CHAPTER 10

# SIGNIFICANCE OF KNOWLEDGE-DRIVEN AND EVIDENCE-BASED ANTI-CORRUPTION INTERVENTIONS

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## Introduction

The Independent Corrupt Practices and other Related Offences Commission (ICPC), strengthens its preventive and enforcement actions through knowledge derived from research. The Anticorruption Academy of Nigeria (ACAN) is the research and training arm of the ICPC. The Academy conducts anti-corruption research to support the work of the Commission. The research outputs of the Academy also help to enhance the knowledge and evidence base of the anti-corruption community.

In addition to formal research conducted at ACAN, the Commission also deploys applied research methods in reviewing systems, conducting risk assessments, etc. While the systems review and corruption risk assessments are not conventional research activities, the Commission applies certain formal research approaches in conducting the systems review and corruption risk assessments. Since other chapter(s) in this book are squarely on systems review and corruption risk assessments, this chapter will focus on formal research conducted at ACAN.

"The 'hidden' nature of corruption means that much corruption remains undetected."[1] The cases of corruption that are reported or investigated amount to a tiny fraction of incidents of corruption. Research, however, can serve to determine the nature and frequency of various manifestations of corruption in the country. Moreover, unlike investigations and prosecutions which are necessarily triggered by the alleged or actual occurrence of corrupt practices, research can provide the required knowledge and evidence to prevent future acts of corruption.[2]

Corruption allows people in power to confer unlawful benefits or corrupt advantages on themselves or their cronies. These unlawful benefits operate to not only empower the corrupt officials in perpetrating and perpetuating their corrupt practices, but also provide them with the resources to resist anti-corruption efforts. In this context, the corrupt official has two strong bases of operation. First, s/he has the power conferred by law, office or role (position). Second, s/he has the power acquired through the proceeds of corruption. So, the corrupt official is a powerful adversary that cannot be underestimated by anticorruption agents and agencies.

Given the power wielded by corrupt officials, anticorruption agents and agencies necessarily require sufficient power to be able to prevail in the clash between the forces of corruption and those of anti-corruption. Although it has been said that 'power flows from the barrel of the gun,' firearms, handcuffs and jail terms are not sufficiently powerful to overcome corruption. In addition to all other resources and tools, forces of anti-corruption require the power of knowledge. As it is said, 'knowledge is power.'

Knowledge empowers the forces of anti-corruption to appropriately and effectively utilise all the other tools and resources available against corruption. The required knowledge can be discovered during unplanned eureka moments; but the fortuitous and uncoordinated nature of this kind of knowledge makes it unreliable as a source of power for anti-corruption efforts. For example, after many years of investigating numerous cases, investigators may discover that suspects of a particular gender or age group are more likely to be protected by their communities.

Reliable power comes from knowledge produced by systematic research. ACAN conducts research projects using quantitative, qualitative and mixed methods to produce knowledge. This chapter highlights the significance of research projects at ACAN in the fight to diminish corruption. This introductory part gives an overview of the subject of discussion. The next part highlights the factors that allow ACAN to align its research to policy and decision making. Among others, it is noted that ACAN research succeeds in informing decision and policy making because it is near and accessible to decision and policy makers; it focuses on areas that are directly relevant to existing mandates and plans; it encourages input from a broad spectrum of stakeholders; it is not aimed at securing funds from sponsors and it

is disseminated in a manner that is usable by the decision makers concerned with the subject matter of research. The third part illustrates the nature of research at ACAN by highlighting four recent research projects conducted by ACAN. Finally, the fourth part rounds up with concluding thoughts and recommendations.

**Alignment of ACAN's Research to Policy and Decision Making**

Primarily, all ACAN research projects are evaluated by the extent to which they impact anti-corruption policy and decision making. Unlike research outputs that are measured by their degree of visibility, ACAN research is measured by the degree to which its findings and recommendations are applied by decision and policy makers. Therefore, "right from the point of conceptualising ACAN as a research and training institution, it was envisioned that the Academy should not focus on training alone but should also engage in the kind of research that can inform anticorruption policies" and guide decisions.[3]

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It should be noted that intelligence, at both tactical and strategic levels, is also relevant to decision making. However, intelligence operates on a different spectrum from research. So, while ACAN deals with research and training, other departments and units of the ICPC deal with intelligence. The ICPC's separation of intelligence from research functions allows ACAN's research to meet ethical standards of research, especially those relating to protection of participants and subjects of research. In addition, it encourages the participation of peers, respondents, key informants, persons in conflict with the law, discussants, and stakeholders who would be willing to engage in a research project but may be averse to supplying intelligence for law enforcement purposes.

**Avoiding Obstacles to Availability and Acceptability of Research to Policy and Decision Makers**

Certain obstacles make it difficult for policy and decision makers to use evidence produced through research. ACAN research projects are purposely designed to avoid the stumbling blocks which are highlighted below.

