Compliance Function & Leadership in Compliance

The Convention on Business Integrity,
in partnership with the Maritime Anti-Corruption Network

House Safety Moment

Expert-led Session

3 mins

Introductory Activity

Working in small groups, introduce yourselves to each other, discussing (15 minutes):

- ❑ Names, Organizations and Roles
- ❑ A common misconception that people often have about you
- ❑ Key Leadership challenges you will like to be addressed in the training

Each group will be given two minutes to share three leadership challenges that were highlighted.

15 mins

Setting the Scene

Brief Overview of Two-Day Training & House Rules

3 mins

Introduction

The purpose of this Handbook is to prepare Compliance and Operations Officers to confront and address issues of ethics, integrity, compliance, and corruption in everyday functions at Nigeria's ports and terminals. It provides hands-on expertise on critical elements of a compliance framework, creation of an adult teaching programme, leadership, case management and reporting, and data/trends analysis.

Background

Collective Action among stakeholders in Nigeria's maritime sector has resulted in corruption reduction and improvements in efficiency for vessel clearance processes. However, the sheer scale and geographical spread of ports and terminal operations in Nigeria makes it clear there is a need for each port agency to carry out its own compliance auditing and monitoring and prepare officers to a level where their professional conduct can be transparently, consistently, and predictably declared compliant with the Nigerian Port Process Manual (NPPM) and their agency's Standard Operating Procedures (SOPs).

About This Training

This Training Handbook for compliance and operations officers sets out the essential steps that each port agency should follow to strengthen controls for rapid detection, ensure adequate case management of reported compliance breaches, and audit and monitor compliance systems.

The Handbook is comprised based on the components of the 2008 LRN Ethics & Compliance Risk Management Practices Report. The modules are – Define, Prevent, Detect, Respond and Evaluate.
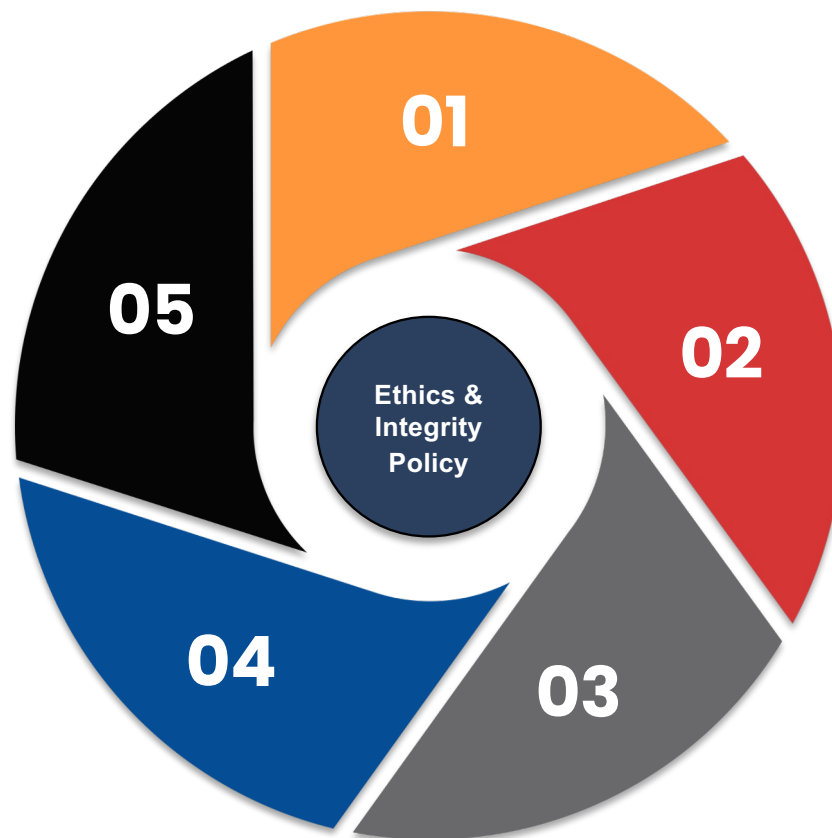
Two Central Frameworks

1. Compliance Mangement & The Journey So Far
2. The Compliance Solution Landscape

Compliance Management & The Journey So Far...

01 DEFINE

- Assess Risks
- Align Policies & Procedures to Risks
- Define Risk Profile
- Map Risks to roles & functions

02 PREVENT

- "Tone at the Top" (Political Will)
- Training & Education on Policy
- Facilitated Workshops
- Communication

03 DETECT & MONITOR

- Controls for Rapid Detection
- Stakeholder Compliance Certification
- Self-Reporting Channels
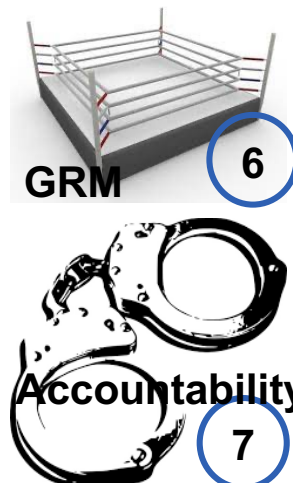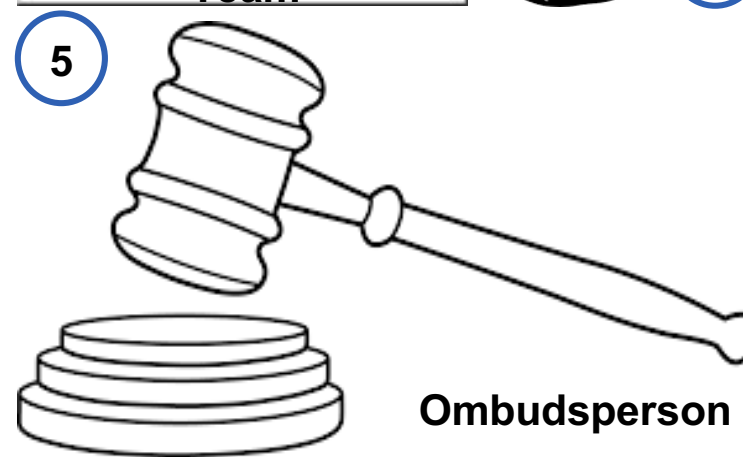- Compliance auditing & Monitoring

04 RESPOND

- Case identification, investigation & closure
- Redress - Corrective Actions including sanctions (CMF)
- Root Cause Analysis
- Communication of Resolution

05 EVALUATE

- Metrics & Benchmarks
- Policies, Practices & Procedures
- Reports & Actions
- System Improvements

01
02
03
04
05

Ethics & Integrity Policy

http://www.compliancebuilding.com/2009/02/25/the-2008-lrn-ethics-and-compliance-risk-management-practices-report/

The Compliance Solution Landscape

Vessel Captains and Agents ①

Ports Officials ②

Standard Operating Procedures (SOPs) ③

Local Help Desk Team ④

Ombudsperson ⑤

GRM ⑥

Accountability ⑦

Course Learning Objectives

Objective 1

Understand the components of compliance management, the current solution landscape, and compliance officers' role within it.

