

# NIGERIA

## Public Service Reform

### ORGANIZATIONAL INTEGRITY AND STRATEGIC CORRUPTION CONTROL

HIGH LEVEL EXECUTIVE TRAINING SHOP  
FACILITATED BY TIRI  
(GOVERNANCE-ACCESS-LEARNING NETWORK)  
SEPT. 2004

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## REPORT

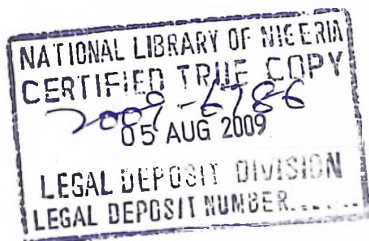
**BPSR**  
BUREAU OF PUBLIC SERVICE REFORMS  
THE PRESIDENCY  
FEDERAL REPUBLIC OF NIGERIA

BUDGET MONITORING AND  
PRICE INTELLIGENT UNIT  
[ BMPIU ]  
FEDERAL REPUBLIC OF NIGERIA



**Organizational Integrity  
and Strategic Corruption Control**

Proceedings of a High-Level Executive Training Workshop  
*Facilitated by TIRI (Governance-Access-Learning Network) and  
Organized by Bureau of Public Service Reforms (BPSR)  
in collaboration with  
Budget Monitoring and Price Intelligence Unit (BMPIU),  
The Presidency, Abuja, 11 - 13 September, 2004*





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#### **Mission Statement**

Facilitating governance reforms as change agent for the Nigerian public service to work for the people in the best tradition of globally cherished values.

#### **Vision Statement**

An integrity- and merit-based professional public service, driven by national interest and efficient management of resources and talents.

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Official positions, very often, constitute pressure points for the integrity of public officers, but this is a challenge that can be managed. When however, public officers themselves constitute pressure points for the integrity of their offices, as it was increasingly the case in recent past, then the nation is in crisis.

**Goke Adegoroye, Ph.D**  
**Director-General**  
**Bureau of Public Service Reform (BPSR)**  
**11 September, 2004**

Corruption is anti-development and anti-society, the holy books are against it (Ecclesiastes 7:7; Surah 83:1-2). To make progress, we must all become change agents. The civil service has a vital role to play; if it fails, a revolution that will sweep it out may ensue... Integrity Tests will henceforth form one of the benchmark criteria for appointment and promotion to top level positions.

**Chief Olusegun Obasanjo, GCFR**  
**President, Federal Republic of Nigeria**  
**13 September, 2004**



## FOREWORD

Until recently, corruption and its attendant social vices ravaged the Nigerian landscape uninhibited. The determination of the administration of President Olusegun Obasanjo, to confront this evil under its policy of zero-tolerance for corruption, was confirmed beyond doubt in a 3-pronged attack with the establishment of the Independent Corrupt Practices and other related offences Commission (ICPC), the creation of the Economic and Financial Crimes Commission (EFCC) as well as the reinvigoration of both, the Code of Conduct Bureau (CCB) and the Code of Conduct Tribunal (CCT), in order to effect a total siege on the malaise. Additionally, the establishment of the Budget Monitoring and Price Intelligence Unit (BMPIU), provided the inbuilt bureaucratic checks to the cankerworm in the public service, as the procurement process that hitherto existed in the public service had been turned to a drainpipe in the system.

Corruption, in the words of President Olusegun Obasanjo, is anti-development. Indeed, much of the excruciating poverty and declining living standards in Nigeria over the years, are the visible effects of corruption which has permeated virtually all aspects of our national life. The malaise is attributable to the gradual perversion of values in the Nigerian society, fuelled by mass-disorientation towards a growing culture of primitive accumulation and glorification of ill-gotten wealth, under pervasive, predatory and survivalists tendencies. The result was Nigeria's poor rating by Transparency International in its Annual Corruption Perception Index, which was a constant source of embarrassment and agony to all well-meaning Nigerians and, indeed, Nigeria's global partners; hence the resolve of the Obasanjo administration to enlist the support of all Nigerians and the international community in fighting the scourge.

The public service is at the heart of governance and any initiative against corruption, must of necessity, begin from, and be driven by the service. Within the public service, the most strategic group that must be enlisted to log on to the process of enthroning a new moral order in the society, is the top echelon of the public service, comprising permanent secretaries, directors-general, chief executive officers of government agencies and directors in federal ministries, departments and agencies (MDAs). This was the rationale of the **High-Level**

## FOREWORD

**Executive Training Workshop on Organizational Integrity and Strategic Corruption Control**, which was held as one of the series of initiatives to obtain the commitment of the top hierarchy of the public service to the eradication of corruption in our national life. Additionally, the initiative was to create a platform to hold them accountable for inability to institute appropriate management systems to perpetually combat the scourge and for any failure on their part to demonstrate consistency of actions in the crusade against corruption. The recognition of the enlistment of the top hierarchy of the public service, for both the realization of a new moral order and the institutionalization of a new regime of public service management, anchored on high integrity and selfless service, is most crucial to the success of our current effort of national reawakening, good governance, sustainable development and accelerated national transformation.

President Obasanjo, during his interactive session with participants, handed down a number of directives which will go a long way to stir our public service towards the realization of these national goals. It is a fervent hope that readers of this edition will find the report very enlightening. The war against graft, corruption and its attendant vices will be enervating and long-drawn. It would require rare courage, not just from our leaders but from each of us, for the diligent prosecution of the war, until total victory is won for our restoration as a nation. The commitment of the Obasanjo administration is unequivocal. As members of the administration, we expect nothing less from all Nigerians and everyone of our partners all over the world, who truly believe in the ability of the Nigerian nation to overcome its present difficulties and move on to achieve greatness.

**Obiageli Ezekwesili**  
**Minister of Solid Minerals Development**  
**(Former Head, Budget Monitoring and**  
**Price Intelligence Unit, BMPIU)**

## ACKNOWLEDGEMENT

The High-Level Executive Training Workshop on Organizational Integrity and Strategic Corruption Control, held between 11 - 13 September, 2004, was an initiative of the head, Budget Monitoring and Price Intelligence Unit (BMPIU) and senior special assistant to the president, Mrs. Obiageli Ezekwesili, who after obtaining the approval of the president and the funding commitment of the minister of the Federal Capital Territory, Mallam Nasir Ahmad el-Rufai, invited the Bureau of Public Service Reforms to serve as the Counterpart Institution to work with the TIRI (Governance-Access-Learning-Network) team to organize the workshop.

That the Workshop was widely considered a huge success in spite of its organization time-constraint, was due, in part, to the excellent groundwork of TIRI team of facilitators, comprising Jeremy Pope, Fredrik Galtung, Neville Linton, their associates Tony Kwok, former deputy commissioner, Independent Commission Against Corruption, Hong Kong and John Elegido of the Lagos Business School, as well as the commitment and sacrifices of the Nigerian team, namely: the chairman, Independent corrupt Practices and other related offences Commission (ICPC), Justice Mustapha Akanbi, who spent his 72<sup>nd</sup> birthday on the floor of the workshop, the head of the Civil Service of the Federation, Mahmud Yayale Ahmed, who personally mobilized permanent secretaries to attend the workshop, and the head, BMPIU, Mrs. Obiageli Ezekwesili, whose dogged determination for success helped to sustain the momentum for the entire 3 days. It was a remarkable feat that, attendance at the workshop (74) surpassed the facilitators' target of 70 despite the short notice of less than 72 hours.

I wish to thank the above-listed external and national groups and individuals who contributed in diverse ways to make the workshop a huge success. I am also grateful to members of the coordinating team, rapporteurs, as well as accounts and logistics teams for their tireless efforts, without which we could not have made a success of the daunting task of organizing the workshop. My assistants, Victor Mayomi and Felix Barminas were, as usual, on hand to put finishing touches to the editorial work that produced this final report.

*ACKNOWLEDGEMENT*

Overall, I believe that the workshop was able to set a new standard, both in the quality of delivery, as well as in the organizational framework for international and inter-agency collaboration, which the Bureau of Public Service Reforms (BPSR) intends to sustain.

**Goke Adegoroye, Ph.D**  
**Director-General**  
**Bureau of Public Service Reforms**

## **Part 1**

# **Highlights of Deliberations during Plenary Sessions**

## **Day 1: Saturday, 11 September**

While welcoming the participants, the director-general of Bureau of Public Service Reforms, Dr. Goke Adegoroye, disclosed that they were carefully selected in consideration of both the strategic position of their organisations in governance and the public perception that they are pressure points of corruption. He said while organisations created pressures for the personal integrity of leaders, there were many instances when the conduct of chief executives and accounting officers constituted undue pressure on the integrity of their organisations. He urged participants to reflect on this in the course of the workshop, in order to proffer a solution.

The senior special assistant to the president and head of the Budget Monitoring and Price Intelligence Unit (BMPIU), Mrs. Obiageli Ezekwesili, stressed that corruption in Nigeria was no longer an imaginary problem, but rather a reality which must be combatted. She disclosed that the aim of the workshop was to ensure that participants were equipped with the necessary tools and mind set for fighting corruption.

The chairman of the session, Justice Mustapha Akanbi, who is also the chairman of the Independent Corrupt Practices and other related offences Commission (ICPC), observed that the training was the largest gathering of the nation's public service elite since the anti-corruption crusade commenced. He opined that corruption in Nigeria did not refer to the ₦20 bribe collected by policemen at roadblocks but to the millions of naira siphoned off procurement contracts. He described the anti-corruption crusade as a loud revolution, which requires commitment and support from all Nigerians of integrity. He enjoined the participants to rise up to the task.

Jeremy Pope, who led the team of Tiri<sup>1</sup> Network resource persons, highlighted that Nigeria was not alone in the struggle against corruption. He said that even the more developed countries, such as Canada, Hong Kong and New South Wales, were facing serious corruption problems. He traced the history of the evolution of the global crusade against corruption and observed that corruption always worked against the economic interest of nations, adding that the anti-corruption crusade had to be conceptualized in the public interest, as a measure of its effectiveness.

In the course of the interactive session that followed, there were various views about corruption and the anti-corruption crusade, salient among which were the following:

- i. The anti-corruption crusade is in the public interest; thus, there is the need to legitimately reconcile private concerns and individual interests (job security, shelter) with government's interest (reforms, rightsizing, privatization), in the context of the crusade;
- ii. Whereas some countries were perceived as corrupt, they were still able to attract high-level foreign direct investment (FDI) with a resultant high GDP growth (eg China), Nigeria's anti-corruption crusade would, however, be core to its efforts to attract FDI and stimulate GDP growth;
- iii. Norway, New Zealand and Hong Kong were highlighted as examples of the least corrupt countries. But Nigeria has to consider whether to adopt the Norway experience which lasted four generations or the Hong Kong example which lasted four years, as a model;
- iv. The perception by some participants that there are certain inherent cultural and ethical values in Africa which tend to condone corruption was considered defective because traditional African value systems place high premium on integrity and honour. The participants noted, however, that the evolution of a truly Nigerian value system, which is egalitarian in nature, was truncated by both the Civil War and the sustained military incursion into politics, with its inherent corruption tendencies;
- v. The erosion of the time-honoured societal and ethical values must be addressed and the tendency of the Nigerian society to glorify those who amass ill-gotten wealth should be seriously addressed;

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<sup>1</sup> Tiri is a not-for-profit organisation, established in 2003. The origin is from a Maori word that could mean the lifting of taboos for the protection of society.

- vi. On the relationship between corruption and democracy in Nigeria, it was noted that whereas leaders in a democracy are accountable, those in traditional systems are not;
- vii. The crucial role of the political class in the crusade against corruption was stressed;
- viii. The rating of Nigeria as the 2<sup>nd</sup> most corrupt country in the world was questioned. Participants stressed that the so-called 'corruption-free' countries which received stolen funds from 'corrupt nations' were equally corrupt, perhaps more corrupt, and therefore, advocated a 'corruption acceptance index' in addition to 'corruption perception index';
- ix. The emergence of corruption in the public service was attributed, largely, to the enthronement of mediocrity and the societal tendency towards materialism. Greed was, however, identified as the basic cause of corruption. The participants appraised, with apprehension, the ongoing reforms of the government. Among the various opinions expressed on this were:
  - a. that the manner in which the current civil service reform is being driven is reminiscent of the reforms of 1976 and 1994, both of which had attendant negative and disruptive effects;
  - b. that reforms are considered an essential and integral part of a dynamic system. But from the way the civil service reform is being pursued, there is the tendency for the civil service, which is the only institution that checks the excesses of the political leadership, to be cowed; and
  - c. that since the reforms in the civil service would affect the *physiology*, *psychology* and the well-being of the workers, it is vital to execute such reforms in a rational and humane manner, in order to avoid dysfunctional results, especially given the primary focus of the civil service – service delivery;

Corruption in Nigeria is traceable to poverty and bad governance. It was suggested that it would be worthwhile to commission a study into 'when', 'how' and 'why' the ethical and cultural values of the Nigerian society were lost, as well as 'what' would be the effective remedial measures. It was generally agreed that the trend be reversed; and that because of the milestones already achieved, the efforts at reversing the trend should not be resisted. However, there was the view that the type of training programme being conducted for top public servants ought to have started with the political leadership. Other views on this matter include:

- i. the due process certification of procurement ought to be internalized and carried out within the rubric of the civil service. In that regard, the current BMPIU team would impart their expertise on civil servants.
- ii. the civil service appear to be resisting the changes envisioned by the reforms, even though they were meant to affect it positively. This was apparently because the reforms were perceived to be externally conceived, externally implemented and externally driven;
- iii. the participants emphasized the need to carry along civil servants in the reform process to ensure that they internalize it. This will guard against the experience of the past, in which the changes were quickly jettisoned soon after they were effected.