"**Misalignments between the research conducted and the evidence that is needed for decision-making.**"[4] For the evidence or knowledge obtained by a research project to be relevant to policy and decision makers, the research components consisting of subject matter, research questions and objectives must be relevant to plans, programmes, projects and activities of policy and decision makers. Unless the previously mentioned research components are aligned with plans, programmes, projects and activities, any evidence or knowledge contributed by the research will be of no use to policy and decision makers.

As a first step to avoiding disconnecting research outputs from the evidential needs of policy and decision makers, the subject matter of ACAN research projects are determined by two primary considerations. First, they are relevant to the statutory mandate of the ICPC and other ACAs. Second, they relate to international anticorruption obligations of Nigeria. So, as a starting point, ACAN research projects have subject matter relevance to the ICPC, ACAs and Government offices required to implement Nigeria's international anti-corruption obligations.

As a second step to making ACAN research projects directly relevant to decision and policy makers, the research questions, objectives and timelines are geared towards providing the evidence-base to guide specific actions that are demanded by law, strategy plans, and international documents. Thus, ACAN research outputs are positioned to provide timely evidence and knowledge required to guide policies and decisions. The research conducted at ACAN is geared at answering questions that policy and decision makers must tackle to make informed decisions. These answers are to be provided in good time to be relevant for the specific intervention in focus. Whereas, regular academic research can be done on any subject at any time, research at ACAN is required to be done within the time period that makes its output relevant to decisions or polices to be made on an existing or future action.

**Input from Stakeholders**. Most academic research projects are conceptualised, designed and executed by researchers without input from stakeholders. At best, some components of the research may be peer reviewed. On the contrary, virtually every phase of ACAN research is amenable to input from stakeholders. At the time the subject matter is being chosen, stakeholders have an input in suggesting if the subject is relevant to anticorruption in Nigeria. For large scale empirical research, ACAN research procedures require that stakeholders' comments are compulsory during conceptualisation, design and presentation of findings.

In selecting the stakeholders to contact for responses and comments, a balance is struck between actors from governmental offices, civil society, development partners, academia and general society. The method of interaction is usually electronic correspondence to individual stakeholders. However, if the research project requires cross-review of stakeholders' input, interaction will involve discussions between invited stakeholders.

**Focused on the Sole Aim of Advancing Anti-Corruption Interventions**. Researchers sometimes select the subject matter of research based on its potential to be funded by sponsors or donors. Areas may also be selected for research because of the passion of the researcher to further some personal courses or agenda. Naturally, the research publication in the above instances will not indicate these incentives for the research. Yet, the undeclared underlining incentives, which may well be legitimate, would have some influence on the researchers and their work.

Contrary to the above scenario, the research mandate of ACAN is limited to provision of knowledge and evidence for anticorruption work. Therefore, a subject cannot be chosen for research because of its potential for sponsored funding or merely because it is interesting.

**Communication of research outputs and results to policy and decision makers.** Researchers in ivory towers and think tanks frequently conduct research projects which end up as publications out of sight and reach of decision makers. "Researchers are often unprepared or unwilling to communicate their results to the public or to decision-makers; they expect that publication of results in scientific journals is sufficient to bring them into eventual use."[5] Moreover, research findings are written in academic language of the

field of research and published in academic journals which are not ordinarily accessed by decision and policy makers.[6]

The reverse, of the above, is the case with the presentation of ACAN research findings. Findings, conclusions and recommendations are presented in a language and style that is generally understandable and not academia-speak. In addition, aspects that particularly relate to specific stakeholders are highlighted for their attention.

**Significance of Some Recent Research Projects Conducted by the Academy**

ACAN research projects help policy and decision makers by helping them know what exactly the matter is; the exact problem with the matter; and the appropriate solution to the problem, instead of one size fits all. In addition, the research projects evaluate the effectiveness of existing interventions. They also provide evidence to inform the continuation, modification or cessation of existing courses of action. Four recent ACAN research projects can be applied to demonstrate the workings discussed above.

1. **Research on Electoral Fraud, with Focus on Vote Buying**

At the global level, Nigeria has an obligation under the United Nations Convention against Corruption (UNCAC) to prevent corruption in the public sector. In this regard, one of the actions prescribed by UNCAC is the enactment of legislation and adoption of administrative measures to prescribe criteria concerning candidature and election into public office.[7]

Similarly, at the regional level, the African Charter on Democracy, Elections and Governance (ACDEG) requires that the principles that should govern elections and governance include the "[c]condemnation and rejection of acts of corruption, related offenses and impunity."[8] The obligation to prevent corruption in the electoral process is also inherent in the African Union Convention on Preventing and Combating Corruption (AUCPCC),[9] which is incorporated by reference in the ACDEG.[10]

Again, at the sub-regional level, there is the obligation to prevent corruption in the electoral process. This obligation arises from the ECOWAS Protocol A/SP1/12/01 on Democracy and Good Governance (ECOWAS PDGC),[11] Supplementary to the Protocol

relating to the Mechanism for Conflict Prevention, Management, Resolution, Peacekeeping and Security.