Objective 2

Receive, investigate, close, and report cases of non-compliance submitted through self-reporting channels.

Objective 3

Analyze metrics and data gathered and use feedback to identify trends, draw conclusions, set benchmarks for compliance and performance, and facilitate overall system improvement.

Expected Outcomes

1

Strong Compliance
Tone-At-The-Top

2

Rapid Detection of
Non-Compliance

3

Improved Port
Integrity Ratings

Agenda – Day 1

09:00 – 09:10	**WELCOME & INTRODUCTIONS**
09:10 – 09:20	**SETTING THE SCENE & OVERVIEW OF TWO-DAY TRAINING SESSIONS (HOUSE RULES)**
09:20 – 09:30	**WELCOME ADDRESS**
09:30 – 10:10	**LEADERSHIP MOMENT (01)**
10:10 – 10:40	**PREVENTING NON-COMPLIANCE**
10:40 – 11:10	**TEA/COFFEE BREAK & GROUP PHOTOGRAPH**
11:10 – 13:30	**PREVENTING NON-COMPLIANCE**
13:30 – 14:30	**LUNCH**
14:30 – 15:00	**PREVENTING NON-COMPLIANCE**
15:00 – 16:30	**LEADERSHIP MOMENT (02)**
16:30 – 17:00	**DETECTING NON-COMPLIANCE**
17:00 – 17:30	**WRAP-UP & CLOSE OF DAY ONE**

Agenda – Day 2

09:00 – 09:30	**RECAP OF DAY ONE**
09:30 – 10:00	**LEADERSHIP MOMENT (03)**
10:00 – 11:00	**RESPONDING TO NON-COMPLIANCE**
11:00 – 11:30	**TEA/COFFEE BREAK & GROUP PHOTOGRAPH**
11:30 – 12:00	**RESPONDING TO NON-COMPLIANCE**
12:00 – 12:30	**LEADERSHIP MOMENT (04)**
12:30 – 13:30	**EVALUATING NON-COMPLIANCE PATTERNS**
13:30 – 14:30	**LUNCH BREAK**
14:30 – 15:00	**LEADERSHIP MOMENT (05)**
15:00 – 16:30	**DEFINING RISK OF NON-COMPLIANCE**
16:30 – 17:30	**WRAP-UP & CLOSING OF TRAINING/PRESENTATION OF CERTIFICATES**

House Rules

1. Everyone participate
2. One person speaks at a time
3. Be open to new and radical ideas (D-VUCARD world)
4. Disagreement is welcome, but be polite
5. Respect other views
6. Be additive, not repetitive
7. Phones on silent / take important calls outside
8. Be punctual after lunch & breaks
9. Ask anything - there are no stupid questions

Welcome Address

Formal Opening of Two-Day Training

Leadership Moment (01)

The Rebel Officer

- Tunji is skilled at making up his own rules based on the general rules the force has given to rank and file. When he boards a vessel, he queries the seaman's books. If those are in order, he asks for their passports. If those are in order, he asks for the crew contracts. If the crew contracts are in order, he asks to see details of when each crew member joined the voyage. If those are in order, he checks the adequacy of all signatures and stamps. This almost never fails to get vessel captains jittery and agents ready to offer 'something.' Anytime he boards a vessel, he goes home with a few hundred US dollars.

- You are Tunji's colleague and have just been onboarded onto the extended Port Standing Task Team (PSTT). What do you do?

The Rebel Officer – Your Choices

a) You do nothing. Espirit de Corps requires that you show utmost loyalty to your colleagues.
b) You report Tunji to PSTT as you have noticed that nothing anyone says seems to get Tunji to fall in line, and he seems to have powerful people backing him.
c) You chat with Tunji, perhaps he will follow SOPs next time.

STAKEHOLDERS
1. National Coordinator PSTT
2. Your overall unit head
3. The Vessel Captain

Rebels live life by their own rules, disregarding integrity and anti-corruption standards

Group Photograph
&
Tea Break

Preventing Non-Compliance

Compliance Management & The Journey So Far...

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01 02 03 04 05

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The Compliance Solution Landscape

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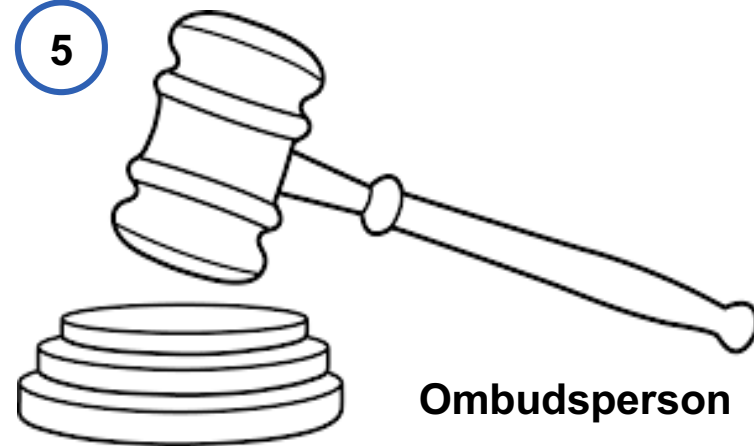
Summary of Key Points