In response, the director-general, BPSR, stressed that the bureau was established by and situated in the office of the head of the civil service of the federation (OHCSF) to ensure that every facet of the reforms, no matter from which sector it was initiated, was driven by civil servants and internalized within the public service, so as to ensure their sustainability beyond the tenure of the Obasanjo administration.

Consequently, a three-pronged approach to tackling corruption was advocated. These were: *deterrence, prevention and education*. Drawing from the experience of Hong Kong, participants were advised to utilize the training to identify themselves as part of the solution and, therefore, to focus on what they could do to help. They were also advised to be personally committed to the crusade, and to identify what each participant could do at personal and organisational levels to help.

Participants were, however, critical of the haphazard manner in which policies were being adopted for implementation, as such situation had only encouraged top functionaries of government to experiment rather than implement, often with adverse effects. The need for participants and all those involved in the anti-corruption crusade to practise what they preach was stressed. This would make them true vanguards, worthy of emulation.

It was also stressed that collaborative partnership between the public and private sectors in the crusade against corruption be forged to ensure an all-inclusive participation. The participants were challenged to develop anti-corruption strategies and a code of ethics for their staff, as well as encourage whistle-blowing and promote probity among staff.

As part of the overall strategy for combatting corruption within an organisation, participants were advised to set good examples through personal conduct, establish dedicated investigation and monitoring units, as well as develop effective mechanisms for detecting early signs of corruption. An allusion was made to some government policies which encourage corruption because they were either repressive or difficult to implement, thereby giving room to public servants to seek shortcuts. It was, however, stressed that these were no excuses for perpetrating corruption, especially by public servants.

## **Day 2: Sunday, 12 September**

Setting the tone for discussion, Mr. John Elegido of the Lagos Business School made a submission on building organisational integrity and implementing a code of ethics. To do this, he identified the three essential elements: standards, culture and leadership. He stressed that standards are sustained by culture and driven by leadership. He posited that codes of ethics are not self-enforcing; they constitute part of a larger cultural system.

He opined that since adults get their ethical bearings from peers and leaders, rather than from convictions, unethical behaviour is not a factor of a flawed individual, but rather, of an environment which encourage and support bad behaviour. He maintained that it is not enough for a leader to be a person of integrity, he must also be able to lead and manage with integrity and let his staff know what is expected of them, as well as hold them accountable for any unethical conduct. He added that leaders must exhibit positive examples and commitment, as well as zero-tolerance for unethical conduct. He concluded that committed and effective leaders get results even in difficult circumstances, but stressed that participants should be mindful of the fact that since the results of change usually take long to manifest, people normally get impatient and tend to lose momentum.

Leaders must thus constantly remind staff about standards and values as well as articulate the efforts of staff, with a view to raising their vision. Speaking on the lessons that the public sector could derive from the private sector's anti-bribery reform programme, Jeremy Pope, who developed a set of principles at Transparency International, said that the principles were designed for use in large, medium and small private transactions. The principles of the reform programme included the prohibition of bribery; commitment to the values of integrity, transparency and accountability, as well as the creation and maintenance of trust, based on the internal culture which abhorred bribery. The facilitator expatiated further on the aims and principles of the programme for countering bribery.

The Nigerian cultural disposition and the practice of giving gifts to visitors were discussed; there was a general perception that these have the potential to be corruptive. During discussions, participants made a case for public officials who were perceived to be of high-level integrity, to guard against actions that might negatively impact on the perception of the public about them. The ongoing civil service reforms were also discussed, especially the extent to which they should

restore and sustain the tenure of service for civil servants. Furthermore, in view of the rising pension bill, which was a direct consequence of retirement, it was discussed that efforts should be made towards implementing the reforms in a well thought-out manner.

Reference was made to the emphasis on efficiency by service compact (SERVICOM), with a near-absence of integrity. A case was consequently made for an INTEGRITY COMPACT, either within or outside the SERVICOM COMPACT, which would be flexible enough for organisations to factor into organisational or operational peculiarities.

A call was made for the ongoing reforms to be focussed; emphasis was on the need for the public sector to change itself or, in the alternative, a change would be imposed on it from without. The experience of New Zealand was noted, in which after the initial privatization of the public sector, the sector itself metamorphosed into a more efficient operator of some other sectors; some of the privatised utilities were again taken over.

In response to some of the issues raised by participants, it was clarified that:

- i. There were adequate codes in Nigeria's laws for curbing corruption, but that the problem still remained that of implementation and enforcement;
- ii. The institutionalization of 'gift registers' was identified as a sure way of avoiding the conflict between tradition and modernity, with regard to gifts giving and the ethical conduct of public officers;
- iii. The argument that poverty and poor remuneration in the public service were the cause of corruption was not accepted because 'the public sector worker ought to set the example of being able to manage his affairs and standards within his lawful income';
- iv. Public officers must be courageous enough to admit that once they accept to serve in the public domain, they subject themselves to public scrutiny and occasional insults. They should, as long as they serve, aspire to serve well and improve the society.

During the media interaction session, it was reiterated that the public sector, being the domain of the public servant, who holds power and authority in trust for the people, must be in the forefront of the crusade against corruption. The poor rating of Nigeria on the global corruption perception index was described as being worrisome; it was generally agreed that, beyond platitudes and conferences, more fundamental actions were required, such as the collaborative efforts with Tiri Network, which aimed at building capacity, empowering institutions to combat

corruption, as well as sharing experiences with other countries in their anti-corruption crusades.

The session chairman highlighted the resolve and commitment of the president of Nigeria to combat corruption, such that he made it a cardinal aspect of his electioneering campaign in 1999. He however, emphasized that it was not possible for the president to carry out the crusade alone. He enjoined the participants to recognize that, since the government has admitted the existence of corruption and made manifest declarations to combat it, as public officers, they must join the crusade, otherwise, they should leave government service.

Corruption was described as anti-development; and the allusion to poor remuneration as the cause of corruption in the public service was described as fallacious. It was admitted that, whereas government had a duty to cater for its officials and citizens, the citizens has the reciprocal responsibility to support and sustain the anti-corruption campaign. The participants were challenged to appreciate and regard public office as an opportunity, which they ought to utilize as a pedestal for exhibiting their talents, intellect and integrity, rather than a means of personal enrichment. In any case, if anyone of them decides to be corrupt, they were warned that there would be mechanisms and bodies to fish them out and punish them appropriately.

The challenge to sustain the momentum of the crusade was stressed, especially since the expectations of the public had been raised. Participants were reminded that they would be held personally and vicariously responsible for the crusade in their organisations; and this was a novel development. The broad generalization which malign and impugn the integrity of the Nigerian public officer was described as the tonic for stimulating the public service towards purging itself of that image and creating a change. Hence, there is the need for the civil service to design and propel some changes, as well as a need for it to take charge of the reform initiatives, which had commenced, otherwise it would be confronted with externally-propelled reforms.

There was a consensus among the participants that the focus of the crusade against corruption should not be limited to monetary bribes; it should also include the mode of implementing normal mandates of central agencies in the service, in such areas as recruitment, promotion, posting, etc, which often encourage corruption.

In response to questions raised during the media interactive session, the director general, BPSR, explained that during the retreat for federal permanent secretaries, at ASCON, Badagry, Lagos, the president set the tone for the

evaluation of competency, specialization and experience service-wide, as a basis for determining the right deployment for officers. The destructive role of conflict of interests and its effect in eroding exemplary leadership quality and mutual commitment was highlighted. As a way out, the participants suggested:

- i. the establishment of 'gift registers'
- ii. empowerment of officers, in order for them to develop the courage to disclose those aiming to influence policy decisions
- iii. regular disclosure of the consequence of corruption

Pertaining to the provision of funds for the implementation of the anti-corruption crusade, it was revealed that the president of Nigeria has already addressed the matter, and that this would be taken care of in the 2005 budget. In addition to identifying 'conflict of interests' as a critical corrupting factor, the issue of undue loyalty to tribe and ethnicity was singled out as a very important factor in the fight against corruption.

### **Day 3: Monday, 13 September**

Mr. Tony Kwok, former deputy commissioner, Independent Commission Against Corruption (ICAC), Hong Kong, opened this session with a presentation on Hong Kong's experience with strategic corruption control. He identified deterrence, prevention, and education as the three-pronged approach to controlling corruption in Hong Kong. Using the organogram of the Hong Kong ICAC, he identified operations/enforcement, corruption prevention, and community relations as the three core departments which helped the agency record remarkable success within three years of its existence. He, however, maintained that enforcement/operation was the most important aspect of the crusade. In order to achieve this, the following factors were applied:

- i. demonstration of political will
- ii. encouraging public support and relying on the public for information on corrupt persons
- iii. public education
- iv. recovery of proceeds from corrupt activities
- v. deterring the most corrupt

He identified good laws, especially those which make corruption a high risk crime, as an effective deterrence to corruption. He also emphasized professionalism as a key ingredient in any anti-corruption organisation, especially in the fields of investigation, intelligence, information technology, accountancy, law, PR educators, ethics experts, etc. He posited that adequate training should be given to such professionals to develop the requisite skills and competencies. He also stressed that effective complaint system should be put in place to encourage public report. This would also promote zero tolerance, proactive approach, effective prosecution, disciplinary actions, publicity, etc. For effective community education, he recommended the following steps:

- i. Media publicity, encompassing press releases, media conference, TV dramas
- ii. Mass media commercials
- iii. School moral education
- iv. ICAC clubs

Public sector education should be imparted through these channels: a discipline code, supervision seminars, and practice/manager guidebooks. He stressed that equal emphasis should be placed on the fight against corruption in the public and the private sectors. Partnership with other agencies is one of the key tools for fighting corruption. In this wise, the establishment of anti-corruption units in MDAs was commended.

For any anti-corruption agency to succeed, Tony Kwok identified two key factors – political will, and the independence of and adequate resource allocation to the agency. He enumerated some few areas that must be cautiously looked into:

- i. *Staff monitoring* – there should not be exhibition of extravagant lifestyles, overgenerosity, indebtedness and the refusal to proceed on transfer or annual leave;
- ii. *Outdated/inadequate policies and instructions* – ie, a situation whereby staff are left to create their own aims/ objectives because there is no comprehensive knowledge of what is required of them;
- iii. *Unenforced/unenforceable laws* – if enforcement of laws is selective and inconsistent, the laws should be reviewed;
- iv. *Indiscretion and unnecessary delays* – for example, where there is recourse to ‘back chair’, there should be ‘spot checks’ through an effective public complaint system;
- v. *Lack of supervision* – to avoid a situation whereby staff work without supervision, there should be clear and realistic targets, proper internal procedures, and managers should encourage unbiased reports and statistics;
- vi. *Lack of transparency* – to make the reforms transparent, policy procedures, performance pledges should be publicised, and there should be effective communication among all the stakeholders;
- vii. *Poor information* – (this could relate to leakage of confidential information and breach of personal data privacy). The solutions advocated include computer security controls through the use of passwords and the introduction of audit trails.

Institutional performance measurement and monitoring were recognized as being an interplay of three matrixes, which are:

- i. awareness/attitude, which helps to provide publicity
- ii. advocacy on corruption and its effects
- iii. policy prescription to combat corruption

The corruption risk areas in the public sector were identified; these included clients/ contractors. Consequently, the output measurement of corruption should include such indices as number of convictions, number of complaints, transparency procedures, as well as follow-ups with customer/clients. The outcome measurement of corruption should aim at reducing the incidence of corruption while improving public sector integrity.

## Part 2

### Interactive Session with President Olusegun Obasanjo

In his remarks, Justice Akanbi thanked the president for finding time to join the distinguished senior civil servants attending the workshop which was aimed at developing a strategic plan on integrity and corruption control. He observed that the workshop, being the first of its kind, provided an opportunity for very senior officers of the public service to discuss the problem of corruption. He noted that participants had worked hard to develop an action plan, which if well implemented, would go a long way in addressing the problem and achieving the desire of the president of Nigeria – ie, securing a corrupt-free society.

On his part, Dr. Yayale Ahmed, the head of the civil service of the Federation, acknowledged the president's passion in the eradication of corruption in Nigeria. He said that the president was justified in his anti-corruption crusade in view of the fact that the civil service is the only machinery available for the implementation of government policies. He thanked the president for giving the civil service the chance to evolve and reform itself, for improved service delivery.

He also appreciated the growing understanding between the civil service and the Due Process Unit. He advised that both sectors engage in continuous interactions to smoothen the rough edges and bring about a performance-driven service, stressing that, with time, the two would work towards ensuring prompt service delivery. Using the president's story of the tortoise and its in-laws to buttress the need for patience and forgiveness, the head of service appealed to the president to exercise patience with the civil service managers to evolve the desired change that would lead to the establishment of a service of integrity.

Mr. Frederick Galtung, who led the facilitators, noted that the global fight on corruption had advanced to the third stage of implementation and enforcement. This, he noted, would require the active participation of all stakeholders. He therefore commended the efforts of the organizers of the workshop.

Summarizing his own contribution, Mr. Tony Kwok noted that Hong Kong which, as a British colony in the 1960s-1970s, was noted for its institutionalization of corruption, established an anti-corruption agency in 1974, which successfully

cleaned up Hong Kong and helped it become one of the world's most corrupt-free countries. He posited that if Hong Kong could successfully deal with the problem of corruption, Nigeria was capable of doing the same, provided the following were given the desired attention:

- i. sustained top level political will as currently provided by the president
- ii. effective anti-corruption agency, such as ICPC
- iii. partnership approach with the rest of the society, ie, involve the civil service and the civil society

He commended the passion of the top officials of the Nigerian Civil Service, stating that such a passion gives a sense of mission in the fight against corruption.