Domestically, the National Anti-Corruption Strategy (NACS) 2017-2020 requires the prevention of corruption in the electoral process.[12] It also requires the proactive steps to prevent corruption in public and private institutions.[13] The Electoral Act 2020 also provides for domestic measures against electoral fraud.[14]

ACAN researchers reviewed literature and reports on electoral fraud and found that there were widespread reports of votes being exchanged for cash and other materials. While some stakeholders in the electoral process considered these exchanges to be voter mobilization, others considered it to be vote buying. The Electoral Act 2010 (as amended) does not expressly mention vote buying. However, the Code of Conduct for Political Parties prohibits "buying votes or offering any bribe, gift, reward, gratification or any other monetary or materials consideration of allurement to voters and electoral officials."[15]

In the context of combating corruption in the electoral process, ACAN researchers conducted a comparative and in-depth review of existing laws, decided cases and literature to determine the following issues:

- Definition of Vote Buying
- Procedures and Mechanisms for Reporting Vote Buying
- Best Approaches to Mobilising the Public Against Vote Buying
- Procedures and Mechanisms for Sanctioning Vote Buying

Following the in-house research and presentations at ACAN, stakeholders from the public and private sector were invited to a "Policy Dialogue on Eradication of Electoral Fraud: Focus on Vote Buying".[16] Stakeholders at the Policy Dialogue were from the Independent National Electoral Commission (INEC), Security and Law Enforcement Agencies (SLEA), Anti-Corruption Agencies (ACAs), political parties, Popular Mobilisation Agencies (PMAs), academia and Civil Society Organisations (CSOs). In all about 63 registered attendees participated in the Dialogue.

So, ACAN research findings were discussed alongside, the insights, experiences and opinions of all relevant stakeholders. Eventually, the findings and recommendations on the four research issues were

published in a simple to read Policy Brief.[17] The Policy Brief has been widely accepted by governmental and non-governmental stakeholders for guidance of their policies, decisions and actions.[18]

Among others, the Policy Brief provided evidence for policy and decision makers on the exact nature of vote buying. Contrary to the common view that vote-buying only entails the purchase of votes, it was demonstrated that vote buyer pays a person or a group of people in order for them to do one or any combination of the following:

- Vote;
- Refrain from voting;
- Cast a void vote;
- Cast a vote for the choice of the buyer;
- Register as a voter;
- Transfer registration; and
- Engage in false registration.

Evidence was also provided to support the following recommendations to policy and decision makers:

- Eventual establishment of an Electoral Offences Commission (EOC) which should focus on all electoral offenders and offences including vote buying;
- Vigorous implementation of exiting provisions of laws penalising vote buying and related conduct;
- Pending the establishment of EOC, investigation and prosecution should be targeted at persons most responsible for vote buying including the candidate, buyers, vote sale brokers, voter traffickers and their principal agents;
- While criminal prosecutions may not be practicable against small time offenders due to the huge numbers involved, written warnings should be issued to such persons and their names publicised. Such written warnings should include name of the investigated offender and the details of the incident;
- Candidates should be prosecuted individually or alongside vote buyers where the vote buying is done with the knowledge and consent of the candidate or the knowledge and consent of a person who is acting under the general or special authority of the candidate;

- Where a candidate is prosecuted for vote buying, the candidates political party should be charged as a co-defendant and the party should be fined where convicted;
- Prosecution of persons involved in the use of illicit funds (including funds from unexplainable sources) and illicitly disbursed funds to buy votes at intra-party level;
- The law needs to be modified to include party primaries in its scope so appropriate sanctions for vote buying can be applied at intra party level even where the funds used are not illicitly obtained or disbursed;

### 2. Research on Accountability for Secret Security Expenditure

Upon desk review of applicable laws, treaties, decided cases, literature and public commentaries, ACAN researchers found that the funds appropriated through the item identified as security vote in the National and sub-national budgetary process are subject to embezzlement, misappropriation or other forms of unlawful diversion. The funds are also traceable to instances of illicit enrichment. These constitute an abuse of public funds.

Nigeria has global, regional, sub-regional and domestic obligations to prevent and sanction the abuse of public funds. For example, the global level, the UNCAC, requires each state party to adopt legislative and other measures to combat the "embezzlement, misappropriation or other diversion of public or private funds or securities or any other thing of value entrusted to the public official by virtue of his or her position"[19] It also requires the criminalisation of "significant increase in the assets of a public official that he or she cannot reasonably explain in relation to his or her lawful income"[20]

It also came to light, from the desk review, that there are no clear legislative or policy guidelines for appropriating and accounting for the said security votes. With a view to contributing to the attainment of the NACS objective of having an "Improved Legal, Policy and Regulatory Environment"[21], ACAN researchers further conducted an in-depth comparative review of how other UNCAC state parties prevent the corrupt use of funds appropriated through secret budgets.

