NATIONAL ANTI-CORRUPTION PLAN

2015 - 2019

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PRESIDENTIAL ADVISORY COMMITTEE ON CORRUPTION

Table of Contents

Anti-Corruption and Rule of Law Agencies 3

Economic & Financial Crimes Commission 3

Independent Corrupt Practices Commission 3

Code of Conduct Bureau 3

Code of Conduct Tribunal 3

Nigeria Police Force 3

Nigeria Prisons Service 3

Supreme Court of Nigeria 3

Court of Appeal 3

Federal High Court 3

Executive Summary 4

Introduction 7

Vision 8

Mission 8

Specific Goals 9

Anti-Corruption Action Plan 15

Implementation, Monitoring and Evaluation 45

Abbreviations and acronyms

ACAs	Anti-Corruption Agencies
AGF	Attorney General of the Federation
BPP	Bureau of Public Procurements
CCB	Code of Conduct Bureau
CCT	Code of Conduct Tribunal
EFCC	Economic and Financial Crimes Commission
ICPC	Independent Corruption Practices Commission
NJC	National Judicial Commission
MDAs	Ministries, Departments and Agencies
NPF	Nigeria Police Force
NBA	Nigeria Bar Association
NPS	Nigeria Prisons Service
OSGF	Office of the Secretary to the Government of the Federation
PAC	Presidential Advisory Committee on Corruption

Anti-Corruption and Rule of Law Agencies

Economic & Financial Crimes Commission

Independent Corrupt Practices Commission

Code of Conduct Bureau

Code of Conduct Tribunal

Nigeria Police Force

Nigeria Prisons Service

Supreme Court of Nigeria

Court of Appeal

Federal High Court

Executive Summary

Corruption in Nigeria is an endemic, pervasive and systemic problem, which is now recognized as capable of threatening the very existence of the nation.

Combating corruption is about rebuilding Nigeria's sovereign national wealth and improving the wellbeing of her peoples. While Nigeria is better off than many other countries on the level of natural wealth endowments, she lags behind on virtually all indicators of growth and development and in produced intangible wealth. Many studies have shown that the primary reason for Nigeria's lack of progress since the 1960s has been the failure to combat corruption effectively.

The need to combat corruption and improve governance has been identified by successive governments and the people of Nigeria. As a result, since independence, there have been a vast number of institutions, laws and other initiatives to combat diverse manifestations of corruption. Even successive military administrations, which are generally credited with instituting and institutionalizing the cultures of impunity, had one anti-corruption initiative or the other.

As a result, Nigeria has an impressive array of structures, institutions and laws aimed at combating corruption in addition to the provisions contained in the Criminal Code, and laws of traditional law enforcement agencies in particular the Police. Notably we have the following anti-corruption agencies viz.

1. Independent Corrupt Practices and other Related Offences Commission (ICPC) which is a dedicated anti-corruption agency with broad powers to investigate, prosecute and prevent corruption, and educate the public on and against the malaise.[1]
2. The Code of Conduct Bureau (CCB) and the Code of Conduct Tribunal, which administers and enforces the Code of Conduct for public officers. This Code incorporates issues such as declaration of assets and conflict of interest rules.[2]

[1] Corrupt Offences and other Related Offences Act 2000
[2] Code of Conduct Bureau and Tribunal Act 1988

3. The Economic and Financial Crimes Commission (EFCC) has the mandate to combat financial and other crimes such as Advance Fee Fraud and Credit Card Fraud. The Commission also has the statutory responsibility to enforce the Money Laundering Act and is the designated Financial Intelligence Unit of the country.[3]
4. The Constitution and laws of the Federal Republic of Nigeria also create several other structures and bodies mandated to combat various types of corruption, including the Auditor General's Office, the Public Complaints Commission, [PCC] the Nigerian Extractive Industries Transparency Initiative, [NEITI] and the Bureau of Public Procurement [BPP].
5. There are also laws to regulate issues such as political party financing, auditing of public accounts, fiscal responsibility, etc.

Despite the existence of these laws and institutions, Nigeria still falls short of the standards and requirements of an effective anti-corruption regime as embodied in the international anti-corruption conventions. This strategy document provides a framework to improve the anti-corruption regime in Nigeria focusing on the following key areas of Policy Improvement; Institution Strengthening and Technical Support.

1. Policy Improvement

a) Improved Inter- Agency Co-operation in Fighting Corruption: One of the critical gaps and peculiarity in the national anti-corruption agenda is the poor synergy among the agencies charged with anti-corruption functions, which despite their closely related and even overlapping mandates have hardly coordinated their policies, strategies or operations. This limited synergy results in the overall ineffective, inefficient and occasionally even counterproductive use of the institutional, legal, human and financial resources dedicated by the Nigerian Government and people to preventing and combating corruption.

b) Improved policy objectives to encourage citizens acknowledge the damaging effect of corruption and concomitant conclusion that "integrity pays". Furthermore, major stakeholders such as professional, religious, traditional and other

[3] Economic and Financial Crimes [Establishment] Act 2004 and the Money Laundering [Prohibition] Act 2004

groups who have established, and actively enforced ethical standards that meet best practices within them and who show evidence of efforts to sanitize the conduct of their members will be cultivated.

