ANTI CORRUPTION ACADEMY OF NIGERIA

CORRUPTION PREVENTION TRAINING MANUAL

European Union

UNODC
United Nations Office on Drugs and Crime

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Disclaimer

ACKNOWLEDGEMENTS

INTRODUCTION

There is widespread consensus on the disastrous consequences of corruption, evidenced in many cross country studies (Lambsdorff 2007). This has called for action. For more than 20 years, anti-corruption has been on the agenda of governments, companies and international organizations. As Africa's most populous country and as one of the world's fastest-growing economies, Nigeria is not immune to corruption challenges. Strengthening integrity and reducing corruption has been a priority for Nigeria for a number of years. Corruption continues to be a significant impediment to economic growth and social advancement while discouraging business investments, adding to the high cost of doing business and undermining the confidence of the people of Nigeria in its own governance and rule of law.

Various reports on Nigeria have highlighted the reactive position of the Anti-Corruption Agencies (ACAs) towards fighting corruption and the fact that this been largely on law enforcement, while preventive mechanisms and public education and support have been underused and under-resourced. This is problematic given the sophisticated nature of corruption in Nigeria and the difficulty of detection. A predominantly enforcement focus neglects the potentially effective area of prevention which, given the low cost baseline starting point, could yield significant benefits at comparatively low cost. There is an obvious lack of strategies to prevent the underlying causes of corruption as well as of coordination among ACAs with complementary mandates on anti-corruption prevention.

Developing strategies for preventing corruption will also call for building capacities of ACAs in areas like integrity building within the system and putting in place structures that ensure probity and promotes accountability in the conduct of public administration.

This training manual is an attempt to lay a foundation for capacity building in corruption prevention and has been designed to cover all leading themes in corruption prevention, expose participants to rigorous theoretical knowledge and practical hands-on in corruption prevention experience. Its target participants, who must have current or prior experience in related anti-corruption and oversight work, include staff of Nigeria's Anti-Corruption Agencies, public and business establishments, civil society organizations, academic institutions, etc.

INDEX OF TRAINING TOOLS

Focus boxes	Readers are introduced by a series of boxes to topics of specific interest, providing in-depth background information or illustrative examples and allowing a comparative approach to the subject.
Interviews	Internet links to filmed interviews with experts have been included as part of a practically-oriented training approach.
Practical guidance	Frequent practical guidance has been included to encourage trainers to adopt a concrete and practical approach.
Case studies	These are real and fictitious scenarios designed to aid understanding and stimulate discussion of the legal issues raised in each section and to inject a practical perspective. Some of the case studies straddle several sections of the module, and can either serve as "mini" case studies for working on specific issues or be brought together as a single whole. When using the fictitious case studies, trainers should limit their role to that of moderator, promoting an exchange of views rather than teaching as such. Participants should be encouraged to study the various scenarios with the help of the relevant legal texts.
Activities	These boxes offer ideas for exploring how the various topics covered in the module are handled or reflected in the legal system and practice of the participants' countries. Participants are encouraged to apply their skills and share their experience with reference to specific topics. During workshops, trainers may propose an activity to stimulate an initial discussion among participants. Persons studying independently will also be able to use the activity boxes to focus on the practical application of knowledge acquired.
Assessment Questions	There are tests on the topics covered in each section. Unlike the activities, assessment questions tend to require straightforward answers, making them a useful tool for trainers who need to quickly assess the level of knowledge acquired by participants. The assessment typically takes place at the end of a training session, but can also serve as a preliminary tool to identify training needs, delivery methods and the level of competence of participants.
Tools	This section offers teaching materials to assist criminal justice practitioners. It includes practical guides, manuals, treaties and model laws, databases and sources, for a comparative law perspective. Website links have been added under each tool to enable practitioners to access them with just one click.

Further reading	A condensed bibliography for trainers aimed at broadening their knowledge on specific legal issues.
Supplementary material	PowerPoint presentations produced and used by UNODC provide a visual aid to trainers when they give oral presentations on various topics. The presentations are meant to provide inspiration to trainers, but should not be used without being adapted in each case. This type of material also includes copies of actual legal assistance and extradition requests, where available to trainers.
Reference	There is inevitably a degree of overlap between the modules because the topics under consideration are often interrelated. In some cases, the same topic is examined from different angles in two or more modules. In other words, there are many ways of looking at the same subject. This should not be seen as a drawback, but rather as an asset enabling trainers to arrange tailor-made activities depending on specific training needs. For example, in preparation for a training workshop, the need may arise to cover certain issues more in depth, to analyse them from multiple perspectives, or to examine their connection with others. The symbol, along with links to parts of the same module, is used to inform trainers of the location of information covering the same or connected topics.

LIST OF ABBREVIATIONS

ACAN	Anti-Corruption Academy of Nigeria
AML/CFT	Anti Money Laundering and Combating of the Financing of Terrorism
AU	African Union
BPP	Bureau of Public Procurement
CBCN	Catholic Bishops Conference of Nigeria
CCB	Code of Conduct Bureau
CCBS	Crime and Corruption Business Surveys
CEC	Council of Europe Conventions
COSP	Conference of State Parties
CPI	Corruption Perception Index
CRA	Corruption Risk Assessment
DNFI	Designated Non-Financial Institutions
ECOWAS	Economic Community of West African States
EFCC	Economic and Financial Crimes Commission
EU	European Union
FATF	Financial Action Task Force
FCPA	Foreign Corrupt Practices Act
ICAC	Independent Commission against Corruption
ICCBS	International Crime against Business Surveys
ICPC	Independent Corrupt Practices and Other Related Offences Commission
IRB	Institutional Review Board
OAS	Organization of American States
OECD	Organization for Economic Co-operation and Development

<p style="text-align: center;">**CONTENT**</p>

MODULE 1:0   INTRODUCTION TO CORRUPTION PREVENTION

MODULE 2:0   CORRUPTION PREVENTION METHODS AND CASE STUDIES

MODULE 4:0   CORRUPTION RISK ASSESSMENT STUDIES

MODULE 5:0   **BEHAVIOR CHANGE MANAGEMENT**

Chapter   **5.1.0   Consequences of Corrupt Behavior**
         5.1.1.   Nature of corrupt practices (behavior and their consequences)
         5.1.2.   Explanation of corrupt behavior

Chapter   **5.2.0.   Why Behavior is Changed**
         5.2.1.   When is behavior changed?

Chapter   **5.3.0.   How Behavior is Changed and Managed**
         5.3.1.   How is behavior changed?
         5.3.2.   How can change in behavior be sustained?

Chapter   **5.4.0.   Strategy and stages of Change of Behavior**
         5.4.1.   The 4-Stage model of behavior change

Chapter   **5.5.0.   Operant Conditioning**
         5.5.1.   Positive and negative reinforces /punishment
         5.5.2.   Schedules of Reinforcement

MODULE 6:0   **PROJECT DESIGN AND IMPLEMENTATION**

Chapter   **6.1.0.   What is a project?**
         6.1.1.   How is a project designed?
         6.1.2.   Presentation of the case study

Chapter   **6.2.0.   Project identification**
         6.2.1.   Conducting a stakeholder analysis and selecting your target group
         6.2.2.   Analyzing the problem.
         6.2.3.   Analyzing the objectives
         6.2.4.   Selecting your strategy

Chapter   **6.3.0.   Project formulation**
         6.3.1.   Building your logical framework
         6.3.2.   Setting the objectives, outputs and activities
         6.3.3.   Setting up the indicators and means of verification
         6.3.4.   Setting up the key assumptions

Chapter   **6.4.0.   Implementation planning**
         6.4.1.   The work breakdown matrix
         6.4.2.   Responsibility matrix
         6.4.3.   Resource plan and budget

Chapter   **6.5.0.   Planning of monitoring and evaluation**
         6.5.1.   Monitoring plans
         6.5.2.   Planning the evaluation

Conclusion
References
Annexes

MODULE 1:0   **INTRODUCTION TO CORRUPTION PREVENTION**

Chapter   **1.1.0. Perspectives on corruption**
                   1.2.0. Understanding the legal and institutional framework of corruption
                          prevention application
                   1.3.0. Corruption prevention plan

Overview
In topic one, the participants will be introduced properly to corruption and its prevention. Under
this heading, participants will learn the perspectives on corruption, the legal framework
surrounding corruption prevention and its application as well as ways of developing corruption
prevention plan. It is expected that at the end, the participants would have been armed with enough
knowledge that would be useful in following up with subsequent topics and modules. Without
proper introduction, participants in corruption studies would approach it wrongly. Hence,
participants would be provoked into seeing that, just like other social issues, corruption can be
reasonably studied and understood.

General objective
At the end of the topic 1, participants would be able to:
- Define corruption
- Identify the usefulness of corruption study
- Be able to justify the need for corruption prevention
- List and explain the various international and national legislation and institutions on
  corruption
- Develop a corruption prevention plan

Learning Objectives
After this module, participants are expected to
- Define the concept of corruption and its various manifestations
- Identify the various types and ramifications of corruption
- Examine the causes of corruption
- Discuss the consequences of corruption and
- Evaluate the perception of corruption in Nigeria

This first section of the manual has to do with a general introduction of the problem of corruption.
As a problem, corruption is an undesirable condition that affects all Nigerians and foreigners in
Nigeria and even Nigerians in the diaspora, directly or indirectly. There is a general consensus that
something should be done about the nature and widespread incidence of corruption in Nigeria. The
question here is, 'what should be done to stem the tide of corruption in Nigeria.' this first module
will, however, cover the definition, types, causes, consequences and the perception of corruption
in Nigeria.

1.1.1. Introduction

There are several definitions of corruption in the literature, each of which emphasizes different
aspects of the phenomenon (Alemika 2002, 2003). The Dictionary of Social Sciences (1964: 142)
defines corruption as 'the use of ... power for ... profit, preferment, or prestige, or for the benefit

of a group or class, in a way that constitutes a breach of law or of standards of high moral conduct". This definition is one of the few comprehensive descriptions of the concept and its manifestations. Khan's definition of corruption as "... behavior which deviates from the formal rules of conduct governing the actions of someone in a position of public authority because of private-regarding motives such as wealth, power or status", points to the nature of the conduct and the underlying motives (Khan 1996: 12). These definitions highlight the elements of bribery (financial gains) and abuse of office (for non-financial gains) in corruption.   Many definitions of corruption sometimes equate the conduct with bribery. For example, Webster Third International Dictionary (1960) defines corruption as 'a price, reward, gift or favour bestowed or promised with a view to pervert judgment or corrupt the conduct especially of a person in a position of trust'. This means that corruption is a betrayal of trust on the part of a person in a position of authority; both in the public and private sector.

This definition is similar to that offered by Kong, who defined corruption as "the extraction and acceptance of payment from private entities (be they individual citizens or businesses) by public officials, and the private misappropriation and abuse of public funds" (Kong 1996:49). Similarly, Dey (1989:503-504) defined corruption as "any act undertaken with the deliberate intent of deriving or extracting monetary or other benefits by encouraging or conniving at illegal activities". All these definitions focus on bribery. Some other definitions direct attention to the nature and effects of corruption. Friedrich (1966) defines corruption in terms of transaction or exchange between corrupters and corruptees. He observes that:

> corruption can be said to exist whenever a powerholder who is charged with doing certain things, i.e., who is a responsible functionary or officeholder, is by monetary or other rewards not legally provided for, induced to take actions which favor whoever provides the rewards and thereby does damage to the public interests' (Friedrich 1966:74).

What really constitutes a corrupt act is most times socially constructed and subject to interpretation based on the laws of the society in view (UNODC, 2001). Typically, in most countries, there seems to be at least a form of corruption mostly interpreted as "petty" which lower level of administrators use to supplement their income (Mashal, 2011). However, reactions to this in societies varies, some see it as a big scandal while some do not. In Nigeria, bribery is only one form of a corrupt act. Another common form of corruption in the context of Nigeria is nepotism in relation to appointment, promotion or favour, or award of contracts to kinsmen, friends and associates that is widespread in the public sector and private enterprises in violation of subsisting rules. Corruption, therefore may involve three distinct but occasionally conjoint actions: bribery, nepotism and fraud (embezzlement, inflation of costs of services, and forgery).

1.1.2   Definition of corruption - conceptual considerations and concrete offences

In this section, participants will be invited to discuss and define corruption. Past, failed attempts to define corruption in a universally accepted way will be used as examples to delineate the evolution of definitions and thinking. The potential benefits of not having to work with just one definition will also be explained and participants will achieve a broader understanding of corruption, particularly cultural conceptions, so that they may be able to discuss the causes, effects and remedies for corruption later in the course. The way in which corruption manifests itself in

different regions and contexts varies greatly, so a flexible approach allows for comparisons and contrasts as well as functional equivalents. The benefits of a broader concept of corruption will be appreciated by participants who will also consider how a descriptive approach, conceptual consideration, legal definition, categories of corruption, and causes of corruption. Also in this section, there is the need to emphasize major types of corruption offences (public, private, domestic and international) that are defined in domestic law and international instruments.

In addition to the offences in the UN Convention Against Corruption (UNCAC), teachers will introduce participants to corruption offences set out in other regional instruments that are most relevant to Nigeria, including the OECD Convention on Combating Bribery of Foreign Public Officials and the AU Convention, the Council of Europe Conventions, OAS Convention, ECOWAS Protocol and EU instruments. Participants will then analyze the extent to which their domestic corruption offences are similar to and different from the corruption offences in the relevant international instruments. A key focus will be on the extent, if any, to which the participants' domestic law needs to be amended to comply with international standards. Finally participants will compare and contrast domestic corruption offences with corruption offences in other jurisdictions– e.g. one common law country (such as the new U.K. Bribery Act), one civil law country, one sharia law system or one mixed system (examples to be provided/suggested). The corruption laws and relevant provisions from jurisdictions around the word are now available on UNODC's TRACK portal (https://track.unodc.org/LegalLibrary/Pages/home.aspx).

It is not easy to give a precise definition of corruption that meets local and international standards. Nigeria's foremost agency in the fight against corruption, the Independent and Corrupt Practices Commission (ICPC) defines corruption as "bribery, fraud and other related offences" (ICPC, 2008:4). The World Bank (2006) has observed that a situation where public officials accept, solicit or extort bribes, or where private agents actively give bribes to circumvent public policies and processes for competitive advantages or profit, amounts to corruption.

The emphasis on the two definitions above is on bribery. The big question is: what is bribery. Chambers 21st Century Dictionary defines "bribe" as a gift, usually money, offered to someone to persuade them to do something illegal or improper". Bribe occurs within the context of the giver and the receiver; it paves the way for the giver to be favoured in whatever he/she is looking for, regardless of the rules and procedures. The receiver of the bribe is also under compulsion to deliver what the giver has asked for, whether or not the giver merits it.

Transparency International (TI) defines corruption as "the abuse of public office for private gain" (ICPC, 2003:2). It literally means dishonest and illegal behavior exhibited especially by people in authority for their private benefit (Bello-Imam, 2005:182). Focusing specifically on police corruption, Barker & Roebuck, (1973) identified three elements:
(1) The behaviour must be forbidden by law, rule, regulation and ethical standard;
(2) It must involve misuse of the officer's official position; and
(3) The reward must be in money or money's worth (Barker 2006:47).

One may wish to observe that these three elements are not peculiar to police officers; they are also applicable to other public officers. Similarly, some rewards in corrupt cases are sometimes quite difficult to capture in money's worth. For instance, how does one quantify in money's worth a lecturer in the university who sleeps with his students in exchange for higher grades? No wonder Transparency International (2016a) defined it as the abuse of entrusted power for private gain.

1.1.3   Types of Corruption

Scholars and researchers have attempted to delineate different types of corruption. This debate has been extensively handled from different perspectives because of differences in culture on what constitutes a corrupt act. In explaining the types of crime, United Nations Office on Drug and Crime (UNODC) (2001:7- 14) took into account as many voices and perspectives as possible hoping that it will help nations to reassess what it is that they define as corrupt acts that should be prevented and sanctioned. Participants will explain the following concepts and use them confidently: Bribery, fraud, extortion, favoritism, obstruction of justice, embezzlement, misappropriation or other diversions of property by a public official, Illegal political contributions and laundering of proceeds of corruption offences.

- **Bribery**

Bribery involves the promise, offer or giving of any benefit that improperly affects the actions or decisions of a public official. It can also include those who may not be public officials per se, but may also include members of the public who serve on government committees. A bribe may consist of money, company shares, inside information, sexual or other favours, gifts, entertainment, a job, promises, etc.

- **Embezzlement, Theft and Fraud**

These offences involve theft or misappropriation of resources by persons entrusted with authority and control over government property. These can include public officials and private individuals. For example, government workers in charge of distributing food to the Internally Displaced Persons (IDP)   steal portions of the food and sell it to other parties. Medical supplies being transported from the airport to a local hospital may be stolen and sold to a local pharmacy instead. It can also be outright employee theft of cash.

- **Extortion**

The act of extortion involves coercing a person to pay money or to provide other valuables or personal favours in exchange for acting or failing to act. Coercion can be under the threat of physical harm, violence or restraint. For example, a sick woman needs to see a doctor and at the hospital, the nurse tells her husband that he must pay something extra just to get into the doctor's office.

- **Exploiting a Conflict of Interest/Influence Peddling, Insider Trading**

Engaging in transactions, "selling" influence, or acquiring a position or commercial interest that is incompatible with one's official role and duties for the purpose of illegal enrichment. For example, with the intent to profit from secret information, a public official buys land in the area where a large development project is planned to be sited. This official votes in favour of granting permission to the real estate developer to build its project. Regardless of whether or not this project is in the best interest of the public, this official has exploited a conflict of interest for personal enrichment. Privatization of government property, functions and businesses provides abundant opportunities for corrupt exploitation; as witnessed in Nigeria many years ago.

- **Offering or receiving of an unlawful gratuity, favour or illegal commission**

This offence is aimed at public officials who receive anything of value as extra compensation for the performance of official duties. For example, after the issuing of a passport or other document

the recipient gives a "tip" or "gratuity money" for the service received. The officer will be disappointed if in the end he does not get a tip for his assistance.

- **Favouritism, Nepotism and Clientelism**

This is the assignment of appointments, services or resources according to family ties, party affiliation, tribe, religion, sect and other preferential groupings. For example, a public servant may provide extraordinary contract, services, commissions, jobs and favours to political allies, family and friends while members of the general public would not receive this special treatment.

- **Illegal Political Contributions**

This occurs when political parties or the government in power receives money in exchange for non-interference and good-will towards the entity or group making the contribution. It is closely related to bribery. Powerful interest groups, particularly corporations make generous contributions to political parties in order to achieve less regulation of their industry or for specific favours. Politicians may extend courtesies and protection towards to legitimate or even illegitimate enterprises in exchange for contributions to a political campaign.

- **Money Laundering**

Money laundering as such produces a corruptive effect on national and international financial systems. Due to the close link between corruption and money laundering, various international fora have noted that a comprehensive anti-corruption strategy must also include actions to prevent and control the laundering of corruption proceeds. The corruptive effect of money laundering is not only affecting private enterprises and its employees but also the entire states.

Other type of corruption not listed here includes:

- **Bureaucratic Corruption**

This has to do with the pervasive betrayal of trust on the part of public officers who routinely engage in self-enrichment because of the positions they occupy in Ministries, Departments and Agencies (MDAs).

- **Political Corruption**

This type of corruption is perpetrated by politicians: lawmakers, governors and political appointees in the course of their duties as legislators, state chief executives, government advisers and party executives.

- **Systemic Corruption**

This is a situation where corruption is widespread and, more or less, institutionalized and allowed to fester, with little or nothing done to check it.

Further reading on types of corruption:
- UNODC (2001). United Nations Manual on Anti-Corruption Policy. Vienna: United Nations. Retrievable online at http://*www.unodc.org/pdf/crime/gpacpublications/manual.pdf*
- United Nations Office on Drugs and Crime. United Nations Convention Against Corruption. Vienna, Austria: , 2004. Web.http://www.unodc.org/documents/treaties/UNCAC/Publications/Convention/0850 026_E.pdf.

Igbo (2015) has argued that in Nigeria today, success is measured in terms of money and material wealth, with little or no regard for the approved means of acquiring them. As a result there is, more or less, free scramble to acquire money and material possessions. Many people who have the opportunity of working in government, or serving the public, tend to use such opportunities to loot the resources of the state through fraud, embezzlement, outright stealing, abuse of office and all manner of economic and financial crimes. More specifically, Igbo (2015) outlined different forms of corruption which present semantic problems because they are not easily classified as corruption because of their various definitions and interpretations. They include:

- **Fuel subsidy-** The financial support given by the federal government to offset the running cost of refined petroleum products imported into the country by oil marketers. Many of the marketers were alleged to have made fraudulent claims and were paid, with the connivance of government officials. Some did not even import petroleum, yet paid ridiculous amounts from tax payers' money.
- **Ghost workers and pensioners' scam –** Pay rolling non-existent or dead workers as part of the workforce in ministries, departments and agencies (MDAs) has become widespread in Nigeria.
- **Undervaluation –** The deliberate and conspiratorial under-pricing of goods and property because of private pecuniary interests is another source of corruption.
- **Overvaluation –** The deliberate and conspiratorial over-pricing of goods, property, contracts and services by officials on behalf of their management or department for personal gain, is a source of personal enrichment by public officers.
- **Settlement sorting –** Ordinarily settlement has to do with clearing or paying off a bill. In the context of corruption, it means paying an illegal fine to enforcement officers for wrongdoing or infraction of the law. Sorting is similar to settlement. It is used mostly with reference to tertiary institutions whereby students pay or contribute money the lecturer for higher grades. It can also take the form of gifts or sexual favours from female students.

The list on types of corruption is not exhausted. One needs to observe carefully to see the various types as they out in various forms and disguises in Nigeria.

1.1.4   Causes of corruption

It is absolutely important for participants and other stakeholders to examine the causes of corruption so as to be in a better and more informed position to wage the anti-corruption war. Corruption is said to be much more pervasive in developing countries than the more advanced industrial countries of the West (Riley, cited in Otu, 2012:151). Understanding the causes of corruption will play a critical role in preventing it.

- **Organizational Culture:** According to Graff (2007), corruption can be caused by the culture of an organization or group. Corruption in some organizations is in group behavior rooted in established arrangements. For instance, a newly posted officer with no record of corruption might be socialized into the act by other colleagues. The person might be led to conclude that that is the appropriate way things are done.
- **Clashing moral values:** Some have explained the cause of corruption as the clash in moral values. Graff (2007) was among those who argued that corruption is caused by certain values and norms of society that directly influence the values and norms of individuals. These values and norms influence the behavior of individual officials, making them

corrupt. In our society, giving of gifts is highly valued. Gifts often referred to as *kola* paves way for corrupt practices. It is not uncommon to run into public servants asking for *kola* either for services rendered or about to be rendered. This act should be discouraged among public servants because it could make them abuse their entrusted positions. Also, people totally think it is fine to help a friend or relation get a job or contract due to our communal way of life. With these, it is quite difficult to make people understand that such acts could pave way for corrupt practices. i.e., giving a job to a relation who is not qualified at the expense of those that are qualified is nepotism and therefore corruption.

- **Opportunistic:** One cannot rule out opportunity as one of the major causes of corruption. When a public official is made the centre or given the authority to perform some sensitive roles, the person can use it for personal enrichment. To be able to embezzle or award contracts at will, one must be in position of authority or corridor of power which grants one the opportunity to use the position for personal aggrandizement.

1.1.5 Consequences of corruption

According to Otu (2012:153), some scholars and researchers have advanced the view that corruption has both positive and negative consequences. The positive consequences include political development or modernization (Pye, 1967) and economic advancement and integration (Nye, 1967). Ironically, these are more or less the same areas where it is said to have negative consequences. The positive consequences may be for a few people and limited impact on the economy but the negative consequences profoundly undermine the economy and wellbeing of the people.

Corruption has serious negative consequences at the international, national and individual level, even though some people may have had the temerity to ask, in the course of arguments, whether the money or resources misappropriated belongs to one's father as in: "Is the money or resources your father's?" The Lima Declaration, as cited by Igbuzor (2008), states that corruption:
(1) Erodes the moral fabric of society
(2) Violates the social and economic rights of the poor and vulnerable
(3) Undermines democracy,
(4) Subverts the rule of law
(5) Retards development, and
(6) Denies the benefits of free and open competition.

In addition, the Independent Commission against Corruption (ICAC) of Australia, noted that "globally, the World Economic Forum has estimated that the cost of corruption is about US$2.6 trillion a year. The impacts of corruption disproportionately affect the most vulnerable people in society. Widespread corruption deters investment, weakens economic growth and undermines the rule of law" (https://www.icac.nsw.gov.au/about-corruption/why-expose-corruption).

Marsha (2011:73) summarized the consequences of corruption thus:
1. Low foreign investment;
2. Reduced economic growth;
3. Shift from productive to less productive activities;
4. Greater inequality and high incidence of poverty;
5. Reduced efficiency of foreign aid; and
6. Currency crises.

At the national level, a close look at the above consequences reveals that Nigeria is currently bedeviled by these problems to a large extent. This is because the country has suffered, and continues to suffer, from massive looting of the economy by public officials in collaboration with private interests. Other consequences of corruption include:

1. Unemployment and underemployment
2. Infrastructural decay
3. Poor quality and delivery of public projects
4. Poor public services
5. Production and sale of substandard goods
6. Incompetent political leadership.
7. Image/Reputation Bashing

The greatest consequence of corruption is perhaps the ones felt by the individual and more specifically, the poor members of the society. This is because the poor are wholly dependent for government for housing, health care, security, welfare, education, etc. When these things are not provided or insufficient, they are the most affected. Some of the consequences of corruption to the individual are:

1. Infant mortality due to lack of basic vaccines
2. Illiteracy
3. Lack of access to health care
4. Accidents due to bad roads, bad drainage systems, etc.
5. Unemployment
6. Low life expectancy
7. Homelessness
8. Poverty
9. Diseases
10. Hopelessness

Death of individuals like pensioners, etc.

Chapter　　1.2.0.　Corruption perception

Learning Objectives

After this module, participants are expected to

- Explain the general and individual perception towards corruption in Nigeria
- Describe the various factors that influence these perceptions
- Identify the various excuses put forward for corrupt practices and devices ways to counter them
- Compare perception among various class and groups in the society

Overview

This module will capture corruption perception both internationally and within. It will consist of four major parts of which introduction is the first. The second part will capture perceptions towards corruption. It would be divided into external and internal perception. The third part is the factors that influence how corruption is perceived. The last part looks at common excuses put forward on corruption. What follows are the expected activities and assessments.

1.2.1.　Introduction

It is now a reality that corruption has become a hydra headed monster that has eaten so deep into the social, political and economic fabric of the Nation. There appears to be a consensus among Nigerians and the international community that the nation is highly bedeviled with corruption. Although some may dissent, the report by EFCC on other financial agencies in the country on fraudulent transfers and other related activities is a call for action on corruption prevention in Nigeria. Understanding how corruption is perceived will go a long way in stimulating attitudinal change towards anti-corruption prevention methods.

Perception is the conscious understanding of something. Perception towards corruption may involve the understanding and the extent to which corruption is comprehended in Nigeria. It involves both the opinions and views of people, group and organization on their understanding and comprehension of corruption in Nigeria.

1.2.2.　Corruption Perception

Corruption perception may be viewed in two different ways: External perception which involves international outlook towards corruption in Nigeria. The second is internal and it involves individuals/citizens perception which is how Nigerian citizens understand or comprehend corruption.

- **External perception**

From the general, we shall focus on the image of Nigeria in the international community. The Transparency International (TI) Corruption Perception Index (CPI) which started since 1996 to publish annual ranking of countries by their perceived levels of corruption as determined by expert assessments and opinion surveys is a good way to start. It aggregates data from a number of different sources that provide perceptions of business people and country experts of the level of corruption in the public sector.

Obviously, no country gets close to a perfect score but some seem to have the habit of being found among the lower-ranked. These countries are plagued by untrustworthy and badly functioning public institutions like the police and the judiciary; consequently, there are frequent cases of bribery and extortion, misappropriation of funds, and official indifference in combating corruption (Transparency International, 2017). Among the 176 countries surveyed in 2016 in the CPI, Nigeria ranks 136. Corruption rank in Nigeria was noted to average 119.14 from 1996 until 2016. It recorded its highest of 152 in 2005 and lowest in 1997 with just 52.

NIGERIA CORRUPTION INDEX

SOURCE: TRADINGECONOMICS.COM | TRANSPARENCY INTERNATIONAL
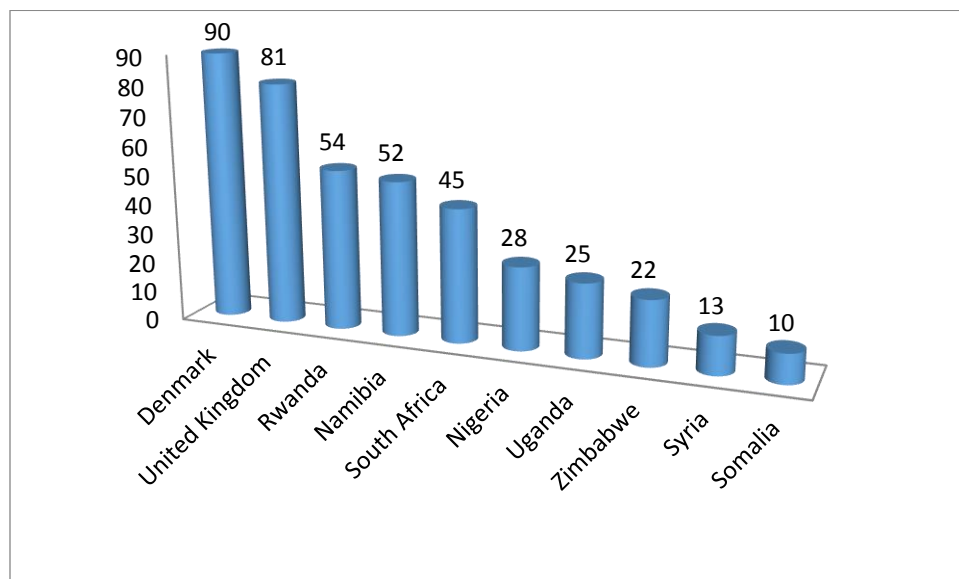
Figure 2: some selected countries and their CPI score. (TI, 2016).

Though Nigeria is not the country with the lowest score, in 2016 her score was 28%. According to CPI, any country that scores below 50% is considered highly corrupt. A country or territory's score indicates the perceived level of public sector corruption on a scale of 0 (highly corrupt) to 100 (very clean). In other words, a country that scores nearer to 100 is doing very well in the fight against corruption while a country that scores 50 and below is considered to be doing very badly.

The Limits of CPI
There are various reasons given as to why CPI should not be taken seriously; chief of which is its methodology. CPI basically is a poll of various polls of composite index that combines data from a range of surveys and other assessments of corruption. In other words, the data is not collected by TI themselves but rather by different organizationorganizations. This is brought together by TI to create one score for each territory. Also, TI does not actually measure corruption but perception of it. This can be misleading sometimes. Since, phenomenon perceived in certain ways may differ from reality. Lastly, it does not look at corruption from the private sectors but governments alone.

Participants should be made to know that these reports have wide ranging implication for Nigeria in the social, political and economic sphere. This is in spite of the many issues, such as the criticisms, surrounding the report; it is still used for risk assessment by organizations seeking to invest or by donor agencies seeking to give aid.

- **Internal perception**
Participants will learn that measuring internal perception of corruption in a country like Nigeria is not as feasible and attainable as that of the external which involves mostly organization working beyond the reach of government. That being said, perception does not necessarily measure reality, as earlier noted, neither does it measure impact which is why the National Bureau of Statistics (NBS) collaborated with United Nations Office on Drugs and Crime and European Union to gather data on the different forms of ways that corruption affects lives. No government, regardless of how poor it is performing, would like to shed her administration in bad light. Nonetheless, the laymen on the street might not hesitate to indicate that there is corruption everywhere. Similarly, many office holders have often highlighted corruption as the major reason for poor performance of government and other institutions in the state. For instance, Nasir, El-Rufai in his book "The Accidental Public Servant" cited many cases of corruption at the nation's helm of affair.

Most disturbingly, indulging in corrupt practices is gradually becoming part of many citizens that it could be taken to be conventional. In fact, corruption in Nigeria has gotten to the extent that one could be tempted to say that it is socially desirable and acceptable. For instance, most passengers would frown at a driver who chose to be delayed by a policeman rather than bribe one's way through. In like manner, people want things done faster than it should not minding to cut corners, get special consideration, etc. these obviously leads to various corrupt practices. Participants must be reminded that both the givers, takers and those who encourage bribery as well as other types of corruption are all guilty of the act. In addition, participants should note in this section that there is a dire need to change these negative perceptions which in fact forms the nucleus of this section.

1.2.3. Factors that Influence how Corruption is Perceived

There are many factors that help in explaining corruption perception both within and outside. Although CPI makes use of surveys/assessments from people or performance assessments from a group of analysts at the individual level, some actions that lead to a country being perceived as corrupt are explained below.

- **Weak Judiciary**

How a country is able to handle suspects and those accused has varying implications. If they are allowed to walk freely without being prosecuted, it could send the wrong message or even encourage others to engage in the act. In Nigeria, there are many cases of corruption either reported, under investigation or being prosecuted. Sadly, there are however very few conviction. This low rate of conviction breeds distrust and negative perception not just to the judiciary but to the nation at large.

- **A paradox**

It is not news that even though Nigeria is blessed with abundant natural resources many of her citizens still continues to live in abject poverty. United Nations reported that about 64% of her population lives below the poverty line. The reason for this according to Omotola (2008) is that these resources are obviously untapped and mismanaged from the first four decades of her independence. The implication of this is that people are prepared to cut corners in a nation of plenty that they only have little to survive with.

- **Poor accountability**

When a public servant is not accountable it breeds room for suspicion. As we have come to note, past leaders and political office holders that are accused of embezzlement, bribery, extortion, etc. are hardly made to be accountable during and after their period in office. This is wrong! Moreover, it sends the wrong message.

1.2.4 Common Excuses for Corruption

Many caught in the act of corruption have provided often incoherent and flimsy excuse as to why they engaged in the act. Participants should be made to know that hiding behind these excuses does not in any way make one unaccountable for their actions. Some of these excuses will be looked at.

- **I didn't know it was corruption**

Even though not all corruption related activities are easily recognizable like the more obvious types like bribery. Today, corruption could be more imperceptible thereby leaving the perpetrators with excuses like "we don't know it is a corrupt practice." For example, people sometimes give gifts to public officials, which is not wrong in itself, rather it becomes questionable when it is given with an intent to influence their decision in any way. Participants should be made to know that ignorance of the law is not an excuse. Similarly, intended corruption is also punishable. That is intending to engage in the act is as wrong as actually engaging in it.

- **Government's property is nobody's property**

Many often consider government property as nobody's property. They sound this as if it gives them the moral justification to loot, embezzle, and extort at will. This ideology must be changed as citizens must start seeing government's property as everybody's property and not what should be used at will.

- **It is everywhere**

  No doubt corruption is everywhere. It exists in societies at both national and international levels (Mashal, 2011). This however is never a green light to indulge in corrupt practices. Many have often argued that since others are doing it that they have the right to do it as well. That corruption is everywhere is never an excuse because if caught one would still be made to suffer the full wrath of the law. As the saying goes, "two wrongs do not make a right."

- **Blame it on poverty and economic hardship**

 People often cite hardship, difficulty, unemployment, etc. as the excuse for engaging in corrupt practices. Much does not need to be said in this part because nations have witnessed honest and hardworking individuals who have wriggled out of poverty and hardship by engaging in meaningful jobs. Again, this is no excuse!

- **It is the Devil**

It has become so popular that when one is caught in a corrupt act, the common excuses given are: 'it is the devil that caused it' or 'the devil pushed me to do it'. This is also a trend for other crimes as well, citing the devil as an excuse for participating in the act. Someone has to be held accountable for a corrupt act and for that the excuse of "the devil" is generally not accepted. People are expected to be solely responsible for their actions and so suffer the penalty when they default.

Activity
1. Ask participants to divide themselves into groups and brainstorm on the socio, political and economic implications of transparency international corruption index on Nigeria
2. Analyze the various laws on corruptions in these instruments: UNCAC, ICPC, and ECOWAS
3. In plenary, take up suggestions on how to change these perceptions both internationally and nationally.
4. In Plenary, ask the participants to relay experiences of excuses put forward by people indulging in corrupt practices.
5. Participants should suggest other indicators that can be used to ascertain corruption perception.
6. Participants should ascertain whether their suggested indicators would vary from one community to the other, within Nigeria.
7. Participants will be invited to discuss other causes of corruption which have been identified by Mauro (1996 as cited by Mashal (2011:73). These include
- Poverty, low salaries and wages and high risks such as illness, accidents and unemployment.
- Weak legislative and judicial systems.
- Law and ethics
- High level of population growth
- Political instability and weak political will.