Subsequently, stakeholders were invited to a Policy Dialogue for the discussion of their experiences, views alongside the ACAN research findings and recommendations on the following issues:

- Definition of security votes, legitimate users and matters for which security votes may be lawfully applied
- Entrenching accountability in the use of security votes
- Categories of persons, whom may be, funded or paid from security votes
- Modalities and frequency of rendering account for security votes received or used

Participants at the Policy Dialogue were from civil society, academia, the military, security and intelligence agencies, anti-corruption agencies, law enforcement agencies, political parties, civil service, public service including elected officials and the media.[22] Opposing views were openly discussed by the participants.[23] The research findings and most of the recommendations were accepted by the stakeholders.[24] In the context of contributions of stakeholders at the Policy Dialogue, ACAN research findings and recommendations were published in a Policy Brief.

Among others the Policy Brief helps policy and decision makers to remove the ambiguity in the definition of security votes by clarifying that in the Nigerian budgetary process, moneys appropriated are described as votes and security votes are items of security expenditure whose details are kept secret and not specified in the budget document.[25] The Policy Brief also provided evidence of the arbitrariness in the security vote appropriation process. It presented evidence that in the 2019 Budget, a total of N21,848,004,970 (Twenty-One Billion, Eight Hundred and Forty-Eight Million, Four Thousand, Nine Hundred and Seventy Naira) was appropriated as security votes for 162 (One Hundred and Sixty-Two) Ministries, Departments and Agencies (MDAs). The distribution of this sum across MDAs is depicted in Table 1 below.[26]

**Table 1: Distribution of Security Votes Across MDAs[27]**

| Type of MDA | Number of Recipients | Amount in Naira |
|---|---|---|
| **Agriculture** | 7 | 11,088,769 |
| **Anti-Corruption Agency** | 3 | 115,681,056 |
| **Auditing** | 1 | 4,800,000 |
| **Awards** | 1 | 4,050,000 |
| **Budget & Planning** | 1 | 15,270,419 |
| **Civil Service Administration** | 2 | 11,084,824 |
| **Education** | 47 | 123,411,078 |
| **Environment** | 11 | 17,347,834 |
| **Health** | 15 | 39,898,790 |
| **Identity Management** | 1 | 9,469,965 |
| **Industry and Trade** | 2 | 19,784,000 |
| **Information** | 6 | 31,083,093 |
| **Infrastructure** | 1 | 7,150,000 |
| **Intelligence** | 5 | 5,817,547,148 |
| **Labour and Employment** | 1 | 1,280,000 |
| **Law Enforcement/Public Safety** | 8 | 730,577,348 |
| **Legal** | 2 | 6,380,824 |
| **Lottery** | 1 | 2,280,000 |
| **Military** | 7 | 9,817,886,150 |
| **Military Education/Research** | 2 | 4,695,727,669 |
| **Mines & Steel** | 2 | 8,992,268 |
| **Petroleum** | 1 | 9,000,000 |
| **Power, Works & Housing** | 2 | 6,479,648 |
| **Presidency** | 2 | 260,120,000 |
| **Science and Technology** | 23 | 16,950,688 |
| **Transport** | 5 | 50,967,395 |
| **Water Resources** | 1 | 200,000 |
| **Women Affairs** | 2 | 13,496,004 |
| **Grand Total** | **162** | **21,848,004,970** |

The Policy Brief, recommended ways of meeting the various international and domestic obligations relating to preventing the embezzlement and other abuses of security votes. For example, based on the evidence of what should be legitimate use of security votes, it was recommended to policy and decision makers that MDAs that do

not have a continuous core security function (CCSF) are not fit and proper recipients of security votes.[28]

It was demonstrated that an MDA has CCSF if its primary mandate demands the prevention or suppression of domestic or foreign threats of harm against the people of Nigeria, public and private institutions of the country, or the State as an entity. MDAs with CCSF conventionally have the statutory or constitutional mandate to:[29]

- gather and process local and foreign intelligence.
- work with law enforcement, military and intelligence allies of the country.
- counter criminal, terrorist, military and intelligence adversaries of the country.
- engage in war or armed conflict on behalf of the country.
- investigate crimes against individuals, institutions and the State (country).
- arrest and prosecute offenders.
- protect witnesses and whistle-blowers.
- deter organised crime.

