

AN EVALUATION OF THE NIGERIAN NATIONAL ANTI CORRUPTION STRATEGY¹

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ABSTRACT

One of the most under-stated, but most important elements of governance of any nation should be unequivocal commitment to tackling corruption. In Nigeria, corruption as elsewhere is a complex and multifaceted problem that cannot be solved in isolation. It suppresses economic growth and undermines the sustainable management of natural resources. It breaches fundamental human rights, undermines national security, exacerbates poverty and promotes instability by diverting funds from health care, education and other basic services. The cruel effect of corruption is felt by millions of Nigerians. In recognition of this insurmountable task, one of the campaign promises of this administration during the 2015 elections was to aggressively clamp down on corruption by presenting a National Anti-corruption Strategy (NACS). Indeed, on July 5, 2017, the Federal Executive Council approved the NACS for the first time in the history of Nigeria as a Nation. The Strategy is an insight into the government's fight against corruption and a guide to all sectors and stakeholders' in the fight against corruption. This article shall give an overview of the NAC; it will give an analysis as to whether the NACS meets international best practice; and the role of relevant stakeholders in its implementation.

Keywords: NACS, Nigeria, Corruption.

INTRODUCTION

Corruption in its diverse forms remains a central challenge to sustainable development and there is no universally accepted definition for corruption. Attempts to develop such a definition invariably encounter legal, criminological and, in many countries, political problems. Different countries and indeed different people perceive corruption differently, what may be deemed corruption by one person may not be corruption to other. Corruption occurs at all levels of the society and ranges from petty corruption to grand corruption. The causes of these corruptions differ as well and have been attributed to greed, need, opportunity, impunity, lack of the implementation of sanctions and punishment, cultural factors e.t.c.

In academic corruption literature, a distinction is often made between classic and modern conceptions of corruption. The classic conception of corruption dates back to Aristotle's and Plato's times and has a moral meaning: it refers to a moral decadence of human and society, which is caused by an excessive concentration of power. The modern meaning of corruption is narrower, more value-free, and is based on the characteristic of a modern state, the

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separation of public and private. It is understood as a twisted relationship between state and society.²

The author believes that the moral meaning of corruption is what is applicable to Nigeria because of the soaring level of moral decadence in the society. Transparency International (TI) defines corruption as “the abuse of entrusted power for private gain”. This definition represents a broader phenomenon where private agents also share responsibility with public servants.

In the Nigeria context, corruption as elsewhere is a complex and multifaceted problem that cannot be solved in isolation. The reality of the effects of corruption is the socio economic threats it poses to Nigeria as a nation. It suppresses economic growth and undermines the sustainable management of natural resources. It breaches fundamental human rights, undermines national security, exacerbates poverty and promotes instability by diverting funds from health care, education and other basic services. The cruel effect of corruption is felt by millions of Nigerians.

One of the most under-stated, but most important elements of governance of any nation should be unequivocal commitment to tackling corruption. In recognition of this insurmountable task, one of the campaign promises of this administration during the 2015 elections was to aggressively clamp down on corruption by presenting a National Anti-corruption Strategy,³ which is in line with the United Nations Convention Against Corruption (UNCAC) of which Nigeria is a signatory to.

Under UNCAC, States parties to the Convention must undertake effective measures to prevent corruption,⁴ criminalize corrupt acts and ensure effective law enforcement,⁵ cooperate with other States parties in enforcing anti-corruption laws⁶ and assist one another in the return of assets obtained through corruption.⁷

In addition to calling for effective action in each of these specific areas, article 5 imposes the more general requirements that each State party: (a) develop and implement or maintain effective, coordinated anti-corruption policies; (b) establish and promote effective practices aimed at the prevention of corruption; and (c) periodically evaluate relevant legal instruments and administrative measures with a view to determining their adequacy to prevent and fight corruption.

For many countries, achieving the objective of article 5(a) of UNCAC may entail the drafting, publication and implementation of a national anticorruption strategy; in other words a blueprint for a realistic, comprehensive and integrated plan for reducing corruption in that country. The United Nations Office on Drugs and Crime (UNODC) has identified over

² *Anti-corruption Handbook for Development Practitioners*, Ministry For Foreign Affairs of Finland, Department for Development Policy at pg 19.

³ *My Covenant with Nigerians*. [Accessed 21st August 2017] Available from <https://www.naij.com/403506-must-read-buharis-covenant-with-nigerians.html>

⁴ Chapter II, articles 7 to 14.

