THE CHALLENGE OF COMMUNICATING ICPC’S ETHICS AND COMPLIANCE SCORE CARD FOR MINISTRIES, DEPARTMENTS AND AGENCIES (MDAS) OF THE FEDERAL GOVERNMENT OF NIGERIA

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ABSTRACT
This article discusses the challenge of communicating the Independent Corrupt Practices and other Related Offences Commission’s (ICPC) Ethics and Compliance Score Card for Ministries, Departments and Agencies (MDAs) of the Federal Government. The Score Card contains a structured summary of values that measure a set of indicators. It scores, tabulates and ranks indicator items and their attributes along a range of values. The Score Card creates a platform for comparing and analyzing the weaknesses that make MDAs susceptible to corruption. It will also measure MDA’s compliance with institutional integrity mandates, as well as accountability principles required for effective service delivery. The argument that communication is essential for the realization of the objectives of the Score Card was advanced in a discourse analysis. Anchored on theories X and Y and Media Richness theory, the paper focuses on the Score Card, its implications and the risk of not factoring professional communication, advocacy and effective stakeholders’ engagement in the implementation; highlighting the paths not yet taken. It is recommended that Civil Society practitioners, relevant professional bodies and stakeholders in the communication sector must be involved and a robust communication strategy developed to ensure the realization of the objectives of the Score Card.

Key words: Corruption, Ethics and Compliance Score Card, Independent Corrupt Practices and Other Related Offences Commission, Communication, Ministries, Departments and Agencies.

Introduction
The Independent Corrupt Practices and Other Related Offences Commission (ICPC) is a Nigerian anti-graft agency that was inaugurated on the 29th of September 2000, following the recommendation of former President Olusegun Obasanjo. The ICPC Act brings under its purview all Nigerians, in the private and public sectors and even those public officers with constitutional immunity. The Commission receives and investigates complaints from members of the public on allegations of corrupt practices and in appropriate cases, prosecutes the offenders.

The ICPC, by its establishment Act has the mandate to review on a periodic basis, the systems, procedures and operations of public and private sector institutions, in order to determine institutional vulnerabilities that can or actually engender corruption in the organisations. The ICPC carries out this work through the Systems Study and Review programme.

Although, results of the studies are shared by ICPC with the institutions reviewed, there is no mechanism for the Commission to translate in comparative perspective, the findings of the systems studies and to inform the Nigerian public about the nature of corruption or institutional vulnerabilities in private and public sector institutions. To close this obvious gap, the Commission, with support from the Justice for All programme of the British Government’s Department for International Development (DFID), developed an Ethics and Compliance Score Card. The Score Card outlines some ethics and integrity standards that
Ministries, Departments and Agencies (MDAs) of government must comply with in management, performance, service and professional conduct settings. The MDAs and their sector units are to be scored on a regular basis to determine the level, scope, extent, and timeliness of compliance with these integrity requirements.

The Score Card contains a structured summary of values that measure a set of indicators. It scores, tabulates and ranks indicator items and their attributes along a range of values. Generally, in social science research, a score card is used to evaluate the state of an undertaking and to inform further action or policy. Similarly, the Ethics and Compliance Score Card creates a platform for comparing and analyzing the weaknesses that make MDAs susceptible to corruption. The card will also measure MDAs compliance with institutional integrity mandates as well as accountability principles required for effective service delivery.

The assessments resulting from the application of the Score Card will be weighed into specific scores and published for the attention of the MDAs and for consideration by the general public. The ultimate goal is to have MDAs understand the quality of their performance and take account of their level of compliance with operational, service delivery and accountability standards, as required by the mandates of the institutions. More so, the assessments and scores will create a greater sense of urgency for the MDAs to strengthen their accountability systems and to operate with greater efficiency and service excellence.

Where non-compliance is detected, MDAs shall develop measures to address the situation. Where non-compliance is determined by result from other institutional or technical vulnerabilities or lack of capacities, MDAs shall ensure that integrity standards are in place and are functioning successfully.

Each MDA is expected to comply with the integrity standards. All employees of all grade levels in MDAs are to be provided copies of the integrity standards and compliance requirements. The standards shall also be incorporated into the recruitment and promotion procedures, as well as performance appraisals.

An Anti-corruption and Transparency Unit Officer, who will function as an ethics and integrity officer is expected to monitor, assess and report compliance/noncompliance to ICPC on a periodic basis. These reports are to be sent to ICPC for analysis and for further follow-up corrective action.

THE PROBLEM, SIGNIFICANCE AND RESEARCH OBJECTIVES

Although the Ethics and Compliance Score Card has recently been deployed to Ministries, Departments and Agencies of the Federal Government of Nigeria, there is no elaborate communication and advocacy strategy to mobilize stakeholders and the citizens at large to drive its implementation. This study is therefore timely and relevant in providing an alternative strategy for an effective solution to the full implementation of Ethics and Compliance Score Card. Also, it will be a start-off point for future researches on this topic and other issues around public service reforms.