### 3. Corruption Awareness Attitude & Susceptibility (CAAS) Survey of Students of Tertiary Institutions 2019

In fulfilment of anti-corruption obligations, Nigeria is required to work towards the inclusion of anti-corruption in the curricula of tertiary institutions. One of such obligations is contained in the UNCAC which provides that state parties should promote "activities that contribute to nontolerance of corruption, as well as public education programmes, including school and university curricula."[30] Domestically, the Implementation Plan of the National Anti-corruption Strategy (IP NACS),[31] requires the introduction of General Studies in Anti-corruption to improve anti-corruption awareness among students of tertiary institutions in the country.[32]

Tertiary institutions are the training grounds for Nigerians who will hold virtually all senior positions in the public and civil service. Presuming that the knowledge and orientation received in the tertiary institutions would be brought to bear in the performance of their roles as future leaders,[33] IP NACS adopts the strategic goal of improving public awareness of corruption and its implications through General Studies in anti-corruption in tertiary institutions.[34]

To provide evidence to appropriately plan and support the implementation of general studies in anti-corruption in tertiary institutions, ACAN conducted the Corruption Awareness Attitude and Susceptibility Survey (CAAS). The findings were discussed at ACAN presentations. They were also shared with stakeholders in the academia for peer review and comments. The findings and recommendations were published in a widely disseminated report.[35] The report has guided the decisions and policies of stakeholders in the tertiary education sector.[36]

The survey tool was a self-administered questionnaire. The respondents to the questionnaire were 1,926 (one thousand nine hundred and twenty-six) randomly selected undergraduate students in 39 tertiary institutions across the 6 geo-political zones of Nigeria.[37]

The CAAS Survey provided evidence to policy and decision makers that the surveyed students had a Low Level of anticorruption awareness, they were Dangerously Exposed to corruption and were Very Susceptible to corruption.[38] Among others, the CAAS survey found that 51% of students in tertiary institutions are not aware of the distinction between bribery and extortion. 65% were not aware of the existence of UNCAC (see Figure 1). 67% were not aware of other ACAs apart from ICPC and EFCC (see Figure 2). 44% had the personal experience of engaging in a corrupt practice (see Figure 3).

**Figure 1: Existence of UNCAC**

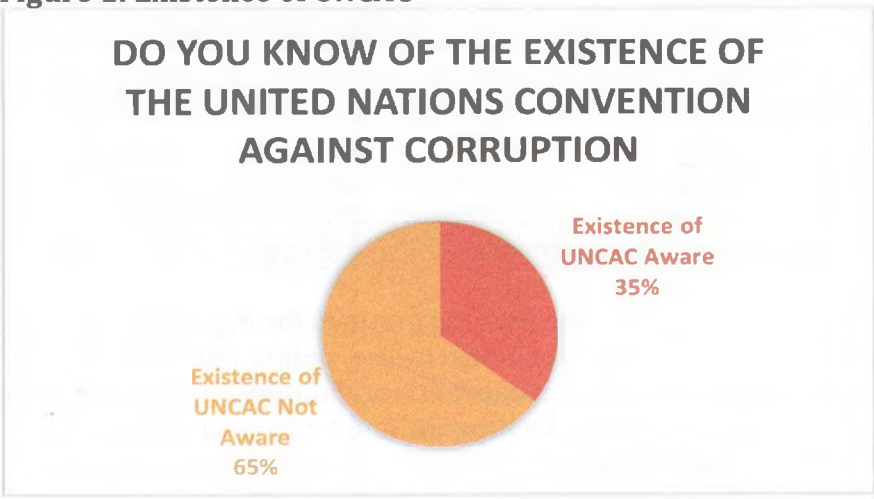


**Figure 2: Awareness of other ACAs apart from ICPC and EFCC**

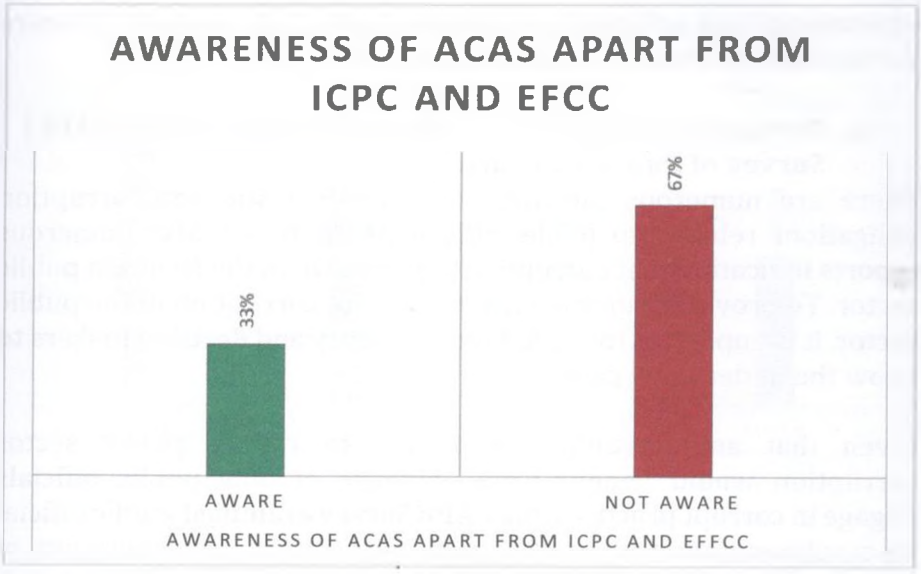



**Figure 3: Experience of Corrupt Practice**




The CAAS Survey thus provided evidence that can be used in designing and monitoring educational anti-corruption interventions in tertiary institutions.[39] The CAAS Survey showed areas where students have substantial awareness of issues as well as areas where

they are largely unaware of the issues. The survey also revealed the students' attitude, exposure and susceptibility to corruption. If the educational and orientational interventions are successful, future surveys should show substantial improvements.[40]