⁵ Chapter III, articles 15 to 42.

⁶ Chapter IV, articles 43 to 50.

⁷ Chapter V, articles 51 to 59.

seventy countries that have issued either a single national anti-corruption strategy or a set of documents that together constitute a comprehensive, coordinated anti-corruption framework.⁸ Based on the foregoing, On July 5th 2017, in fulfillment of the promise the President made to Nigerians, the National Anticorruption Strategy (NACS) 2017 – 2021, was approved by the Federal Executive Council. The NACS will be used as a guide by all sectors and stakeholders' in the fight against corruption.

The aim of this article is to give an overview of the NACS, an analysis as to whether the NACS meets international best practice and the role of relevant stakeholders in the implementation of the NACS. This article is divided into five parts. Part one introduces the essence of the article. Part 2 is largely descriptive. It describes the evolution of the NACS, from conception to approval.

Part 3 and 4 analyzes the NACS. Part 3 gives an overview of the NACS and measures the standard of the strategy to international best practice using the UNODC guide for development and implementation as the base document. Part 4 discusses the role the various stakeholders will play in the successful implementation of the NACS. Finally, part 5 is prescriptive, positing that the NACS may not be perfect but it however provides a coordinated guide for all sectors and stakeholders in the fight against corruption. It also highlights some of the ongoing initiatives that are aligned to the objectives of the NACS.

THE EVOLUTION OF THE NATIONAL ANTI CORRUPTION STRATEGY DOCUMENT

In 2009, Nigeria volunteered as one of the fifteen countries to test- run the Self-Assessment Checklist on UNCAC, under the direction of the Conference of States Parties to the United Nations Convention against Corruption and for that purpose, a Working Group was convened on the platform of the Inter-Agency Task Team (IATT)⁹ which consist of twenty one members.¹⁰

Part of IATT's task was to develop a holistic National Strategy to combat corruption and an inter-agency working group (WG) was set up to develop a National Strategy to combat corruption which was inaugurated by the erstwhile Honorable Minister of Justice and Attorney General of the Federation in September 2009.¹¹ The Strategy when concluded and adopted by the IATT was submitted to the Honorable Attorney General of the Federation in February 2011 for consideration and approval by the Federal Executive Council, but this never happened.

⁸ United Nations Office on Drugs and Crime, *the United Nations Convention against Corruption, National Anti-Corruption Strategies: A Practical Guide for Development and Implementation*, 2.

⁹ Bureau for Public Service Reforms (BPSR), Bureau of Public Procurement (BPP), Central Bank on Nigeria (CBN), Code of Conduct Bureau (CCB), Corporate Affairs Commission (CAC), Economic and Financial Crimes Commission (EFCC), Federal Inland Revenue Service (FIRS), Federal Ministry of Finance (FMF), Federal Ministry of Justice (FMoJ), Fiscal Responsibility Commission (FRC), Independent Corrupt Practices and Other Related Offences Commission (ICPC), Ministry of Foreign Affairs (MFA), National Agency for the Prohibition of Traffic in Persons & Other Related Matters (NAPTIP), National Drug Law Enforcement Agency (NDLEA), Nigeria Extractive Industries Transparency Initiative (NEITI), Nigeria Financial Intelligence Unit (NFIU), National Human Rights commission (NHRC), The Nigeria Police Force (NPF), Office of the Auditor General for the Federation (OAuGF), Public Complaints Commission (PCC), Technical Unit on Governance and Anti-Corruption Reforms (TUGAR).

¹⁰ See the draft National Strategy To Combat Corruption of the Inter-Agency Task Team at pg. 7-9.

¹¹ Id at pg. 8

Now, between March and May of 2015, during the transition period, the then government in waiting of President Buhari prepared a draft National Anti corruption Plan (NACP) which was built upon the National Strategy to Combat Corruption that was developed by IATT and part of its many recommendation was the establishment of the Presidential Advisory Committee Against Corruption (PACAC) which was inaugurated in August 2015. Subsequently, PACAC was handed the NACP as a base document and insight into the government's anti corruption agenda.

PACAC was further directed to finalize the document in collaboration with all relevant stakeholders; the public sector, private sector and civil society organizations. However, PACAC decided to await the appointment of a Federal Attorney General and the NACP was submitted to the Attorney General in November 2015. In December 2016, yet another Anti Corruption Strategy document was developed by the Federal Ministry of Justice (FMOJ).

