

THE NATIONAL ANTI-CORRUPTION STRATEGY (2017 – 2021) ACTION PLAN

VISION: A Nigeria free of corruption for sustainable human development

MISSION: To provide a holistic National Anti-Corruption Strategy for all sectors and stakeholders in the fight against corruption

Implementation will be phased into 3 levels

Level 1 Strengthening the Legal and Institutional Framework Designed to Prevent and Combat Corruption

Level 2 Mainstreaming Anti-Corruption Principles into Governance and Service Delivery

Level 3 Mainstreaming Anti-Corruption Principles into Sub-National Public Administration

Timeline Short Term (0-3months) Medium Term (3months-1year) Long Term (1-4years)

Technical Objectives of the Pillars

I - Prevention
II - Public Engagement
III - Ethical Re-orientation
IV - Enforcement & Sanctions
V - Recovery and Management of Proceeds of Crime

v EACH AGENCY SHOULD DRAW UP ITS ACTION PLAN

GUIDE TO THE NUMBERING: THERE ARE 4 OR 5 NUMBERS IN THE BOXES

- First digit indicates the Technical Objective
- Second digit –indicates the Level
- Third digit-indicates the Headings of the Level
- Fourth or/and Fifth digit(s)-indicate(s) the point(s)

ACKNOWLEDGEMENTS

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The Contributions of the following persons are acknowledged:

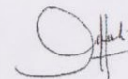
- a) Ladidi B. Mohammed (Chairman, Technical Committee on the Implementation of the National Anti-Corruption Strategy);
- b) Bunmi Naiyeju-Adelaiye (Member, Technical Committee on the Implementation of the National Anti-Corruption Strategy);
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- e) Mr. Danladi Plang (National Programme Manager EU-RoLAC);
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Abubakar Malami

Honourable Attorney-General of the Federation
And Minister of Justice

LIST OF ACRONYMS

1.	AC	-	Anti-Corruption
2.	ACAs	-	Anti-Corruption Agencies
3.	ACJA	-	Administration of Criminal Justice Act
4.	ACJL	-	Administration of Criminal Justice Law
5.	ACTUs	-	Anti-Corruption & Transparency Monitoring Units
6.	AFF	-	Anti- Corruption Funding Framework
7.	AGF	-	Attorney-General of the Federation
8.	AMA	-	Asset Management Agency
9.	APER	-	Annual Performance Evaluation Report
10.	ARMU	-	Asset Recovery and Management Unit
11.	BPP	-	Bureau of Public Procurement
12.	BPSR	-	Bureau of Public Service Reforms
13.	CAC	-	Corporate Affairs Commission
14.	CAN	-	Christian Association of Nigeria
15.	CBN	-	Central Bank on Nigeria
16.	CBOs	-	Community Based Organisations
17.	CCB	-	Code of Conduct Bureau
18.	CRAs	-	Corruption Risk Assessments
19.	CSO	-	Civil Society Organisation
20.	DPR	-	Department of Petroleum Resources
21.	EFCC	-	Economic & Financial Crimes Commission
22.	EITI	-	Extractive Industry Transparency Initiative
23.	FBOs	-	Faith Based Organisations
24.	FIRS	-	Federal Inland Revenue Service
25.	FME	-	Federal Ministry of Education
26.	FMF	-	Federal Ministry of Finance
27.	FMH	-	Federal Ministry of Health
28.	FMIC	-	Federal Ministry of Information and Culture
29.	FMoJ	-	Federal Ministry of Justice
30.	FOI	-	Freedom of Information
31.	FMST	-	Federal Ministry of Science and Technology
32.	FMWASD	-	Federal Ministry of Women Affairs and Social Development
33.	FMYDS	-	Federal Ministry of Youth Development and Spor

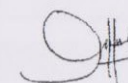


LIST OF ACRONYMS

34.	FRC	-	Fiscal Responsibility Commission
35.	HOS	-	Head of Service
36.	IATT	-	Inter-Agency Task Team
37.	ICPC	-	Independent Corrupt Practices & Other Related Offences Commission
38.	ICT	-	Information and Communication Technology
39.	INEC	-	Independence National Electoral Commission
40.	LEAs	-	Law Enforcement Agencies
41.	LGAs	-	Local Government Area(s)
42.	MBNP	-	Ministry of Budget and National Planning
43.	MDAs	-	Ministries, Departments and Agencies
44.	M&E	-	Monitoring and Evaluation
45.	MFA	-	Ministry of Foreign Affairs
46.	MLA	-	Mutual Legal Assistance
47.	MOJ	-	Ministry of Justice
48.	NACS	-	National Anti-Corruption Strategy
49.	NAPTIP	-	National Agency for Prohibition of Trafficking In Person
50.	NASS	-	National Assembly
51.	NBA	-	Nigeria Bar Association
52.	NBTE	-	National Board for Technical Education
53.	NCC	-	Nigerian Communication Commission
54.	NCCE	-	National Commission for Colleges of Education
55.	NCS	-	Nigeria Customs Service
56.	NCTRN	-	National Council for Traditional Rulers in Nigeria
57.	NDLEA	-	National Drug Law Enforcement Agency
58.	NEITI	-	Nigeria Extractive Industries Transparency Initiative
59.	NERDC	-	Nigerian Educational Research and Development
60.	NFIU	-	Nigeria Financial Intelligence Unit
61.	NFIA	-	National Financial Intelligence Agency Bill
62.	NGE	-	Nigerian Guild of Editors
63.	NIA	-	Nigeria Intelligence Agency
64.	NILDS	-	National Institute for Legislative and Democratic Studies
65.	NIM	-	National Institute Management

LIST OF ACRONYMS

66.	NIPSS	-	National Institute for Policy and Strategic Studies
67.	NJC	-	National Judicial Council
68.	NJI	-	National Judicial Institute
69.	NNPC	-	Nigeria National Petroleum Cooperation
70.	NLRC	-	Nigeria Law Reform Commission
71.	NMA	-	Nigeria Maritime Authority
72.	NOA	-	National Orientation Agency
73.	NPF	-	Nigeria Police Force
74.	NPS	-	Nigerian Prisons Service
75.	NTI	-	National Teachers Institute
76.	NSA	-	National Security Adviser
77.	NSCIA	-	Nigeria Supreme Council for Islamic Affairs
78.	NUC	-	Nigeria University Commission
79.	NUT	-	National Union of Teachers
80.	NYSC	-	National Youth Service Corps
81.	OAugF	-	Office of the Auditor-General of the Federation
82.	OHCSF	-	Office of the Head of Civil Service of the Federation
83.	OGP	-	Open Government Partnership
84.	OSGF	-	Office of the Secretary to the Government of the Federation
85.	PCC	-	Public Complaints Commission
86.	POC	-	Proceeds of Crime Bill
87.	PPA	-	Public Procurement Act
88.	RA	-	Regulatory Agency
89.	SCUML	-	Special Control Unit Against Money Laundering
90.	SDGs	-	Sustainable Development Goals
91.	SERVICOM	-	Service Compact Agreement
92.	SMI	-	State Ministry of Information
93.	SSG	-	Secretary to the State Government
94.	TC-NACS	-	Technical Committee on National Anti-Corruption Strategy
95.	TUGAR	-	Technical Unit on Governance & Anti-Corruption Reforms
96.	UBEB	-	Universal Basic Educational Board
97.	UBEC	-	Universal Basic Educational Commission
98.	WPA	-	Witness Protection Act
99.	WBP	-	Whistle Blower Policy