Assessment
> ➢ Participants are expected to do a brief study through observation on types of corruption observed in any of these areas and present the results in plenary.
>   o School
>   o Family
>   o Peers
>   o Church

Chapter   **1.3.0. Understanding the Legal and Institutional Framework Surrounding Corruption Prevention and Its Application**
1.3.1. Introduction
1.3.2. Corruption in Nigeria and some instances
1.3.3. International Anti-Corruption Legal and institutional frameworks
1.3.4.   Nigerian Anti-Corruption Legal and institutional frameworks

Learning Objectives
At the end of the modules, participants would be able to
- list International and national laws of anti-corruption
- Identify the various institution responsible for anti-corruption
- Explore these legal frameworks on their jurisdiction
- Note the general and limited nature of the legal frameworks

Overview
There are institutions and laws erected both at the national and international level to help combat corruption. Some of these laws and institutions will be explored in this section. The section will start with a brief introduction and then proceed to the second part which is focused on corruption in Nigeria. The third part will be dedicated in exploring the various international anti-corruption legal and institutional framework while the fourth section will look at Nigerian anti-corruption legal and institutional framework.

1.3.1. Introduction
Participants will explore the meaning of good governance and how decisions can be made and implemented in a way to ensure the maintenance of a system free from corruption and mismanagement. Participants will learn that 'good governance' refers to the management of government in such a way that it is free from abuse and corruption and there exists due regard for the rule of law. It can be characterized as a system that includes participation, transparency, and accountability, rule of law, effectiveness and equity
- Legal framework for corruption prevention (International conventions, National laws and policies
- Tools for corruption prevention (Standards, Ethics, Controls, Whistleblowers, etc.)
- Public procurement and management of public funds

1.3.2. Corruption in Nigeria

Corruption is a cankerworm that has eaten deep into the moral fabric of the Nigerian society. It is one of the problems militating against socio-economic development in Nigeria. In the past, it was more or less a taboo to cheat or engage in fraudulent activities because of the traditional values of honesty and hard work. Presently, as value system changes, there seems to be a more demand for materials things and material possessions.

Over three decades ago, Achebe (1983) had declared that corruption has not "alarming proportions" entered "the final stage" and that Nigeria would die if people continued to pretend that she was only slightly indisposed. One can say that what Achebe saw then was only a 'tip of the iceberg'. Transparency International (TI) has over many years, rated Nigeria as one of the most corrupt countries in the world. Funds meant for development and poverty reduction have been routinely siphoned into individual bank accounts in foreign countries. These funds are consequently used to support foreign economies to the neglect of the Nigerian economy (Osuji, 2005).

Many years ago, most Nigerians thought that corruption was the exclusive presence of the Nigeria police. Today, Nigerians have come to the bitter truth that police corruption, though pervasive and widespread, is not the real problem. The real problems appear to be political corruption or corruption by politically exposed persons (PEPs) and bureaucratic corruption which occur in government offices and department. Most adult Nigerians are probably aware of what has become known as "Dasukigate", the corruption scandal of $2.1 billion involving the former National Security Adviser, Col. Sambo Dasuki (retd). The amount, which was meant for arms procurement for the military, was shared to several political associates towards the 2015 general elections. Many former governors, ministers, heads of government agencies and parastatals and other public officers have been alleged to have corruptly enriched themselves by billions and hundreds of millions naira. More instances of corruption cases in Nigeria include but are not limited to:

- EFCC revealed that about $38m, N23m and £27,000 cash was uncovered in an apartment in Ikoyi during a sting operation by its operatives from the Lagos Zone. *Read more at: http://www.vanguardngr.com/2017/04/efcc-uncovered-another-38m-n23m-27000-ikoyi/*
- Economic and Financial Crimes Commission, uncovered another N250 million from the popular Balogun Market still in Lagos.
  Read more at: http://www.vanguardngr.com/2017/04/breaking-efcc-uncovers-another-n250m-cash-haul-balogun-market/
- Former military ruler, Gen. Sani Abacha was reported to have stolen about $2.2bn that he had reportedly stashed in European bank accounts. *Read more at: http://www.bbc.com/news/world-africa-31933083*
- The Economic and Financial Crimes Commission (EFCC) uncovered how $32.5 million of about $200 million fines from Halliburton Energy Services was allegedly paid into a private account. The cash was said to be missing because the anti-graft agency could not ascertain whether or not it was remitted into the Federal Government's account. *Read more at: http://saharareporters.com/2016/09/01/halliburton-scandal-efcc-traces-n135b-private-account*

1.3.3. International Anti-Corruption Legal and Institutional Frameworks

Following a number of corruption scandals involving Western-owned multinationals abroad in the 1970s, pioneering efforts to address corruption were taken by the United States and focused solely upon the behavior of Western companies. The US was the first nation to criminalize the extraterritorial payment of bribes by domestic companies in the form of the US Foreign Corrupt Practices act (FCPA) of 1977. These efforts were aimed at criminalizing the bribery of foreign officials by US companies.

In the post-Cold War period there was also an increasing international consensus that the corrupt practices of multinational companies and other actors had negative effects on developing countries. These negative effects included:
- Undermining economic prospects, fostering inequality and exacerbating poverty;
- Creating disadvantages for foreign domestic firms;
- Creating greater inequality between poor and rich countries by transferring money that could be used for poverty eradication into the hand of the rich;
- Damaging the environment;
- Undermining democratic institutions; and
- Fostering organized crime (illicit trafficking of drugs, arms, human beings, etc.).

Following this international consensus and the benchmark established by the FCPA, attempts were made to level the playing field. US-based multinational companies had come to feel disadvantaged in the global market place, since non-US multinationals were not subject to the same stringent prohibitions on bribery. Thus in 1997, OECD member countries decided to curb bribe-giving in international business with the creation and ratification of the 1997 OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions.

At the same time, attempts were made to step up the fight against international organized crime and corruption, which had become an increasing global threat to the security, governance and economy of all states, by improving international police and judicial cooperation through the adoption of international conventions aiming towards legal harmonization and establishing more efficient cooperation mechanisms.

In this new context, a number of multilateral conventions have been negotiated, adopted and ratified. They represent binding agreements at the sub-regional, regional or global levels. While all of these conventions are important and useful, the following list will limit itself to the most significant conventions, namely (in chronological order):
- The Inter-American Convention against Corruption (adopted in 1996);
- The 1st Protocol (adopted in 1996) to the 1995 EU Convention on the Protection of the Financial Interests of the European Communities, followed by the EU Convention on Anti-Corruption (adopted in 1997);
- The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (adopted in 1997);
- The Council of Europe Criminal Law Convention on Corruption (adopted in 1998);
- The Council of Europe Civil Law Convention on Corruption (adopted in 1999);
- The African Union Convention on Preventing and Combating Corruption, AUCAC (adopted in 2003); and

- The United Nations Convention against Corruption, UNCAC (adopted in 2003).

The first summit of the Americas and the Organization of American States (OAS) undertook and adopted the Inter-American Convention against Corruption in 1996. This Convention represents the first regional judicial instrument dedicated to fighting corruption. The Convention aims to promote the development of the necessary mechanisms to 'prevent, detect, prosecute, and eradicate corruption', as well as to 'promote, facilitate, and regulate cooperation between States Parties on these matters'.

1.3.3.1 The United Nations Convention against Corruption, UNCAC

According to the preamble, UNAC is *Concerned* about the seriousness of problems and threats posed by corruption to the stability and security of societies, undermining the institutions and values of democracy, ethical values and justice and jeopardizing sustainable development and the rule of law…,

UNAC developed a statement of purpose in Article 1 which are:
(a) To promote and strengthen measures to prevent and combat corruption more efficiently and effectively;
(b) To promote, facilitate and support international cooperation and technical assistance in the prevention of and fight against corruption, including in asset recovery;
(c) To promote integrity, accountability and proper management of public affairs and public property.

Chapter II of the UNCAC (i.e. from Articles 5-14 make provisions for measures a State can take to prevent corruption. These measures include:
- Framework for appointing and promoting civil servants on merit [Article 7(1) and (2) UNCAC]
- Transparency in the funding of political office candidates [Article7(3) UNCAC]
- Law promoting transparency [Article 7(4) UNCAC]
- Code of Conduct for public officers [Article 8(1) & (2) UNCAC]
- Reporting mechanism for violations of code of conduct [Article 8(4) UNCAC]
- Disciplinary mechanism for violation of code of conduct [Article 8(4) UNCAC]
- Public Procurement [Article 9(1) UNCAC]
- Fiscal transparency and responsibility [Article 9(2) UNCAC]
- Access to Public Information [Article 10 UNCAC]
- Independent judiciary [Article 11(1) UNCAC]
- Independent prosecutor [Article 11(2) UNCAC]
- Measures to curb corruption in the private sphere [Article 12 UNCAC]
- Participation of Civil Society through access to information and freedom of disseminating information [Article 13 UNCAC]
- Anti-money Laundry legislation [Article 14 UNCAC]

The UNCAC also provides measures of deterrence in Chapter III and IV which is geared towards minimizing the advent of corruption, though they are of enforcement in character. These provisions are worthy of mention because, the act of prevention and enforcement are interwoven. A sound and efficient system of enforcement sets a strong foundation for prevention to thrive on. In this case, enforcement on its own becomes a measure of prevention.

Chapter III provides for the criminalization of corrupt offences under the following types –
- Criminalization of Specific Offences
    - Bribery of Public Official
    - Embezzlement
    - Abuse of Functions
    - Illicit Enrichment
    - Bribery / Embezzlement in the Private Sector, and
- General Provisions relating to all Offences:
    - Statute of Limitations
    - Jurisdiction
    - Liability of Legal Persons
    - Prosecution

Chapter IV enumerates measures that further strengthen Chapter III providing for measures of collaboration between States to ensure prosecution, where corruption and/or its perpetrators cross territory. Hence, its provides for –
- Extradition
    - Addresses the issue of 'double criminality'.
    - If State does not extradite its nationals it <u>must</u> seek to prosecute / enforce a sentence that has already been applied.
    - Encouragement of cooperation and the agreement of bilateral treaties
- Mutual Legal Assistance
    - MLA to be provided in relation to investigations, prosecutions and judicial proceedings
    - Requirement for States to designate an MLA authority
    - Outlines a template for an MLA request

Chapter V provides for principles for States to collaborate to recover proceeds of corruption that might have cross territory or territories. It provides thus:
Return of Assets a fundamental principle of the Convention (Article 51).
Prevention / Detection of transfers of proceeds of crime
Requirements on Financial Institutions to identify customers
Enhanced scrutiny of accounts of public officials
Prevent banks with no physical presence
Recovery of Property through Int. Cooperation
Give effect to confiscation orders from another SP including freezing orders
Assets to be returned to requesting State Parties

1.3.4. Nigerian Anti-Corruption Legal and institution framework

1.3.4.1 Legal History of Anti-corruption laws

The history of anti-corruption legislation in Nigeria can be traced back to the colonial era, particularly to the enactment of the Criminal Code Ordinance of 1916, which subsequently became an Act of parliament at independence in 1960. Thereafter several pieces of legislation have been

enacted which have either been directly or indirectly targeted at the issue of corruption. Since 1999 however, there has been a flurry of legislative activity concerning the issue of corruption, which phenomenon has grown significantly and has been tied to the countries developmental challenges. It is therefore important to engage in a review of the extant anti-corruption legislations with a view to ascertaining Nigeria's anti-corruption legal framework.

A lot of strategies have been employed in the past to curb corruption in Nigeria. However, the institutional model have been the more consistent in Nigeria's approach to tackling the issue of corruption. Hence, the legal framework has over the years reflected the above position. A general list to depict this history to today can be represented but not limited to as follows:

Customary Law
Public Bodies Corrupt Practice Act, 1889
Criminal Code Ordinance 1904 (Northern Nigeria)
Prevention of Corruption Act, 1906 (Received English Law)
Criminal Code Ordinance, 1916 (Received English Law)
Penal Code, 1960
Criminal Justice (Miscellaneous Provisions) Decree 1966
Corrupt Practice Decree, 1975
Constitution of the Federal Republic of Nigeria, 1979
Bank Employees (Assets Declaration) Act, 1986
Code of Conduct Bureau & Tribunal Act, 1989
Money Laundering Act, 1995, 2011, 2012
Constitution of the Federal Republic of Nigeria, 1999 (As Amended)
Independent Corrupt Practices and Other Related Offences Act, 2000
Economic and Financial Crimes Commission Act, 2004
Federal High Court Practice Direction, 2013
Federal High Court Sentencing Guidelines, 2016.

The institutional model started in 1977 by the Jaji declaration by President Olusegun Obasanjo; the Ethical Revolution of Shagari in 1981; War Against Indiscipline by Buhari in 1984; National Orientation Movement by Babangida in 1986; Mass Mobilization for Social Justice by Babangida in 1987; War Against Indiscipline and Corruption in 1996 by Abacha to the Independent Corrupt Practices (and Other Related Offences) Commission by Obasanjo in 2000 and the Economic and Financial Crime Commission 2002 by Obasanjo. The institutional strategic model for anti-corruption is therefore fathomed on the wisdom that anticorruption institutions/agencies were established in Nigeria to administer the following policy prescriptions 'deterrence, prevention, and public sector reforms'. They are:

a. To establish and maintain a high standard of public morality in the conduct of Government Business and to ensure that the actions and behaviors of the Public Officers conforms to the highest standard of public morality and accountability. The Code of Conduct Bureau and Code of Conduct Tribunal was established.

b. To address public sector corruption, through education and prevention by examining, reviewing and enforcing correction of corruption-prone system and procedures of public bodies, with a view of eliminating or minimizing corruption in public life.

c. To ensure that government contracts are awarded in accordance with the best practices and universal standards for tendering and procurement of contracts around the world. The Due Process Office was established in 2003 under the Office of the President.

d. The Economic and Financial Crime Commission (EFCC) was a major departure from the past enabling laws for fighting corruption or economic and financial crimes in Nigeria, in terms of powers, functions and responsibilities. It was borne out of international pressure as a precondition for the removal of Nigeria from the list of Non-Cooperative Countries and Territories (NCCTs) of the Financial Action Task Force (FATF) on Money Laundering.

1.3.4.2 Hierarchy of Corruption Laws
- Constitution
- Federal Statutes (Include International, Multilateral and Bilateral Agreements ratified by Nigeria)
- State/Regional Statutes
- Bye Laws (LGA)
- Subsidiary Legislation/ Rules of Court
- Judgements (Superior Courts of Record)
- Customary Laws/Sharia

Among the various laws mentioned, participants will be formerly introduced to the major function of some of the laws. Some of them have provisions aim at deterrence; some others at checking and preventing the advent of corrupt acts, which is the focus of this manual. This brief review of the provisions of the laws will be done in their hierarchy.

Constitution
- The 1999 Constitution of the Federal Republic of Nigeria (As amended) is the most potent or lethal of all frameworks on anti-corruption in Nigeria (See the case of AG Ogun vs AG Federation & Ors (2002) 9 NWLR (Pt. 772) 222; (2002) 6 SC 1). Chapter II of the 1999 Constitution (As amended) additionally sets the tone for legislation targeted at checking corruption in the political, economic, social, educational and foreign relations sectors (See Sections 15 – 24 of the 1999 Constitution (As amended)). This provision of Chapter II is however handicapped on its own, because it is non-justiciable. Other valuable provisions abound, like the provision of a Code of Conduct Bureau as well as Tribunal to check corruption tendencies in the civil service and public service (See Sections 153, 15 – 18 in Part I of the Fifth Schedule of the 1999 Constitution (As amended)). Furthermore, Sections 169, 170 and 206, 207 establishes the civil service structure and a commission for the federation and states respectively. They are to handle appointment, promotion, discipline and removal of civil servants in accordance with the framework set up under the Constitution. There is provisions regulating conducts of the judiciary and establishing the National Judicial Council to administer it (See Sections 292 and 153 of the 1999 Constitution (As amended)). It also provides for a ten years disqualification from contesting in elections on persons convicted for crimes touching on dishonesty and fraud (See Sections 137(1)(e), 182(1)(e) and 66(1)(d) of the 1999 Constitution (As amended)).

Federal Statutes (Include International, Multilateral and Bilateral Agreements ratified by Nigeria)
- The Corrupt Practices and Other Related Offences Act 2000, establishes the Independent Corrupt Practices and other related Offences Commission which ensures compliance with due process of law in all public institutions, between private individuals transaction and prosecute persons or entities in breach.

- The Economic and Financial Crimes Commission [Establishment] Act 2004, establishes the Economic and Financial Crimes Commission who serve as a watch dog for all economic and financial transactions in the public as well as private sectors of the economy.
- Code of Conduct Bureau and Tribunal Act 1975, sets up the Code of Conduct Bureau and Tribunal respectively. It ensures civil and public servants comply with due process in the execution of their duties and meets out sanctions to defaulters after due prosecution.
- Bureau of Public Procurement Act 2007 establishes the Bureau of Public Procurement and provides for a concise and open procedure for procurement of public assets to eliminate a breeding room for abuse.
- Public Complaints Commission Act 1975, establishes the Public Complaints Commission (popularly called the Ombudsman) to handle complaints arising from the indiscretions of civil servants which had affected a complainant.
- Nigerian Extractive Industries Transparency Initiative Act 2007, enacted to promote transparency in the extractive sector in through the publication of the sector's activities, progress, contracts, bidding etc considering how important and pivotal this sector is within the Nigerian economy.
- The Freedom of Information Act, 2011, enacted to promote transparency in the public sector through access to government records and build an independent press plus, a viable civil society system (See the decision of the Court in Media Rights Agenda & Ors. v. Code of Conduct Bureau & Ors [unreported] decided by Justice Gbolahan Jinadu of the Federal High Court on the 2nd May 2001). The Act also establishes the right of every individual to any information in the custody of a public officer with the exception of some restricted information relating to security issues and private information.
- The Fiscal Responsibility Act 2007 established the Fiscal Responsibility Commission to monitor compliance with the provisions of the Act with respect to the management of the nation's resources in a transparent and responsible manner.
- The Bank Employees (Declaration of Assets) Act 1986, was enacted to specifically control corruption in the banking industry by way of mandatory annual asset declarations by bank employees. But the Act also provides an opportunity for a broader application to the private sphere through and executive proclamation by the President of the Republic extending the requirement of mandatory annual asset declarations to other persons or professions.
- The Money Laundering (Prohibition) Act, 2011 (As amended) is the principal legislation specifically dedicated to the control of money laundering in Nigeria. The responsibility of enforcing the Money Laundering Act is vested in the Economic and Financial Crimes Commission.
- There is also the Extradition Treaty between the Government of the Federal Republic of Nigeria and the government of the Federal Republic of South Africa (Ratification and Enforcement) Act, 2005. This Act will aid the extradite person(s) who having committed corrupt acts run to South Africa as a safe haven, back to Nigeria, so such person(s) can be lawfully prosecuted and proceeds recovered legally.

Subsidiary Legislations

At the bottom of the hierarchy pyramid is subsidiary legislations. Made pursuant to already existing laws, subject or limited to its parent law where inconsistent but as potent as its parent law where consistent.

- In 2005, the President of the Republic, by executive order, established the Special Control Unit against Money Laundering (SCUML) as a special unit to fight Money Laundering and

domiciled it in the Federal Ministry of Trade and Investment. SCUML has the mandate to monitor, supervise and regulate the activities of all Designated Non-Financial Institutions (DNFIs) in Nigeria in consonance with the Country's Anti Money Laundering and Combating of the Financing of Terrorism (AML/CFT) legal regime.

- The Public Service Rules 2008, is another subsidiary legislation meant to tackle corruption. Regulation 010103 of the Public Service Rules 2008 provides for the suspension of an indicted public officer pending the determination of criminal proceedings pending against such a person. Regulation 030402 of the Rules classifies as serious misconduct, the following acts: bribery, corruption, embezzlement and misappropriation, while Regulations 030404 and 030406 provide for the interdiction or suspension respectively, of an indicted public officer pending completion of disciplinary action. Interdiction here refers to suspension from duties with half pay, while in the case of an outright suspension no pay accrues to the suspended officer.
- The Federal High Practice Direction, 2013 makes provisions for expediting the speed of corruption cases, thereby taking care of the obstacle of delay exploited by person(s) standing trial for corruption offences.

Nigeria has also executed certain International Mutual Assistance Agreements on matters relational or incidental to corruption with the aim of curbing it. Some of these international treaties on mutual legal assistance include: the Economic Community of West African States Convention on Mutual Legal Assistance in Criminal Matters (2002) and the Treaty on Mutual Legal Assistance in Criminal Matters between the Government of the Federal Republic of Nigeria and the government of the Republic of South Africa (Ratification and Enforcement) Act, 2005.

1.3.4.3 Principles of Corruption Prevention Laws

i. Target Hardening

Using the instrumentality of the law to make targets more resistant to attack or more difficult to remove or damage. E.g. using Treasury Single Account with multiple accounting checks which was made by a simple regulation by the Federal Government. Agencies can use rule making where their extent laws allow them to develop this type of policies.

ii. Target Removal

Permanent or temporary removal of vulnerable person(s) or property or process. Quite simply, this means making sure that any object which a potential criminal might be interested in is not visible. Provision of subsidiary legislation or a department code of operation can develop this sort of policies to achieve this principle. Reducing human mediation in potentially risky transactions, e.g. deploying electronic traffic monitoring systems where infractions are detected remotely and fines assessed and administered without physical human contact.

iii. Reducing Means of Committing Corruption

Using the law especially administrative direction to make sure that material capable of being used to help a criminal commit a crime is not accessible." E.g. transiting to a cashless economy, to reduce traceless bribe taking. E.g. removing banking secrecy regulations which aid the laundering of illicit funds.

iv. Reducing Payoffs

Reducing the gain for the criminal if a crime is committed e.g. reduction in fines for traffic offences, thereby encouraging offenders to pay fines rather than bribe low enforcement officers.

v. Access Control

Restricting or increasing access on the number of individuals corruption prone transactions e.g. approvals, licensing to remove monopolies and concentration of discretion. This can be achieved by simple administrative direction or code of operation.

vi. Surveillance

Improving surveillance to obtain information to nib crime in the bud and deter criminals. Including financial intelligence tracking (Suspicious Transaction Reports [STRs], Cash Transaction Reports [CTRs]) and life style checks performed by Asset Declaration Bodies [e.g. CCB] and Tax bodies.

vii. Environmental Change

Relying on the 'broken glass' theory and Bo Rothstein's work on "Social Trust and Corruption", attempt to create an environment of integrity which spurs individuals to act ethically. Setting a system that encourages reward for hard work and recognition for excellence.

viii. Rule Setting

Developing standard operating procedures and regulations that reduce ambiguity and opportunities for arbitrary exercise of discretion. And even where discretions are to be exercised, there should be provided clear guidelines for exercising such discretions with requirement for accountability.

ix. Increase in the chances of being caught

Reducing developing standard operating procedures and regulations that reduce ambiguity and opportunities for arbitrary exercise of discretion impunity in criminal administration of justice, using multiple check systems and improving reporting systems such as whistleblower policies

x. Deflecting Potential Offenders

Monitoring past offenders e.g. under Crime Prevention Act and referring recidivists for rehabilitation training programs

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Activity
- Participants should go through the list of laws under module 1.2.4.1 and place them in the hierarchy of laws listed in module 1.2.4.2
- Participants should make a list of anti-corruption laws made by States or Local Government in Nigeria
- Participants would be shared into different groups and asked to brainstorm on the areas of similarities and differences on these laws provided by the international communities
- Participants are expected to continue in the same group and brainstorm on the areas of similarities and differences on roles of various institutions of anticorruption in Nigeria.

Assessment
- Participants to make a list of corruption prevention laws in Nigeria
- Participants should explain what they understand by hierarchy of anti-corruption laws

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Further reading:
- African Union Convention on Preventing and Combating Corruption
- The United Nations Convention against Corruption
- The Economic and Financial Crimes Commission [Establishment] Act 2004
- The Corrupt Practices and Other Related Offences Act 2000
- Bureau of Public Procurement Act 2007

- Hearther Marquette, et al, (2011) Tools and Methods Series: Supporting Anti-Corruption in Partner Countries; Concept, Tools and Areas for Action.
- Oluwafemi Alexander, LADAPO (2013) A Review of Ant-corruption related legislation in Nigeria
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Module 1.4.0.   Corruption Prevention Plan

1.4.1. Introduction
1.4.2. Why the interest in corruption prevention
1.4.3. Organizational strategies for corruption prevention
1.4.4. Developing a corruption prevention plan
1.4.5. Sustaining a corruption prevention plan

Learning Objectives
At the end of the modules, participants would be able to
- Recognize the importance of corruption prevention
- Identify organizational strategies for dealing with corruption prevention
- Develop a corruption prevention plan
- Apply a corruption prevention plan

Overview
This section is dedicated to capturing the meaning of corruption prevention plan, strategies, how to develop and sustain a corruption prevention plan. The first section will serve as the introduction, followed by the second section which tries to explain why there is interest in corruption prevention plan. This is followed by strategies of corruption prevention plan. Section four will capture what it means to develop prevention plan while the last section will look at how to sustain corruption prevention plan.

1.4.1. Introduction

The first task here is to define prevention. Chambers 21st Century Dictionary defines prevention as "an act or process of preventing" and as "hindrance or obstruction". Simply put, prevention is the act of stopping something from happening or occurring. At this juncture, we may ask the question: How can we stop corruption from taking place? The old adage, in medical parlance, which states that "prevention is better than cure", summarizes this point.
Prevention of corruption is a proactive measure designed to either prevent corruption completely or reduce it substantially. According to Pease (2002:948), "to prevent or reduce something involves securing its non-occurrence". Brantinghain and Faust (1976) as cited in Pease (2002:950), classified crime prevention into:

(1) 'Primary prevention', which reduces crime opportunities;

(2) Secondary prevention, which seeks to change people, particularly the high risk individuals; and

(3) Tertiary prevention which has to do with the truncation of a criminal career, in length, seriousness, or frequency of offending.

1.4.2. Why the interest in corruption and corruption prevention

In recent years, the issue of corruption and the search for strategies to combat its corrosive effects has grown in importance as a topic of public debate and a criterion by which civil society evaluates leadership (Mikali, 2012). In introducing the course to participants, the relevance and reasons for studying corruption will be outlined. This will include career paths in anti-corruption, such as criminal law, academic scholarship, policy development and implementation, training, technical assistance and advocacy. Participants will also learn that it is better to work towards corruption prevention as it helps in arresting the social ills developed by it.

Lack of interest in corruption will result in continued deterring of investments, weakening of economic growth and continued breakdown of the rule of law. According to Independent Commission against Corruption (ICAC) Australia (https://www.icac.nsw.gov.au/about-corruption/why-expose-corruption), if corruption is not paid attention to, it can lead to:

- Loss of trust in government
- Wastage of public resources and money
- Weakening of the judicial system
- Inefficiencies in operations
- Reputational damage which makes it difficult to recruit and retain quality staff or obtain best value in tender processes.
- Difficulty in attracting business investment.

To curb this menace, interest in corruption prevention is pertinent. Here are some of the benefits in showing interest as well as commitment in corruption prevention

- It helps to reveal how best to tackle the menace of corruption
- It helps in boosting trust and integrity in both public and private sectors
- It prepares law enforcement officers, agencies and policy makers to be alert in dealing with corruption
- It helps to establish position of authority when dealing with corruption related cases
- It is a more dedicated effort towards corruption eradication
- It helps in the emergence of scholars in the Corruption Prevention field.
- Showing clear interest in corruption prevention gives good image to the government and the nation at large.

1.4.3 Organizational strategies for corruption prevention

Merriam Webster dictionary defines organization as an administrative and functional structure (as a business or a political party). It also defines strategy as "the art of devising or employing plans or strategies towards a goal. Therefore, organizational strategies for corruption prevention represent those plans and mechanisms employed by entities in order to attain a specific objective

aimed at inhibiting corruption. Barker (2006) advanced some useful corruption prevention and control strategies. These strategies for crime prevention can also be applicable to corruption prevention in an organization.

For prevention, some of the strategies include:
- Educating the public: de-socialization, re-socialization
- Increased supervision: on-hand, feedbacks, layered
- Sustained monitoring: physical, regular
- Internal policing: as standard work procedure/policy

In terms of control of corruption, Barker suggested three major strategies:
- Decrease the opportunity: plug loopholes, decentralize power, reduce ability to dispense incentives.
- Undermining group support for corruption: increase collective guilt, increase group honor, reward, increase collective shame.
- Increase the risk of committing corruption: high punishment, denial of benefits, other administrative sanctions.

A careful examination of the prevention and control strategies indicate that there is not much difference between them. This may explain why Pease (2002), writing on crime reduction, used crime prevention and crime reduction interchangeably (p.948). Both are used for the purpose of crime control, including corruption control. Like crime, it would be unreasonable to expect that corruption can be prevented completely. However, it can be substantially, if not drastically, reduced. There would always be a few hardened and unrepentant 'corruption addicts' who would always hope that they would not be caught, brought to justice, and sanctioned, such people should be weaned off corruption by the certainly and severity of the punishment for corruption.

Equally important in the discussion of organizational strategies for corruption prevention is the theory of Donald R. Cressey (1919-1987) where he wrote on "why a trusted person commits fraud." According to Cressey, for corruption or fraud to occur there must be a convergence of the three elements (Opportunity, Pressure and Rationalization). Therefore, for an effective organizational strategy in corruption prevention, one must work on the element of pressure or motivation, that of opportunity as well as rationalization (Justification).

There are likely challenges that could emanate from instituting corruption prevention in an organization. Such challenges may include lack of consensus, resistance, poor planning, etc. Participants would learn here that communicating organizational goals and objectives, proper planning, effective disciplinary measures would most likely help overcome some of these challenges.

1.4.4. Developing a corruption prevention plan

The need to develop corruption prevention plan cannot be overemphasized. A corruption prevention plan is a proactive initiative designed to drastically reduce, it does not stop the incidence of corruption in any society or organization. In line with Walklate (2003), suggestion on crime prevention, a corruption prevention plan can be targeted at the following:

1. **The offender:** this refers to the corrupt person, i.e. the person who demands and receives bribes or gratification for carrying out his normal paid duties. A corruption prevention plan

developed in line with the offender would see to it that they would be caged through laws and rules making it difficult for them to intervene in official business. Similarly, the strict enforcement of the laws and rules in official business must be a priority.

2. **The victim:** this refers to the person who (in the case of bribery for instance) gives either willingly or unwillingly. The victim is often forgotten or even neglected in the incidence of bribery, as an aspect of corruption. However, without a willing or comprising victim there would be no corruption in the first place. Developing a prevention plan along this line would encompass clearly laid out and strictly enforced sanctions against victims in corruption cases. It is important to add that the victim may be the society, organization, or the citizenry. The problem in this case is that the application of sanctions is usually difficult as the 'victim' here may not even be aware of what is going on. In other words, there are instances where gullible persons are made "victims" thereby suffering what they are unaware of.

3. **The Environment/community:** this refers to the place where corruption takes place. It can be the office, church, school, the community or indeed the highway. Developing corruption prevention plan in this section would centre on giving officials better incentives such as improved salaries, allowances and promotions as at when due. Again, this should be explicitly formulated code of conducts with sever and swift execution of sanctions.

1.4.5. Designing a Corruption Prevention Plan

Corruption prevention plan is about changing, national / organizational features that allow corruption to occur and possibly go unnoticed or unreported. Strategies incorporated in the corruption prevention plan should address issues such as: accountability, efficiency and effective administration. They should focus on: Improving systems and procedures, changing the attitudes citizenry/staff, and improving the overall integrity and performance of the nation/organization.

Levels of Corruption Prevention

Levels at which a Corruption Prevention Plan can be developed include:
- National- focuses on the nation
- Sectorial-focuses on manageable area e.g. transportation, etc.
- Organizational focuses on organization

Process of Corruption Prevention

In fact, many organizationorganizations are already doing a lot in the area of corruption prevention although some just call it something else.
Fundamental management tools such as;
➢ documented and current policies and procedures,
➢ clearly defined and understood roles and responsibilities,
➢ supervisory and accountability structures,
➢ and efficient decision-making systems

Steps
1. Conduct a Desk Review to identify current position and gaps.
2. Call a stakeholders (management and staff) meeting to discuss the gaps and what/how to remedy them.

3. Draw up a draft plan.
4. Call a stakeholders validation meeting and fine-tune the plan.
5. Submit to management for approval.

Important Factors in Developing and Implementing a Corruption Prevention Plan

Four important factors in developing and implementing a corruption prevention plan are:
• **Management commitment**
Management behavior and expectations play a significant role in shaping the ethical culture of an organization. All management staff need to be aware of the plan's import and the resources and effort they should commit to it. Staff with responsibilities for driving corruption prevention needs to know what these responsibilities are.
• **Staff commitment**
Staff need to be part of the formulation process that will help them see the benefits for themselves and the organization and understand that management is serious about preventing corruption. If staff are not part of it, they feel that the corruption prevention plan is imposed on them from above, thus, they are unlikely to feel committed to its goals or implementation. The plan is more likely to work effectively if staff are carried along.
• **Resources**
The allocation of sufficient resources is crucial to the success of a corruption prevention plan. The organization must have a person with the time, skills and support to drive the plan and to play a leadership role and be able influence to motivate others to fulfil their responsibilities. If there is a commitment from the top, if staff and sufficient resources are allocated, then the implementation of the plan will be a cost effective exercise.
• **Networking**
Many organizations have already done a lot of work on developing effective corruption prevention strategies. Thus, contact with people in organizations similar to yours who have been involved in this work will provide some ideas which you can tailor to meet the needs of your organization. Most people are quite happy to share their expertise and discussing the issues and pooling ideas often leads to benefits for both organizations.

Guideline for Corruption Prevention

Although corruption prevention plans will obviously vary from organization to organization to meet particular needs and circumstances, there are some key aspects that should form part of every corruption prevention plan. The following guidelines will provide a framework to help organizations develop and implement their corruption prevention plan:
• The policy must clearly define who is responsible for preventing and detecting corruption in the organization and for implementing different aspects of the corruption prevention plan.
• Organizations should review all their functions and operations and assess the nature and level of corruption risks in each area.
• Organizations should develop and implement integrated corruption prevention strategies to meet identified risks
• Organizations must set a timetable for developing and implementing their corruption prevention strategies.

- Organizations need to have an awareness-raising program to make sure that staff understands the organization's focus and commitment to corruption prevention.
- Organizations need to promote an awareness in the community that corruption within the organization is not acceptable and complaints will be dealt with.
- Organizations must have an effective internal reporting system that encourages staff to come forward when they suspect corrupt conduct, maladministration or substantial waste.
- Organizations must have a clear policy and detailed procedures for reporting corrupt conduct to external authorities such as the ICPC. EFCC and the Police.
- Organizations should develop expertise and appropriate policies and procedures for handling and investigating suspected corruption.

Activity

Taking into account the respective organizations the participants are from, each participant should design a skeletal corruption prevention plan for a particular act of corruption that can arise in the organization. Participants are to be guided by the following key indicators as taught in the sub-module i.e.

    i.   How to identify the gaps or leakages or abuse etc
    ii.   Conducting s stakeholder Meeting
    iii.   Drawing a plan
    iv.   Fine-tuning the plan for validation
    v.   Getting approval for the plan.

1.4.6. Sustaining a Corruption Prevention Plan

Corruption prevention is a continuous activity; hence, there must be a way to sustain whatever plan has been put in place. David Cameron, a former United Kingdom Prime Minister once said in a summit that '…the things we want to see – countries moving out of poverty, people benefiting from their nation's natural resources, the growth of genuine democracies – will never be possible without an all-out assault on corruption…for if we continue to show the courage and political will to speak and cut against corruption, we can ultimately defeat one of the greatest enemies of progress in our time' (http://theguardian.com/commentisfree/2016/may/11).

Without the political will to sustain corruption prevention plan, it won't stand the test of time. The Oxford English dictionary defined political will as political intention, desire or commitment on the part of government to carry through a policy, especially one which is not immediately successful or popular. A committed government in corruption prevention especially in a country like Nigeria must be prepared to make policies that are favourable to the cause. Although these policies might not favour some, especially those that benefits from the system, the government must nonetheless should be prepared to follow it through regardless of the opposition that may come from it.

According to Kpundeh (1999), lack of political will to systematically sustain corruption prevention will allow abusive practices to continue and with time institute corruption as a way of life. When corruption becomes a way of life, it becomes really difficult to change. Similarly, Ugoani (2016) argues that absence of political will at the top will lead to general lack of commitment to make and enforce laws, and even punish those that are corrupt.

Although past administrations (not excluding the military) have shown the desire to combat corruption, it appears that the political will is never given space to grow as it is quickly stiffened. According to Ugoani (2016:74), "political will must be given space to grow from within a political system and eventually becomes an integral part of the political, social and economic processes. Lack of political will in Nigeria have led people like (Hopkinson & Pelizzo, 2006) to conclude that recommendations and legislations to prevent corruption are hardly implemented.

MODULE 2:0 CORRUPTION PREVENTION METHODS AND CASE STUDIES

Chapter   **2.1.0. Corruption prevention methods**
         2.2.0. Factors mitigating against corruption prevention methods
         2.3.0. Response to corruption

Overview
After topic one, the participants were expected to have been introduced to the meaning and the various frameworks surrounding corruption. It is expected that the knowledge of this would act as a foundation that would stimulate the participants in this section. Consequently, the participants would be stimulated in various capacities to learning the necessary methods that can be applied in preventing corruption. Additionally, participants would be introduced to cases of corruption witnessed in Nigeria to enable the participants drive home the issues raised.