To allow for inclusiveness, a series of meetings were organized by PACAC and FMOJ to gauge the opinion of all relevant stakeholders on the respective National Anticorruption Strategy documents¹² and a Stakeholders' Consultative Meeting was held in Abuja on March 14th 2017.¹³ The aim of the meeting was to deliberate on the harmonization of the three Anti Corruption Strategy document with the intent of producing one unified and holistic National Anti Corruption Strategy document.¹⁴ After the meeting, a small consistency group was put together for the purpose of a final harmonization of the Strategy document based on the deliberations from the stakeholders' consultative meeting.

The next step was the Adoption/Validation Meeting of the Harmonized NACS, which held in Abuja on the 27th of April 2017.¹⁵ The aim of the meeting was to adopt and validate the harmonized National Anti Corruption Strategy by all stakeholders for onward submission by the Honorable Attorney General of the Federation to the Federal Executive Council for approval.¹⁶ The final step was the adoption of the NACS by the Federal Executive Council.

OVERVIEW OF THE NATIONAL ANTI CORRUPTION STRATEGY

One purpose of developing a National Anticorruption Strategy is to help generate and maintain the necessary leadership and broad support required to effectively curb corruption

¹² 1. IATT draft National Strategy To Combat Corruption ; 2. PACAC National Anticorruption Plan (2015 – 2017); 3. FMOJ Nigeria Anti – Corruption Strategy (NACS) 2017 - 2020

¹³ The meeting was attended by representatives of Economic Financial Crimes Commission (EFCC), Independent Corrupt Practices Commission (ICPC), Code of Conduct Bureau (CCB), Technical Unit on Governance and Anticorruption Reforms (TUGAR), Special Control Unit Against Money Laundering (SCUML), Ministry of Finance, Federal Inland Revenue Service, Ministry of foreign Affairs, Corporate Affairs Commission, Nigerian Financial Intelligence Unit (NFIU), Public complaints Commission (PCC), Central Bank of Nigeria (CBN), Center for Fraud Awareness, Bureau of Public Procurement (BPP), Bureau of Public Service Reforms (BPSR), Nigerian Labour Congress(NLC), Fiscal Responsibility Commission, National Agency for the Prohibition of Trafficking in Persons (NAPTIP), Trade Union congress (TUC) and Civil Society Organizations, FMOJ and PACAC.

¹⁴ Report of the meeting on file with PACAC and FMOJ.

¹⁵ The meeting was attended by a representative of the Senate President of Nigeria, representative of the Honourable Attorney-General of Federation and Minister of Justice, Solicitor –General of the Federation, Director Public Prosecution of the Federation, President of the Court of Appeal, Chief Judge of the Federal High Court, Representative of the FCT High Court, Chairman of ICPC, Chairman of the Code of Conduct Bureau, Director-General of NAPTIP, representative of the various Anti Corruption agencies, CSOs, Media, FMOJ and PACAC.

¹⁶ Report of the meeting on file with PACAC and FMOJ.

and it is important to bear these in mind at the developmental stage of any Strategy. Responding to a request by the Conference of the States Parties to UNCAC¹⁷ to identify and disseminate good practices among States parties regarding the development of National Anticorruption Strategies, UNODC came up with a Guide.¹⁸

According to the Guide, which offers recommendations to countries considering drafting or revising a national anti-corruption strategy, it provides five key aspects of an effective national anti-corruption strategy document:

*the drafting process for the strategy should be overseen by a body that has sufficient autonomy, expertise and political backing, and should involve substantive input from key stakeholders from both inside and outside the Government; the strategy should contain a preliminary evaluation and diagnosis of the main corruption challenges that the country faces, including the obstacles to the implementation of an effective anti-corruption policy; the preliminary diagnosis should also identify gaps or limitations in current knowledge or understanding of those issues; based on the preliminary evaluation and diagnosis, the strategy should contain an anti-corruption policy that lays out ambitious but realistic objectives, identifies top priorities in both the near term and longer term and establishes the appropriate sequencing of reforms; the strategy should include an implementation plan in which responsibility for overseeing its execution is assigned to a coordination unit and mechanisms to ensure the various agencies carrying out different aspects cooperate with one another are provided for; the strategy should contain a plan for monitoring and evaluating the plan's implementation and impact to ensure that the elements of the policy plan are properly executed, that they are having the desired impact and that they can be revised as necessary.*¹⁹

It is however important to note that these are mere recommendations and good practices among State parties in the development of a NACS. Existing NACS of various countries vary widely in detail and scope and this is because there is no one size fits all approach to emulate when producing a strategy document due to the peculiarities of different countries with their different sovereignties. The question here is, did Nigeria, take into cognizance these recommendations in the development of its NACS? Before this article addresses that question, let me give an overview of the NACS.