### 4. Corruption Attitude, Perception and Experience (CAPE) Survey of Public Officials

There are numerous international and domestic anti-corruption obligations relating to public officials.[41] There are also numerous reports indicating that corruption is pervasive in the Nigerian public sector. To provide properly stem the tide of corruption in the public sector, it is important for stakeholders, policy and decision makers to know the underlining causes.

Given that anti-corruption initiatives to reduce public sector corruption would benefit from evidence of why public officials engage in corrupt practices, the CAPE Survey examined public official as a subpopulation whose attitude, perception and experience of corruption might be different from the rest of the citizenry.[42] Targeting the subpopulation allowed for asking questions that will aid specific anti-corruption activities, policies and decisions for the public sector.[43]

The survey tool was a self-administered questionnaire filled by 1,510 (one thousand five hundred and ten) randomly selected public officials in Federal MDAs. The survey provided evidence that younger public servants are likely to engage in corruption on the false justification that everyone else is doing it (see Figure 4).[44] The survey also provided evidence that the anxiety of meeting basic needs is an enormous form of psychological pressure on public servants as 76% considered that their salaries including all allowances were not sufficient to meet their basic monthly needs (see Figure 5). More female than male (77.16% of the female and 75.70) public officials indicated that their salaries and allowances were insufficient for their basic monthly needs (see Figure 6). It was also shown that community acceptance played a large role in promoting corruption in the public sector as 69% of public servants indicated that their community would accept monetary gifts above their annual salary without questioning the source of the money (see Figure 7). Other causes and enablers of public sector corruption are contained in the CAPE Survey Report 2020.