On a regular basis, each MDA is expected to conduct training sessions for ethics and compliance for employees and certify for each employee at the end of the training session, that they have imbibed the integrity principles and are very conversant with the compliance requirements. No doubt, the surest way of ensuring that the Ethics and Compliance Score Card fails is not factoring a strategic advocacy and communication strategy into its implementation. As presently deployed, there is no Civil Society representation and involvement in the implementation, to monitor closely and raise a red flag when there are compliance issues. The ICPC is reluctant to embarrass public institutions that default, but prefers an internal mechanism to address them. This is the age-long practice in public service in Nigeria that has never worked. We cannot be doing the same thing all the time and expect different results.

In deploying the Ethics and Compliance Score Card, civil society and communication stakeholders must be participatory. Gaps in approach are obvious. Duru, 2017 argued that the failure of communication will result in failure in implementation of laudable initiatives; thereby making the Ethics and Compliance Score Card one of the several Government initiatives that fell through the cracks.
This article discusses the Ethics and Compliance Score Card of the Independent Corrupt Practices and Other Related Offences Commission- ICPC, its implications, implementation and the risk of not factoring professional communication and effective advocacy in the implementation process; highlighting the paths not yet taken.

THEORIES X AND Y

Theories X and Y, propounded by Douglas MsGregor (Anaeto, Onabanjo & Osifeso, 2008, pp. 156-160) assume that the average person has an inherent dislike for work and will avoid it whenever possible; and that work is as natural as play and rest, form the theoretical anchors of this paper. The X Theory assumes that an average human being must be coerced, controlled, directed or threatened with punishment in order to get him to achieve the organizational goals; while Y holds that commitment to objectives is a function of the reward associated with their achievements. People will be committed to their objectives if rewards are in places that address higher needs such as self-fulfillment. The Ethics and Compliance Score Card is a Public Service reform initiative that must be lauded. Therefore, adopting a carrot and stick approach for the Ethics and Compliance Score Card implementation will help to ensure compliance with the initiative and enhance productivity in public service.

MEDIA RICHNESS THEORY

Media Richness theory (MRT) proposed by Daft & Lang (Morah & Uzochukwu, 2012, p.123) emphasizes the usefulness of the communication medium. MRT assumes that the communication efficiency between people is affected by the fitness of the media and the characteristics of the communication tasks. The richness of the media is therefore, based on the following four criteria: capacity for immediate feedback; capacity of the medium to have a personal focus; capacity to transmit multiple cues, and; language variety (Daft, Lengel & Trevino, 1987). This theory strongly believes that the purpose of communication is to reduce uncertainty and equivocality in order to promote communication efficiency, where uncertainty is associated with the lack of information and equivocality is associated with negotiating meanings for ambiguous situations. Therefore, adopting a rich medium for the Ethics and Compliance Score Card implementation will help to transmit sufficient amount of correct information about the initiative that will reduce uncertainty and process rich information.

METHODOLOGY OF SCORING THE MDA ETHICS AND COMPLIANCE SCORE CARD

The Ethics and Compliance Score Card evaluates MDAs based on key indicators on ethics and compliance under three broad headings, each of which has multiple sub-headings and sub-indicators. The main headings are:
► Management Culture and Structure
► Financial Management Systems
► Administrative systems

The scores assigned to the various indicators contained in the Ethics and Compliance Score Card carry a total of one hundred (100) points, represented as percentages. Each sub-indicator also carries one hundred points. These are then divided by the total of all the sub-indicators and divided by 100 to get the actual score (expressed as a percentage). The real scores for the sub-indicators are assigned in different weights, in terms of the extent of variance of a sub indicator from the main indicator. The variance refers to how closely or farther away the sub-indicator is from the core requirements of the main indicator. That is, values are assigned from a numerical range of low to high (e.g. 1-6). Low numbers (1) of a sub-indicator represents a variance farther away from the primary indicator in terms of importance, essence, compliance requirements and operational viability in achieving the aims of the indicator. For example, a higher numerical value (6) of a sub-indicator means it is very close to the primary indicator in terms of the importance, essence, compliance requirements and operational viability in achieving the aims of the indicator. In sum, a major consideration for the different weights is the extent to which the sub-indicator
conveys the core elements of the primary indicator; meets the compliance requirements of the indicator and can actually realize the objectives of the indicator.

The weighs were determined from an agreement among the programmers regarding the meaning, essence, and level of compliance required by the indicators of the score card. Further, an indicator audit was done to determine conceptual accuracy. The reasons for assigning the weights is to guide implementers of the score card in how to understand the values assigned to the different indicators and sub-indicators and to help interpret and determine the extent to which MDAs are implementing or complying with the requirements of ethics and compliance programmes.

Ultimately, the essence is to ascertain the extent to which anti-corruption measures are effective in the MDAs and whether accountability systems are functional in preventing corrupt practices and creating high ethical cultures, professional integrity, organizational integrity and better service delivery.

COMMUNICATION AND THE ETHICS AND COMPLIANCE SCORE CARD

It is clear that communication will play a major role in realizing the objectives of the Ethics and Compliance Score Card. Both the conventional and unconventional media of communication need to be deployed, pursuant to the set objectives. The mass media will make it possible for the messages of the Score Card to reach far-flung heterogeneous audiences simultaneously. They make mass communication possible. They are veritable tools for social change and the organ of the society whose responsibility is to gather and disseminate information about the society (Duru, 2016).