### **Synopsis of Presentation by Syndicate Groups**

The various syndicate groups identified some key integrity problem areas in the public service, as follows:

- i. system inadequacies/ defects / control
- ii. human factors
- iii. lack of deterrence
- iv. institutional weaknesses
- v. weak political will

Consequently, they proffered the following solutions and recommendations:

- a. The reviewed process of procurement and pay system should be decentralized and internalized within the routine civil management process.
- b. The due process mechanism should be integrated into and domiciled in the civil service within three months.
- c. The argument that there is a relationship between poor remuneration and corruption was proven wrong with the revelation that the highest corruption levels were found in high remuneration areas. They however identified the imperative for a remuneration review in the civil service to allow for new skills/ competencies and recruitment of new hands.
- d. The current procedure for transacting government businesses was considered wasteful; hence there was a call for modernizing it. To achieve this, the groups recommended:
  - introduction of e-government within two years; and

- computerization of records to achieve paperless filing system within sixteen months
- e. To facilitate transparency and accountability in government business, the groups recommended the following:
- the involvement of the public in the procurement process by improving their access to procurement transactions;
  - increased awareness of the process;
  - enactment of the freedom of information act to remove barriers to obtaining information on government transactions, except those considered to be classified;
  - setting clear and practical performance targets for all MDAs;
  - rapid installation of e-government to bring transparency to governance;
  - price standardization/ indexing should be completed and circulated to all MDAs in the next twelve months.
- f. That reforms are welcomed, but should be pursued and implemented in a manner which would not be punitive and intimidating, but rewarding, to hard working staff.
- g. All MDAs should produce a strategic corruption-fighting plan, in consultation with the respective stakeholders, in the next three months.
- h. The groups acknowledged the credibility gap between staff and management and recommended the following steps to address such shortcomings:
- integrity training and sensitization for both management and staff;
  - integrity checking system for senior public officers;
  - intensification of the current public service reforms to ease out incompetent, indolent and corrupt public officials;
  - all MDAs should evolve codes of conduct peculiar to their mission/visions, as well as the services they deliver;
  - there should be strict imposition of rules to serve as deterrence to non-conformists.
- i. The Groups noted the negative attitude of public servants to work and, accordingly, recommended the following remedial measures:
- design of code of conduct in consultation with staff
  - quick and prompt reward for hard work and the establishment of mechanisms to internally protect 'whistle-blowers'.

- j. To address the problem of institutional weaknesses, the groups recommended:
- strengthening of enforcement institutions, such as Independent Corrupt Practices and other related crimes Commission, the Code of Conduct Bureau, the police force, the Economic and Financial Crimes Commission, etc;
  - establishing and strengthening anti-corruption units (ACTU) in all MDAs;
  - screening and vetting of all staff who serve in ACTU to enshrine credibility and forestall abuse in the system
- k. Enforcement of rules on staff postings and promotions; closer monitoring of supervising officers and regular spot checks.
- l. The need to organize similar workshops and training programs to highlight the issues discussed, especially for groups outside the public service, including the National Assembly. A similar workshop for both the political leaders and managers was also considered desirable.
- m. The anti-corruption units should be independent of the management hierarchies of the ministries, in terms of appointment and operations, so that they can be adequately empowered to carry out their mandates.
- n. There should be a de-briefing of the decisions reached at this meeting to the top management of the ministries/agencies.
- o. Above all, *due process at all levels should be observed and upheld.*

### **Remarks by President Olusegun Obasanjo**

The president thanked the facilitators for coming to share their experiences with Nigerian civil servants. He also commended the officers of the civil service and other participants for setting aside the weekend to listen to others' experiences and evolve strategies for a Nigeria of integrity. He directed that the integrity training workshop (ITW) should be held every 6 months for this level of officers, with intermediate training in-between the periods for the directorate and other levels; and that a unit to deal with retreats and seminars in the public sector would be established in The Presidency. He endorsed the recommendation that the workshop should be extended to political appointees, the legislature and judiciary, due to its rewarding nature.

To ensure that there was a clear mutual understanding of the subject matter, the president, with the help of a dictionary, defined corruption as the 'dishonest

exploitation of power, for personal gain', including gains to ones spouse, relations, peer group, etc. He further explained that corruption might not be in material terms only, citing the employment of relatives into offices they do not qualify for as an element of corruption.

Quoting the Quran (Surah 83:1-2) he stated that: 'Woe to those that deal in fraud, who will have to receive from men by measures but give less when they have to give. . . It is a spirit of injustice that is condemned, giving too little and asking for much'. And from the Holy Bible (Ecclesiastes 7:7): 'Extortion turns a wise man into a fool and bribe corrupts the hearts . . .' He stressed that corruption was not only anti-development but also anti-society and that its prevalence would not lead to the greatness of Nigeria. He therefore advised participants to do something positive to combat it.

He announced that a procurement commission would be set up and its functions decentralized with guidelines and standards. He noted that the excuse by public servants that low remuneration leads to corruption would no longer be condoned, as officers had the option of leaving the service if they felt dissatisfied. He reiterated that public servants should always serve with integrity, else, they should take the path of honour, by leaving the service rather than making excuses to condone corruption.

On e-government, the president stated that he appreciated the benefits of e-governance to transparency and reiterated that Nigeria should work towards achieving e-government as soon as possible.

On the Right to Information Act, he expressed his support to open and easy access to information; and stated that the proposed procurement commission would address the issue of price index. And on the credibility/perception gap, he stressed that this perception must be changed, although, acknowledging that it would not be easy.

The president directed that integrity tests should henceforth form one of the benchmark criteria for appointment and promotion of top-level officers. In furtherance of this, the OHCSF, through the BPSR, was directed to carry out core competency assessment of public servants and that this should thenceforth provide a basis for merit and integrity-based deployment of officers service-wide.

The president stated that he supported adherence to rules and that sanctions must be prompt, while good conduct should be rewarded early. He abhorred the civil service rules that are characterized by lengthy disciplinary procedure, which does not give room for expedient dispensing of cases of breaches of conduct. He further noted that the situation where kith and kin of erring officers in the civil

service resorted to the 'begging culture' should be looked into. He said that there must be strict adherence to rules, regardless of who was involved.

President Obasanjo accepted the recommendation that ACTU staff be well screened before engagement, stressing that there was no sense in having a corrupt person in ACTU or for its staff to be influenced by corrupt chief executives. In the same vein, he supported a public service complaint system that would protect whistle-blowers, while deterring frivolous and malicious complaints in order to expose corruption in the public service. He stated that the civil society and private sector would be encouraged to serve as whistle-blowers on corruption practices by public officers.

The president also remarked that for the sake of progress, everyone must become change agents. Accordingly, he advised all participants to join in the vanguard of the anti-corruption campaign so as to leave behind an enduring legacy. In this wise, he directed each MDA to develop a strategic action plan for organisational integrity and corruption control, and that the plans would be vetted and resources allocated for their implementations, based on the merit of each plan.

The president acknowledged that there were some positive results in the survey conducted at the workshop, one of which was that corruption was becoming abated. He challenged participants to work hard to bring it further down.

He concluded by stating that the civil service had a vital role to play in making Nigeria great, and emphasized that if it failed, a revolution, which would sweep it out, might ensue. He prayed for an evolution of gradual positive change rather than a bloody revolution, which might not spare anyone. When he was through with the speech, he handed the list of some directives he had issued to the coordinators of the workshop and the head of BMPIU.

The director-general of BMPIU, Obiageli Ezekwesili, thanked the president for the time spent with participants, and noted that this was an indication of the priority he accorded the subject of integrity in the service. She appreciated, on behalf of the participants, the 'positive anger' expressed by the president, and said it was aimed at fighting the nation's number one enemy – corruption – and noted that the battle had been renewed once again.

### **Presidential Directives**

For emphasis and easy reference to the follow-up actions by the relevant MDAs, the presidential directives issued at the workshop were as follows:

- i. Each ministry, extra-ministerial department, agency/corporation (MDA) is to develop a strategic action plan for organisational integrity and corruption

- control. These action plans will be vetted and resources will be allocated for their implementation, based on the merit of each plan.
- ii. Integrity tests will henceforth form one of the benchmark criteria for appointment and promotion of top-level officers.
  - iii. The OHCSF, through the Bureau of Public Service Reforms (BPSR), is to carry out core competency assessment of public servants service-wide and this should henceforth provide a basis for merit and integrity-based deployment of officers, service-wide.
  - iv. An independent survey will be carried out to measure corruption perception of public servants in relation to clients' satisfaction.
  - v. The BPSR, in collaboration with the ICPC, should develop a public service complaint system that will protect whistle-blowers while deterring frivolous and malicious complaints in order to expose corruption in the public service. The civil society and the private sector will be encouraged to serve as whistle-blowers on corrupt practices by public officers.
  - vi. Corruption in the public service would no longer be condoned as officers have a choice to leave the service if they are dissatisfied with the remuneration system. Integrity demands that public servants take the path of honour rather than make excuses to condone corruption.
  - vii. Declaration of true age is a mark of integrity. Service-wide authentication of date of birth for officers should be conducted by the OHCSF/BPSR to identify officers who are in the habit of frequently changing their birth dates. Offenders are to be penalized.
  - viii. Integrity training workshop (ITW) shall now be carried out every 6 months for management-level officers, with intermediate training in-between the periods for the directorate and other levels.
  - ix. The workshops will be extended to political appointees, while the legislature and judiciary will be encouraged to adopt it.

## Programme of Activities

Table 1. Organisation Integrity and Strategic Corruption Control High Level Training, Abuja, 11 - 13 September, 2004

Friday 10th	Saturday 11th	Sunday 12th	Monday 13th	Tuesday 14th
	9.00-9.30a.m. Opening DG. BPSR, SSA-P. BMPIU	Free time	8.30 - 10a.m. Strategic corruption control: red flags, scandals internal inquiries	
	9.30-11.00 Rationale: Nigeria's integrity system and institutional integrity systems	Free time	10.30 - 12.00noon Measuring and monitoring institutional performance	
	11.30 - 1.00p.m. Institutional design: overall integrity strategies	12noon - 1.30p.m. Building organisational integrity: implementing codes of conduct	12 noon - 1.30p.m. Strategic corruption control achieving a sustain-able approach	
5.00 p.m. Registration	2.30 - 4.00p.m. Institutional design: complaints mechanisms, making managers manage	2.30 - 4.00p.m. Getting the people right	2.30 - 4.00p.m. Overcoming the impediments to reform <i>Plenary discussion</i>	
	4.30 - 6.00p.m. Overcoming the impediments to reform <i>Discussion groups</i>	4.30 - 6.00p.m. Overcoming the impediments to reform <i>Discussion groups</i>	4.30 - 6.00p.m. Interactive session with the president	

Table 2. Detailed Schedule for the Training (11 - 13 September, 2004)

Day 1	Programme			
Saturday 11/9/2004	<p><b>Session 1</b> Rationale: Nigeria's integrity system and institutional integrity Systems Chairman: Hon. Justice MMA Akanbi CFR</p> <ol style="list-style-type: none"> <li>Jeremy Pope (5 mins) Opening statement by facilitators (expectations etc.) (commonality no clashes with other reforms)</li> <li>Fredrik Galuhag (15 mins) The global scene and rationale Discussion (10 mins)</li> <li>Jeremy Pope (20 mins) National &amp; institutional integrity systems Discussion (10 mins.)</li> <li>Neville Linton (30 mins) Integrity in african culture (in the form of a discussion session) M: Nigeria is not alone: it's global M: global effort has advanced M: public interest is the driver M: adopt the holistic approach</li> </ol>	<p><b>Session 2</b> Institutional Design: Overall Need for Integrity Strategies Chair: Hon. Justice MMA. Akanbi CFR 1. Neville Linton (10 mins) • Legitimacy Why do we exist? What are we for? • How (that) corruption perverts missions</p> <ol style="list-style-type: none"> <li>Jeremy Pope (10 mins.) • Leadership (private sector) (what hinders ability to demonstrate) (need to institutionalise to be sustainable) (institutional integrity audit and risk management approaches) • Advantages of transparency (does transparency help or hinder?) • Where are (defining) the risks?</li> <li>Fredrik Galuhag (10 mins) • Successes and failures? Discussion (remaining time) M: public institutions owe their existence to the public (legitimacy of state power) M: can audit the integrity system M: transparency is an asset not a liability develop culture M: failures of individual-based strategies (Italy, Philippines, Bolivia)</li> </ol>	<p><b>Session 3</b> Institutional Design: Complaints Mechanisms, Making Managers Manage Chair: Hon. Justice M. M. A. Akanbi, CFR 1. Tony Kwok (20 mins) • Managers 'managing' (Do managers accept responsibility for subordinates? What are the obstacles? Do managers get fired when subordinates are on the take?) • Building a culture of responsibility • Do complaints help? • Encouraging those with complaints to make them safely <ol style="list-style-type: none"> <li>Jeremy Pope (15 mins) • Horizontal accountability • Lessons from the private sector principles (more tomorrow) • Whistleblowers (help or hindrance) Discussions M: managers to accept responsibility for subordinates M: a culture of responsibility M: complaints are crucial and helpful and must be heard M: reliable internal/external complaints mechanisms essential</li> </ol> </p>	<p><b>Session 4</b> Brainstorming: Overcoming the Impediments to Reform All facilitators as small group moderators 1. Overcoming obstacles to transparency (mindset; traditional practices) 2. Getting managers to 'manage' and accept responsibility 3. Making the best of the Transparency and AC units 4. Handling internal complaints and protecting whistle blowers: installing reliable systems 5. Handling external complaints 6. Training needs? 7. What can we do? 8. Where do we start?</p>