TECHNICAL OBJECTIVE 1 – PREVENTION

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 1 - Strengthening the legal and institutional framework designed to prevent and combat corruption						
<p>1.1.1.1 Improved legal and institutional framework for prevention of corruption</p>	<p>1.1.2.1 To maintain relevance of Anti-Corruption legal tools in response to emerging corruption challenges</p>	<p>1.1.3.1 Ensure the amendments or passing of new legislations</p>	<p>1.1.4.1.1 Passage of relevant Anti-Corruption Bills: POC, Access to Public Officers' Asset Declarations, Asset Management Bills, Civil Assets Forfeiture Bill, Special Crimes Courts Bill, Audit Bills, Criminal Reforms Bill, Whistleblowers & Witness Protection Bills, Police & Prisons Reform Bill etc. 1.1.4.1.2 Relevant Committees of NASS to expedite consideration and passage of these bills. 1.1.4.1.3 FMOJ Legal Drafting Committee to facilitate enactment or amendment of targeted Anti-corruption legislations when necessary. 1.1.4.1.4 Relevant MDAs, CSOs & Media to increase advocacy and awareness on the passage of these laws. 1.1.4.1.5 Implementation of the laws.</p>	<p>1.1.5.1 FMOJ, NASS, CSOs, Executive, MDAs, Media.</p>	<p>1.1.6.1 Ongoing Ongoing Ongoing Ongoing</p>	<p>1.1.7.1 Approved Annual budget of implementing agency and supported by Development Partners</p>
	<p>1.1.2.2 To build the capacities of ACAs, LEAs and other relevant agencies</p>	<p>1.1.3.2 Equip ACAs, LEAs and other relevant agencies with necessary resources and skills to prevent and combat corruption</p>	<p>1.1.4.2.1 ACAs & LEAs to advocate for increased budget support from NASS. 1.1.4.2.2 ACAs & LEAs to request development partners for skills and equipment support. 1.1.4.2.3 Reinforce the relevant technical capacities of ACAs, LEAs and other relevant Agencies' Training Institutes. 1.1.4.2.4 ACAs and LEAs to align/develop strategic plans 2018 – 2021 in line with NACS 2017 -2021 Action Plan. 1.1.4.2.5 ACAs & LEAs to conduct a capacity needs assessment of their staff. 1.1.4.2.6 Based on the identified needs, design & continuously train to build the capacity of their staff to be better positioned to combat corruption</p>	<p>1.1.5.2 ACAs, LEAs, and other relevant Agencies' Training Institutions</p>	<p>1.1.6.2 Ongoing Ongoing July 2018 July 2018 August 2018, then Annually</p>	<p>1.1.7.2 Approved budget of the implementing agency supported by Development Partners.</p>

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 1 - Strengthening the legal and institutional framework designed to prevent and combat corruption						
	1.1.2.3 To enhance the efficiency and synergy of ACAs & LEAs.	1.1.3.3 Strengthening coordination and cooperation of ACAs & LEAs	<p>1.1.4.3.1 Establishment of Joint Anti-Corruption Hotline / Call Centre</p> <p>1.1.4.3.2 Establishment of a one-stop information Centre & feedback platform dedicated to collecting & disseminating information on the operations of ACAs & LEAs.</p> <p>1.1.4.3.3 Development and implementation of a coordination protocol on intelligence sharing to ensure sustainable cooperation among key ACAs, LEAs & Justice Sector Institutions.</p> <p>1.1.4.3.4 Establishment of a platform for sharing information among LEAs/ACAs/NSA and financial sector regulators.¹</p>	1.1.5.3 IATT, FMOJ (Citizen's Right), Justice Sector Institutions, NCC, NIA, NPA, CSOs, Nigeria Maritime Authority, Private Sector.	<p>1.1.6.3</p> <p>October 2018</p> <p>October 2018</p> <p>December 2018</p> <p>July 2018</p>	1.1.7.3 Approved budget of the implementing agency supported by Development Partners.

¹ See page 28 of National Action Plan of the Open Government Partnership

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 2: Mainstreaming Anti-Corruption Principles into Governance and Service Delivery						
1.2.1.1 Safeguarding integrity in the election process	1.2.2.1 To increase the level of political accountability	1.2.3.1 Ensure that Political parties comply with the provisions of the Electoral Act.	<p>1.2.4.1.1 Annual open declaration of assets by political parties.²</p> <p>1.2.4.1.2 Ensure that Political Parties and intending office holders comply with the provisions of the Tax Laws.</p> <p>1.2.4.1.3 Increasing the transparency of political parties financing through annual review of political activities.</p> <p>1.2.4.1.4 Post-election reports including recommendations, observations etc. to be published.</p> <p>1.2.4.1.5 Ethics and Integrity training for electoral officers & members of Political parties.</p> <p>1.2.4.1.6 INEC to partner with CSOs and Media to intensify voter education on the election process</p>	1.2.5.1 INEC, Political Parties, FIRS, CSOs, Media, SGF	<p>1.2.6.1 Annually</p> <p>Ongoing</p> <p>Annually</p> <p>One month after Elections</p> <p>Annually</p> <p>Annually</p>	1.2.7.1 Approved budget of the implementing agency supported by Development Partners.
1.2.1.2 Addressing Public Institutions Specific vulnerabilities	1.2.2.2 To reduce MDAs corruption vulnerabilities by systematic implementation of preventative measures	1.2.3.2 Periodic review of MDAs systems to ensure compliance with the	<p>1.2.4.2.1 Regulatory Agencies (FMF, Min of Interior, NUC, FME, FMH, NJC, NCCE, NBTE) do a mapping of areas prone to corruption in the MDAs under their supervision</p> <p>1.2.4.2.2 Conduct CRAs and System studies of these MDAs.</p> <p>1.2.4.2.3 Based on the assessments, design an integrity plan for each of the institutions</p>	1.2.5.2 OHCSF, ICPC and MDAs, FMF, Ministry of Interior, NUC, FME, FMH, NJC, NCCE, NBTE, BPSR, FIRS, SERVICOM.	<p>1.2.6.2 July 2018</p> <p>October 2018</p> <p>November 2018</p>	1.2.7.3 Approved budget of the implementing agency supported by Development Partners.

