The Department is structured into two divisions: Systems Study and Review and Corruption Monitoring and Evaluation overseen by the Board's Sub-Committee on Prevention.

### 5.1 SYSTEMS STUDY AND REVIEW

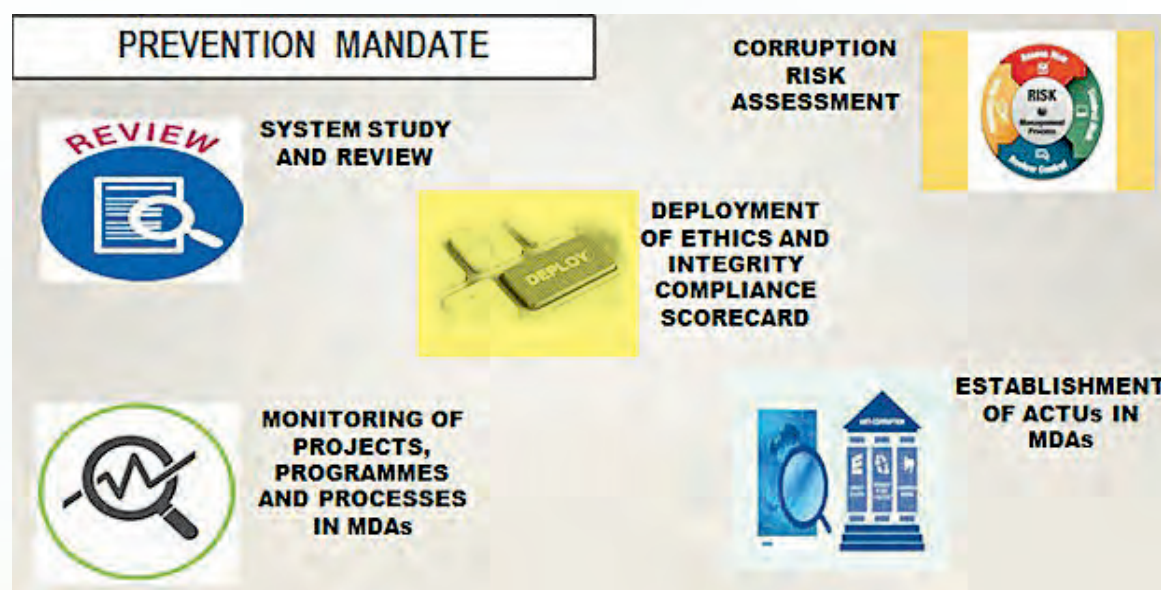
The aim of a System Study and Review (SSR) exercise is to review government systems, operational procedures and practices, and internal controls with a view to identifying vulnerabilities that encourage weak systems and corruption and draw up guidelines for the correction of identified loopholes to guard against corruption and corrupt practices.

A total of 71 SSR exercises were conducted on MDAs under the 4<sup>th</sup> Board. Five (5) SSRs were conducted in 2019 (with 2 post-review checks), and 6 in 2020. In 2021, 20 MDAs were assessed with 5 finalized from 2020 and in 2022, 40 systems studies were

conducted.

In addition to the above, the Commission reviewed 426 MDAs based on their personnel costs and 365 MDAs on the Open Treasury Portal for compliance with Government Integrated Financial Management Information System (GIFMIS) and Treasury Single Account (TSA). The exercise saved the government **N254.865 billion** from Personnel, Overheads and Capital Costs of MDAs between 2019 and 2022 as the Commission through system studies restrained **N41.98 billion** in 2019, **N147.14 billion** in 2020, **N5.77 billion** in 2021 and **N59.96 billion** in 2022.

These reviews of the Open Treasury Portal and personnel and capital budget utilisation of MDAs are done in collaboration with the Auditor General of the Federation.



The system studies have however been quite revealing. They have indicated systemic dysfunction, inadvertent breaches of regulations, ignorance of proper procedures, and sometimes, willful violation of laid down rules of doing government business by public officials.

In addition, the Commission found the following violations during the system study and review of MDAs. These include:

- Non-remittance of tax and other statutory deductions,
- Discrepancies on utilization of Internally Generated Revenue (IGR),
- Procurement and contract fraud/abuse of due process in procurement,
- Abuse of recruitment process,
- Abandonment of procured items resulting in waste of government resources,
- Abuse of due process by scholarship awarding agencies,
- System Study report revealed that 15.3% of companies awarded contracts at Presidential Amnesty Programme were not found on the CAC register of companies. These unregistered companies were awarded contracts worth the sum of N15,361,832,275.24 (Fifteen billion, Three hundred and sixty-one million, Eight



hundred and thirty-two thousand, Two hundred and Seventy-five-naira, Twenty-four kobo) while 10% taxes (WHT and VAT) amounting to N15,361,832.28 were not paid.

The Commission through carrying out its prevention mandate has succeeded in reducing the phenomenon of abuse of budget by padding and inclusion of ghost workers. Several advisories have led to circulars issued by government to achieve structural changes in operations of government such as improvements in MDAs' utilization of budget, better value for money, improved project completion, service delivery and anti-corruption awareness generally.

The efforts of the ICPC have positively impacted on the selection, implementation, monitoring and evaluation of projects by the government.

## 5.2 ETHICS AND INTEGRITY COMPLIANCE SCORECARD

The Commission in collaboration with development partners - Justice for All (J4A)/DFID developed the Ethics and Integrity Compliance Scorecard (EICS) in 2015 as an essential tool designed to discover institutional weaknesses that promote corruption in public institutions. The EICS assesses the organizational ethics, corporate integrity and fidelity of public systems within MDAs, towards mitigating abuses and corrupt practices and enhancing service delivery in public institutions.

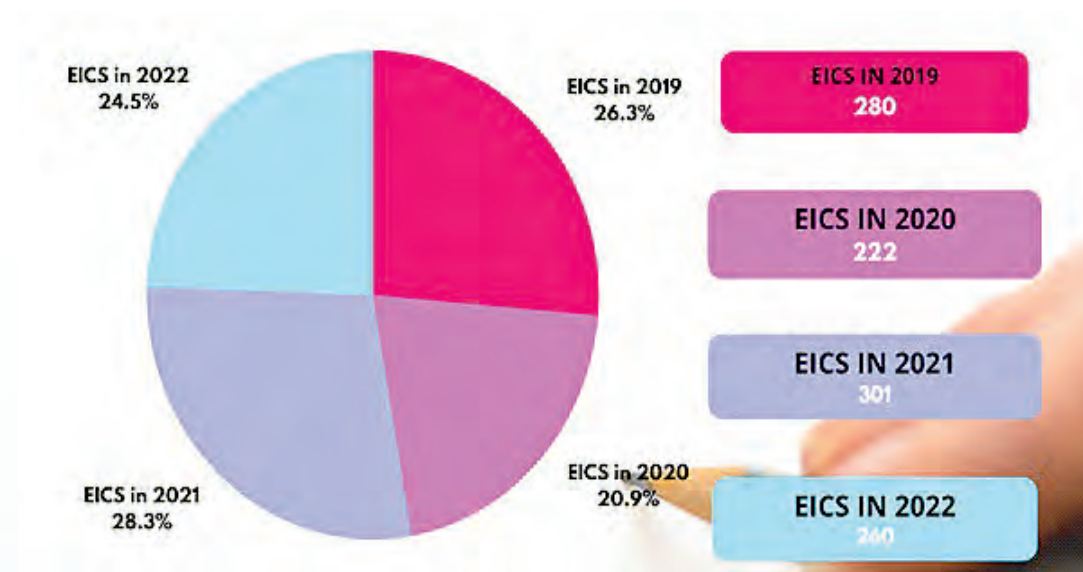
EICS evaluates MDAs compliance to ethics, integrity, statutes, policies and regulations based on three key performance indicators (KPIs): Management Culture and Structure (MCS), Financial Management Systems (FMS) and Administrative Systems (AS). It is a monitoring and evaluation tool domiciled in the System Studies and Review Department (SSRD) of the Commission which was fully deployed in 2019, 2020, 2021 and 2022 under the current Board.

In the four years under review, the scorecard was deployed to 1,350 MDAs - 280 MDAs in 2019, 350 MDAs in 2020, 360 MDAs in 2021 and 360 MDAs in 2022. The Commission, however, assessed 1,063 MDAs on the ethics and integrity compliance scorecard between 2019 and 2022. The highest number of MDAs assessed on the EICS was recorded in 2021 with 301 MDAs, while 280 MDAs were assessed in 2019, 222 MDAs in 2020 and 260 MDA in 2022.

**TABLE 5.0: FUNDS RESTRAINED THROUGH SYSTEM STUDIES AND REVIEW IN MDAS AND EICS ASSESSMENT**

	2019	2020	2021	2022	TOTAL
EICS deployed to MDAS	280	350	360	360	1,350
MDAs assessed	280	222	301	260	1,063
Funds restrained through SSR & ICPC Advisory (N)	41,980,000,000	147,149,973,310	5,771,868,129	59,963,166,099	254,865,029,539

## PIE CHART OF ETHICS AND INTEGRITY COMPLIANCE SCORECARD 2019 – 2022



Some of the contributions of the EICS include reawakening MDAs' consciousness to improving efficiency in their operations, compliance with policies and standards as well as improving record keeping as the scorecard is evidence based. This has also enriched MDAs' drive towards development of relevant guidelines for promoting ethical standards and compliance in the workplace such as development of domesticated code of ethics, corruption prevention guide, and whistleblowing policies, amongst others.

Other contributions of the EICS deployment to the MDAs include better utilisation of government funds, improved asset register management, improved procurement integrity and due process, and establishment of internal anti-corruption mechanisms as well as anti-corruption units.

### 5.3 CORRUPTION RISK ASSESSMENT:

The Corruption Risk Assessment (CRA) tool adopts the approach of analysing and estimating the likelihood and impact of forms of corruption on an organisation or sector through careful environmental, organisational/sectoral and personnel analyses. CRA places a premium on prevention as an effective complement to enforcement in the war against corruption.

Methodology of the CRA includes identifying risks specific to the agency, rating the probability and potential impact of each risk, presenting mitigating actions, controls and processes, and calculating residual or unforeseen risks and response plans.

Between 2013 and 2018, the Commission conducted CRAs in the Ports sector, Education, Health, Water Resources and the Lagos and Abuja International Airports. A CRA was also conducted on the E-government platforms.



The 4<sup>th</sup> Board reviewed the findings of these CRAs and continued the implementation of the recommendations.

In the Ports Sector, for example, ICPC is a member of the Projects Steering Committee, which implements the recommendations of the CRA. The recommendations of the CRA led to the launch of the Ports Service Support Portal and the Nigerian Ports Process Manual that contains all the processes that should take place in the ports. ICPC is also a member of the Ports Standing Task Team which was set up to entrench accountability, transparency and integrity, and boost enforcement activities at the ports.

Recommendations from the CRAs in the other sectors are still being implemented in collaboration with relevant stakeholders.

#### **5.4 ANTI-CORRUPTION AND TRANSPARENCY UNITS (ACTUs)**

The experience of the Independent Corrupt Practices and Other Related Offences Commission (ICPC) in dealing with the pervasive nature of corruption led to its realisation that the involvement of the citizens in preventing and fighting the vice was a cardinal way of effectively stemming the tide of corruption.

The Commission consequently established the Anti-Corruption and Transparency Units (ACTUs) in the MDAs as one of its strategies to tackle corruption in the public service using staff of the organisations. This is premised on the belief that those working directly in the organisations would have a better understanding and ability to identify causes and fertilising agents of corruption within their organisations.