<p>Day 2</p> <p>Sunday 12/9/2004</p>	<p>Programme</p> <p>Free morning</p>	<p><b>Session 5</b>  <b>Building Organisational Integrity: Codes of Conduct</b>          Chair: Hon. Just. MMA Akanbi, CFR</p> <ol style="list-style-type: none"> <li>1. <u>John Elegido</u> (20 mins)           <ul style="list-style-type: none"> <li>• Institutional integrity reform</li> <li>• Leadership</li> </ul> </li> <li>2. <u>Neville Linton</u> (15 mins)           <ul style="list-style-type: none"> <li>• Leadership business model</li> <li>• Codes of conduct etc</li> <li>• Departmental initiatives</li> </ul> </li> </ol> <p>Discussions          M: projecting institutional values to staff and stakeholders          M: codes of conduct must be made to work          M: codes of conduct must protect ethical conduct          M: citizens must know their rights          M: professional external monitoring is an asset          M: ethical conduct must be rewarded/ infringements sanctioned</p>	<p><b>Session 6</b>  <b>Building and Maintaining Ethical Staff</b>          Chair: Hon. Just. MMA Akanbi, CFR</p> <ol style="list-style-type: none"> <li>1. <u>Tony Kwak</u> (10 mins)           <ul style="list-style-type: none"> <li>• Does merit matter?</li> <li>• Making merit selection work</li> </ul> </li> <li>2. <u>Jeremy Pope</u> (15 mins)           <ul style="list-style-type: none"> <li>• Conflicts of interest</li> <li>• Trading with the ministry?</li> <li>• Monitoring lifestyles?</li> <li>• Countering wrongful interference</li> </ul> </li> <li>3. <u>John Elegido</u> (10 mins)           <ul style="list-style-type: none"> <li>• Conflict of interest and the private sector</li> <li>• Experiences from Nigeria</li> </ul> </li> </ol> <p>Discussions          M: merit is of fundamental importance          M: nepotism is an enemy of good governance          M: conflicts of interest damage the public interest and damage the individuals involved          M: lawfulness is a basic value in public service</p>	<p><b>Session 7</b>  <b>Reinforcing the Impediments to Reform</b>          All Facilitators As Small Group Moderators</p> <ul style="list-style-type: none"> <li>• Handling the Minister? (Ministers as a positive, as a negative) (Strategies when asked to do the unlawful)</li> <li>• What are obstacles to getting corrupt staff fired?</li> </ul>
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Day 3	Programme			
Monday 13/9/2004	<p><b>Session 8</b> Strategic corruption control: red flags, scandals and internal inquiries Chair: Fredrik Galtung</p>	<p><b>Session 9</b> Measuring &amp; Monitoring Institutional Performance and Sustainability Chair: Hon. Just. MMA Akanbi, CFR</p>	<p><b>Session 10</b> Brainstorming: Overcoming the Impediments to Reform All facilitators as small group moderators</p>	<p><b>Session 11</b> Plenary Discussion: Overcoming the Impediments to Reform: Action Planning Chair: Head of Service</p>
<p>Tony kwok (20 mins) (ppt)</p> <ul style="list-style-type: none"> <li>• red flags</li> <li>• if you don't enforce, everything else has no meaning</li> <li>• what are the obstacles to implementation by ministries?</li> <li>• why has Nigeria not succeeded when HK could and did do it?</li> <li>• how many have corruption risk management strategies?</li> <li>• give some illustrations as to how is should be prepared and executed</li> </ul>	<p>1. Chris Ogebechie (10 mins)</p> <ul style="list-style-type: none"> <li>• Survey results</li> </ul> <p>2. Fredrik Galtung (20 mins)</p> <ul style="list-style-type: none"> <li>• How effective have been your efforts?</li> <li>• How do you know? How can you keep track?</li> <li>• Sustainable reform is knowledge Driven?</li> <li>M: the blind must not lead the blind (knowledge is power)</li> <li>M: consequences of ignorance</li> <li>M: demongstrating that you care</li> <li>M: integrated into systematic strategy</li> <li>M: the power (credibility) of external assessment</li> <li>M: civil society is an ally.</li> </ul>	<ul style="list-style-type: none"> <li>• Handling the minister? (Ministers as a positive, as a negative strategy when asked to do the unlawful)</li> <li>• What are obstacles to getting corrupt staff fired?</li> </ul>	<p>All facilitators with reports from small groups</p> <ul style="list-style-type: none"> <li>• (a large-scale PIEN exercise developed for Nigeria through LBS)</li> <li>• (start with pilot ministers? Volunteers?) But all to follow up) (Monitoring) (which ministries)</li> <li>• (built in incentives for career advancement) (no promotion without pass in course)</li> <li>• steps for individual ministries</li> </ul>	
<p>1. integrity testing. M: there is no option to enforcement</p> <p>M: non-enforcement is a licence M: stay alert: for red flags M: if Ifong Kong could succeed so too can a determined nigeria M: integrity testing and sting operations are essential but require professionalism M: for suspected criminal activity the anti-crime/corruption agencies must be brought in.</p>			<p>Session 12 4.30 p.m. - 6.00p.m. Closing Session: Interactive Session with the President MC: <b>GOKE ADEGOROYE</b> Goke Adegoroye's remarks Participants' views Workshop facilitators' views Head of Service remarks Remarks by the President Voice of thanks: Oby Ezekwesili</p>	



## **Part 3**

### **Synopses**

#### **The National Integrity System: Building and sustaining ethical and effective government**

**Jeremy Pope**

Every society, no matter its size or nature, has a culture and code of ethical behaviour. However, the pillars may vary, and the emphasis areas may differ from one society to the other. If power is concentrated in one person or body, this code of ethics can be abused. And for any society to succeed in its bid to build and sustain its ethics and government systems, interrelationships delineation is very crucial. So, with regard to this, what does the Nigerian integrity system look like? How capable is it in ensuring a lasting legacy of integrity in the society?

#### **The Concept of a National Integrity**

- The executive must, first and foremost, ensure that all areas of conflicting interests in the society are taken into consideration.
- The legislature/ parliament, on its part, must ensure free and fair elections.
- The legislature must also ensure that there is power in place to question senior government officials, through the establishment of public accounts committees.
- Government spending should be made public through the office of the auditor general.
- The public service should serve the interest of the public and the government, and should embrace the code of ethics for public servants.
- The judiciary must be independent of the executive and the legislature.
- The media should have free access to information.
- There should be freedom of speech and association within the civil society.
- There should be ombudsman – a body should be responsible for investigating and resolving complaints from members of the public against a public authority or institution.

- Anti-corruption and other watchdog agencies should be present to enforce laws and prosecute law breakers
- There should be policies that would encourage healthy competition in the private sector, including those on open public procurement rules
- There should be efforts to establish mutual legal/ judicial assistance inter-relationships with the international community

### **Horizontal accountability**

Each of the outlined components above must have sufficient strength and capacity for improvement and continuity. Although the components must have great measure of independence, they all must relate to each other, and must, to some extent, be interdependent. These components are the pillars of any sustainable reform. If a pillar fails to bear the load earmarked for it, it would increase the pressure on others. Having said this, what next? How do we relate these pillars with ethics?

### **Ethics: The missing element**

Ethics is one of the most important 'human elements' of government reforms that are usually overlooked. More often, man focusses on laws, institutions, infrastructure, personnel, etc, while completely ignoring ethics. We forget that men are not angels or superhuman beings. The earlier we realise that the reform process must be ethically-based for them to be solid and enduring, the better for the human society. The Nigerian integrity system (NIS) should be based on an 'ethics regime'.

### **Institutional integrity systems**

- These subsystems should exist within the NIS
- This is mainly because NIS cannot carry on the reform agenda alone
- It is imperative that these subsystems be approached holistically
- There is the need to draw an institutional integrity system 'map' that will serve as the signpost for the present and future administrations

### **Primary system pillars and practices**

With regard to the Nigerian integrity system, there are identified possible system pillars and practices. The primary ones include:

- Management (both in leadership and 'followership')
- Integrity and risk strategies

- Internal inspection/audit
- Codes of conduct and enforcement
- Record management
- Internal complaints mechanisms
- Clear conflict of interest rules
- Procurement procedures
- External complaints
- Monitoring of stakeholder perceptions

**Secondary system pillars and practices**

- Staffing, merit selection/ promotion of staff
- Assets handling and disposal
- External inspection (public audit)
- Transparent functioning
- Ethics training
- The national integrity system itself
- 'Horizontal accountability' present through complaints mechanisms available to staff and to external stakeholders

## **Building Integrity in Human Resources Management**

**Tony Kwok**

In building a national integrity system, there should be a transparent recruitment and promotion procedures, and that would be based on merit, in the staffing programmes, especially with regard to leadership or other sensitive positions. After recruitment or promotion, the officers or staff should be given training in ethics. Also, there should be:

- performance appraisal and promotion to place emphasis on integrity
- corruption prevention measures on promotion system
- job rotation
- audit trail
- declaration of assets and conflict of interest
- staff monitoring and complaint unit

### **Business anti-bribery principles**

For the various reforms to be effective, especially as regards the integrity system, the government, through the office of the Bureau of Public Service Reform, should design anti-bribery business rules for use in large, medium and small-scale enterprises. And these rules should apply to bribery in public offices and to private-to-private transactions. They should also provide practical guidance for countering bribery, creating a level playing field and providing long-term business advantages. In addition, they should:

- prohibit bribery in any form, whether direct or indirect
- be committed to implementation of a programme for countering bribery
- ensure a commitment to fundamental values of integrity, transparency and accountability
- create and maintain trust-based and internal culture in which bribery is not tolerated
- be based on holistic policies, processes, training and guidance

### **Aims of the anti-bribery principles**

- To provide a framework for good business practices and risk management strategies for countering bribery
- to assist in:

- a. eliminating bribery, and
- b. demonstrating the commitment to countering bribery
- To make a positive contribution to improving business standards of integrity, transparency and accountability

### **Developing Anti-bribery Programmes**

There should be a programme in place for countering or preventing bribery activities; and this would take to cognisance each sector, the potential risks and locations of such activities, and articulate the values, policies and procedures of every transaction. The programme should be consistent with all laws relating to countering bribery, particularly laws that are directly relevant to specific business practices in the public sector.

It should be developed in consultation with employees, trade unions or other employee representative bodies. At the formulation stage, the programme should ensure that it is informed of all matters material to its effective development by communicating with the relevant stakeholders.

### **Scope of the programme**

In developing this anti-bribery programme, an enterprise should analyse which specific areas pose the greatest risks to bribery. The programme should address the most prevalent forms of bribery relevant to the enterprise. It should, at least, cover the following areas.

#### *Bribes*

The programme would prohibit the offer or acceptance of a bribe in any form, including kickbacks, on any portion of a contract payment, or the use of other routes or channels to provide improper benefits to customers, agents, contractors, suppliers or employees of any such party or government officials. It would also prohibit an employee from arranging or accepting a bribe or kickback from customers, agents, contractors, suppliers, or employees of any such party or from government officials, for the employee's benefit or that of the employee's family, friends, associates or acquaintances.

#### *Gifts, 'hospitality' and expenses*

The programme would prohibit the offer or receipt of gifts, 'hospitality' or expenses whenever such arrangements could affect the outcome of business transactions and are not reasonable and bona fide expenditures.

### **Programme implementation requirements**

#### *Organisation and Responsibilities*

- The board of directors of every organisation should base their policy on the business principles mentioned above and provide leadership, resources and active support for implementation of the programme.
- The chief executive officer of any organisation should be responsible for ensuring that the programme is carried out effectively, with clear lines of authority.
- The board of directors, chief executive officer and senior management should demonstrate visible and active commitment to the implementation of the programme.

#### *Universal Application*

The enterprise should apply its programme in its dealings with subsidiaries, joint venture partners, agents, contractors and other third parties with whom it has business relationships.

#### *Human Resources*

- Recruitment, promotion, training, performance evaluation and recognition reflecting the enterprise's commitment to integrity.
- The human resources policies and practices developed in consultation with employees.
- Guarantee that no employee will suffer any adverse consequences for complying with the Code of Conduct.
- Sanctions applied by the enterprise for violations.

#### *Training*

- Managers, employees and agents should receive specific training on the programme implementation.
- Where appropriate, contractors and suppliers and outside stakeholders would also receive training on the programme.

#### *Raising Concerns and Seeking Guidance*

- Employees and other stakeholders should be encouraged to raise concerns and seek guidance, in the case of violation, as early as possible.
- There should also be secure and accessible channels for raising concerns (whistle-blowing) in confidence and without risk of reprisal.

- There should be channels for employees and others to seek advice or suggest improvements on the programme.

#### *Communication*

There should be effective internal and external communication, with regard to the programme. The management systems the programme would employ in countering bribery should be publicly disclosed. All enterprises should be open to receiving communications from relevant parties, with respect to the programme.

#### *Internal Controls and Audit*

- There should be strict maintenance of books and records; and these should be made available for inspection. The records should properly and fairly document all financial transactions.
- There is need for feedback mechanisms and other internal processes that support the continuous improvement of the programme.
- The internal control systems, particularly the accounting and record keeping practices, should be subjected to regular audit, to provide assurance that they are effective in countering bribery.

#### *Monitoring and Review*

The senior management should monitor and periodically review the programme's suitability, adequacy and effectiveness and implement improvements as appropriate. Also, it should, periodically, report to the audit committee or the board the results of the programme review. The audit committee or the board should then make independent assessments of the adequacy of the programme and disclose its findings through the annual report to shareholders.