² See Section 89 of the Electoral Act 2010

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 2: Mainstreaming Anti-Corruption Principles into Governance and Service Delivery						
		principles of good governance	<p>1.2.4.2.4 Request these MDAs to develop and implement clear service processes and Standard Operating Procedures.</p> <p>1.2.4.2.5 Full implementation of ICPC's MDAs Ethics and Compliance Scorecard and a publication of the results.</p> <p>1.2.4.2.6 FIRS to improve the database statistics, records and reports of persons, organization, proceeds, properties, documents or other items or assets relating to the Tax Administration.</p> <p>1.2.4.2.7 FIRS to ensure full implementation of Tax Payer Identification Number to every taxable persons in Nigeria in collaboration of State Boards of Internal Revenue and Local Government Councils.</p>		<p>December 2018</p> <p>Annually</p> <p>September 2018</p> <p>September 2018</p>	
	1.2.2.3 To Institutionalize online asset declaration	1.2.3.3 Deploy the online asset declaration and management systems of CCB	<p>1.2.4.3.1 Complete software portal.</p> <p>1.2.4.3.2 Procure equipment for a document management system.</p> <p>1.2.4.3.3 Upgrade the hardware. asset declaration</p> <p>1.2.4.3.4 Sensitize stakeholders on online</p> <p>1.2.4.3.5 Full implementation of the online assets declaration.</p>	1.2.5.3 CCB, FIRS, All Public Servants	<p>1.2.6.3 September 2018 September 2018</p> <p>July 2018- 2019 July 2018-</p> <p>Ongoing</p>	1.2.7.4 Approved budget of the implementing agency supported by Development Partners.

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 2: Mainstreaming Anti-Corruption Principles into Governance and Service Delivery						
			<p>1.2.4.3.6 Capacity training for CCB staff on the use of the online portal.</p> <p>1.2.4.3.7 FIRS to deploy tax online asset and income declaration and management system.</p>		<p>October 2018</p> <p>October 2018</p>	
	1.2.2.4 Increasing Institutional transparency by increasing the availability of public data made available by public institutions	1.2.3.4 Full implementation of and compliance with Freedom of Information Act (FOI)	<p>1.2.4.4.1 FMOJ to conduct assessment survey on FOI implementation and compliance level.</p> <p>1.2.4.4.2 Capacity building for MDAs and CSOs on increased use and compliance.</p> <p>1.2.4.4.3 Sensitize stakeholders on the FOI Act.</p>	1.2.5.4 FMOJ, MDAs, CSOs	<p>1.2.6.4 June 2018</p> <p>October 2018</p> <p>Ongoing</p>	1.2.7.4 Approved budget of the implementing agency supported by Development Partners.
	1.2.2.5 To increase the oversight functions of the ACTUs	1.2.3.5 Strengthen the existing ACTUs and establishment of ACTUs in MDAs where they do not exist	<p>1.2.4.5.1 Strengthen partnership between ICPC and OHCSF towards increased oversight of ACTUs on MDAs.</p> <p>1.2.4.5.2 Introduction of the Anti-Corruption Monitoring Officer Professional Cadre in the Public Service/MDAs.</p> <p>1.2.4.5.3 Development of a certification process for the ACTUs.</p> <p>1.2.4.5.4 ICPC to ensure full implementation of the ACTU effectiveness Index and ACTU Reporting Template.</p> <p>1.2.4.5.5 Train ACTUs on the implementation of the NACS.</p> <p>1.2.4.5.6 Train ACTUs to double as procurement oversight mechanisms in MDAs.</p>	1.2.5.5 OHCSF, BPSR, ICPC, MDAs, TC-NACS, ACTUs	<p>1.2.6.5 Ongoing</p> <p>April 2019</p> <p>April 2019</p> <p>October 2018</p> <p>July 2018</p> <p>July 2018</p>	1.2.7.5 Approved budget of the implementing agency supported by Development Partners.

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 2: Mainstreaming Anti-Corruption Principles into Governance and Service Delivery						
	1.2.2.6 To operationalize the NACS	1.2.3.6 Activation of the implementation of the NACS	<p>1.2.4.6.1 Establishment of an implementing body and oversight bodies.</p> <p>1.2.4.6.2 Development of effective tools for implementation</p> <p>1.2.4.6.3 Training on M&E for M&E committee.</p> <p>1.2.4.6.4 Capacity training for TC-NACS.</p> <p>1.2.4.6.5 Public presentation of NACS at the Federal and the six (6) Geopolitical zones and continued sensitization on the strategy.</p> <p>1.2.4.6.6 Development of a NACS Website</p> <p>1.2.4.6.7 Train ACTU's officers to double as MDAs' NACS committee.</p> <p>1.2.4.6.8 Conduction of annual NACS Forum.</p> <p>1.2.4.6.9 Submission of NACS implementation costs by Implementing Agencies.</p> <p>1.2.4.6.10 TC-NACS to collate resource requirements and make presentation to AGF & IMC for onward presentation to FEC for ratification.</p>	1.2.5.6 FMOJ, NACS IMC, TC-NACS, ACTUs, Relevant Agencies, Non- State Actors	<p>1.2.6.6 March 2018 April 2018 May 2018 April-May 2018 April- May 2018 May 2018 July- August 2018 November, Every Year May 2018 May 2018</p>	1.2.7.6 Approved budget of the implementing agency supported by Development Partners.
1.2.1.3 Transparent and	1.2.2.7 To Strengthen procurement	1.2.3.7 Provide adequate	1.2.4.7.1 Conduct capacity needs assessment for BPP staff and BPP training centres to identify possible areas for capacity building.	1.2.5.7 BPP, OAuGF	1.2.6.7 July 2018	1.2.7.7 Approved budget of the implementing

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 2: Mainstreaming Anti-Corruption Principles into Governance and Service Delivery						
Accountable Public Service	processes	support to procurement system reform	<p>1.2.4.7.2 Conduct capacity training for OAuGF staff on implementation of procurement systems including e-procurement.</p> <p>1.2.4.7.3 Capacity building to contractors and procurement monitors.</p> <p>1.2.4.7.4 Development or full implementation of e-procurement system.</p> <p>1.2.4.7.5 Development of Procurement Performance Measurement System to improve oversight throughout the procurement cycle.</p> <p>1.2.4.7.6 Establishment of mechanisms for Monitoring and Evaluation of adherence to the provisions of the Public Procurement Act 2017.</p> <p>1.2.4.7.7 Full implementation of Open contracting and adoption of open contracting data standards in the public sector.³</p> <p>1.2.4.7.8 Development of Citizens' tool for the National open contracting portal as well as a contracts field verification tool for national verifiers.</p> <p>1.2.4.7.9 Establishment of a National Contractors verification team and a verification database.</p> <p>1.2.4.7.10 Development of National product specifications and classification scheme.</p>		<p>Ongoing</p> <p>August 2018</p> <p>October 2018</p> <p>July 2018</p> <p>July 2018</p> <p>May 2018- July 2019</p> <p>July 2018</p> <p>October 2018</p> <p>July 2018</p>	agency supported by Development Partners.