ACTU was created to serve as an extension of ICPC in MDAs through an approval by government, vide the Head of the Civil Service of the Federation circular Ref. No. OHCSF/MSO/192/94 dated 2nd October 2001. Other extant Circulars guiding the operations of ACTUs are Circular Ref. No. OE/MS/MSO/196/S1/7 dated 16th April 2003 and OHCSF/SPSO/CSTD/314/T2/61 dated 5<sup>th</sup> October, 2016. The underlying reason for the establishment of the unit was to complement and strengthen the efforts of the Commission in the areas of monitoring, reporting and preventing corruption in the MDAs.

The Unit, deriving from Section 6 (b)-(d) of the Corrupt Practices and Other Related Offences Act 2000, is empowered to examine and review corruption-prone systems, practices and procedures, monitor budget implementation of their organisation, develop whistleblowing platforms for reporting, undertake preliminary investigation into complaints and petitions received, and serve as observers on relevant committees within their organisation. They are also to develop a code of ethics for staff within their organisation and conduct regular anti-corruption sensitisation.

ACTU activities are guided by the Standing Order for the Operations of ACTUs, issued by ICPC. Currently, there are **490 ACTUs** in existence in MDAs, out of which 265 were established in MDAs between 2019 and 2022.



**TABLE 5.1: ACTUS ESTABLISHED IN MDAS BETWEEN 2019 AND 2022**

YEAR	ACTUS INAUGURATED
2019	69
2020	66
2021	65
2022	65
TOTAL	265

The presence of ACTUs in the MDAs has brought remarkable impact on the anti-corruption crusade in many ways:

- Introduction of some level of accountability in the manner public officials do business, as ACTUs demand probity from public office holders, especially in the allocation and utilisation of public resources.
- Introduction of code of ethics and corruption prevention guide for staff of their organisations. 30 ACTUs have developed code of ethics for their respective MDAs to improve ethical re-orientation and compliance.
- Organisation of sensitisation programmes in MDAs to educate them on and against the ills of corruption.
- Conducting preliminary investigation of petitions either written by staff of their organisations or transferred to them by ICPC. Some successful investigations carried out by ACTUs are those of University of Calabar on employment racketeering, and Federal Polytechnic Nekede on allegation of extortion by an academic staff of the Polytechnic.
- Identification of outstanding staff for reward, which has contributed to ethical reorientation e.g. FAAN.
- Provision of viable intelligence to the Commission which has resulted in assets recovery.
- Specific collaborations and joint operations introduced by some ACTUs which has led to success in the enforcement mandate e.g ICPC/PTAD collaboration leading to a high number of prosecution of pension scammers.

### 5.5 ACTU EFFECTIVENESS INDEX

ACTUs have the responsibility to promote accountability in organisational life and operations. MDAs are expected to ensure the establishment of ACTUs and support the ACTUs to realize their responsibilities in accordance with their stated mandates.

The ACTU Effectiveness Index (AEI) assesses several elements of ACTU operations. These include composition of members, inauguration and induction, action plan, office accommodation and facilities, budgets and funding, support by ICPC ACTU Desk officers, impact of organizational support to ACTU, ACTU member capacities and the sustainability of the Unit.

It is expected that the assessment of the ACTUs in the MDAs through the AEI will generate the required knowledge about ACTU operations in order to inform and guide ICPC to make the ACTUs more functional and effective, while also ensuring the integrity and accountability of the MDAs.

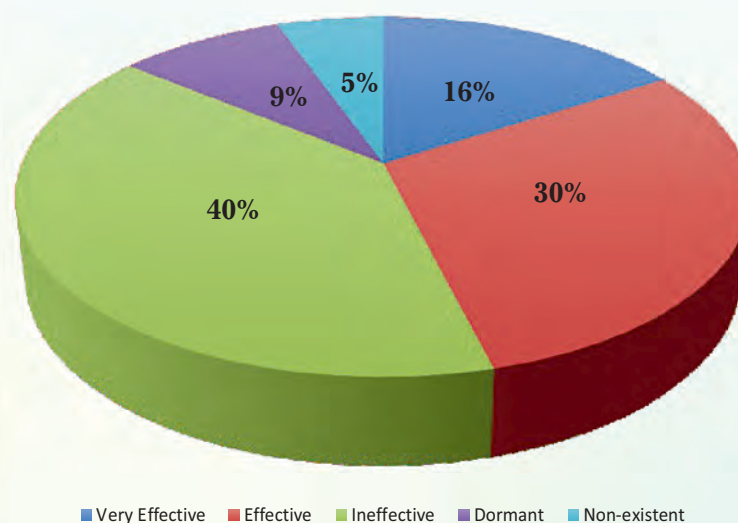
**TABLE 5.2: ACTU EFFECTIVENESS INDEX (AEI) RATING**

AEI RATING			
S/N	SCORE (%)	LEVEL OF EFFECTIVENESS	COLOUR RATING
1	70 - 100	VERY EFFECTIVE	GREEN
2	50 - 69	EFFECTIVE	BLUE
3	11 - 49	INEFFECTIVE	YELLOW
4	1 - 10	DORMANT	RED
5	0	NON-EXISTENCE	BLACK

**TABLE 5.3: ACTU EFFICIENCY INDEX FOR 2020, 2021 AND 2022**

Effectiveness	2020		2021		2022	
	Number	Percentage	Number	Percentage	Number	Percentage
Very Effective	26	16%	13	7%	30	12%
Effective	48	30%	55	28%	45	17%
Ineffective	64	40%	116	60%	104	40%
Dormant	14	9%	10	5%	7	3%
Nonexistent	9	5%			74	28%
<b>TOTAL</b>	<b>161</b>	<b>100%</b>	<b>194</b>	<b>100%</b>	<b>260</b>	<b>100%</b>

**Effectiveness of ACTUs 2020 Results**



## 5.6 CORRUPTION MONITORING AND INTELLIGENCE ACTIVITIES

The Commission engages in corruption monitoring and intelligence gathering activities as part of measures to prevent corrupt practices in public organisations. The activities that fall under this category include procurement processes, recruitment processes, and monitoring of promotion interviews and examinations, among others.





Between 2019 and 2022, the ICPC conducted 410 corruption monitoring activities in MDA which involved monitoring of bid openings, monitoring of promotion interviews and examinations, and monitoring of recruitment processes. This has provided the investigative arms of the Commission with actionable intelligence to carry out further investigations that may lead to prosecution.

In the period under review, the Commission in collaboration with National Primary Healthcare Development Agency monitored the distribution of three million, nine hundred and twenty-four thousand (3.924 million) COVID-19 vaccines and prevented the diversion and hoarding of the vaccines, and the distribution of adulterated vaccines.

### 5.7 ICPC WHISTLE BLOWING COORDINATION

ICPC along with other anti-graft and law enforcement agencies collaborated with the Presidential Initiative on Continuous Audits (PICA) Whistle Blowing Unit domiciled in the Federal Ministry of Finance, Budget and National Planning in executing the Federal Government's Whistle Blower Policy which came into effect in 2016.

Through this partnership and also solely, the ICPC has recovered huge sum of funds including the sum of \$174 million which PICA with the assistance of ICPC, recovered from a multinational company and channeled into government's Treasury Saving Account.

During the period under review, the Commission received and promptly investigated nine complaints of official victimization, intimidation and highhandedness made by ACTUs or personnel of public bodies against management of MDAs. It proffered appropriate remedies to the complaints.



The Public Service Integrity Award being presented by the Former President



## 6.0 PUBLIC ENLIGHTENMENT AND EDUCATION

**U**nder Section 6 (e – f) of the Corrupt Practices and Other Related Offences Act, 2000, the Commission is mandated to educate the public on and against bribery, corruption and other related offences and to mobilise public support in combating corruption. To accomplish this mandate, the 4<sup>th</sup> Board, in 2021, merged the Education and Public Enlightenment departments to form a new Public Enlightenment and Education (PE&E) Department.

While the Education Division focuses on identifying different stakeholder groups (such as civil society organizations, faith-based organizations, traditional rulers, students, youths, women, public servants, etc.) and designing programmes for each of the groups, the PE Division uses a mass media and public relations approach to reach all these groups and the general public using the electronic, print and social media, and deploying public relations strategies to engage with the public.

The Anti-Corruption Academy of Nigeria (ACAN) located in Keffi, Nasarawa State, also has a part to play in achieving this mandate and it was enhanced to engage in researches, physical and virtual trainings for both ICPC staff and others, and to hold dialogues around policy issues.

Some of the initiatives of the 4<sup>th</sup> Board in line with the public enlightenment and education mandate include My Constituency, My Project campaign, the finalization and approval of the National Ethics and Integrity Policy (NEIP), the National Summit on Diminishing Corruption in the Public Sector, the Public Service Integrity Awards, National Policy Dialogues on germane topics by ACAN.

The Board also renovated the broadcast studio of the PE&E department and equipped it with state-of-the-art cameras and editing suites, sustained the Corruption-Must Go television programme of ICPC on NTA Network, NTA International as well as on NTA Language (Igbo, Yoruba and Hausa), publication of newsletters,

### 6.1 MY CONSTITUENCY, MY PROJECT CAMPAIGN

In 2019, after the launch of the Constituency and Executives Projects Tracking Initiative (CEPTI), the need for community involvement in the monitoring of the projects was identified. This led to the launch of the “My Constituency, My Project” campaign.

The campaign covered sensitization sessions during which citizens were educated and enlisted to monitor the implementation of the constituency and executive projects located in their communities, and to own the projects by protecting it against vandalization and ensuring its sustainability. The communities were informed of the Commission's toll-free lines, especially the smart number – 0800-CALL-ICPC – which they can call to find out projects allocated to their constituency. This has helped to remove the opacity and secrecy that affects constituencies and executive projects.



## 6.2 NATIONAL ETHICS & INTEGRITY POLICY (NEIP)

Another of the remarkable achievements of the fourth Board was the finalization of the development of a National Ethics and Integrity Policy (NEIP) by the Commission. The Policy was developed in collaboration with the Office of the Secretary to the Government of the Federation (OSGF) and the National Orientation Agency (NOA) in response to the many damaging effects of corruption in both the public and private sectors. The Policy was approved by the Federal Executive Council (FEC) on 19th August, 2020 and launched by former President Muhammadu Buhari on 28th September, 2020 during the 2nd National Summit on Diminishing Corruption in the Public Sector to celebrate ICPC's 20th anniversary.

The NEIP obligates all Nigerians and residents to uphold the core values of Human Dignity, Voice and Participation, Patriotism, Personal Responsibility, Integrity, National Unity and Professionalism. These values were drawn from the Constitution of the Federal Republic of Nigeria, the ICPC Act 2000, the NOA Act 2004, UNCAC and codes of ethics of several professional association.

The Commission developed the NEIP with a view to help restore and revitalise the public and private sectors, while enhancing values and integrity, and tackling corruption in the larger Nigerian society. Specifically, the policy was designed to:

- Strengthen efforts at positive national transformation, as citizens and those who relate with Nigeria imbibe and embody the core values.
- Help the country reach national development goals as the meaning of national purpose is reframed.
- Save the country from the ongoing erosion of ethics and collapse of values.
- Encourage citizens to put Nigeria above all else and diminish the need for “corruption as a survival strategy” and “enhance the survival of the weak” while controlling “the power of the strong”.
- Open up an ongoing dialogue as to how to refine behaviours to bring out the best in Nigerians.