1. Tone-at-the-top
2. The Compliance Leadership Challenge
   a. Managing Upwards
   b. Managing Peers
   c. Managing Subordinates
3. Leadership Communication
4. Training & Standards Setting (training adults)
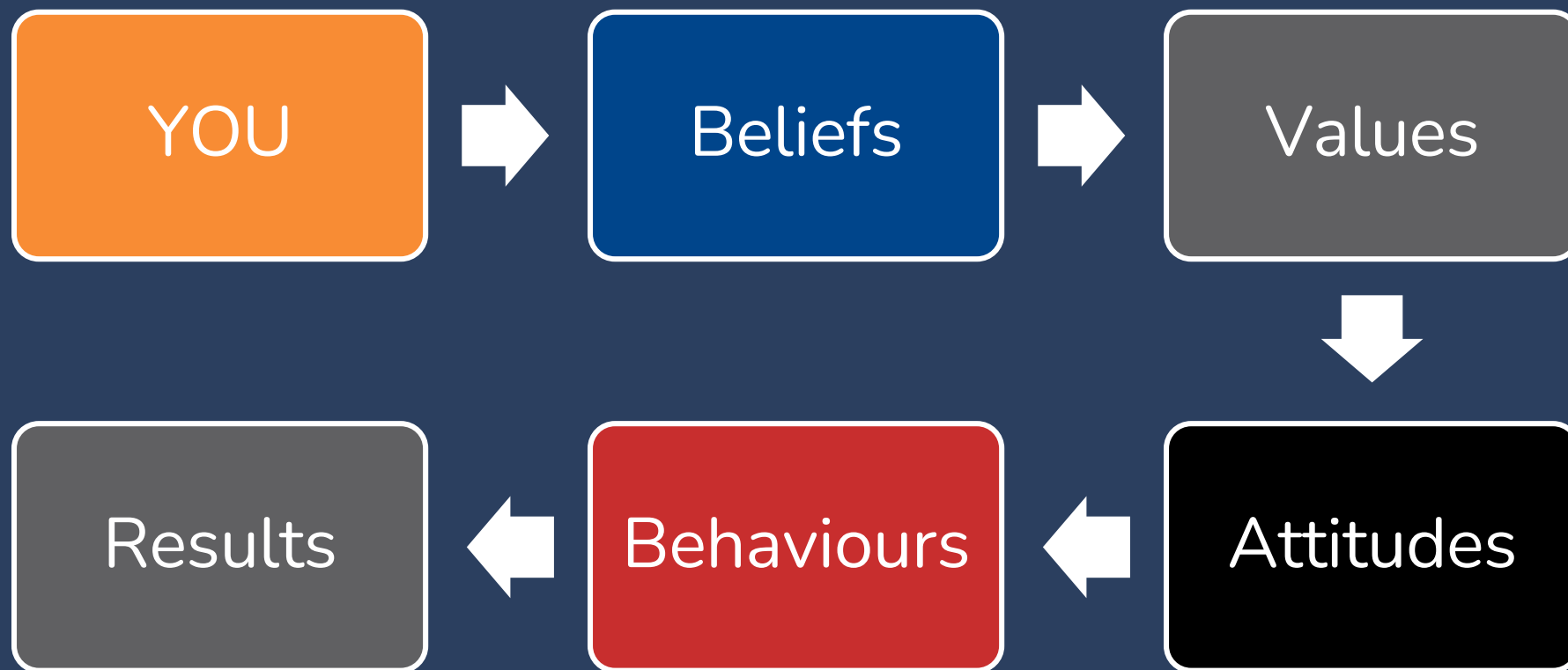5. Incentives & Sanctions as Preventive Measures

Why Are We Here Today?

To **equip** officers
with **Leadership tools**
towards improving efficiency
of seaports and terminals services
in Nigeria
through improved compliance with
Standard Operating Procedures (SOPs),
Nigeria Ports Process Manual (NPPM),
and more effective use of the
Grievance Reporting Mechanism (GRM)

Outline

1	**2**	**3**	**4**
Principles-Centered Leadership	Transformational Leadership Mindset	Leading with Influence	Problem-solving & Decision-making

Course Content

1
Principles-Centered Leadership

- Why leadership? The 10/10 Principle
- Law of Multiplicative Growth
- Compliance vs Commitment
- Values-based Leadership
- The Free-rider Problem

2
Transformational Leadership Mindset

- Leading from the Middle
- Becoming a 360 degree leader
- Taking Ownership: The QBQ
- From ICQ to QBQ

3
Leading with Influence

- The 5 levels of Influence
- Key Communication Skills for Leaders
- The Naked Truth about Listening
- Listen with FLOAT model

4
Problem-solving & Decision-making

- The Creative Problem-solving Process
- Ideation
- The Ideas Matrix
- Biases in Decision-making

1. Principles-Centered Leadership

Principles-Centered Leadership

Why Leadership?

What is Leadership?

Values-Based Leadership

Why Leadership? – The 10/10 Principle

❑ The Level of Leadership determines the productivity and results that teams and organizations achieve

❑ If the quality of leadership is at 4 out of 10, then the organization can only achieve results that are less than 4 out of 10

❑ If the quality of leadership is at 10 out of 10, then the organization or team will achieve 10 out of 10 results

The Law of Multiplicative Growth

❑ When leaders lead FOLLOWERS they achieve at best ADDITIVE GROWTH - This years result = last year's result plus YYY

❑ When leaders lead LEADERS they achieve MULTIPLICATIVE GROWTH – This years result = last year's result multiplied by YYY

❑ Every organization wants to multiply growth, and need to lead LEADERS

Leadership Is About COMMITMENT

COMPLIANCE	COMMITMENT
Doing what you are told to do only whern you have to do it	**Going beyond** – taking ownership and determing what is the right thing to do
Doing the minimum expected – ticking boxes	**Going beyond** – making sacrifices out of a deep love for what you do
Doing what you can to avoid punishments and sanctions	**Going beyond** – fostering a culture of service and performance

Engagement & Change Enablement

OPEN
Colleagues are partners and readily volunteer information. The system uses everyone's abilities & insights to the full

Deep

Commitment

Conviction

Compliance

Superficial

TWO-WAY
Show-&-Tell how to comply, feedback elicited but no guarantees of change given

Case Study – The Free Rider Problem

A community of friends have decided to organize a Bring-Your-Food party. They all hope to have the very best meals – jollof rice, pounded yam and bouillabaise and lasagna.

The Amaechis say to themselves: since the Abubakars are here they will bring meats, chicken and rice, so we will just bring ground nut and water.

The Abubakars believe the Akindeles will bring pounded yam and egusi so they too bring ground nut and water.