General objective
At the end of the topic 2, participants would be able to:
- Identify the various corruption prevention methods
- Evaluate the roles of each
- Apply these methods in their organizations
- Identify factors mitigating against corruption preventions
- Make reference to corruption cases or situations that can be used to draw conclusions on similar situations
- Point out real life (If any) corruption experience to stimulate class discussion

Learning Objectives
   After this module, participants should be able to:
- List and Explain various corruption prevention methods
- Evaluate each corruption prevention methods
- Justify the roles of each in corruption prevention
- Apply these methods in their organizations

There are various methods of corruption prevention. This module is dedicated to looking at some of these methods. It is broken down into many parts. At the end, the participants will be given some activity based on these and assessed as well to enable them build the momentum to apply these methods.

2.1.1. Introduction
An in-depth look at corruption in Nigeria may leave one with the intention to prevent it in despair. Indeed, corruption prevention is a task especially in a nation where it has eaten really deep. Nonetheless, participants must keep in mind that countries with deep commitment to combating it have recorded great success in anti-corruption war. For instance, England endured a century fight against corruption to record significant progress in anti-corruption war. Similarly, Hong Kong and Singapore have recorded great success by moving from being corrupt to being clean to a reasonable extent according to corruption perception index. Hence, participants must be enjoined that corruption can and will be prevented with commitment and the application of these methods. In addition, reducing corruption does not just rest in the hands of governments alone but individuals in the society as well that are committed to the cause (Mashal, 2011).

2.1.2. Education/Public Enlightenment

Education is the process of inculcating knowledge and enlightenment is the process of making people to be aware of something. Education and public enlightenment is critical in corruption prevention. Having understood that the fight against corruption is a collective war, members of the public must be fully educated and enlightened on the causes, manifestations, consequences and implications of corruption through seminars, workshops, symposiums, etc. This has the capability to foster public support on corruption prevention. There are agents that could play a role in education and public enlightenment. Some of them are:

2.1.2.1.   The Media

The Encarta English dictionary defined the media as the various means of mass communication considered as a whole, including television, radio, magazines, and newspapers, together with the people involved in their production. The media has a far reaching capability that can be channeled towards preventing corruption through education and public enlightenment. Eshemitan (2015) reporting for Independent newspaper on the views of Lanre in a stakeholder's 2-day Media roundtable on Anti-Corruption Reportage that held in Lagos, posited that the media can play critical roles in corruption prevention through playing these roles:

- Watchdog of the society by upholding the right of the public to know the truth
- Setting a public agenda for the institutionalization of transparency and accountability
- Accord higher priority to monitoring, tracking and reporting of the procurement process
- beaming appropriate searchlight on the extractive industries and
- exercising oversight over transparency institutions and agencies

To achieve these, Transparency International (2016b) posits that three things must be done to enable the media gain ground in corruption prevention.

❖ **Ownership of the media:** This is crucial factor in the independence and integrity of the media. If the media is owned by the government it is more likely to be influenced for their interest thereby stifling investigation and diverting attention.

❖ **Funding:** Like the saying goes, "one who plays the piper detects the tune," how the media is funded will go a long way in determining how transparent and fair they are in reporting information gathered. Of course, combating this demands asking media agencies to disclose their financial information and source of funding.

❖ **Integrity of Journalists' work:** Journalists are the backbone of the media. Their integrity has a lot to do with the success of the media in corruption prevention. They have to be prepared to report news following all ethical standards. Question of integrity in the media can be due to:
   o Lack of professional standards due to limited resources or narrow interest
   o low quality control
   o low salaries and
   o low technical capacity

2.1.2.2.   Social media

Social media had to be given special attention because they have not only entered mainstream culture but acts as a source of public enlightenment. Notably, it has successfully transformed itself as a tool capable of enrolling social change in the society. According to Kaplan and Haenlein (2010)**,** Social media is a group of Internet-based applications that build on the ideological and

technological foundations of Web 2.0 and allow the creation and exchange of user-generated content.There are many different forms of social media, they include: magazines, Internet forums, weblogs, social blogs, microblogging, wikis, podcasts, photographs or pictures, video, rating and social bookmarking. Enabled by ubiquitously accessible and scalable communication techniques, social media has substantially changed the way organizations, communities, and individuals communicate (Kietzmann, Hermkens, McCarthy & Silvestre, 2011).Using social media to fight corruption may seem strange to many but participants must know and begin to appreciate the role that the social media can play in the fight against corruption. Although the social media is an important tool in fighting corruption, it should not be relied on as the only method since combating anti-corruption requires more offline efforts. Bauer (2014), writing for The World Bank noted that social media can help fight corruption through two distinct means:

❖ **Analysis, commentary and advocacy**

This section takes the part of blog posts, legal reviews and presentations that could help impart knowledge or seek to spread the word of a particular topic. There are currently many social media blogs that are dedicated to analyzing cases of corruption and these exchanges that take place on the social media helps to make reporting on anti-corruption more vigorous as intense. Participants are advised to seek out such platforms on social media.

❖ **Investigation and crowd-sourcing**

This part allows websites to investigate and source for crowd in websites that allow volunteers or end users to provide information and feedback. Those fighting anti-corruption through this means could use this to monitor cases of bribery, extortion, embezzlement and gain feedback from other sources.

Although, social media can play an important role in corruption prevention, care must be taken not to completely rely on it. This is because authenticity of information gathered through the social media may not be completely reliable. In addition, those selected by agencies to handle social media interactions should be critical and able to maintain a good public relation

2.1.2.3. Civil society

The online dictionary defines civil society as the aggregate of non-governmental organizations and institutions that manifest interests and will of citizens. It is made up of groups or organizations that works for the interest of the citizens but at the same time operate outside of the governmental. They include the family, and the private sphere that is separate from government and businesses.

The United Nations (UN) recognizes the importance of partnering with civil society, because it advances Organizational ideals and societal ideals. Also, they have the society at heart. Strong partnership among the citizens, civil societies and government is very important. It helps in combating corruption and also building integrity in a nation. This is essential in corruption prevention.

Forms of civil society:

- Activist group
- Charities
- Clubs (sports, social, etc.)
- Community organizations and community foundations
- Religious organization
- Social enterprises
- Trade unions
- Voluntary associations

- Political parties, etc.

The federal government also recognizes the importance of partnering with civil society organizations. In fact, Part V, Section 19(b) of the Public Procurement Act 2007 tasks the Bureau of Public Procurement with the responsibility to screen Civil Society Organizations (CSOs) that will observe Procurement Processes in MDAs. Similarly, the Open Government Partnership (OGP) launched in 2011 recognizes the importance of bringing civil society organizations and government as true partners at both the national and international level. At the national level, governments work with civil society organizations to develop and implement their OGP national action plan. At the international level, OGP is overseen by a Steering Committee composed of representatives of governments and civil society organizations in equal numbers (see link below for further reading).

Transparency International listed some roles that civil society can play in corruption prevention:
   a. Act as watchdog through exposing corruption cases, corruption prone areas within the legal and administrative system
   b. Raising public awareness through publicizing some indices and reports
   c. Proposing alternatives for controlling corruption
   d. Could act as an accelerator of international, national and local anti-corruption initiatives
   e. Participating in the decision-making process to enhance transparency and fairness
   f. Providing protection for corruption activists
   g. Monitoring and evaluating anticorruption plans
   h. Building a coalition among different sectors of the society for fighting against corruption
   i. Act as role model of integrity and good governance

As participants engage civil society organizations in corruption prevention, they should be cautious. This is because not all civil society organizations are as they appear to be. Participants are encouraged to engage approved CSOs from agencies like BPP and ICPC.

> **Further reading On OGP:** https://www.opengovpartnership.org/about/working-groups/civil-society-engagement

2.1.2.4. National Orientation Agency (NOA)

The National Orientation Agency (NOA) has critical roles to play in corruption prevention. They are tasked with communicating government policy, staying abreast of public opinion, and promoting patriotism, national unity, and development of Nigeria. The national orientation agency has the capacity to drive citizens-led anticorruption campaign that includes communicating the values of Nigeria and the societal dangers of corruption to Nigeria. When such campaigns are targeted at the youths it could help build a generation of people who would see corruption as morally wrong and therefore refuse in taking in it.

2.1.3. Preventing Corruption through Reforms

Strengthening the legal, financial, economic and political institutions have critical roles to play in corruption prevention. They can be strengthened through reform. Reform simply means to improve something by removing faults or inconsistencies. Preventing corruption could be through reform

– that is designed to not only repair the tarnished image of a country but also prevent future occurrences.

Transparency International (2016) posits that reforms directed towards improving financial management and also strengthening the role of auditing agencies have been more promising in curbing corruption than public sector reform. This reform also drives the internal control mechanism which helps in detecting and preventing fraud. An instance of such reform is the disclosure of budget information, which prevents waste and misappropriation of resources. At the individual level, disclosing or making financial information available to all the members of the public at any time they may need has the potency to discourage corrupt practices. When financial information are shrouded in mystery or closed for public consumption, it creates room for diversion and all forms of corrupt practices. In that light, the new whistleblowing policy introduced by the federal ministry of finance is a type of reform or initiative that is already yielding positive returns.

Centre for Democracy and Governance (1999) outline two major types of reform that can play a role in corruption prevention. They are institutional and societal reforms:

2.1.3.1.   Institutional reform

The essence of institutional reform is to to limit authority, improve accountability, and change incentives. These measures target government institutions and processes in all branches and levels of government. Institutions that can be reformed include economic institution through deregulation, unbundling, tax simplification, privatization, etc.; financial institutions through TSA, auditing, etc.; and legal/judicial institutions through independence of the judiciary, funding, legal innovations, etc. Generally, these can be viewed in the following ways:

❖ **Limit authority:** leaving everything in the hands of government leaves them with too much power that can be appropriated for personal aggrandizement at will. Some of the ways of limiting authorities are:
   • **Privatization:** this is a means of removing control of economic activities from the hands of governments through limiting opportunities for corrupt financial dealings and employments. As promising as this is to corruption prevention it can be a gateway for further corruption if not properly checked. To prevent this, there should be adequate framework and competition to check the activities of the privatized companies to protect consumers.
   • **Liberalization**: according to Centre for Democracy and Governance (1999), Liberalization offers a more straightforward means to limit state authority. Eliminating tariffs, quotas, exchange rate restrictions, price controls, and permit requirements simply strips officials of the power to extract bribes. At the same time, removing such controls reduces transaction costs, eliminates bottlenecks, and fosters competition.
   • **Competition in public service:** public service should be allowed to have as much competition as possible. This is because competition helps to remove the monopoly of government offices which most times can be used to perpetrate corrupt activities.
❖ **Improving accountability:** those in public service sometimes treat their position as if it is their personal property. Improving accountability helps to remind those in the public service that they are responsible to the members of the public. Improving accountability can be in the forms of:

- **Financial Disclosure:** This means being required by law that public officers disclose the information about their assets and income so as to act as a deterrent to them.
- **Freedom of Information Legislation**: Freedom of information legislation improves accountability by enhancing the transparency of government operations. It allows open access to data held by governments to citizens. By this, the secrecy surrounding government's offices and the opportunity to partake in corrupt act is quickly subverted.
- **Whistle-Blowing:** This encouragesthe public to report cases of corruption with the promise of a per cent provided the tip led to the recovery of it. As aforementioned, this type of reform is already yielding positive return
- ❖ **Realigning incentives:** institutional reform to combat corruption would not be complete without a well packaged incentive to reward ethical behavior in the public service. This single act could a long way in building sound ethical code of conduct and commitment in the discharge of duty. In addition, incentives are capable of bolstering morale, professionalism, and productivity.

2.1.3.2.   Societal reform

In order to mobilize political will for change, Centre for Democracy and Governance (1999, 13-14) handbook on fighting corruption suggests societal reform. Accordingly, they noted that societal reforms help to generate information about the costs and causes of corruption in the hope that it would stimulate the demand for change. Societal reform could be:
- **Surveys:** which helps to define the problem and focus on efforts to address it
- **Public relations campaigns:** which work to increase understanding about the harm done by corruption and the ways to fight it.
- **Workshops:** which offer an effective venue for changing attitudes about corruption.
- **International pressure:** This is pressure from foreign government and international organizations that can mobilize and sustain domestic efforts to fight corruption.

2.1.4. Reporting Platform

According to UNODC (2001:31), "Institutions with effective integrity programmes generally have well-developed procedures to deal with potential dishonesty and the complicating factors of supervisory and personal relationships." The primary goal is for allegations to be brought promptly and accurately to the person in authority for appropriate action. Reporting platform has the tendency to discourage citizens from engaging in corrupt act. There are, however, challenges encountered in reporting platforms which ought to be dealt with so it could be efficacious. Some of those challenges are:
- Power supply
- Limited access to ICT
- Lack of commitment
- Fear if victimisation
- Distrust of those in authority, etc.

2.1.5. Effective ICT Application

Information and communication technology (ICT) is an extended term for information technology (IT) which stresses the role of unified communications. Attempting a unified definition of ICT is

difficult because the concepts, methods and applications is constantly evolving overtime. The broadness of ICT covers any product that involves the use of any computers, storage, networking and other physical devices, infrastructure and processes to create, process, store, secure and exchange all forms of electronic data (Zuppo, 2012).

We are currently in a world of information technology with over three billion people having access to the Internet. This technology has constantly transformed the way people and the society interacts. Also, information technology has opened more opportunities for business, education, etc. the emergence of this could as well help speed up corruption prevention campaign. This is because access to information is paramount in corruption prevention.

According to World Economic Forum (see more in further reading), information technology can help prevent corruption through:
1. **Big Data:** Technology is being used to create transparency across organizations by increasing automation, accuracy and frequency across processes. International organizations are at the forefront of this revolution developing innovative software to detect and deter fraud and collusion. It is now easier to detect patterns and suspicious in transactions and other areas.
2. **Data Mining:** In public procurement, data mining is being used for auditing in order to monitor when governments are issuing bids and to identify red flags, patterns of collusion and false information. It is also being used to identify 'corrupt intent' in payments or transactions through data visualization.
3. **Mobile Application:** Mobile technology and applications are being utilized to harness data and gain faster insights. In developing countries this technology is being used to empower citizens even in remote areas, making information more accessible. In addition it can be used to detect and report corruption cases.
4. **Francis tools:** The UN's Sustainable Development Goals (SDGs) have spurred increased investment to improve data for monitoring and accountability. To share innovation and technology for the common good, the UN has proposed to create a global 'Network of Data Innovation Networks' that would bring organizations and experts together to contribute to the adoption of best practices for monitoring and improving efficiency.

In summary, the use of ICT in corruption prevention helps in:
- Promoting transparency,
- Opening government data to public scrutiny,
- Automating government processes,
- Restricting discretion of officials and
- Limiting human interface that people could take advantage of

2.1.6. Ethical revival and naming and shaming

Ethical value refers to the standards and principles of social norm that guides the actions of people in society in terms of what is acceptable or not. It refers to the standard evaluation of what is good, expected and acceptable in society. The view is that these standards have been seriously eroded in the Nigerian society such that corrupt practices are now tolerated; hence the urgent need for a revival.

Stemwedel (2013) defined naming and shaming as the practice of responding to bad behavior (corruption) by calling public attention to it. This can be done by exposing both the individual and the act in other to elicit public condemnation and prevent future occurrence. Braitwaite (1989) defined it as "all societal processes of expressing social disapproval which have the intention of invoking remorse in the person and condemnation by others who are aware of the shaming".

The rise in corrupt acts has been partly blamed on decline in ethical values. There are outcry of decline in code of ethics in our work place, educational institutions and the society at large. People are seen to no longer have regards for the right conduct in places they find themselves. Preventing corruption will require the revival and promotion of ethical values in all part of the society staring from the grassroots. Participants will learn the importance of honesty, integrity, conscience, principles in any place they find themselves. In like manner, persons, groups and organizations not adopting the appropriate standard in the conduct of business should be named and shamed. This means that they would be publicly proclaimed as doing something wrong. This is important as many cases of corruption in Nigeria have been shrouded in secrecy without full disclosure of the perpetrators.

Naming and shaming as a corruption prevention strategy:
- Publicly responding to bad behavior like corruption can be useful to stop corruption in progress or prevent corruption from occurring in future.
- It is also useful in calling attention to the harm the corruption does to individuals and society.
- It affirms the commitment of individuals or communities that corruption is actually bad.
- It shows that both individuals and communities see themselves as having a stake in preventing corruption.

Meanwhile, it is expected, as it is done in some African countries, that public servants who have performed their duties diligently should be named and famed. This is to encourage others to do the same.

2.1.7. Effective Monitoring and surveillance

Monitoring means supervising activities in a project to make sure they are in line with the mandates of an organization, department or agencies. Surveillance on the other hand is the monitoring of behavior or activities or events for purposes of managing, influencing, directing or protecting people. A close look at the two concepts above shows that they are very closely related. However, surveillance is more discreet than monitoring. Monitoring implies close supervision by responsible officers over the activities of subordinates who may or may not be aware that they are being observed in the course of carrying out their duties.

In monitoring, supervisors and other responsible officers look out for acts of:
- Indiscipline
- Corruption
- Incivility to clients/customers

It is a mechanism keeping staff on their toes or alive to their responsibilities. Surveillance is a higher and often more sophisticated way of monitoring. It generally is an "undercover" or "covert" operation. According to Lyman (2011), It may target:

- A person
- Vehicle
- Location

Types of surveillance
- **Foot surveillance:** this may be applicable to policemen on the highway or custom officers at the borders, seaports or highways.
- **Motorized surveillance:** this can take place with the use of a vehicle to observe the activities of staff on ground
- **Electronic surveillance:** this uses electronic gadgets to gather information or intelligence on any issue, including corrupt activities. Tools used for collection of information here include:
  - audio microphones,
  - video cameras,
  - telephone calls and
  - electronic mails

UNCAC encouraged the use of surveillance in corruption prevention
- **Covert surveillance:** here law enforcement officers secretly observe, listen to or watch corrupt activities without the knowledge of those involved. This recording devices can be hidden in the places where public officers work
- **Consensual surveillance:** this often has to do with the knowledge and consent of one of the parties to an activity or conversation. A good example here is that of a female student who refuses the advances of a randy male lecturer and goes ahead to involve the security agents to secretly film or tape her meeting with the lecturer in a hotel room
- **Overt surveillance:** this type of surveillance is done openly with the knowledge of all the parties to the meeting or activity. Example, the use of CCTV. This tends to discourage crimes, including corruption since everybody is aware that a monitoring or security device is installed in the location (e.g. this location). This is for general security against crime. It can also be used for purposes of bribery, extortion, etc.

Typical requirement for electronic surveillance
Unauthorized invasion of the privacy of individuals is generally prohibited in most states' constitutions as part of human rights violations except on grounds of:
- Judicial Orders/Authorization

The courts can authorize the use of electronic surveillance "ex parte" (without warning to the target) on reasonable grounds from the police or other law enforcement agents.
- Extent Of Invasion Of Privacy

This depends on the type of surveillance to be used – whether phone conversation or reading e-mail messages
- Recording And Presentation As Evidence

To ensure accuracy and authenticity, back-up copies, as additional precaution, are essential for prosecution purposes. Recording can be by video tapes or other recording devices. The most serious challenge in surveillance is to ensure that suspects' suspicion is not aroused

2.1.8. Improving Internal Control Mechanism

Internal control mechanism are methods put in place by an organization to ensure the integrity of financial and accounting information, meet operational and profitability targets, and transmit management policies throughout the organization (http://www.investopedia.com/terms/i/internalcontrols.asp). Internal controls work best when they are applied to multiple divisions and deal with the interactions between the various business departments.

Forms of Internal Control Detective Controls:
This is a type control focuses on measures set up to identify instances where certain acts which might not amount to corruption in themselves begin to manifest, before it begins to breed corrupt acts. The essence is to curtail the continuation of such likely corrupt acts before they mature to full blow corruption. Internal control focuses on two major areas:
Corrective Controls: This type of control has deterrence as it most potent measure. This internal control mechanism appropriates adequate corrective regime on wrongful and corrupt acts, in such an effective way that it discourages anyone with intention to participate in the act. It is important that the control measure is effective, precise and not subject to delays.
Preventive Controls: This type of control focuses on reducing or eliminating the opportunities that breeds corrupt acts or her seeds. The measure under this form of control decentralize processes or procedures prone to corruption interference or in the alternative creates more gain for following the laid down processes and procedures. Gains like reward, protection, effectiveness and absence of delay.

Elements of Internal Control
Control environment
Scalable and flexible risk assessment
Control activities
Effective Information and Communication channels
Robust Monitoring
Humans

Tools of Internal Control
Clear Policies
Staff Performance Evaluation
Client Feedback
System Audits
Training and Retraining

Common Weaknesses of Internal Control
Human factor:
Inadequate/Inefficient segregation of duties
Inadequate checks and balances

2.1.9 Separation of Duties and Job Rotation

Separation of duties (SoD) (also known as "Segregation of duties") simply means having more than one person required to complete a task. It is an internal control intended to help prevent fraud

and error from taking place in an organization. Also, it acts as a check and balance on the authority of employees or persons in the organization.

Although organizations could have different arrangement, a typical business functions in most organizations could be categorized into four functions:
- authorization,
- custody,
- record keeping, and
- reconciliation

Whatever the arrangement, in a perfect separation of duty, no single person should handle more than one function. That is, one should not be in-charge of authorization and at the same time be in charge of custody. Participants should therefore note that centralizing authorities in one person could breed room for corrupt practices.

Principles of separation of power
Organizations could adopt any of these principles as they apply separation of duty:
1. Sequential separation: an instance is requiring two signatures before the completion of a task.
2. Individual separation: this could mean having at least two different people in authority who have full autonomy.
3. Spatial separation: this means a single task may be required to be completed in two different locations.
4. Factorial separations: this means that several factors are considered before certain task is completed.

Pattern for Separation of Duty
1. Start with a function that is indispensable, but more likely to be abused
2. Divide the function into separate steps,
3. Assign each step to a different person
It is obvious that a person with multiple functions has the opportunity to abuse such power. Separation of duties helps to reduce the amount of function a person could have in an organization. Although it could be time consuming, it is quite a useful approach to corruption prevention

Job Rotation
Separation of duty and job rotation is quite similar yet they are different. Unlike separation of duty that allows for functions to be broken down, job rotation however, sees that an employee does not hold one particular task throughout their employment. One who works as a cashier today could be moved over to the reception unit. Aside from the fact that it reduces stress, promotes flexibility, job rotation also helps build-up employees who are all-rounder in the affairs of the organization.

Job rotation is beneficial to the employer as well as the employee. To the employer, job strengths of employees are learnt as well as knowledgeable and resourceful workforce. To the employee, it reduces boredom and serves to develop one.

Job rotation is good for corruption prevention. This is because it has been observed that people can engage in corrupt practice when they have low morale. Hence, they become complacent. Job rotation could break complacency and halt any scheme to commit fraud. Moreover, it can scatter

employees who have the intention to collude in an organization. In addition, it helps fresh eyes spot areas of loopholes and false transactions.

In spite of the importance of job rotation, it should be handled with care. Participants should be advised to rotate based on need as well as in consideration of skills and competence level to avoid putting a square peg in a round hole.

Case Study on separation of duty and Job rotation
A trusted accounts clerk stole more than £330,000 from a building company to pay for her online gambling habit - and 60 jobs are now in jeopardy because of her thefts. Cardiff Crown Court heard how Beverley Pearce, 54, paid herself up to five times a month from the company accounts. Pearce began secretly transferring funds to herself in 2011 and carried on for five years. But she was found out in 2016, after 16 years of service to the company, when another employee noticed 90 unauthorized transactions from the company account to a B. Pearce. The court heard building company Brecongate is now struggling to survive because of her crimes. A total of £339,817.82 was taken from the company account which Pearce had exclusive access to. The same account was used by the company to pay its 60 members of staff. Pearce worked as an account supervisor for Brecongate, a building contractor company based in Upper Boat, near Pontypridd. Prosecuting, Claire Pickthall, said: "She ran into financial difficulties and she took out a mortgage to pay for an extension. "She couldn't afford the mortgage anymore, and her borrowing had spiraled out of control. "One month she overpaid herself, and no one noticed so it just went on from there." Ms Pickthall read victim impact statement from Paul Jones, managing director at Brecongate, which said: "The money that she has taken has severely damaged our business. "After three months of continued stress, I have my doubts as to whether we can survive. Sixty people could lose their jobs." Source:http://www.walesonline.co.uk/news/wales-news/woman-stole-more-330000-building-12563646

2.1.10 Review of the Various Methods of Corruption Prevention

Having been introduced to all these methods of corruption prevention, participants are enjoined to approach these methods with care and not inviolably. These methods can be applied in consideration of the context and environment. Participants are advised to be innovative and creative in corruption prevention because a method that worked in Europe may not necessarily work in Nigeria due to different culture and the contextual issues surrounding it. Similarly, according to Center for Democracy and Governance (1999) a strategy for corruption prevention should be designed to fit the prevailing circumstances surrounding the corrupt practice and of course the nature and form of it.

To tackle a corruption case in a government institution requires, requires first an assessment of the extent, forms, and causes of corruption for the specific government institution. In addition, the commitment and political will of those in authority should never be undermined because they might be the decider on the success or failure of it. In like manner, an analysis of the interests should also be carried out with specific interest in who gains/losses with the current situation of things as well as who is likely to support in the process.

Activity
1. The trainer is expected to first initiate class room discussion on the opinions of the participants on corruption prevention methods discussed
2. Participants are expected to highlight which is applicable within the short and long term frame
3. Also, they are expected to play an advocacy role in corruption prevention through the media

Assessment
1. study various media campaign against corruption and identify its strength, weakness and achievements
2. study through observation the various corruption prevention methods currently being used in their organization stating how it can be strengthened

Chapter   2.2.0. Factors militating against corruption prevention methods
2.2.1. Introduction
2.2.2. The problem of definition
2.2.3. Lack of Political will
2.2.4. Lack of synergy (conflicting report)
2.2.5. Lack of Societal norms
2.2.6. Weak Institution
2.2.7. Weak Reporting culture

Learning Objectives
This module is expected to make participants
- Recognize factors mitigating against corruption prevention
- Describe ways of overcoming these challenges

Overview
This section looks at various factors mitigating against corruption prevention methods. The participants would be properly introduced to the topic because a proper knowledge of these factors will make participants develop a positive outlook on corruption prevention. The second topic will be focused specifically on the sometimes overlapping issues encountered in defining corruption. The third will look at lack of political will which is paramount in corruption prevention method. The lack of synergy and cooperation that exists among law enforcement agencies is also part of the factors because it prevents information sharing and proper coordination. Weak institution and weak reporting culture would also be looked at.

2.2.1   Introduction

The President of the Federal Republic of Nigeria, Muhammadu Buhari having acknowledged that corruption among government officials is a chronic problem in Nigeria have made many dedicated move towards corruption prevention. This could be observed in various policies such as the Treasury Single Account (TSA), whistleblowing policy, and the recently implemented Mutual Legal Assistance in Criminal Matters between Nigeria and Other Foreign Countries, SB 224, 2017. Similarly, there appears to be a renewed vigour among anticorruption agencies in Nigeria, following the many cases of arrests, retriever and prosecution.

To be fair, previous administration, stretching farther to the military era, has also shown clear intention at preventing corruption. Notwithstanding, there appears to be numerous cases of corruption discovered from time to time sometimes surpassing previous cases in magnitude and dynamism. Participants at this stage would be introduced to some factors that seem to dwarf anticorruption efforts in Nigeria.

2.2.2.   The Problem of Definition

As aforementioned, defining corruption has always posed problem to the international community. In Nigeria, a country made up of people from diverse multi-ethnic and multi-cultural background, defining corruption is in fact more complex. This lack of clear and precise understanding of what corruption entails poses challenges to corruption prevention methods. In a book titled "Collective Action on Corruption in Nigeria: A Social Norms Approach to Connecting Society and Institutions" that was launched by the Royal Institute of International Affairs, London; lack of common understanding of what corruption is was one of the reason it is difficult to tackle corruption in Nigeria.

The former president of Nigeria, Goodluck Ebele Jonathan, once pointed out that "Over 70% of what are called corruption [offences], even by the anticorruption agencies, is not corruption, but common stealing."   Notwithstanding the lack of consensus in the definition of corruption, there seems to be a common agreement that corruption needs to be weeded out because of the damage that it does. Thus, "the definition of corruption needs to be clarified, including the types, the elements, and the legal penalties associated with it" (Mashal, 2011:74).

2.2.3   Lack of Political Will

Although the federal government have always claimed zero tolerance for corruption, notwithstanding, cases of corruption abounds. Some have argued that even when the fight against corruption is actually enforced; it is not targeted at all and sundry. Many consider the fight against corruption in Nigeria to be sectional, political and misleading. With that, it is clear that there have not been a clear and unbiased fight against corruption due to the political will. The fight against corruption must not know party, ethnic group or religious members. It must be objective focused at revealing truth and preening its occurrences.

Similarly, when the administration is willing, fight against corruption may be frustrated by individuals in authority positions. For example, speaking under the theme "Corruption and the Nigerian Economy: Lawyers as Change Agents", Mr. Ribadu named foremost lawyer, Ben Nwabueze, former Attorney General and Minister of Justice, Michael Aondoakaa, and his successor at the EFCC, Farida Waziri, as people who undermined the country's efforts to fight

against the cancer of corruption (Tukur, 2016).This could explain the low level of conviction cases achieved by the EFCC and other anticorruption agencies in spite of the many cases of arrest. Hence, the fight against corruption demands the utmost cooperation of all those in authority to enable it work.

2.2.4   Lack of Synergy (Conflicting Report)

Anticorruption agencies in Nigeria are expected to work together especially on cases of corruption requiring intensified efforts. They are expected to share information that may be useful in the arrest and prosecution of offenders. There are however cases where these agencies are at loggerhead with one another over processes and procedures on matters leading to the arrest, detention, and prosecution of offenders. For example, the arrest of Judges by the DSS was received with stiff condemnation by the EFCC who insisted that the judges were under investigation as of the time of arrest. In essence, there activities crippled the investigation exercise.

Case study: EFCC reportedly not happy with DSS' arrest of Judges

The Economic and Financial Crimes Commission, EFCC, is said not to be happy with the recent sting operation during which some judges were arrested by the Department of State Services, DSS, as it had allegedly opposed DSS' takeover of investigations into some petitions against some judges, which it had already worked on.

The Punch gathered that the EFCC was bitter because it was already investigating some of the judges, who were arrested by the DSS; as the DSS is perceived to have disrupted ongoing investigations being carried out by the anti-graft agency into the alleged corrupt practices by some judges.

The secret police had, arrested Sylvester Ngwuta and Inyang Okoro, both of the Supreme Court; the suspended Presiding Justice of the Court of Appeal, Ilorin Division, Justice Mohammed Tsamiya; Justice Kabiru Auta of the Kano State High Court and Justice Adeniyi Ademola of the Federal High Court, Abuja.

Also arrested were a former Chief Judge of Enugu State, Justice I. A. Umezulike, and Muazu Pindiga of the Federal High Court, Gombe Division.

According to the report, the Federal Ministry of Justice decided to forward the petitions against judges bordering on alleged corrupt acts to the DSS when the ministry discovered that the EFCC failed to act on previous petitions as expected.

Source:http://dailypost.ng/2016/10/13/efcc-reportedly-not-happy-dss-arrest-judges/

2.2.5   Lack of Societal Norms

Norm is a standard pattern of behavior. A behavior that is considered standard in one locality may not be in another. Corruption prevention methods could be dwarfed by some of our social norms. For instance, socially it is expected that people in key and strategic positions should use their positions to favour relations and close associates first before others regardless of qualifications. This is even made obvious by our communal life style where family ties and kin come first.

Similarly, by day, our society is constantly being induced to seeing corruption and other corrupt practices as being normal. This helps to create a cycle of the act that makes corruption prevention methods difficult and herculean. The great section of the society considers it a normal behavior for office holders to use their period in office to amass as much wealth as possible because of lack of uncertainty in government offices. In fact, society frowns at anyone that have occupied any sensitive public office and ended up without houses, fleet of cars and did not position one's relations in key positions. This breads nepotism and other related corrupt acts.

2.2.6   Weak Institution

To be successful in anticorruption war, the institution must be viable enough to sustain anticorruption efforts. Most countries that have recorded great success in anticorruption wars have achieved this through viable institutions put in place to sustain anticorruption efforts. Nigeria's former Minister of finance and Coordinating Minister for the economy, Dr. Ngozi Okonjo-Iweala, once spoke at a forum organized by the Catholic Caritas Foundation of Nigeria under the Catholic Bishops Conference of Nigeria (CBCN), with the theme, "Blocking Leakages in the Economy Amidst Dwindling Oil Revenue" that the lack of institutions, system and processes needed to curb the menace of corruption as the reasons corruption has been so hydra-headed. For instance, having a system that is cash-based (although this is being addressed) makes corruption prevention difficult.

Our institution such as the legal, the educational, and the political have been considered too weak and unable to stand the test of time in corruption prevention. Our religious institutions are not left out as some high profiled and highly respected religious leaders have been noted to partake in acts such as bribery, embezzlement, fraud, giving undue recognition to members who make huge donations not minding where it is from.

2.2.7.   Weak Reporting Culture

Having highlighted the importance of reporting as a factor that prevents corruption, it is noted that we are yet to fully embrace this. Our society is characterized by poor attitude in reporting cases of corruption. Some of the factors that dissuade people from reporting corruption cases are:
   a. Fear of attack and victimization by the reported person
   b. Seeing corruption as a victimless crime
   c. Religious dogmas that requires one to mind one's business
   d. Lack of trust of protection
   e. Illiteracy

Activity
   - Participants would be divided into groups to brainstorm on the factors mitigating against corruption prevention methods in their various institution/organization
   - In plenary, participants would be expected to present the issues raised

Assessment
   ➢ Participants are expected to pointed out how these factors mitigating against corruption prevention can be addressed using two classifications of
       o Short term
       o Long term

Chapter   2.3.0. Response to Corruption
            2.3.1. Introduction
            2.3.2. Designing an effective response
            2.3.3. Delay in response to corruption cases

Learning Objectives
This module will make participants to:
- Define response to corruption
- Devise an appropriate response to corruption
- Identify the various effective roads towards effective response
- explain the implications of delaying a response to corruption

Overview
This section will focus on various ways of responding to corruption. The section will be divided into parts that are broken down to further elucidate the point being made. The first part is the introduction by the trainer on what response to corruption is and the importance of it. The second part will look at designing an effective response while the third part will look at the implications of delaying a response to corruption.

2.3.1. Introduction

Although the core of this manual is corruption prevention, participants will also learn that corruption cases do spring up from time regardless of how much measures are put in place. Thus, an appropriate response should be designed because it helps to prevent a future occurrence which is one of the aims of corruption prevention.

As aforementioned, corruption certainly exists everywhere. What determines how successful the campaign against it will go is how effective the response from government, law enforcement, the media, etc. is when corruption cases are reported or noticed. According to Oxford English dictionary, response simply means a reaction to something. Response to corruption is the reaction undertaken by anticorruption agencies, the society or persons of interest against cases of corruption. An effective response may involve a well-conducted internal investigation that would lead to the discovery of fact; prompt reporting to the Police, EFCC, ICPC and other similar agencies; followed by appropriate disciplinary action.

Independent Commission against Corruption holds that responding effectively to alleged or suspected corruption cases is critical (http://icac.nsw.gov.au). Participants will learn that failure to design an appropriate and effective response to corruption will not only be disastrous but will lead to public distrust which is inhibitive to democratic progress.

2.3.2. Designing an effective response

A well designed effective response to corruption should be detailed enough to contain the processes of solving corruption cases from the beginning to the end. Certain elements should be considered before designing an effective response. Hence, an effective response should include:
- The processes of investigation/inquiry
- Channels of reporting

- The disciplinary action that would be taken, and
- The review processes

2.3.2.1. Investigation/Inquiry

Investigation involves an official enquiry. Investigators are expected to adhere to three basic principles according to ICAC, they are:

- The person being investigated has a chance to have his or her say before adverse formal findings are made and before any adverse action is taken
- The investigator(s) should be objective and impartial, and
- Any action taken is based on evidence (not suspicion or speculation).

The purpose of an investigation is to disclose what transpired, because of this those being investigated should not be treated like they are already found guilty. Since investigations are fact finding exercise, they should be treated with all seriousness and professional conduct. This is because, if it is badly done, wrongdoers may go unpunished; similarly, an innocent person may be wrongfully prosecuted. Without a properly done investigation the judiciary would be handicapped for want of evidence (see case below). Some agencies of governments are empowered by law to investigate cases of corruption. For instance, section 6 of the Corrupt Practices and Other Related Offences Act 2000 confers on ICPC the power to receive and investigate reports of corruption and in appropriate cases prosecute the offender[s].

Investigation requires expertise, skill and periods of training. Hence, it should be left for professionals. Nonetheless, organizations ought to be able to conduct an inquiry of some sort when there are reported or suspected cases of corrupt acts. In doing this, a case theory approach is recommended.

A case theory is a detailed, coherent, accurate story of what occurred. It allows one to follow a "theory of the case" when investigating complex corruption and fraud offenses for instance. Some basics steps of a case theory approach are:

- Analyze the available data to create an hypothesis;
- Test it against the available facts;
- Refine and amend it until reasonably certain conclusions can be drawn.