## **Entering the Third Phase of International Anti-corruption**

**Friedrik Galtung**

**TIRI**

The 3<sup>rd</sup> phase of international anti-corruption has been propelled by the following four principal factors:

- i Globalization of trade, involving deregulation, privatization, foreign direct investment (FDI), emphasis on level playing fields.
- ii Globalization of norms, facilitated by civil society movements, transition to democracy, renewed emphasis on human rights, development of corruption perception index.
- iii End of Cold War resulting in examining issues beyond east and west ideological divide.
- iv Agents of change such as the US government, non-governmental organizations (NGO's), the World Bank, other aid agencies and corporate America.

From 1986 to mid-1990's, a handful of people and social movements were pre-occupied with breaking the taboo, by drawing attention to corruption as an international issue and building a case for reform to address the phenomenon. Between the mid-1990s to date, a few hundred people and social movements were enlisted in the crusade against corruption armed with new instrument of codes, standards and conventions for fighting the scourge. Currently, emphasis is an implementation and enforcement of these instruments for which a considerable number of change agents are needed.

### **Milestones in the International Community**

- 1977 International Chamber of Commerce's recommendations to combat extortion and bribery passed
- 1977 US Foreign Corrupt Practices Act (amendments, passed in 1988 and 1998)
- 1993 Transparency International established in Berlin
- 1995 World Bank Procurement Guidelines revised and expanded (further revisions in 1996, 1997, etc)
- 1995 Treaty on the Protection of EU Financial Interest
- 1995 Policy statement by the International Federation of Consultant Engineers

- 1996 Rules of Conduct to Combat Extortion and Bribery adopted by the International Chamber of Commerce
- 1996 Inter-American Convention Against Corruption approved by the organisation of American States
- 1996 UN General Assembly Declaration Against Corruption in International Commercial Transactions
- 1997 Organization of American State Convention Against Corruption comes into effect
- 1997 EU Convention on the Fight Against Corruption Involving Officials of the European Communities
- 1997 UN General Assembly Resolution urges members to ratify international Instruments against corruption
- 1997 Revised IMF guidelines adopted
- 1997 20 guiding principles of the fight against corruption, adopted by the Council of European Committee of Ministers
- 1997 OECD Anti-bribery Convention signed
- 1997 Certification requirement introduced by North American Development Bank
- 1998 Revised Procurement Policies and Anti-corruption Policies adopted by regional development banks (Inter-American, European, Asian, African)
- 1999 Criminal Law and Civil Law Conventions passed by the Council of Europe
- 1999 Group of States Against Corruption (GRECO of European Council comes into effect
- 1999 OECD Convention comes into effect
- 2000 Nyanga Declaration calling on organisation of African States to work on repatriation of stolen assets
- 2000 Wolfsberg Principles on Money Laundering and Corruption adopted by major private banks.
- 2002 Introduction of TI Business Integrity Principles introduced and adopted by major companies
- 2003 Introduction of Judicial Integrity Standard by group of Chief Justices, endorsed by World Court
- 2003 UN Anti-corruption Convention (signed in December 2003).

## Supervisory Responsibility

Tony Kwok

The Independent Commission Against Corruption (ICAC), Hong Kong has established a model for fighting corruption, based on a three-prong approach of deterrence, prevention and education. It also involves partnering with the following critical stakeholders.

- a. civil service commission and government departments
- b. business community
- c. professional bodies
- d. civic societies
- e. educational institutions
- f. mass media
- g. public
- h. international networking

### *Corruption prevention targets*

- poor system control
- poor staff integrity

### **The role of the manager**

The role of the manager in corruption prevention is to recognise that preventing corruption is a management responsibility, for which he has been appointed and strategically placed. Accordingly, managers must ponder over these questions/checklist of responsibilities to determine how well they are faring as agents of corruption prevention.

- How much time do I give to maintaining staff integrity?
- How much resources do I allocate?
- Do I believe in 'not washing your dirty linen in public'?
- Do I have a comprehensive anti-corruption strategy?
- Do I have effective internal regulations?
- Do I have a declaration system to avoid conflict of interests?
- Do I have a code of ethics for staff?
- How do I encourage whistle-blowing?
- How do I promote and reinforce a culture of probity and honesty among my staff?

- **What kind of example am I setting through my personal conduct?**
- **Do I have a dedicated internal investigation and monitoring unit?**
- **Do I have an effective system to detect early signs of corruption?**
- **Have I developed a set of best practices for corruption prevention?**
- **What is my action plan after this workshop?**
- **What are my key performance indicators in each area of interest?**

## **Strategic Corruption Control: Hong Kong Experience**

**Tony Kwok**

Corruption control in Hong Kong involves a three-pronged approach namely: deterrence, preventive and education. Enforcement is a key element in corruption curtailment as it demonstrates that there is a political will to check the scourge. In doing this, public support is assured, providing further justification for system review, public education, recovery of corrupt proceeds and implementation of other measures to deter the most corrupt.

Professionalism is essential requiring the harnessing of expertise of professional investigators, intelligence and IT experts, accountants, lawyers, management and technical experts, public relations, education and ethics experts, all with a sense of mission to effect change. An effective deterrence to corruption requires putting in place the following measures:

- an effective complaint system to encourage the public to turn in their reports
- a quick response to issues raised in the reports by the public, by anti-corruption agencies and other relevant institutions/partners.
- a culture of zero tolerance to corruption.
- a pro-active approach in dealing with known and emerging issues in corruption
- effective prosecution and disciplinary procedures/actions
- demonstration of the highest level of professionalism
- publicizing successful cases

Community education will also enhance the crusade against corruption as a strategy for winning converts to champion the cause of a corruption-free society; through its employment of the following channels

- media publicity, press releases, enforcement activities, conferences/interviews, television/radio drama series
- mass media commercials to elicit public support, promote public awareness, to deter the public, and serve as corporate image building of anti-corruption agencies.
- school moral education and ICAC clubs

- public sector education through self-discipline codes, preventive talks, supervision services, best practices/managers guide-book
- business sector through seminars and visits as well as ethics development centers
- professional bodies

While the public sector is usually the focus of anti-corruption initiatives, the tendency is to overlook the private sector. This must be avoided at all costs as equal emphasis should be placed on public and private sector corruption. Accordingly, this double standards should be avoided bearing in mind that the public and private sectors operate within the same economy, where investment and consumer interest must be protected, laws should be equitable to provide a level playing field, financial market stability guaranteed to foster national prosperity, reduce shocks, and public safety assured. Adequate laws and resources are additional incentives for carrying out anti-corruption crusade. No less important to the success of the anti-corruption efforts is the support of the following stakeholders.

- The Civil Service Commission
- other government departments
- the business community
- professional bodies
- civic societies
- educational institutions
- the mass media
- the public
- international networks

### **Red flags**

There are a number of 'red flags' which are indicative of problem situations requiring corrective measures, which are enumerated below.

**Red Flag 1:** The unhealthy lifestyles of staff can be indicative of corruption. Supervisors should note extravagant living, excessive gambling or stock market speculation, staff refusal to be transferred or go on holidays, dislike of supervision, staff's close association with

business men, tendency to overspend on colleagues and to fall into debt. A supervisor is obligated to report these observed behaviors. Another way to curtail staff extravagance is through rotation.

- Red Flag 2** Outdated/inadequate policy and instructions cause inappropriate discretion, disparity of treatment and excessive delays. Staff should create their own realistic aims and objectives through self-development and appropriate seminars.
- Red Flag 3** Unenforced and unenforceable law arise from a selective and inconsistent enforcement. Law should complement and help achieve policy aims; review the law and draft laws to ensure relevancy.
- Red Flag 4** Inappropriate discretion and delay, which results in people using the back door to get things done. To discourage this practice, performance should be examined periodically with spontaneous spot checks to expose where the bottlenecks occur. An effective public complaint system should be put in place.
- Red Flag 5** Non-supervision of staff who work on their own can lead to problems in credibility. To avoid disparities, physical spot checks, clear and realistic goals setting, institution of supervisory accountability and proper internal audit procedures, should be carried out.
- Red Flag 6** Lack of transparency can be corrected if the goals and policies are given enough publicity through website and the media. External monitoring by the public through lobbies and NGOs can effectively reduce the lack of transparency in the system. The abuse of official positions can be curtailed by media and other watchdog NGOs.

**Red Flag 7** Security leaks with respect to private and personal information can be stopped through the use of computer passwords; protocols can be developed to clean up and prevent paper trails.

A code of ethics is a useful tool for curtailing corruption. It should be set out clearly in the contract of employment, included in staff induction training as well as regularly reviewed and re-circulated. The ethics code should be packaged as a handy booklet for easy reference, and should strike a balance with human rights and privacy as well as satisfy the test of reasonableness. A few core concerns of the ethics code are the following:

- acceptance of entertainment and gifts
- conflict of interest
- abuse of authority
- leakage of confidential/sensitive information
- doing outside work at the expense of official job
- indebtedness
- loan
- declaration of investment
- excessive gambling
- Sunshine test

Investigating causes of corruption is a difficult exercise due to the secret nature of corruption, satisfied party/tainted witness, professional offenders, codes of silence, cross jurisdiction, use of high technology and professionals as well as the relationship of corruption and organised crime. These difficulties can be overcome by encouraging independent investigation.

Other critical elements are, adequate investigative powers, adequate resources, confidentiality of investigation, international assistance/support and adherence to professionalism, entailing the use of a combination of the following: general investigative techniques; interview techniques; financial investigations; search, surveillance undercover agents and informants. Support for investigations are also enhanced through intelligence index, witness protection, technical support and computer forensics. A corruption complaint system should be instituted with the following elements to guide its operations:

- encourage complaints to be submitted/reported
- provide customer services
- deter frivolous or malicious complaints
- ensure confidentiality
- protect whistle blowers
- be accountable to complainants witnesses and the alleged
- provide quick response
- be professional in investigation
- have in-built element of fair procedure for handling complaints
- provide checks and balances against abuse

Basic investigation procedures involve two stages; the covert and overt stage. The key activities of the covert stage begins with the investigation of the complainant, checking background of the complainant(s), suspects, witnesses and companies; interviewing witnesses, checking work procedure and checking money trail. The overt stage involves searching and/or interviewing the suspect. A proactive investigation is carried out through surveillance—physical and technical—through informants, undercover agent/entrapment and ambush.

The success factors for an effective investigation are as follows:

- attraction of quality complaints
- institution of a robust intelligence system
- use of interview technique
- practising investigation involving entrapment
- availability of whistle blowers and witness protection
- breakthroughs from financial investigation
- international cooperation
- full use of investigative powers
- large-scale arrest/search operations
- use of immunity witnesses
- avoidance of complacency with single offender

Allegations of corruption within government can be sourced through public reports on corruption and mal-administration; staff reports on cases of bribery and/or corruption within; supervisors' reports; and internal monitoring. The guiding principles in handling corruption allegations are as detailed hereunder:

- 'not washing your dirty linen in public'
- strike mutual understanding on publicity
- ensure early referral/advice
- ambush/arrest on time
- designate one officer as liaison
- use tape recording
- maintain confidentiality
- preserve evidence (chain of evidence, records, forensic evidence)
- issue advice to complainants
- issue advice to staff
- build up mutual trust with ICPC through long-term partnership approach.

The partnership of ICAC with the Police has been crucial to success and it has been fostered through the following platform and practices;

- police anti-corruption strategy steering committee
- operational liaison group
- police corruption-prevention group
- joint seminars and workshop
- training input to the police training school
- referral of cases and final reports
- sharing of intelligence
- joint operations.

The strategy and initiative of Hong Kong's Police in dealing with corruption involve the following elements:

- establishment of a police anti-corruption strategy steering committee (FASSC)
- establishment of working groups at regional and district levels
- implementation of other management initiatives, namely:
  - management of heavily indebted officers
  - promoting healthy lifestyles
  - promoting code of conduct
  - profiling of officers prone to corruption
  - maintaining confidential hotlines for reports
  - protection of whistle blower

- rotation of posts every two years

There is no single solution to strategic corruption control. Good practices in anti-corruption initiatives inform that the process should commence with the articulation of a comprehensive strategic plan, based on unique circumstances. The process should be enhanced with training and professionalism, while winning the support of political leadership and a sense of ownership from all relevant stakeholders and partners.

## The Essentials of Institutional Integrity

John Elegido

### **Culture**

Codes are not self-enforcing; they have to be part of a larger cultural system. Most adults get their ethical bearings from peers and leaders, not from their own convictions. Bad behaviour often results not from 'flawed individuals' but from an environment that encourages and supports bad behaviour.

Committed and effective leaders get results in very difficult circumstances. It is not enough to be a person of integrity, one must also learn how to manage integrity. You must, however, know that because the results of reforms sometimes take long to materialise, people get discouraged in the long run. Hence, there is the need to constantly:

- Lead others to work with integrity
- Let them know what is expected of them
- Hold them accountable for their ethical conduct

Apart from these, a leader must strive to demonstrate good character through his/her personal example and commitment to work. He must:

- keep hammering at the desired standards and values
- make continuous efforts to articulate the purposes and mission of the organisation
- make careful decisions on hiring, assigning and promotion of staff because these convey the real values of an organisation.

## Conflict of Interests: Insights from the private sector

Jeremy Pope

Most conflicts are destructive, without any good intent for the common objective of the society. But because human interests are as varied as the number of persons, conflict of interests is inevitable in any society or organisation. Thus, what matters is not how to prevent conflict of interests in an organisation, but how to manage it when it does arise. In this regard, the reform driver must:

- be open and follow right procedures for doing things
- know that openness, by itself, does not remove pressures
- know that it is often impossible to 'prove' a *superior* alternative
- understand and demonstrate the importance of leadership and mutual commitment. Leadership is by example, even in situation of demonstrating the superiority of one objective or opinion to another.