The NACS seeks to develop and implement mechanisms aimed at improving the governance of public institutions at Federal, State and Local government levels and removing corruption related factors inhibiting their accessibility and capacity to deliver quality services to Nigerians. In order to align with the NACS, each Anti-Corruption, Law Enforcement and Regulatory Agency will develop or update its strategic plan and also develop an Implementation Plan that clearly defines key activities, expected deliverables and timelines for all its operating units.

At the level of private sector and society as a whole, the NACS promotes the establishment of ethical standards where they do not exist, and improve enforcement of such standards where

¹⁷ See CAC/COSP/2009/15, sect. I.A, resolution 3/4, entitled "Technical assistance to implement the United Nations Convention against Corruption".

¹⁸ As custodians of UNCAC, this is consistent with the responsibility of UNODC to provide technical assistance to States parties to help them meet their obligations under the Convention.

¹⁹ United Nations Office on Drugs and Crime, the United Nations Convention against Corruption National Anti-Corruption Strategies A Practical Guide for Development and Implementation at Pg 3.

they exist. The NACS promotes ethical orientation for improved personal ethics and ethical conduct in nation building, which will guide citizens.

The NACS is designed to intervene at the legal, policy, technical and institutional levels within the public and private sectors. At the policy level, the objective is to put in place a system which promotes an increased alignment of private and public interests, while at the Institutional level, the strategy aims to strengthen the effectiveness, efficiency, and synergy of the institutions, laws, and measures designed to prevent and combat corruption as well as engage the public more actively.

It promotes a multi-pronged approach with an initial focus on strengthening the capacities of the dedicated anti-corruption and public accountability bodies; mainstreaming of anti-corruption and governance principles into the work of the Ministries, Departments and Agencies (MDAs) at the federal level; strengthening accountability, integrity and transparency at the state and local government levels. The NACS outlines clear objectives of changing the logic of corruption and anti-corruption in Nigeria, by adopting an approach based on five pillars of prevention; public engagement; ethical re-orientation in the public and private sectors; enforcement and sanctions and Recovery and Management of Proceeds of Corruption.

To ensure effective implementation, the overall responsibility for implementation of the Strategy rests on the President of the Federal Republic of Nigeria and Commander-in-Chief of the Armed Forces. To assist with the coordination of the implementation, the President will establish a Ministerial Committee headed by the Attorney General of the Federation charged with the responsibility for the development of sector-specific strategies in line with the NACS. The Attorney General of the Federation, being the coordinating authority, may from time to time issue policy directives on the implementation of the Strategy.²⁰

At the State level, the responsibility for implementation of the Strategy rests on the Executive Governor of the State. In furtherance to this implementation, the Governor will establish a Ministerial Committee headed by the Attorney General of the State charged with the responsibility of implementing the NACS. At the Local Government level, the Chairmen of Council will be responsible for implementing the Strategy under the supervision of the Executive Governor of the State.

Regular monitoring, evaluating and reporting are essential if the NACS strategy is to have its desired effect. Monitoring provides the necessary data on the strategy's progress over time and periodic reporting helps citizens hold Government accountable for strategy results and inputs where necessary. The monitoring and evaluation component of the NACS is to facilitate the judicious allocation and use of resources and maximization of synergy amongst the Anti-Corruption, Law Enforcement and Regulatory Agencies and other Public Institutions as well as Non-State Actors. The Objectively Verifiable Indicators [OVI] will include interventions to address issues such as overlapping mandates, prioritization, and allocation of internal resources, inter-agency cooperation and collaboration.

²⁰ Exercising this authority, on July 21st, 2017, the Attorney General of the Federation inaugurated a small Technical Committee (TC) on the Implementation of the National Anti Corruption Strategy, with members drawn from different sectors. The mandate of the TC is to develop a robust road map for the implementation of the NACS and serve as secretariat for the Ministerial Committee.