Case study
Badly done investigation
An FCT High Court in Maitama once discharged Steve Oronsaye, former Head of the Civil Service of the Federation, of the N190 million corruption charges leveled against him. He was docked on a seven-count charge, bordering on breach of trust and diversion of N190 million meant for the committee he chaired. The judge, Justice Olasumbo Goodluck, in her ruling on the no-case submission filed by Oronsaye, held that the prosecution failed to establish a prima facie case against Oronsaye. "There was contradictory evidence by the prosecution witnesses on whether the defendant was still the head of service as at the time he chaired the committee.

> "The court seems to discredit the evidence, suffice it to say that there is no evidence linking the accused with the statutory element and ingredients of the offence with which he is charged.
> "The court of trial must as a matter of law discharge him because it has no business scanting for evidence that is nowhere to be found.
> " I have looked through the case and I am unable to see any justifications for this case.
> "The defendant is hereby discharged," she held.
> source:http://www.vanguardngr.com/2017/05/alleged-n190m-fraud-court discharges-oronsaye/

2.3.2.2. Reporting

Reporting is the next response to corruption prevention. It could be internal or external. Internal reporting has to do with reporting with the appropriate authority in the organization. Organizations should have well-structured channels of reporting to enable proper action to be taken. External reporting, however involves telling the appropriate authority outside the organiation. Agencies such as the police, EFCC, etc. are expected to come in at this stage. This allows for prompt action to be taken to arrest the situation before it gets out of hand. Suspected cases of corruption are not expected to be hoarded but reported as quickly as it is suspected or observed. This may even lead to the discovery of other corrupt related activities.

2.3.2.3. Disciplinary action

Discipline is an appropriate response to corruption cases. The essence of discipline could serve as deterrence to others who might have the intention of engaging in the act. For discipline to be effective, it must be taken by the appropriate people and must follow laid down principles of the legal system. Organizations should have well stipulated disciplinary measures.
The ability to punish or discipline a person found guilty of corruption is an important way of responding to cases of corruption. Disciplinary action should match the misconduct following in accordance with the stated law or act.

2.3.2.4. Reviewing corruption prevention controls

The need to review anticorruption laws is very important. This is because reviews help to determine whether changes are needed by helping to identify areas of failures or shortcomings. As it has come to be noted, corrupt act takes different shapes at different times. Moreover, if it is not reviewed individuals might take advantage of loopholes to commit all manner of corrupt acts. After a breach, it is necessary to review anticorruption laws to prevent future occurrences.
Examples of corruption control measures that can be reviewed include:
- Reporting/ complaints process
- Auditing
- Internal control mechanism
- Separation of duties/Job rotation

2.3.3. Delay in Response to Corruption Cases

Responding to corruption cases is very important; equally important is the time frame of which the response took place. Participants would learn that a swift response is indispensable to the fight against corruption. Most agencies that are paramount in the fight against corruption in Nigeria have constantly been noted to delay corruption cases making it last longer than necessary. Joe Agi (SAN) was reported by Punch newspaper (published online on July 12, 2016 http://punchng.com) as saying that the causes of these delays could be attributed to poorly done investigation which prevents it from establishing a case.

It could be said that one of the reasons for the setbacks encountered in anticorruption war in Nigeria is the issue of delay in response to corruption cases. Delay could result in cases not followed up as soon as it is reported or as soon as it is suspected. This is especially noticeable in high profile cases where suspects and investigations could take decades without appropriate response. Participants will learn that when cases are followed up appropriately it could help prevent future occurrence.

Activity
- Ask participants to brainstorm in small groups on the importance of responding to corruption cases
- Probe wrong response methods currently undertaken by anticorruption agencies in Nigeria using instances
- The trainer will ask the participants to share experiences with groups instances of delayed and timely response witnessed (if any) in corruption cases in Nigeria.

Assessment
- ➢ Using any recent corruption case in Nigeria and highlight as follows:
  - o The response methods used by security agents
  - o How responsive they were using indicators such as days, weeks, months or years
  - o Has the case been concluded, if no why?
- ➢ Participants would be asked to spell out the implication of first making an arrest before proper investigation

MODULE 3:0   BASIC RESEARCH METHODS IN CORRUPTION PREVENTION

Chapter   3.1.0. Overview of social research methods in corruption prevention
              3.2.0. Research ethics in corruption prevention
              3.3.0. Data collection for corruption prevention research
              3.4.0. An outline of normal research activity on corruption

Overview
This topic provides the students with basic knowledge of research in corruption prevention. It provides the participants, working professionals and interested stake holders with the necessary conceptual and methodological tools for undertaking corruption research applicable to a wide variety of topics, contexts and situations.

General Objectives
There are good reasons to learn about corruption prevention research and its methods.
1. The topic offers a good understanding of social science research and methods.
2. The topic affords participants opportunity to learn more about the methods and procedures of using interview and questionnaire instruments to collect data on corruption prevention.
3. The topic will enable participants to gain more nuanced understanding of why, where, and how corruption flourishes using and possible knowledge of what to do about it using corruption research.
4. The lecture and practical activity would help the participants to build knowledge and acquire evidence of corruption vulnerability by testing and analyzing data.
5. Participants should be able to understand and critically interpret existing claims on corruption based on statistical indicators that are a future of general claims on corruption (University of Sussex, 2016).

Learning Objectives
▪ The students would understand the meaning of research
▪ Students would appropriately situate research and indeed corruption research as a scientific endeavour.
▪ They will be able to know the different types of social research
▪ They will be aware of the various types of corruption research.
▪ The students will understand the best ways to conduct corruption prevention research using both quantitative and qualitative data.

Activity
Students should give practical examples of the various types of corruption research using their agencies.

Assessment
Students are expected to identify and discuss the various types of corruption research. The mode of the assignment is essay writing.

3.1.1. Understanding Social Research Methods in Corruption Prevention

According to Babbie (2010), science is a familiar word, yet images of science differ greatly. For some, science is mathematics, physics or chemistry. For others, it is white coat and laboratories.

However, for the purpose of this paper, science is regarded as a systematic method of enquiry about phenomena and the world around us.

Obikeze, (1990) defined research as a systematic process of investigation carried out in accordance to laid down scientific procedure for the purpose of finding answers and solutions to a set of defined problems. From the above definition, it is important that we understand the following:

    a. A research activity is planned and not a spontaneous activity. Therefore investment in mental capacity, time and reasoning is required to design a research.

    b. A research activity is purposeful and aimed at achieving specific objective.

    c. A research activity is systematic and carried out according to laid down procedures to allow for repeatability and verifiability.

Monette, Sullivan & Dejong (1998), define social research as a systematic examination or re-examination of empirical data, collected first hand, covering the social forces operating on a phenomena. Obikeze (1990) further described social research to include any research which has as its subject of investigation human groups, human interactions human relationships, human organizations and institutions. Corruption is a human conduct which usually takes place within social settings. It is a form of deviant behavior which is considered a crime in almost all modern society. The meaning of corruption and the conducts that constitute corruption are also socially determined. Therefore corruption research is an aspect of social research. However, for the purpose of this paper, corruption research refers is the application of social science research methods in the investigation and examination of corruption for the purpose of explaining and predicting the phenomena. It is the systematic investigation of corruption using empirically collected data with the aim of understanding, explaining and seeking solutions to the problem of corruption in society.

3.1.2. Types of Social Research

On a general level, corruption research can be conducted either as applied research, action research and policy research Guthrie (2010). Applied research is concerned with research that is aimed at practical application for the purpose of solving existing problems. It is a research that is aimed at solving or finding solutions to existing practical problems of society. For instance a research on the causes and consequences of corrupt practices among government officials in Abuja aims to investigate the causes and consequences of corruption which is an acknowledged social problem in Nigeria so as to proffer possible solutions and mitigate the consequences. Action research is concerned with working on particular activities in other to make direct interventions and improvements. For instance doing a study on low motivation as a driver of corruption among police officials in Abuja. Policy research is based on practical issues of interest to government and decision makers. Government authorities may have a policy of reducing crime and want to know if the capacity of the Nigeria police is adequate for the crime reduction policy they want to implement. The outcome of this study will determine whether they would embark on new recruitments or otherwise.

3.1.3. Types of Corruption Research

According to Monette, Sullivan & Dejong (1998), there are various forms of corruption research:

    a. Descriptive corruption research: The goal of this form of research is to arrive at a systematic description of phenomena. It attempts to discover facts and describe reality. An example is a research on the prevalence of corruption among junior police personnel in Abuja, or the nature and extent of corruption in the private sector in Lagos, Nigeria. The

objective in these studies is to describe the phenomenon of corruption within selected sectors of Nigeria.

b. Predictive corruption research: This research is focused on predictions about the future direction, manifestation, implications, consequences and occurrence of corruption. It is concerned with making projections about the phenomenon of corruption using the research results. The outcome of the research forms the basis for future projections about corruption. Example, if a study on the relationship between motivation and corruption found that low motivation is a driver of corruption among public servants in Nigeria. It may be safe to predict that if motivation is increased, the rate of corruption among public servants in Nigeria will decrease. Also if corruption is found to be detrimental to the sustenance of the private sector in Nigeria, it may be safe to predict that the prevalence of corruption will lead to low inflow of direct foreign investment in Nigeria.

c. Explanatory corruption research: This involves researches that are focused on the explanation of the phenomenon of corruption. It goes beyond description to explain the various ramifications of the phenomenon of corruption. Corruption like some other social conducts is complex. Therefore, there is the need to engage in diligent rigorous research activities to be able to unravel this complexity and difficult phenomenon. For instance, corruption research will provide answers to so many questions like: what are the causes of corruption, which category or class of people commit corruption most, what type of corruption is mostly practiced in Nigeria, who are the major perpetrators of corruption in Nigeria, Why does corruption flourish so much in Nigeria? These are pertinent questions that answers could be found through explanatory research.

d. Evaluative corruption research: This is the use of research to assess and examine existing or past situations like present or past manifestations of corruption or the performance of existing programmes, the implementation of new programmes and the planning and performance of interventions. It can also be used for the planning of future interventions. For instance, such research can be carried out to determine the effectiveness of anti-corruption measures in Nigeria, like the performance of anti-corruption agencies-Independent Corrupt Practices Commission (ICPC) or the Economic and Financial Crimes Commission (EFCC).

Chapter   **3.2.0.   Research Ethics in Corruption Prevention**
           3.2.1.   Introduction
           3.2.2.   Research Integrity
           3.2.3.   Ethical board approval
           3.2.4.   Voluntary participation
           3.2.5.   Anonymity and Confidentiality
           3.2.6.   Permission to research-informed consent
           3.2.7.   Plagiarism

Objectives
- Students are expected to have a good understanding of research integrity and plagiarism.
- They will appreciate the need to obtain the necessary approvals before embarking on a research activity.

- To enable students understand the need to get the confidence of the research subjects in any research activity.
- To make students know that anonymity and confidentiality of data are important plank of a research.
- To make students to realise that participation in research is not by coercion.

ACTIVITY
Students should divide into groups and practically demonstrate the various ways to apply the identified ethical principles using a typical questionnaire instrument.

ASSESSMENT
Students should outline and examine the various ethical principles of corruption research.

3.2.1.   Introduction

Every field of human endeavour have ethical standards that guide the activities of practitioners. Research is a very systematic activity which is carried out according to laid down principles. Therefore, there is the need to ensure that these tenets are adhered to in other to arrive at acceptable findings and conclusions. Unlike the natural sciences, the subject matter of corruption research is the human individual who are sometimes abused and violated in the course of research. Therefore, it is important to put in place rules that will protect and guarantee the rights of the human subjects in research.

3.2.2.   Research Integrity

The researcher is expected to maintain a high level of personal and professional integrity throughout the duration of the research. Research integrity requires that the researcher conforms to all the standard practice of a research endeavour. For instance the researcher is expected to actually obtain the data from the field, report the data collected without falsification and analyse the results with utmost objectivity.

3.2.3.   Ethical Board Approval

Research proposals involving human subjects require that the researcher obtains the approval of an ethical board which ensures that the subject's rights and interests are protected. In other to ensure compliance to this provision which has become part of legislation in some countries, most academic institutions establish an Institutional Review Board (IRB), a panel of faculty which perform this responsibility. However, some social research studies are exempt from IRB review, (Babbie 2010). For instance, an anonymous survey sent to a large sample of respondents which does not affect the rights of the respondents; or a research conducted in an established educational setting involving normal educational practices.

3.2.4.   Voluntary Participation

A major tenet of social research ethics is that subject's participation must be voluntary. Social research often involve the time and energy of the respondents. It also in some cases involves their

privacy and information they cannot share with people. Therefore it is important that they accept on their self-volition to be part of a research. Indeed any data collected by coercion has been rendered invalid and cannot be used for and research analysis. At any point in a research, the subject is at liberty to terminate the participation.

3.2.5.   Anonymity and Confidentiality

A major concern in the protection of the interest of the research subject is the protection of their identity and the information received. The anonymity of a research subject is guaranteed when the researcher and anybody who reads the data cannot identify a given response to a particular respondent, Babbie (2010). To ensure compliance to this tenet, anything that can identify the respondent like names, personal markers are removed from the research instruments and replaced with numbers or figures.

It is further required that any information collected in the course of a research should only be used for the purpose of the research and should not be divulged to any other person or put to any other use. The guarantee of anonymity and confidentiality is also made known to the respondents before the start of any research.

3.2.6.   Permission to Participate in the Research- Informed Consent

The researcher is expected to obtain the permission of the respondent before the respondent participates in a research activity. The request for this permission is often contained in the letter of introduction of the research instrument, either a questionnaire or an interview schedule. Sometimes it is obtained first by a front desk officer before the administration of the instrument. In other cases, researchers are required to obtain an informed consent from the subject. In this case the informed consent form which accurately informs the subject about the nature of the research will be given to the subject to obtain a verbal or written consent to participate.

3.2.7.   Plagiarism

The research must be entirely that of the researcher. Students must avoid the temptation of copying and pasting another person's work. Plagiarism is the presentation of another person's research as if it is your own. According to the University of Sussex, plagiarism is the use without acknowledgement of the intellectual work of other people (Hellman 2014). This principle is also against the copying or phrases without acknowledgement of the source.

Chapter   3.3.0. Data Collection for Corruption Prevention Research

3.3.1. Introduction
3.3.2. Basic concepts in data collection
3.3.3. Quantitative approaches in corruption prevention research
3.3.4. Qualitative approaches in corruption prevention research

Objectives

- The students are expected to understand the basic concepts in data collection.
- They will also have a good understanding of the quantitative approaches in corruption prevention research.
- They are also expected to be familiar with the qualitative approaches in corruption prevention research.
- They should be able to undertake data collection exercise in corruption prevention in any selected sector.

Activity

The students will be required to design and practically apply both the quantitative and qualitative data collection methods using a topic from their agency.

3.3.1. Introduction

The actual information that a researcher collects from the field of research is known as data. It is through data that research turns out possible outcomes that are used to explain or predict a phenomenon. The purpose of any research is to generate accurate and sufficient data with which to provide answers to the research questions and to test the hypotheses. A good knowledge of data collection methods is therefore very relevant for corruption prevention research.

3.3.2. Basic Concepts in Data Collection for Corruption Prevention

- **Research Population**:

The research population is the aggregate list of individuals that can be part of a research project. They comprise the population of people that are being studied. The research population can be the population of the whole country, a state, a local government or a community. It can also be a category or group within a particular population; like public servants, the police, the judiciary or students. For instance a corruption study can be done which covers the whole country or which covers a region or combination of states. It can also cover a category within the population like corruption among males in Abuja.

- **General population and target population in research**:

The general population often represented with capital N, refers to the entire population of study. For instance, in a study about corruption in Nigeria, the general population N, is the population of Nigeria. However, the focus of the research/study may be corruption   among males, females or the youth. This segment of the population on which the research is centred is the target population. This is usually represented with the small letter 'n'. Therefore, the target population is that population which is the centre of the study.

- **Sampling**:

Sampling according to Babbie (2010), is any procedure for selecting units of observation in a research. However, sampling generally is the practice of selecting a smaller unit from a larger population on which the research activity is based. Students can adopt simple random method or systematic sampling method to draw a sample for studies involving statistical or mathematical computation. They can also adopt purposive, availability or quota sampling for studies that does not require statistical or mathematical computation. The concept of sampling in social research has

made it possible for researchers to study large populations. There are two main types of sampling, probability and non-probability sampling.

- **Quantitative research method**:

This method emphasize objective measurements and the statistical, mathematical or numerical analysis of data collected through polls, surveys and questionnaires. It is the systematic, empirical investigation of observable phenomenon with the use of statistical, mathematical or computational techniques. Indeed, quantitative data is any data that is in numerical form, such as statistics, percentages, ratios, proportions etc.

- **Qualitative research method**:

The qualitative method is the investigation and examination of observable phenomena using non statistical, mathematical or computational techniques. Qualitative method basically involves data in the form of words, pictures descriptions or narratives. Major qualitative methods according to Obikeze (1990) are participant observation, in-depth interviews, Focus Group Discussion, (FGD) and secondary or documentary sources.

3.3.3. Quantitative Approaches in Corruption Prevention Research

According to United Nations Office for Drug and Crime (UNODC, 2009), the use of statistical methods to describe and qualify corruption poses a number of methodological challenges. A reliable approach to overcome this challenge is assessments of corruption based on representative sample surveys of a given population. These could be households, business, private sector, public sector, institutional or population categories. Through the use of sample surveys, direct collection of data on corruption experience could be conducted. Sample survey also allows for the full investigation of several aspects of corruption activity, with the benefit to better understand modalities, purposes and actors involved. A survey is a research design in which a larger population is studied using a small portion called sample which is selected systematically, with the view that the result from the study will apply to the larger population.

According to UNODC (2009), sample survey when conducted in a methodologically sound manner can provide answers to vital questions like:
- What portion or percentage of individuals had to pay a bribe in a given year
- What are the characteristics of victims and perpetrators of corruption
- What is the level of corruption over a period of time
- Are there certain population groups more at risk of being victims of corruption-vulnerability studies
- What are the sectors/regions most affected by corruption
- How much corruption is reported to competent authorities and factors affecting decision to report
- What amounts are paid, when, how and by whom, in a corruption process
- What sectors are more at risk of corruption

There are various types of corruption surveys which target different groups with different roles and experience of corruption like:
- Surveys of individuals/households

- Surveys of the private/business sector
- Surveys of the public/civil sector
- Surveys of specific sectors; banks, industries, police, judiciary etc.

Household Surveys: In household surveys, sample survey, respondents are asked about their experience of corruption as victims or even perpetrators. Different aspects of corruption episode can be fully investigated with the view to better understand the relationship between public officials, services provided and private citizens. In addition to an understanding of the prevalence of corruption, it is possible to also explore how corruption takes place, for what purpose, in what sectors and for which operations. Survey results allow for setting baseline data for monitoring and evaluation, assisting in identifying corrective measures and determining the success rate of tailored interventions.

Business/Private Sector Surveys: Sample surveys can also be conducted in the private/business sector. In this case, respondents could be executives of sample of enterprises or workers. A range of topics can be investigated, from experiences, to opinions and perceptions. The aim of these surveys among others is to measure the frequency and impact of corrupt practices among the private/business sector. Such measurement is relevant because corruption is among the crimes most frequently affecting successful economic development of the Country. There are existing international business surveys like the International Crime against Business Surveys (ICCBS and the Crime and Corruption Business Surveys (CCBS), (UNODC, 20009).

Surveys of Civil/Public Sector: This is another type of sample survey which directly targets public officials. These assessments and investigations are sometimes focussed on specific sectors like the police, judiciary, customs, political office holders. In most cases, these surveys have a broad focus and aim at collecting information on the working conditions of civil servants, with a view to identify weaknesses in work organization and environment and possible hot spots for corrupt practices. It may also aim at understanding the experience and perceptions of respondents on recruitment, promotions, job mobility, work incentives, satisfaction with salary and career. Finally, information on corruption experiences and perception provide crucial data for elaborate policy measures (UNODC 2009).

3.3.4. Questionnaire Method

The questionnaire is the major instrument for data collection in survey research. A questionnaire is a data collection technique in which information is gathered from individual called respondents by having them respond to questions with options. They are flexible and versatile tools that can be used for several types of research. They are usually used for obtaining data representative of a population too large to be studied by other methods (Monette, Sullivan & Dejong, 1998). In most survey studies, the survey method is combined with other methods like the interview method in a process called mixed technique to derive quality data.

In the questionnaire method, the researcher constructs sets of questions based on the hypothesis, the research questions and the research objectives, with possible options which the respondent is required to fill inside the questionnaire form. A questionnaire item may be closed or open ended. If it is closed it means all the possible options are stated, but if it is open ended it means the respondent is given the opportunity to state the response. Closed ended questionnaire is mostly used because it is easier to compute and analyse.

A questionnaire may be self-administered. In this case, the researcher gives the questionnaire form to the respondent to fill and he either collects it immediately or come back later. It can also be other administered in which case the researcher or the assistants in a face to face encounter with the respondent, reads out the questions and the corresponding options and fills in the choice of the respondent. The questionnaire can also be administered through the telephone. The researcher makes contact with the respondent on phone, reads out the questions and options, then fill in the responses. It can also be delivered by mail through the respondent's mail box.

3.3.5. Qualitative Methods of Corruption Prevention Research

The decision of whether a research is quantitative or qualitative depends on the subject of study and the method of data collection applied in the study. Also, the method of data collection determines the method of analysis that will be used. Qualitative method could be used as the primary tool for data collection. Qualitative method can also be used as a complement to the quantitative methods to obtain in-depth information that helps clarify key concepts and variables. The Qualitative method can be used as prime research instrument when the subject matter has to do with sensitive issues, complex situations or informal relations. In corruption prevention research, the qualitative method can be used to identify the existence of corruption in a sector. It can also be used to identify perpetrators and victims of corruption. It can further serve as a tool to help collect good quality information about corruption within targeted sectors, analyse it and translate it into effective programs to initiate or improve the effectiveness of corruption prevention programs which can support the development of well-designed corruption prevention components within relevant sectors. The major qualitative techniques are discussed below.

3.3.5.1.   Observational Method

According to Monette, Sullivan& Dejong (1998), the observational method is the collection of data through direct visual or auditory experience of the behaviour and actions of the target of observation. The researcher actually sees, hears and records the behaviour or words of the research subject, which are later analysed. Observation is difficult, tricky and can be faulty, but it is at the core of both scientific investigation and human service practice. Research observations differ along three dimensions; are the data collected quantitative or qualitative, are the observations done in a naturalistic real life setting or in a contrived setting, to what extend does the investigator participate in the activities of the people being observed. Observational method is very relevant for data collection in corruption research.

There are various types of observation, participant observation, non-participant observation, obtrusive observation, non-obtrusive, disguised observation and physical tracing (Monette, Sullivan & Dejong, 1998).

- **Participant Observation:**
This is an observational method in which the researcher is a part of the people, group or situation that is being studied (Babbie 2010). It is naturalistic and demands that the investigator participates and observes at the same time. In some cases, the researcher may belong to the group prior to the start of the research and then use his position as a group member to collect data. In other cases, a researcher must first gain access to a group unknown to the group in order to be a participant

observer. This method is very relevant in the study and investigation of corrupt practices especially on the spot when it is happening. For instance a researcher can be sent to a police formation as a police officer just to investigate and study the rationalization and practice of corruption among the personnel. This method is also suitable for qualitative data.

- **Non participant Observation:**

This is the method in which the researcher studies a social process without becoming a part of it. The subjects may not be aware that they are being studied since the researcher is not directly involved in the process. For instance in other to study bus drivers and bribery among police and traffic warders in Abuja, the researcher can map out relevant routes in Abuja and enter different buses as a passenger for days, weeks and months in other to observe the practice and gather data.

- **Obtrusive Observation:**

This is the type of observation in which the researcher has a direct contact with the subjects he is studying while conducting the observation. This is close to participant observation, but obtrusive observation is different in the sense that the subject of study may be aware of the presence of the observer. For instance a team of researchers or a researcher may spend some time in a public sector and embark on a study or investigation of corruption in the sector.

- **Non obtrusive Observation:**

This is a system of observation in which the observer has no direct contact with those being observed. Those under study are not aware that they are being studied. This is because the intrusive impact of an outsider might change the behaviour of group members in ways detrimental to the research. It could take the form of hidden observation, disguised observation and physical traces. It can be done in a natural or contrived setting and can involve both quantitative and qualitative observation.

- **Hidden Observation:**

Hidden observation can be carried out through a one way mirror or by videotaping the activity with a hidden video camera or making use of mounted cameras to observe all the activity in the location. For instance video camera can be mounted within the premises of an establishment to monitor the behaviour of the workers. Similar instruments can be used to observe the corrupt practices of the workforce.

- **Physical traces:**

Physical Traces are the physical objects or evidence that results from people's activities that can be used as data to test hypothesis. It is commonly used in police investigations like finger prints, tyre tracks, dirt stains and blood stains.

- **Disguised Observation:**

This refers to observing people in a naturalistic setting without participating and without revealing that one is observing them. For instance a researcher may disguise as a customer who needs an international passport to study corruption and passport racketeering among Immigration officers in Abuja.

3.3.5.2. Interview Method

The interview is a method of data collection in which the researcher methodologically derive sets of questions called interview schedule from the research questions and hypothesis and reads the questions directly or through research assistants to the respondents and records their responses. Interviews are generally qualitative data instruments and are used as complementary tools for survey studies. Interview schedules can have differing levels of structure which determine the flexibility. The element of structure refers to the degree of freedom the interviewer has in conducting the interview and which the respondents have in answering the questions. There are three levels of structure in an interview:

- **Un-standardized interviews:**
The interviewer in this case, only works with a general topic as a guide, and develops his or her own questions and probes as the interview progresses. The questions are not very structured. This is good for exploratory research.

- **Non-schedule standardized interviews:**
This interview type adds more structure to the questions. The topic is the same and specific questions are asked to all respondents. The interview remains fairly conversational and the interviewer is free to probe and rephrase questions or takes the questions in whatever order that fits the particular interview.

- **Schedule standardized interviews**:
This is the most structured type of interview. The interview schedule contain specific instructions for the interviewer. It also contain specific questions in a fixed order and transition phrases for the interviewer to use. This approach is fairly rigid with both the interviewer and respondent expected to stick to the structure of the schedule. This is the most preferred for studies with large sample size.
- **In-Depth Interview (IDI) and Key Informant Interview (KII):**
In-depth interview contain specific questions for all the respondents and are fairly structured. On the other hand, key informant interview are restricted only to selected members of the respondents who have privileged knowledge about the subject of study and are expected to provide insightful information.

Chapter   3.4.0.   An Outline of Normal Research Activity on Corruption Prevention
                      3.4.1.   Introduction
                      3.4.2.   The Problem Formulation Stage
                      3.4.3.   The Design Stage
                      3.4.4.   The Field/Data Collection Stage
                      3.4.5.   The Data Analysis Stage/Reporting

Objectives

The following objectives are mapped out for module 5:

- To emphasize the fact that the research process is a carefully planned activity
- To enable the students have a clear vision and outline of the research problem
- To enable students to effectively understand and make informed decision about detailed plan for a research project.
- The students will have a good knowledge on the best data collection tools and how best to get reliable data from the field.
- The students will know the best way to collate, analyse and report research data.

3.4.1. Introduction

It is important at this stage to look at the process and stages of carrying out normal research activity on corruption. Social research follows a set of procedures which is known as the scientific process which consists of a number of stages which are interrelated. This process is linked such that what goes on in one stage of the process affects the next stage. Therefore, the researcher should keep in view the requirements and implications of the various stages in the process.

3.4.2. The Problem Formulation Stage

Every research endeavour is driven by a perceived or real problem that needs to be addressed. This is the first stage in the research process and the researcher is expected to clearly spell out what the study is all about. Some problems though intriguing and interesting may prove difficult and pose methodological, ethical and financial challenges. A number of distinct but related activities are involved at this stage (Obikeze 1990).

- **Choice of Research Topic:**
The researcher must couch a researchable topic to drive the research. The topic must be clear, precise and unambiguous. For instance a global and national concern on corruption may lead to the topic, the state of corruption in Nigeria. This topic could be good for an essay, but may be too broad and imprecise for a research topic. The topic needs to be narrowed down to more specific directional topic that can allow the gathering of empirical data. For instance the topic could be 'the level of corrupt practices among Nigeria police officials in Abuja'. The topic is now narrower, precise and has a direction.

- **Clear Statement of the Problem:**
The researcher has to clearly state the problem he intends to study. This stage begins with stating the background to the research problem. It is important to further highlight both the seriousness of the problem and the ramifications within the context. How is the problem affecting the people and society, why is the subject worth studying, what research gap does the study intend to fill, what

are the justifications for the study. For instance what is the background facts about corruption in Nigeria and specifically the police, what is the seriousness and ramification of corruption among the police in Abuja and Nigeria, what are the possible effects of the problem of corruption in Abuja and Nigeria etc, include official documents, statistics to buttress the point.

- **Formulation of Research Questions:**

The researcher needs to reduce the problems highlighted above to researchable questions. It is expected that these questions will direct and determine the nature of the data collection methods. It will form the basis of the questionnaire items and the interview schedules. For instance, what is the level of awareness of corruption among the police in Abuja; what is the extent of police corruption in Abuja, Who are the most victims of police corruption in Abuja. How does police corruption in Abuja take place, what are the causes of police corruption in Abuja, etc.

- **Specification of the Objectives of the Research:**

The researcher should also state the research objectives. The objectives necessarily derive from the research questions. They are also very important because the objectives set out the focus and direction of the research. The research objectives could be general and specific. For instance the general objectives of the above topic could be: to investigate the level of police corruption among police officials in Abuja, the specific objectives could be; to know the level of awareness of corruption among the police in Abuja, to know the extent of police corruption in Abuja, to find out the most victims of police corruption in Abuja etc.

- **Outlining the Significance and Anticipated Contributions of the Research:**

The researcher should indicate the anticipated contributions of the research, These contributions could be theoretical and practical. Does it contribute to existing social theory and literature in corruption research and criminology? Practically, how does the study contribute to the fight against corruption in Nigeria? Is it expected to contribute to the efforts to reorganize the Nigeria police for effective performance? etc.

- **A Review of the Related Literature:**

The researcher needs to read and present what others have said about the concept and topic. What conceptual and perspectives issues exists on the concept and topic. What theories address the issue, what previous research exists, are there consistent or divergent findings, are their flaws in existing research that you think this research can remedy? etc. (Babbie 2010) For instance in a research on corruption prevention, the rational choice theory can be adopted as the theoretical framework. Wilson (1975) in Siegel (2013) posited that criminals are rational actors who plan their crimes, fear punishment and deserve to be penalized for their misdeeds. He argued that efforts should be made to reduce criminal opportunity like in corruption by deterring would be offenders and incarcerating known criminals/offenders.

3.4.3. The Design Stage

In this stage, the researcher lays out a comprehensive plan, a blue print showing how the researcher intends to go about solving the already identified research problems. What research design to be adopted, survey or experimental. This is the stage when the researcher sets out on an outline on who the research subjects are, their population, where they are, how to contact them, by whom when, what information to elicit from them, how to get this information etc.(Obikeze 1990). The researcher is expected to indicate the following:

Specification of the key variables: The key variables are the operationally testable concepts in the study. Variables are events that are capable of taking on more than one value. Variables in research are stated in such a way that one would be the cause or the effect of the other. The one who is the cause is called the independent variable while the one that is the effect is called the dependent variable. In this study, the key variables are corrupt practices, police officials.

- **Formulation of Research Hypotheses:**

Hypotheses are researchable problems that are presented as testable statements which states presumed relationship between two or more variables. In the construction of hypotheses, the relationship between variables are stated either in a positive, negative or inverse relationships. A hypothesis is made up of the independent and dependent variables. The independent variable is usually stated first followed by the dependent variable in a causal relationship.

The independent variable is the active or causal variable which produces change in the dependent variable while the dependent variable is the passive one that is affected. For instance in this study, the possible hypotheses could be, the nature of Abuja as the capital city gives rise to high level of police corruption or there is a significant positive relationship between the nature of Abuja as the capital city and high level of police corruption. In this case, the independent variable is the nature of Abuja and the dependent variable is high level of police corruption. Another could be, police officers who have low motivation are more likely to engage in corrupt practices than those who have high motivation. In this case, the independent variable is low motivation and the dependent variable is corrupt practices.

Identification of Study Population: The researcher should identify whom and what will be studied, from whom will the data be collected. For this study, the target population are the people in Abuja who usually have regular interaction with the police, also the police officials in Abuja. It is important also to think about how to reach this population.

- **Determination of Sample and Sampling procedure:**

The researcher would have to determine whether to study the whole population or use a sample of the population. What is the sample frame if available? What is the sample size? This is determined using sampling fraction or other statistical formula. Also the sampling procedure should be determined, what sampling method would be used to select the sample, is it availability, simple or systematic sampling process etc.

- **Determination of the Research Instrument:**

It is important to also identify the data collection method that would be used to collect data, is it the questionnaire, interview, focus group discussion etc. The chosen instrument needs to be properly constructed in other to effectively provide answers to the research questions, hypotheses and meet the research objectives.

- **Specifying the Analytical Methods:**

The researcher should also indicate the analytical procedures that will be adopted in analyzing the data collected and testing the hypotheses. The researcher may chose to use statistical tables, frequency, charts, graphs to present and analyse the data.

- **The Field Stage/Data collection:**

The researcher may need to pre-test the instrument or carry out a pilot study in which the instrument is first tested before proceeding to the actual field. At this stage, the researcher goes

with the designed instruments to the field to collect the required information. In most cases the research instruments are combined where necessary to get the best required information from the respondents. For instance in sample surveys, the questionnaire is combined with the interview instruments, But if it is a qualitative research, purely qualitative methods will be used.

- **Data Analyzing Stage/Reporting:**

At this stage, the data are collated, organized and presented in such a way as to provide answers to the research issues. The researcher may use appropriate computer methods to run the study analysis. Data analysis is the process through which information and observation made during the research is giving meaning. Data analysis can be qualitative or quantitative.

Quantitative data analysis: In quantitative data analysis, observations are put into numerical form and processed according to their arithmetic properties. Analysis of quantitative data involves the use of statistics and numericals as procedures for assembling, classifying, tabulating and summarizing data so that some meaning and conclusions can be reached. According to Obikeze (1990), there are certain elements of the quantitative analysis that should be explained.
1. The data are numerical in form or quantified through the process of coding.
2. The important variables are clearly identified and are specifiable with regards to types and levels of measurement. It should be possible to distinguish among the dependent and independent variables.
3. The data are presented in the form of statistical tables and illustrated with the aid of graphs and charts.
4. The description and explanation of data are carried out through the application of appropriate statistics.

There should be a compilation of simple frequency distributions or summaries for all the variables. This provides a quick overview of the response pattern which helps the research to assess the relative importance of variables for explaining relationship trends. The methods normally employed in summarizing and describing both background and key study variables are simple frequency distribution and descriptive statistics.

This includes the categorization of the preliminary information like the socio demographic data or other preliminary information (Obikeze, 1990).

The next stage is the thematic analysis of data. At this stage, the researcher tries to find answers to the various research questions and test specific research hypothesis. The outcome of operations at this stage determines the extent to which the research objectives have been achieved. The researcher needs to ensure smooth flow and sequential ordering of the research report.

A summary of the research analysis and reporting begins with making a list of all the relevant research issues, research problems and research objectives. These research issues/elements are ordered according to some defined sequence of based on themes, Objective or questions. Then the construction of frequency distribution tables for each item in the instrument. The next is the description of the tables using appropriate statistics and graphic presentations. Identifying trends, variations, relationships or any peculiar features of the data using appropriate statistics. Also, testing explicit hypotheses on the issues using appropriate statistics. Finally, making the necessary decisions, generalizations and interpretations of results using theory, other studies and specifying the implications of the research findings.

Qualitative data analysis: In the analysis of qualitative research, the first stage is to develop an analysis plan which is carried out during the research design. The purpose of the plan is to clearly spell out the strategy for targeting specific structural goals that necessitates the collection of particular forms of qualitative data. Data analysis in qualitative research begins with the inception of field work and both function simultaneously.

Qualitative data from the field must first go through data cleaning and be transcribed into a more readable and understandable format. Then it could be translated into the English language if the instrument administration is carried out in the local language. Then the data is collated, interpreted and reported according to relevant themes and subjects on the basis of the research questions, the research propositions and the research objectives. Qualitative research is mostly evidence based, so the researcher must ensure that relevant evidence either in the form of pictures, images, direct quotations and extracts from the respondents in the field are inserted in the report to justify or buttress an analytical position. The major aim at this stage is to identify the research findings which are clearly indicated. Based on the findings, appropriate recommendations will be proffered that can form policy and provide solutions to the identified problems.

ACTIVITY
The students are expected to formulate a research topic using their sector and design an outline that will be used to conduct a research activity in the area.

ASSESSMENT
In a normal research outline, explain the second stage in the process using your sector as an example.