To fully implement the NEIP, a Work Plan was developed for the different identified stakeholder groups, with activities to address issues around each of the groups. The Work Plan also contains a draft consequence management template which is to assist each group with deciding punishments for defaulting on the core values of the Policy, and rewards for compliance.

So far, the Commission has held about 40 sessions with the stakeholder around the NEIP and is still working towards developing materials to reach and pass across the message of the Policy.

The Policy empowers the Commission and other law enforcement agencies to sanction or prosecute anyone who goes against its principles and values or fails to implement its directives. The Policy can also be used by anyone to seek justice.

The development and implementation of the NEIP represents a significant milestone

in Nigeria's quest for a national rebirth that will introduce accountability and transparency in governance. It is set to bring about behavioural change by reconditioning citizens to work for national development, while encouraging them to cultivate respect and love for fellow citizens.



### 6.3 NATIONAL SUMMIT ON DIMINISHING CORRUPTION IN THE PUBLIC SECTOR

As part of measures to address corruption in the public sector, the 4<sup>th</sup> Board innovatively initiated in 2019, an annual National Summit on Diminishing Corruption in the Public Sector. The National Summit is a proactive idea to bring together stakeholders to assess, review and set the agenda for a corruption-free Nigeria.

The Summit, which has held annually since 2019 has had different themes such as “Together against Corruption” in 2020, “Corruption and the Cost of Governance: New Imperatives for Fiscal Transparency” in 2021 and “Corruption and the Education Sector” in 2022.

The 2020 Summit was also a forum to celebrate the Commission's 20<sup>th</sup> anniversary, which coincided with the nation's 60<sup>th</sup> anniversary. Apart from the National Ethics and Integrity Policy which was publicly launched by the former President at the event, the Commission recognized the winners of its anniversary youth music and essay competitions, and awarded the Public Service Integrity Awards to two deserving Nigerians.

Four (4) National Summits on Diminishing Corruption in the Public Sector have been held by the Commission with huge success. They have all been in the collaboration of the Office Secretary to the Government of the Federation, with the 2022 edition co-hosted by the Joint Admission and Matriculation Board (JAMB).



The summits had the former President grace the occasion and recognize Nigerians who have demonstrated high level of integrity in their endeavours, showcasing the good ethical values in the country.

## 6.4 PUBLIC SERVICE INTEGRITY AWARD

In order to encourage integrity and ethical standards in the public service, the Commission in 2019 instituted the Public Service Integrity Award to publicly recognize serving public servants who have distinguished themselves in ethics and integrity despite pressure to compromise.

Seven deserving Nigerians have been recognized for the awards and others, recommended to their organizations for recognition for their acts of integrity. The Public Service Integrity Awards are presented by the President during the National Summits on Diminishing Corruption in the Public Sector.



## 6.5 ANTI-CORRUPTION INITIATIVES WITH CIVIL SOCIETY ORGANISATIONS

In a bid to reach the greater populace, the ICPC initiated some actions with Civil Society Organisations (CSOs) to mobilise the citizenry on the need to shun acts of corruption, report corrupt practices and be involved in the anti-corruption crusade.

Some CSOs are registered with the Commission under the National Anti-Corruption Coalition (NACC). The Commission supported 270 anti-corruption activities initiated by the CSO platforms between 2019 and 2022 to engage the public in combatting



corruption in Nigeria. A breakdown of the anti-graft agency's support to CSO platforms indicated that 85 activities by the CSO platforms were supported in 2019, 70 in 2020, 40 in 2021 and 75 in 2022.

## 6.6 NATIONAL VALUES CURRICULUM

When the Independent Corrupt Practices and Other Related Offences Commission (ICPC) was established in the year 2000, the first thing it observed was the absence of civic education in the curricula of schools in Nigeria. By 2003, it partnered with the Nigerian Educational Research Development Council (NERDC) to produce the National Values Curriculum (NVC).

The aim of the Curriculum is to restore character in education as this helps to create a generation that learn to say no to corruption. From 2007 till date, these cherished values are being taught in schools. It has been extended to the Polytechnics and Colleges of Education nationwide.

The NVC has 12 core values of honesty, discipline, the right attitude to work, citizen rights and duties, national conscience, contentment, regard, courage, family values, religious values, and traditional values which are already topics in civic education and are now built into different subjects having been developed into objectives and teaching methodology.

The ICPC Fourth Board identified Values-Based Education in the form of the NVC as one of the most strategic corruption prevention approaches of the Commission. This initiative is a long-term plan intended to bring about upright youths exhibiting the identified values while turning them away from the vices of corruption and related offences.

Between 2019 and 2022, the Commission took some strategic actions to train teachers in Kano, Rivers, Akwa-Ibom, Lagos states and the FCT, and enlighten stakeholders in the education sector to embrace its value reorientation and resuscitation thrust in

**TABLE 6:0 PUBLIC ENLIGHTENMENT & EDUCATION ACTIVITIES BETWEEN 2019 AND 2022**

S/No	Activity	2019	2020	2021	2022	TOTAL
A.	Sensitisation of diverse stakeholders	667	538	749	940	<b>2,894</b>
B.	Oversight actions by ICPC supported CSO Platforms	85	70	40	75	<b>270</b>
C.	Student anti-corruption clubs launched in schools	107	28	47	358	<b>540</b>
D.	News Releases and Media Advisory	210	105	193	277	<b>785</b>
E.	TV Programme (English and WAZOBIA) Corruption Must Go Production	74	91	99	194	<b>458</b>
F.	Website Hits and Social Media feeds	1,101,731	1,818,097	888,222	3,667,232	<b>7,475,282</b>



order for them to transfer same to children. The Commission is in the process of reviewing the curriculum to enrich its content in the light of current realities.

## **6.7 FORMATION OF ANTI-CORRUPTION CLUBS AND VANGUARDS**

As follow up to the introduction of the NVC, there was need to form Students Anti-corruption Clubs in both primary and secondary schools, where integrity lectures embedded with these values are delivered nationwide. These clubs have over the years produced wards of exemplary characters.

Students' Anti-Corruption Vanguards are established in institutions of higher learning be it private or public for the continuity of activities for members of the secondary school clubs, and outreach to older students. The Vanguards have given the students more opportunity to participate actively in the struggle against corruption.

The Vanguards have also been a source of protection for students on campuses. A number of them have been exposed to workshops on sextortion and other forms of sexual harassments by civil society organisations working with ICPC and in some institutions e.g. at the College of Education Zuba FCT, all sexual harassment cases are being handled by the Vanguard.

During their regular meetings, members of the clubs and vanguards are empowered with the required knowledge and materials to organise advocacy sessions on anti-corruption in their respective institutions. During the four years under review, the Commission established 540 anti-corruption clubs and vanguards in primary and secondary schools and tertiary institutions nationwide.

## **6.8 ICPC TELEVISION PROGRAMME – CORRUPTION MUST GO**

In fulfilling its mandate of public enlightenment and educating the public, the Commission utilised its television programme on the Nigerian Television Authority (NTA) otherwise known as “Corruption Must Go” to reach a wider audience in combatting corruption in the country.

The objective of the TV programme is to sustain citizens' enlightenment and mobilisation, sensitise and educate the public, and provide credible information on the activities of the Commission in tackling corruption.

A total of 458 episodes of “Corruption Must Go” were aired between 2019 and 2022. Issues discussed on the TV programme include ICPC arraignments and convictions, National Ethics and Integrity Policy, the Media in the fight against corruption, Eradicating bribery and kickbacks in MDAs: Role of ACTUS, Focus on Illicit Financial Flows, Attitudinal Change and Citizens Engagement in Budget Monitoring, Opportunity Cost of Corruption, Role of Religious Leaders in the Fight Against Corruption, Community Participation in the Anti-Corruption Fight, and Sexual Harassment in the Workplace, among others.

The Corruption-Must-Go programme was also aired in Hausa, Igbo and Yoruba on



NTA Language and covered the same topics as the English editions. Similarly, the TV programme airs on NTA International for a wider audience.

### 6.8.1 UPGRADING OF THE ICPC STUDIO

Under the leadership of the fourth Board, the recording studio where the Commission's flagship programme “Corruption Must Go” and other jingles are produced was expanded and upgraded. The expansion and upgrading of the studio were part of the renovation and construction projects executed by the Board between 2019 and 2022.

The Commission embarked on remodeling and upgrading of the Studio in its quest to see it fully equipped and delivering on its mandate. With the bigger studio, the Commission procured modern gadgets and equipment during the four years under review to make production seamless, efficient and qualitative.

In 2019, the Commission under the fourth Board, procured new equipment for the studio such as a teleprompting machine, two editing suites on Apple iMac desktop computers, two royal televisions for preview, one iPad, and 2 16 terabyte external hard drives. The Commission also procured multimedia projectors and projector screens, public address systems and Sony still cameras for the 15 State Offices,.

More equipment were also procured in 2020 which included two Sony video cameras, one Sony still camera, mini DV tapes converter, one Sony still camera, four 64gb memory cards, video converter and two 4 terabytes amortad external hard drives, while in 2021 the Commission further modernized the Studio to give it a great look with the acquisition of studio lights.

Since then, in 2022, more studio equipment and other gadgets were procured to help in the smooth hosting of the annual summit. The new equipment one Sony video camera, four studio lights, four 8 terabytes electrical external hard drives, two tripods, two 128GB memory cards, Boya mics, capture card and adapter/extension).

### 6.9 POLICY DIALOGUES

The policy dialogues and its accompanying policy briefs anchored by the Anti-Corruption Academy of Nigeria (ACAN) are designed to be part of the Commission's key performance indicators in pursuit of the National Anti-Corruption Strategy

**TABLE 6.1: SENSITISATION SESSIONS BETWEEN 2019 AND 2022**

YEAR	SENSITISATION SESSIONS CONDUCTED
2019	667
2020	538
2021	749
2022	940
<b>TOTAL</b>	<b>2,894</b>





(NACS), 2017-2021 of the Federal Government of Nigeria, as well as the Policies, Programmes and Projects Audit Committee (PPPAC) Roadmap (2019-2023) adopted by the government at the commencement of the second term of former President Muhammadu Buhari in 2019.

These twin documents (NACS & PPPAC) require that stakeholders are made part of the ICPC activities in order to achieve one of its objectives stated earlier.

Policy dialogues consider issues that focus on more systemic and institutional improvements, which are sustainable regardless of changes in political administration, while the concomitant policy brief offers solutions that are practicable and directly relevant to the improvement of the subject matter of the policy

Five policy dialogues have been held under the current board between 2019 and 2022 and they are National Policy Dialogue on Eradicating Electoral Corruption with Focus on Vote Buying; Prevention of Corruption in Security Budgeting with focus on Engendering Accountability for Security Votes without Jeopardizing National Security; National Dialogue on Corruption and Cost of Governance in Nigeria; Entrenching Transparency in Public Service Recruitment in Nigeria, and Corruption and Insecurity in Nigeria.

## 6.10 SENSITISATION SESSIONS

In a bid to educate and mobilise support for the fight against corruption, the Commission engages citizens through sensitisation sessions which are aimed at building their capacity on issues of corruption, anti-corruption and engendering the needed drive to stem the tide of corruption in the society.



Some current publications



## 7.0 FINANCE & ACCOUNTS

**T**he Finance and Accounts (F&A) Department is one of the Support Departments of the Commission. It services financial management processes of the Commission and ensures the provision of funding for all day-to-day running of the Commission. The department is mostly manned by accountants with a few admin staff.