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 2: Mainstreaming Anti-Corruption Principles into Governance and Service Delivery						
	1.2.2.8 Enhancing transparency and accountability in budget management	1.2.3.8 Ensure more effective citizen's participation across the entire budget cycle	1.2.4.8.1 Ministry of Budget and National Planning (MBNP) to advocate for Public hearings organized by the NASS on the budget. 1.2.4.8.2 Training on budget design and management for NASS to strengthen their oversight functions. 1.2.4.8.3 Strengthen auditing of public institutions and ensuring that audit reports are produced on time. 1.2.4.8.4 OAuGF to ensure follow up of audit reports with MDAs. 1.2.4.8.5 Strengthen relationship of OAuGF and NASS in implementation of Auditor-General of the Federation report. 1.2.4.8.6 Full implementation of the Fiscal Responsibility Act 2007.	1.2.5.8 MBNP, FMF, Auditor- General of the Federation, NASS relevant committees, CSOs, Fiscal Responsibility Commission	1.2.6.8 Ongoing Annually Annually Ongoing Ongoing Ongoing	1.2.7.8 Approved budget of the implementing agency supported by Development Partners.
	1.2.2.9 To Increase the use of ICT in service delivery	1.2.3.9 Adopt a technology-based service delivery to enhance transparency and accountability	1.2.4.9.1 Development and enforcement of a National ICT Policy. 1.2.4.9.2 Relevant MDAs to acquire ICT tools and equipment. 1.2.4.9.3 ICT training programs. 1.2.4.9.4 Development and implementation of e-complaint mechanism in all MDAs.	1.2.5.9 MDAs, FMC, NITDA, PSIN, NIGCOMSAT and NCC.	1.2.6.9 October 2018 April 2019 May 2019 June 2018	1.2.7.9 Approved budget of the implementing agency supported by Development Partners.
	1.2.2.10 To enhance transparency	1.2.3.10 Full compliance	1.2.4.10.1 NEITI to ensure public disclosure of revenue, payments and receipts in the extractive Industry.	1.2.5.10 NEITI, CAC, FMF, NNPC, DPR,	1.2.6.10 Ongoing November	1.2.7.10 Approved budget of the implementing agency

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 3: Mainstreaming Anti-Corruption Principles into Sub-National Public Administration						
	and accountability in the extractive industry.	with the Global principles of the Extractive Industry Transparency Initiative	<p>1.2.4.10.2 Collaboration with CAC to develop a register of Beneficial Ownership in the Extractive Industry.</p> <p>1.2.4.10.3 Development of a mechanism to ensure transparency in Commodity Trading in the Extractive Industry</p> <p>1.2.4.10.4 Implementation of Open Data Policy on information access and use of extractive revenue funds.</p> <p>1.2.4.10.5 Partner with the Federal Ministry of Finance to establish due process to ensure transparency in fiscal allocation and statutory disbursement and utilization of extractive revenue funds.</p>	CSOs, MEDIA.	2018 November 2018 Ongoing December 2018	supported by Development Partners
Level 3: Mainstreaming Anti-Corruption Principles into Sub-National Public Administration						
1.3.1.1 Scaling down the Federal initiatives to the sub-National levels	1.3.2.1 To establish legal & Institutional Framework for preventing of corruption in sub-national public Administration	1.3.3.1 Replicate the National Framework	<p>1.3.4.1.1 Establishment of Anti-Corruption Bureau at all levels of government.</p> <p>1.3.4.1.2 Passage of Anti-Corruption laws modeled after the Federal Laws or adoption of Federal laws: FOIA, Whistle-Blower Policy and Witness Protection Bill etc.</p> <p>1.3.4.1.3 Establishment of ACTUs in state MDAs & LGA.</p>	1.3.5.1 State Governments, State House of Assembly, State Ministry of Justice, Local Government Chairmen, ICPC, State MDAs, Office of the Heads of Civil Service of the States.	1.3.6.1 Ongoing Ongoing Ongoing	1.3.7.1 Approved budget of the implementing agency supported by Development Partners.
	1.3.2.2 Ensuring	1.3.3.2 Introduction	1.3.4.2.1 Conduction of CRAs and System Studies	1.3.5.2 State MDAs, OGP,	1.3.6.2 Annually	1.3.7.2 Approved budget of the

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 3: Mainstreaming Anti-Corruption Principles into Sub-National Public Administration						
	decentralization with accountability	of Corruption Risk Assessments at the state and Local Government	<p>1.3.4.2.2 Based on the assessment, design Integrity Plan.</p> <p>1.3.4.2.3 Full implementation and monitoring of integrity plans</p> <p>1.3.4.2.4 Adoption of the OGP and implementation of its Action Plan.</p> <p>1.3.4.2.5 Adopt reforms at the Federal Levels especially in Procurement, Financial Management, Asset declaration, ICT, etc.</p> <p>1.3.4.2.6 CSOs to monitor and track budget implementation and submit report to ICPC.</p> <p>1.3.4.5.7 Adoption of the NACs.</p>	Office of the Heads of Civil Service of the States., Local Government chairmen, Secretariat, TC-NACS, ICPC, Media and CSOs	<p>Annually</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Annually</p> <p>Ongoing</p>	implementing agency supported by Development Partners.

TECHNICAL OBJECTIVE 2 - PUBLIC ENGAGEMENT

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 1: Strengthening the Legal and Institutional Framework for Public Engagement						
2.1.1.1 Fully capacitated Public Engagement Oversight bodies	2.1.2.1 To improve the efficiency and effectiveness of PCC, FMIC, NOA, CCB and NHRC.	2.1.3.1 Equip PCC, FMIC, CCB, NHRC and, NOA with necessary resources and skills.	<p>2.1.4.1.1 Review and amend PCC Act, FMIC, CCB, NHRC and NOA Establishment Act to make them relevant to emerging challenges.</p> <p>2.1.4.1.2 Conduct system studies of the PCC, FMIC, CCB, NHRC and NOA to find out the root causes of under-performance.</p> <p>2.1.4.1.3 Conduct a needs analysis of these agencies.</p> <p>2.1.4.1.4 Based on the assessment, close</p>	2.1.5.1 PCC, FMIC, ICPC, NASS, NOA, CSOs, CCB and NHRC	<p>2.1.6.1 July 2018</p> <p>October 2018</p> <p>July 2018</p> <p>October 2018</p>	2.1.7.1 Approved budget of the implementing agency supported by Development Partners.