The Akindeles are sure that the Durands will bring bouillabaisse and the Di Angelos will bring lasagna, so they too decide to bring ground nuts and water.
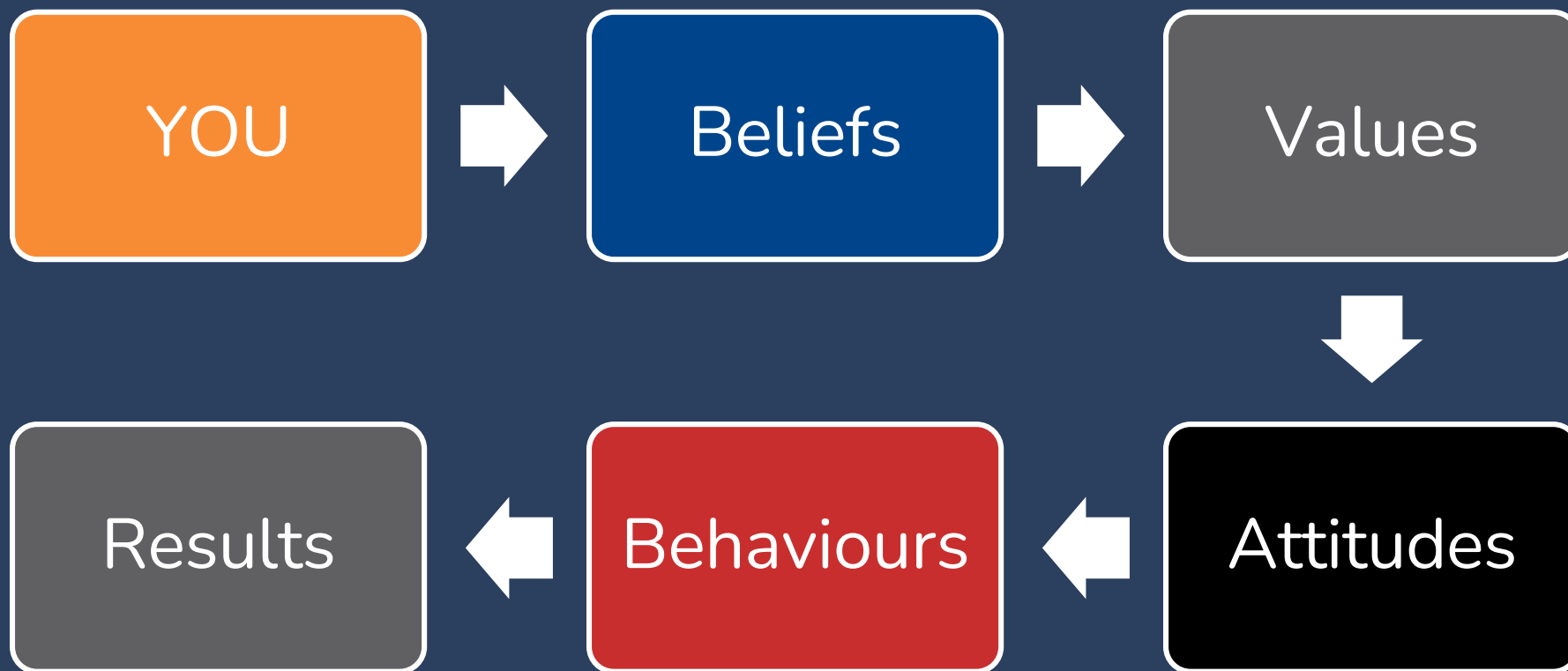
The Durands and the Di Angelos think their Nigerian friends will bring jollof rice and fried plaintains (dodo) which they love, so they bring cheese, olives and breadsticks.

What will this community of friends be having for dinner? and Why?

Values-Based Leadership

```
YOU → Beliefs → Values
                   ↓
Results ← Behaviours ← Attitudes
```

Group Discussions

❑ How do these models explain some of the results that we are achieving as a country?

❑ What do they say about the actual beliefs and values that most people have in our country?

❑ What can you do differently, and what difference will it make?

❑ What does it take to make a prosperous and peaceful society based on the lessons learned from free-rider problem?

2. Transformational Leadership Mindset

Transformational Leadership Mindset

Leading from the Middle

Becoming a 360 degree Leader

Taking Ownership
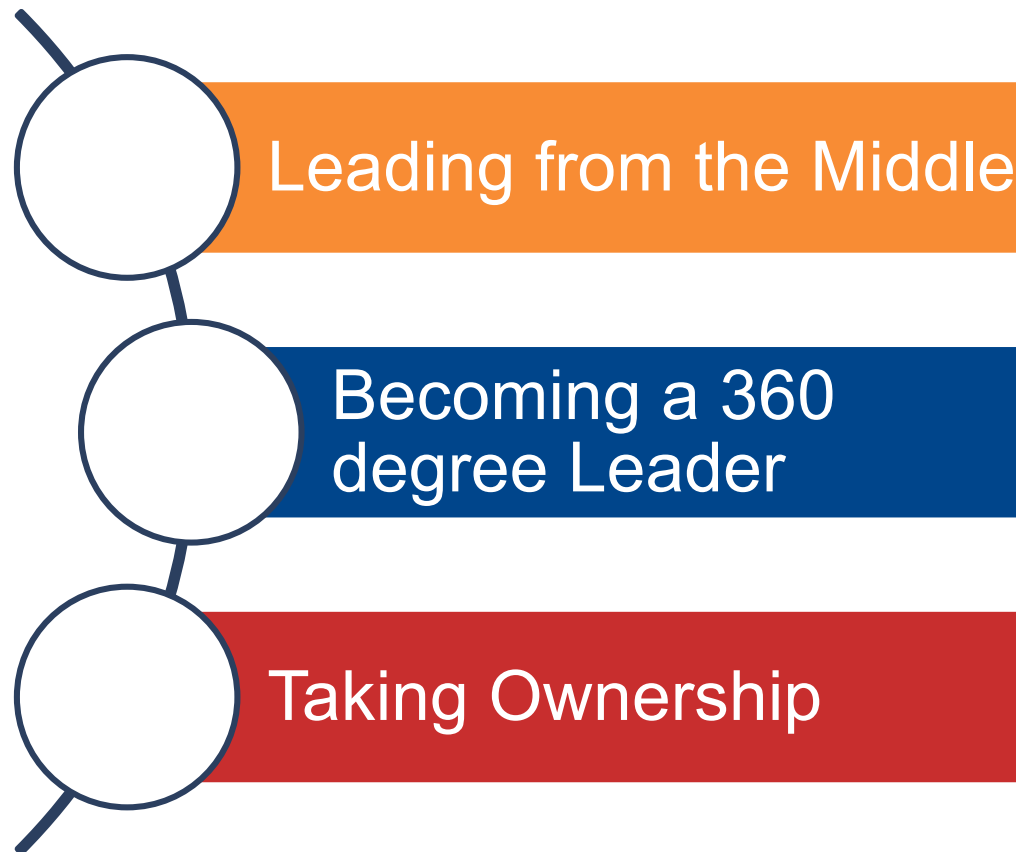
Leading From the Middle

According to Profressor Pat Utomi of the Center for Values in Leadership, one of the greatest impediments to the success of leaders in the middle is the "Discriminant Operant Model of Classical Conditioning" (Eye-Service)

"Do not focus on pleasing your supervisors and bosses, focus on leading and influencing everyone"

Debriefing Your Assessment: Activity

Your reflections
- What have you learned or become aware of from reading your leadership assessment report?

Your highest scoring items
- How are your strengths working for you
- How can you make more use of your strengths to your own and your organisation's advantage?

Your lowest scoring areas
- How are areas in which you are less strong limiting or hindering your performance?
- What actions can you take to address your development areas?

Areas Requiring Attention	Action Required	Support Required	How Will I Measure Success?	By When?