c) Kick-start and sustain campaign for ethical rebirth in public service delivery, business and society backed by strong government policy and outlined incentives that supports society at large to campaign against sectors that fail to meet best practices in ethical and personal conduct;

2. Institution Strengthening and Technical Support

a) Support to anti-corruption agencies for reliable and credible law enforcement consisting of effective investigation, efficient prosecution, speedy adjudication and effective sanctions. This will also deter further corruption.

b) Collaboration with key arms of government notably the legislature and judiciary towards improving the legal regime for combatting corruption, more efficient judicial enforcement of extant laws especially the Administration of Criminal Justice Act 2015 and reduction in judicial corruption that frustrates prosecution of cases by breaking up the collusion that fosters corruption between the Bar, Bench, institutions and personalities;

c) Reduce gaps and vulnerabilities to corruption in private and public sectors of the economy by instituting an auditable regime of transparency, integrity, and accountability measures;

d) Prioritize assets recovery and management of proceeds of corruption as deterrence and to take away the gains of corruption. In this regard a robust Assets Recovery Framework including non-conviction based assets forfeiture, application of recovered assets, collaboration in mutual legal assistance will be developed using international best practices under the UNCAC framework.

e) Introduced legal framework to protect whistleblowers and reward integrity to encourage citizens align with beneficial outcomes and avoid negative outcomes of corruption.

3. Implementation Monitoring and Evaluation

4. Key Institutions of Engagement

1. The Office of Attorney-General of the Federation
2. Anti-Corruption Agencies and members of the Inter-Agency Task Team but most notably
    a. ICPC
    b. EFCC
    c. Code of Conduct Bureau
    d. Nigeria Police
    e. State Security Services
3. The Judiciary including the CCT
4. Key Regulatory and Public Service Agencies such as CBN and BPP
5. Professional Bodies notably Nigerian Bar Association
6. Financial Services Sector notably the banks
7. National Orientation Agency, Public Complaints Commission, Religious Bodies and key Civil Society Organizations.

Introduction

While several structures, institutions, laws and initiatives to promote public accountability and fight corruption have been introduced since the return to civilian rule in 1999, the investments made by successive Governments in the fight against corruption are yet to deliver on the objective of effectively preventing and combating corruption in the management of public resources and public affairs.

Nigeria, despite all efforts, continues to fall short of the standards and requirements of an effective anti-corruption regime as embodied in regional and global anti-corruption conventions, in particular the United Nations Convention against Corruption (UNCAC), which Nigeria ratified on the 14th of December 2004.

A key challenge affecting the fight against corruption in Nigeria is the limited interface and cooperation amongst the agencies charged with anti-corruption functions which in spite of closely related and even overlapping mandates, seldom coordinate policies and operations.

Anti-corruption fight must be a country project and not simply a project of the federal government. Unlike what currently obtains, where it appears that anti-corruption is a federal government agenda, State governments need to also take up the responsibility of fighting corruption at the State levels. Private organizations, individuals and even religious bodies must be involved in the fight against corruption - the current reality is that the media, churches and other private institutions are complicit.

With the clear objective of changing the logic of corruption and anti-corruption in Nigeria, the National Strategy adopts an approach based on five pillars basing action on the solid foundation of prevention; enforcement and sanctions; public engagement; ethical re-orientation in the public and private sectors and the society at large; and Recovery and Management of Proceeds of Corruption. It proposes interventions at the policy, technical and institutional levels and aligns the objectives in the fight against corruption with major government policies, in particular vision 20: 2020 and the Millennium Development / Sustainable Development Goals (SDG), and hereby promises to remove major blockages preventing Nigeria from achieving its development objectives.

Vision

A Nigeria free of corruption; where prevails the rule of law, ethical values, equity and inclusion to enable economic, social and human development.

Mission

To implement a holistic National Strategy to Combat Corruption which will give an entry point to all sectors and all Nigerians in the fight to combat corruption.

Specific Goals

- *To institutionalize the fight against corruption*
- *To get citizens to own the anti-corruption fight so that they hold public officials to account*
- *To bring the fight against corruption to all levels – local, State and federal governments.*

The Strategy

The strategy is designed to intervene at the policy, technical and institutional levels and within private sector and society. While at the policy level the ultimate objective is to put into place a system which promotes an increased alignment of private and public interest, at the Institutional level the strategy aims to strengthen the effectiveness, efficiency and synergy of the institutions, laws and measures designed by the Nigerian Governments (Federal & State) to prevent and combat corruption as well as to engage the public more actively in the process. The strategy seeks to develop and implement mechanisms aimed to improve the governance of the public institutions at Federal, State and Local government levels and to remove corruption related factors inhibiting their accessibility and capacity to deliver quality services to all Nigerians. At the level of private sector and society at large the Strategy seeks to promote the establishment of ethical standards, where they do not exist and the improved enforcement of such standards where they exist. The Strategy promotes ethical orientation for improved personal ethics and ethical conduct in nation building which will guide citizens from the *cradle to the grave*. The strategy, at each level will be interlaced with a monitoring and evaluation component designed to ensure effective prioritization of mandates, synergy and collaboration as well as adequate public engagement.