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 1: Strengthening the Legal and Institutional Framework for Public Engagement						
			<p>the identified gaps.</p> <p>2.1.4.1.5 Design and implement capacity development training.</p> <p>2.1.4.1.6 PCC to increase awareness of the existence of its Multilingual Call Centre.</p>		<p>October 2018, thereafter annually</p> <p>Ongoing</p>	
Level 2: Mainstreaming Anti-Corruption Principles into Governance and Service Delivery						
2.2.1.1 Improved Public Awareness of corruption and its implication	2.2.2.1 To sensitize the entire nation about corruption and its implication	2.2.3.1 Formulate Anti-Corruption initiatives in Primary, Secondary schools and Tertiary Institutions	<p>2.2.4.1.1. Establish Anti-Corruption clubs from Primary school level to the tertiary level and NYSC.</p> <p>2.2.4.1.2 Hold Teachers/Lecturers' Anti-Corruption workshops.</p> <p>2.2.4.1.3 Introduction of Anti-corruption themes and courses in social studies in Primary and Secondary Schools and General studies at the Tertiary levels respectively.</p> <p>2.2.4.1.4 Hold pupils/students' competition about Anti-corruption issues.</p>	2.2.5.1 FME, ACAs, NUC, NBTE, NCCE, NUT, NYSC, NTI, NJI, CSOs, UBEC and NERDC.	<p>2.2.6.1 October 2018 September, thereafter Annually</p> <p>January 2019</p> <p>Annually</p>	2.2.7.1 Approved budget of the implementing agency supported by Development Partners.
	2.2.2.2 To sensitize public servants on corruption issues	2.2.3.2 Develop an Anti-Corruption training curricula for MDAs	<p>2.2.4.2.1 Ensuring the participation of Civil Servants at periodic training on corruption issues and code of conduct.</p> <p>2.2.4.2.2 Incorporating or strengthening modules on corruption studies in formal management development programs for Civil/Public Servants.</p>	2.2.5.2 OHCSF, BPSR, ACTUs, NIPSS, NIM, NILDS and PSIN	<p>2.2.6.2 Quarterly</p> <p>October 2018</p>	2.2.7.2 Approved budget of the implementing agency supported by Development Partners.

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 2: Mainstreaming Anti Corruption Principles into Governance and Service Delivery						
2.2.1.1 Improved communication channels	2.2.2.3 To increase access to information and reporting channels	2.2.3.3 Establish or improve Information, Education, and communication (IEC) strategy	<p>2.2.4.1.1 Development of IEC materials on existing laws and institutions against corruption.</p> <p>2.2.4.1.2 Creation of a safe reporting and feedback mechanisms in all ACAs, MDAs and LEAs.</p> <p>2.2.4.1.3 Establishment of an accessible open source database for MDAs reports</p>	2.2.5.1 ACAs, LEAs, MDAs, NOA, FMIC, NCC, OHCSF, BPSR, ACTUS	<p>2.2.6.1 October, 2018</p> <p>July 2018</p> <p>July 2018</p>	2.2.7.1 Approved budget of the implementing agency.
Level 3: Mainstreaming Anti-Corruption Principles into Sub-National Administration						
2.3.1.1 Improved Public awareness of corruption and its implications	2.3.2.1 To create awareness about corruption at the State and Local government levels	2.3.3.1 Replicate the initiatives at the Federal in the State and the Local governments	<p>2.3.4.1.1 Develop school curricula at all levels of education to accommodate corruption related issues.</p> <p>2.3.4.1.2 Implementing a training program on ethics and corruption issues for the teachers and lecturers of state owned schools as well as the private owned institutions/schools.</p> <p>2.3.4.1.3 Conducting extensive Anti-Corruption education for staff of all State MDAs and the private sector.</p> <p>2.3.4.1.4 Creation of safe reporting and feedback mechanisms in all State MDAs.</p>	2.3.5.1 FME, State school Board, UBEB, NUT, NTI, State HOS, State Ministry of Information (SMI), SSG, State MDAs, CSOs, Media and Private Sector.	<p>2.3.6.1 April 2019</p> <p>September 2018, thereafter annually</p> <p>October 2018, thereafter annually</p> <p>October 2018</p>	2.3.7.1 Approved budget of the implementing agency supported by Development Partners.

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 3: Mainstreaming Anti-Corruption Principles into Sub-National Administration						
	2.3.2.2 To engage CSOs and the Media in Public Engagement	2.3.3.2 Strengthen synergies between the Government, CSOs and the media	<p>2.3.4.2.1 CSOs to undertake advocacy for passage of Anti-corruption legislations.</p> <p>2.3.4.2.2 CSOs and media to provide awareness on NACS and OGP and support effective implementation of these initiatives.</p> <p>2.3.4.2.3 CSOs and media to create awareness and disseminate key findings and recommendations from CRAs and system study conducted on MDAs.</p> <p>2.3.4.2.4 CSOs to assist in civil education and research on Anti-corruption issues.</p> <p>2.3.4.2.5 Capacity development for media on investigative journalism.</p> <p>2.3.4.2.6 Capacity development for CSOs and Media on the use of info-graphics and other visuals for providing information and awareness about the fight against corruption.</p> <p>2.3.4.2.7 Formation of a coordinating group (CSOs, NOA and Media) for national awareness campaign and implementation of the awareness campaign.</p>	2.3.5.2 CSOs, Media, ACAs, State Ministry of Information, NUJ, State FMOJ, State Anti-Corruption Agencies, Nigerian Guild of Editors(NGE), NOA, States Ministry of Budget & Planning and other relevant stakeholders	<p>2.3.6.2 Ongoing Quarterly</p> <p>Annually</p> <p>Annually</p> <p>Annually</p> <p>Annually</p> <p>October, 2018</p>	2.3.7.2 Approved budget of the implementing agency supported by Development Partners.
	2.3.2.3 To increase the participation of the Non- State Actors	2.3.3.3 Sensitize the Non-State actors on corruption	<p>2.3.4.3.1 Mobilize FBOs & Community leaders to preach against corruption.</p> <p>2.3.4.3.2 Develop Public Traditional Partnership in the fight against corruption.</p> <p>2.3.4.3.3 Sensitization of Private entities and professional bodies on corruption.</p>	2.3.5.3 Christain Association of Nigeria (CAN), Nigerian Supreme Counsel for Islamic Affairs (NSCIA), National Council for Traditional Rulers in Nigeria (NCTRN) CSOs, SGF/SSG	<p>2.3.6.3 Ongoing</p> <p>January 2019</p> <p>Ongoing</p>	2.3.7.3 Approved budget of the implementing agency supported by Development Partners.