Becoming a 360 Degree Leader: Activity

The Eye Service Leader	The 360 Degree Leader
When I get to become a senior leader then I will start to push my own initiatives. Until then, I will just be doing what the ogas want	
When I was a younger professional, the ogas dealt with me. When I get to the top, I will do the same	
If I raise any concerns/issues about my colleagues "they" will say that I am selling out	

Taking Ownership – The QBQ

- [ ] When faced with a challenge or problem, we usually respond by whining or complaining.
- [ ] This does not lead to any meaningful action or change
- [ ] You can transform your whining and complaints into tangible actions by first reframing your thoughts and asking the right questions
- [ ] The Question behind the Question (QBQ) Framework helps us to reframe our thoughts and take action
- [ ] We need to reframe our inappropriate thoughts (incorrect questions - ICQs) using the QBQ

From ICQ to QBQ

Incorrect Question	Question Behind the Question
Uses third-party pronouns like We, They, You	Uses personal pronoun – I
Uses Question prompts that pass the blame like who, why	Uses question prompts that take ownserhip like What, How
Focuses on the past	Focuses on the future
Doesn't create any action	Creates immediate action
e.g. Why is the photocopier always having problems?	e.g. How can I fix the problems with the copier?

Case Study - Ola

Ola is a passenger operations supervisor at the Ports. He has really had a stressful day with his boss breathing over his neck about compliance reports that are over due from the previous week that clearly were not his fault, because his team members from other units made mistakes with the format and entries.

As if all that wahala from his boss was not bad enough, there are just too many ships berthing today and a huge backlog of passenger and cargo issues to deal with owing to the COVID-19 issues.

To crown what has been a crazy week for Ola and his colleagues are the incessant IT issues that they have been experiencing that is slowing down the system and the customers are complaining.

Let's examine the thoughts that flash through Ola's head. How can improving his thoughts improve the results he achieves.
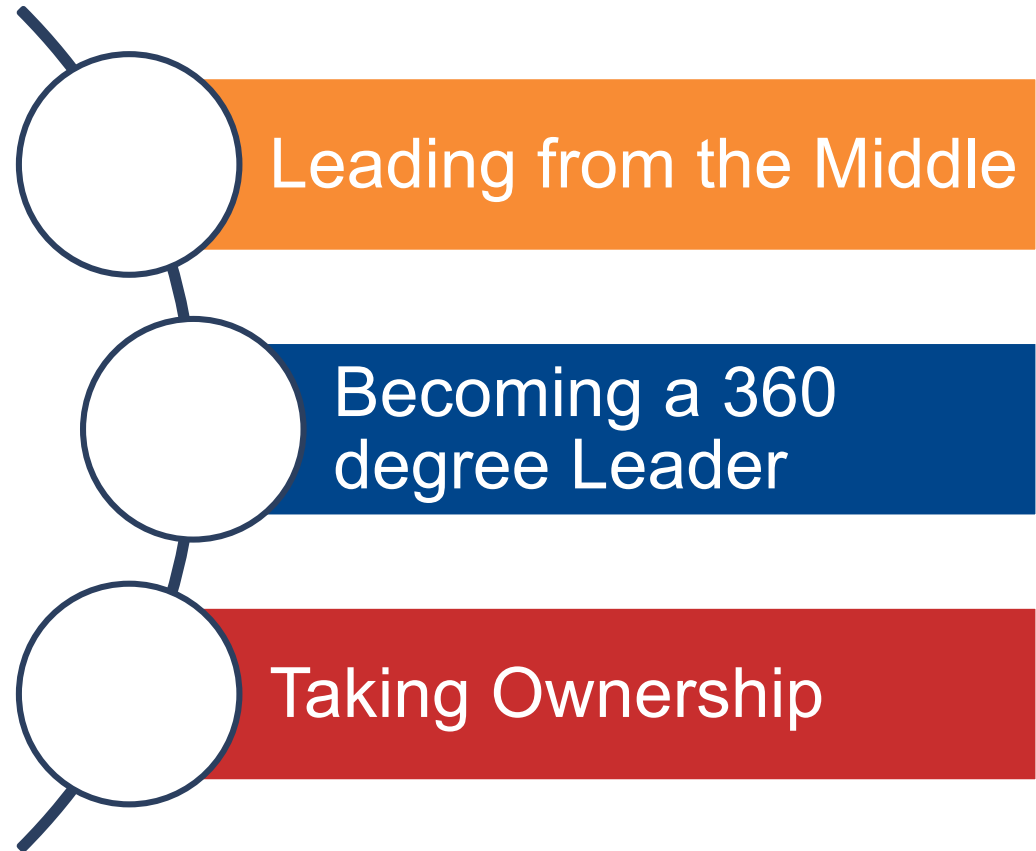
QBQ Practice

| ICQ	QBQ	Resultant Actions
Why is my boss always making things difficult for me?		
Who has bungled these reports again?		
Why cant we just get more hands to do this work?		
Why are these IT people not available to ensure this network works		