The structures for monitoring implementation of the NACS will be: A NACS Monitoring and Evaluation (M&E) Committee established by the Attorney General of the Federation, comprising of members drawn from different sectors. Monitoring of the NACS implementation will be achieved at three levels: monthly reporting and quarterly self-assessments within Anti-Corruption, Law Enforcement and Regulatory Agencies; annual review of the progress of the implementation; annual review and reporting by the NACS M&E Committee, based on quarterly statistics sent by Anti-Corruption, Law Enforcement and Regulatory Agencies to the NBS, using a National Anti-corruption Data Reporting Template.

The review shall also take into account the periodic reports of Country Assessments conducted pursuant to Nigeria's obligations under UNCAC and other relevant reports; and The Attorney General of the Federation shall cause to be prepared, an "Annual National Anti-corruption Strategy Implementation Review Report" that shall be submitted to the Federal Executive Council, in respect of activities of the preceding year. The report shall include assessments of the level of implementation and challenges and make recommendations.

As to compliance to the UNODC recommendations, the initial drafting process of the NACS was overseen by IATT²¹ and within this small body, an inter-agency working group was set up to develop a National Strategy. The IATT has sufficient autonomy, expertise and political backing through PACAC and FMOJ. In addition, during the drafting process, there was substantive input from key stakeholders from both inside and outside the Government.

The NACS does not contain a detailed preliminary evaluation and diagnosis of the main corruption challenges that the country faces rather, it contains a brief summary of the corruption journey of Nigeria and this is contained in the NACS' preliminary pages. The intent was to maintain a positive vibe throughout the drafting process rather than regurgitate the cruel past.

Based on the preliminary evaluation and diagnosis, the strategy contains an anti-corruption policy that lays realistic objectives. It identifies top priorities in both the near term and longer term and establishes the appropriate sequencing of reforms. The NACS' top priorities is based on five pillars; prevention of corruption, public engagement, campaign for ethical reorientation, enforcement and sanctions, recovery of the proceeds of corruption. These pillars aligns with three objectives; policy, technical and institutional objectives. They are all interconnected as such they compliment each other. The NACS does not however include an implementation plan. At the time of writing this article the technical committee is yet to come up with a finalized implementation plan. The NACS contains a plan for monitoring and evaluating as discussed in the overview.

THE ROLE OF RELEVANT STAKEHOLDERS IN THE SUCCESSFUL IMPLEMENTATION OF THE NATIONAL ANTI CORRUPTION STRATEGY

It goes without saying that the most important element of an effective anti-corruption strategy is "political will". Without political, will or buy in from the highest level of government, the

²¹ Members are drawn from all the existing anti corruption agencies, law enforcement agencies and regulatory bodies.

fight against corruption will remain a fallacy.²² Now, honest political will by government involves adequate budgetary allocation to anti corruption institutions; enactment of anti corruption laws; support to the investigation of corruption cases especially High Profile Corruption Cases (HPCCs);²³ true independence and free from political interference of anti corruption institutions tasked with fighting corruption; zero tolerance across board towards the fight against corruption, it should not be a case of double standards or preferential treatment of some certain class of persons. Everyone should be and should be seen as equal before the eyes of the law.

The responsibility for implementing key actions geared towards prevention under the NACS rest on the Anti-Corruption, Law Enforcement and Regulatory Agencies. They are to ensure that MDAs strengthen their internal accountability and transparency by implementing periodic corruption risk assessments and systems review. The Anti-Corruption, Law Enforcement and Regulatory Agencies are expected to monitor the implementation of integrity plans and measures to address all identified risks and deficiencies.

The Anti-Corruption, Law Enforcement and Regulatory Agencies under the platform of IATT and in cooperation with the relevant Service Commissions at federal, state and local government levels, are to design/develop measures and mechanisms that will render public institutions more transparent and accessible; including the provision of regular feedback to the public on their operations.

For public enlightenment, the responsibility for implementing key actions under the NACS rest on the outreach and public awareness departments of the Anti-Corruption, Law Enforcement and Regulatory Agencies in collaboration with the Federal Ministry of Information and other relevant agencies. They will be responsible for driving the public engagement activities. Anti-Corruption, Law Enforcement and Regulatory Agencies will work with MDAs and Stakeholders following risk assessments to develop sector strategies and also agency specific measures to address identified risks and deficiencies.