Policy Objectives

Policy Objectives reflect the government's high level intended benefits for reducing corruption in society. The bottom line is in enacting policies that encourage all citizens not only to acknowledge the damaging nature of corruption but also to

conclude that “integrity pays”. The policy framework around reducing corruption must show clear tangible benefits for staying away from corruption as well as stiff negative consequences for engaging in corrupt acts. The incentives offered by government must encourage citizens to align themselves with beneficial outcomes and avoid the negative outcomes.

Fear, Apathy & Ignorance exacerbate the erosion of our value system and standards. When this occurs, formal and social controls against corruption start to break down and social tolerance for the malaise increases. This leaves many willing to stand by and watch, even admire those acting with impunity without attempting to put an end to the misbehavior. As people succeed in taking undue advantage of the system and sanctions prove ineffective, perverse incentives begin to grow, creating greater demand for corruption and institutionalizing the rampant negative behaviors observed.

Where there is no real incentive to do the right thing (or perverse incentives exist) combating corruption is an extremely challenging endeavor. The National Strategy assumes an environment in which efforts are being made to achieve better alignment between social, private and public interests through the instrumentality of the budget, public recognition and public vigilance among others.

The system should enshrine a matrix to measure corruption risk and vulnerabilities as well as incentives for reduced risks of corruption. Consequently:

- Public institutions drawing funds from the budget should not be corruption risks. Those with high corruption risks should be more closely monitored, while those with lower corruption risks should be given more incentives.
- Sub-national levels of government seeking a federal guarantee to raise finance should not be high corruption risks.
- Private companies seeking to participate in public procurement or do business with Government should not be high corruption risks.
- Companies seeking government loan guarantees or access to grants and subsidies must also not be high corruption risks.

- Civil Society Organizations engaging with Government should not constitute high corruption risks.

"Governments at all levels as a matter of policy will count as its major stakeholders only professional, religious, traditional and other stakeholder groups who have established, and actively enforce ethical standards that meet best practices within them and who show evidence of efforts to sanitize the conduct of their members". Government shall not tolerate professional, religious, traditional or other groups that continue to reward ill-gotten wealth or accept persons accused of corruption into their leadership or participate in any way in protecting corrupt persons, and will encourage society at large to actively identify and condemn such groups.

Public Recognition

The strategy will promote public recognition of those public, private, professional or social organizations as well as individuals who act against corruption.

As concerns public institutions as well as private corporate bodies, such recognition will be vested in those who take extra ordinary steps and succeed in minimizing corruption in their internal and external dealings as well as in establishing mechanisms and procedures aimed to detect and effectively and transparently sanction corrupt behavior.[4]

For individual citizens as well as civil society organizations, special efforts in the promotion of anti-corruption and integrity as well as in the reporting of cases of corruption will be encouraged. This requires reviewing the current system of national honours to include integrity and specific efforts in the fight against corruption as criteria in the selection of the recipients of such honors.

For any public recognition policy to be effective, it must be relatively easy to identify compliance and relatively easy to detect a fraud. The system to identify the institutions, corporate bodies and individuals must thus be simple, transparent,

[4] For public institutions, it will be the responsibility of Federal and State Governments to determine the form of recognition as well as system for identifying deserving institutions. For the private sector, possible incentives could include special consideration in a tendering process; special tax rebates and deductibility of costs incurred for anti-corruption measures implemented by the company (e.g. establishment and operation of whistleblower hotlines, staff training on professional ethics and anti-corruption, etc.).

credible and easily understood and checked by the public. At the same time, the public must have the means to report any abuses. Therefore, the selection mechanism would be accompanied by an independent public feedback mechanism, which the public uses to give feedback about government, private sector or civil society organizations and individuals as necessary.

Institutional Objectives

At the technical level, the strategy focuses on the effectiveness and efficiency of interventions and systems, laws and administrative, organizational and institutional arrangements used by Governments at Federal, State and Local government levels in combating corruption, as well as the active engagement and participation of the public in these mechanisms and systems. The technical objectives aim to:

- Improve public confidence in reliable enforcement of the law, consisting of effective investigation, efficient prosecution, speedy adjudication and effective sanctions;
- Reduce gaps and vulnerabilities to corruption in private, public and social organizations of the Nigerian society by instituting an auditable regime of transparency, integrity, and accountability measures;
- Breaking up the collusion that fosters corruption through public engagement and involvement at all levels of private, public and social organizations of Nigerian society;
- Kick off and sustain a campaign for ethical rebirth in business and society backed by strong government policy and outlined incentives that supports society at large to campaign against businesses, groups and individuals who fail to meet best practices in ethical and personal conduct;
- Prioritize the Recovery and Management of Proceeds of Corruption as a deterrence and to take away the gains of corruption

For success, the impacts of the National Strategy are designed to be scalable and sustainable. Rather than discreet, one-off interventions, the strategy makes the interventions a part of the way we do things in Nigeria: part of our customs and way

of behaving. Rather than focus only at the National level, the strategy flows down to sub-national levels; it takes short-term measures as well as builds necessary long-term responses that encourage institutional change.

Technical Objectives

At the technical level, the objective is to improve public confidence in reliable and credible law enforcement consisting of effective investigation, efficient prosecution, speedy adjudication and effective sanctions.