The F&A Department prepares the Annual Budget Estimate of the Commission, receives and disburses allocations released to the Commission, monitors budget implementation to ensure that it is in line with the Appropriation Act, provides financial advise to the Board for policy making, and to investigators for operational activities and liaises with the Office of the Accountant General of the Federation, Office of the Auditor-General of the Federation, Central Bank of Nigeria and Budget office, and responds to audit queries and invitations by the Public Accounts Committee of the National Assembly.

The Department also conducts Systems Study and Reviews/Financial Surveillance of MDAs and provides recommendations to management on areas of lapses observed. To achieve this last function, the Department has a Financial Analysis Section which monitors compliance of financial transactions of MDAs in line with the Financial Regulations. This role supports the enforcement and preventive mandates of the Commission and some of the activities carried out under Section include Systems Study and Review of Personnel and Capital Budgets of MDAs, Restriction of transfer from the Government Integrated Financial Management System (GIFMIS) to Sub-TSA, Access to Personnel Cost Funds by MDAs, and Digitization of Assets Profiling, among others.

### 7.1 RETAINED/RESTRAINED OF THIRD-PARTY FUNDS

The Finance and Accounts Department of the Commission played a crucial role in restraining further diversion of third-party funds (PAYE Tax, etc) through its analysis of the Integrated Payroll and Personnel Information System (IPPIS) transactions of MDAs.

A total of N220 million tax was diverted by MDAs between 2018 and 2020 among other third-party deductions like Cooperative and Union Dues. The funds were restrained and retained within the system when IPPIS was alerted about the leakages. This breakthrough was achieved through two basic steps:

- i. The first step taken by IPPIS is the initiation and conclusion of third-party deductions within the same time by role players (Initiator, Approver and Finalizer) to stem editing and manipulation by the MDAs. Hitherto, the GIFMIS payment batches for third-party were initiated for a week before conclusion of payment exposing it to editing and manipulation by MDAs' role players.
- ii. The second step taken by GIFMIS was the deactivation of MDAs' role players from performing personnel related transactions on GIFMIS. Consequently all



personnel budget lines (salary, non-regular allowance, pension, NHIS etc.) of IPPIS MDAs were blocked.

## **7.2 FUNDS MOP-UP AND MDAS' COMPLIANCE TO SYSTEM STUDIES**

The Commission mopped up the sums of N42 billion and N147 billion personnel cost in 2019 and 2020, respectively, being part of the outcome from 2019 System Study and Review.

Following the findings of the Commission of the wrong application of personnel cost on overhead and capital item, the Hon. Minister of Finance issued a negative warrant to mop up excess cash available in the personnel cost of the MDAs to forestall further misapplication of funds. A similar warrant was also issued in 2020 totaling N147 billion which was a huge savings to the Government.

The year 2020 was a challenging year with the devastating effect of COVID-19 resulting in low revenue, low crude sales, low economic activities and recession among others, hence the significance of blocking leakages and wastages within the system. The Commission also restrained the sum of N49 billion from the Systems Study and Review of personnel cost of MDAs between January and June 2022. The funds were restrained as a result of the negative warrants from personnel cost in all MDAs.

The activities of the Commission have resulted in the reduction of infractions both in volumes and occurrence by the MDAs. This observation followed the reassessment of level of compliance of MDAs to Systems Study. Some MDAs refrained from previous infractions. For instance, misapplication of personnel cost on burial expenses, DTA, training, disengagement allowance, and electricity bills were not observed. Migration of almost all the MDAs to IPPIS also assisted in this regard.

## **7.3 ACCESS TO PERSONNEL COST FUNDS BY MDAS**

This was seamlessly achieved through restriction placed on MDAs' GIFMIS Role Players in accessing the Personnel Cost by the Office of the Accountant General of the Federation (OAGF) which account for massive savings in 2020. Access to this account by GIFMIS Role Players is a major concern to the National Budget considering the fact that Personnel Cost takes a huge chunk of the recurrent budget through misapplication and misappropriation of the funds.

## **7.4 RESTRICTION OF TRANSFER FROM GIFMIS TO SUB-TSA**

Another leakage within the system is the transfer of funds from the GIFMIS platform to MDAs' sub-TSA Account and Microfinance Banks. This was observed largely with Tertiary Institutions before their migration to IPPIS, basically to warehouse the funds and secure them before closure.



Such transfers include:

- i. Transfer to Naira Transit Account in the guise of foreign exchange;
- ii. Transfer to sub-TSA Operation Account, and
- iii. Transfer to Microfinance Banks in the guise of casual workers wage among others.

If this restriction is achieved, a substantial savings can be made in this regards in line with the Presidential directives to block leakages amidst dwindling revenue outlook.

## **7.5 STRICT PERSONNEL COST BUDGETTING**

For the first time in the history of the country, an attempt was made in getting the actual payroll cost budget of the Federal Government through direct extraction of the nominal roll of MDAs from the IPPIS database for the preparation of Budget 2021 Personnel Cost.

This was part of the observation made by the Commission in the 2019 Systems Study and Review; that MDAs padded their personnel cost proposal to access excess funds from government far above their wages and salaries, since releases on this budget line is actual, then misapplied them for non-personnel related expenditure.

## **7.6 IMPROVED FUNDING FOR THE COMMISSION**

One of the success stories of the fourth ICPC Governing Board is the achievement of an improved budget for the Commission during the administration of former President Muhammadu Buhari. Poor funding of the Commission by past administrations had constrained it in carrying out its statutory obligations.

Under the fourth Board, the Commission's personnel cost, overhead and capital expenditure improved significantly when compared with previous years' figures.

The Commission's total appropriation releases increased by N1.690 billion from N6.544 billion in 2019 to N8.234 billion in 2020, while the appropriation releases grew by N4.236 billion and N1.990 billion to N12.470 billion and N14.461 billion in 2021 and 2022, respectively.

The personnel cost rose progressively from N3.807 billion in 2019 to N5.235 billion in 2020, N8.991 billion in 2021 and N9.842 billion in 2022, while the overhead cost was N1.812 billion in 2021 and 2022, respectively. The personnel cost was N1.312 billion in N1.313 billion in 2019 and N1.510 billion in 2020.



**TABLE 7.0 IMPROVED FUNDING APPROPRIATION (RELEASES)**

S/N	Head	2019	2020	2021	2022
1	Capital	1,410,960,190.14	617,407,268.59	1,665,947,557.02	3,212,969,444.03
2	Special AIE	12,571,274.00	870,319,999.00		11,349,686.00
3	Overhead	1,312,886,012.68	1,510,738,344.90	1,812,886,013.00	1,812,886,014.00
4	Personnel Cost	3,807,505,157.50	5,235,633,840.45	8,991,825,975.26	9,842,367,703.00
	<b>TOTALS</b>	<b>6,543,922,634.32</b>	<b>8,234,099,452.94</b>	<b>12,470,659,545.78</b>	<b>14,461,313,902.20</b>
	<b>Increase From Previous Year</b>		<b>1,690,176,818.62</b>	<b>4,236,560,092.84</b>	<b>1,990,654,356.42</b>

## 7.7 DIGITALISATION OF ASSET PROFILING

The fourth ICPC Governing Board completed the digitization of the Fixed Assets Register for the entire assets of the Commission (Headquarters and State Offices), pending only printing of the labeling stickers for pasting on the assets.

Asset digitization helps to improve the existing transaction process and enhances the asset liquidity, which overall improves economic efficiency.

## 7.8 POLICY ADVISORIES

Following advisories by the Commission arising from its Systems Studies and Review of MDAs' personnel cost conducted in 2019, the Federal Government issued three treasury circulars to all the MDAs as part of measures to curtail abuse and misuse of personnel cost.

The new circulars are:

- i. Federal Treasury Circular No. TRY A7& B7 / 2020 (OAGF/CAD/026/V.111/525) dated 23rd June, 2020 titled: FINANCIAL GUIDELINES ON OPERATION OF SPECIAL PROGRAMMES/PROJECT ACCOUNTS IN MINISTRIES, DEPARTMENT AND AGENCIES (MDAs). This circular warned against payment above the threshold to staff in the name of Project Accountants in violation of the Financial Regulation.
- ii. Federal Treasury Circular No. TRY A9& B9 / 2020 (OAGF/CAD/026/V.111/557) dated 6th October, 2020 titled: CONTINUOUS RISING PERSONNEL COST IN MINISTRIES, DEPARTMENTS AND AGENCIES (MDAs). This circular warned against abuse and misuse of Personnel Cost for Overhead and Capital Related Expenses against the provision of the Appropriation Act.
- iii. Federal Government of Nigeria 2021 Personnel Cost Budget Call Circular: Paragraph 2.2.1 specifically provided that MDAs should note that “payment of salaries and allowance are for legitimate staff only. Any unauthorised payments from personnel cost will attract appropriate sanctions”. The Government therefore directed the MDAs to validate the payroll section from IPPIS. Likewise Paragraph 2.2.2 provides that no personnel cost provision will be made in the 2021 budget for any servicing employee of the FGN who is not captured in the IPPIS.



## 8.0 HUMAN CAPITAL DEVELOPMENT

**T**he Commission immensely invested in human capital during the four years period of the fourth Board, including staff training, retraining and development. On assumption of office in February 2019, the Board observed gaps in the human capital development and worked assiduously towards filling the gaps through improving the capacity of the staff in terms of in-house, local and foreign trainings, improvement in staffing and remunerations of the staff.

The Commission's Anti-Corruption Academy of Nigeria (ACAN) and the Administration and Human Resources Department played a crucial role in plugging the gaps of human capital development in ICPC. The staff were exposed to trainings and experiences that equip them to perform at their optimal level. Trainings were conducted by the ACAN, Administration and Human Resources, and professional associations as well as international bodies.

### 8.1 ANTI-CORRUPTION ACADEMY OF NIGERIA (ACAN)

The Anti-Corruption Academy of Nigeria (ACAN) is the research and training arm of the ICPC with mandate to build capacity of ICPC staff and other stakeholders especially public servants on anti-corruption measures and corruption risk assessments.

The establishment of the Academy is based on the Commission's doggedness to fulfill its enlightenment and education mandate in a systematic and sustainable manner, to achieve long term impact in the war against corruption. It is also partly in fulfillment of Nigeria's commitment to regional and global resolutions such as the African Union Convention on Preventing and Combatting Corruption (AUCPACC) and the United Nations Convention Against Corruption (UNCAC) respectively.

ACAN trains public and private sector officials on good governance, accountability, transparency, integrity, ethics and all issues relating to corruption and anti-corruption, and on improvement of systems and procedures for productivity and better service delivery. It also coordinates the Commission's National Policy Dialogues which bring together key stakeholders in any contemporary area of concern in government and society to proffer solutions for eliminating corruption therein.

Since its establishment, ACAN has piloted capacity building activities and these include - open training and bespoke programmes for public officers at federal and sub-national levels; building capacity of Anti-Corruption and Transparency Units (ACTUs); certificate programmes; specialised or sponsored programmes such as the Behaviour Change Project which is supported by the MacArthur Foundation, as well as international trainings and collaborations.

Between 2019 and 2022, ACAN conducted 102 training sessions, both physical and virtual, with 8,532 participants across the country and internationally. Of the 102 training programmes, the Academy trained 1,957 participants through 22



programmes in 2019 and 1,537 participants went through 20 training programmes in 2020.