MODULE 4:0   **CORRUPTION RISK ASSESSMENT STUDIES**

Overview
The resolution of the Conference of State Parties (COSP) to the United Nations Convention against Corruption (UNCAC) at its third session, held in Doha from 9 to 13 November 2009, goes to highlight the importance of the inclusion of this module in the curriculum. The Conference adopted resolution 3/2 on measures to prevent corruption. Most importantly, the Conference further requested the United Nations Office on Drugs and Crime (UNODC) to collect and disseminate information on methodologies, including evidence-based approaches for assessing areas of special vulnerability in the public and private sectors that are potentially or recurrently prone to corruption (UNCAC Treaty Series, vol. 2349, No. 42146).

Every organization faces one form of threat or the other. The extent to which an organization is able to achieve its mission will depend to some extent upon factors and forces from both within and outside the organization. These drivers impact the organization and its stakeholders constantly. All organizations do not possess the same proclivity toward corruption. Based on different patterns of development and political economic dynamics, organizations manifest differing corruption tendencies and vulnerabilities, resulting in different types of corruption risks. For instance, an organization dealing with construction of large hydro power plant for the country is likely to face corruption risks different from a consultancy firm handling a recruitment activity for a commercial bank. Also, a small retail provision store would have yet different kinds of risks compared to the two above. So also, an organization operating in one country would face different kinds of risks from another one in same line of business but located in another country. The implication of this is that to be able to effectively prevent corruption at the organizational level, we need to understand the environment, nature, magnitude and impact of corruption on the organization. This is what Corruption Risk Assessment is all about.

General objective
At the end of topic 4, participants are expected to be able to:
- identify corruption schemes
- analyse various corruption risk factors
- calculate inherent risks from corruption schemes
- develop a corruption risk scorecard
- prioritize corruption risks
- assess the likelihood of occurrence and impact of corruption on an organization
- design corruption risk mitigation/integrity plan
- advise management on policies to prevent corruption in the organization
- monitor compliance.

4.1.0.   General Overview of Organizational Risks

Instructional procedure:
4.1.1. Introduction
4.1.2. Definition and identification of different kinds of risks in organizations
4.1.3. Goals of risk management
4.1.4. The challenge for risk assessors

Learning Objectives:
At the end of this chapter, participants are expected to be able to:
- ▪ define risk
- ▪ identify the various types of organizational risks
- ▪ describe the general goals of organizational risk management
- ▪ differentiate a corruption risk from other risks within the organization
- ▪ familiarize with the concepts of Probability and Impact of corruption risks.

Overview
This chapter captures the general concept of risks. It consists of four major parts beginning with introduction. The second part focuses on the description and identification of the various types of risks an organization faces in the course of the day-to-day operations. The third part deals with the goals to be achieved by the risk management systems. Lastly, it takes a general look at the real challenges before the risk assessor in determining the probability (likelihood) and impact (consequences) of each risk factor on the organization if materialized.

4.1.1. Introduction

Corruption like most social and societal problems can be measured using appropriate tools such as gauging people's perception on its prevalence, bribe paying, good governance measurement, etc. But measuring the degree to which an organization is susceptible to corruption and the extent to which that can impede on its ability to achieve its set objectives is the focus of corruption risk assessment. Therefore, to be able to prevent corruption in an organization, it is necessary to first understand the nature of corruption risks that the organization faces in the course of its day-to-day operations.

4.1.2 Definition and Identification of Different Kinds of Risks in an Organization

- **Hazard** is something that can cause harm, e.g. electricity, chemicals, working up a ladder, noise, a keyboard, a bully at work, stress, etc.

- **Threat** is synonymous with hazard, menace, peril, pitfall, risk, danger, trouble (Merriam-Webster, 2017).

- **Risk** is the chance, high or low, that any hazard will actually cause a harm.

- **Organizational Risk** is defined as the possibility that an event will occur, which will impact an organization's achievement of objectives (The Professional Practices Framework, 2004). It is an event in the future that if it materializes will bring about

negative consequences and will stop the achievement of a goal. Every organization faces many forms of risks on daily basis.

- **Corruption Risk** is expressed as a factor of the likelihood of corruption multiplied by the impact of corruption; objective risks (weak institutions and regulations) are differentiated from subjective risks (tolerance to corruption, personal motivation, weighing up of costs/benefits, past experiences); corruption risk is understood as a factor of the level of transparency and level of fairness in a process; corruption risk is understood as the difference between actual and ideal systems. Corruption risk therefore refers to a weakness in the system and not a definite occurrence of corruption.

- **Inherent Risk** is the level of risk in place in order to achieve an organization's objectives and before actions are taken to alter the risk's impact or likelihood.

- **Residual Risk** is the remaining level of risk following the development and implementation of the entity's response.

- **Control** is any activity which mitigates or reduces risk, but typically it involves an additional activity to ensure that a process occurs as it should. Cost vs benefit is always considered in the establishment of controls.

- **Types of Organizational Risks**
  There are many forms of risk in an organization. Risks are categorized by nature, magnitude, environment, etc. to include security risk, personnel risk, internal risks, external risks, compliance risks, reputational risks, etc. To address risks more effectively, organizations may use a risk management approach that identifies, assesses, manages, and controls potential events or situations.

- **Risk Tolerance**
  Risk Tolerance refers to the maximum amount of risk that an organization can bear in spite of available controls. Risk tolerance is often expressed in quantitative terms (could be a percentage of net profits on a particular project or penalty for non-compliance) expressed in acceptable/unacceptable outcomes or levels of risk.
  To address risks more effectively, organizations may use a risk management approach that identifies, assesses, manages, and controls potential events or situations. Corruption risk therefore, refers to a weakness in the system and not a definite occurrence of corruption.

- **Risk Appetite**
  The level of risk that an organization is prepared to accept in pursuit of its objectives, and before action is deemed necessary to reduce the risk. It represents a balance between the potential benefits of innovation and the threats that change inevitably brings. The ISO 31000 risk management standard refers to risk appetite as the "Amount and type of risk that an organization is prepared to pursue, retain or take". In a literal sense, defining your appetite means defining how "hungry" you are for risk.

Assessment Question	- Mention the different sources of corruption risk. - Describe the circumstance in which an organization would have appetite for risk. - Differentiate between Risk Appetite and Risk Tolerance. - Why is control important? - Differentiate between inherent and residual risks.
	https://www.youtube.com/watch?v=CRHac4QTEio

Organization's day-to-day operations have economic, politial, institutional, reputational, social stability and security consequences. Therefore, the organization should have a portfolio of assets and liabilities with which to balance the above factors to enable it achieve its goal. The risks associated with the management of these organizational assets and liabilities is the major concern of the risk assessor. Therefore, the main goal of effective risk management is to ensure that each risk is identified, documented, prioritized, and mitigated where and whenever possible.

Among others, the main goal of effective risk management is to ensure that each risk is identified, documented, prioritized, and mitigated whenever possible. Because all organizations face one form of occurrence or the other. When it is positive it becomes opportunities but negative (i.e., events that hinders organization's objectives) becomes a risk or hazard.

4.1.3 The Challenge for Risk Assessors

The major challenge for Risk Assessors is to know when risk will occur and the impact it will have on the organization. Risk assessors need to consider the probability that the risk will occur. For example, it may not be necessary for the organization to worry about a particular risk when the likelihood that it will occur is significantly low and its impact is low as well. However, organizations should concentrate on low-probability risks that will have a high-negative impact. As a result, looking at the impact and probability of each risk is important when establishing an effective risk management program that addresses organizational risk. This is important because the organization needs to order its priorities for reasons of economy, urgency, peculiarity, etc.

Class Activity	**Fill each bracket with a life example from your locality**
	1. **Corruption risk factor** e.g. A local business climate (………)
	2. **Corruption risk** e.g. Bribery of a government official to secure, retain or influence an improper business decision (……………………………)
	3. **Corruption scheme** e.g.
	   a) Potential improper payments to (………………….) officials to facilitate process related (…………………………………………….) that are illegal.
	
	   b) Potential improper payments to (………………….) to secure the reduction or elimination of (……………) liabilities.
	
	   c) Potential improper payments to (……………..) officials to secure a desired piece of (………………) lease terms.

References	1. https://www.google.com.ng/?gfe_rd=cr&ei=g7FxWef0MKKp8weThaHACQ#q=Example+of+a+hazard
	2. https://www.merriam-webster.com/dictionary/threat
	3. https://en.oxforddictionaries.com/definition/vulnerability
	4. https://www.tn.gov/assets/entities/finance/accounts/attachments/
	5. https://www.unodc.org/documents/data-and-analysis/statistics/corruption/WG4_doc-4-FINAL.pdf
	6. (Conference of the States Parties to the United Nations Convention against Corruption, 8 October 2010, United Nations, Treaty Series, vol. 2349, No. 42146).

Chapter   4.2.0   Concept of Corruption Risk Assessment (CRA)

       4.2.1.   Introduction
       4.2.2.   The concept of corruption risk assessment
       4.2.3.   Purpose and context of corruption risk assessment
       4.2.4.   Assessment approaches

Learning Objectives
At the end of this chapter, participants are expected to be able to:
- define Corruption Risk.
- identify corruption red-flags, corruption schemes and corruption risk factors.
- describe corruption mitigation plan and explain the general goals of organizational risk management.
- understand the context within which corruption risk assessment is indispensable.
- differentiate a corruption risk from other risks within the organization.
- Distinguish between corruption risk and actual occurrence or prevalence of corruption.
- familiarize with the approaches to corruption risks assessment.

Overview
This chapter examines the general concept of corruption risk assessment. It consists of four major parts beginning with introduction. It examines the purpose and context for which corruption risk assessment becomes the norm rather than the exception. Lastly, the various approaches used in the conduct of corruption risk assessment is explained.

4.2.1.   Introduction

Corruption Risk Assessment (CRA) is a (diagnostic) tool which seeks to identify weaknesses within a system which may present opportunities for corruption to occur. It differs from many other corruption assessment tools in that it focuses on the potential for - rather than the perception, existence or extent of corruption.

4.2.2.   The Concept of Corruption Risk Assessment (CRA)

At the core of corruption risk assessment is a degree of evaluation of the likelihood of corruption occurring and/or the impact it would have should it occur (*Transparency International, 2011*). A

"red flag" is an indicator; something closely linked to the *risk*; it usually happens before the risk occurs. Sometimes "red flag" refers also to external signs of materialized corruption. It is a trigger. The difference in time between the occurrence of the trigger and the materialization of the risk allows us time to take preventive action such as designing a risk mitigation plan. A mitigation or integrity plan is a plan that, if carried out, would minimize the negative consequences from the occurrence of the risk.

4.2.3. Purpose and Context OF CRA

The purpose of a corruption risk assessment is usually to supplement evidence of actual or perceived corruption in a given context in order to inform anti-corruption strategies and policies or for action such as advocacy. It can also serve as a baseline for anti-corruption work to track risk trends over time. Corruption risk assessment can be applied at all levels from government institutions, to donor support programmes, down to sectoral programmes, as well as in individual organizations or units.

By conducting a corruption risk assessment at an early stage of a project, companies can take steps to manage corruption risks. Such an assessment will determine the level of corruption risk the project is likely to face, and identify any particularly challenging areas, such as at a specific stage of the business cycle or a particular aspect of a company's interaction with governments, bureaucracy or private-sector players. With this information, a company can implement measures to protect itself from exposure to corruption and prepare its employees to respond effectively and consistently if they encounter corruption. The organization can also use the information provided by the assessment to introduce measures such as anti-corruption policies, and training appropriate to the political and business environments in which the company will be operating (Control Risks Group Limited, 2011).

4.2.4. Assessment Approaches

As a general rule most corruption risk assessments take an institutional approach, i.e. they aim to identify weaknesses in (the enforcement of) rules and regulations in an organization, sector and/or process under analysis. Beyond this, however the conceptualization of risk varies from tool to tool, for example:
1. Corruption risk is equal to the set of institutional vulnerabilities within a system or process which might encourage or facilitate corrupt practices.
2. Measures of institutional vulnerability are combined with data on perceptions and/or experience of corruption as a proxy for corruption risk.
3. Risk is expressed as a factor of the likelihood of corruption and the impact of corruption.
4. Objective risks (weak institutions and regulations) are differentiated from subjective risks (tolerance to corruption, personal motivation).
5. Corruption risk is understood as a factor of the level of transparency and level of fairness in a process.
6. Corruption risk is understood as the difference between actual and ideal systems.

Thus the sophistication of risk assessments ranges from identification of corruption (or integrity) and/or institutional weaknesses/gaps as an indicator of risk of further corruption, to do an analysis of the impact and estimation of the likelihood of corrupt practices. Moving from the identification of risks to 'actionable' information, further stages in the assessment include prioritization of risks, identification of tools to address the identified risks, and guidance on the development of anti-

corruption strategies (although strictly speaking the latter stages are beyond the scope of a 'core' risk assessment). In many cases, the first stage serves to identify broad risk areas usually through secondary sources) which are then analyzed in more detail in the second stage. In some cases, intermediate steps in the analysis are left out, such as the assessment of impact and likelihood of corrupt practices. In other cases, the analysis stops at the risk identification stage, or even at the point of identifying 'institutional weaknesses.

It is worth noting that the different elements of a risk assessment identified above may be more or less appropriate for different levels of analysis. The results of a risk assessment can be presented in a number of ways. In some cases, risks are visualized through (1) a corruption risk map which highlights key stages, actors and/or relationships in the process under analysis. (2) A visual tool known as corruption risk matrix which is often used to prioritize risks. More often than not however, results are either presented in tabular form or as checklist.

Assessment Questions	• How is Corruption Risk Assessment of benefit to an organization? • At what stage of a project is the conduct of corruption risk assessment most relevant? • Differentiate subjective risk from objective risk. • Explain the various ways a result of a corruption risk assessment can be presented.
Reference	1. Ayotola Jagun (2015), Identifying Corruption Risk Factors and Schemes: Anti-Corruption Risk Assessment for Companies Seeking to Invest in Africa. 2. Assessing Corruption Risks, Control Risks Group Limited, 2011. 3. http://transparency.dk/wpcontent/uploads/2015/12/20151101-Identifying-Corruption-Risk-Factors-and-Schemes-TI-Denmark.pdf 4. http://www.spaajibade.com/resources/executive-summary-of-anti-corrupt-legislations-with-a-view-to-advising-foreign-investors-in-nigeria-on-anti-corruption-programmes/ 5. Tools for Assessing Corruption & Integrity in Institutions - A Handbook, USAID, 2005.

Chapter 4.3.0. Corruption Risks Identification and Rating

      4.3.1. Introduction
      4.3.2. Environmental level
      4.3.3. Organizational level
      4.3.4. Personal level
      4.3.5. Corruption risk assessment instruments
      4.3.6. Identification of assets and liabilities of an organization

Learning Objectives:
At the end of this chapter, participants are expected to be able to:
▪   determine if a particular corruption risk is driven by external or internal events.
▪   familiarize with the various levels in which corruption can exist.

- describe the various factors that facilitates corruption within the external environment of the organization.
- identify corruption-inducing factors within the organization.
- familiarize with the various tools and methodology for CRA data gathering.
- identify the assets, liabilities and risks of an organization.

Overview

This chapter deals with the identification and rating of corruption risk in the organization. It consists of six main parts beginning with an introduction. Sections two to four analyse corruption risk factors at the environmental, organizational and personal levels. Section five examines the instruments and methodology for CRA data collection. Lastly, the techniques for the identification of organizational assets, liabilities and risks is explained in the context of corruption risk assessment.

4.3.1. Introduction

It is necessary to first understand the nature of risk and to determine whether the risk is driven by internal or external events. It is important to establish the exact sequence of events leading to a risk. This could result in the identification of intermediate intervention points where risks can be prevented or limited.

To be able to identify corruption risks therefore, an assessor must be familiar with the different levels at which corruption risks can exist. These are Environmental, Organizational and Personal levels. Each of these can be looked at in greater details below.

4.3.2. Environmental Level

The extent to which an organization is able to achieve its mission will depend to a large extent, on trends and forces from the outside. Threats at the environmental level are external factors that are beyond the immediate control of the organization but with potential to place the organization at risk. These external drivers impact the organization and its stakeholders constantly. One of the primary and ever-present threat at the environment level is 'competition.' In the field of corruption, other threats include government regulation, economic downturns, negative press coverage, leap-frog technology that leaves a systems or services obsolete, etc. These factors pose serious threats to the survival of any organization but the organization has no control over them. Therefore, to be able to properly identify and isolate corruption risk in the organization, an environmental analysis is key.

Environmental Analysis

Environmental analysis seeks to identify trends and events with risk potentials within the environment external to the organization. There are several tools available for use, e.g. the Hazard and Operability (HAZOP), Strength, Weaknesses, Opportunities and Threats (SWOT), etc. but the commonest and effective one is the Political, Economic, Socio-cultural, Technological, Legal and Ecological (PESTLE).

- **Political**

  Political factor plays a critical role in shaping the ethical and integrity climate of any nation. 'Political will' of the decision-maker is required to achieve organizational, sectoral or national policies and strategies on anti-corruption. The needed changes in regulation that are possible, impact of such changes on organizations' ability to check corruption, national or sectoral policies that are being developed that might affect strategy development, political or government stability risks, etc. are all political issues with implications on corruption risks.

- **Economic**

  These are economic trends that might have impact on corruption, such as interest rates, inflation, economic recession, unemployment levels, energy availability, disposable income, etc. Also, competition between organizations is an extremely important factor that puts organization at risk. The above can have tremendous impact on organization's ability to adequately shield itself against corruption.

- **Technological**

  This relates to the rate at which existing technologies are maturing, and technological developments or trends that are aiding or providing effective protection against corruption. Technological challenges, including existence/absence of specific technology that may

facilitate control, accountability and transparency of the organizational processes are considered here.

There are numerous types of fraud aided by technology, e.g. hacking, identity theft, internet scams, system intrusion, etc. even as information technology has become an indispensable tool for organizational success.

- **Socio-cultural**

  Consideration is given to current or emerging trends in lifestyle, fashions, and other components of culture and their implications for the anti-corruption drive. Demographic trends that will affect the focus of interventions such as crime trends, income, population shifts, etc. are contextualized to determine if they represent opportunity or threats.

- **Legal**

  The Legal environment, including existence of proper and stable legislation that are clearly known and understood by all stakeholders and is being consistently applied and abided by is critical to corruption risks. Interactions between stakeholders should be analyzed. Conversely, hastily drafted legislation as well as lack of access to Justice would create more vulnerability.

- **Ecological**

  This relates to the physical environmental factors that could aid Corruption. Generally, a threat may be as a result of a natural phenomenon such as an earthquake, flood, storm, or a man-made incident such as fire, power failure, sabotage, decision on the location of an organization, etc. This can expose organizations to the risks of corruption.

4.3.3   Organizational Level

The human element is the major driver of corruption. Where the institutions have strong systems the human factor is curtailed. An organization must develop and entrench an effective anti-corruption strategy (ethics infrastructure, tone at the top, standard operating procedures, etc.) so as to keep tab on both the individuals and the systems it operates.

The risk of corruption at the organizational level can be illustrated using the **Donald Cressey's Fraud Triangle**, which defines three elements and conditions (risk factors) that allow for corruption to occur: Pressure, Opportunity, and Rationalization. It identified 3 elements as:

i)   Perceived financial pressure, or incentives (e.g., pressure to meet client expectations, financial targets, family/peer pressure);

ii)   Perceived opportunity to commit an act of corruption with a low likelihood of detection (e.g., monitoring/controls that are perceived to be ineffective, or very complex corporate structure);

iii)   Rationalization or Attitudes (e.g., history of illegal practices at the enterprise, such as, competitors pay bribes, no one will find out, if I don't do this I'll lose the contract and my job, low staff morale). Closely related to the fraud triangle is the Fraud Diamond.

Common Corruption Risks Areas in Public Organizations

According to Ayotola Jagun (2015), sources of corruption in specific public processes include:
  i.   Sales/Services to Government Customers
  ii.   Obtaining Licences and Permits
  iii.   Customs and Taxes
  iv.   Land Acquisitions
  v.   Public Procurement
  vi.   Public Recruitment
  vii.   Inspections
  viii.   Setting up Plants and Operations
  ix.   Judicial processes
  x.   Grants and Foreign Aid
  xi.   Events and sponsorships
  xii.   Dealings with communities

Once risks are identified, the next step is to determine the likelihood that the potential vulnerability can be exploited. Several factors need to be considered when determining this likelihood. First, the assessor needs to consider the source of the threat, the motivation behind the threat, and the capability of the source. Next is to determine the nature of the vulnerability and, finally, the existence and effectiveness of current controls to deter or mitigate the vulnerability. The likelihood that a potential vulnerability could be exploited can be described as high, medium, or low.

(Sources: Forensic Accounting, Michael Goldman & Associates, LLC, (2017) and Mark Jenkins (2014), Diamond is the New Triangle. Subex blog.

4.3.4   Personal Level (Corrupt Officers)

At the personal level, corruption occurs where there is monopoly of power or function plus huge discretion minus Accountability and Transparency. Corruption is likely to flourish where there is monopoly of function, large discretion, few institutional checks on power; obscure decision-making process; low detection; weak sanctions when detected; widespread poverty; weak civil societies; easy opportunities; weak oversight; weak Financial Management Systems; permissive socio-cultural environments, disregard for due process, etc. The theory put forward by **Robert Klitgaard (1998)** aptly captures this in the formula: $M + D - A(\&T) = C$

References	1. http://www.michaelgoldman.com/Forensic%20Accounting.html 2. *Ayotola Jagun (2015) Identifying Corruption Risk Factors and Schemes, Anti-Corruption Risk Assessment for Companies Seeking to Invest in Africa.* Transparency Denmark, Nov. 2015. 3. *Liljana Selinšek (2015), Corruption Risk Assessment in Public Institutions in South East Europe SEE2020 SERIES.* 4. Anti-Corruption Risk Assessment for Companies Seeking to Invest in Africa 5. Robert Klitgaard (1998), International Cooperation Against Corruption, Finance & Development, March 1998.

Focus Boxes	**EXAMPLES OF RISK FACTORS** **EXTERNAL AND SYSTEMIC RISK FACTOR** (factors outside of the control of the institution or sector, of which they should or could be aware) • Unclear or inconsistent legislation regulating certain sector, field of work of the public sector institution, specific project etc., including unclear wording of relevant legal texts, • Absence of basic legal framework needed to fight corruption and strengthen integrity (such as the effective criminal and civil codes, conflict of interest laws, meritocratic hiring rules, free access to public information laws, asset disclosure rules, codes of conduct, lobbying, regulation and whistleblower protection), including absence of penalties for violations of anti-corruption laws and regulations, • Unclear competences of the authorities, • Unadjusted or disharmonized work of public sector institutions, • Inefficient law enforcement and prosecution, • Inefficient or incompetent oversight institutions or supervisory authorities, • Non-transparent public finance processes, • Poor or wrong understanding of proper public sector functioning by certain individuals or the community. **INTERNAL (ORGANIZATIONAL, INSTITUTIONAL) RISK FACTORS** (factors within the control of the institution or sector that are the result of their actions or inactions, such as the rules and policies for good governance, management, decision-making, operational guidance and other internal regulations enabling the organization to its objectives, mission and tasks) • poor strategic and operational guidelines (policy) or inadequate policies, procedures or systems, • chronic failure to follow existing policies, procedures or systems, • unclear mandate of an institution, project, etc., • poor or inconsistent internal acts and regulations, • absence of warning and alert systems in case of different types of irregularities, weak managerial and administrative measures, including failures of management (middle managers or senior management either don't sufficiently understand the work to recognise that corrupt activity is happening or they facilitate the corruption by tolerating low level of non-compliance with all kinds of institutional rules),

- inadequate/weak work review, supervision, oversight or control procedures and audit mechanisms,
- absence of rules and procedures that promote ethical behaviour and transparency, poor organisational culture (this includes unclear messages about what is acceptable, examples set by management, inappropriate attitude to colleagues or subordinates, lack of reinforcement of ethical behaviour, bad office habits and other uncultured workplace practices),
- inadequate or insufficient system of training and education of public officials, including
- superiors and supervisors,
- inadequate human, finance, time etc. resources of an institution, project team, etc.,
- public officials have high level of power or influence, not consistent with their actual position
- inadequate supervision or work review over concrete public official or task,
- inappropriate relationships with clients,
- omission of conflicts of interest declaration,
- feelings of dissatisfaction or perceptions of unfairness at work,

WORKING PROCESS RISK FACTORS
(factors that arise from working procedures, systems and processes in an organization)
- public officials have high level of personal discretion and autonomy in decision making,
- non-transparent or unrecorded decision making,
- poor organization of work processes,
- unconnected work processes and procedural gaps, resulting in no sense of or ignorance of competences),
- lack of vertical or horizontal controls in the work processes.
Source: Liljana Selinšek (2015), Corruption Risk Assessment in Public Institutions in South East Europe SEE2020 SERIES.

4.3.5. Corruption Risk Assessment Instruments

Corruption Risk can be assessed with tools that are designed to extract basic information on the various component parts and operations of an organization. This involves collecting all policies and procedures currently in place and identifying those that are missing or undocumented. Interviews with key personnel can be conducted using questionnaires or surveys to assist in identifying assets and missing or out-of-date documentation. The systems or applications identified within the scope of the study are enumerated and all relevant information gathered on the current state of those systems. The review and analysis of the existing policies and procedures is done as desk review to gauge the compliance level within the organization. It is important to identify the portions that are deemed not to be in compliance with respect to the specific industry and organizational standard.

The following tools can be used to effectively assess the degree of corruption risk confronting an organization:
i.   Desk Review
ii.   Questionnaire
iii.   Face-to-face Interview
iv.   Practical Observation of the Work Processes
v.   Focus Group Discussion

vi.   Data Analyses/Reporting

Interrogating the Existing System

The existing system should be interrogated for the purpose of data gathering to execute the risk assessment. In doing so, the following should be considered:

1. How effective is the enabling law in view of current operational realities? Is the law obsolete?
2. Are there set policies to guide the different areas of organisational activity and interface e.g. Staff Administration (recruitment, training, posting, promotion, discipline etc.); Decision-making (level of decision-making and discretionary space); Oversight and Supervisory responsibilities etc.
3. If there are policies, are they being followed? Are they adequate in terms of currency/scope and are they clearly articulated, easy to interpret and known to staff, clients and general public?
4. Are instructions to staff formalised in writing and are they clear and easy to understand?
5. Are the instructions adequate and where they are not, how much room is given to discretion?
6. Are there supervisory checks? Is the supervision adequate? Is discretion in decision-making monitored and documented? What controls are in place especially in sensitive areas as financial transactions, stores etc. Are the controls effective?
7. What creates delay in the system, i.e. where are the bottlenecks? Are duties clearly defined and staff understand the scope of their schedules? Are deadlines given on jobs and are they known and adhered to?
8. Is sensitive information secure in the organization? What is the level of computerization? Is the network secure with adequate level of security (access control, firewalls etc.
9. Is the public aware of necessary information on tariffs, charges and fees? etc.

4.3.6. Identification of Assets, Liabilities and Risks in the Organization

Corruption Risk Factors refer to the reasons why corruption may occur at an organization based on its environment, including the nature of its operations and locations. Corruption in the Organization Assets and Liabilities of the organization, hence the need to identify and protect them. The risk assessment process begins with the identification of risk categories. An organization most likely will have several risk categories. Assessors would need to analyse and identify both assets and liabilities that could be put at risk within the organization.

Assets/Opportunities	Threats/Liabilities	Risks/Hazards/Events
Reputation	Fire	Corruption Risks
Vehicle	Flood/Natural Disasters	Project management risks
Fuel	Power/Utility Failure	Technical/IT Risks
Impartiality	Customers & Suppliers	Financial Risks
Procedures & Systems	Disaffected Staff	External Risks
Cash	Spies	Compliance Risks, etc.
Commodity	Thieves	Residual Risk
Trust	Vandals	Inherent Risk
Staff	Terrorists	

| Equipment | Hackers | |
| Motivation, etc. | Errors & Mistakes | |

Once the risks are identified, the next step is to determine the likelihood that the potential vulnerability can be exploited. Several factors need to be considered when determining this likelihood. First, the assessor needs to consider the source of the threat, the motivation behind the threat, and the capability of the source. Next is to determine the nature of the vulnerability and, finally, the existence and effectiveness of current controls to deter or mitigate the vulnerability. The likelihood that a potential vulnerability could be exploited can be described as high, medium, or low.

Chapter   4.4.0. Assessing the Inherent Risks

4.4.1. Introduction
4.4.2. Vulnerability
4.4.3. Risk analysis
4.4.4. Rating Potential Impact of Occurrence

Learning Objectives
At the end of this chapter, participants are expected to be able to:
▪   define the concepts of probability and impact of corruption risks
▪   associate the probability and impact to the various corruption risk factors
▪   determine the probability of occurrence and impact of a corruption risks on the organization
▪   design probability and impact rating scales
▪   compute probability and impact scoring matrices.

4.4.1. Introduction
The high point of any corruption risk assessment is the ability to calculate the value of the inherent risk using the probability and impact assessments. This section explains the modalities for evaluating the probability of corruption occurrence by assessing the vulnerability of the organization to the particular risk factor and the frequency with which that particular risk had occurred previously in the organization. With good record-keeping, organizations keep track of happenings within its domain. This comes handy in determining the frequency of a particular corruption scheme.

4.4.2. Vulnerability
Vulnerability in the context of corruption risk assessment can be defined as a gap in security or safety procedures or a weakness in internal controls that could be corruptly exploited which could result in a security breach, corruption or losses. A vulnerability assessment is a risk management process used to identify, quantify and rank how much a system or organization is prone to corruption. Typically, vulnerability assessment starts at the desk review phase, during which important data regarding the organization or target systems and resources are gathered. This phase leads to the actual fieldwork whereby the organization is essentially checked for all known vulnerabilities. For instance, if we are to perform a vulnerability assessment of our homes, we would likely check each door to see if they are closed and locked. We would also check every

window, making sure that they closed completely and latched correctly. This same concept applies to systems, networks, organizations and sectors.

- **Vulnerability Analysis**
  The purpose of vulnerability analysis is to take what was identified in the gathering of information and test to determine the current exposure, whether current safe guards are sufficient in terms of confidentiality, integrity or availability. It will also give an indication as to whether the proposed safe guards will be sufficient. Various tools can be used to identify specific vulnerabilities in systems. In estimating vulnerability, questions such as:
  i. How business-critical or sensitive are the vulnerable assets?
  ii. Have there been attempts on the vulnerable assets in the past?
  iii. How is the vulnerability being exploited by corrupt people?

4.4.3. Risk Analysis

Risk factor means any attribute, characteristic or exposure of an individual, institution or process that increases the likelihood of corrupt behaviour, breach of integrity, unethical behaviour or other conduct that can have negative effects on objectives and goals of a public sector institution (its mandate, duties or processes)

In order to efficiently and effectively deploy resources to an organization's identified corruption risks and the associated schemes, it is imperative to rate both the ***probability that each scheme might occur and the corresponding potential impact of that occurrence***. The probability of each identified corruption scheme is assessed without consideration of the controls in place at the organization. Focus is usually on areas within the organization where opportunities for perpetrating the corruption scheme are plentiful because of the absence of sufficient control environment. Consideration is given to the probability of the corruption scheme that could be perpetrated by an individual or group of individuals acting collusively. Under this framework, it is recommended that the assessment of probability be couched as the probability of the event occurring within the next 12 months. This timeframe should be adjusted as necessary to fit the characteristics of the organization's corruption risk management objectives. Some of the factors to consider when estimating the probability of each corruption scheme include:

1. The nature of the transaction or process to which the scheme relates (e.g., whether there is any interaction with government officials);
2. Incidents of the corruption scheme occurring in the past at the enterprise;
3. Incidents of the corruption scheme in the enterprise's industry;
4. The local corruption culture and environment in the region where the scheme would be perpetrated;
5. The number of individual transactions related to the scheme;
6. The complexity of the scheme and the level of knowledge and skill required for execution;
7. The number of individuals needed to perpetrate the scheme; and
8. The number of individuals involved in approving or reviewing the process or transaction related to the scheme.

- **Probability Scoring Matrix**

3-Point Scoring Matrix for identified Corruption Schemes	Score
Little probability of corruption activity	1
Some probability of corruption activity	2
High probability of corruption activity	3
5-Point Scoring Matrix for identified Corruption Schemes	**Score**
Minimal probability of corruption activity	1
Little probability of corruption activity	2
Some probability of corruption activity	3
Considerable probability of corruption activity	4
Very high probability of corruption activity	5

Source: A Guide for Anti-Corruption Risk Assessment, The Global Compact, 2013

4.4.4. Rating Potential Impact of Occurrence

The process of assessing the potential impact of a corruption scheme is carried out in a similar manner to the process for probability. The Assessors should evaluate the magnitude of the potential impact for each particular corruption scheme. Typically, this consideration of potential impact covers a wide range including financial, legal, regulatory, operational, and reputational damages. Some of the factors to consider when estimating the potential impact of each risk or scheme include:

1. Impact of past incidents of the corruption scheme on the organization, if any;
2. Impact of incidents of the corruption scheme on other organizations;
3. Potential amounts of fines or penalties;
4. The opportunity cost arising from regulatory restrictions on the organization's ability to operate or expand;
5. Impact on operations such as interruption in the enterprise's ability to transport goods or obtain permits or other required approvals;
6. Potential impact on financial statements;
7. Impact on recruitment and retention of employees;
8. Impact on retention of customers and future revenues;

There are many different ways to rate and communicate the probability or potential impact of each corruption risk or scheme. A simple qualitative scale could be used to judiciously classify each scheme's probability or potential impact as either (i) high, medium, or low, or (ii) very high, high, medium, low, and very low. Alternatively, a quantitative scale, with scores applied judiciously to each scheme, could be used.

- **Potential Impact Scoring Matrix**

3-Point Potential Impact Scoring Matrix for identified Corruption scheme	
Narrative categorization of corruption scheme potential impact	**score**
Insignificant impact	1
Moderate impact	2

High impact	3
5-Point Potential Impact Scoring Matrix for identified Corruption scheme	
Insignificant Impact	1
Minor Impact	2
Moderate Impact	3
Major Impact	4
Catastrophic Impact	5

Source: A Guide for Anti-Corruption Risk Assessment, The Global Compact, 2013

Fill in the entries in the table below:

S/N	Risk Factor	Probability	Impact (N)	Inherent Risk
1.	Existing operational guidelines, rules, laws, and regulations (**A**)		60,658	4,124,744
2.	Communication/external relations (**B**)	37		
3.	Budget Preparation processes (**C**)	54	72,009	3,888,486
4.	Contract award and implementation processes (**D**)	83		5,752,066
5.	Disciplinary processes (**E**)	49	66,001	

Class Activity

Reference

1. The Global Compact. A Guide for Anti-Corruption Risk Assessment, 2013
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4. https://www.synopsys.com/software-integrity/resources/knowledge-database/vulnerability-assessment.html
6. https://www.techopedia.com/definition/16525/vulnerability-assessment.
7. http://web.mit.edu/rhel-doc/5/RHEL-5-manual/Deployment_Guide-en-US/ch-sec-access.html
8. https://www.alienvault.com/solutions/vulnerability-assessment-remediation

CHAPTER   4.5.0.   Measuring Corruption Risk

Learning Objectives

At the end of this chapter, participants are expected to be able to:

- define the concepts of probability and impact of corruption risks
- associate the probability and impact to the various corruption risk factors
- determine the probability of occurrence and impact of a corruption risks on the organization
- design probability and impact rating scales
- compute probability and impact scoring matrices.

4.5.1.   Introduction

One of the keys to an effective risk assessment process is to have the right individuals scoring the probability and potential impact of each corruption scheme. It is important to involve only those individuals who are familiar with the transaction or process impacted by each scheme, including process owners. In cases where the views of more than one individual are sought, an average of the score could be taken. Involving multiple people (each responsible for areas relevant to them) can help to reduce the effect of individual biases that could otherwise skew the results. One of the roles of an anti-corruption risk assessor or project manager could be to assess the reasonableness of the raw scores designated by the relevant parties and make suggestions for questioning or re-evaluating any ratings that appear questionable. Protocols for estimating the ratings (including who should be involved) and questioning or proposing any re-evaluation of ratings should preferably be determined up front as part of the overall anti-corruption risk assessment policy and procedure. This can help to avoid one or more individuals inappropriately overriding the judgments of people closest to the risks in an attempt to produce a result that is convenient rather than accurate.

4.5.1.1. Determining the Risk Level

We have done our risk identification in the previous chapter. Here, we proceed to calculate our inherent risks. There are several organizational approaches for assessing inherent risks. One is to have workshops or group meetings, either for the relevant functions or for individuals who will be responsible for the preliminary ratings of probability and potential impact for a group of risks and schemes. During these sessions, participants can be asked to rate each corruption scheme either anonymously or openly. This may be done by discussing each scheme to arrive at a consensus rating, or by having each participant individually rate each scheme (either openly or anonymously) and then calculating the group's average score for each scheme.

Another approach is to use online surveys, where participants are asked to provide a rating for each risk via intranet or email. For this option, a designated person should be assigned to coordinate the survey and collate the results. A third option is for the person responsible for coordinating the risk assessment to meet with each participant, obtain their scores and then calculate an average inherent risk score for each scheme. A fourth option is for the person responsible for the risk assessment to make a preliminary assessment of the risk ratings themselves, and then provide it to the relevant process owners and functions to review and amend if necessary. One danger of this last approach is that the initial scores provided may bias the responses of participants and lead to a result that is a reflection of one person's view.