It is trite to mention here that the code of conduct for public servants appropriately address the issue of personal interests and public interest. Accordingly, the code of conduct states that:

*A public officer shall not put himself in a position where his personal interest conflicts with his duties and responsibilities.*

*A public officer shall not ask for or accept property or benefits of any kind for himself or any other person on account of anything done or omitted to be done by him in the discharge of his duties.*

*. . . Receipt by a public officer of any gifts or benefits from commercial firms, business enterprises or persons who have contracts with the government shall be presumed to have been received in contravention of the said sub-paragraph unless the contrary is proved.*

*A public officer shall only accept personal gifts or benefits from relatives or personal friends to such extent and on such occasions as are recognized by custom. [emphasis mine]*

### **Why are we here?**

This is a question every public officer must try to answer in the performance of his constitutional duties. Why are we doing what we do? Who are we dealing with in this matter? Whose interest is at stake? Whose interest is somewhat insignificant in this matter? Are we to serve ourselves and, thereby, rob the public? If we are public officers, who are the public? What are we supposed to do in every circumstance? Should we serve ourselves in the interest of the public or should it be vice versa?

### **What is 'the public interest'?**

This is also a very important, albeit, defining question. Is there a 'Nigerian public interest? If yes, what is it? How can it be pursued without bias? Where does it rank, compared with the interests of other Nigerians? Is the 'Nigerian public interest' paramount when it comes to decision-making in the public sector?

### **Personal/ business interests**

Is it right for a public officer to run a personal business? If yes, is it right for his business to trade with his ministry? What are the reasons in favour of this argument? What are the reasons against the argument? What if his business interests are in consonant with those of his ministry? What if his business interests are not in agreement with those of his ministry? These are the various questions that must be answered, not only in this forum, but also individually; otherwise, a situation of conflict of interests would arise.

Conflict of interests:

- creates unfair or biased judgement
- removes the advantages due to the public
- erodes integrity of administration
- might mean that policy matters would not be handled professionally

Do conflicts matter? As mentioned earlier, conflicts of interests are inevitable in any human society. The best way to manage them is by turning the situation around; putting oneself at the receiving end of an action. If I were applying for this job, what would I expect from my would-be employer? If I were applying for promotion, what are those things I wouldn't expect from my superiors? If I were tendering for a contract, what matters would I consider illegal and not-becoming for the owner of the project? The answers we provide for these questions go a

long way to address how we should react in such conflict situations, especially when we hope to maintain integrity and fight against corruption.

Furthermore, every manager or officer should ask him/herself, while performing his constitutionally-assigned duty, the following questions:

- What do I or my relatives stand to gain from this transaction?
- Could there be future benefits for me?
- Would I be ashamed of myself if everyone got to know of my involvement?
- Would this transaction make a fair and reasonable person to doubt my integrity and capacity to be honest?
- Is the process 'fair' to all concerned?
- Am I confident of my ability to act impartially and in the public interest?
- Is legal advice needed?
- Is the matter controversial?

The measures enumerated above are protective rather than destructive measures. It is in the interest of the manager or public servant to disclose and record the area of conflict in every transaction or decision. If the area of conflict is a minor one, he should ask if others concerned have agreed that the decision or transaction could continue notwithstanding. If it is major, he should be bold enough to stand aside from taking any decision or making negotiations, until the conflict is resolved. And when this is done, there should be clear record (by way of proper documentation) of the resolution. The manager or officer should not only 'advise' that the conflict be resolved, but should in fact insist it is done, and should, as much as possible, facilitate the resolution process. Finally, he should operate in a transparent manner, making every procedure as open as possible.

### **The advantages of gift registers**

A gift register should be established in every ministry or organisation for those 'at risk', not for all. This is mainly because it:

- protects the honest by ensuring disclosure
- facilitates risk management
- the 1999 constitution, in the fifth schedule, Part 1(6) entitled Code of Conduct for public officers Part 6(1) prohibits public officers from asking for or accepting any property or benefits of any kind for himself or any other person in the discharge of his duties.

But then, how does one treat major gifts made to one at ceremonies, such as birthdays, burial ceremonies of loved ones, thanksgivings, etc?

*. . . Any gift or donation to a public officer on any public or ceremonial occasion shall be treated as a gift to the appropriate institution represented by the public officer, and accordingly, the mere acceptance or receipt of any such gift shall not be treated as a contravention of this provision . . . [emphasis mine]*



## **Part 4**

# **Syndicate Groups' Presentations**

## **Group 1 Presentation**

With regard to reform, the group identified three key integrity problem areas in the public service:

- i. Inadequacies/defects of system control
- ii. Human factors
- iii. Inadequate deterrence

The Group consequently proffered the following solutions and recommendations:

- a. The reform process should be decentralized and internalized within the routine civil management process.
- b. The due process mechanism should be domiciled in the civil service.
- c. The fallacy in the alleged interrelationship between poor remuneration and corruption was debunked because the highest corruption levels were found in high remuneration cadres. The group identified the imperative for remuneration review in the civil service and for recruitment of more skilled /competent staff.
- d. The current procedure for transacting government business was discovered to be wasteful; hence it should be modernized through the introduction of e-governance.
- e. The group identified the lack of transparency in the current public sector procurement policy which has the potential for breeding corruption. It thus recommended it be opened up to allow unfettered access to procurement information, and this should also be properly packaged.
- f. There should be performance targets, with clear and practical thresholds; and these should be achievable. Also, prices of projects should be standardized.
- g. Whereas reform is welcome, it should be pursued in a manner which would not be punitive. In other words, it should not be to punish and scare away hardworking staff, rather it should reward deserving staff.

- h. As a way out of the identified credibility perception problem in the public service, the group recommended the introduction of:
  - i. integrity training
  - ii. codes of conduct and training
  - iii. Reward for staff with integrity
- i. Internal rules must be enforced; institutions such as EFCC, ICPC, and Code of Conduct Bureau, that are in the forefront of the crusade against corruption should be strengthened.
- j. The roles of recruitment, promotion and posting in the public service must be enforced fairly and equitably.
- k. Due process must be upheld at all levels.

## **Group 2 Presentation**

### **Identified obstacles to reform**

Apart from political issues and the bureaucratic mechanisms in government, the group identified some obstacles to reform. In summary, these include:

- inadequate political will
- interference by politicians
- social /values issues
- wrong public perception
- collapse of ethical value system
- decline of moral education
- general indiscipline
- lack of adequate training for civil servants
- social/peer pressure
- leadership issues
- double standards
- lack of accountability
- poor sanction system
- delay in handling corruption cases
- victimisation
- financial /economic issues
- inadequate infrastructure
- late release of funds
- poverty
- poor reward system

### **Solutions**

#### *Leadership issues*

- Leadership should be by example at all levels. Officers and members of the management team should be careful about their behaviour in and out of office, especially in the presence of junior officers or other members of staff.
- In the case of corrupt officers or those caught in corrupt practices, their names should be published openly. This would deter others from engaging in corrupt practices and, thus, encourage integrity.

- There should not be double standards, nor sacred cows. What applies to Paul should also apply to Paul.
- There should be appropriate reward or merit system. This would encourage improved performance; hence, efficiency and effectiveness.
- Also, there should be a strong enforcement mechanisms for rules and regulations.

#### *Social/value system*

- The entire value system should be reoriented at all levels. The emphasis should not only be on the value system but also on rationale behind every value upheld.
- This is, however, a key role for the media, traditional rulers and religious leaders within the society.

#### *Judiciary*

The judiciary should give corruption cases priority. There should be judicious and expeditious handling of cases involving corruption, especially among government officials.

#### *Political*

- There should be a credible electoral system in place, including electoral tribunals to handle disputes arising from elections and electoral processes.
- The government should mobilize, reorient, and educate the political class on their moral, ethical and social responsibilities to the society.
- There is also the need to formalize the induction system for legislators.

#### *Financial*

- All existing financial rules, codes of conduct and laws should be enforced in a transparent manner; this should not be done in a suspicious manner, that could cause members of the public to label it as 'vindictive'.
- The government should ensure timely release of funds for projects and salaries or other expenditures.
- There should also be in place a realistic remuneration system, that would be commensurate with the inflation rate

### **Action plan**

Every leader, especially government officials, must accept to be an agent of change. It should not be 'business as usual'. This is why it is imperative for seminar participants to sensitize their staff at all levels on things learnt at this seminar (within the next one month). Also:

- Each unit should prepare and launch a strategic action plan on reforms and anti-corruption programmes (within one month).
- There is the need to reform the anti-corruption unit in each organisation.
- There should be independent (external) membership to ICPC and EFCC.
- Each organisation should institute an anti-corruption code of conduct and service charters.
- There is need to organize similar workshops for permanent secretaries and ministers on anti-corruption and reforms; and for chairmen of committees of the National Assembly.
- Special courts should be created to aid accelerated prosecution of cases involving corruption, especially among government officials.
- The computerization of information systems in the various organisations and departments should be accelerated.

## Group 3 Presentation

### Identified obstacles to reforms

- widespread corruption, especially in government business, which has made the fight against corruption a near-impossible task
- interference from the political class arising from regime change
- over-centralization of reform mechanism
- lack of public understanding of the benefits of reforms within the ministries and departments
- the application of double standards in dealing with corrupt officials, which has led to the 'sacred cow' syndrome
- the fear of witch-hunting by whistle-blowers
- the disconnect between anti-corruption units in the ministries and agencies and the reform process
- a weakened public service system and its working ethics
- fear of the unknown
- too much centralization of the reform mechanisms
- the lack of capacity to enforce or implement reform programmes

### Solutions

#### *Widespread corruption*

There should be sustained education and enlightenment campaigns at all levels of ministries and extra-ministerial departments. Also, regular institutional reviews should be carried out to identify system weaknesses and recommend rules and regulations to address these weaknesses.

#### *Political interference*

- There is the need for a clear separation of functions; and this should form part of the orientation programme for political office holders
- Political parties should draw a code of ethics to be subscribed to by all elected and appointed political office holders. Political parties should also develop the capacity to enforce the rules or the code of ethics so subscribed.
- There is a need to organize a similar retreat on organisational integrity and strategic corruption control for political office holders.

*Double standards*

There should be no discrimination in the application/enforcement of rules and regulations. Public service rules should be made applicable to all public servants, without exceptions.

*Fear of witch-hunting*

Although whistle-blowing is often encouraged by the management, most people fear that they could be victimized if they dare point accusing finger at any superior officer. Consequently, there should be enough protection for all whistle-blowers; genuine complaints should be encouraged, while malicious ones should be discouraged.

*Disconnect between anti-corruption units in ministries and departments and the reform process*

- Anti-corruption units should be appropriately situated in ministries and agencies for effective performance.
- Members of anti-corruption units in all ministries and departments should be trained. They should not be made a tool for witch-hunting.
- Their job description and responsibilities should be properly defined.
- Resources should be provided for their operations.
- They should be given a free hand to operate.
- Members of the unit should be given adequate protection.
- They should undertake regular review of organisational operations and recommend improvements.

*Weak systems ie. non enforcement of rules and regulations*

The existing rules and regulations should be enforced through a reward system and the application of sanctions where necessary. It is also pertinent that laws and regulations limiting cash transactions be enforced.

*Over-centralization of the reform mechanism*

The reforms to enhance organisational integrity and strategic corruption control should not be the affair of the federal government alone. States and local governments should also be encouraged to embrace them.

*Lack of capacity of enforcement agencies*

Enforcement agencies should be strengthened and empowered to adequately handle the various reform matters, especially with regard to their implementations. Their functions and responsibilities should also be streamlined to reflect the broad spectrum of the reform agenda.

*Better access to information*

Ministries and departments should make greater use of information technology in their transactions as a way of enhancing information flow and encouraging transparency and probity.

*Public responsibility*

The general public should be made aware that the success of the reform is a collective responsibility for the benefit of all. Individual ministries and agencies should develop strategic plans for the implementation of the recommendations made by this retreat.

## **Group 4 Presentation**

The group considered the obstacles to the crusade against corruption and proffered the following solutions:

- The reward for integrity should be a factor to be considered, especially in the promotion of staff.
- Information about public sector operations should be provided by the various government establishments.
- There is a compelling need for the reorientation of national/societal values and attitudes to discourage corrupt practices/ influences.
- The culture of strategic planning should be imbibed at the highest levels, especially as they affect budgeting, monitoring and evaluation of these reform programmes.
- The need for consistency in policy decisions and implementation as well as right values at the leadership level must be imbibed.
- A system of reward and incentives must be introduced and sustained.