**Figure 4: Age in Relation to the View that Everyone in Nigeria is Corrupt**

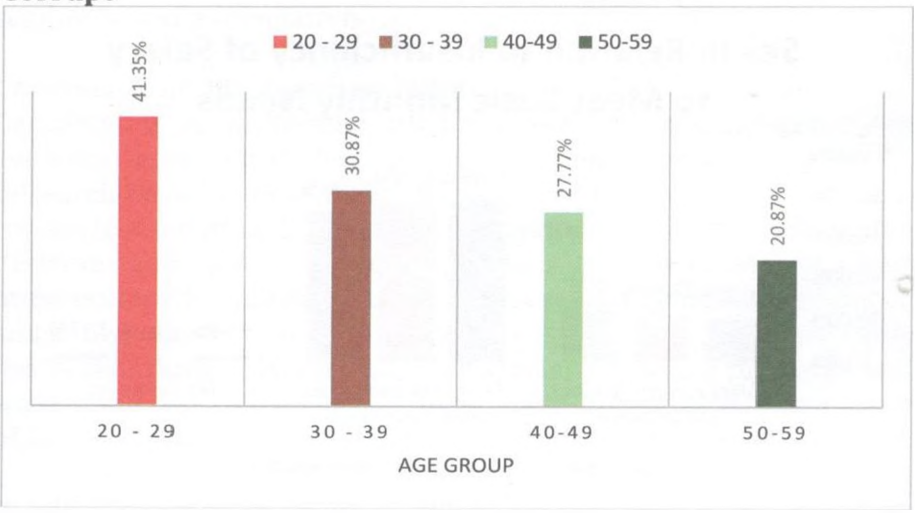



**Figure 5: Meeting Basic Needs Through Salaries and Allowances**

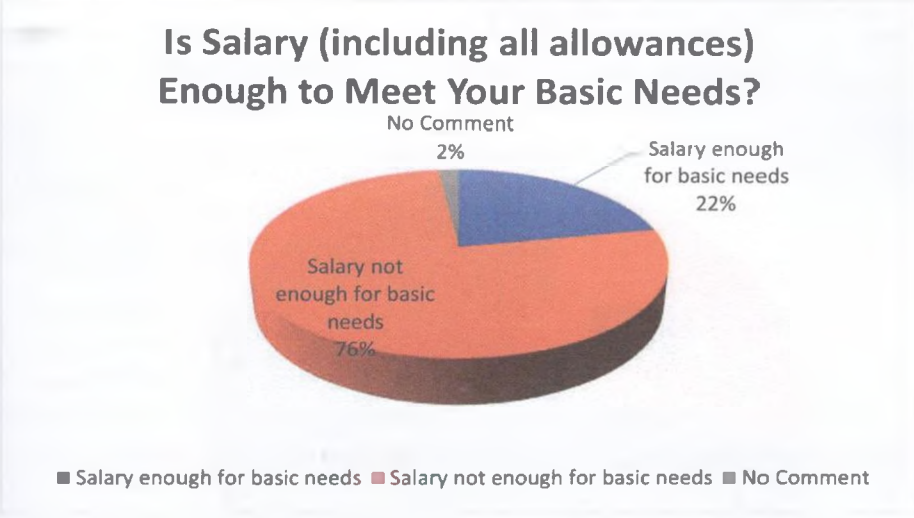


**Figure 6: Sex in Relation to Insufficiency of Emoluments to Meet Basic Needs**

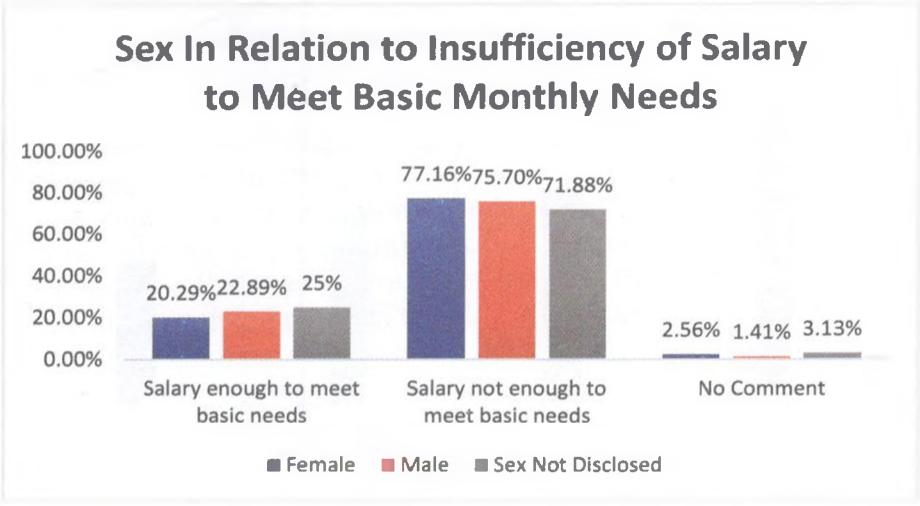



**Figure 7: Community Acceptance of Monetary Gifts Larger than Public Official's Annual Salary**




In all, the CAPE Survey seeks to guide policy and decision makers by providing evidence of underlying factors that push, pull, enable or

support corruption in the public service. Based on the evidence supplied, interventions can be targeted at the appropriate issues and segments of the population.

**Conclusion and Recommendations**

Certainly, it is preferable to act based on research-generated evidence and knowledge than to act on anecdotal opinion.[45] Research-based interventions are however best utilised where the research is continual. Continual or periodic research will enable decision and policy makers measure the successes of their interventions.[46] Although providing research-generated evidence and knowledge for anti-corruption work is good in itself, its real value lies in continuity. Moreover, it is important to widen the scope and scale of the research being conducted by ACAN. At the moment, most of the research projects are focused on the federal tier of the country.

In addition, research facilities and techniques need to be improved. The CAAS and CAPE Surveys were conducted using self-administered paper questionnaires. In preparation for future surveys, ACAN has acquired 40 handled computers for Computer Assisted Personal Interviewing (CAPI).[47]

Provided that the management of ACAN and ICPC continue to abide by the Strategic Plan of ACAN and ICPC respectively, ACAN will continue to conduct research projects to aid evidence-based and knowledge-driven interventions.

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**Endnotes**

[1] Angela Gorta, "Research: A Tool for Building Corruption Resistance," in *Corruption and Anti-Corruption*, ed. Peter Larmour and Nick Wolanin (ANU Press, 2013), 11–29, http://www.jstor.org/stable/j.ctt2tt19f.5.

[2] See for example the discussion on 'Norm Diagnosis' in: Alina Mungiu-Pippidi, *Seven Steps to Evidence-Based Anticorruption: A Roadmap* (Stockholm: Elanders Sverige AB, 2017).

[3] Remarks of Professor Sola Akinrinade, Provost, Anti-Corruption Academy of Nigeria, at ACAN Strategic Plan Development Meeting of November 2018. See also ACAN Strategic Plan 2019 to 2023.

[4] Julieta Lugo-Gil, Dana Jean-Baptiste, and Livia Frasso Jaramillo, *Use of Evidence to Drive Decision-Making in Government* (Washington, D.C.: Mathematica Policy Research, 2020). p8.