TECHNICAL OBJECTIVE 3: ETHICAL RE-ORIENTATION

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 1: Strengthening the legal and Institutional Framework for Ethical Re-orientation						
<p>3.1.1.1 Ethical Rebirth and National re-orientation</p>	<p>3.1.2.1 To develop policies to incentivize the participation of every sector of the society in Ethics and values initiatives by Government</p>	<p>3.1.3.1 Effective implementation of the National Ethics Policy</p>	<p>3.1.4.1.1 Review of ICPC's National Ethics Policy. 3.1.4.1.2 Partnering with the AGF for the ratification and adoption of the Policy by Federal Executive Council. 3.1.4.1.3 Public launch and presentation of the Policy. 3.1.4.1.4 Sensitization of the stakeholders on the Ethics Policy. 3.1.4.1.5 Full implementation of the Policy.</p>	<p>3.1.5.1 ICPC, FMOJ, FMIC, NOA, CBOs, FBOs, Traditional rulers, Media, CSOs including Professional Bodies, etc.</p>	<p>3.1.6.1 July 2018 August 2018 September, 2018 Ongoing Ongoing</p>	<p>3.1.7.1 Approved budget of the implementing agency supported by Development Partners.</p>
	<p>3.1.2.2 To instill ethics and good moral values and integrity in ACAs, LEAs and Criminal Justice Sector</p>	<p>3.1.3.2 Quarterly ethics training for staff of ACAs, LEAs Criminal Justice sector</p>	<p>3.1.4.2.1 Development or review of Codes of Ethics of the relevant organizations. 3.1.4.2.2 Training on the National Ethics Policy. 3.1.4.2.3 Training on the Code of Conduct for Public officers. 3.1.4.2.4 Ethics training for the Criminal Justice sector 3.1.4.2.5 Ethics training for Judicial officers and their support staff</p>	<p>3.1.5.2 ACAs, LEAs, NJC, NJI, Police and Prisons Training Academies, NBA,</p>	<p>3.1.6.2 July 2018 October 2018 Annually Annually Annually</p>	<p>3.1.7.2 Approved budget of the implementing agency supported by Development Partners.</p>

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 1: Strengthening the legal and Institutional Framework for Ethical Re-orientation						
3.2.1.1 Ethical Re-birth and National Re-Orientation	3.2.2.1 Instill ethics, good moral values and integrity in governance and service delivery	3.2.3.1 Quarterly ethics training for staff of the MDAs	<p>3.2.4.1.1 Development or review of codes of ethics of the MDAs.</p> <p>3.2.4.1.2 Training on the code of conduct for public officers.</p> <p>3.2.4.1.3 Ethics training for MDAs staff.</p> <p>3.2.4.1.4 Training on National Ethics Policy.</p>	3.2.5.1 MDAs, OHCSF, BPSR, CCB, ICPC, ACTUs	<p>3.2.6.1 July 2018</p> <p>Quarterly</p> <p>Quarterly</p> <p>Annually</p>	3.2.7.1 Approved budget of the implementing agency supported by Development Partners.
	3.2.2.2 To introduce ethics and moral values from the cradle.	3.2.3.2 Identify and promote National values as core values for the society.	<p>3.2.4.2.1 Review of the National Values Curriculum to identify gaps.</p> <p>3.2.4.2.2 Conduct assessment of the status of both the content and availability for different levels of education and challenges to previous implementation.</p> <p>3.2.4.2.3 Develop new textbooks and teaching aids.</p> <p>3.2.4.2.4 Train the teachers in the use of the resource materials.</p> <p>3.2.4.2.5 Deploy the materials to all levels of educational systems.</p>	3.2.5.2 FME, ICPC, NUT, UBEC, NTI, NERDC, NUC, MBTE, NCCE	<p>3.2.6.2 July 2018</p> <p>July 2018</p> <p>January 2019 February – August 2019 September 2019</p>	3.2.7.2 Approved budget of the implementing agency supported by Development Partners.

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 3: Mainstreaming Anti-Corruption Principles into Sub-National Public Administration						
3.3.1.1 Improved Ethical standard in the sub-National levels	3.3.2.1 To establish ethical standard and improve those that exist	3.3.3.1 Replicate the initiatives of the Federal level	<p>3.3.4.1.1 Adoption and implementation of the Ethics Policy.</p> <p>3.3.4.1.2 Development or review of Codes of Ethics for state MDAs and LG employees.</p> <p>3.3.4.1.3 Ethics training for State MDAs and Local Government staff.</p> <p>3.3.4.1.4 Introduction of National values curriculum into all levels of the educational system at the State-owned schools.</p> <p>3.3.4.1.5 Full implementation of ICPC/LG Integrity Initiative and Integrity Guide for Youth Corps Members.</p> <p>3.3.4.1.6 CSOs and Media to create awareness of the policy.</p> <p>3.3.4.1.7 Development or review and implementation of CSOs and Media codes of Ethics.</p> <p>3.3.4.1.8 Implementation of the Policy at all sectors of the society.</p>	3.3.5.1 ICPC, States MOJ, MDAs, State Heads of Service, SSG, Nigerian Union of Local Government Employees, Chairmen LGAs, UBEB, State school Boards, State Ministry of Education, Ministry of Information and Culture, CSOs, Media, Private Sector, FBOs, Federal Ministry of Women and Social Development, Federal Ministry of Youth and Sports Development CBOs, Traditional rulers.	<p>3.3.6.1 April 2019</p> <p>July 2018</p> <p>Annually</p> <p>September 2019</p> <p>October 2018</p> <p>Ongoing</p> <p>July 2019</p> <p>Ongoing</p>	3.3.7.1 Approved budget of the implementing agency supported by Development Partners.

TECHNICAL OBJECTIVE 4: ENFORCEMENT AND SANCTIONS

Strategic Goals	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 1: Strengthening the legal and Institutional framework designed to prevent and combat corruption through enforcement and sanctions						
4.1.1.1 Improved Anti-Corruption enforcement and sanctions to deter corrupt practices	4.1.2.1 To strengthen enforcement and sanction legislations.	4.1.3.1 Ensure the development and enhancement or amendment of existing laws to enhance investigation and prosecution of corruption cases	<p>4.1.4.1.1 Enact, repeal, amend and review relevant Anti-corruption laws for improved enforcement and sanctions such as Witness Protection and Whistleblowers Bills, Proceeds of Crimes Bill, Special Crimes Court Bills among others.</p> <p>4.1.4.1.2 Implementation of the Administration of the Criminal Justice Act (ACJA).</p> <p>4.1.4.1.3 FMOJ to develop model instrument (policies, regulations) to guide the States and other institutions towards effective implementation of the ACJA.</p> <p>4.1.4.1.4 FMOJ to develop template for feedback mechanism for the Implementing Agencies.</p>	4.1.5.1 FMOJ, NASS, Judiciary, Nigeria Police Force, Nigeria Prisons Service, ACAs	<p>4.1.6.1 Ongoing</p> <p>Ongoing</p> <p>September 2018</p> <p>September 2018</p>	4.1.7.1 Approved budget of the implementing agency supported by Development Partners.
	4.1.2.2 To build the capacity of the relevant Agencies for effective investigation and prosecution of corruption cases.	4.1.3.2 Continuous capacity development programs, provision of adequate resources and work tools.	<p>4.1.4.2.1 Training on Management, Investigation and prosecution</p> <p>4.1.4.2.2 Training on handling of cases.</p> <p>4.1.4.2.3 Training of Judges/Prosecutors, Lawyers, Criminal Justice operators (MOJ, Police, prisons officers, judiciary) on the ACJA.</p> <p>4.1.4.2.4 Capacity development training for drafters of legal departments of FMOJ, NASS, Nigeria Law Reforms Commission on legislative review and drafting.</p> <p>4.1.4.2.5 Establish a fully equipped model statement taking rooms in police stations</p>	4.1.5.2 ACAs, LEAs, Judiciary, FMOJ, Nigeria Law Reform Commission, NBA, NJC, National, NASS, FMF, National Institute for Legislative & Democratic Studies, (NILDS), Justice Sector Reform	<p>4.1.6.2 Ongoing</p> <p>Annually May-August 2018</p> <p>Annually</p> <p>October 2018</p>	4.1.7.2 Approved budget of the implementing agency supported by Development Partners.