## Appendix 1

### Analysis of Questionnaire Results

#### Sample of the Questionnaire

(To be completed and returned not later than 6p.m. today, Saturday, 11<sup>th</sup> September. Please rate the statements on the following scale:

[1] Agree strongly [2] Agree somewhat [3] Disagree somewhat [4] Disagree strongly

1	Ethics are crucial to the success and legitimacy of the public service	1	2	3	4
2	Ethics come second to actually delivering departmental objectives	1	2	3	4
3	Corruption is an impediment to attaining my departmental objectives	1	2	3	4
4	Corruption is a significant risk in my department	1	2	3	4
5	Corruption is a major problem for my department's clients	1	2	3	4
6	Corruption is a major problem for the staff themselves	1	2	3	4
7	Corruption cannot realistically be reduced in the coming 2 years	1	2	3	4
8	My department has a clear commitment to fighting corruption	1	2	3	4
9	Individual promotion should be partly assessed in terms of integrity	1	2	3	4
10	Managing the integrity of my subordinates is not part of my responsibilities	1	2	3	4
11	The public sector should operate by a higher set of ethical standards than the private sector	1	2	3	4
12	Corruption in the public service has been significantly reduced in the past 2 years	1	2	3	4
13	Conflict of interest rules are commonly ignored	1	2	3	4
14	My department has clearly identified the areas most vulnerable to corruption	1	2	3	4
15	My department has an ethics code	Yes		No	
16	My department has an anti-corruption unit	Yes		No	

17	My department has a risk management committee (or something similar)	Yes	No
18	My department staff receive ethics training	Yes	No
19	Anti-corruption components are included in new programme designs.	Yes	No
20	In the past two years, my department has conducted surveys to determine corruption levels.	Yes	No
21	In the past two years, my department has conducted surveys of clients to determine levels of client satisfaction	Yes	No

22. Rank order (1-8) the following in order of importance to controlling corruption levels in the public service in Nigeria in the coming two years (where 1 is most important):

Leadership by example [     ]

Swift and fair sanctions of the guilty [     ]

Setting of higher standards (codes, etc.) [     ]

Improved enforcement training [     ]

Improved institutional accountability and monitoring [     ]

Increase salary levels for public officials [     ]

Pressure from the public [     ]

Pressure from international organisations [     ]

23. Rank order (1-8) the following in order of importance to increase integrity standards in the public service in Nigeria in the coming two years (where 1 is most important):

Leadership by example [     ]

Swift and fair sanctions of the guilty [     ]

Setting of higher standards (codes, etc.) [     ]

Improved enforcement training [     ]

Improved institutional accountability and monitoring [     ]

Increased salary levels for public officials [     ]

Pressure from the public [    ]

Pressure from international organisations [    ]

24. Of the following, which is most important to controlling corruption (mark one):

Enforcement and punishment [    ]

Prevention [    ]

Both are equally important [    ]

25. In a few words, what are your major current concerns in terms of organisational integrity and corruption control in your department?

26. Which ministry, department, corporation or other state entity do you work for?







## Appendix 2

### Presentation of Results in Charts

Keys for figures 1 - 14: 1 = agree strongly; 2 = agree somewhat; 3 = disagree somewhat; 4 = disagree strongly

*Note:* Each chart is a graphic representation of responses to each question in the questionnaires.

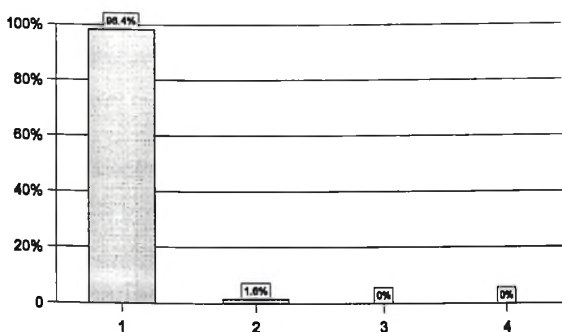


Figure 1. Ethics are crucial to the success and legitimacy of public service

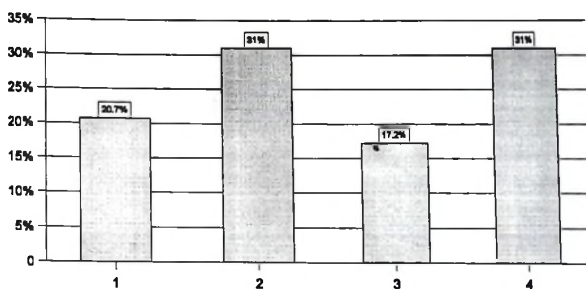


Figure 2. Ethics come second to delivering departmental objectives

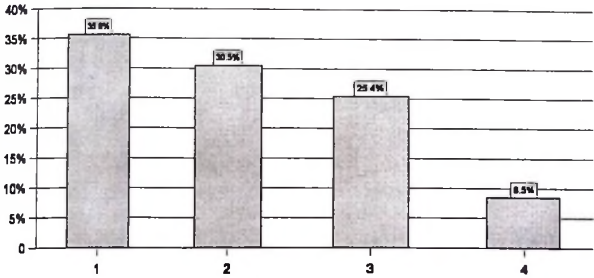


Figure 3. Corruption is an impediment to attaining my departmental objectives

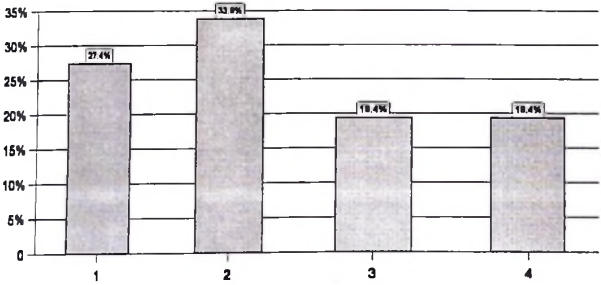


Figure 4. Corruption is a significant risk in my department

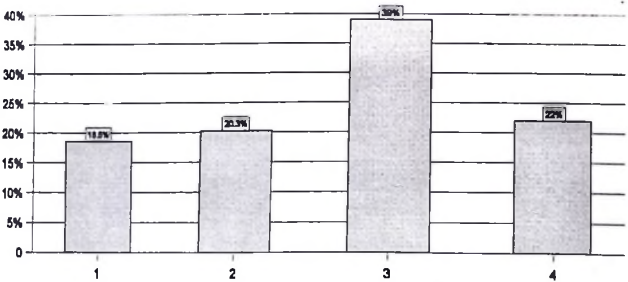


Figure 5. Corruption is a major problem for my departments clients

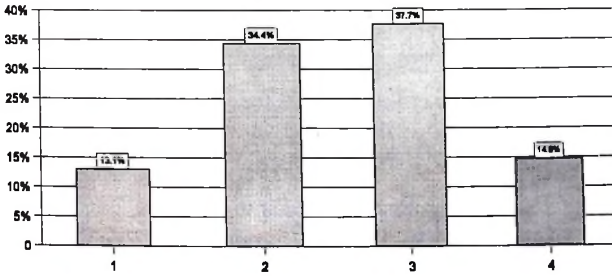


Figure 6. Corruption is a major problem for the staff themselves

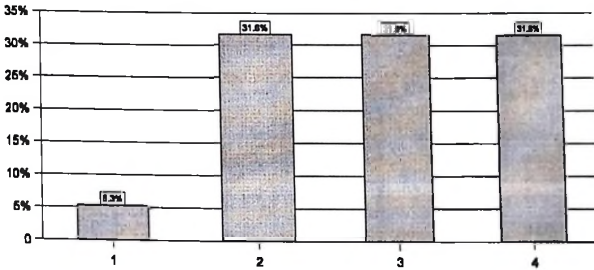


Figure 7. Corruption cannot be realistically reduced in the next 2 years

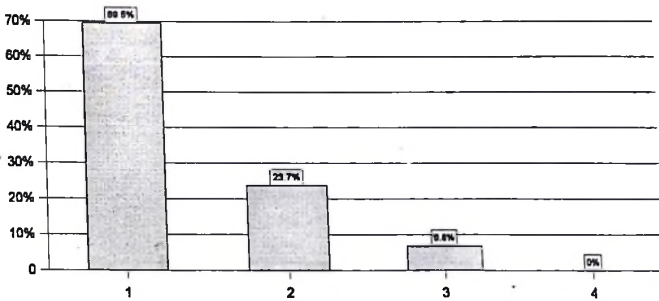


Figure 8. My department has a clear commitment to fighting corruption

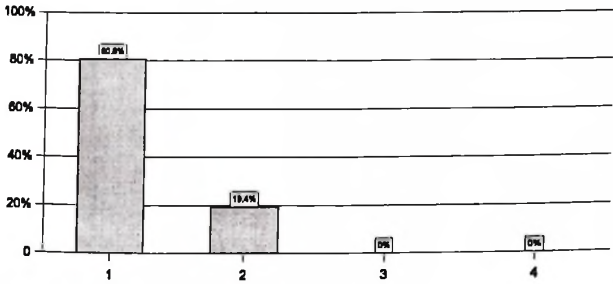


Figure 9. Individual promotion should be partly in terms of integrity

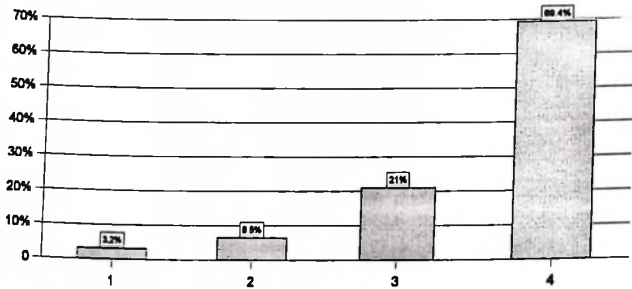


Figure 10. Managing the integrity of my subordinates is not part of my responsibilities

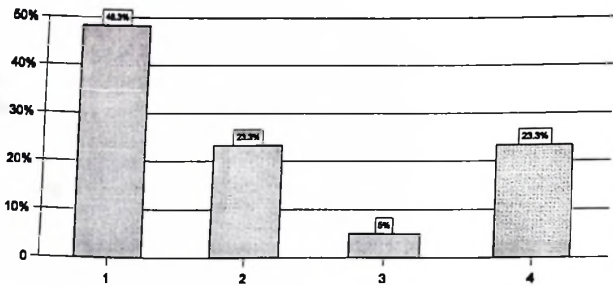


Figure 11. The public sector should operate under a higher ethical standards

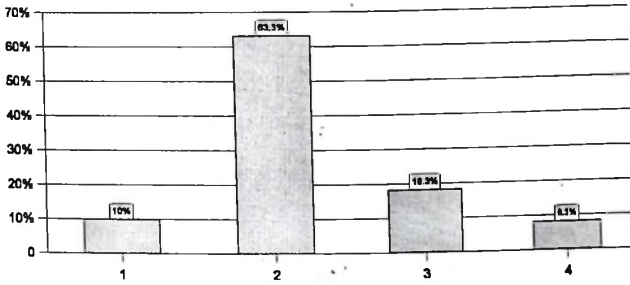


Figure 12. Corruption in the public service has been significantly reduced in the last 2 years

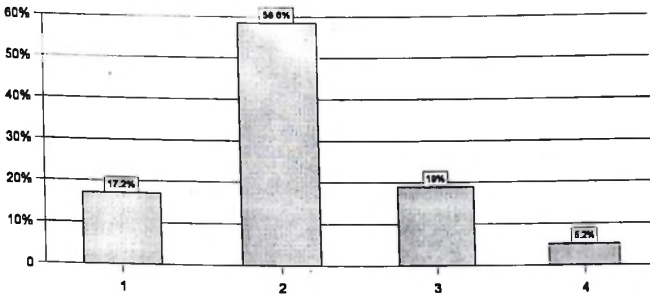


Figure 13. Conflict of interest and rules are usually ignored

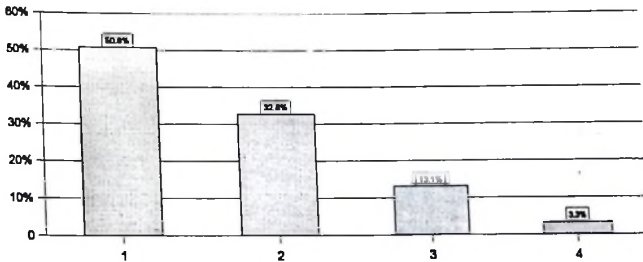
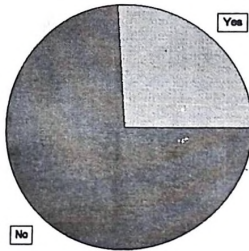
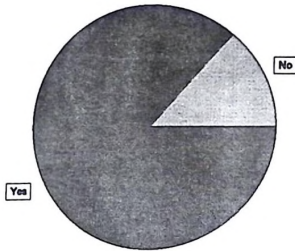


Figure 14. My department has clearly identified the areas that are most vulnerable to corruption



**Figure 15.** My department has an ethics code



**Figure 16.** My department has an anti-corruption unit

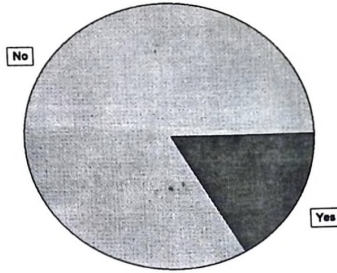


Figure 17. My department has a risk-management committee

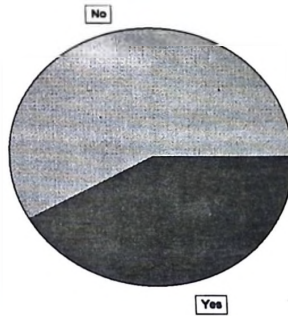


Figure 18. My department's staff receive ethics training

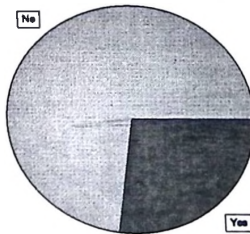
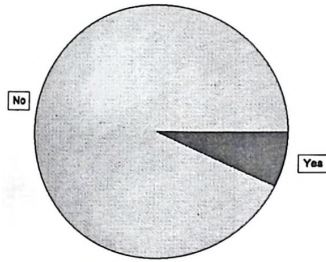
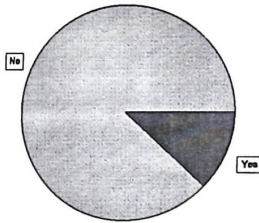