REVIEW: Transformational Leadership Mindset

Leading from the Middle

Becoming a 360 degree Leader

Taking Ownership

Leadership Teambuilding Energiser: TRAFFIC JAM
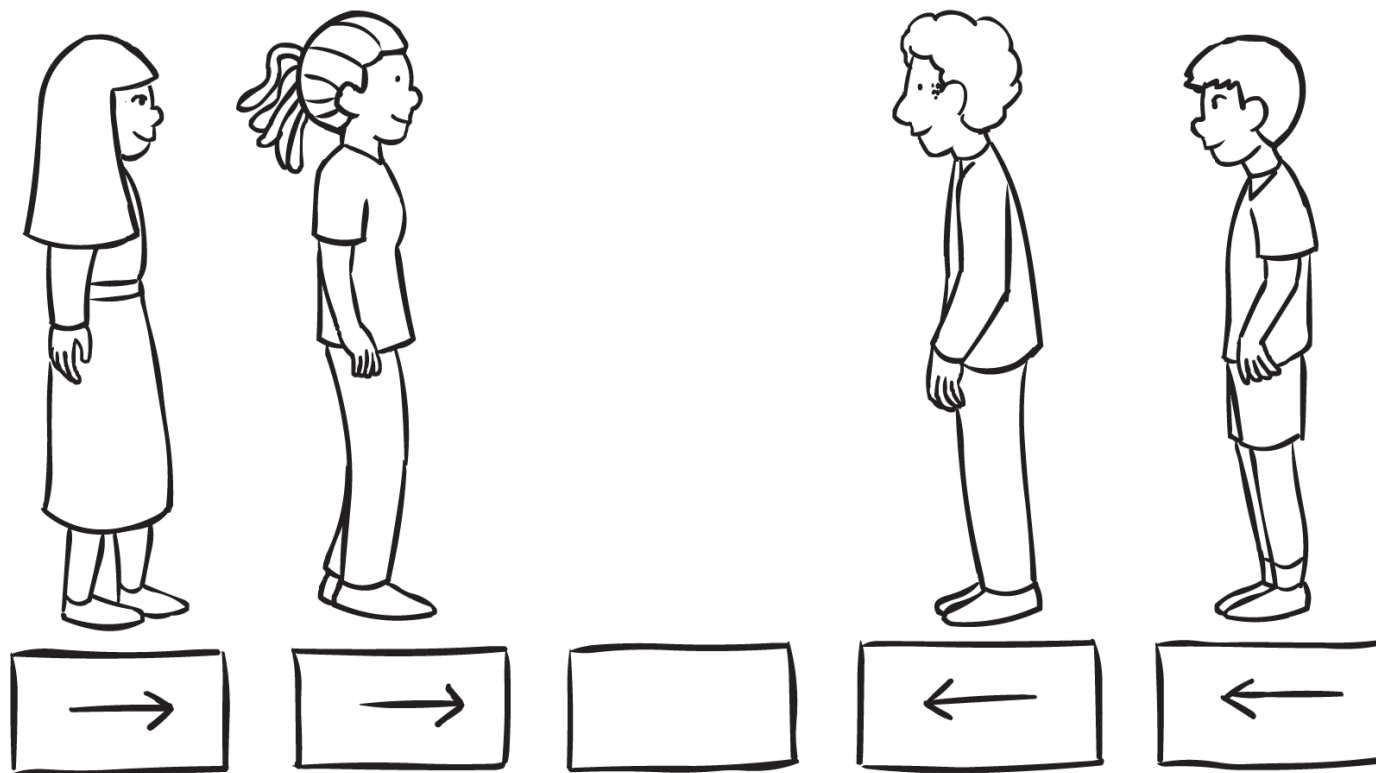
3. Leading With Influence
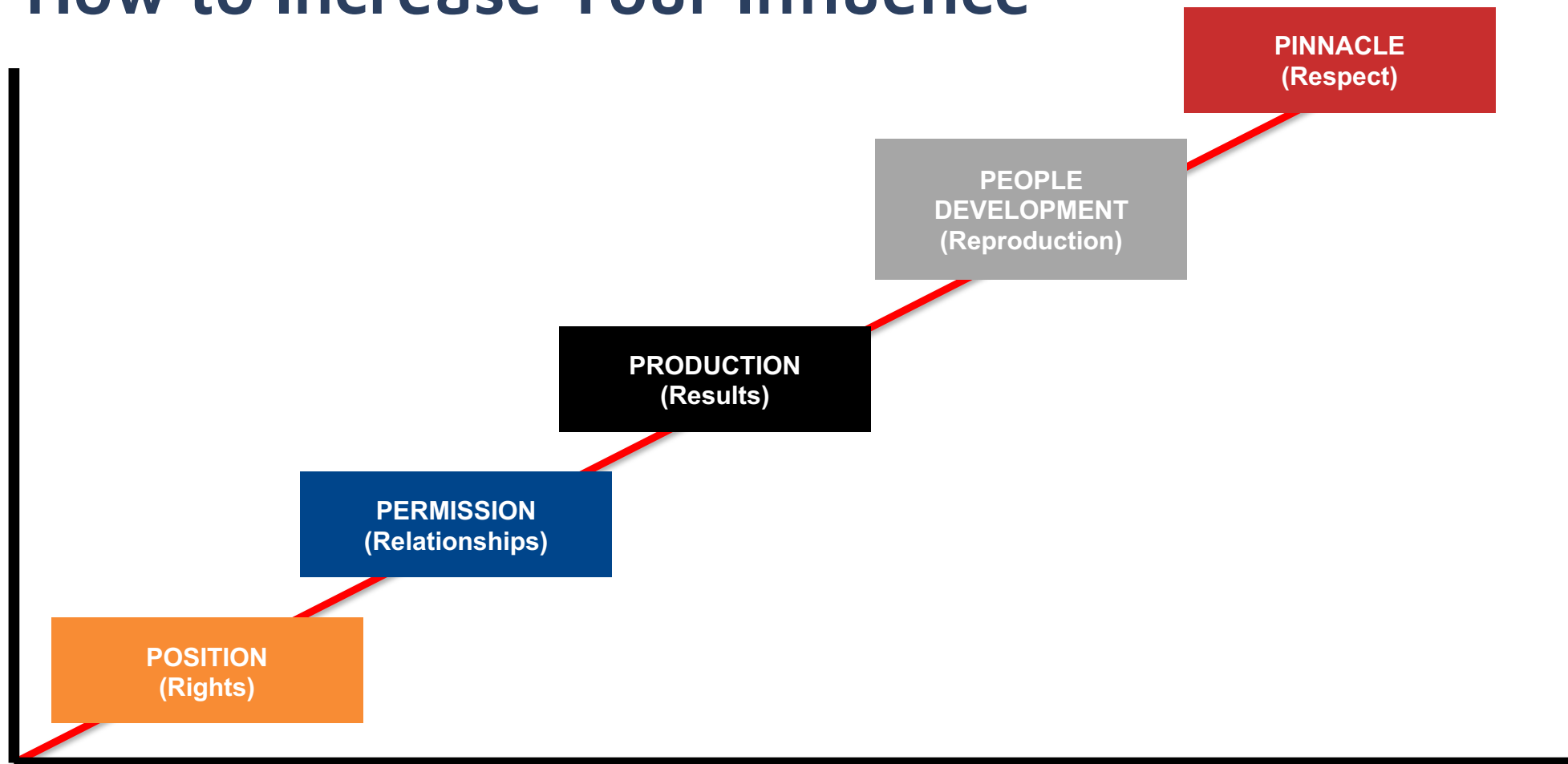
How to Increase Your Influence

The Rules of the 5 Levels of Influence

The NO JUMP Rule

When building your influence with others you must progress from one level to another, ensuring that you have achieved the previous level before going to the next. You cannot skip or jump levels

The RESTART Rule

When a new person joins your team or if you join a new team, you need to restart from the lowest level with the new person or with the people in your new team, no matter how successful you have been as a leader previously

DIFFERENT LEVELS Rule

You will be at different levels of influence with different people. It is important to recognize this, measure where you are with people, and develop a unique strategy to grow and sustain your influence with each person

Case Study - Ebi

Ebi has just been transferred to a new unit at the port and she needs to hit the ground running in getting her team to perform. Some of her team members have worked in that unit for many years and believe that they should have been the ones to be promoted to lead the Unit – they are not happy that Ebi has come from outside to take that position.

Ebi's supervisor is very clear about the results that he wants especially in ensuring adherence to the SOPs, quick turn-around on tasks and strict adherence to the compliance expectations.

How can Ebi settle into her new job and team. How will the 5 Levels of Influence Framework help her to achieve this?