To understand the successes, challenges, constraints and possible remedies related to enforcement and sanctions, consultations were held with experts from various relevant agencies involved in the investigation, prosecution, adjudication and sanctioning of corruption and related offences[5]. The problem identification also drew from the conclusions of the Corruption Casework Policy Roundtable, held by the National Judicial Institute and bringing together several judges designated to handle cases of ICPC and EFCC in the State High Courts and the Federal High Court, as well as representatives of the prosecutions and investigations departments of ICPC, EFCC and CCB.[6]

In terms of the inhibiting weaknesses that are currently hampering the effective reliable and effective law enforcement in cases of corruption, the problem analysis identified the following as the key contributing factors:

- Lack of effective investigations due to weak skill sets, limited resources and weaknesses in case selection and management
- Lack of capacity for efficient prosecution due to limited numbers of prosecutors, lack of sufficient training, and difficulties to attract the required numbers of competent and committed candidates to join the legal departments of the ACAs.

[5] NDLEA, NFIU, CCB, BPRS, ICPC, EFCC, NDLEA, Police, NAPTIP, NEITI, FIRS, NOA/Ministry of Information, Ministry of Justice, Nigeria Customs, Nigeria Immigration Service, and the Human Rights Commission
[6] The communiqué of the roundtable is attached in Annex 3

- Weaknesses in the **Legal Framework,** including shortcomings in the Evidence Act and the Criminal and Penal Procedure Acts, as well as absence of specific laws on Whistleblower and Witness Protection and the recovery of Proceeds of Crime
- Weaknesses as concerns organization, procedure, human resource management, motivation and incentives in the operational departments of anti-corruption law enforcement bodies.
- Limitations in the independence of the leadership of ACAs, including issues such as a perceived self-censorship, and insufficient security of tenure.
- Lack of Interagency coordination and synergy of investigation and prosecution.
- Slow dispensation of justice due to capacity limitations (skills, infrastructure, and equipment) and cumbersome procedures and antiquated laws.

In order to address these multiple challenges, the retreat, and subsequent expert consultations identified a host of short, medium and long term measures. These are aimed at addressing these weaknesses, assisting in particular the anti-corruption law enforcement agencies, the Ministry of Justice and Office of the Attorney General, the Judiciary and the Legislature and thereby creating the conditions for improving public confidence in reliable and credible law enforcement consisting of effective investigation, efficient prosecution, speedy adjudication and effective sanctions.

Anti-Corruption Action Plan

Focus	Activity	Implementing Agency	Comments	Timeline
Anti-Corruption Agencies: General	• FGN to come out with policy position on merger of ICPC, EFCC, CCB and CCT • Training for personnel of anti-corruption agencies • Improve institutional capacity through organizational reform, human resource management, policies, procedures, practices, investigative skills, etc. • Strengthen coordination,	• The Presidency • Office of Attorney-General of the Federation • Presidential Advisory Committee on Corruption (PAC) • ACAs		

	cooperation and synergy of law enforcement action, particularly by setting up a multiagency platform for coordination in investigation, prosecution and intelligence sharing.			
Anti-Corruption Agencies: Code of Conduct Bureau & Code of Conduct Tribunal	• Increase number of judges at the Code of Conduct Tribunal • Remodel the CCT into an Anti-Corruption Court and make it a superior court of record • Restructure the CCB to work with other anti-corruption agencies and asset investigation units • Ensure the publication of declaration of assets	• Presidency and National Assembly • Attorney-General of the Federation • Presidential Advisory Committee on Corruption	Requires constitutional amendment	
Appointment of Public Officers	• Ensure that the appointment of public officers complies with the relevant laws.	• Presidency • Attorney General of the Federation		

	• Encourage CSOs to scrutinize both the personalities and relevant provisions of the law in each instance. • Ensure that oversight bodies/personnel effectively perform their oversight roles in respect of such appointments			
Audit of Public Bodies	• Ensure the annual audit of all revenue generating bodies. • Publish reports of the annual audits. • Establish the following rules with respect to audits: - Audit firms engaged by the FGN should not be allowed to include a caveat that their reports cannot be relied upon. - Auditors should discontinue audits where the organization in view refuses to cooperate	• Presidency • Attorney General of the Federation • Auditor General of the Federation • Relevant committees of the National Assembly		

	with the auditor by failing to produce relevant documents. - Failure to produce documents required for audit should be referred (by the auditor) to the Attorney General of the Federation for appropriate action. - Failure to make documents available to auditors should be made an offence under the appropriate laws.			
Assets Investigation and Investigation	• All incoming and outgoing public officers to declare assets • Investigation of declared assets • Prosecution for illegitimate acquisition of assets • Simplify and modernize by use of technology the process for declaration and monitoring of assets declared • Proactive recovery of	• Code of Conduct Bureau • Asset Investigation Unit of Anti-Corruption Agency (in partnership with Revenue agencies, Banks, Lands Bureau, Vehicle registration agencies and other relevant agencies) • ICPC • EFCC • Code of Conduct Tribunal		

	stolen assets • Appropriate existing legal framework for civil forfeiture in the interim, particularly under the Banks Employees Declaration of Assets Act, 2004 and the ICPC • Prioritizing the enactment of the Proceeds of Crime Act and Whistle Blowers Act • Setting up a multi-agency task force to develop specialized competencies in the recovery of stolen assets.	• Presidential Advisory Committee on Corruption (PAC)		
Banking Industry	• Tighten security to monitor fraudulent transactions and money laundering transfers. • Enforce the Bank Employees, Etc. (Declaration of Assets) Act which requires bank officials to declare their assets every year. • Extend the scope of the Bank Employees, Etc. (Declaration of Assets)	• Central Bank of Nigeria • NFIU • Attorney General of the Federation • Secretary to the Federal Government	Bank staff connive with politicians and criminals to commit these crimes. This law is also applicable to CBN and Customs officials	