Strategic Goals	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 1: Strengthening the legal and Institutional framework designed to prevent and combat corruption through enforcement and sanctions						
			<p>and fully equipped witness support room in the designated courts.</p> <p>4.1.4.2.6 Development of a case tracking/management system within the Criminal justice institutions.</p> <p>4.1.4.2.7 Development of a template for monitoring lawyers and training for court clerks on how to use the template.</p> <p>4.1.4.2.8 Development of templates/frameworks for administering custody of detainees by the Police or other Security Agencies.</p> <p>4.1.4.2.9 Develop and implement complaints and feedback mechanisms for users and victims</p> <p>4.1.4.2.10 Training the Justice Sector Reform Team on the Administration of Criminal Justice Committee for effective implementation of ACJA.</p> <p>4.1.4.2.11 Government to substantially increase the funding for the ACAs and the criminal justice sector</p>	Team	<p>August 2018</p> <p>August 2018</p> <p>August 2018</p> <p>August 2018</p> <p>August 2018</p> <p>Annually</p>	
	4.1.2.3 To improve the efficiency of adjudication and sanctioning	4.1.3.3 Improving the functioning of the court processes and addressing key concerns of citizens in	<p>4.1.4.3.1 Objectivity, transparency and consideration of ethical criteria should be maintained in the appointment of Judges and Anti-corruption lawyers.</p> <p>4.1.4.3.2 Establishment of Special courts for Anti-corruption and related cases.</p> <p>4.1.4.3.3 Strengthening of Code of Conduct Tribunal. Expansion of the constitution of membership from three (3) to seven (7) and capacity building etc.</p>	4.1.5.3 ACAs, LEAs, Judiciary, FMOJ, NBA, NJC. NASS, State NASS.	<p>4.1.6.3 Ongoing</p> <p>May 2019</p> <p>October-May 2019</p>	4.1.7.3 Approved budget of the implementing agency supported by Development Partners.

Strategic Goals	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 1: Strengthening the legal and Institutional framework designed to prevent and combat corruption through enforcement and sanctions						
		the handling of corruption matters.	<p>4.1.4.3.4 Automation of court processes.</p> <p>4.1.4.3.5 Development and implementation of e-justice program.</p> <p>4.1.4.3.6 Implementation of Sentencing Guidelines and corruption case management manual should be adopted and applied by courts at all levels</p> <p>4.1.4.3.7 NJC to review current judicial performance standards and mechanisms and close the identified gaps.</p> <p>4.1.4.3.8 Establishment of an independent judicial performance assessment mechanism for increasing oversight of the judiciary.</p> <p>4.1.4.3.9 Naming and shaming of corruption convicts.</p>		<p>October 2018</p> <p>October 2018</p> <p>July, 2018</p> <p>July 2018</p> <p>July 2018</p> <p>Quarterly</p>	
	4.1.2.4 To conclude corruption cases pending in the courts by 2019	4.1.3.4 Create a conducive environment for reporting of corruption related cases.	<p>4.1.4.4.1 Lobby Media houses to participate by allocating slots for revisiting reporting of those corruption related issues.</p> <p>4.1.4.4.2 Conduct a study to ascertain what causes delays or failures in corruption cases including profiling of the Judges and lawyers handling corruption cases and their antecedents.</p> <p>4.1.4.4.3 Research and update the list of high profile corruption cases that have lingered or stalled to serve as advocacy reference.</p> <p>4.1.4.4.4 Establishment of Online-Portal containing all corruption cases with full details of investigation reports, proof of</p>	4.1.5.4 ACAs, Judiciary, NBA, NJC, FMOJ, Media, CSOs,	<p>4.1.6.4 Ongoing</p> <p>July 2018</p> <p>July 2018</p> <p>September 2018, thereafter ongoing</p>	4.1.7.4 Approved budget of the implementing agency supported by Development Partners.

Strategic Goals	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 1: Strengthening the legal and Institutional framework designed to prevent and combat corruption through enforcement and sanctions						
			<p>evidence, disclosed witness(es), prosecution counsels and status of the cases.</p> <p>4.1.4.4.5 Prepare schedule of pending cases to present for special court sessions.</p> <p>4.1.4.4.6 Organize special court sessions for timely resolution of corruption cases.</p> <p>4.1.4.4.7 Improve on timely hearing of corruption cases and apply maximum penalty sentences avoiding payment options.</p> <p>4.1.4.4.8 Devise mechanisms for protecting and rewarding of whistleblowers and witnesses to facilitate reporting and prosecution of corruption related incidents.</p> <p>4.1.4.4.9 Courts to maintain transparency in prosecution of corruption cases.</p>		<p>July 2018</p> <p>May 2018- January 2019</p> <p>Ongoing</p> <p>July 2018</p> <p>Ongoing</p>	
	4.1.2.5 To improve synergy among ACAs, and the Criminal Justice Sector	4.1.3.5 Strengthen cooperation and coordination of enforcement and sanctions actions among the ACAs and Criminal Justice Sector	<p>4.1.4.5.1 Implementation of the Nigerian Financial Intelligence Act</p> <p>4.1.4.5.2 Strengthening of NFIU through capacity building (Intelligence Management training etc.) and Resource support.</p> <p>4.1.4.5.3 Identification of areas of overlap and streamlining the functions of the concerned agencies.</p> <p>4.1.4.5.4 Development of a Joint Anti-Corruption and Criminal Justice platform for coordination, information sharing and monitoring and evaluation.</p>	4.1.5.5 NFIU, IATT, Judiciary, Nigeria Prisons Service, NCC	<p>4.1.6.5 Ongoing July 2018</p> <p>July 2018</p> <p>January 2019</p>	4.1.7.5 Approved budget of the implementing agency supported by Development Partners.