Dominic (1990) sees the mass media as thus:

when we talk of the mass media of Television, Radio, Newspapers, Magazines, sound recording, and film, we will be referring to the people, the policies, the organizations, and the technology that go into producing mass communication. According to him, a media vehicle is a single component of the mass media such as Newspaper, Radio station, Deletion network, magazine etc.

Basically, the roles of the mass media include to: inform, educate and entertain. They elevate individual and group issues to the level of public discussion (Anibueze, 2009).

According to McQuail (2012), mass media, especially press and television (1) have to fully update people with world and local news and comments on them; (2) information has to be objective in terms of truthfulness, sincerity, reality, trustful, and differentiating facts and opinions, and (3) information has to be balanced and it has to show alternative points of view in non-sensational way. For the Score Card implementation to enjoy robust citizens’ participation, the mass media should therefore, provide information that enables the society to “share common knowledge of what is happening” (Schramm, 1971, p. 20). The mass media should also educate the masses on the details and implications of the issues around the Score Card, while educating them on their roles for its effective implementation and overall success.

The mass media have a duty to mobilize citizens of every society for participation in governance and reforms. The Ethics and Compliance Score Card is a good-governance initiative that every Nigerian citizen, not just civil servants must embrace and assist to work effectively; but may fail, if there is no professional communication strategy and effective media buy-in.

Media practitioners themselves agree on a critical function of the mass media in promoting good governance, challenging and supervising the society elites and defending the citizens (Duru, 2017). It is expected that the mass media should form an arena for public discourse on the Ethics and Compliance Score Card, with a view to ensuring citizens engagement and participation. It is therefore the responsibility of the mass media to campaign vigorously for the effective administration and enforcement of the Ethics and Compliance Score Card in Nigeria.

PROPOSED COMMUNICATION AND ADVOCACY STRATEGY

In view of the indispensable role of communication and advocacy in governance, the need for a deliberate action on how to communicate the Ethics and Compliance Score Card cannot be over
emphasized. The researcher therefore proposes that the below-mentioned paths not yet adopted be considered for effective implementation of the Ethics and Compliance Score Card.

Involvement of Civil Society and Professional Organisations
The role of civil society and relevant professional organisations such as the Nigeria Union of Journalists NUJ, Nigerian Institute of Public Relations- NIPR, African Council for Communication Education- ACCE and Institute of Mass Communication and Information Management of Nigeria- IMIN cannot be over emphasized. Most communication professionals in Nigeria are registered with one professional body or another. Such bodies could be mobilized to join the advocacy on Ethics and Compliance Score Card implementation.

Mandatory Capacity Development Programmes
Although the Ethics and Compliance Score Card recommends regular capacity development programmes, there is no provision for frequency, modalities, content and other necessary elements. This leaves a major gap in the process, as knowing the traditional attitude of civil servants; it may be dead on arrival. Seminars and workshops on the role of effective communication in the Ethics and Compliance Score Card implementation, aimed at attracting attention of the citizens should be regular. Communication professionals should be involved in the crusade for good governance in Nigeria.

Regular Enlightenment Programmes
There is need for regular public enlightenment campaigns to raise and sustain the consciousness of the citizenry towards knowing their duties towards promoting good governance. There is therefore need for regular good governance education programmes, including the use of extension services. Part of the objectives will be to draw citizens’ attention to monitor the implementation of the Score Card, commend organisations with high compliant level and reprimand those with low compliance level. Naming and shaming has proven to be a good technique in ensuring compliance.

Use of New Media
The new media developed so fast in past decades that Nigerians now have greater access to information and a greater ability to communicate (Morah, 2012). Communication practitioners are encouraged to take advantage of new media platforms to promote the course of the Score Card. In addition, a page should be created on the website of ICPC on the Score Card. Social media platform accounts should also be opened for same, to enable access and participation among Nigeria. The Score Card should be uploaded on the website of every public institution in Nigeria for easy access.

Regular Stakeholders’ Roundtable
There is need for regular Roundtable sessions and Workshops for stakeholders for discourse and to deepen knowledge and capacity on the implications and compliance issues around the Card.

CONCLUSION: A WAY FORWARD
This article has discussed ICPC’s Ethics and Compliance Score Card, objectives, method of scoring, implications and the role of communication in ensuring effective implementation of the initiative. It has raised a number of issues which can enhance a research for greater efficiency in the mobilization of the citizens for active participation in the Score Card implementation process. The mass media have played a part in ensuring good governance in Nigeria, through its traditional roles. However, a lot remains undone. The gaps are enormous, while the Score Card deployment and use remains threatened by poor communication and stakeholders’ engagement; with adverse implications. The absence of critical communication stakeholders, as well as capacity gap has already done a great blow to the process. The absence of advocacy and communication strategy in the Score Card implementation is a recipe for failure.
The researcher however proposes an alternative plan for implementing the Score Card, which will include that communication stakeholders become participatory. Gaps are obvious. This is because failure of communication may result to failure in implementation.

REFERENCES