Key Communication Skills for Leaders

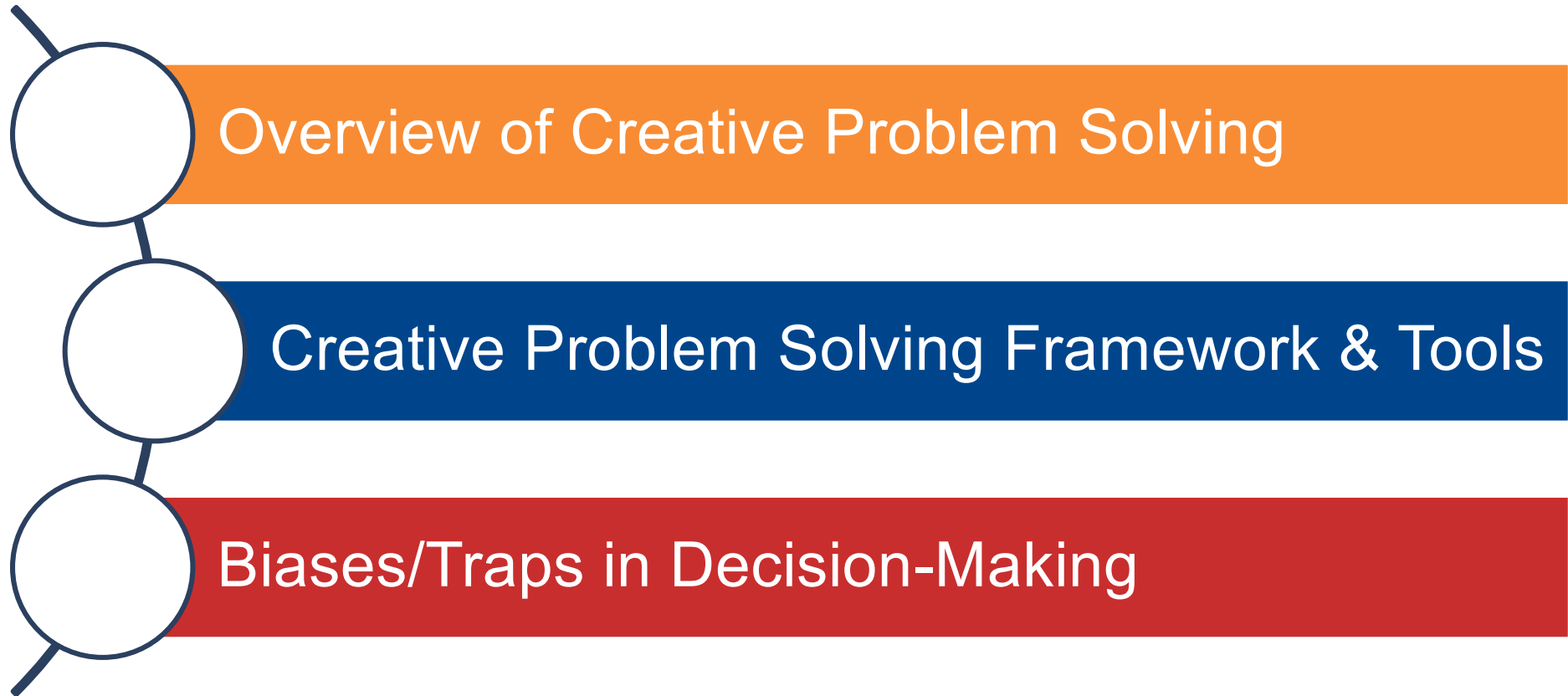|		
Listening	Thinking	Speaking
Writing	Collaborating	Giving & Receiving Feedback

4. Creative Problem Solving & Decision Making

Creative Problem Solving & Decision Making

Overview of Creative Problem Solving

Creative Problem Solving Framework & Tools
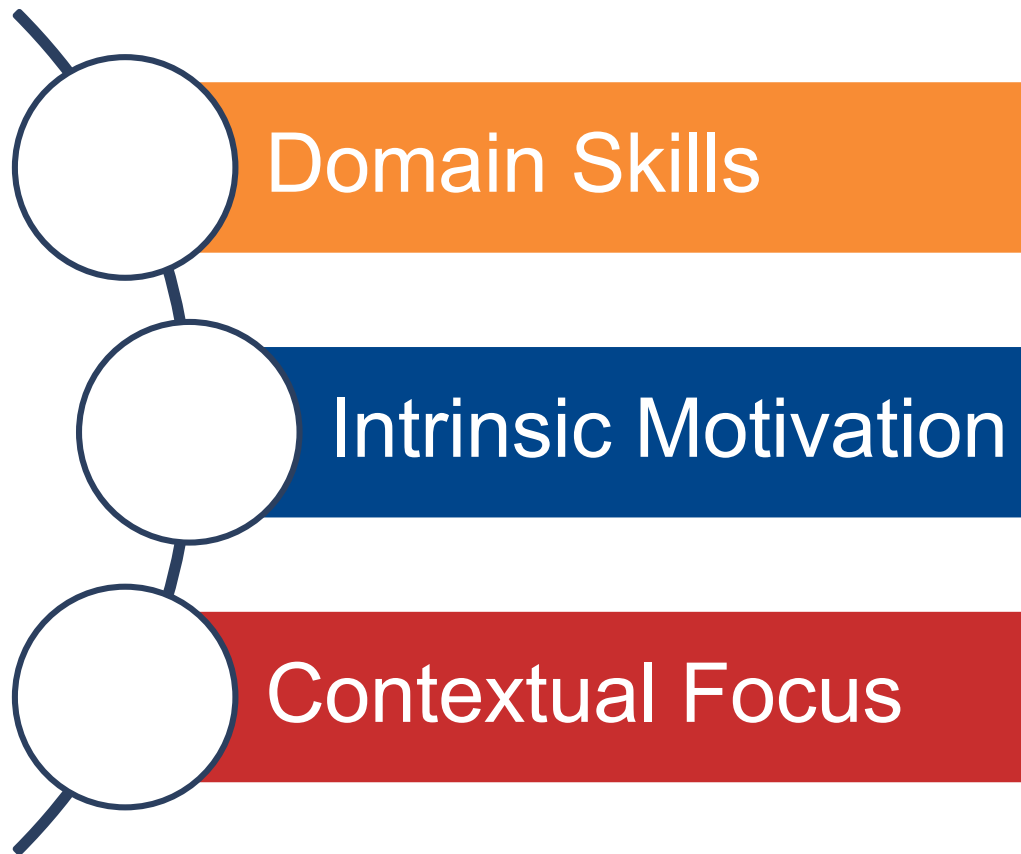
Biases/Traps in Decision-Making

Why Creative Problem Solving?