Strategic Goals	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 2: Mainstreaming Anti-Corruption Principles into Governance and Service delivery						
4.2.1.1 Improved enforcement and sanctions in governance and service delivery to deter corruption	4.2.2.1 To increase effective enforcement of anti-corruption measures	4.2.3.1 Promote transparency and accountability in Public sector.	<p>4.2.4.1.1 Monitor the implementation of the Public Procurement Act 2007.</p> <p>4.2.4.1.2 Establish mechanisms for monitoring and evaluation of adherence to the provisions of Act.</p> <p>4.2.4.1.3 Enforce sanctions against organizations that fail to achieve recommended minimum standards of PPA 2007.</p> <p>4.2.4.1.4 BPP to make provisions for a register of business entities or organizations barred from government contracts.</p> <p>4.2.4.1.5 BPP to partner with Auditor-General of the Federation for more coordinated actions against procurement fraud.</p> <p>4.2.4.1.6 Enforce sanctions for MDAs that is in breach of compliance with establishment of ACTUs, ICPC's MDAs Ethics and compliance Scorecard, NACS, OGP, Freedom of Information requests etc.</p> <p>4.2.4.1.7 Enforce mandatory declaration of assets for MDAs, Political officers, NASS, Judges and their support staff.</p> <p>4.2.4.1.8 Enforce sanctions for non-compliance with annual declaration of assets.</p> <p>4.2.4.1.9 FIRS to enforce mandatory verification of Tax Clearance Certificate, prosecution of forgery and non-compliance by MDAs.</p>	4.2.5.1 BPP, ICPC, MDAs, TC-NACS, OGP Secretariat, OHCSF, BPSR FMOJ, FIRS, CCB	<p>4.2.6.1 Ongoing</p> <p>July 2018</p> <p>Ongoing</p> <p>July 2018 and subsequently updated</p> <p>July 2018</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	4.2.7.1 Approved budget of the implementing agency supported Development Partners.

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 3: Mainstreaming Anti-Corruption Principles into Sub-National Public Administration						
<p>4.3.1.1 Improved enforcement and sanctions at the sub-national level to deter corruption</p>	<p>4.3.2.1 To ensure effective enforcement of anti-corruption measures</p>	<p>4.3.3.1 Scale down anti-corruption initiatives to all levels</p>	<p>4.3.4.1.1 Adoption and implementation of Administration of Criminal Justice Law. 4.3.4.1.2 Training of the Justice Sector Reform Team and relevant stakeholders on Administration of Criminal Justice Law (ACJL) for effective implementation. 4.3.4.1.3 CSOs to create awareness and support effective adoption and implementation of NACS, OGP principles, FOIA, ACJA/ACJL. 4.3.4.1.4 CSOs to review and update the research on high profile corruption cases hibernated or gone to sleep to catalyze public attention and priority 4.3.4.1.5 CSOs and Media to monitor all corruption cases especially high profile cases. 4.3.4.1.6 Implementation of Bank Employees etc (Declaration of Assets) Act and extension of application to other classes of persons through a Presidential Order. 4.3.4.1.7 State Public Procurement Agencies to monitor the implementation of PPL and enforce sanctions against organizations that fail to comply with the provisions of the law. 4.3.4.1.8 Advocacy for the adoption of State Public Procurement Law and/or the establishment of the Procurement Agency in State(s).</p>	<p>4.3.5.1 SJC, Judiciary, MOJ, OSGF, PPA, States Public Procurement Agency, CSOs, Media, Justice Sector Reform Team.</p>	<p>4.3.6.1 Ongoing Ongoing May-October 2018, thereafter annually August 2018 Ongoing May 2019 Ongoing Ongoing</p>	<p>4.3.7.1 Approved budget of the implementing agency supported by Development Partners.</p>

TECHNICAL OBJECTIVE 5: RECOVERY AND MANAGEMENT OF PROCEEDS OF CRIME

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 1: Strengthening the Legal and Institutional Framework for Recovery and Management of Proceeds of Crime						
<p>5.1.1.1 Improved recovery and management of Proceeds of Crime</p>	<p>5.1.2.1 To ensure efficient and transparent management of recovered assets</p>	<p>5.1.3.1 Establishment of an Asset Management Agency</p>	<p>5.1.4.1.1 Review prevention policies of ACAs and LEAs with Asset Recovery mandate to identify overlapping mandates and find the solutions to them. 5.1.4.1.2 Passage and implementation of Proceeds of Crime Bill. 5.1.4.1.3 Building the capacity of Asset Recovery Management Agency and the Central Authority Unit (Non-Conviction based asset Forfeiture regime etc.). 5.1.4.1.4 Monthly publication of reports of recovered assets and utilization in at least three (3) National dailies and also electronic media. 5.1.4.1.5 Annual audit of the recovered assets account by the OAuGF. 5.1.4.1.6 Implementation of the Mutual Legal Assistance Act to enhance the ability to recover proceeds of crime</p>	<p>5.1.5.1 ACAs, NASS, FMOJ, The Executive, NCS, LEAs, AMA, CBN, NAPTIP, OAuGF, Media Houses.</p>	<p>5.1.6.1 July 2018 October 2018 October 2018 Monthly Ongoing Ongoing</p>	<p>5.1.7.1 Approved budget of the implementing agency supported by Development Partners.</p>
Level 2: Mainstreaming Anti-Corruption Principles into Governance and Service Delivery						
<p>5.2.1.1 To improve recovery and management of proceeds of crime</p>	<p>5.2.2.1 To ensure efficient and transparent management of recovered assets</p>	<p>5.2.3.1 To ensure the passage of the POC Bill and the establishment of AMA.</p>	<p>5.2.4.1.1 Development of mechanisms for public asset management 5.2.4.1.2 Establishment of public central register of beneficial owners of companies. 5.2.4.1.3 Establishment of a Central Asset Data Base 5.2.4.1.4 Establishment of a Depository for Forfeiture Order.</p>	<p>5.2.4.1 ARMU, FMOJ, CAC.</p>	<p>5.2.5.1 July 2018 July 2018 July 2018 July 2018</p>	<p>5.2.6.1 Approved budget of the implementing agency supplemented by Development Partners' Support.</p>

Strategic Goal	Objective	Strategy	Key Activities	Implementing Agency	Timeline	Required Resources
Level 3: Mainstreaming Anti-Corruption Principles into Sub-National Public Administration						
5.3.1.1 Improved recovery and management of proceeds of crime	5.3.2.1 To ensure that recovered assets are managed for the good of the Nigerian people.	5.3.3.1 Direct the use of recovered assets for Sustainable Development Goals (SDGs).	5.3.4.1.1 CSOs and Media to monitor the management of recovered stolen assets to ensure that it put into proper use. 5.3.4.1.2 States and LGs to develop and enhance mechanisms for public asset management.	5.3.5.1 CSOs, Media, State and Local Government, Private sectors, the General public	5.3.6.1 Ongoing October 2018	5.3.7.1 Approved budget of the implementing agency supplemented by Development Partners' Support.