4.5.2. The Corruption Risk Matrix

A risk assessment matrix provides the Assessors with a quick view of the risks and the priority with which each of these risks needs to be handled. Combination of the probability and potential impact assessments for each corruption scheme results in an assessment of corruption risk. The inherent risk represents the overall risk level of each scheme without consideration to existing controls. It is these areas where mitigating controls will likely be most important in mitigating corruption schemes.

The risk assessment template uses a scatter plot and gradient shading to highlight the comparative risks associated with different risk factors or activities. Before constructing the risk assessment template, you will first need to decide upon the nomenclature and scale to express the probability and magnitude of the possible loss that could be encountered if the risk materializes. The example given uses a 1 to 5 scale for consequences of occurrence and the probability into 6 possible ranges as shown in the diagram below.

The overall corruption risk assessment involves determining risks, gathering risk data, determining the probability and the impact levels of the risks, understanding consequences, assigning priorities and developing risk prevention strategies. On the other hand, a risk assessment matrix only provides the Assessors with a quick view of the risks and the priority with which each of these risks needs to be handled.

Extreme or High Risk: The risks that fall within this zone 'E' (red color), are the risks that are most critical and that must be addressed on a high priority basis. The Risk Assessors should gear up for immediate action, so as to eliminate the risk completely.

Medium: If a risk falls in one of the orange zones marked B & C, it is best to take some reasonable steps and develop risk management strategies in time, even though there is no hurry to have such risks sorted out early. Such risks do not require extensive resources; rather they can be handled with smart thinking and logical planning.

Low Risk: The risks that fall in the green zone marked A, can be ignored as they usually do not pose any significant problem. However still, if some reasonable steps can help in fighting these risks, such steps should be taken to improve overall performance of the project.

4.5.3. Populating the Risks Matrix

As mentioned above, in a risk assessment matrix, risks are placed on the matrix based on two criteria:

1. **Likelihood:** the probability of a risk calculated as (vulnerability X Frequency).
2. **Consequences:** the potential impact, severity or extent of damage arising from the risk.

It is important to mention here that there are two methods used in the calculation of inherent risks. While some authors multiply the values of Probabilities by Consequences, others simply add up the two to get the value inherent risk. Either of the methods would depict the risk trend. E.g.

Corruption Risk Probability Score A + Potential Corruption Impact Score B = Inherent Corruption Risk Score C

Source: The Global Compact. A Guide for Anti-Corruption Risk Assessment, 2013 (Section E4)

Risk is expressed as a factor of the likelihood of corruption multiplied by the impact of corruption

Source: Andy McDevitt, Corruption Risk Assessment Topic Guide, 2011 (P.2). Transparency International.

Scaling is one of the most important aspect of this task. All the figures generated

- **Likelihood (Probability) of Occurrence - qualitative**
  Based on the likelihood of the occurrence of a risk, the risks can be classified under several categories one of which is as follows:

1. **Definite:** A risk that is almost certain to show-up during corruption risk assessment. A risk that is more than 80% likely to occur.
2. **Likely:** Risks that have 60-80% chances of occurrence can be grouped as likely.
3. **Occasional:** Risks which have a near 50/50 probability of occurrence.
4. **Seldom:** Risks that have low probability of occurrence but still cannot be ruled out completely, between 10% to 40%.

Unlikely: Rare and exceptional risks which have a less than 10% chance of occurrence.

- **Likelihood (Probability) of Occurrence - quantitative**
1. **Remote** - Probability of less than 10%.
2. **Highly Unlikely** - Probability between 10% and 35%.
3. **Possible** - Probability between 36% to 50%.
4. **Probable** - Probability between 51% to 60%.
5. **Highly Likely** - Probability 61% to 90%.
6. **Certain** - Probability above 90%.

- **Consequences (Impact) of occurrence - qualitative**
  The consequences of a risk can again be ranked and classified into one of the five categories, based on how severe the damage can be.
1. **Insignificant:** Risks that will cause a near negligible amount of damage to the overall progress of the project.
2. **Marginal:** If a risk will result in some damage, but the extent of damage is not too significant and is not likely to make much of a difference to the overall progress of the project.
3. **Moderate:** Risks which do not impose a great threat, but yet a sizable damage can be classified as moderate.
4. **Critical:** Risks with significantly large consequences which can lead to a great amount of loss are classified as critical.
5. **Catastrophic:** These are the risks which can make the project completely unproductive and unfruitful, and must be a top priority during risk management.

- **Consequences (Impact) of occurrence - quantitative**
1. **Insignificant** - Easily handled within the normal course of operations with no additional costs. (Impact level <10.)
2. **Minor** - Some disruption within the normal functions. Manageable risk with minimum estimated cost. (Impact level between 11 and 25.)
3. **Moderate** - Immediate time/resource reallocation will be necessary with a moderate estimated cost. (Impact level between 26 and 50.)
4. **Major** - Operations are severely disrupted and significant risk of failure to part of the business is possible. (Impact level between 51 and 75.)
5. **Critical -** Significant going concerns exists with the business and the risk is classified as critical. (Impact level >75.)
   Example of a qualitative scale for determining inherent risk is attached below:

Probability	Potential Impact	Inherent Corruption Risk
High	Low	Medium
High	Medium	High or Medium
High	High	High
Medium	Low	Medium or Low
Medium	Medium	Medium
Medium	High	Medium or High
Low	Low	Low
Low	Medium	Low or Medium
Low	High	Medium

Source: A Guide for Anti-Corruption Risk Assessment, The Global Compact, 2013

- **Multi-Factor Probability Scoring Matrix**

Probability	Scale	Percentage Range	Status of the actual cases of the scheme	Complexity
Very low probability of corruption	1	> 10% chance	Root cause of incident has been remediated (reducing the chance of repeat occurrence).	Very difficult to perpetrate even without controls place.
Little probability of corruption activity	2	10%–25% chance	Root cause of incident is in the process of be	Difficult to perpetrate even without controls in place
Some probability of corruption activity	3	26%–50% chance	Incident has been contained.	Moderately complex to perpetrate without controls in place.
Considerable probability of corruption activity	4	51%–75% chance	Incident is in the process of being contained.	Easy to perpetrate without controls in place
Very high probability of corruption activity	5	> 75% chance	Incident has been reported and is currently under investigation.	Very easy to perpetrate without controls in place.

Source: A Guide for Anti-Corruption Risk Assessment, The Global Compact, 2013

- **Using the Risk Assessment Matrix**
  Once the risks have been placed in the matrix, in cells corresponding to the appropriate likelihood and consequences, it becomes visibly clear as to which risks must be handled at what priority. Each of the risks placed in the table will fall under one of the categories, for

which different colors have been used in the sample risk assessment template provided below. Here are some details on each of the categories:
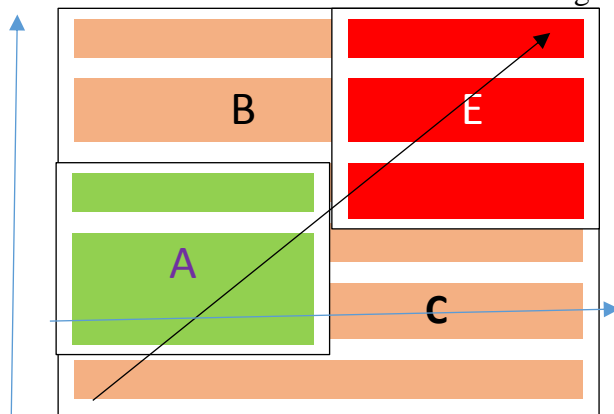
Source: Author

Class Activity	1. From the table below, fill in the appropriate values for the scaling of probability and impact based on the information from the class activity in chapter 4.4.0., section 4.4.4.1. 2. Using the graph below, plot each value of probability against impact on the graph to produce a risk matrix.

Scale	Probability	Impact
1	0-20	0 - 20,000
2		
3		
4		
5		
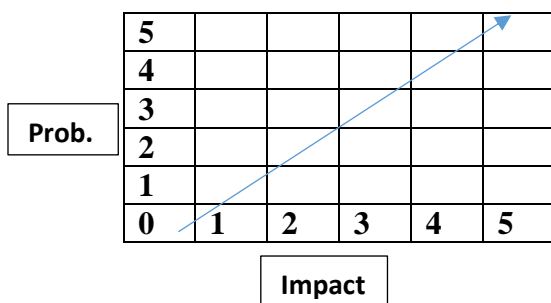
Prob.

Impact

Reference	1. The Global Compact. A Guide for Anti-Corruption Risk Assessment, 2013 *https://www.unglobalcompact.org/library/411* 2. Andy McDevitt, Corruption Risk Assessment Topic Guide, 2011 (P.2). Transparency International.

4.5.4. Including Risk Ratings in the Risk Register

The overall assigned probability, potential impact, and inherent risk ratings for each risk or scheme can be included in the risk register as follows:

S/N	CORRUPTION RISK FACTOR	Likelihood of occurrence (Probability)		Consequence (Impact)	
		Vulnerability	Frequency	Economic cost	Reputational cost
1.	Existing administrative policies	3	1	0	1
2.	Staff recruitment processes	2	2	1	1
3.	Contract solicitation and pre-qualification processes	1	3	2	0
4.	Staff incentives/benefits (training, grants, awards, recognition, etc)	1	1	0	1
5.	Budget Implementation	1	1	1	1
6.	Existing administrative structure	1	1	1	2
7.	Staff posting/job rotation	2	2	0	3
8.	Internal payment system	3	1	3	0
9.	Contract planning and Needs Assessment processes	2	1	3	1
10.	Legislative and executive oversight of the organization	4	1	3	2
11.	Budget Preparation processes	4	1	3	1
12.	Contract award and implementation processes	5	1	2	3

Key	Risk Factor	Probability	Impact	Inherent Risk
A	Existing administrative policies	3	1	4
B	Staff recruitment processes	4	2	6
C	Contract solicitation and pre-qualification processes	3	2	5
D	Staff incentives/benefits (training, grants, awards, recognition, etc)	1	1	2
E	Budget Implementation	1	2	3
F	Existing administrative structure	1	3	4
G	Staff posting/job rotation	4	3	7
H	Internal payment system	3	3	6
I	Contract planning and Needs Assessment processes	2	4	6
J	Legislative and executive oversight of the organization	4	5	9
K	Budget Preparation processes	4	4	8
L	Contract award and implementation processes	5	5	10

Source: Author

5

L

B   G   K   J

4

A

C   H

3

2

I

1

D   E   F

0

1   2   3   4   5

IMPACT (CONSEQUENCES)

PROBABILITY (LIKELIHOOD)

Very high   L

Considerable   B   G   K   J

Somewhat   A   C   H

Little   I

Minimal   D   E   F

| Insignificant Impact | Minor Impact | Moderate Impact | Major Impact | Catastrophic Impact |

IMPACT (CONSEQUENCES)
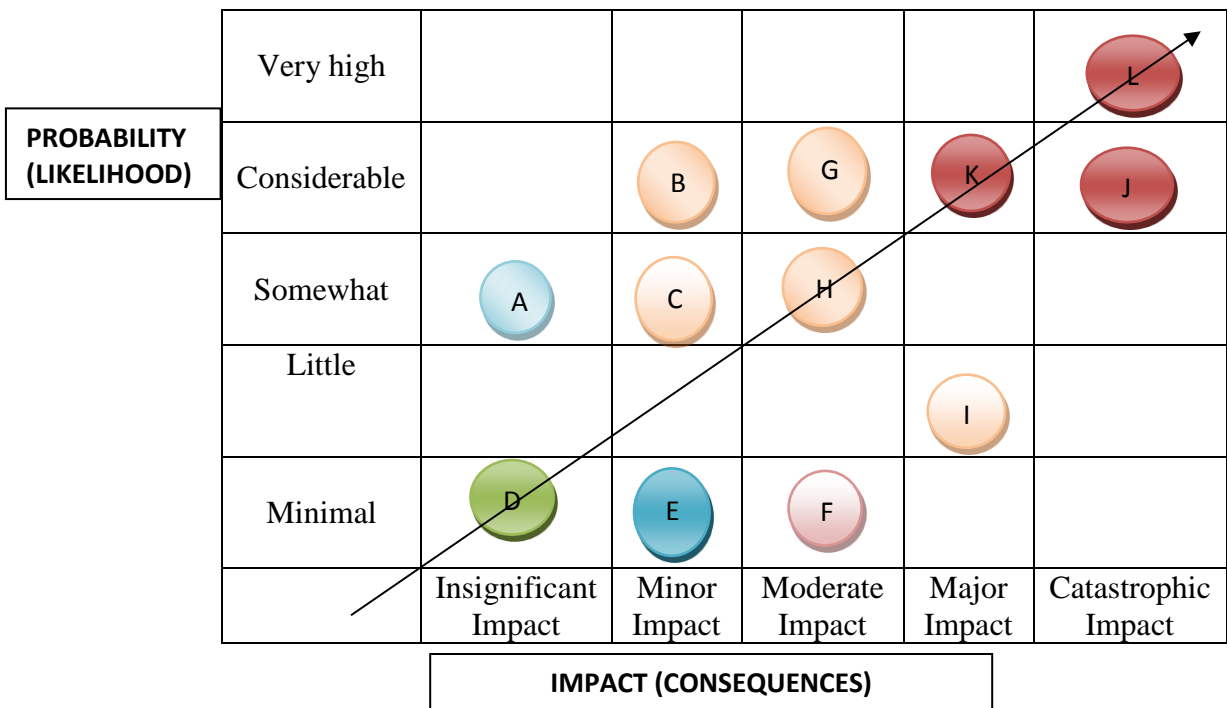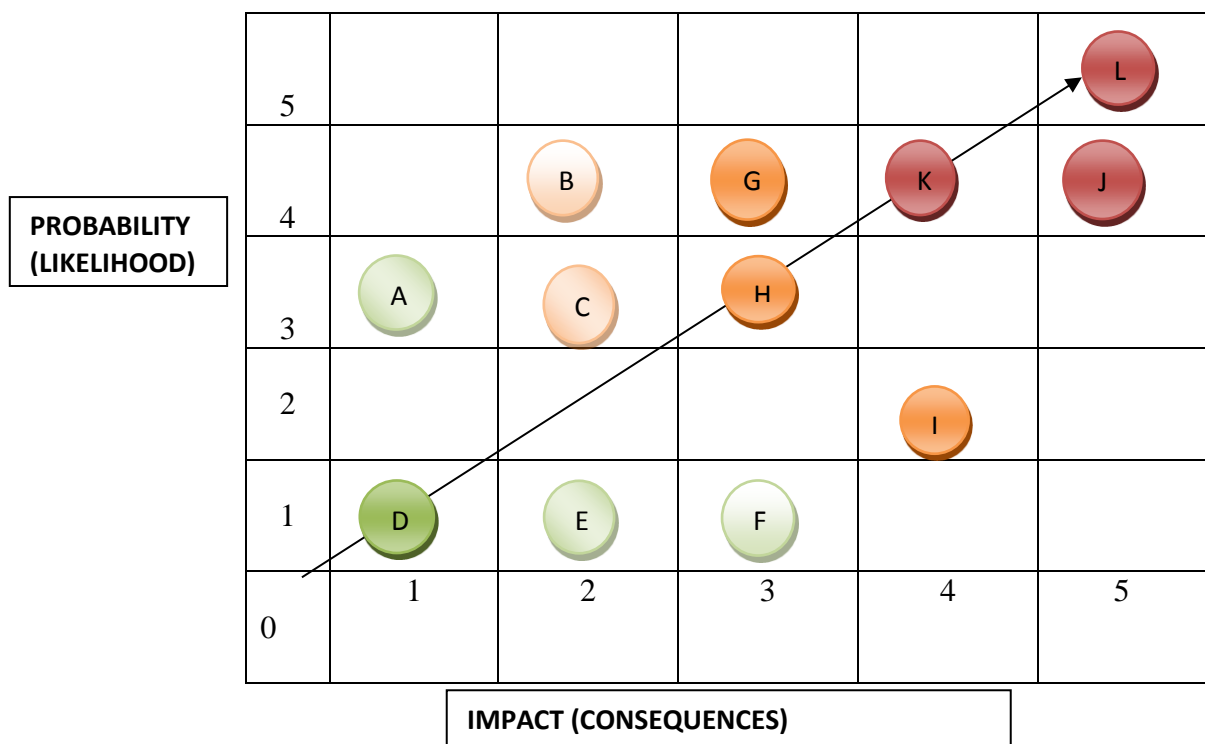
Qualitative Matrix

Major	Minor	Moderate	Major	Major
Moderate	Minor	Moderate	Moderate	Major
Minor	Minor	Minor	Moderate	Moderate
Nil	Nil	Minor	Minor	Minor
	Nil	Minor	Moderate	Major

Probability (row label)

Impact (column label)

Class Activity

Use the table below to prioritize the risks using the Edmead's Matrix given:

S/N	Risk Factors	Probability	Impact
1.	Examination management (A)	0.4	21
2.	Recruitment (B)	0.7	27
3.	Entertainment (C)	0.5	15
4.	Contract (D)	0.8	26
5.	Revenue collection (E)	0.6	19

Probability\Impact	Minimal (1-6)	Little (7-12)	Some (13-18)	Considerable (19-25)	Very High (26-30)
Certain (0.8-1.0)					
Highly likely (0.6-0.79)					
Probable (0.4-0.59)					
Possible (0.2-0.39)					
Highly unlikely (0-0.19)					

Mark Edmead's Matrix

CHAPTER 4.6.0. CORRUPTION RISK PRIORITIZATION

4.6.1. Introduction
4.6.2. Prioritizing the Risks
4.6.3. The Risk Prioritization Table

Learning Objectives
At the end of this chapter, participants are expected to be able to:
- calculate the inherent risks
- determine the determine the corruption risks that should be given the greatest attention by the organization
- weigh the consequences of dealing with one risk at the expense of another.
- Communicate findings to management clearly and convincingly.

4.6.1. Introduction
The fact that resources are scarce, it is not possible to mitigate all the identified corruption risks the organization is confronted with at all times. It therefore becomes imperative to prioritize the risks to be dealt with first.

4.6.2. Prioritizing the Risks
The risks are prioritized based on the following criteria:
1. How likely is the risk to occur? (Low, Medium, High probability
2. How frequent is the occurrence of the corruption risk according to research? (Low, Medium, High)
3. How likely is that the form of corruption requires a corrupt network to be established within the organization? (Not likely, Likely, Very likely)
4. What is the economic effect of the risk? (low: up to 500000 NGN, medium: between 500000 and 1 million NGN, High: above 1 million NGN)
5. What is the reputational cost to the organization? (Insignificant, Moderate, High)
6. What is the security effect of the risk? (Low: no security threat associated; Medium: may be connected to security risk; High: definite danger for the security of the country).

The risks should then be classified into three groups:
1. Serious risks: for immediate addressing
2. Medium level risk: to be addressed in mid-term perspective
3. Low-level risks: to be addressed in the longer term or just monitored.

4.6.3. The Risk Prioritization Table

S/N	RISK	PROBABILITY	IMPACT	PRIORITY

CHAPTER   4.7.0. RISK MITIGATION

4.7.1. Risk mitigation processes
4.7.2. Designing Integrity Plan
4.7.3. Integrity Plan Implementation and Monitoring

Learning Objectives
At the end of this chapter, participants are expected to be able to:
- analyse the various mitigation options
- consider all alternative causes of actions
- outline all risk elements to be dealt with in the mitigation process
- design a mitigation plan
- implement, monitor and evaluate plan.

4.7.1. Risk Mitigation Processes
- Principle of separation of duties and responsibility;
- Documentation and preservation of appropriate evidence;
- Supervision;
- Limitation of access to resources and information to authorized persons;
- Training and development of staff, employee performance review;
- Correct reporting on the controls performed and their results

4.7.2. Designing Integrity Plan

The plan should relate the recommended measure to a specific risk and detail a time-frame and responsible actors for implementation.

- **Elements:**
  1. Code of conduct
  2. Commitment from the top
  3. Standards and procedures in specific areas
  4. Risk assessment (integrity plans in the strict sense of the word)
  5. Update and adaptation
  6. Mainstreaming compliance into management
  7. Strengthening existing internal controls
  8. Training
  9. Internal reporting channels and whistleblower protection.
  10. Disciplinary procedures
  11. Due diligence
  12. Contract provisions in Public Procurement
  13. Periodic testing and auditing of the Integrity system.

Risk	Measure	Time -frame	Responsible Dept./Unit/ Officer
Inexistent or obsolete policy	Formulation /Review of policy	1month	Board
Arbitrary operational procedures	Design standard operational procedures	6 weeks	Management
Poor Records Management	• Staff Training • Computerization	• 1 month • Next budget year	• Training Unit • Management

Source: R.A. Okoduwa, mni

4.8.0. Summary

In summary the threat and risk assessment process is not a means to an end. It is a continual process that once started should be reviewed regularly to ensure that the protection mechanisms currently in place still meet the required objectives. The assessment should adequately address the security requirements of the organization in terms of integrity, availability and confidentiality. The threat and risk assessment should be an integral part of the overall life cycle of the infrastructure. Organizations that do not perform a threat and risk analysis are leaving themselves open to situations that could disrupt, damage or destroy their ability to conduct business. Therefore, the importance of performing a threat and risk analysis must be realized by both the staff supporting the infrastructure and those that rely upon it for their business.

4.9.0. Conclusion

Effective corruption risk management allow an organization to identify its strengths, weaknesses, opportunities and threats. By planning for unexpected events, organization is prepared and can respond if they arise. To ensure organizational success, it is imperative to define how potential risks would be handled so as to be able to identify, mitigate or avoid problems when the need arises. Successful managers recognize that risk management is important, because to achieve organizational goals depends on planning, preparation, results and evaluation that contribute to achieving strategic goals. Corruption risk assessment is therefore a robust anti-corruption preventive too.

Assessment Questions	Dividing the class into five groups, each group should choose an organization of their choice to carry out a Corruption Risk Assessment. Using the corruption risk factors assigned to each group and the knowledge of the organizations, carry out the following activities:

i.   Outline appropriate corruption schemes associated with each of the given risk factor.
ii.   Design a questionnaire to collect relevant data.
iii.   Use the data to calculate the likelihood of occurrence and potential impact of each of the corruption scheme on the organization.
iv.   Develop a Risk Prioritization matrix showing all the steps
v.   Advise the organization appropriately and justify your position.
      Each group will do a presentation at plenary, demonstrating adequate mastery of the processes.

Group A

1. Existing administrative policies
2. Staff recruitment processes
3. Contract solicitation and pre-qualification processes
4. Staff incentives/benefits (training, grants, awards, recognition, etc)
5. Budget Implementation

Group B

1. Existing administrative structure
2. Staff posting/job rotation
3. Internal payment system
4. Contract planning and Needs Assessment processes
5. Legislative and executive oversight of the organization

Group C

1. Existing operational guidelines, rules, laws, and regulations
2. Communication/external relations
3. Budget Preparation processes
4. Contract award and implementation processes
5. Disciplinary processes

Group D

1. Existing internal control mechanisms
2. Irregular expenditures (on events, ceremonies, receptions, celebrations, workshops, etc)
3. Budget Monitoring and Evaluation
4. Existing Compliance systems/ACTU
5. Interface with external stakeholders

Group E

1. Existing gift and hospitality management systems
2. Existing financial management systems
3. Utilization of official assets (name, time, premises, equipment, etc)
4. Records/confidentiality management systems
5. Timeliness in decision making and action

Reference

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MODULE 5.0: **BEHAVIOUR CHANGE MANAGEMENT**

Chapter   **5.1.0. Nature of corrupt practices/behaviours and their consequences**
5.2.0. Why Behaviour is Changed?
5.3.0. How Behaviour is Changed and Managed?
5.4.0. Strategy and stages of Change in Behaviour
5.5.0   Operant conditioning

Overview
After completing Topics 1-4 participants should be well armed to promote corruption prevention and manage the process of behaviour change. They must have acquired the skills required for effectively explaining the disadvantages of the high level of corruption and of the need to embark on the encouragement of individuals who are not involved in corrupt practices not to venture into those practices. In topic 5 trainees will be introduced to the components of behaviour change based on behaviour change modelling and the stages through which individuals reach the expected goal of accepting and adopting corruption prevention strategies in the daily lives and interactions.

The change modelling and staging are well documented and familiar in disciplines such as public health and health education (Adeokun, 2014, chapter 5, pages 23-40). These behaviour change communication approaches will form the resource material and content upon which topic 5 will be based. The appropriate framework that will help participants cope with the challenges of different stages of behaviour change and the dynamics involved in interacting with stakeholders and actors involved in corruption prevention – behaviour will be discussed. The choice of specific behaviour change communication strategy will depend upon the requirements of the project of change as well as the social context of the target group or population.

Introduction
While a sound legal system, good government policies and strategies, excellent set of rules for workers can on the face it present an almost perfect structure for prevention of corruption, however, these laws, policies/strategies, rules don't have heads, hands, legs, nor intellect to effect their respective contents. Human beings are the actors saddled with the responsibility of giving life to the laws, policies/strategies and rules, to enforce it; likewise humans must have to exist for these frameworks to be enforced against. Thus, the habit, character, behaviour and dispositions of these actors are of paramount importance as the framework itself. Hence, just as specific types of frameworks are required par time to achieve a desired result in corruption prevention crusade so also is required a specific type of behavioural framework.

General Learning Objectives
By the end of topic 5 the participants should be able to
- Identify what constitutes Corrupt Behaviour
- Discuss the unacceptable consequences of corrupt behaviour at the individual, community and national levels.
- Identify the role of corruption prevention in aiding the combating of corrupt practices
- Understanding the various rolls of behaviour change communication in taking the target population through stages through which their thought process must pass for the population to be able to transit from unawareness of need for corrupt behaviour prevention to commitment to active acceptance of promoting corruption prevention and sustaining the learned skills and practices of corruption prevention in their activities.

Resource Materials
1. Handouts on HBM (Health Belief Model) e.g. photocopy of Stages of Behaviour change
2. Flip chart
3. Power point projector

Method/Content

The mindset of the trainer must be one of attempting to "convert" the trainees on the assumption that the concepts in the module are not public knowledge and that they have to understand, reflect and evaluate the importance of accepting the behaviour change implications involved in corruption prevention.

There should be more reliance on adult learning employing brain storming, exchange of views, role play and other methods that will make abstract notions more realistic.

Module Objectives
1. Understand the general concept of Corruption Behavior
2. To describe adequately a target corruption behavior
3. Sufficiently explain a corrupt behavior highlighting the actors involved
4. To have the ability to identify corrupt behaviors even among trainees

The essence of corrupt behavior is that they are practices which operate the moral values and conventional norms relating to the rules of engagement in social and economic interactions in those domains of life. The exchange of services for payment is regulated by conventions guiding any market. When those conventions are breached, then a corrupt behavior has taken place. Consequently deviations from the accepted norms of behavior are regarded as corrupt. The medium of the corrupt practice can be financial, favors and access to privileges to which the party is not normally entitled.

In as much as both parties engaged in a corrupt practice can both derive benefits from the transaction, the reporting of corrupt behavior, though illegal is generally under=reported. And in some instances, the law holds both parties criminal in intent and action. This further reduces the incentive to make a formal complaint even if one party feels cheated in the "deal"

5.1.1. Nature of Corrupt Practices (Behavior and their Consequences)

Corrupt behavior varies in magnitude from small scale extortion of clients to large scale acquisition of large sums of public funds through fraudulent transactions. The network involved in any one corrupt behavior can be limited to two individuals to a complicated involvement of many institutions. Because of the increasing awareness of the adverse consequences on the social indicates and slow economic development directly linked with these corrupt practices and the relatively slow progress towards the reduction of corruption, a new approach is being adopted to prevent corrupt practices in the first place.

Bribes are illegally accepted payments for obtaining services to which the bribing party may not be entitled or which is being withheld by the official until the illegal payment is made. In effect, bribery benefits corrupt officials to achieve private financial gain and for the bribing party to either gain outcomes faster than others, to motivate the officials to turn a blind eye on illegal conduct or to buy influence with monetary power. Degradation of the value system has made persons

exhibiting overt corruption tendencies to be celebrated. Some are even referred as being "sharp" i.e. intelligent for exhibiting corrupt tendencies.

5.1.2. Explanation of Corrupt Behavior

As bribing behavior is generally rewarded it is, according to Thorndike's Law of Effect, repeated and socially reinforced. Conditioning to bribery starts early as primary school by teachers accepting bribes from the parents to pass their children, forming early causal antecedents. The locus of control shifts for the briber from an external institution and its objective norms - with outcomes based on perceived luck (Weiner, 2010, p.30) – to a personal relationship with the bribed official and shared subjective norms which are far more controllable.

Corrupt behavior is highly successful as it moves the prospect of achieving one's goals to within the person. Since bribing is, despite its common appearance, still a risky business it is a difficult task. Attributing an internal causal locus for success leads to high personal pride for the briber (Weiner, p.31), besides the externally gained incentives. Self-ascriptions and attributions are skills, ability or personality. Primary motivation for bribing behavior is extrinsic since the rewards are external. Motivation and subsequently cognitive situational focus (Borgida & Mobilio, 2000, p.349) is amplified if the goal is based on social pressure (Armitage & Christian, 2003, p.190) and includes interest of the family or an associated group.

In this explanation the emphasis is on the benefits and preferred outcome for those offering and bribe and those receiving it. the pattern, however, excludes those corrupt practices which are euphemism for outright stealing of what belongs to others or to the commonwealth. In such instances these are criminal activities of opportunity offered to access to the stolen resources from a position of trust which is them breached by the official or politician.

Chapter   5.2.0 Why Behaviour is Changed

Overview

If the level of corrupt practices was low and its impact of society benign, there will be no outcry against such practices. Unfortunately, the consequences are serious and in some aspects quire catastrophic. To illustrate there is a link between the embezzlement of funds for major projects and the slow completion, poor quality of performance and the wastage of resources when constructions collapse and lives are lost. From a social statistical point of view, there are significant correlations between levels of corruption and such welfare and demographic indicators and maternal, infant and child mortality rates. The inability of health systems to deliver the necessary levels of services and care is also a bye product of corrupt behavior. Above all there is a demoralizing destruction of social, moral and cultural values which are eroded by the public demonstration effect of corruption being rewarded visibly in the life style of people who generally known to be living well over their legitimate means and who appear out of reach of the judicial system. And when they are brought within the ambits of the law have the financial means to buy their way out of their temporary predicament

It is on account of the visibility of the damage that corrupt practices wreak on society and the apparent failure of the "rule of law" to discourage much less stop corrupt practices that led to the

complementary strategy of preventing corrupt practices thus encouraging non-corrupt behavior rather than engaging in a slow and frustrating effort to "fight corruption".

Objectives
1. Understand the need to study change of behaviour
2. To appreciate the reasons for the change of behaviour
3. To ascertain at what point behaviour is said to have been changed

Introduction

Making the needed changes is a function of the awareness of one's vulnerability and the access to the resources and personal authority/power to take the necessary decisions and put them into action in changing behaviour from the risky one to a non- or less risky form.

The three major reasons for changing behaviour include the recognition of a desired outcome or fear of an undesirable outcome if behaviour is not changed; the recognition or acceptance that the benefits outweigh the costs of changing behaviour; and an assessment of how relevant others feel about one changing or not changing behaviour.

5.2.1. When is Behavior Changed?

Change is always engineered by an expected outcome. Behaviour is changed when the knowledge base upon which the change process will be based has been accumulated. The skill for new behaviour also has to be is acquired before the change can take place. In addition, the resources for adopting new behaviour will need to be available to make change possible. Furthermore, the individual must be convinced that change is will be of personal benefit. And finally, the physical or social support environment for the new behaviour has to be created before change can happen.

Chapter   5.3.0   How Behaviour is Changed and Managed

> 5.3.1 How is behaviour changed?
> 5.3.2 How can change in behaviour be sustained?

Objectives
1. To explain and be able to identify how behaviour is changed
2. To understand the differences in the period of change of behaviour and why
3. To ascertain when a behaviour has changed
4. Appreciate and put to use the indicators for managing a changed behaviour

5.3.1. How is Behaviour Changed?

Some have the ability to go through a dramatic change in which there is a sudden termination of old behaviour and the immediate commencement of new behaviour. This may be described as a process of conversion. For others, the dramatic is inconceivable and change has to be in transitions. This transitional approach involves the modification of behaviour from more hazardous to less hazardous over time.

5.3.2. How can change in behaviour be sustained?

Sustaining new behaviour as pointed out earlier depends on a number of factors. Is the new behaviour grounded enough to have become a habit? Are there occasions when circumstances in one's environment draw attention and interest back to old habits? In other words, is the social environment supportive enough of the new pattern of behaviour?

Using the example of the smoking habit, campaign against entry into smoking may be powerful. But at different stages of life the peer pressure to smoke may be irresistible. In a similar way the attraction and the demonstration effect of the benefits of corruption to the perpetrators may be too strong for some to resist the temptation of entry into corrupt practices.

The tool of learning reinforcement will be employed in order for trainees to be involved to be reacquainted with the messages and contents of the prevention program.

Activity

Drawing examples from religious conversion, promotion of non-smoking participants can discuss the difficulties involved in sustaining a new habit.

The factors responsible for relapsing into old habits or reverting to old attitudes should be discussed in groups and ideas collated and presented in plenary session. Groups can include those who discuss (a) lack of supportive environment for adhering to learnt lessons, forgetting learnt lessons.

Strategies that can be employed to provide supportive environment or to avoid unsupportive environment should be discussed.

Assessment

Chapter   5.4.0   Strategy and stages of Change of Behaviour
             5.4.1   Intuitive 4-Stage Model of Behaviour Change

Objectives
   1. Understand the general concept and purpose of the 4-Stage Model of Behavioural Change
   2. Identify the Different Stages of the 4-Stage Model of Behavioural Change
   3. Have the ability to apply the 4-Stage Model of Behavioural Change
   4. Apply it to themselves individually where necessary

Chapter   5.4.1   Intuitive 4-Stage Model of Behaviour Change

There are four possible stages from the awareness of a health risk to the changing of behaviour and to practices needed to eliminate or modify the risk. Understanding the stages is a function of the level of sophistication, exposure to information and the ability to process the information. Such an adaptation called the 4-Stage Model (4SM) of Behaviour Communication Model (BCC) emerged from 12 years of HIV prevention research carried out at the Association for Reproductive and Family Health (ARFH) (Adeokun, 2014).

Applying this model to the prevention of Corruption means that the process of the development of the model must be presented so that there is clarity as to how they contribute stage by stage to the concern about a line of current behaviour and change to a less damaging pattern of behaviour.

Stage 1 Awareness of the Problem
This is the stage where the participant(s) are meant to familiarize themselves with the problem with the behaviour that is in need of change. Just as in Public Health, the recognition of the social, economic and other hazards associated with the pervasive corrupt practices and behaviour observable in the country is the first stage of confronting the public with the hazard or danger of not controlling and preventing corruption. The corrupt individual is mostly aware of the pleasure and gains of corrupt habit but the corrupt person is not aware or ignores the suffering of others arising from such habit.

Activity
• Identify the social, economic and other hazards associated with corruption • Discuss the awareness level of people involved both from the point of view of beneficiary of corrupt practices and the loosing stakeholders including the national loss arising from such practices • Allow trainees to illustrate with anecdotes if available

Stage 2 - Risk Assessment and Personal Interpretation of Cost and Benefit
This is the stage where the severity and consequences of the corrupt habit or behaviour is exposed to the participant(s) or corrupt person(s). The question to answer here is whether the whole population and subgroups in the country are at any risk from the impact of corrupt habit or behaviour? Most participant(s) or corrupt person(s) are unaware of even the personal risk they face.

Activity
• Make a distinction between individual and group or national risk assessment of the impact of corrupt practices and the benefits and costs of corruption prevention as well. • Ask for the frequency participants encounter occasions of being drawn into corrupt practices and the strategy employed the temptation to collude. • Ask for personal views of the trainees on the seriousness and the moral values of different impacts of corrupt practices

Stage 3 - Information on how to reduce the risk of the cause and effect of the adverse impact of corrupt practices and attempts to prevent corruption.
Familiarity with agents, their location and methods for effecting change is a precondition for participation in activities and services available for corruption prevention. Services available for preventing persistent corrupt practices or getting involved in entry into such practices. There must be the conviction that the efforts to adopt corruption prevention are worth the inconveniences of changing one's habit or attitude to corruption.

Stage 4 – Personal power to effect decision
The uneven power relations between perpetrators of corrupt practice and the direct and indirect victim slows down the implementation of planned change of previous behaviour and the adoption of prevention practices. The weaker party can often undermine the goals of the superior using subterfuge that slows down the process of corruption or facilitates its aggravation.

Activity
Group discussion approach could be carried out on the unequal power relations between different actors in corrupt practices. The power to resist involvement in corrupt practices can

be reduced by desperation of the supplicant – application for employment; request for documents in short supply; falling short of fulfilling conditions for access to some services places people in a powerless position; people in higher authority can compel participation in corruption.
1. Options for negotiating a more even power relations should also be discussed.
2. Focus group method
3. Drama sketches to bring discussions to life and make scenarios more realistic

Assessment
Evaluation of learning can be done with traditional Questions and Answers or the use of the debate format to address aspects of learning content.