The training programmes increased to 30 each for 2021 and 2022 attended by 2,900 and 2,138 participants, respectively. Prominent participants in the ACAN's programmes were heads of anti-corruption agencies in Africa, permanent secretaries and chief executive officers of MDAs, chief executive officers of public sector agencies, and heads of procurement units and officers, among several others.

**TABLE 8.0. ACAN ACTIVITIES BETWEEN 2019 AND 2022**

YEAR	PROGRAMMES/TRAININGS	PARTICIPANTS
2019	22	1,957
2020	20	1,537
2021	30	2,900
2022	30	2,138
<b>TOTAL</b>	<b>102</b>	<b>8,532</b>

Besides being empowered by the current Board to enrich its training programmes, ACAN has also witnessed massive infrastructure development during the four years under review.

A new access road of about 600 metres from the Expressway into the Academy was constructed with interlock bricks as well as a standard Information Centre with a reception area and an office. A gatehouse for security personnel manning the gate was also built. There is an ongoing construction of a 500-seater multi-purpose hall within the Academy.

ACAN's e-library has been upgraded with the provision of 25 all-in-one desktop computers, workstations and chairs. The library is equipped with state-of-the-art bookshelves and copiers. The Academy has also received a gift of two meeting owls for enhancement of online trainings and official meetings.

It installed Licensed Microsoft Office for 75 systems at the Learning Management (LMS) classrooms, while 53 high powered CCTV cameras that cover all critical areas of the Academy have also been installed to enhance security surveillance.

In view of the realities of an Information and Communication Technology (ICT) age, the Academy has developed an online platform for e-delivery of the contents of courses to participants. This is expected to provide an effective means of communication for the teaching and learning process. Apart from its digital classrooms, all the learning centres of the Academy are equipped with e-learning facilities, including full multimedia learning systems.

ACAN has continued to be the centre of excellence for trainings on Corruption Risk Assessment in the West African Sub-region. The Academy publishes the Journal of Anti-Corruption Studies, conducts the Nigeria Corruption Index survey, organises



annual Anti-Corruption lectures, and hosts thematic Anti-Corruption conferences and Policy Dialogues.

## 8.2 ADMINISTRATION AND HUMAN RESOURCES

The Administration and Human Resources Department is a Support Department responsible for harnessing the human resource efforts of the Commission towards meeting its vision and mission statements. It is also responsible for building the capacity of the workforce as well as ensuring that relevant tools and materials are made available for the efficient running of the Commission so as to achieve its mandate.

The Department has 2 Divisions – Human Resource Management (HRM) and General Administration. While HRM is responsible for Appointments, Promotion and Discipline (APD), Training and Development, Staff Welfare, Insurance and Pension Matters and the Performance Management System (which was recently created to replace the APER as a method of staff appraisal); General Admin is responsible for Stores, Transport and Maintenance.

As a core Directorate of the Commission, Admin & HR Department compliments the activities of other departments, and their work has resulted in the following:

- local and international training for the personal and professional development of staff
- increase in staff career prospects following from conversion and upgrading from lower to higher grade levels,
- proper exit planning and post-service life arising from pre-retirement training,
- A boost in staff morale due to improved welfare conditions
- Improved performance of staff after acquiring skills to address their capacity gaps, etc.

Among the local trainings that the staff of the Commission participated between 2019 and 2022 include: Advancing Criminal Justice Reform in Framework of the Administration of Criminal Justice Act, 2015; investigation courses, administrative courses, prosecution courses, general courses, handwriting training, and anti-money laundering training.

The Commission's staff also participated in international trainings such as Police Intelligence and Financial Investigation in Italy, Asset Forfeiture and Money Laundering in Accra, Ghana, Criminal Intelligence Analysis Course, Cryptocurrency training, International Corruption Excellence Award & Workshop, Exchange Programmes and Anti-Corruption Course for Judges and Prosecutors, Ghana.

On staff composition, the fourth Board increased the staff strength of the organisation during the four years period under review. Following a presidential approval for recruitment, the Commission recruited over 200 new staff in 2021, bringing the total number of staff of the Commission to about 1,000.





**TABLE 8.1. STAFF COMPOSITION**

<b>GRADE LEVEL</b>	<b>2019</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
03-06	53	48	127	116
07-13	586	574	668	627
14-17	138	132	180	195
<b>TOTAL</b>	<b>777</b>	<b>754</b>	<b>975</b>	<b>938</b>



**Oyo State Office**



**Sokoto State Office**



## 9.0 INFRA STRUCTURAL DEVELOPMENT

One of the highpoints of the ICPC Fourth Governing Board is the massive improvement in infrastructure and acquisition of modern information and communication technology at the Headquarters and State Offices. This is in addition to the construction of new model Offices across the States and new Offices at the Headquarters along with the transition from paper documents to electronic documents through the deployment of an Electronic Document Management System.

### 9.1 INFORMATION & COMMUNICATION TECHNOLOGY

In furtherance to the Commission's commitment to upgrade her services to contemporary standards and put in place robust information and communication technology infrastructure which commenced in 2020.

The Commission also enhanced its digital storage capability to accommodate the growing workload and data size with a disaster recovery plan in focus. Related to this is enhancement of the ICT roadmap which has resulted in improved and bigger web presence, enhanced local area network, and introduction of security closed circuit monitoring system, among others.

The Board and Management of the Commission have carried out the following ICT improvement at the Headquarters and the State Offices between 2019 and 2022 –

- \* The Commission through its ICT infrastructure was able to overcome the impediments caused by the Covid-19 pandemic to host hundreds of virtual meetings and capacity building programmes between 2019 and 2022;
- \* The Commission's bandwidth has been upgraded;
- \* The Commission's website has been upgraded from 100GB to 500GB;
- \* Completed the development of video file compression application to reduce storage of footage of interviews conducted during interrogation and to enhance the upload of such videos to the Commission' central server;
- \* Currently implementing enterprise network security infrastructure to cover the ICPC State Offices;
- \* Upgrading of the Server Room into standard data centre.
- \* Purchase of extra servers and storage accessories for implementation of back-up strategy.

### 9.2 ELECTRONIC DOCUMENT MANAGEMENT SYSTEM (EDMS)

On assumption of Office in February 2019, one of the main tasks that confronted the Fourth Board of the Commission led by Prof. Bolaji Owasanoye, SAN, OFR, was the deployment of an Electronic Document Management System (EDMS) for petition, personnel, investigation, prosecution, constituency & executive project tracking reports, system study files and other confidential files.

The EDMS is a highly structured and robust software programme that centrally stores and organizes digital documents in one place. It provides easy document management,



transform paper files into an electronic document extract data, classify records and make them easily accessible and also centralizing the Commission's documents workflow.

The Commission adopted the EDMS (transition from paper documents to electronic documents) to provide a comprehensive solution for managing the creation, capture, indexing, storage, retrieval, and disposition of its records and information including the case files, petitions, confidential files, personnel files, reports and others.

The migration of documents to the EDMS commenced on 10<sup>th</sup> August, 2020, part of which included the electronic documentation of case files numbering twenty-one thousand nine hundred and eighty (21,980) archived from the inception of the Commission till date. All legacy records of the Commission such as petitions received, staff records and case files have been digitized by the Board.

In addition, the Commission has completed the application development e-archiving solution implementation with integrated data analytics features, and has purchased EDMS servers.

### **9.3 DIGITAL FORENSIC EXAMINATION**

Forensic technologies are critical to the Commission's intelligence and information gathering which aid investigation, address litigation and regulatory issues, and facilitates financial crime requirements. Information obtained is necessary to improve the possibility of timely investigation and prosecution of corruption cases.

The deployment of digital forensic technologies has greatly enhanced the Enforcement Mandate of the Commission. It is with this view that the Commission strengthened its forensic capacity by introducing a range of digital forensic infrastructure to further enhance the quality of investigation and improve the chances of prosecution by digital evidence. Such infrastructure enhances the ability to examine digital devices like cell phones, laptops, computers, and servers, and documents, among others.

These technologies have helped in tracing corruption and other related crimes such as forgery related matters, identity theft, internet fraud, cyber terrorism, cyber extortion, phishing, tax evasion, embezzlement, and fraud in banking, budget and procurement.

The Computer Security and Forensic Unit (CSFU) of the Commission has carried out hand writing analysis of disputed documents, conduct forensic polygraph examination and where necessary, ensures that investigations are aided by high quality digital forensic analysis of information and communication technology devices.

Modern document and handwriting analysis equipment and polygraph machines were acquired during the period under review which have proved useful in conducting background checks and evaluating the credibility of respondents.



In recent times, the Commission has collaborated with the Head of Civil Service of the Federation to profile candidates for key public offices through polygraph tests. In this regard, the Commission has assessed from 2021 to date –

- a. 71 Permanent Secretary nominees,
- b. 23 Accountant General of the Federation nominees, and
- c. 5 Auditor General for the Federation nominees.

The following digital forensics are in place in the Commission to extract or analyze data from different types of storage devices:

**i. Mobile Phone Forensics:**

It mainly deals with the examination and analysis of mobile devices. It helps to retrieve phone and SIM contacts, call logs, incoming, and outgoing SMS/MMS, Audio, videos, etc.

**ii. Disk Forensics:**

It deals with extracting data from storage media by searching active, modified, or deleted files.

**iii. Database Forensics:**

It is a branch of digital forensics relating to the study and examination of databases and their related metadata.

**iv. Email Forensics:**

It deals with recovery and analysis of emails, including deleted emails, calendars, and contacts.

**v. Memory Forensics:**

It deals with collecting data from system memory (system registers, cache, RAM) in raw form and then carving the data from raw dump.

The Commission has invested immensely in numerous tools and applications to carry out forensics' extraction and analysis of electronic devices and documents. Some of these tools are: CellebriteUFED, Encase, MobilEdit, Magnet Axion, Geolocator, ImsiCatcher, Imetracker, PC, Sentinel Visualizer, Excel, Ethical Hacking Tools, Polygraph data acquisition, Write Blocker, Oxygen Forensics, Tablean, VSC 80 (Document Analyzer), Froster + Freeman, Telescope, and external storage devices.

## 9.4 UPGRADE AND CONSTRUCTION OF INTERVIEW ROOMS AND DETENTION FACILITY

During the period under review, the Commission built state-of-the-art interview rooms which were installed with digital infrastructure including cameras for recording of suspects' interviews in conformity with provisions of Administrative of Criminal Justice Act, 2015.

Similarly, a modern detention facility equipped with CCTVs has been constructed in addition to the acquisition of customised surveillance vehicle for monitoring of street



level corruption and monitoring of suspects.

## 9.5 NEW STATE OFFICES

The ICPC Fourth Board increased the number of State Offices across the country from 15 to 21 by opening six new offices, one in each of the six geo-political zones.

The opening of the new offices is in line with the enabling Act and with a view to improving the capacity of the Commission to operate at subnational levels especially for systems reviews and projects tracking.

The State Offices opened during the four years period under review include: Ondo, Delta, Anambra, Borno, Niger and Katsina.

## 9.6 PROTOTYPE OFFICES

In line with the Commission's desire to own its own property, specifically constructed to meet its peculiar needs, ICPC Governing Board in 2019 commenced the purchase of land for the construction of its prototype offices. So far, 4 offices have been constructed and commissioned in Ibadan, Oyo State (February 2020), Sokoto, Sokoto State (November 2020), Yola, Adamawa State (July 2021) and Lokoja, Kogi State (January 2023).