	Act to other bodies.			
Judiciary: Judges	• Review the recommendations made by some of the reports of panels set up to address the issues with the judiciary. Some of these include: - Uwais Report; - Musdapher Report.	• Attorney General of the Federation • CJN • NJC		
	• Designate incorruptible judges to hear corruption cases in accordance with the Administration of Criminal Justice Act of 2015. • identified judges should be thoroughly screened before being designated. • Provide adequate security for the designated judges.	• Chief Justice of Nigeria • Attorney General Federation • National Judicial Council • Presidential Advisory Committee on Corruption • State Department	To attend solely to corruption and financial crime cases in accordance with Administration of Criminal Justice Act 2015	
	• Building judicial institutional capacity through organizational reform, human resource management,	• National Judicial Council • State Judicial Service Commissions • Attorney-General of the Federation • Attorneys-General of the		

	policies, procedures, practice directions, case management skills, etc. • Judicial capacity building should be structured for maximum value • Prohibit completely the practice of entire state judiciary going abroad for annual retreats at humongous cost that could be applied to improving infrastructure in the judiciary	States • PAC	• Constant Judicial capacity building is to be encouraged to keep judges abreast of developments in law • Money spent by state judiciaries on such annual retreats can be better applied for improved service delivery.	
	Lifestyle audit of judges and Politically Exposed Persons (PEP)	• Judicial Service Commissions (Federal and State) • National Judicial Council (NJC) • Nigerian Financial Intelligence Unit	The audit should cover their family members, close friends, support staff and political associates	

		• ICPC • EFCC • State Security Service • Code of Conduct Bureau • PAC		
	Revive all pending criminal/ corruption cases against PEPs and judges and prosecute speedily and vigorously.	• EFCC • ICPC • Attorney General of the Federation in collaboration with PAC		
	Review the code of conduct for judges.	• NJC • NJI • Attorney General of the Federation		
	Impose sanctions on lawyers and litigants who deliberately stall and frustrate the judicial process.	• Attorney General of the Federation • Nigerian Bar Association • Body of Benchers • Judiciary to be encouraged to refer such for disciplinary action		
	The President and Vice-President to hold meeting with key players in the justice sector to solicit buy-in into the anti-corruption agenda.			
Judiciary: Judges' Welfare	Ensure that Judges	• National Judicial		

	undergo yearly medical check-ups and submit reports to a body or department of the NJC official designated for this.	Council • Judicial Service Commission • Attorney General of the Federation • State Attorneys General		
	• Encourage petitions from lawyers with respect to the ability of a judge to physically and mentally perform his/her tasks. • Judges who perform below expectations shall be required to undertake medical check-up. • All medical check-ups must take place in Nigeria, except where a foreign trip becomes absolutely necessary.	• National Judicial Council • Judicial Service Commission • Attorney General of the Federation • State Attorneys General	The National Health Act,2014 prohibits foreign trips for medical check-up except on recommendation of a Medical Board that treatment is not available locally	
	• Design a minimum standard for judges' welfare across the country	• National Judicial Council • Judicial Service Commission		

	• Make adequate housing provision for judges • Ensure that vehicles used by judges are properly maintained and changed every 4 years	• Attorney General of the Federation • Attorney General of States		
	Establish a mechanism to reward judges that perform outstandingly well.	• National Judicial Council • Judicial Service Commission • Attorney General of the Federation • State Attorneys General	A bonus equivalent to the quarterly salary to the judge is the recommended bonus. This should be payable by the State or the Federal Government as the case may be.	
Judiciary: Support Staff	• Establish a Code of Conduct for judicial support staff. • Ensure mandatory declaration of assets for support staff of judges. • Activate lifestyle audit of support staff alongside with judges. • Implementation of mechanism (s) to ensure constant	• Code of Conduct Bureau • National Judicial Institute • National Judicial Council • State Judicial Service Commissions	It is important to keep the support staff of judges under scrutiny because it has been observed that corrupt judges often collude with their support staff.	

	oversight of judiciary support staff			
Judiciary: Quality of Judgement	• Actively encourage members of the Bar and academics to write/publish opinions on judgments of courts. • Ensure access to adequate libraries. • Ensure that the libraries of all judges are kept up to date. • Provide access to online databases such as Lexis, Westlaw, Law Pavilion and LegalPedia. • Set deadlines for the release of the record of court proceedings. • Incorporate practice directions for fast tracking sensitive cases into	• National Judicial Council • Judicial Service Commission • Attorney General of the Federation • State Attorneys General • Heads of Courts • Nigerian Bar Association • PAC • National Association of Law teachers	Lawyers need to question the reasoning of judgment delivered	