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Chapter 5.5.0   Operant Conditioning

General Learning objectives
The aim of this module is to utilize Skinner's operant conditioning theory to:
- Show participants that the best way to understand a behavior is to look at the causes of an action and its consequences
- Highlight to participants that corrupt behavior that are reinforced will tend to continue
- Highlight to participants that corrupt behavior that are punished effectively will eventually end or diminish gradually
- Explore through case studies positive/negative reinforcers and punishment of corrupt behavior in Nigeria

5.5.0 Operant Conditioning
The term "operant conditioning" originated by the behaviorist B. F. Skinner, who believed that one should focus on the external, observable causes of behavior (rather than try to unpack the internal thoughts and motivations) Reinforcement comes in two forms: positive and negative. We will explain this below.

5.5.1 Positive and negative reinforces punishment
- Positive reinforcers are favorable events or outcomes that are given to the individual after the desired behavior. This may come in the form of praise, rewards, etc.

- Negative reinforcers typically are characterized by the removal of an undesired or unpleasant outcome after the desired behavior. A response is strengthened as something considered negative is removed.

The goal in both of these cases of reinforcement is for the behavior to increase.

Positive and negative punishment

Punishment, in contrast, is when the increase of something undesirable attempts to cause a decrease in the behavior that follows.

- Positive punishment is when unfavorable events or outcomes are given in order to weaken the response that follows.
- Negative punishment is characterized by when an favorable event or outcome is removed after a undesired behavior occurs.

The goal in both of these cases of punishment is for a behavior to decrease.

B.F. Skinner (1938) coined the term operant conditioning; it means roughly changing of behavior by the use of reinforcement which is given after the desired response. Skinner identified three types of responses or operant that can follow behavior.

• **Neutral operants**: responses from the environment that neither increase nor decrease the probability of a behavior being repeated.

• **Reinforcers**: Responses from the environment that increase the probability of a behavior being repeated. Reinforcers can be either positive or negative.

• **Punishers**: Responses from the environment that decrease the likelihood of a behavior being repeated. Punishment weakens behavior.

We can all think of examples of how our own behavior has been affected by reinforcers and punishers. As a child you probably tried out a number of behaviors and learned from their consequences.

For example, if when you were younger you tried smoking at school, and the chief consequence was that you got in with the crowd you always wanted to hang out with, you would have been positively reinforced (i.e. rewarded) and would be likely to repeat the behavior.

If, however, the main consequence was that you were caught, caned, suspended from school and your parents became involved you would most certainly have been punished, and you would consequently be much less likely to smoke now.

Positive Reinforcement

Skinner showed how positive reinforcement worked by placing a hungry rat in his Skinner box. The box contained a lever on the side and as the rat moved about the box it would accidentally knock the lever. Immediately it did so a food pellet would drop into a container next to the lever. The rats quickly learned to go straight to the lever after a few times of being put in the box. The consequence of receiving food if they pressed the lever ensured that they would repeat the action again and again.

Positive reinforcement strengthens a behavior by providing a consequence an individual finds rewarding. For example, if your teacher gives you £5 each time you complete your homework (i.e. a reward) you will be more likely to repeat this behavior in the future, thus strengthening the behavior of completing your homework.

Negative Reinforcement

The removal of an unpleasant reinforcer can also strengthen behavior. This is known as negative reinforcement because it is the removal of an adverse stimulus which is 'rewarding' to the animal

or person. Negative reinforcement strengthens behavior because it stops or removes an unpleasant experience.

For example, if you do not complete your homework, you give your teacher N500. You will complete your homework to avoid paying N500 thus strengthening the behavior of completing your homework.

Skinner showed how negative reinforcement worked by placing a rat in his Skinner box and then subjecting it to an unpleasant electric current which caused it some discomfort. As the rat moved about the box it would accidentally knock the lever. Immediately it did so the electric current would be switched off. The rats quickly learned to go straight to the lever after a few times of being put in the box. The consequence of escaping the electric current ensured that they would repeat the action again and again.

In fact Skinner even taught the rats to avoid the electric current by turning on a light just before the electric current came on. The rats soon learned to press the lever when the light came on because they knew that this would stop the electric current being switched on.

These two learned responses are known as *Escape Learning* and *Avoidance Learning*.

Punishment (weakens behavior)

Punishment is defined as the opposite of reinforcement since it is designed to weaken or eliminate a response rather than increase it. It is an aversive event that decreases the behavior that it follows Like reinforcement, punishment can work either by directly applying an unpleasant stimulus like a shock after a response or by removing a potentially rewarding stimulus, for instance, deducting someone's pocket money to punish undesirable behavior.

Note: It is not always easy to distinguish between punishment and negative reinforcement.

There are many problems with using punishment, such as:

- Punished behavior is not forgotten, it's suppressed - behavior returns when punishment is no longer present.
- Causes increased aggression - shows that aggression is a way to cope with problems.
- Creates fear that can generalize to undesirable behaviors, e.g., fear of school.
- Does not necessarily guide toward desired behavior - reinforcement tells you what to do, punishment only tells you what not to do.

5.5.2 Schedules of Reinforcement

Imagine a rat in a "Skinner box". In operant conditioning if no food pellet is delivered immediately after the lever is pressed then after several attempts the rat stops pressing the lever (how long would someone continue to go to work if their employer stopped paying them?). The behavior has been extinguished.

Behaviorists discovered that different patterns (or schedules) of reinforcement had different effects on the speed of learning and on extinction. Ferster and Skinner (1957) devised different ways of delivering reinforcement, and found that this had effects on

1. **The Response Rate** - The rate at which the rat pressed the lever (i.e. how hard the rat worked).

2. **The Extinction Rate** - The rate at which lever pressing dies out (i.e. how soon the rat gave up).
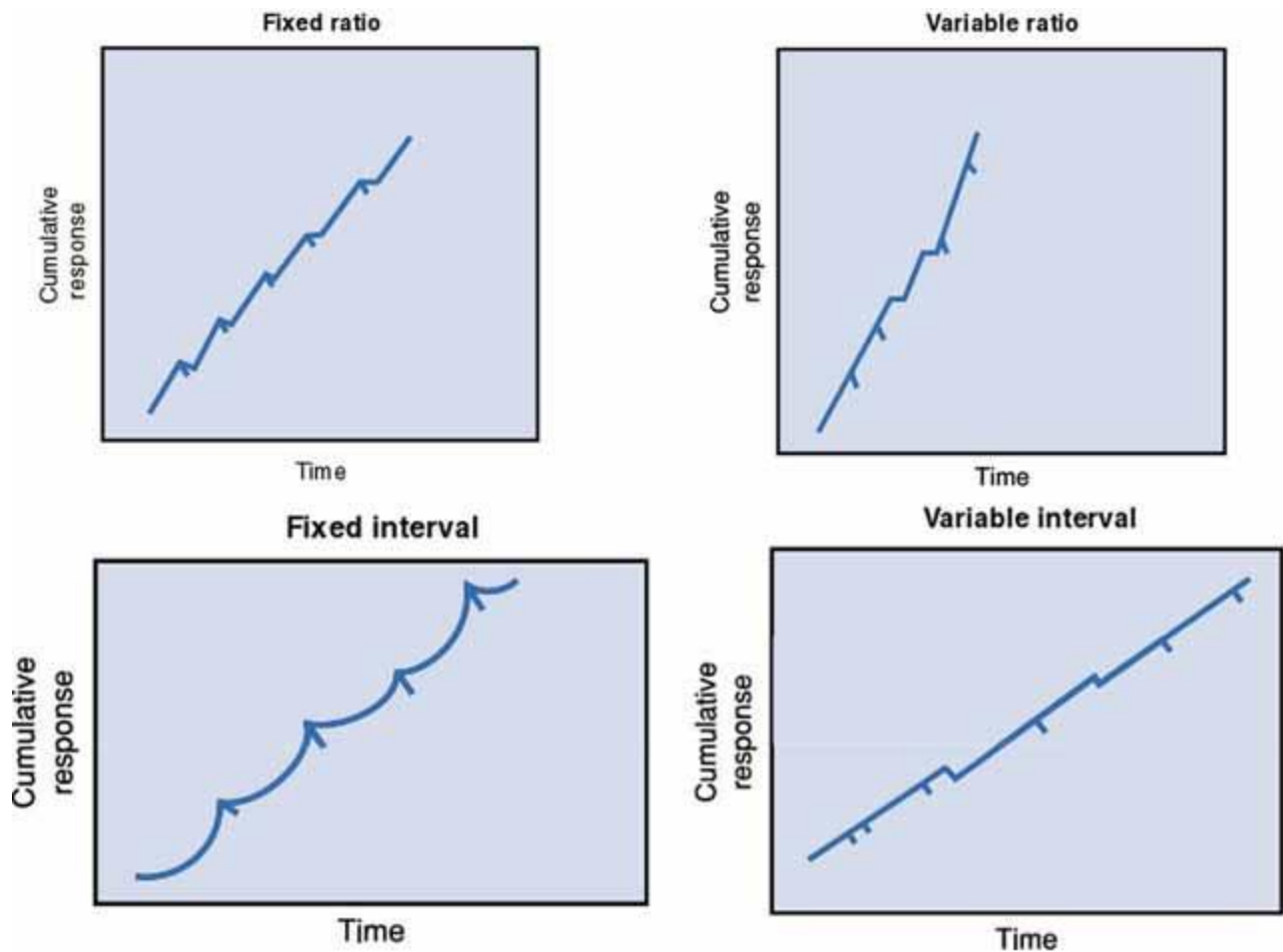
Skinner found that the type of reinforcement which produces the slowest rate of extinction (i.e. people will go on repeating the behavior for the longest time without reinforcement) is variable-ratio reinforcement. The type of reinforcement which has the quickest rate of extinction is continuous reinforcement.

(A) Continuous Reinforcement

An animal/human is positively reinforced every time a specific behaviour occurs, e.g. every time a lever is pressed a pellet is delivered and then food delivery is shut off.

- Response rate is SLOW
- Extinction rate is FAST

(B) Fixed Ratio Reinforcement

Behavior is reinforced only after the behavior occurs a specified number of times. E.g. one reinforcement is given after every so many correct responses, e.g. after every 5th response. For example a child receives a star for every five words spelt correctly.

- Response rate is FAST
- Extinction rate is MEDIUM

(C) Fixed Interval Reinforcement

One reinforcement is given after a fixed time interval providing at least one correct response has been made. An example is being paid by the hour. Another example would be every 15 minutes (half hour, hour, etc.) a pellet is delivered (providing at least one lever press has been made) then food delivery is shut off.

- Response rate is MEDIUM
- Extinction rate is MEDIUM

(D) Variable Ratio Reinforcement
Behavior is reinforced after an unpredictable number of times. For examples gambling or fishing.
- Response rate is FAST
- Extinction rate is SLOW (very hard to extinguish because of unpredictability)

(E) Variable Interval Reinforcement
Providing one correct response has been made, reinforcement is given after an unpredictable amount of time has passed, e.g. on average every 5 minutes. An example is a self-employed person being paid at unpredictable times.
- Response rate is FAST
- Extinction rate is SLOW

Case study

Scenario 1.
The inspector-General of Police has complained bitterly about the menace of bribery and extortion of money among the rank and file officers of the NPF. More worrisome to him is the incidence of illegal road blocks mounted by some deviant police officers to extort money from road users. The officers who engages in this act often adduce lack of adequate welfare for engaging in such behavior meanwhile majority of road users believe that this act is precipitated on the willingness of road users to offer bribe when demanded. As a measure of preventing this corrupt behavior, the NPF IG established the IG monitoring team to routinely check the highways, arrest and report any erring policeman found guilty of this act. The IG monitoring team is spread across the 36 states of the federation and claimed that they have made considerable arrest since their inauguration, however most Nigerians seems not to believe this assertion as they claim that the situation has not abated.

Scenario 2.
The Permanent secretary, Ministry of Automobile suddenly discovered the high rate of absenteeism in his ministry he confers with his top directors on the suitable way of managing the situation. The director of human resources advises that that the PS should issue query to all the staff concerned and publish their names on the notice board for bad labelling. The director of finance position differs strikingly with his colleagues, in his opinion he advised the PS to give monetary reward to those staff who are prompt in their duty and reward them with double promotion.

Activity:
1. Discuss scenario 1 & 2 in the light of positive and negative reinforcer of behavior
2. Your office is exploring partnering with National Orientation Agency to design a National programme that will focus on behavioral and attitudinal change as ways of preventing corruption in Nigeria. Against the background that corruption is an opportunistic behavior what elements of positive and negative reinforcer would you recommend as a way of preventing corruption in Nigeria?

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MODULE 6:0   PROJECT DESIGN AND IMPLEMENTATION

Chapter   6.1.0   What is a project?
           6.2.0   Project identification
           6.3.0   Project formulation
           6.4.0   Implementation planning
           6.5.0   Planning of monitoring and evaluation

General Learning Objectives
   1. Design good, inclusive and sustainable project proposals using the Project Cycle
      Management and the Logical Framework approach applied to the context of comparative
      development.
   2. Understand and apply the core principles that should underlie any project in order for it to
      be viable and sustainable.
   3. Develop a project idea on the basis of real needs and required resources, and transpose the
      idea into an implementation plan and budget.
   4. Develop a monitoring and evaluation plan that incorporates a process for checking and
      correcting project implementation, as well as the assessment of achievements.
   5. Assess project proposals submitted by anti-corruption agencies and provide
      recommendations for revision

Chapter   6.1.0   What is a project?
           6.1.1   How is a project designed?
           6.1.2   Presentation of the case study

Objectives
   ✓ Understand what a project means
   ✓ Understand the ingredients required to design a project
   ✓ Have a clear idea on how to design a project
   ✓ Be able to develop a project from a case study

Module 6.1.0 What is a project?

A project can cover a wide range of operations, from small initiatives to complex programmes.
For instance, a dairy cooperative union can run a project to introduce a computerized management
information system. This would involve purchasing computers and a software programme and
training book-keepers. A more complex programme might be setting up a national collective
investment scheme through private companies, which would involve many stakeholders (the
government, private collective investment companies, advisory services, the regulatory agencies,
etc.), take time and require substantial investment.

To be viable and sustainable, a development project, whatever its size and outreach, should be
anchored to a few essential guiding principles:
   1. The starting point of a project is the existence of a problem affecting a certain group or an
      opportunity to improve a working condition or enhance performance as in this case of this
      project
   2. A sustainable project is integrated and coherent with broader development or progress
      plans

3. A project is a participatory exercise from beginning to end and must be design in like manner
4. Sustainable projects are all encompassing and not segregatory in any form
5. A well defined project is results-based , in order words it is driven by a desired target
6. Being results-based, a project seeks clearly defined objectives or outcomes, and it includes a series of interrelated and coordinated activities
7. Whereas the problem is the project's starting point, the objectives are the end point

Activities ➤ Outputs ➤ Objectives ➤ Impact

8. Project implementation is organised with a fixed budget, limited resources and specific deadlines
9. Each project has a specific management structure
10. Any project includes a monitoring and evaluation (M&E) system
11. A project has to be sustainable; socially, financially, institutionally and environmentally

6.1.1 How is a Project Designed?

There are different approaches to project design. Many organizations use project cycle management methodology and the logical framework tool the most. In many cases, they are even mandatory. We shall consider the project cycle management method.

- **Project cycle management**

Every project has to follow a series of phases, allowing the process to be guided from the moment the problem is identified until it is solved. This series of phases is known as the **project cycle.** Project cycle management (PCM) is a results-based decision-making tool. Each phase is crucial and should be fully completed before going on to the next.Programming new projects will draw on the final evaluation in a structured process of feedback and institutional learning.
Design is the starting point of the project cycle. Project design provides the structure of what has to be achieved, how it is to be implemented and how progress will be verified. Therefore the design is the most crucial phase. Its quality will influence the following stages in the project cycle.
The project cycle management approach helps to ensure that:
➤ Projects are relevant to the real problems of the target groups and make the most of existing opportunities;
➤ Projects are feasible: objectives can be realistically achieved within the constraints of the external environment and capacities of the organization;
➤ The benefits generated by the projects are sustainable.

6.1.2 Presentation of the Case Study

CASE STUDY – Decent work promotion and income generation through capacity development in the X Dairy Cooperative

INTRODUCTION
Throughout the manual, the case study of the "X Dairy Cooperative", located in a poor rural district in a developing country, will illustrate how a project document can be developed step by step. The case is imaginary, but inspired by real life.

THE CONTEXT
The **district of Tabacounda** is located in a developing country which is slowly progressing in human development and has experienced relative economic growth and political stability over the past decade. Despite these positive national trends, the district of Tabacounda still faces a number of development challenges such as unequal distribution of income, limited access to education and health, gender inequality and high youth unemployment. Young people are inclined to migrate to urban areas and generally do not consider agriculture an attractive employment opportunity. The district economy relies mainly on agriculture and suffers from low public and private investment and poor infrastructure; half of the sector's output remains at subsistence level. Farmers frequently form cooperatives that provide mainly supply and marketing services to their members. Processing of primary produce by cooperatives is not well developed in the district.

X Cooperative is a dairy cooperative. It has 750 members, including women and young people. The members bring their milk to the cooperative's five collection centres twice a day. The collection centres transport the milk in cans to the main cooperative collection site, from which it is sold to the one and only dairy processing plant in the district. The cooperative employs a manager and an accountant. The president, vice-president and management board members are elected and do their work on a voluntary basis. All leadership and management functions are filled by men.

The X cooperative aims to alleviate poverty among its members through a sustainable increase in income from cow's-milk production. In the next chapters, we will come to understand how the cooperative can develop and implement such a plan and thereby meet members' needs and aspirations.

PROBLEMS FACED BY THE COOPERATIVE
On top of the challenges posed by the broader context, the cooperative faces problems in its interaction with other agents, and suffers from internal problems:

Livestock disease. The high incidence of livestock disease has reduced the income of dairy farmers. The lack of veterinary services and skills, as well as the impossibility of farmers getting insurance against such hardship, means that some have turned to alternative means of livelihood. This has resulted in fewer transactions between the members and the cooperative and thus in falling turnover for the cooperative.

Dormant member base. Members, especially young people, are dropping out or have become inactive, which threatens the democratic governance and economic viability of the cooperative. Will the cooperative be able to survive in the long run without young members?

Insufficient equipment. The cooperative does not have cooled storerooms nor sterilizing facilities to prevent the milk from getting spoiled. Nor does the cooperative have the equipment to produce butter, cream, yoghurt or cheese. Accordingly, the cooperative misses out on income-generating opportunities.

Inadequate management, entrepreneurial and technical skills. X is highly dependent on its main buyer and has not ventured into additional business opportunities or diversification of activities. Its management board is not sufficiently versed in business management and entrepreneurship. Members' technical skills in production of milk products are not well developed.

Gender and youth inequality. The declining income for dairy farmers particularly affects women and young members, who have fewer qualifications and generally face more difficulties in accessing business services. Women lack assets due to the inheritance law. Young people also have difficulty obtaining credit. Furthermore, despite their efforts, women and young people are not represented in cooperative leadership and management functions such as the management board and committees.

Limited social investment. The cooperative used to invest in the social well-being of its members and their communities by financing health centres, school fees and the rehabilitation of farm-to-market roads. Due to the lack of surplus generated by the cooperative, members cannot decide to invest in such projects any more.

STAKEHOLDERS INVOLVED

Several players in the district are concerned by the performance of the X cooperative, among them:
- the members, in particular the women and young cattle farmers and their households as well as the cooperative leaders;
- the employees of the cooperative (the manager and the accountant);
- the dairy processing plant, the local supermarkets, and other enterprises involved in the dairy value chain;
- the communities where economic activity and social well-being is influenced by the cooperative, including youth who are not members of the cooperative and seek for income generating activities;
- the Tabacounda vocational training centre, which is a branch of the Cooperative College in the capital, is responsible for providing training programmes to cooperative members, managers and leaders on cooperative education, technical skills as well as cooperative management and entrepreneurship training;
- the microfinance institutions, including saving and credit cooperatives, which wish to expand and diversify their client/user portfolio;
- the local government, which is responsible for implementing the district regulatory framework and providing basic services and infrastructure to the population;
- the Ministries of Agriculture, Industry and Commerce and of Health, which, through their local departments or through the local government, should guarantee equal access to their services and promote the socio-economic development of the district;
- the national union of dairy cooperatives, which provides business services to its primary society members and is a member of the national confederation of cooperatives;
- the national confederation of cooperatives, which seeks to promote the sustainable development of cooperatives and to voice cooperative interests at the national policy level, as well as internationally through its membership of the International Co-operative Alliance

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Assessment:
- What are the characteristics of a project?
- What are the advantages of a project cycle management?

Chapter   **6.2.0 Project identification**
6.2.1 Conducting a stakeholder analysis and selecting your target group
6.2.2 Analyzing the problem
6.2.3 Analyzing the objectives
6.2.4 Selecting your strategy

Objectives
- ✓ Have the ability to identify a project clearly in specifics
- ✓ Be able to conduct a stakeholder analysis on the group the project is targeted at
- ✓ Successfully run an analysis of the problem in the project
- ✓ Successfully run an analysis of the objectives
- ✓ Be able to select strategies of executing an identified project

6.2.0   Project identification

Introduction
The first step in the design phase (Phase 1 of the PCM cycle) is the **identification** of your project. The methodology used is called **situation analysis**. It consists of a series of tools that allow you to develop your project idea. It is the most important component of the project cycle because it facilitates the anchoring of the project activities to needs and priorities of the target group.

At the same time, it is crucial to conduct it in the wider framework of international and national priorities to which the project aims to contribute in the long term.

Analyzing the situation **in the framework of international, national and local priorities**:
- Helps to identify the nature and magnitude of needs, prioritise them and establish the first criteria for developing the project idea;
- Can be used by the project team as an institutional reference and starting point for the specific project's situation analysis;
- Helps to map the relationships among all those involved and to create a sense of ownership of the project and its future development;
- Improves the whole project proposal in terms of sustainability, and emphasises how the project is part of a wider strategy.

Several tools exist for a situation analysis. To prepare a results-based project, the following will have to be done:
1. Stakeholder analysis and target group selection
2. Problem analysis
3. Objective analysis
4. Alternative selection

6.2.1.   Conducting a Stakeholder Analysis and Selecting your Target Group
Starting the project design by analyzing the stakeholders and their context helps ensure that the project is adapted to the cooperatives' needs and capacities. But in many cases it is useful to start with the problem in order to identify all the stakeholders concerned.

The focus of a results-based project is the target group. Since the project also aims at achieving sustainability, in addition to the target group, other players have to be considered at this stage, by understanding their potential role in the project and their interests and expectations in terms of benefits. Right at the beginning, it is therefore necessary to identify all the stakeholders likely to be affected (either positively or negatively) by the project and analyse their potential involvement in it. The stakeholders are 'not only the people and institutions that carry out the project, but also those structures and cooperative organizations that play a role in the project environment'.

6.2.1.1. Methodology

As the first action in the project design process, people in charge of the project design can get organized into a group. This group is usually chosen when the first project idea emerges and – if implementation is confirmed – it could support the identification of the project team (including members of the design team). The main task of the project team is to coordinate the whole process

and the project implementation. This does not mean that they are alone in carrying out the activities, but that they are accountable for them.

In the ideal case, the project should be designed using participatory planning methods which actively involve the cooperative members. For instance, a project design workshop combined with a series of brainstorming sessions, individual meetings, focus group discussions are very useful. Indeed, one single workshop often facilitates the prevailing of dominant positions, based on power, leadership and influence, whereas small group discussions allow better reflection, better participation by women and more inclusive plans, and generate stronger ownership by the members. In some cases, the capacities of less experienced stakeholders need to be reinforced. In other cases, stakeholders may abuse their power, and cooperative stakeholders might not be allowed to speak freely in front of them. This can also be due to a lack of capacity in participatory and inter-active methods.

Although in practice this variety of participation and ownership rarely happens, due to many different factors, in the case of cooperatives, the team can build on consultation and management processes within the cooperative's governing mechanisms (such as for instance the general assembly, supervisory and working committees) The project team must bear in mind that there is a direct relationship between **participation** and **sustainability**, and should be aware of the risks of exclusive processes.

6.2.1.2. Stakeholder Matrix

Different tools can be used to conduct a stakeholder analysis. One such is the stakeholder matrix. Having identified the core problem, you need to ask **WHO** these problems actually affect most, and what the characteristics and interests of different stakeholders might be in tackling the problems and finding solutions.

The main objectives of the stakeholder matrix are to:
understand the interests of different groups and their capacity to tackle the core problem; and design activities that appropriately address institutional capacity and social issues.

It is highly recommended that a second stakeholder analysis is done once the project design has been finalized in order to agree on the groups who will benefit and contribute to getting the desired results.

The type of information presented can be adapted to the different needs of a situation analysis. Additional columns can be added to deal specifically with the different interests of men and women, such as motivation to bring change" and "power and influence.

<u>**Key actions in developing a stakeholder matrix:**</u>
1. Identify the **core problem of the cooperative** being addressed.
2. Identify **all those groups** affected positively or negatively by the problem.
3. Investigate their respective **characteristics and capacities.**
4. Identify their different **interests and expectations** in resolving the core problem (positive or negative).

Example

Let's take an X cooperative case study, the key stakeholders directly concerned by the core problem (*the declining income of the cooperative members, particularly its women and young cattle farmers*) are presented in the following matrix, together with their main characteristics, capacities, interests and expectations, and the implications for planning. The list of characteristics is not exhaustive, but it highlights the elements which affect the project design.

Stakeholders	Characteristics/Capabilities	Interest/ Expectations	Implications for Planning
Co-operative Members (X)	1. Nearly 60% have an income below the national minimum wage. 2. ………………	1. To improve their livelihood. 2. ………………… ….	1. Capacity building needed especially of women and young members. 2. ……………… …

6.2.1.3. Selecting the Target Group

The target group is a group of people who will benefit from the project. Within the stakeholder analysis, the target group analysis is of particular relevance and requires special attention.

In most projects, organizations will not deliver direct services to persons, but run services that build the capacities of organizations so they can provide new or better services to a certain group of people. We therefore need to distinguish between the **direct recipients** of project outputs or services and the **ultimate beneficiaries**.

The **direct recipients** are **those who are directly affected by the core problem, and who will benefit from the project outputs and services**. The **ultimate beneficiaries are those who will benefit from the project in the long term**. During project design, it is particularly important to assess the **capacity of the direct recipients** carefully: are they really committed, do they have the resources (time, staff, etc.) to participate in the project, and do they have the capacity to play their role in the project? Building up the capacity of the target groups is crucial not only to achieving the project's objectives and outputs, but also to ensuring that the benefits are sustained once the project ends.

Target group:
Those benefiting from the project. You can distinguish between:
- *direct recipients (or direct beneficiaries):* the group/institutions who will be directly affected by the project at the level of the outputs, e.g. an institution, a community, ministry or agency of government or an organization;
- *ultimate beneficiaries:* those who benefit from the project's development objective (such as local food security) in the long term, e.g. family of the direct recipients, consumers and clients of products and services provided by such institutions, ministry or agency.

Project partners: Support and participate in the design and implementation of the project. They can be part of the project's Steering Committee, e.g. Ministries, civil societies, trade unions, employers' organizations, cooperative support agencies.

6.2.1.4. Analyzing the Target Group: A Strength, Weakness, Opportunities and Threats (SWOT) Analysis

As a parallel process in the analysis of the situation, a **self-diagnosis of the capacity of the direct recipient** to carry out the proposed project needs to be done through the analysis of the cooperative's or cooperative support organization's strengths and weaknesses, as well as the opportunities and threats in the external environment (a SWOT analysis). The SWOT analysis is a powerful tool for carrying out a diagnosis of the target group. It can be used to complement and enrich the stakeholder analysis.

A SWOT analysis examines both the internal and the external situation of the target group and partners. Therefore it is particularly useful in projects where the target group's capacities might have a big influence on the achievement of the objectives, or when there are external elements in the context of the target group's capacities that can affect the project.

In a nutshell, a SWOT analysis can reveal the capacity of the target group and the implementation partners to perform their roles, as well as their comparative advantages. It can also show hidden obstacles to a potential project.

Strengths and weaknesses

Strengths and weaknesses are internal features of the organization that facilitate or hinder its ability to achieve certain results. Strengths and weaknesses are always relative to a certain goal. Therefore, when used for internal analysis of the applicant and partners, strengths and weaknesses analysis must concentrate on those features that can be positive or negative for participating in the project and providing and sustaining quality services to the target group.

When the SWOT analysis highlights a lack of capacities on the part of the applicant to perform all the activities listed in the project, the organization must find other partners among the stakeholders who can fill the capacity gaps.

Strengths and weaknesses can be modified to some extent by the project. Project designers should include measures to consolidate the key strengths and overcome critical weaknesses of the stakeholders, particularly ones that could compromise the sustainability of the project results. A good project strategy takes as much advantage as possible of stakeholders' strengths. It is also important to take measures to neutralize the impact of weaknesses.

Opportunities and threats

Threats and opportunities are factors in the context outside the cooperative or cooperative support organization that can trigger events which affect the organization's ability to achieve certain results. Unlike strengths and weaknesses, threats and opportunities cannot be manipulated, since they are beyond the control of the organization. What the organization can do is develop strategies to maximize its ability to take advantage of the opportunities and to minimize any impact of the threats.

Threats and opportunities are identified during project design. In this way, the project strategy can include measures to benefit from the opportunities. In addition, the strategy can include preventive action to lessen the negative effects of threats. Such measures would help to bring the negative effects down to an acceptable level at which the success of the project is not compromised.

Key actions in conducting a SWOT analysis
1) Using the matrix below, ask the target group, such as cooperative members or staff, to brain-storm on the following question: "What are the **internal strengths** within your cooperative (or cooperative support organization) that could affect the problem you want to solve?"
2) Identify your **internal weaknesses** that may prevent you to from solving the core problem.
3) Brainstorm on external **opportunities** beyond your control that could have a positive impact on solving the core problem.
4) Identify **threats** in the external environment that might hinder your efforts to solve the core problem.
5) Develop an **overall strategy**. This information can be used to help develop a strategy that uses the strengths and opportunities to reduce the weaknesses and threats, and to achieve the objectives of the organization. Internal weakness will have to be turned into positive results to be achieved while emphasising the strengths and opportunities.
The following questions can guide the discussion:
   • How can the cooperative use and capitalise on each strength?
   • How can the cooperative remedy each weakness?
   • How can the cooperative exploit and benefit from each opportunity?
   • How can the cooperative mitigate each threat?
Source: adapted from *ITC/ILO, 2009, Strategic planning: At the core of sustainable development. DELNET training course on disaster risk management and sustainable local development, ITC/ILO, Turin*

6.2.2   Analyzing the problem

Every project aims to help solve a problem that affects the target group or groups. The problem analysis identifies the negative aspects of an existing situation and establishes the "**cause and effect**" relationships among the problems that exist. The core problem of the target group must be clearly identified. It is essential to understand the root causes of the problem and the effects the problem has on the beneficiaries. This can be represented diagrammatically by constructing a problem tree. The causes are structured by clustering similar ones and by developing a hierarchy of causes.

The problem tree has three different components:

6.2.2.1 The Core Problem
The core problem must be the starting point for every project. It provides the rationale and gives it meaning, in that it aims to make a significant contribution to solving a relevant problem for the target group. If the starting point for the project is a detected opportunity, then it is still important to identify the main problem (or challenge) hindering the desired situation from becoming reality. So, regardless of our initial positive or negative considerations when looking at the existing situation, we will always end up identifying the core problem (or challenge) to tackle.

6.2.2.2 The cause of the Core Problem
Each problem has its own history, and we have to find out what underlying factors (causes) have led to the current situation. Once identified, the **causes (roots) of the core problem** are located under the core problem:
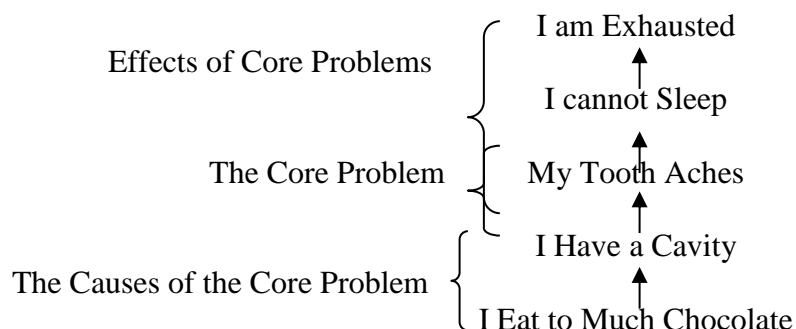
The core problem is my toothache. Usually we stop at the first level of the cause, just going to the dentist to remove the caries. But it is a short-term solution, since the root of the problem was not tackled. I therefore need to ask all the relevant questions and make the cause-and-effect links, then change my dietary habits and solve the core problem in the long term.

The key purpose of this analysis is therefore to make sure that all the "root causes" are identified and subsequently addressed in the structure of the project, not just the "symptoms" of the problem. The key to a successful project is to tackle the causes of the core problem. Unless we do that, the problem will arise again.

6.2.2.3 The Effects of the Core Problems

The cause-and-effect chain can also be continued beyond the core problem. In this case, the chain forms the set of events that are the **effects of the core problem.** All problems or needs are embedded in a social, political or environmental context and are often systemically linked to other needs. Therefore, anything affecting one area also interacts with others parts of the system. The core problem generates consequences or other problems. The effects of the core problem are in the form of more general social, environmental, political or economic conditions (usually negative) that result from the problem. They are placed on top of the core problem.

Illustration:

Effects of Core Problems
- I am Exhausted
- ↑
- I cannot Sleep
- ↑

The Core Problem
- My Tooth Aches
- ↑

The Causes of the Core Problem
- I Have a Cavity
- ↑
- I Eat to Much Chocolate

6.2.2.4 Building a Problem Tree

Key actions in building a problem tree:
1) Organise a participatory workshop, discussions and meetings with the target group and all the relevant stakeholders, paying particular attention to the ability of different groups (e.g. women or youth) to participate and voice their issues.
2) Starting with the core problem the project team identified at the beginning of the situation analysis, openly **brainstorm on problems and their causes** which stakeholders consider to be a priority. Each participant could write a problem on a card. All the problems will then be posted on a wall or flipchart.
3) Use the problems identified through the brainstorming exercise to reformulate the core problem and then begin to establish a **hierarchy of causes and effects,** as illustrated in Diagram below:

Hierarchy of causes and effects

Problems which are direct _effects_ of the core problem are put above it { Effect 1 → Effect 2

Core Problem

Problems which are directly _causing_ the core problem are put below it { Cause 1, Cause 2, Cause 3

Cause 1.1, Cause 2.1, Cause 3.1

WHY?
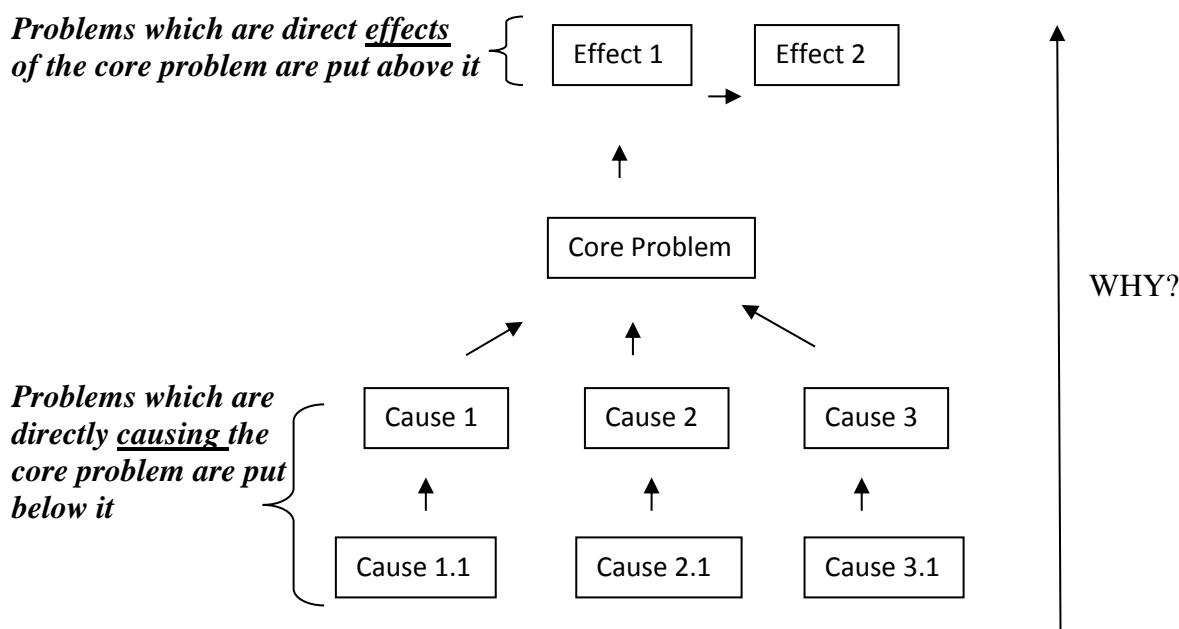
4) All other identified problems are sorted in the same way. The guiding question is "**WHY?**" More causes can be added

5) Connect the problems with cause-effect arrows

6) Look at the problem tree and verify its cause-effect links

Source: European Commission, 2004, Aid Delivery Methods, Volume 1: Project cycle management guidelines, EC, Brussels

6.2.3.   Analyzing the objectives

The analysis of objectives is a participatory approach used to describe the situation in the future once problems have been resolved, and to illustrate the **means-end** relationships in the diagram. The negative situations on the **problem tree** are converted into solutions, expressed as positive achievements on the **objective tree**. The core objective or the desired situation will be at the heart of the objective tree, the effect on top of it and the causes, which should be results, underneath.