## 9.7 RENOVATION AND CONSTRUCTION OF AUDITORIUM, GATE HOUSE AND CRECHE

A lot of physical infrastructure enhancement was undertaken by the current board during the four years under review. There was notably the construction of a new Gate House, Transport and Maintenance Section with computerized diagnostic equipment, Stores building and Creche as well as the renovation of the Auditorium with ultra-modern communication facilities, landscaping and general upgrade of the



ICPC Adamawa State Office (Prototype Building)/ Commissioning of the Kogi State Office Prototype Building



*Reconstructed ICPC Auditorium*

headquarters building. These have made the working environment more conducive for the officers of the Commission.

Below are the list of construction and renovation embarked on by the ICPC Board between 2019 and 2022:

1. Newly Built Prototype Offices in Sokoto, Oyo, Adamawa, Kogi, Enugu and Ondo States
2. Newly Built of ICPC Headquarters' Gate House
3. Newly Built Special Duties Division
4. Newly Built Detention Centre
5. Newly Built Transport & Maintenance Workshop
6. Newly Built Detention Facility
7. Newly Built Portakabins
8. Newly Built Interview/Interrogation Rooms
9. Newly Built ICPC Perimeter Fence
10. Newly Built Modern Forensic Laboratory
11. Newly Built Information & Communication Technology Centre
12. Provided Access Tarred Road at the ICPC Headquarters
13. Provided Staff Meeting Rooms with furniture and latest Audio-Visual Equipment
14. Provided Staircase Stainless Iron Handrails for the Entire Main Building
15. Provided Iron Bars Access Control for the Headquarters Main Building
16. Provided Additional Offices for Staff with Work Stations
17. Provided Concrete Interlocking Floor Tiling of the Entire Premises of the Headquarters
18. Provided Personal Computers and Laptops
19. Renovated ICPC Offices in Bauchi, Akwa-Ibom and Lagos States
20. Renovated ICPC Board Room
21. Renovated ICPC Headquarters' Main Lobby with Multi-Media Notice Screen, Entrance Turnstile with Smart Card Access and Scanners
22. Renovated ICPC Headquarters' Auditorium & Equipped it with State-of-the-Art Audio-Visual Equipment, Control Room & Luxury Seats.
23. Renovated Integrity Kitchen.
24. Renovated Hon Chairman's Office.
25. Renovated Offices of 12 ICPC Board Members.



26. Upgraded Fire Fighting System of the Commission.
27. Procurement of Medical Lab Equipment for Staff Clinic.
28. Enhanced Communication Network between Headquarters and States Offices for Virtual Meetings, Seminars etc.
29. Optimisation of the Network Installation.
30. LAN Optimisation at the Headquarters.
31. Configuration of the Server in Forensic Laboratory.
32. Upgraded Commission's Website from 50GB to 500GB.
33. Development of Electronic Document Management System.



*Newly Constructed Gatehouse*



## 10.0 COLLABORATIONS AND PARTNERSHIPS AGAINST CORRUPTION

The Commission has enhanced its collaborations and partnerships strategically in furtherance of its prevention mandate. These partnerships cover local and international partners. Local partnerships include collaborations with Anti-Corruption Agencies (ACAs) and Law Enforcement Agencies (LEAs) such as the Nigeria Police Force, Code of Conduct Bureau, Economic and Financial Crimes Commission, Nigeria Extractive Industries Transparency Initiative (NEITI) and National Drug Law Enforcement Agency (NDLEA). Overlapping functions have been eliminated with the initiation of Memorandum of Understandings (MoUs), joint investigations regarding investigation of corruption and money laundering cases.

Partnership with Nigeria Financial Intelligence Unit (NFIU) and other ACAs on post-observation period report regarding the country's Mutual Evaluation Review by Financial Action Task Force (FATF) and efforts to avoid grey-listing. Other partners are Federal Road Safety Corps (FRSC) and Vehicle Inspection Office (VIO) – on arrest of officers involved in street level corruption; Federal Inland Revenue Service (FIRS) on Recovery of un-remitted taxes from corporate entities; Independent National Electoral Commission (INEC) on monitoring elections to ensure integrity of the process and prevention of corrupt practices; Head of Civil Service of the Federation on Payroll verification to eliminate ghost workers and background checks of high profile public servants; Examination Bodies – examples JAMB for monitoring of examinations to prevent malpractices and arrest/prosecute persons engaging in same; and with National Universities Commission (NUC) and National Board for Technical Education (NBTE) towards eliminating fake academic institutions.

The ICPC has during the last four years collaborated with the Office of the Secretary to the Government of the Federation and the National Orientation Agency is organising an annual summit on diminishing corruption in the public sector which was graced by President Muhammadu Buhari.

In addition, the agency also collaborated with the Office of the National Security Adviser and the Service Chiefs in the series of national dialogues held while it partnered with the Federal Ministry of Finance, Budget and National Planning, Budget Office of the Federation and the Office of the Accountant General of the Federation in tackling budget padding and abuse of personnel and overhead costs.

International partnerships are ongoing with Coalition for Dialogue on Africa (CODA) for propagation and implementation of the Common African Position on Asset Recovery (CAPAR), and UNODC GloBE Network for Cross-Border Cooperation to End Corruption. Others are United States Department of Justice, Deputy British High Commission, Nigeria, National Crime Agency (NCA), United Kingdom, International Police (INTERPOL), International Anti-Corruption Academy (IACA), Commonwealth Africa Anti-Corruption Centre (CAACC), MacArthur Foundation, Ford Foundation, Network of National Anti-Corruption Institutions in West Africa (NACIWA), Association of Africa Anti-Corruption Authorities (AAACA), British Council and State of Palestine.





## 11.0 AWARDS AND RECOGNITION

The Chairman of the ICPC, Prof. Bolaji Owasanoye and the Commission received numerous awards and recognitions at the local and international levels for its outstanding performance in the fight against corruption. The awards include:

**i. 2022 National Honour Medals**

The Chairman of the ICPC, Prof. Bolaji Owasanoye received the national honours of Officer of the Federal Republic (OFR) while the Commission's Director of Finance and Accounts, Mrs. Victoria Ayeni and the Director of Operations, Barrister Akeem Lawal, fsi, were bestowed with the national honour of Member of the Federal Republic (MFR).

Two retired directors of the Commission, Dr. Bala Umar Mohammed and Mrs. Rasheedat A. Okoduwa, mni, received the national honour of Member of the Federal Republic (MFR) and Member of the Order of the Niger (MON), respectively.

**ii. 2021 SAEMA Diligent Investigation Award**

The 2021 Security and Emergency Management Awards (SAEMA) for Diligent Investigation Award recognised ICPC's due diligence in investigation and for exposing 257 projects amounting to N20.138 billion being duplicated in the 2021 budget. Its diligent investigation led to the recovery of 301 houses from two civil servants and crackdown on illegal job recruitments. SAEMA award initiative recognises security, intelligence, response agencies and their personnel for invaluable contribution to the security, peace and development of Nigeria.

**iii. 2021/2022 First Position Award as the Best Website in Nigeria.**

ICPC got first position in the Federal Government scorecard for 2021/ 2022 ranking of 220 Websites of the Federal Ministries, Departments and Agencies. According to the Bureau for Public Service Reform (BPSR), the primary objectives of the Websites ranking are to strengthen MDAs capacity for transparency, accountability and good governance by providing unrestricted access to public information.

**iv. 2022 Outstanding Achievement in Collective Action Award by the Switzerland-based Basel Institute**

ICPC played a major role in the synergistic partnership on instituting transparency in relevant ports sector agencies in its management which attracted international commendation. Nigeria recently won the "Outstanding Achievement in Collective Action Award" of the Switzerland-based Basel Institute.

**v. 2022 SAEMA Award of Excellence in Public Information Management.**

ICPC received an award of excellence for outstanding accomplishment in the category of Public Information Management for providing well and thoroughly scrutinized media updates of any of its activities. SAEMA award initiative recognises security, intelligence, response agencies and their personnel for their invaluable contribution to Nigeria.



**vi. 2021 NTA Language Channel Award.**

The 2021 Nigerian Television Authority Language Award was part of activities that marked Channel 10's Anniversary. The NTA management was inspired by the virtue of ICPC Chairman's good citizenship, exemplary leadership and demonstrable commitment of the Commission to the national anti-corruption service, which necessitated the NTA Language Channel Award.

**vii. 2021 NIQS Presidential Award of Excellence.**

The Nigerian Institute of Quantity Surveyors (NIQS) Presidential Award of Excellence was presented to the ICPC in recognition of its commitment in ensuring prudent management of public funds in the constituency and executive projects in Nigeria. The laudable initiative has maximised the dividends of democracy and speedily ending the era of contractors corruptly siphoning public funds through abandonment, shabby or total non-execution of government projects.

**viii. 2021 OAU Award of Excellence to the ICPC Chairman.**

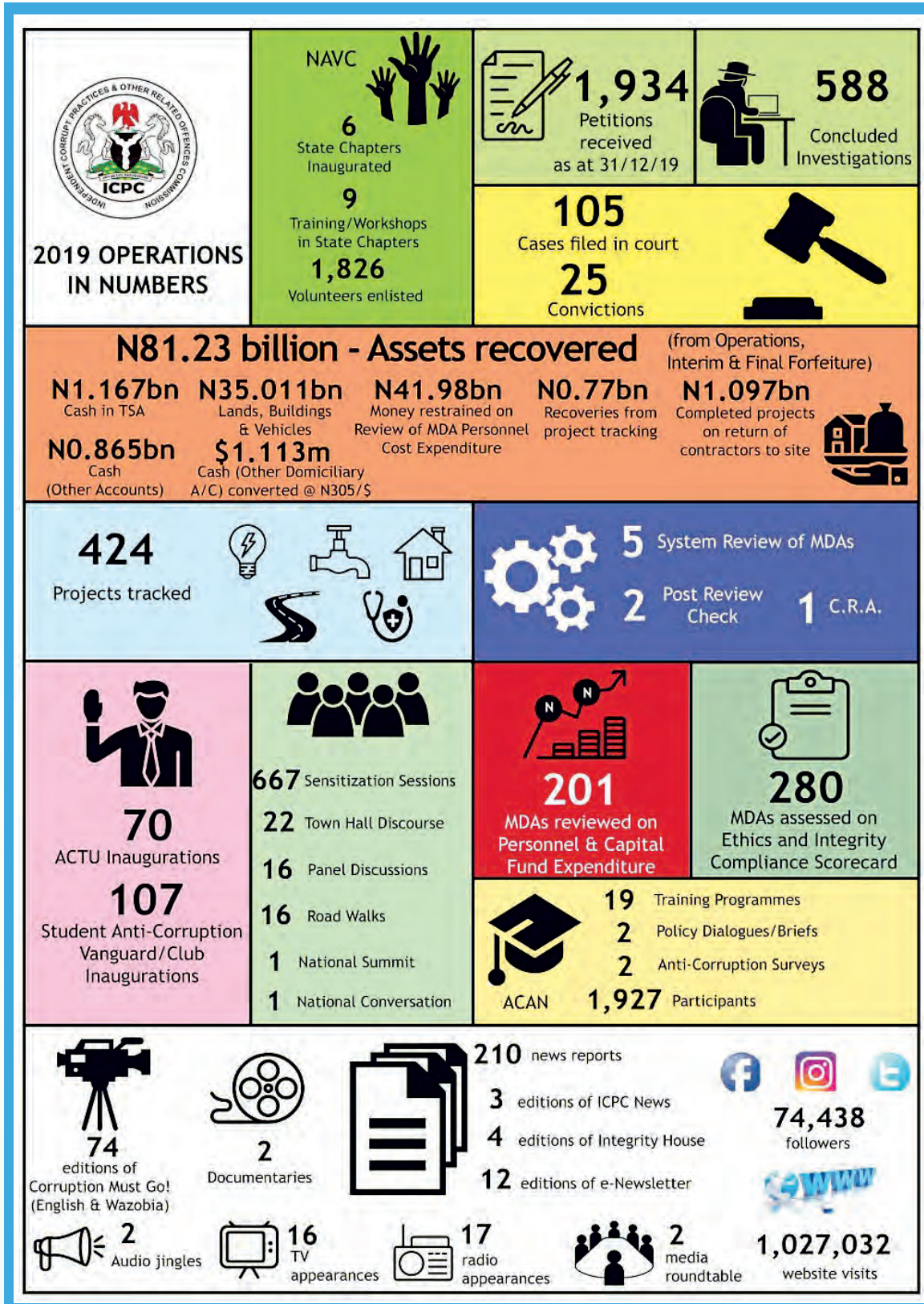
Obafemi Awolowo University, Ile-Ife, honoured the ICPC Chairman, Professor Bolaji Owasanoye, SAN, OFR with an Award of Excellence in celebration of the University's 60th Anniversary.