	the main rules.			
	Monitoring the performance of courts through the introduction of professionals and timely dissemination of reports.		When reports are not forthcoming from a particular court, this reveals a performance decline in the court.	
	• Engage and ensure the use of verbatim reporters for courts. • Conduct periodic judicial performance evaluation using modern evaluation tools and technology		This will help address the practice of corrupt judges who sometimes exclude certain information from their judgments and records of courts. Lawyers should be given access to these records. Evaluation should be done not just by judges but also by lawyers and litigants	
		•		
		•		
Judiciary: Court Administration	• Withdraw administrative roles from the portfolio of Chief Registrars and hand this over to professional court administrators. • Ensure digital archiving of documents in court registries. • Deploy technology for	• Chief Justice of Nigeria • National Judicial Council • Judicial Service Commission • Attorney General of the Federation • State Attorneys General		

	court management and performance evaluation • Implement transparency and accountability in handling funds received, procurement and projects. • Implement independent audit of the judiciary's account and ensure the judiciary accounts for its funds transparently • Set strict deadlines for the release of record proceedings. • Employ professionals as Court administrators. • Make facilities for documenting the proceeding of courts run independently of the court	• Heads of Courts • Nigerian Bar Association		
	• Conduct periodic audit of the judiciary's account. • Publish the budget and expenditure of the judiciary.	• State Auditor General • Auditor General of the Federation • National Judicial Council • Judicial Service Commissions	This action will help improve transparency and curb corruption in the judiciary and effective use of funds	
Judiciary: State Judicial	• Organize conferences	• Chief Justice of Nigeria	If the JSCs are fully	

Service Commissions	and workshops for the members of the JSC aimed at improving the performance of their oversight functions. • Ensure that members of the JSC operate on a full time basis, as opposed to the current part time trend. The functions of a member of a JSC are to be performed as a full time role. • Appoint senior/retired lawyers of integrity to the JSCs.	• Heads of Court • Attorney General of the Federation • State Attorneys General	functional, it will significantly reduce administrative functions being performed by the heads of courts.	
Judiciary: Court of Appeal	• Ensure the circulation of judgments amongst all divisions by electronic means. • Provide computer appreciation training for all Justices of the Court of Appeal.	• DCR of every division should be responsible for the manual and electronic dissemination of judgments. • Chief Registrar	To address the issue of conflicting judgments amongst the Justices of the Court of Appeal.	

Judiciary: Supreme Court	• Expand the Supreme Court to its maximum as provided by law • Ensure that female justices maintain the state of origin declared at the point of entry into the judiciary.	• Presidency • Nigerian Judicial Council • Attorney General of the Federation		
	• Reduce the jurisdiction of the Supreme Court • Review the grounds for granting leave to appeal to the Supreme Court • Ensure election petition cases are treated on merit and rulings on interlocutory applications are avoided. • Establish mechanisms to avoid undue elongation of appeals.	National Assembly (Constitutional Amendment)	Short adjournments are recommended for election petition cases. It should be made a matter of practice	
Judiciary: Appointment of Judges	• Encourage contributions and opinions from outside the Bench with respect to the competence of judicial appointment nominees. • Make judicial appointments from outside the Bench.	• Presidency • National Judicial Council • State Judicial Service Commissions • Nigerian Bar Association	References to be made to Justice Uwais Report on how to appoint judges Emphasis should be on appointing the best from the Court of Appeal, not the most senior.	

	• Ensure that the appointment of judges is based on merit and not on seniority at the Court of Appeal. • Ensure that female judges maintain the state of origin declared at the point of entry into the judiciary.			
	• Make computer literacy a precondition for the appointment of judges • Review, modernize and publicize judges' performance appraisal and performance • Make appraisal forms accessible to the public in line with the FOI Act. • Ensure transparency in the appointment of Heads of Courts	• National Judicial Council • Judicial Service Commission • Attorney General of the Federation • State Attorneys General	Computer literacy will ensure that the judges type their judgments by themselves, and reduces the access of court staff to judgments and closes avenue for corruption amongst the court staff	
Leaner Government	• Public officers should fly economy on commercial flights with exceptions clearly designated by the OSGF • Cut down on expenditure such as feeding budget and	• Presidency • Attorney General of the Federation • Presidential Committee on Corruption • CCB		

	reduce the presidential fleet by selling as many of the planes as possible with a view to retaining only such number as required by operational exigencies. • Publish salaries of all public servants. • Take gender equality into consideration in ministerial and other appointments • Reduce foreign trips for Government officials, and place a ban on sponsorships for pilgrimage and unnecessary foreign conferences • CCB to designate Integrity Officers into key MDAs			
Mutual Legal Assistance	• Attend to requests for assistance by countries which Nigeria has Mutual Legal Assistance arrangement with.	• AGF • PAC • ACAs	This will help send out a strong signal that the government will not shield anyone from the law.	