Like the problem tree exercise, the objective tree should be developed through a consultative workshop, ideally with the same stakeholders. The stakeholder and internal analyses should also be taken into account while assessing how realistic the achievement of some objectives is and also identifying other means necessary to achieve the desired end. Like the problem tree, the objective tree has three main components:

6.2.3.1 The Desired Situation
This corresponds to the core problem on the problem tree transformed into a positive statement. The desired situation represents the real change that the project will achieve. In accordance with results-based management, the desired situation describes a result and refers to a change in the target group and the impact (above the desired situation) on the ultimate beneficiaries.

Example:

Core Problem: Yam Production is Low ⟶ Desired Situation: Higher Yam Production

6.2.3.2 The Means to Achieve the Desired Situation
The objective tree includes all the necessary and sufficient situations (also called means or objectives) that are necessary to obtain the desired situation. On the objective tree, objectives are graphically connected to each other based on means-end logic. The result is a visual model (see Diagram 9) that shows how the desired situation can be brought about.

6.2.3.3 The Desired Situation Impacts
In the problem tree, the main problem was also the cause of other problems: these are called "problem impacts". Correspondingly, the desired situation is the means to achieve positive situations that contribute to tackling the problem's effects. These positive situations are called "desired situation impacts".

An impact can be "poverty reduced in the region", "young people have decent employment in district X", etc. It is important to note that your project (the desired situation it aims to achieve) will only **contribute** to the long-term impacts. Other projects will need to be implemented, by other partners, to actually achieve long-term impacts.

6.2.3.4 Building the Objective Tree

Key actions in building an objective tree:
1) Reformulate all negative situations from the problems analysis into positive situationsthat are desirable and realistically achievable.
2) Check the means-ends relationships to ensure the validity and completeness of the hierarchy (cause-effect relationships are turned into means-ends links).
3) Check assumptions of equity. Will everyone involved really benefit or will some groups have more access to benefits than others?
4) The guiding question is **"HOW"**?

Diagram: Objective tree
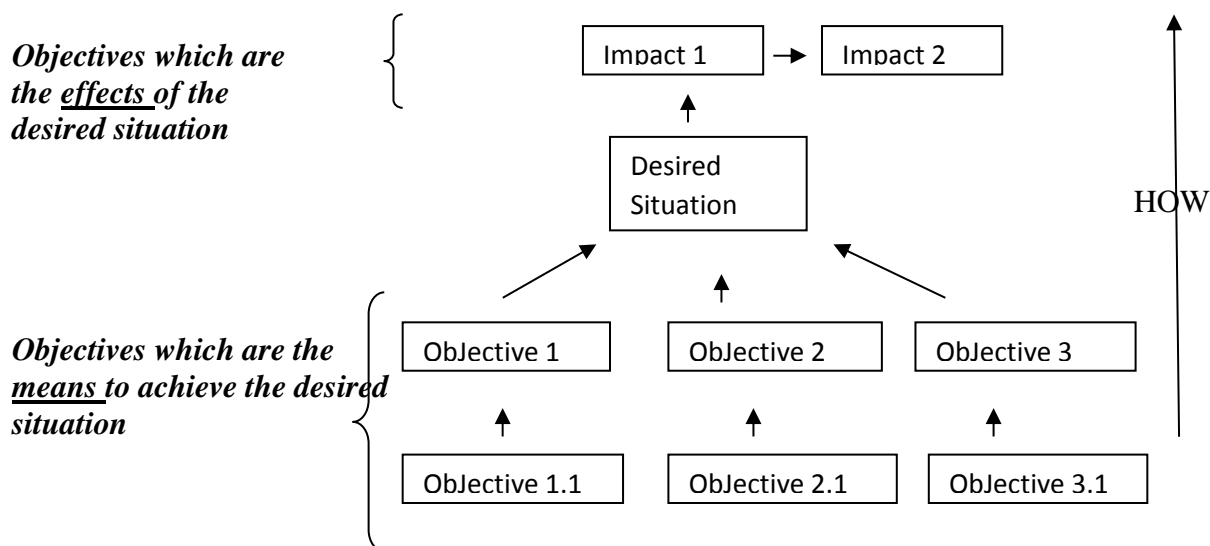
5) If necessary: revise statements, add new objectives and delete the ones which do not seem suitable or necessary.

Some problems cannot be transformed into realistic objectives. "Strong typhoons during the rainy season" cannot become "reduction in typhoons". This problem is beyond the control of the project. But if it has a strong influence on the achievement of the desired situation (destroying the crops in an agricultural project, for example), then the problem will need to be kept. At a later stage, once the project is formulated, this problem could be added to the list of assumptions. The project managers will probably have to think of measures to take to cope with the typhoons, like building protection walls or protecting dikes.

6.2.4. Selecting your strategy

Once your objective tree has been finalised, you have to select the **project strategy,** which is the final step in the situation analysis. It implies the selection of the strategy that will be used to achieve the desired objectives. It involves deciding what objectives will be included in the project and what objectives will remain outside it. You need to set clear criteria for making the choice. The criteria have to be chosen and agreed upon by all the stakeholders.

Example:

Benefits to the target group	Priority/Urgency Equity (by sex, age, socio-economic situation) Level of Participation
Feasibility (*could use the SWOT analysis already done*)	Financially and Economically Technical Human Resources Duration of Implementation
Link with stakeholders policy	Consistent with the organization or cooperative strategic plan Fit with Mandate Consistent with National/Official Strategies Compatibility with potential donors priorities
Sustainability	Of the benefits Ability to repair and maintain assets or programs Environmental impact

In most cases, a single project cannot address all the objectives necessary to solve the problem fully. The project team must therefore use the objective analysis to choose the strategy that can make the most significant contribution to solving the problem.

In this regard, recalling the core principles stated in the previous sub module, the uniqueness of each project has also to be seen in the light of the multiplicity of actions and strategies that characterise each territory, community and potentially each cooperative. The success or failure of each and every project will also depend on the synergy that its management team creates with other, complementary initiatives. For example, the objective of an agricultural cooperative is to

improve its members' production by ensuring compliance with quality standards at all levels of the production process. The cooperative will need to monitor a variety of factors, for instance physical assets (soil, water, seeds, fertilizer, pesticides, etc.), processing techniques, work place practice (hygiene), storage, packaging, time management and transport conditions. One single project is unlikely to cover all these aspects and, in this case, cooperative support organizations should be able to detect and promote parallel initiatives that can converge on a common objective. This type of synergy should already be visible at the early stage of the situation analysis.

Activity:
The trainer can use any of the examples in the module, amend the scenario and ask the participants to follow the example and identify clearly a project from the modified scenario
Assessment:
• What is SWOT? Why is so important an acronym?   • Participants to discuss what a stakeholder analysis should contain   • State the procedure in selecting a strategy

Chapter   6.3.0   Project formulation
         6.3.1   Building your logical framework
         6.3.2   Setting the objectives, outputs and activities: first column
         6.3.3   Setting up the indicators and means of verification: second and third column
         6.3.4   Setting up the key assumptions
Objectives
    ✓ Understand the factors to consider in formulating a project
    ✓ Be able to build a logical framework of a project
    ✓ Be able to design objectives, activities and indicators using the modeled table
    ✓ Be able to generate realistic assumptions and prepare sufficiently in executing a project

Chapter   6.3.0   Project formulation

Module Introduction

The formulation step is based on the understanding gained during the situation analysis, which both justifies and drives the project identification. At the same time, it sets out the benefits the intended action will bring to the target group.

The logical framework has proved to be the most useful and effective tool with which to formulate the project. The outputs of your stakeholder, problem, objective and alternative analyses are the core ingredients of your project frame, called the logical framework matrix (or logframe). Once completed, it will show, in a clear and organised manner, <u>what must be achieved, how it will be achieved, with what resources, and in which timeframe (implementation planning)</u>.

Recalling the example on Tooth (i.e. My tooth hurts / I cannot sleep / I am exhausted), the logical framework matrix will organise a step-by-step solution to the main problem, by answering a series of operational questions that target its root causes. If the solution to the fact that my tooth hurts (main problem) is that I go to the dentist, in order to make things happen as I wish, I will have to find a practical response to the following questions: who is the nearest and best affordable dentist?

When can I have an appointment? How much does the treatment cost? Do I have the money for it and, if not, how do I get it? Etc. This series of operations, if successfully carried out, will bring me to the desired situation (my tooth will not hurt, therefore I will be able to sleep and I will not be exhausted).

Applied to more complex scenarios, the purpose of a project formulation is to come up with the best possible operational way to deal with the core problem affecting the target group. Like in the identification step, the key stakeholders and target groups usually take a leading role in formulating the project. This ensures that the project deals with the real context and promotes ownership and commitment. Again, make sure that all stakeholder groups have the opportunity to voice their views, especially those who are often less vocal, such as women, young people and people living with a disability.

The project design phase should include a clear statement of which gender issues will be addressed. This can be done through specific targeted activities and/or through a women-friendly approach to delivery. This will then be included in the project objectives, strategy and structure.

6.3.1 Building your logical framework
The logical framework is a way of presenting the substance of the project in a comprehensive and understandable form. **It is the structure of your project proposal.**
It is used to organize all the main elements of your objective tree, including the objectives, outputs, activities, indicators and assumptions.
The logical framework matrix (also called *logframe*) is considered a planning tool, because:
> ➢ it shows the output chain (series of expected results) for the project, with a cause-effect relationship among the different project components;
> ➢ it describes the results-based management approach we need to follow if we are to achieve the objectives;
> ➢ it shows how assumptions influence each level of the output chain;
> ➢ it also contains the indicators that we will use to measure progress and the means of verifying results.

See the illustrated in the table below: From objective tree to logical framework

Objective Tree Table	Project Structure	Indicators	Means of Verification	Assumptions
Impact 1 and 2 ⟶	Development Objective			
↑ Desired Situation ⟶	Immediate Objective			
↑ Objective 1, 2 and 3 ⟶	Output			
↑ Objective 1.1, 2.1 and 3.1 ➤	Activities			

6.3.1.1 Typical structure of a logframe and definitions:
The logframe usually consists of a matrix with four columns and four rows which summarise the project structure:

- *The first column* is the project's hierarchy of **objectives**. It identifies what the project wants to achieve and how, and clarifies the causal relationships. Project objectives are achieved by providing the direct recipients with certain outputs. Outputs are produced by a set of activities. In RBM project design, the outputs and activities are the means by which to obtain the objectives. Therefore they are defined after the project objectives have been set out.
- *The second and third column* list **indicators** and the **means of verification** of impact, and the knowledge and sources required to assess the reliability of data. In other words, the indicators provide evidence of the project's progress toward the intended objectives. Hence they are the core components of the project monitoring and evaluation system, which enables the implementing agency (e.g. a cooperative support organization) to make the necessary adjustments throughout the implementation, as well as to demonstrate the project's progress (or lack of it) to the stakeholders, donors and other partners. Once the indicators have been decided, the means of verification provide precise reference to the sources of information to be consulted in order to verify the project's performance and results. As we will see later on, indicators can be quantitative (number of members, percentage of women participating in board meetings, etc.) or qualitative (customer satisfaction, quality of services, etc.) but all of them have to be assessable.
- *The fourth column* specifies important **assumptions** and uncertainties beyond the control of the project. The context in which the project operates plays an essential role in its success. Factors beyond the project's control may affect the achievement of the outputs (e.g. a major unexpected flood or drought can provoke substantial crop failures, regardless of the successful implementation of a rural development project). Such events or conditions are identified in the assumption analysis and incorporated into the project design. If assumptions do not prove valid (the rainy season is regular, as expected), the project is unable to proceed. Sometimes this column contains "risks", namely factors that may compromise the success of the project, and therefore need to be taken into account.

Structure of the project	Indicators	Means of verification	Key assumptions
Development objective *What is intended to be the longer-term impact of the project on the ultimate ben-eficiaries?*	*What are the quantitative or qualitative indicators by which the achievement of the development objective can be measured?* <u>Please note that indicators for the development objective are often beyond the control of the project.</u>	*What information sources enable the measurement of the indicators?* <u>Please note that means of verification for the development objective are not always accessible within the time-frame and range of action of the project.</u>	*What external factors are necessary to sustain the overall goals in the long run?*

Immediate objective *What are the intended benefits (the desired situation) and outcomes of the project for the target group?*	*What are the quantitative or qualitative indicators by which the achievement of the immediate objectives can be measured?*	*What information sources enable the measurement of the indicators? Do they exist (e.g. annual report of the cooperative registrar) or do they need to be developed (e.g. project progress report)?*	*What external factors are necessary if the immediate objectives are to be achieved?*
Outputs *What are the tangible products or services delivered by the project to achieve the immediate objectives?*	*What are the quantitative or qualitative indicators by which the achievement of outputs can be measured?*	*As above*	*What external factors are necessary if the outputs are to be achieved?*
Activities *What activities must be carried out to generate each intended output?*	*Inputs (raw materials, equipment, human resources, etc.)*	*Costs (of each input)*	

6.3.2. Setting the objectives, outputs and activities: first column
It sets out the basic strategy of the project and reflects the objective tree.

6.3.2.1 *The development objective*
This explains what the project does for **the final beneficiaries** in the **longer term** (see the difference between direct recipients and final beneficiaries mentioned earlier). Depending on the action domain of the target group (from a ministry to a local self-help group), it also shows how the project contributes to international development priorities, such as the Millennium Development Goals (MDGs) and national development policies. The development objective can also describe how the project contributes to local development strategies or to the strategic plan or business plan of a cooperative. The development objective will not be achieved by your project alone. The project is just one piece in a complex puzzle. The development objective corresponds to the overall picture, to which various development projects, strategic plans and business plans all contribute.

In short, a development objective has to:
- be consistent with the strategic development policy (at the level of the business plan or otheroverarching development strategies);
- avoid being a restatement with other words of the immediate objectives;
- be expressed as a desired end and not as a means;

- be a long-term objective to which the project will contribute;
- be a long-term objective for the ultimate beneficiaries;
- be stated clearly in verifiable terms.

6.3.2.2 The immediate objective

Your project is responsible for its achievement. It should address the core problem and be set out in terms of sustainable benefits for the target group. We suggest that you only have one immediate objective per project, in order to avoid excessive complexity. Multiple immediate objectives are used by large organizations with a wide domain of action, such as a cooperative confederation, a ministry or an international development agency.

An immediate objective describes the desired project outcome for the target group (direct recipients). In general, these are desirable **changes** for the target group:
• in **behaviour,** such as: "cooperative members follow good safety and health practice on HIV/AIDS prevention and mitigation";
• in a **system or service**: "cooperatives make increased use of renewable energy", "the cooperative union has set up three primary schools";
• in **institutional performance**: "the number of students in cooperative colleges has increased", "the productivity in agricultural cooperatives has improved ".
In short, an immediate objective has to:
  • contribute to achieving the development objective
  • avoid being a restatement of the outputs with other words
  • be expressed as a future completed action, an end state, and not a process.
  • be a medium-term objective to be achieved by the end of the project for the target group
  • be stated clearly in verifiable terms.

6.3.2.3 The outputs

These are the products of the activities, the combination of which leads to the achievement of the immediate objective. **The implementing organization is accountable for delivering these services and products**. Some examples of outputs are:
"The policy framework for cooperative development is improved"
"The management capacity of young entrepreneurs in district X is reinforced"
"The irrigation system is upgraded and expanded to the neighbouring district".
In short, an output has to be:
  • delivered by the project
  • necessary to achieve the immediate objective
  • demand-driven and not supply-led
  • stated clearly in verifiable terms
  • feasible with the available budget.

6.3.2.4 The Activities

These are the actions and means that will produce the outputs. In most cases, they are related to: training, equipment, institutional support, planning, studies, etc.

Activities cannot always be taken directly from the objective tree. In many cases, they will have to be defined during the formulation step, as it is quite rare that a problem and objective tree exercise allows such detail of analysis. In terms of ownership of the project, it is therefore advisable to submit the logframe again to the key stakeholders and partners. This will make sure that the described activities are based on consensus.

In short, an activity has to:
   • define the action strategy of the project;
   • be realistic in terms of inputs, resource needs and managerial capacity;
   • be stated clearly in verifiable terms.

Key actions in identifying the different objectives:
1) Identify the project **immediate objective(s),** which is generally the action you have to take in order to address the core problem on your problem tree, therefore the desired situation of your objective tree.
2) Identify the **development objective**. It is one of the objectives at the top of the objective tree which describes the long-term benefits, the long-term **impact** on society to which the project will contribute.
3) Identify the **outputs**: select from the objective tree the objectives that – by the "means to end" logic – will achieve the immediate objective. You can add other outputs that contribute to achieving the immediate objectives.
4) Identify the **activities**. Select from the objectives tree the objective that – by the "means to end" logic – will produce the outputs and translate them into activities. Activities are formulated with the verb in front, such as "organise training sessions". **Add other activities needed**, paying attention also to the specific interests of under-represented groups.

6.3.3   Setting up the Indicators and Means of Verification: second and third column

You will only know if your objectives and outputs have been achieved by setting **indicators** that are measurable. An indicator is an objective measure that indicates if and to what extent progress (in relation to the **project's objective and outputs**) is being achieved. Indicators of achievement are usually required at output level. Indicators for activities are not developed since it is considered that it is a straightforward action that you have or have not implemented.

Targets and milestones
Indicators of achievement measure change brought about by the project. They can be broken down into targets and milestones. Targets define the desired result that the project intends to reach. Milestones give information on whether the project is on track in achieving the targets. Where possible, targets and milestones should enable measuring change for women and men separately.

6.3.3.1 Type of Indicators:

Indicators can be quantitative or qualitative:
• **Quantitative indicators** use numerical data, (such as numbers of people or percentages) to indicate progress. They can be specified through a target or milestone or both, depending the donor requirements.
• **Qualitative indicators** use data based on attributes or qualities, (such as perceptions) to indicate progress.

6.3.3.2 Classification of Indicators

Direct indicators have a direct relationship to the objective or output. Direct indicators are preferred because they are very specific and relevant, and we recommend that you use them as often as possible. In some cases, they may be costly to measure (for example, data on household income require expensive statistical surveys and a good baseline9).

Indirect indicators (proxies) measure variables that are associated with a situation that fluctuates in the same direction as the objective. The stakeholders can propose proxies better because they are more familiar with the habits of the ultimate beneficiaries. But indirect indicators are less specific, because external factors other than the objective they try to measure may interfere and give an incorrect reading of the indicator.

6.3.3.3 Quantity of indicators:

The fewer the indicators per objective and output, the better. But it is often necessary to use more than one indicator for each objective statement. For example one indicator may provide good quantitative information, which needs to be complemented by another indicator that focuses on qualitative matters (such as the opinions of target groups). However, the trap of including too many indicators should be avoided.

6.3.3.4 Methodology for producing indicators:

A range of methods can be used to produce indicator data. They include:
- document reviews
- surveys
- interviews
- focus groups
- observations
- workshops.

Indicators should be independent of each other, each one relating to only one objective in the intervention logic, i.e. to the development objective, the immediate objective or one output.

The meaning of an objectively verifiable indicator is that the information collected should be the same if collected by different people (i.e. it is not open to the subjective opinion or bias of one person). This is more easily done for quantitative measures than for qualitative ones.

6.3.3.5 The characteristics of good indicators

The most effective indicators are those which are 'SMART', or, in other words exhibit all of the following characteristics:

S = Specific
M = Measurable
A = Achievable and agreed upon (by the project partners)
R = Realistic
T = Time-bound

Note that in addition to being 'SMART', indicators must also enable the measurement of project progress, achievements and impact in a gender-sensitive way.

6.3.3.6 Baselines:

When choosing your indicator of progress, it is important to know the actual data describing the current situation. For example, if your project's immediate objective indicator is "Tomato production of cooperative members is increased by 10% at the project's end", in order to verify that you have reached this indicator, you need to know beforehand what the current (before implementation of the project) tomato production by the same population (cooperative members) is. The baseline should also be disaggregated by sex (e.g. % of women actively involved in the tomato production at beginning of the project; level of income earned by them before the project starts, etc.).

Baseline is the analysis describing the situation prior to a development intervention, against which progress can be assessed or comparisons made.

6.3.3.7 Means of verification:

The means of verification should be considered and specified at the same time as the formulation of indicators. This will help to test whether or not the indicators can be realistically measured with a reasonable amount of time, money and effort.

The means of verification should specify:
- **HOW** the information should be collected (e.g. from administrative records, special studies, sample surveys, observation,) and/or the available documented source (e.g. progress reports, project accounts, official statistics, engineering completion certificates).
- **WHO** should collect/provide the information (e.g. local government workers, contracted survey teams, the district agricultural office, the project management team).
- **WHEN/HOW** information should be collected (e.g. monthly, quarterly, annually).

It is important to make sure that the required information can be collected through existing systems or at least with improvements to existing systems, and with the available resources. **In some cases, additional resources might be needed to develop a survey or database.** This should then be added to the project budget.

6.3.4   Setting up the Key Assumptions

While doing your objective tree, it became apparent that the project alone could not achieve all the objectives. Once you have selected a strategy, objectives not included in the intervention logic and other external factors remain. These factors can affect the project's implementation but are outside its control (a natural catastrophe, an economic crisis, etc.).

Key assumptions are conditions that have to be met if the project is to succeed. They are included in the fourth column of the logframe. In other words, they are the answer to the question "what external factors are not controlled by the project, but may affect its implementation and long-term sustainability?"

It is frequent to refer also to the concept of risk, together with the key assumptions. The difference between risks and assumptions lies in their either negative or positive statements. For a project to be successful, risks should not occur, while key assumptions need to be correct.

To identify assumptions, you have to assess the probability and significance of external conditions to be met in order to achieve your objectives and outputs. They are not addressed at the level of

activities, since you are supposed to control their implementation totally under the project management.

The fourth column in the matrix is used to highlight assumptions about the external conditions that need to be fulfilled if the vertical logic of the project structure (objectives and outputs) is to hold true. This same column highlights those risks that, although they are not likely to happen, may affect either the progress or the success of the project.

6.3.4.1 Types of Assumptions

Implementation assumptions: These assumptions link the immediate objectives of the project to the outputs. Since the project's management is not able to control what happens with projects outputs, there are necessarily important assumptions at this level. These assumptions are critical to the success of the project and form an important part of any evaluation.
For instance, the local government agrees to develop and implement an infrastructure development plan that will benefit the cooperative.

Development assumptions: These assumptions link immediate objectives to the development goal. The question being asked is: How is the achievement of the immediate objective going to contribute to national goals, and to ILO and donor objectives? These are often stated in the form of hypotheses or theories. They are important for the appraisal and evaluation of the project, but are not usually related to implementation of activities.

For instance, stable global economic trends.

Sustainability assumptions: These assumptions relate to the sustainability of the development and immediate objectives.

For instance, the government agrees to reform the cooperative law.
An assessment of the importance of each assumption and the probability (risk) of its being true is required. The more important and more risky the assumption, the greater the need to consider:
  • **re-designing** the project to '**internalise**' the problem and reduce the risk of the assumption not holding true. This may involve modifying or expanding project components or activities in order to influence or even control those external factors which are critical to project success; and
  • **preparing contingency plans** so as to be able to handle "worse case" outcomes.

Example

The killer assumption
Imagine that one of the project assumptions is that "**young members stay in the X Cooperative**". Now you have to verify whether this is an important assumption for the success of the project. What is the probability of this assumption occurring? If the probability is low because young people tend to prefer working in an office rather than in agriculture, you will have to "**internalise**" the assumption in order to make sure that it will not "**kill**" your project. This means that you will have to make sure that young people stay, through specific activities such as raising young people's awareness of cooperative entrepreneurship or training in modern techniques in agriculture. Then

your initial assumption could become an intended output of your project: "young people are motivated and aware of the importance of working in an agricultural cooperative".

Activity:
The trainer can use any of the examples in the module, ask the participants to follow the example and build a logical framework from a project they had faced at any point in the course of discharging their work

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Assessment:
- What is SMART? Why is it important in project design?
- How do you set up the indicators for verification of a logical framework
- Set up key assumptions from your work in the Activity box and respond to the assumptions made

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Chapter   6.4.0 Implementation planning
                 6.4.1 The work breakdown matrix
                 6.4.2 Responsibility matrix
                 6.4.3 Resource plan and budget

Objectives
- ✓ Understand the essence of and build an implementation plan
- ✓ Be able to build a work matrix on a project
- ✓ Be able to build a responsibility matrix on a project
- ✓ Prepare a resource plan with and a budget plan as well

6.4.0   Implementation planning

Module Introduction
The project design requires an implementation plan (also called work plan) for the activities listed in the logframe. The work plan demonstrates that the project is feasible in terms of responsibilities, schedule and resources. It is the basis for monitoring the operations of the project. It allows the project manager to see whether all the planned activities are implemented in the planned time, by the right staff and within the planned budget.

Some donors ask for the work plan before giving their approval. The work plan usually needs to be adjusted just before the project operations start and during the implementation.

The work plan is established by the project design team and consists of the following four matrices:
- A work breakdown matrix, which lists the activities and specific tasks.
- A responsibility matrix, which sets out who is responsible for each activity.
- A calendar of activities, which states when each activity will be completed.
- A resource (inputs) plan, which sets out the requirements for staff, equipment and materials and for the budget preparation, giving the cost of the resources needed.

Those tools allow the project team in charge of execution to *monitor the implementation of the project activities* and outputs once the project is operational.

6.4.1 The work breakdown matrix
The work plan is a key tool for monitoring project operations. It helps the team in charge of implementation to see whether the activities are carried out: on time, by the right people and within the planned budget.

A **work breakdown matrix** is used to prepare the plan of operation and must be carried out before any of the other steps can be taken. It sets out the activities and tasks required for each output. This is the basis for the subsequent steps, such as allocating responsibilities, scheduling activities and estimating resources and budget.

Project's activities can be broken down into sub-activities, tasks and sometimes sub-tasks. This improves the accuracy of cost estimates and enhances monitoring of project activities and outputs. It also provides improved reporting on obligations and actual expenditure to carry out implementation and achieve the project outputs. You start by identifying the activities, sub-activities and tasks required for each output. The format of a work breakdown matrix can be the following:

Outputs	Activities	Sub-activities (not always required, depending on the level of complexity of each project)	Tasks
1. Output	1.1 Activity	1.1.1 Sub-activity etc	Task
2. Output	2.1 Activity	2.1.1 Sub-activity etc	Task
3. Output	3.1 Activity	3.1.1 Sub-activity etc	Task

In the case study, the left-hand column of the logical framework is listed in the matrix below and tasks for each activity are specified.

6.4.2 Responsibility matrix
Good project planning ensures that responsibility for outputs and activities is assigned to teams or individuals. The responsibility matrix sets out who is responsible for each activity by allocating duties to different people within the team. All the activities required of a particular individual or organization form their job description or terms of reference for their involvement in the project. This helps in coordinating the work of team members, contractors or partners. As often said, a job assigned to everybody without specification is a job handed to nobody.

See this short example of how a project team allocates responsibilities for each activity to different people and organizations:

Project Output	Activities	Responsible Staff or Implementation agency	Implementation Partner
Improved health of farmers' livestock	Provide training for farmers in basic veterinary skills	Member of the management in charge of human resource development	College of veterinary medicine
	Run a vaccination campaign for the	Member of the management board in	Association of veterinarians

	cows, in partnership with the local Ministry of Agriculture	charge of livestock support	

6.4.3 Resource plan and budget

A resource plan sets out the requirements and costs for all necessary inputs: personnel, basic office premises or facilities, equipment and materials, or services such as special subcontracting supplies, training workshops and other miscellaneous inputs.

The results-based management approach prepares the resource plan on the basis of the activities in the work breakdown matrix and calendar. For each activity, a list of inputs is prepared, and these can then be aggregated by category (raw materials, equipment, personnel, etc.) to produce an overall project procurement plan.

The resources required to implement the activities associated with each output should be tabulated. For the implementation plan, it is rarely necessary to estimate resource requirements at sub-activity level. The table should list resource requirements and the amount of each resource required.

The resource plan is the basis for the **budget preparation**. It allows you to assess the cost of each activity exactly. It is important to put the management needs, such as staff and administrative costs, in the resource plan, and then to transfer those costs to the budget format per heading: total staff, equipment, training, etc.

Activity:
- Using the case study in module 6.1.3, build a work breakdown matrix

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Assessment:
- Why is necessary to have an implementation plan for every project?
- What are the qualities of a good responsibility matrix and why?

Module   6.5.0   Planning of monitoring and evaluation
            6.5.1   Monitoring plans
            6.5.2   Planning the evaluation

Objectives
- ✓ Understand the importance of having a monitoring and evaluation plan
- ✓ Be able to develop a monitoring plan for a project
- ✓ Be able to develop an evaluation plan for a project
- ✓ Prepare a M&E plan for a personal simulated project developed by the participant

6.5.0 Planning of monitoring and evaluation

Module Introduction
Monitoring and evaluation (M&E) needs to be prepared. Therefore it is necessary to build it into the design of the project and to allocate resources for it from the start. This manual aims to assist you in the design of a project. The evaluation process per se will not be presented because it is often conducted by an external person to the project team (an evaluator) and sometimes organised

by the donor. However, evaluation has to be planned from the beginning of the design, and a specific budget allocated.

Basically, M&E is about comparing what was originally planned with what actually happens. It tracks progress at each level of the logical framework: activities, outputs, outcomes and impacts (objectives). M&E has four key concepts:
- comparison
- measurement
- verification
- action.

Evaluation is essentially a reality test to assess the significance of the project. In particular, it looks at the efficiency, effectiveness, impact, sustainability and relevance of the project given its stated objectives. Evaluation has two specific purposes: accountability and learning. Accountability refers to the obligation of the project to demonstrate to the donor, stakeholders, beneficiaries and others that it was implemented in compliance with its original design, agreed contracts and plans. Moreover, evaluation offers opportunities to learn about the achievement of results and the performance of the project team. Lessons learned can be applied to future projects. For cooperative projects, three modes of evaluation are particularly relevant: (1) Self-evaluation carried out by members of the project team; (2) Internal evaluation conducted by people from the cooperative organization who have no previous links to the project; and (3) External evaluation, which is managed by external evaluators who have no previous links with the project being evaluated. External evaluations are usually initiated, led and financed by a donor agency, in cases where there is a donor agency or by a department on evaluation within an organization or cooperative. Evaluation is thus a periodic assessment, which usually takes place at the middle or at the end of the project whereas monitoring is a continuous internal process that analyses the project's achievements concerning the outputs to enable project managers to take corrective action when necessary.

Differences between monitoring and evaluation

	Why?	When?	Who?	For Whom
Monitoring	Check progress towards planned objectives (Impact monitoring) outputs and activities (implementation monitoring). Take remedial actions if necessary. Contribute to progress report	Continuous activity	Project team	Project management. Main stakeholders
Evaluation	Check whether the right objectives and	Periodic: usually at the end of the project. For longer projects it	An external evaluator. Members of the cooperative	Project management. Stakeholders. Beneficiaries.

	strategies have been chosen. Learn lessons for future projects. Provide accountability.	can also be done half way.	organization with no previous links. Project team	Donors. Wider audience.

6.5.1 Monitoring plans

Monitoring is a core management responsibility. It involves collection, analysis and communication concerning the progress of the project and outputs achieved. It identifies actual and potential successes or failures as early as possible, and facilitates timely adjustments to what is being done. It enables the stakeholders to review progress and to propose action to achieve the objectives.

There are three types of monitoring. They happen at different levels of the logical framework and serve different functions: 1) **implementation monitoring** is operational: it monitors the activities and outputs; 2) **impact monitoring** concentrates on the immediate objectives; 3) **reporting** concerns the concrete (narrative and financial) reports that have to be prepared and submitted periodically to the main stakeholders.

6.5.1.1 Implementation monitoring (operational)

What is it?
Implementation monitoring answers the question: ***What have we done?*** It follows what the project produces (goods and services) for its beneficiaries. It is used for implementation management. This type of monitoring is mainly an ***implementation management tool*** for the project manager, because it makes it possible to check at any time that implementation is on track. It provides information on whether resources are being used correctly to produce the activities, whether activities are being carried out within the planned time frames and whether outputs are obtained and delivered as necessary. Implementation monitoring can be used for short-term project progress reporting (e.g. quarterly or bi-annually).

How to do it
The main tools of this type of monitoring are the implementation matrices in step 3 and the output indicators. Project management must keep track of how the project is spending the budget, using the inputs and carrying out the activities in order to produce the outputs. The use of the logframe and implementation tools is recommended. The implementation plans (work breakdown structure, calendar of activities and budget) are just estimates of what will happen in the future. They must be reviewed and modified during implementation on the basis of what really happened.

Tools for operational monitoring
The implementation plan provides the tools to be used for operational monitoring:
- Monthly work plan
- Work breakdown structure
- Calendar of activities

• Budget

Implementation monitoring using an example case study
If administrative records show that 25 dairy cooperatives members have received training, you need to know how this compares to what was planned, in order to assess performance. If the plan was to train 100 dairy cooperative members, and all the resources/costs originally budgeted for have been spent, this would indicate a problem either with implementation performance and/or with the original plan and budget. Planners and managers would need to analyse the causes of the problem and determine an appropriate course of remedial action.

6.5.1.2 Impact monitoring (immediate objective)

What is it?
This level of monitoring focuses on immediate objectives and their contribution to the development objective during the project's implementation. Impact monitoring is an input into the final evaluation which will verify the impact of the project only at the end. The key question in this type of monitoring is *What have we achieved?* The centre of attention is what changes the project has produced in the ultimate beneficiaries and the target group. The development of changes in stakeholders, the ownership of achievements and sustainability are especially relevant aspects of this type of monitoring.

This type of monitoring is a *performance management tool*, since it provides information on whether outputs are used and owned by the target groups, on the changes that the project is producing on the context, and on any other aspects related to the project's objectives. This is essential information for the project manager and stakeholders to see whether the project is contributing to development beyond its activities and products.

How to do it
Monitoring that focuses on results requires painting the initial picture of the situation that the project will change. This initial situation is called the **baseline**. It will be useful as a comparison point with which to verify progress towards the results. The baseline paints the initial picture, which is essential in the monitoring of results. Progress is measured using the indicators for the immediate objectives. These are complemented by performance questions on key matters such as ownership, use and usefulness of products, sustainability, compliance by strategic partners and contextual factors.

In this type of monitoring, the participation of stakeholders is crucial, given that they are responsible for the outputs. The timing of data collection is therefore usually more spread out than in implementation monitoring. Reports also cover longer periods, usually annual or biennial.

Tools for impact monitoring
Tools to be used for impact monitoring: **indicators and means of verification** developed in the **logical framework** and baselines and mid-term targets for achieving those indicators.

6.5.1.3 Reporting
All the information gathered in the monitoring plans will allow you to prepare the mid-term and final reports. The progress of the project against what was planned is assessed and the information is presented clearly in a report. Specific templates exist for each donor, consistent with the initial

application form, so that you can compare what was planned with what was actually achieved. Indicators are therefore crucial to monitoring the success of the project and to reporting on it.

6.5.2 Planning the Evaluation

What is it?

The evaluation is intended to make an overall assessment of the completed project. The purpose is to determine the relevance of the achievement of the objectives, the effectiveness, the efficiency, the impact and the sustainability of the project.

The evaluator has to be external. He or she will assess the impact of the project, given the planned objectives. The participation of the stakeholders in the evaluation is crucial in order to ensure that the different perspectives and views are taken into account.

In most cases, the evaluation is only conducted at the end of the project, but for wider projects and programmes mid-term and ex-ante evaluations can be conducted. Mid-term evaluations are often similar to impact monitoring but are conducted by an external assessor, whereas monitoring is internal. It gives the project management and the stakeholders an independent analysis of the progress made towards the planned objectives, one with which they can review the strategy. Ex-ante evaluation is conducted after the end of the project, up to five years later, in order to verify if the results obtained by the project are sustainable.

How to do it

Evaluation, based on the indicators, focusing on the project's immediate objective and how your project contributes to the development objective.

The logical framework clearly specifies what is to be achieved (outputs and immediate objective), how it is to be verified (indicators and means of verification) and the key assumptions. The project management will prepare the terms of reference (ToR) of the evaluation, based on expected outputs as mentioned in the logframe.

Adequate resources should be set aside for conducting the evaluation (hiring a consultant, field visits, etc.) and the necessary conditions and capacities ensured.

Evaluation is the last step in the project cycle presented in chapter 1, but it is not the end of a project. Indeed, it can be considered the starting point for a new planning process, because the conclusions of the evaluation will allow the stakeholders to draw lessons that may guide future decision-making and project identification. That is the logic of the project cycle.

Activity:

- Prepare a monitoring plan for the case study of X in module 6.1.3 of the module
- Prepare an evaluation plan for the case study of X in module 6.1.3 of the module

Assessment:
Each participant should develop his/her own personal simulated project and Prepare a M&E plan for the project.

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