**12.0 ABBREVIATIONS**

ACTUs	Anti-Corruption and Transparency Units
ATRM	Asset Tracing, Recovery and Management
CAPAR	Common African Position on Asset Recovery
CEPTG	Constituency and Executive Projects Tracking Group
CEPTI	Constituency and Executive Projects Tracking Initiative
EICS	Ethics and Integrity Compliance Scorecard
EDMS	Electronic Document Management System
FEC	Federal Executive Council
ICPC	Independent Corrupt Practices and Other Related Offences Commission
ICT	Information and Communication Technology
IFFs	Illicit Financial Flows
MDAs	Ministries, Departments and Agencies
NACS	National Anti-Corruption Strategy
NEIP	National Ethics and Integrity Policy
POCD	Proceeds of Crime Department
SHART	Sexual Harassment and Abuse Response Team

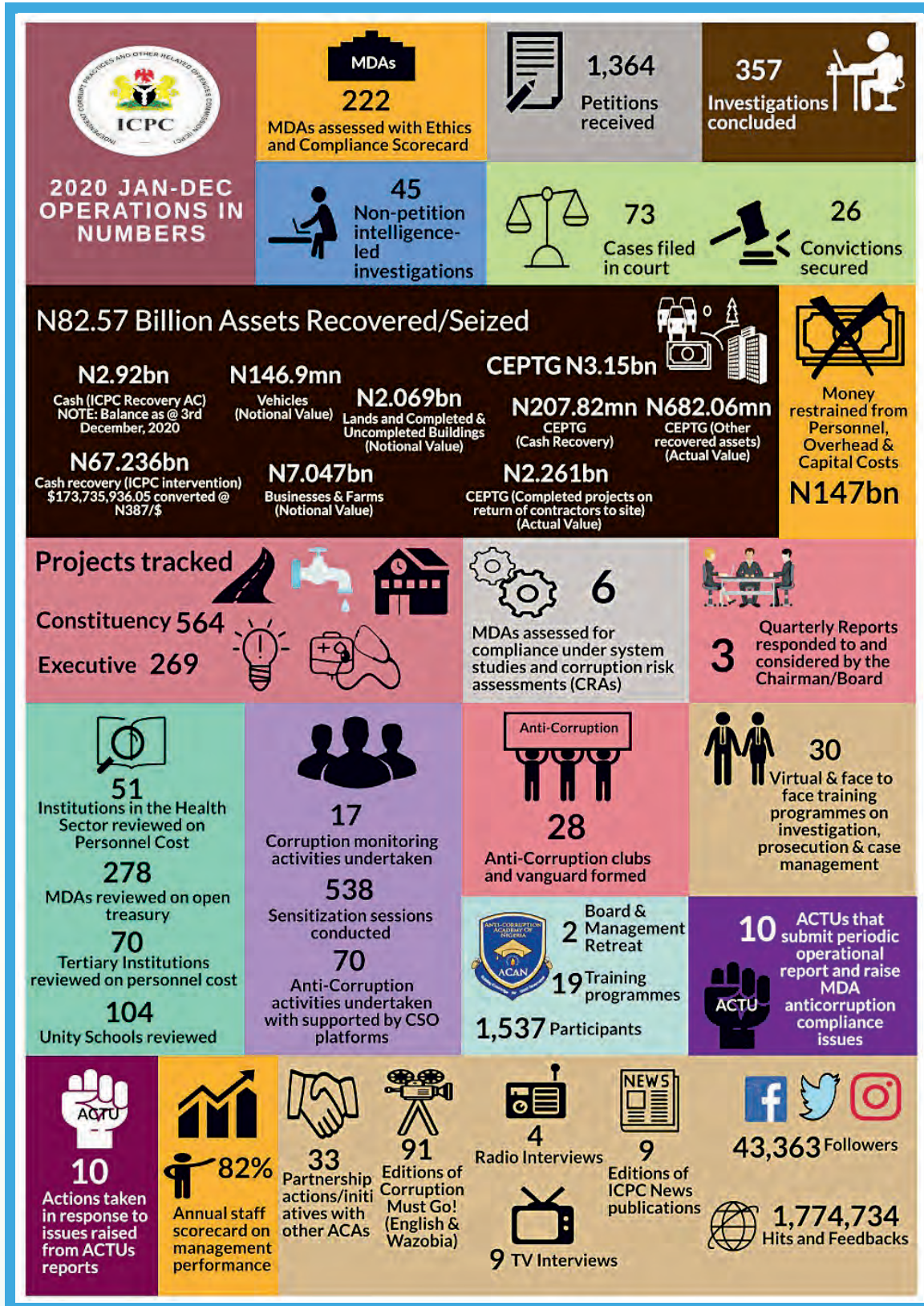


# 2019 ANNUAL PERFORMANCE REPORT





# 2020 ANNUAL PERFORMANCE REPORT





# 2021 ANNUAL PERFORMANCE REPORT

**KPI 1.01 Assets Recovered/Seized/Forfeited/Restrained**  
**N37.364bn**  
 Note: 15% of the Total Assets is yet to be valued

<b>N1.651bn</b> Cash Recovery in Naira	<b>N1.535bn</b> ICPC Tax Intervention	<b>N669.4m</b> Cash Recovery (ICPC Domiciliary Acct) \$1,620,950.89 converted @ N412.99/\$ as @ 31/12/21	<b>N6.85m</b> Rent received on forfeited Assets
<b>13</b> Vehicles N77.1m (Actual)	<b>31</b> Buildings N1.347bn (Actual) <b>13</b> Businesses N5.886bn (Actual)	<b>1</b> Jewelries N14.83m (Actual)	<b>5</b> Farms N34.77m (Actual) <b>6</b> Plots of Land N120.86m (Actual)

**N26.02bn** Total cash restrained  
**N5.772bn** Cash restrained through SSR tracking  
**N20.138bn** Cash restrained through budget tracking  
**N110.36m** Cash restrained through interim Forfeiture

**KPI 1.11**  
**1,393** Petitions received

**433** Petitions assigned for investigation  
**332** Petitions forwarded to other Agencies  
**581** Petitions closed based on Legal Advice

**KPI 1.02** **1,250** Investigations concluded  
**KPI 1.05** **1,098** Projects tracked under CEPTI

**KPI 1.24** **1,137** Non-petition intelligence-led investigations  
**1,104** Non-petition intelligence-led invest. concluded

**KPI 1.03** **67** Cases filed in Court  
**KPI 1.04** **356** On-going cases in various courts  
**15** Convictions secured

**KPI 3.12** **4** Quarterly reports considered by the Chairman/Board  
**79%** Annual staff scorecard on Management

**KPI 2.25** **30** Trainings programmes  
**2,900** Participants

**KPI 1.23** Officers trained in Investigation, Prosecution and Case Management  
**27** Trainings programmes  
 Virtual **880**  
 Physical **122**  
**Other Trainings**  
**14** Training programmes  
 Virtual **208**  
 Physical **162**  
 NB: Please note that some staff may have attended more than one training.

**KPI 2.15** **301** MDAs assessed with Ethics and Compliance Scorecard (Out of 360 Deployed)  
**KPI 2.14** **98** Corruption monitoring activities undertaken

**KPI 3.02** **87** MDAs reviewed on Open Treasury Portal  
**100%** Score on annual unqualified audit by external auditors

**KPI 2.24** **47** Anti-Corruption clubs and vanguard formed

**KPI 2.01** **20** MDAs assessed for compliance under system studies/CRA  
**5** MDAs finalized by SSRD from 2020  
**KPI 2.02** **7** MDAs reviewed

**KPI 2.23** **10** Zonal Stakeholders Dialogue on NEIP (1,283 participants)  
**749** Sensitization sessions conducted (290,292 participants)  
**KPI 2.21** **40** Anti-Corruption activities undertaken supported by CSO platforms

**KPI 3.11** **14** Partnership actions/initiatives with other ACAs  
**11** TV & Radio Interviews  
**8** Editions of ICPC E-News publications  
**193** News Reports/Releases / Media Advisory  
**KPI 2.22** **99** Hits & Feedbacks  
**888,222** Editions of Corruption Must Go! (English & Wazobia)



# 2022 ANNUAL PERFORMANCE REPORT

## N91.012BN Assets Recovered/Seized/Forfeited/Restrained

<b>KPI 1.01</b> <b>N2.767bn</b> Cash in Naira (ICPC Recovery Acct) (NB: This is inclusive of N396.94m cash recovery from CEPTI)	<b>N13.99m</b> Rent received on forfeited Assets <b>11</b> Electronics	<b>N190.20m</b> Cash Recovery (ICPC Domiciliary Acct) \$424,027.92 converted @ N448.55/\$ as @ 30/12/22 <b>20</b> Plots of Land <b>N685.87m</b> (Notional)	<b>N1.490bn</b> ICPC Tax Intervention <b>N659.70m</b> Cash (Other Accounts) (Beneficiaries) <b>CEPTI</b> <b>N13.053bn</b> Value of projects return site <b>N1.048bn</b> Assets Recoveries	<b>N59.963bn</b> Fund restrained through ICPC Advisory <b>N6.435bn</b> Cash restrained through Budget Tracking <b>N111.50m</b> Cash Restrained Final Forfeiture
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**KPI 1.11**