	• Actively cooperate with countries for the purpose of recovering Nigeria's stolen wealth.			
Nigeria Bar Association : General Provisions	• Establish and publish a disciplinary mechanism to deal with inappropriate conduct of lawyers, particularly with respect to the issue of deliberately stalling court proceedings • Encourage judges to recommend unscrupulous lawyers for discipline	• Nigerian Bar Association • Federal and State Attorneys General	Nigerian Bar Association is required to take the discipline of lawyers seriously, particularly those lawyers who deliberately stall and frustrate court proceedings	
	• Pending criminal cases against lawyers should be prosecuted	• Attorney-General of Federation • ICPC • EFCC		
	• Prescribe professional fees for lawyers who handle government cases in order to curb arbitrary legal charges/fees	• Attorney General of the Federation (in exercise of his powers under the Legal Practitioners Act)		
	• Encourage members to write opinions on the judgments of courts	• Nigerian Bar Association	The NBA must be actively involved in the process of tackling judicial corruption	

	• Publish report on judges			
Nigeria Bar Association: Appointment of Senior Advocates (SANS)	• Review the process of appointing Senior Advocates of Nigeria to further eliminate persons of dubious character from being conferred • Enforce the guidelines recommended for the conduct of SANs by the Legal Practitioners Committee.	• Legal Practitioners Privileges Committee • Attorney General of the Federation • Nigerian Bar Association •		
Nigeria Police Force	• Establish a crime data register, which would contain the status of all criminal cases at any given time. • Include the Nigeria Police in the Concurrent Legislative List of the Constitution to allow the States have greater control over the recruitment, training and deployment of police officers.	• National Assembly (Constitutional amendment) • Attorney General of the Federation • Minister of Internal Affairs • State Attorneys General		
	• Building institutional capacity through organizational reform, human resource	• Presidential Advisory Committee on Anti-Corruption • Nigeria Police		

	management, policies, procedures, practices, investigative skills, etc. • Strengthening coordination, cooperation and synergy of law enforcement action, particularly by setting up a multiagency platform for coordination in investigation and prosecution. •			
Nigeria Prisons Service	• Move prisons to the Concurrent Legislative List - to allow for greater State involvement	• National Assembly (Constitutional Amendment) • Attorney General of the Federation		
	• Review conditions for granting Federal and State pardon • Establish a fingerprints database for convicts.			
	• Building institutional capacity through organizational reform, human resource management, policies, procedures, practices,	• Presidential Advisory Committee on Anti-Corruption • Nigerian Prisons Service		

	skills, etc.			
Presidential Advisory Committee on Corruption	• Establish a Presidential Committee on Anti-Corruption to coordinate FGN anti-corruption reform effort, action plan and ensure synergy in work of anti-corruption agencies; Drive the passage of all pending anti-corruption and justice sector related legislation; Monitor implementation of action plan and conduct evaluation of impact; Work closely with Office of Attorney-General of the Federation to improve criminal justice administration of corruption cases and strategy; Design assets recovery plan and monitor its implementation	• Presidency		
Office of Attorney General: Looted Funds	Institute actions to recover looted funds including against foreign banks	• Attorney General of Federation • PAC to monitor		

	where looted public funds have been lodged in violation of KYC principles for recovery, damages and interest.			
Office of Attorney General: Pension	Investigate and prosecute the mismanagement of pension funds	EFCC Attorney-General of the Federation		
Office of Attorney General: Security Votes	Ensure that all public funds, including security votes are accounted for.	Presidency		
Office of Attorney General: Constituency Projects	• Engage with legislature towards eliminating "Constituency Projects" • Publish funds already appropriated for on going "constituency projects"	• Presidency • Attorney General of the Federation • BPP • Publicity by FOI Action		
Office of Attorney General: Handling of Funds	Collaborate with relevant ministers, institutions and persons to restrict contact of MDAs with funds for public projects.	• Attorney General of the Federation • Federal Minister of Finance • Accountant General of the Federation • Presidential Committee on Anti-Corruption		
Office of Attorney General:	The sale of all federal	• Presidential Committee		

Sale of Public Assets	government assets should be reviewed for propriety and compliance with due process.	on Anti-Corruption • Bureau of Public Enterprises • Bureau for Public Procurement		
Office of Attorney General: Cases pending against the Federal Government	Review all contract and consultancy liability cases pending against FGN to ascertain collusion or conspiracy to use such cases to siphon public funds	• Attorney General of the Federation • Presidential Advisory Committee on Corruption		
Office of Attorney General: Dollarization of the Economy	Collaborate with relevant regulatory agencies to put an end to dollarization of the economy by prosecuting offenders. Bureaux De Change must show records of all transactions and the CBN must regulate them.	• The Central Bank of Nigeria • Attorney General of the Federation	Section 20 of the Central Bank of Nigeria Act criminalizes the refusal of any person to accept the Naira as a legal tender.	
Office of Attorney General: State briefs to be handled by Counsel	• Develop capacity of state counsel to handle all state briefs. • Establish strict criteria for ascertaining which state briefs should be outsourced to private lawyers. • Set a maximum limit for the fees payable for	• State Attorneys General • Attorney General of the Federation • PAC	Only cases the MOJs lack the capacity to handle should be outsourced.	