Figure 19. Anti-corruption components are included in new programme designs



**Figure 20.** In the past 2 years, my department has conducted surveys of clients to determine corruption level



**Figure 21.** In the past 2 years, my department has conducted surveys to determine levels of clients' satisfaction

## Invitation/ Attendance Status

List of organisations and designation of officials and participation status

Organisation/ Designation	Name	Official Address	Status of Attendance
<i>Agriculture &amp; Rural Development</i> Permanent Secretary	O.O.O. Ogunkua; OON	Federal Ministry of Agriculture and Rural Development	Attended
Director, Rural Development	Engr. E. O. Okeke	Federal Ministry of Agriculture and Rural Development	Attended
Director, Planning, Research & Statistics	Aliyu Mohammed	Federal Ministry of Agriculture and Rural Development	Attended
<i>Aviation</i> Permanent Secretary	T. D. Oyelade	Ministry of Aviation, Abuja	Attended
Managing Director, (FAAN)	Engr. Mohammed Gambo Umar, mni	FAAN Headquarters, Lagos	Attended
<i>Commerce</i> Permanent Secretary	Ms. A. Pepple	Federal Ministry of Commerce	Could not attend
Director, Domestic Trade	William Adebayo	Federal Ministry of Commerce, Garki, Abuja	Attended
<i>Communications</i> Permanent Secretary	Umar Abubakar	Federal Ministry of Communications	Attended
Director, Finance & Supply	A.G. Salami	Federal Ministry of Communications	Attended
Director, Mining, Research and Statistics	Dr. S. A. Sufi	Federal Ministry of Communications	Attended
Vice Chairman (NCC)	Engr. E. Ndukwe	Benue Plaza Central Area	Could not attend
Managing Director (NITEL)	Mr. Reinder Zwolsman	NITEL House District Area	Could not attend
<i>Cooperation and Integration in Africa</i> Permanent Secretary	Dr. Etim A. Amba	Ministry of Cooperation and Integration in Africa, IPCR Building, Central Area, Abuja	Attended
<i>Culture and Tourism</i> Permanent Secretary	Alhaji Ibrahim Y. Abubakar	Federal Ministry of Culture and Tourism, Abuja	Could not attend
Executive Director (NTDC)	Mrs. F.O. Oyakhilome	N.T.D.C. Old Federal Secretariat, Area 1, Garki, Abuja.	Attended
<i>Defence</i> Permanent Secretary	O.O. Oyelakin OON	Ministry of Defence, Abuja	Attended

Organisation/ Designation	Name	Official Address	Status of Attendance
Chairman, Military Pension Board	Grp. Capt. Kshiru	Wuse Zone 3	Could not attend
<i>Education</i> Permanent Secretary	I. Talba	Federal Ministry of Education, Federal Secretariat II, Abuja	Attended
Executive Secretary (NUC)	Prof. P. Okebukola	National Universities Commission, Maitama, Abuja	Could not attend
<i>Federal Capital Territory</i> Permanent Secretary	O. A. Omotade	Ministry of Federal Capital Territory, Area 11, Garki, Abuja	Attended
Executive Secretary (FCDA)	Engr. M.S. Alhassan	Ministry of Federal Capital Territory, Area 11, Garki, Abuja	Attended
<i>Finance</i> Permanent Secretary	Dr. H. U. Sanusi	Finance Building, Central Area, Abuja	Could not attend
Chairman, FIRS	Ms. Ifueko Omoigui	Plot 522, Tokode, Crescent Zone 5, Abuja	Attended
Accountant-General of the Federation	J. K. Naiyeju	Office of the Accountant-General of the Federation, Federal Ministry of Finance, Garki, Abuja	Attended
Auditor-General for the Federation	Mr. J. A. Ajiboye	Office of the Auditor General of the Federation, Wuse Zone 2	Attended
<i>Foreign Affairs</i> Permanent Secretary	Amb. N. U. O. Wadibia-Anyanwu, mni	Ministry of Foreign Affairs	Attended
<i>Health</i> Permanent Secretary	Alhaji Umaru Aji	Ministry of Health	Could not attend
Director, Finance & Accounts			Could not attend
Director-General (NAFDAC)	Dr. Dora Akuyili	NAFDAC Hq. Zon 7, Abuja	Could not attend
National Coordinator (NPI)	Dr. (Mrs.) Dere Awosika	NPI Headquarters, Plot 1226 Ahmadu Bello Road, Garki 11, Abuja	Attended
Executive Secretary (NHIS)	Muhammed Mustapha Sambo		Could not attend
<i>Housing &amp; Urban Development</i> Permanent Secretary	Arc. J.L.S. Alkali, FNIA	Federal Ministry of Housing and Urban Development, Mabushi, Abuja	Attended

Organisation/ Designation	Name
Managing Director (FHA)	
<i>Industry</i> Permanent Secretary	Engr. Gideon O. Asiogbu
<i>Information &amp; National Orientation</i> Ag. Permanent Secretary	A. D. Gidado
Director-General (NOA)	Mallam Idi Farou
Director-General (NTA)	Dr. Tony Iredia
Director-General (FRCN)	Mr. Eddy Iroh
Director-General (NBC)	Dr. S. B. Yisa
<i>Internal Affairs</i> Permanent Secretary	Mrs. T. A. Iremiren
Ag. Controller - General (NIS)	Musa A. Baray
Controller-General (NPS)	Mr. A. I. Akp mni
<i>Environment</i> Permanent Secretary	S. O. Adekun
<i>Justice</i> Solicitor-General/ Permanent Secretary	Prof. I. Ayua
Chairman/Chief Executive (NDLEA)	Alhaji Dr. B. Lafiaji OON
<i>Labour &amp; Productivity</i> Permanent Secretary	Dr. Timiebi Koripamo-A
<i>National Planning Commission</i> Permanent Secretary	Dr. Muazu Babangida
<i>Police Affairs</i> Permanent Secretary	Grace I. Archibong OON

Organisation/ Designation	Name	Official Address	Status of Attendance
Director, Administration	Aisha I. Dankani	Ministry of Police Affairs, 8 <sup>th</sup> Floor, Federal Secretariat, Abuja	Attended
<i>Solid Minerals Development</i> Permanent Secretariat	Dr. Aboki Zhawa, OON	Ministry of Solid Minerals Development, Federal Secretariat, Shehu Shagari Way, Abuja	Attended
Director-General (Geological Surveys)	Siyan Malomo	Plot 360, Adetokunbo Ademola Crescent, Wuse 11, Abuja	Attended
<i>Science and Technology</i> Permanent Secretary	Dr. Abdullahi Aliyu	Fed. Ministry of Science & Technology, 9 <sup>th</sup> Floor, Federal Secretariat, Abuja	Attended
Director-General (NITDA)	Prof. G. O. Ajayi	Plot 695, Port-Harcourt Crescent, Area 11, Garki Abuja	Attended
<i>Transport</i> Permanent Secretary	Mr. N. B. Danbatta, mni	Fed. Ministry of Transport	Could not attend
Director (Transport & Land) For Permanent Secretary	J. E. Ijeruh	Fed. Ministry of Transport, Bukar Dipchariya House, Central Area, Abuja	Attended
Director-General (NMA)			Could not attend
Director-General (NPA)	A. B. Sarumi	Nigeria Ports Authority, Lagos	Attended
<i>Women Affairs</i> Permanent Secretary	Oloche A. Edache	Federal Ministry of Women Affairs, Federal Secretariat Complex, Abuja	Attended
<i>Water Resources</i> Permanent Secretary	Dr. C. J. G. Orjioko, OON	Federal Ministry of water Resources, Area 1, Garki, Abuja	Attended
Director, Water Supply	M.A.K. Abubakar, MFR	Fed. Ministry of Water Resources, Area 1, Garki	Attended
<i>Works</i> Permanent Secretary	Dr. H. Baba-Ahmed	Federal Ministry of Works, Mabushi District, Abuja	Attended
Director, Highways	Engr. D. K. Jime	Federal Ministry of Works, Mabushi District, Abuja	Attended
<i>Petroleum Resources</i> Permanent Secretary	Mrs. A. Lawan - Ali	Petroleum Resources, Abuja	Could not attend
Group Managing Director (NNPC)	F. M. Kupolokun	NNPC Towers, Abuja	Attended

Organisation/ Designation	Name	Official Address	Status of Attendance
<i>Power and Steel</i> Permanent Secretary	Engr. S. M. Mahmood	Fed. Ministry of Power and Steel	Could not attend
Managing Director (NEPA)	J. O. Makoju	NEPA Headquarters, Maitama, Abuja	Attended
<i>Sports and Social Development</i> Permanent Secretary	Solomon Danasabe Matankari	Fed. Ministry of Sports and Social Development, Federal Secretariat Complex, Phase 1, Abuja	Attended
Director, Sports Development	Chief Pat. C. Ekeji	Fed. Ministry of Sports and Social Development, Federal Secretariat Complex, Phase 1, Abuja	Attended
<i>State House</i> Principal Secretary/Permanent Secretary	Stephen Oronsaye, OON	State House, Aso Villa, Abuja	Attended
Director, Administration	Eyo-Nsa Whiley	State House, Aso Villa, Abuja	Attended
Director, Finance	Daniel Osayi	State House, Aso Villa, Abuja	Could not attend
<i>Office of the Secretary to the Government of the Federation</i> Permanent Secretary (GSO)	Dr. B.K. Kaigama, OON	General Services Office (OSGF)	Attended
Permanent Secretary (CS)	Rev. P. Okunromade	Cabinet Secretariat, (OSGF)	Could not attend
Permanent Secretary (EAO)	Alhaji Ibrahim Abubakar	Economic Affairs Office (OSGF)	Could not attend
Permanent Secretary (PAO)	R. U. Audu	Political Affairs Office, OSGF, The Presidency, Federal Secretariat, Phase 1, Abuja	Attended
Permanent Secretary (SSO)	B. U. Maitambari	Special Services Office, OSGF, The Presidency, Federal Secretariat, Phase 1, Abuja	Attended
Permanent Secretary (NAPEP)	Garba Buwai, mni	Federal Secretariat, Block 'B', Phase II, Abuja	Attended
Permanent Secretary (Ecological Funds)	Dr. Safiya I. Muhammad	Ecological Funds Office, Bullet Building, Federal Secretariat, Phase II, Abuja	Attended
Director, Administration	B. J. Osajuyigbe	General Services Office, OSGF, Federal Secretariat, Abuja	Attended
Director, Finance & Accounts	E. O. Chine	General Services Office, OSGF, Federal Secretariat, Abuja	Attended

Organisation/ Designation	Name	Official Address	Status of Attendance
Director-General (PPPRA)	Dr. Oluwole Oluleye	Plot 1631 Sankuru Close Off Gurara/Rima Streets, Maitama, Abuja	Attended
<i>Office of the Head of Service of the Federation</i> Permanent Secretary (PSO)	Mr. David Waminaje	Public Service Office (OHSF)	Could not attend
Permanent Secretary (MSO)	Dr. O. Ogunbambi, mni	OHCSF, Federal Secretariat, Phase II, Abuja	Attended
Permanent Secretary (SWO)	T. D. Hart	OHCSF, Federal Secretariat, Phase II, Abuja	Attended
Permanent Secretary (Estab. and Pensions)	Alhaji S. A. Sulaiman, OON	Estab. and Pensions Office (OHSF)	Could not attend
Director, Administration	Mrs. G. O. Titilope	OHCSF, Federal Secretariat, Phase II, Abuja	Attended
Director, Finance & Accounts	A. P. Otakwu	OHCSF, Federal Secretariat, Phase II, Abuja	Attended
Ag. Director, Pensions & Records	M. H. Fa'izu Saleh	OHCSF, Federal Secretariat, Phase II, Abuja	Attended
Director-General (Pension Commission)	Mr. M. K. Ahmad	-	Could not attend
<i>Independent Corrupt Practices and Other Related Offences Commission</i> Chairman	Justice M.M.A. Akanbi, CFR	Plot 809 Constitution Avenue, Central Business District, Abuja	Attended
Secretary	Dr. T. B. Ingawa, mni	Plot 809 Constitution Avenue, Central Business District, Abuja	Attended
<i>Economic and Financial Crimes Commission</i> Chairman	Mr. Nuhu Ribadu	Aso Villa	Could not attend
<i>Federal Civil Service Commission</i> Chairman	Amb. A. Algazali	Abidjan Street, Wuse, Zone 3, Abuja	Attended
Permanent Secretariat	L. C. Ibe	FCSC, 3 Abidjan Street, Zone 3, Wuse - Abuja	Attended
<i>Code of Conduct Bureau</i> Secretary	S. I. Saba	Code of Conduct Bureau, P.M.B. 155, Abuja	Attended
<i>Police service Commission</i> Permanent Secretary	A. A. Bamanga	Ground Floor, Federal Secretariat (Phase I), Maitama, Abuja	Attended

Organisation/ Designation	Name	Official Address	Status of Attendance
<i>National Judicial Council</i> Executive Secretary	Danladi Halihu	National Judicial Council, Supreme Court, Abuja	Attended
<i>Independent National Electoral Commission</i> Secretary	Mr. A. B. Jauro	Zambezi Crescent, Maitama, Abuja	Attended
<i>National Salaries, Income and Wages Commission</i> Permanent Secretary	J. O. Ogunleye (Mrs.)	Federal Secretariat Complex, Phase I, Shehu Shagari Way, Abuja	Attended
Director, Productivity, Prices and Incomes	Mrs. I. Onayemi	NSIW Commission	Could not attend
<i>National Population Commission</i> Director-General	Dr. Adebola Akinsanya	National Population Commission, Wuse, Zone 7, Abuja	Attended
<i>National Assembly</i> Clerk of the Senate	Yemi Ogunyomi	National Assembly (Senate)	Attended
Clerk of the House of Representatives	C. O. Nwosah	House of Representatives, National Assembly, P.M.B. 141, Abuja.	Attended

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**BPSR**  
BUREAU OF PUBLIC SERVICE REFORMS  
THE PRESIDENCY  
FEDERAL REPUBLIC OF NIGERIA