[5] James Trostle, Mario Bronfman, and Ana Langer, "How Do Researchers Influence Decision-Makers? Case Studies of Mexican Policies," *Health Policy and Planning* 14, no. 2 (1999): 103–14.
[6] Julieta Lugo-Gil, Dana Jean-Baptiste, and Livia Frasso Jaramillo, *Use of Evidence to Drive Decision-Making in Government*. p8.
[7] Article 7(2) United Nations Convention Against Corruption (UNCAC).
[8] Article 3(9) African Charter on Democracy, Elections and Governance (ACDEG).
[9] Article 10 and Article 2(1) African Union Convention on Preventing and Combating Corruption (AUCPCC).
[10] Article 2(9) ACDEG.
[11] Article 38 ECOWAS Protocol A/SP1/12/01 on Democracy and Good Governance (ECOWAS PDGC).
[12] See sub-objective 2.2. National Anti-Corruption Strategy (NACS) 2017-2020, which requires the strengthening of the electoral process across the federal, state and local government levels to engender public confidence.
[13] Sub-objective 4.1 NACS.
[14] See for example, section 130 Electoral Act 2010.
[15] INEC, Code of Conduct for Political Parties, 2013.
[16] Nigeria Civil Society Situation Room, "ICPC Proposes Framework to Tackle Vote Buying," April 24, 2019, situationroom@placng.org. Accessed on 09 April 2020.
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[19] Article 17, UNCAC.
[20] Article 20, UNCAC.
[21] Objective 1, NACS, 2017-2020.
[22] Vanguard Newspaper, "ICPC Calls for Parameters for Security Votes Appropriation, Accounting," September 11, 2019, https://www.vanguardngr.com/2019/09/icpc-calls-for-parameters-for-security-votes-appropriation-accounting/. Accessed on 20 April 2020.
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[24] Corruption Reporter, "ICPC Calls for Parameters for Security Votes Appropriation, Accounting," September 11, 2019, https://www.corruptionreporter.com/icpc-calls-for-parameters-for-security-votes-appropriation-accounting/. Accessed on 20 April 2020.

[25] See for example different security matters with details included in the 2019 Budget as against items listed as security vote which do not have details specified in the Budget. See the Appropriation Act 2019. Available at https://budgetoffice.gov.ng/index.php/2019-budget accessed on 20 April 2020.

[26] ACAN, "Prevention of Corruption in Security Budgeting – Engendering Accountability for Security Votes without Jeopardising National Security," 2020.

[27] ACAN, *Ibid.*

[28] ACAN, *Ibid.*

[29] ACAN, *Ibid.*

[30] Article 13(1)(c) UNCAC.

[31] See Key Activity 2.2.4.1.3 of the Implementation Plan of the National Anti-corruption Strategy (IP NACS).

[32] ACAN, "Corruption Awareness, Attitude & Susceptibility (CAAS) Survey of Students of Tertiary Institutions," 2019. p1.

[33] See paragraph 2.2.1.1 of the IP NACS.

[34] ACAN, "Corruption Awareness, Attitude & Susceptibility (CAAS) Survey of Students of Tertiary Institutions."

[35] Guardian Newspaper, "Nigerian Students Dangerously Exposed to Corruption – ICPC Survey," August 27, 2019, https://guardian.ng/news/nigerian-students-dangerously-exposed-to-corruption-icpc-survey/.

[36] PM News, "ICPC Survey: Nigerian Students Dangerously Exposed to Corruption," August 27, 2019, https://www.pmnewsnigeria.com/2019/08/27/icpc-survey-nigerian-students-dangerously-exposed-to-corruption/.

[37] ACAN, "Corruption Awareness, Attitude & Susceptibility (CAAS) Survey of Students of Tertiary Institutions." p3.

[38] ACAN. p.7.

[39] ACAN. p. 19.

[40] ACAN. p 19.

[41] See for example, Article 7 UNCAC; Articles 5 and 6 ECOWAS Protocol on the Fight Against Corruption; Article 7 AUCPCC etc.

[42] ACAN, "Corruption Attitude, Perception and Experience (CAPE) Survey of Public Officials Report," 2020.
[43] Marlen Heide and Andy McDevitt, Transparency International: Corruption Assessment Toolbox: https://www.transparency.org/en/whatwedo/tools/gateway-corruption-assessment-toolbox/0# accessed on 10 April 2020.
[44] ACAN, "Corruption Attitude, Perception and Experience (CAPE) Survey of Public Officials Report."
[45] S Cavil and M Sohail, *A Note on Research Methodology for Combating Corruption* (Loughborough University, n.d.). P. 2.
[46] "Surveys have an advantage over other means of gathering evidence on corruption in that they are relatively straightforward to repeat and they permit some degree of comparison over time and between institutions, sectors and locations". See Matthew Jenkins, The role of evidence, data and research findings in promoting integrity in education. Available at https://knowledgehub.transparency.org/assets/uploads/kproducts/The-role-of-evidence-and-data-to-promote-integrity-in-the-education-sector.pdf. Accessed on 12 July 2020.
[47] Data collection on the CAPI Devises will be through the CSPro platform.