	such outsourced briefs.			
Office of Attorney General: Ghost Workers	Permanent Secretaries and Heads of institutions that have been named as having ghost workers should be made to account for funds paid to ghost workers under their watch as part of assets recovery campaign of FGN	• Attorney-General of the Federation • Minister of Finance • ACAs • Presidential Advisory Committee on Corruption		
Office of the Attorney General: Damages awarded against Government	Government officials whose actions attract damages and fines against FGN should be held liable for the payment of such damages or fines.	• Federal and State Governments • Attorney General of the Federation • State Attorneys General		
Respect for Public Service & Dignity of Persons*:* ***Award of National Honour***	• Establish strict criteria for granting National Honours. • Establish a record/hall of fame for awardees of National Honours. • Design a criteria for withdrawal of national honour • Establish reward mechanism for integrity and stance against corruption	• Presidency • OSGF	• The indiscriminate award of National Honours should stop. • National Honours should only be given to those who have distinguished themselves in the service of the country and who by their outstanding performance and patriotic duty have brought honour to the country. • The award of National Honours need not be an	

			annual ceremony.	
Respect for Public Service & Dignity of Persons: *National Heroes*	• Implement the provisions of the Heroes Registers Act. • Ensure that any soldier who dies in war is given a hero's funeral and their families should be treated with dignity. • Inform the families of fallen soldiers of the death, before the announcement is made to the public.	Federal Government		
Respect for Public Service & Dignity of Persons: *Respect for Public Service*	• Ensure that no serving public officer is sacked on air. • Accord privileges to war veterans and elder statesmen.	Presidency		
Respect for Public Service & Dignity of Persons: *The Immigration Recruitment Saga*	• Establish a memorial in front of the stadium where many applicants died. • At the memorial ceremony, the government should announce its agenda/policy for tackling the unemployment	• Federal Government • Presidential Committee on Anti-Corruption (for investigation and Prosecution)		

	situation. • The funds raised (700 million Naira) from that recruitment exercise should be accounted for. • Prosecution of anyone found culpable.			
Restructuring of Federal Agencies	Restructure key federal agencies to better enable them achieve their objectives and for more effective cooperation and coordination with other law enforcement agencies. These include: i. State Security Service (SSS) / Department of State Services (DSS) ii. National Drug Law Enforcement Agency (NDLEA) iii. National Agency for Food and Drug Administration and Control (NAFDAC) • All security agencies and agencies within the criminal justice sector	• Presidency • Attorney General of the Federation		
Restructuring Regulatory	• Appoint persons of	• Presidency	Regulatory bodies can be	

Bodies	integrity as heads of regulatory bodies. • Improve confidence of regulatory bodies to perform their functions by limiting political interference • Monitor and conduct corruption risk assessment within regulatory bodies • All laws regulating regulatory bodies need to be reviewed with a view to making them more functional. Such bodies include: i. Nigerian Civil Aviation Authority (NCCA) ii. Nigerian Electricity Regulatory Commission (NERC) iii. Central Bank of Nigeria (CBN) iv. Nigerian Communications Commission (NCC) v. Consumer Protection Council (CPC)	• Attorney General of the Federation • OSGF • Presidential Advisory Committee on Corruption	used to curb corruption in the private sector. This will largely depend on the quality persons appointed as head of these bodies.	

	vi. Standard Organization of Nigeria (SON) vii. Securities and Exchange Commission (SEC).			
Relevant Laws & Bills	• Ensure passage of laws relevant to anti-corruption. These include: (i) Proceeds of Crime Bill; (ii) NFIC Bill; and (iii) Mutual Legal Assistance Bill. (iv) Witness protection Bill (v) Money Laundering (Prohibition and Prevention) Bill	• Presidency • National Assembly		
	• Encourage states to domesticate relevant federal laws such as: Freedom of Information Act Fiscal Responsibility Act Public Procurement Act •	• Governors • State Houses of Assembly • Presidential Advisory Committee on Corruption	• Domestication of relevant laws by states would be made a pre-condition for access to federal funds and support. • Domestication of relevant laws by states would be made a pre-	

			condition for Federal Government to guarantee States' access to funds in the capital markets.	
Relevant Laws & Bills	Review and strengthen the Money Laundering Act and the Public Accounts Committee Act	Attorney General of the Federation		
Prevention of Corruption Generally	• Carrying out Sector Risk Based Approach and Methodology (SRBAM) to enable MDAs improve controls by: - Discovering their vulnerability to specific corruption risks/schemes - Discovering adequate procedures for mitigating risks/schemes - Discovering their status against required adequate procedures - Provision of policy to incentivize closure of gaps and	• Presidential Advisory Committee on Anti-Corruption • MDAs • Public Service Commission • National Orientation Agency • Public Complaints Commission • AGF • NOA		

	vulnerabilities discovered in controls. • Piloting the SRBAM in such sectors as the Police, petroleum, customs and electoral sectors. • Establishment of a common anti-corruption hotline or call centre and one-stop information and public feedback centre. This platform must be conducive for safe reporting of complaints. • Enforcement of the guidelines for compliance with FOI Act issued by the AGF's Office. • Design a campaign for the promotion of an ethical rebirth and national re-orientation.			

Implementation, Monitoring and Evaluation

The responsibility for implementation of the anti-corruption action plan rest on the President, Commander-in-Chief of the Armed Forces.

This responsibility is devolved by the President on the Anti-corruption Agencies, (ACAs), the MDAs, and the Presidential Advisory Committee on Corruption to oversee, monitor and evaluate in line with its Terms of Reference. Under the President's leadership, MDAs but especially the ACAs will plan and execute individual reform measures.

The monitoring and evaluating component will be designed to facilitate judicious allocation and use of resources and maximization of synergy among the ACAs and MDAs. Objective Verifiable Indicators [OVI] will include interventions to address issues such as overlapping mandates, prioritization and allocation of internal resources, inter-agency cooperation and collaboration.

Non-state actors will be encouraged to also monitor and implementation and to evaluate the effectiveness of the action plan.