**1,357**  
Petitions received

**397** Petitions assigned for investigation

**398** Petitions forwarded to other Agencies

**559** Petitions closed (Not within the Commission's mandate)  
(NB: The differentials are petitions in transit)

**KPI 1.02**

**1,364**  
Investigations concluded  
(Inclusive of projects tracked under CEPTI)

**KPI 1.05**

**1,178**  
Projects tracked under CEPTI

**KPI 1.24**

**1,215**  
Non-petition intelligence-led investigations  
(Inclusive of projects tracked under CEPTI)

**89** Cases referred for prosecution

**19** Cases referred for further investigation

**1** Case recommended for closure

**1** Administrative case

**8** Cases under review

**KPI 1.03**

**64** Cases filed in Court

**36** Prosecution concluded

**KPI 1.04**

**19** Convictions secured

**KPI 2.25**

**30** Trainings programmes

**2,138** Individuals trained by ACAN

**KPI 1.23** Officers trained in Investigation, Prosecution and Case Management

**18** Training programmes

Virtual **613**

Physical **638**

Other Trainings

**17** Training programmes

Virtual **385**

Physical **115**

**100%**  
Annual Auditing of ICPC

**KPI 2.24**

**358** Anti-Corruption clubs and vanguards formed

**KPI 3.12**

**5** Quarterly reports considered by the Chairman/Board

**KPI 2.15**

**260** MDAs assessed with Ethics and Compliance Scorecard

**KPI 2.14**

**15** Corruption monitoring activities undertaken

**KPI 2.01**

**40** System Studies conducted in MDAs

**2** CRAs conducted

**KPI 2.23**

**940** Sensitization sessions conducted (352,734 participants)

**KPI 2.21**

**75** Anti-Corruption activities undertaken supported by CSO platforms

**KPI 3.11**

**14** Partnership actions/initiatives with other ACAs

**15** TV & Radio Interviews

**15** Editions of ICPC E-News publications

**277** News Reports/Releases / Media Advisory

**KPI 2.22**

Hits & Feedbacks

**194** Editions of Corruption Must Go! (English & Wazobia)

**3,667,232**



# 2023 MID-YEAR PERFORMANCE REPORT



## 2023 MID-YEAR PERFORMANCE REPORT

### N8.296BN Assets Recovered/Seized/Forfeited/Restrained

KPI 1.01



**N4.733bn**  
Cash in Naira  
(ICPC Recovery  
Acct)

**3**  
Vehicle  
(N27.5mn)



**N12.37mn**  
Rent received  
on forfeited  
Assets

**1**  
Business  
(N32.7mn)



**N718.18mn**  
ICPC  
Intervention  
(FMBN, Tax & Others)



**N2.627bn**  
Fund restrained  
through SSR

**N145.87mn**  
Cash Restrained  
interim Forfeiture

KPI 1.11



**637**  
Petitions  
received



**164**  
Petitions assigned  
for investigation  
**186** Petitions forwarded to  
other Agencies  
**276** Petitions closed  
(Not within the Commission's  
mandate)  
(NB: The differentials are  
petitions in transit)

KPI 1.02



**82**  
Investigations  
concluded  
(Inclusive of projects  
tracked under CEPTI)

KPI 1.05



**82**  
Projects tracked  
under CEPTI  
(Yet to commence)

KPI 1.24



**19**  
Non-petition  
intelligence-led  
investigations



**51** Cases referred  
for prosecution  
**10** Cases referred for  
further investigation  
**2** Case recommended  
for closure  
**2** Administrative case

KPI 1.03



**40**  
Cases filed in  
Court  
**17** Prosecution  
concluded

KPI 1.04



**409** On-going Cases  
**10** Convictions  
secured

KPI 2.25



**9**  
Trainings  
programmes  
**654**  
Individuals trained  
by ACAN

KPI 1.23



Officers trained  
in Investigation,  
Prosecution and  
Case  
Management  
**9** Training programmes  
Virtual **142**  
Physical **105**  
Other Trainings  
**7** Training programmes  
Virtual **528**  
Physical **68**



**100%**  
Annual Auditing  
of ICPC

KPI 2.24



**31**  
Anti-Corruption  
clubs and  
vanguards formed

KPI 3.12



**1**  
Quarterly  
reports  
considered by  
the  
Chairman/Board

KPI 2.15



**400**  
(On-going)  
MDAs assessed  
with Ethics and  
Compliance  
Scorecard

KPI 2.14



**24**  
Corruption  
monitoring  
activities  
undertaken

KPI 2.01



**12**  
System Studies &  
CRA conducted in  
MDAs  
System Review conducted  
(Yet to undertake)



KPI 2.23

**363**  
Sensitization sessions  
conducted  
(136,774 participants)

KPI 2.21

**19** Anti-Corruption  
activities undertaken  
supported by CSO  
platforms



**10**  
Partnership  
actions/initiatives  
with other ACAs



**5**  
TV & Radio  
Interviews



**7**  
Editions of  
ICPC E-News  
publications



**93**  
News  
Reports/  
Releases  
/ Media  
Advisory

KPI 3.11

**105**  
Editions of Corruption  
Must Go! (English &  
Wazobia)

KPI 2.22

**6,650,226**  
Hits & Feedbacks



# PHOTO GALLERY



BEFORE



AFTER

ICPC Auditorium



State of the Art Medical Lab



Newly installed Portacabins



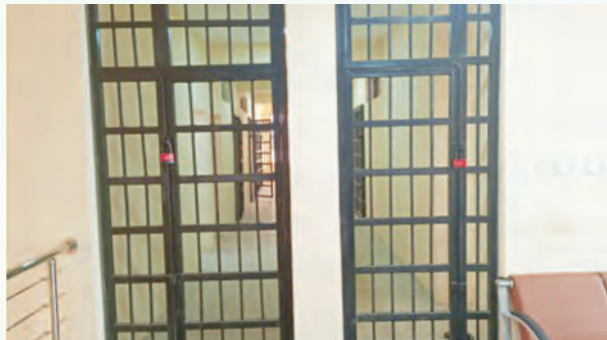
Forensic Lab



Newly renovated Lobby with turnstile and Luggage scanner



Polygraph Lab



Detention Centre



BEFORE



AFTER

Newly Landscaped and Paved Compound





## ICPC CONTACT ADDRESSES

**ICPC Headquarters: Plot 802 Constitution Avenue, Central Business District P.M.B. 535, Garki, Abuja**

### Adamawa State Office

No. 1 Bachure Road, Pufare Layout  
Jimeta, Yola, Adamawa State.  
State Commissioner: Mr. George Lawal  
Phone: 08034514607  
E-mail: adamawa@icpc.gov.ng

### Anambra State Office

No. 10 Nwakpadolu Street, G.R.A, Agu  
Awka  
Awka, Anambra State.  
State Commissioner: Mr. Godwin Oche  
Phone: 07030428362  
E-mail: anambra@icpc.gov.ng

### Akwa Ibom State Office

Plot 37, G Line  
Ewet Housing Estate  
Uyo, Akwa Ibom State.  
State Commissioner: Mr. Dennis Idoko  
Phone: 08037865494  
E-mail: akwaibom@icpc.gov.ng

### Bauchi State Office

Plot 10946 Yaya Abubakar Link  
Off Federal Secretariat Road  
G.R.A, Bauchi, Bauchi State.  
State Commissioner: Mr. Idris Bello Bakori  
Phone: 08037771263  
Email: bauchi@icpc.gov.ng

### Benue State Office

No. 26 Jonah Jang Crescent  
Nyiman Layout, Opposite FIRS Office  
Makurdi, Benue State.  
State Commissioner: Mr. Tiku Andrew Menge  
Phone: 08166814186  
E-mail: benue@icpc.gov.ng

### Borno State Office

No. 186, Behind NNPC Clinic, Damboa  
Road  
Maiduguri, Borno State.  
State Commissioner: Mr. Idris Ishaku Sakaba  
Phone: 08023220835  
E-mail: borno@icpc.gov.ng

### Delta State Office

No. 7 Barr. Eugene Uzum Crescent, Eagle  
Square  
Off Okpanam Road, Asaba, Delta State.  
State Commissioner: Mr. Edet Ufot  
Phone: 08037866985  
E-mail: delta@icpc.gov.ng

### Edo State Office

No. 13A Delta Crescent, Off Ikpohan  
G.R.A, Benin City, Edo State.  
State Commissioner: Mr. Amefula Agwu  
Phone: 08097520126  
E-mail: edo@icpc.gov.ng

### Enugu State Office

Plot JQ/4  
Bisala Road,  
Independence Layout,  
Enugu, Enugu State.  
State Commissioner: Mr. Kennedy  
Ebhotemen  
Phone: 07037248234  
E-mail: enugu@icpc.gov.ng

### Imo State Office

Plot No. BF/1 Area H  
Opposite Index Filling Station  
Off 40-40 Roundabout, New Owerri, Imo  
State.  
State Commissioner: Mr. Peter Alumbu  
Phone: 08099809631  
E-mail: imo@icpc.gov.ng

### Kaduna State Office

No. 7 Wurmo Road, Badarawa G.R.A.  
Kaduna, Kaduna State.  
State Commissioner: Prince Hassan  
Mohammed  
Phone: 08077985160  
E-mail: kaduna@icpc.gov.ng

### Kano State Office

No. 31 Usmaniyya Link, Railway Quarters  
Abdullahi Bayero Road, Kano, Kano State.  
State Commissioner: Mr. Ibrahim Garba  
Phone: 08032851353  
E-mail: kano@icpc.gov.ng

### Katsina State Office

No. 7 Bayajidda Road, Off Daura Road  
Near INEC Office, G.R.A, Katsina, Katsina  
State.  
State Commissioner: Mr. Mohammed Lawal  
Mahdi  
Phone: 08164402626  
E-Mail: katsina@icpc.gov.ng

### Kogi State Office

500 Units Housing Estate  
Ganaja Road, Lokoja, Kogi State.  
State Commissioner: Mr. Ulu Okoro James  
Phone: 08033133367  
E-mail: kogi@icpc.gov.ng

### Lagos State Office

No. 10 Okotie Eboh Street  
South-West Ikoyi, Lagos State.  
State Commissioner: Mr. Kabir Elelu  
Phone: 08090392021  
E-mail: lagos@icpc.gov.ng

### Niger State Office

No. 1 Azikiwe Road, Behind Radio Niger  
Chanchaga LGA Minna, Niger State.  
State Commissioner: Mr. Zayyana Danmusa  
Phone: 08086621491  
E-Mail: niger@icpc.gov.ng

### Ondo State Office

G.R.A. Block A, Plot C  
Oda Road, Akure, Ondo State.  
State Commissioner: Mr. Kupolati Kayode  
Phone: 08035825773  
E-mail: ondo@icpc.gov.ng

### Osun State Office

No. 5 Olu Alabi Road  
G.R.A, Oke-Fia, Osogbo, Osun State.  
State Commissioner: Mr. Ademola Bakare  
Phone: 08056855258  
E-mail: osun@icpc.gov.ng

### Oyo State Office

Behind CBN Entrepreneurship Skills  
Acquisition  
Opposite Aerodrome, Old Airport Road,  
Samonda  
Ibadan, Oyo State.  
State Commissioner: Mr. Lucky Erewa  
Phone: 08023221385  
E-mail: oyo@icpc.gov.ng

### Rivers State Office

No. 9B, William Jumbo Street  
Old G.R.A.  
Port Harcourt, Rivers State.  
State Commissioner: Mrs. Ekere Usiere  
Phone: 08023510484  
E-mail: rivers@icpc.gov.ng

### Sokoto State Office

Plot 2253, Opposite WAEC Office  
Off Tsafe Road, Sokoto  
Sokoto State.  
State Commissioner: Mr. Garba Tukur Idris  
Phone: 08039170478  
E-mail: sokoto@icpc.gov.ng



[www.icpc.gov.ng](http://www.icpc.gov.ng)

 [www.icpc.gov.ng](http://www.icpc.gov.ng)

 [info@icpc.gov.ng](mailto:info@icpc.gov.ng)

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**TOLL FREE LINES:**

08031230280; 08031230281;  
08031230282; 07056990190;  
07056990191 0800-CALL-ICPC  
(0800-2255-4272)

**SHORT CODE - 4272**