For enforcement and sanctions, the responsibility for implementing key actions under the NACS is vested in the Office of the Attorney General of the Federation and the Anti-Corruption Law Enforcement and Regulatory Agencies in accordance with their

²² This present administration has clearly shown sufficient political will in combating corruption and it has shown that by the establishment of the Presidential Advisory Committee Against Corruption, Implementation of the Treasury Single Account, Whistle Blower Policy, the passage of the Mutual Assistance In Criminal Matters, an executive bill, Mutual Legal Assistance in Legal and Commercial Matters, Transfer of Sentenced Persons, various policies on transparency in doing business in Nigeria; establishment of the Presidential Committee on Asset Recovery, regular audits of Ministries, Departments and Agencies to clamp down on Ghost workers, prosecution of high profile corruption cases.....to mention a few.

²³ High Profile Corruption Case is defined by the Presidential Advisory Committee Against Corruption (PACAC), Plea Bargain Manual as – where the value involves cash or assets of a significant value and one or more of the following are present: any of the suspect is a politician, public officer or judicial officer; a person elected or nominated to a public office or position; where the subject matter of the case involves government property or funds; any allegation involving fraud against any government or corruption of its officials or involves the abuse of office; the subject matter has significant international dimension; involves specialized knowledge of financial, commercial, fiscal or regulatory matters; involves complex financial transactions that may involve cross border or multi – jurisdictional transactions or property movement; likely to be of widespread public concern; or alleged misconduct amounting to economic sabotage.

establishment laws and with technical support from relevant bodies²⁴ The Anti-Corruption, Law Enforcement and Regulatory Agencies with investigative and prosecutorial mandates will ensure inter-agency coordination of investigations and prosecutions in line with their statutory mandate.²⁵

The Federal Ministry of Justice, in consultation with the Anti-Corruption, Law Enforcement and Regulatory Agencies, the Law Reform Commission, and other relevant bodies will undertake the primary responsibility for the law reform measures. Improvements in the area of adjudication will be driven by the Judiciary and the Federal Ministry of Justice, in consultation with the relevant Anti-Corruption, Law Enforcement and Regulatory Agencies. Apart from the role of the ACAs in the successful implementation of the NACS, the most important stakeholder are the MDAs, which has an important role of setting the right precedence of ensuring it is itself free of corruption. Other stakeholders include the legislature, the private sector, professional bodies, civil organizations, the media and the general public.

CONCLUSION

There is no single solution in fighting corruption. Every country has to examine its unique circumstances and come up with a comprehensive strategy and the NACS is an entry point to finding solutions. Whilst the NACS is not completely perfect, it however provides a coordinated guide and insight for all sectors and stakeholders in the fight against corruption. Best practices of implementing NACS reveal that a successful NACS must include national ownership, knowledge and research based design, wide stakeholders' participation, effective coordination, monitoring and evaluation and only then can the performance of the NACS be fully achieved.

The NACS as it is, is already a walking talking document because some of its objectives were already in force before its approval by FEC. For instance, there are ongoing initiatives geared towards prevention of corruption,²⁶ campaign for ethical reorientation,²⁷ enforcement and sanctions²⁸ and recovery of the proceeds of corruption.²⁹

²⁴ Support is to be provided by the Presidential Advisory Committee against Corruption (PACAC) and Technical Unit on Governance and Anti-Corruption Reforms (TUGAR) in line with their Terms of Reference (TOR).

²⁵ Under the platform of the IATT.

²⁶ Open Contracting Data Standard (OCDS); Open Government Partnership (OGP); Extractive Industries Transparency Initiative (EITI); Beneficial Ownership; Justice Sector Reform; Public Service Reforms; Tax Reform; Illicit Financial Flows (TSA, cash less policy, Anti- money; laundering/counter terrorism financing etc.); Anti-Corruption and Transparency Unit (ACTU); Convention on Business Integrity Initiative; Ease of doing business executive orders; Petroleum Industry Reforms; Budget Transparency Initiatives; Corporate Governance Rating System e.t.c.

²⁷ The Change begins with me campaign, a Federal Government Initiative; Corruption Not in My Country Campaign, a Civil Society Organization Initiative, e.t.c.

²⁸ Passage of the Mutual Legal Assistance in Criminal Matters Act and Mutual Legal Assistance in Civil and Commercial Matters.

²⁹ Whistle Blowing Policy; the establishment of the Presidential Committee on Asset Recovery; The passage of the Whistle Blowers' Protection Bill, 2017, awaiting the Presidents assent.