- We are all faced with problems, challenges, goals and opportunities each day.
- As the work gets more complex, these scenarios require more than just straight-forward or obvious solutions.
- They require us to understand the issues, think critically, come up with options, and implement the best options.
- The skills for creative problem solving will help us to achieve these
- Without creative problem-solving skills, most people will be very dependent on their managers for solutions to everything
- Without creative problem-solving skills we will make sub-optimal decisions for our teams and organizations
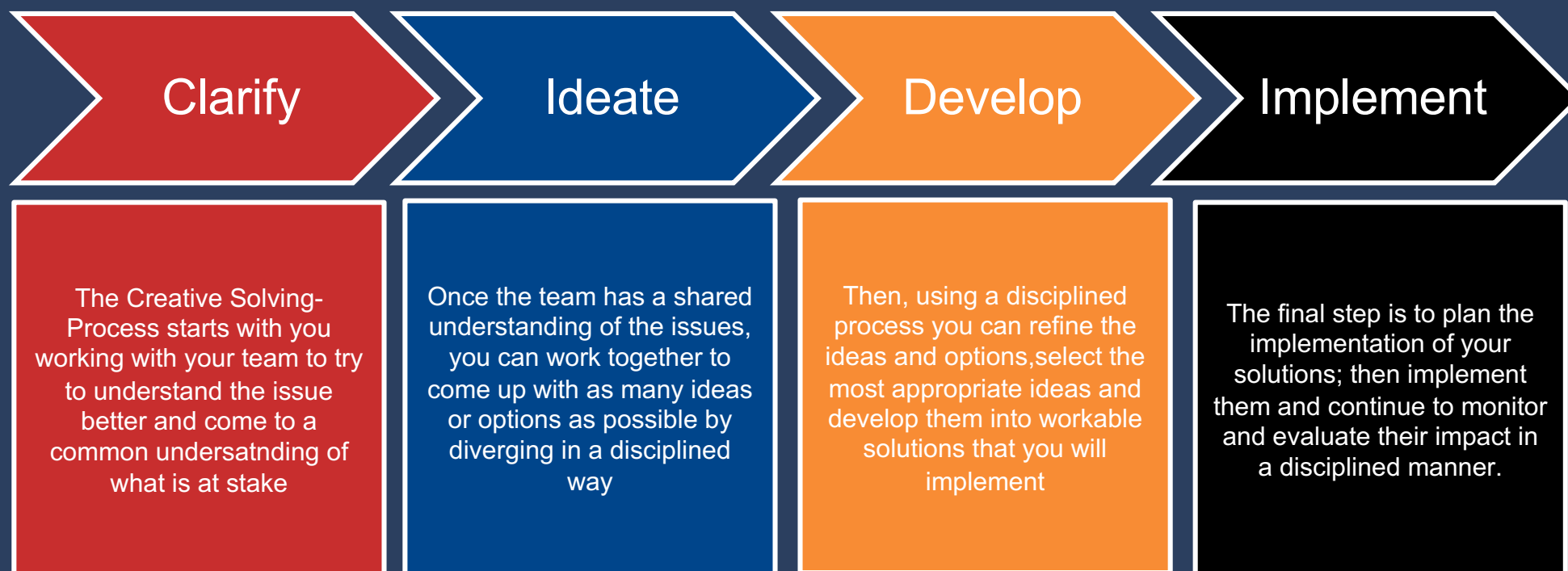
What Does It Take to Be Creative?

Domain Skills

Intrinsic Motivation

Contextual Focus

The Creative Problem Solving Process

Clarify	Ideate	Develop	Implement
The Creative Solving-Process starts with you working with your team to try to understand the issue better and come to a common undersatnding of what is at stake	Once the team has a shared understanding of the issues, you can work together to come up with as many ideas or options as possible by diverging in a disciplined way	Then, using a disciplined process you can refine the ideas and options,select the most appropriate ideas and develop them into workable solutions that you will implement	The final step is to plan the implementation of your solutions; then implement them and continue to monitor and evaluate their impact in a disciplined manner.

Biases/Traps in Decision Making

Biases/Traps	Description	Strategy to Overcome It
Anchoring Trap	Taking a decision based on information that was first provided	Try to view problems from as many perspectives as possible and keep an open mind. When negotiating, anchor first.
Status-Quo Trap	Focusing too much on the way things have been done already	Imagine that the status-quo doesn't exist, what will you do
Sunk Cost Trap	Holding on to a course of action because you have spent a lot of time and energy on that course even if it is no longer viable	Get the input of others who were not there when you chose that course in the first place.
Confirming Evidence Trap	Always listening to only information that supports your decision	Seek information from various sources, e,g. CNN vs. Fox News

How Adults Learn

A Practical Guide to Stepping-Down Training

Approach to Training Adults

❌ FORMAL INSTRUCTION

✅ PARTICIPATORY LEARNING

Adult Participants

- Adult participants are treated with Respect
- Allowed to Reason out concerns
- Are given Roles in the training
- Lean on their understanding of the Relationships between the known and the new and
- Are motivated by Rewards such as affirmation of progress

Your Approach

We challenge their:

- Knowledge
- Leadership
- Attitudes
- Skills
- Ability to learn from errors

We build up their:

- Knowledge
- Comprehension
- Application
- Analysis
- Synthesis
- Evaluation

VISUAL, AUDITORY AND THOSE WHO LEARN BY DOING WILL FIND MORE THAN ENOUGH TO STIMULATE THE SENSES

Your Approach

In each of the sessions, you should:

Motivate	Inform	Strategise	Apply
The Creative Solving-Process starts with you working with your team to try to understand the issue better and come to a common undersatnding of what is at stake	Once the team has a shared understanding of the issues, you can work together to come up with as many ideas or options as possible by diverging in a disciplined way	Then, using a disciplined process you can refine the ideas and options,select the most appropriate ideas and develop them into workable solutions that you will implement	The final step is to plan the implementation of your solutions; then implement them and continue to monitor and evaluate their impact in a disciplined manner.

Approach Should Be Activity-Based

A good, varied combination of the following activities should be used:

- Brainstorming
- Case Study
- Debate
- Demonstration
- Fishbowl
- Force field analysis
- Group work
- Guest Interviews

- Jigsaw
- Participant Lecturer
- Pair Work
- Priority Ranking
- Quiz
- Role Play
- Silent Reading
- Story telling/Analogies

Content Interactions

INTERACTIONS	POSSIBLE NEGATIVE IMPACT
Expert Input	Stifles input and creativity
Opposing	Develops competition not team
Defend/Attack	Personalises disagreements
Self-authorizing	Leads to lack of group support
Forcing	Can create resentment
Gate Closing	Leads to loss of valuable inputs

Content Interactions

INTERACTIONS	POSITIVE IMPACT
Seeking Input	Ideas, , Teamwork, Two-Way Communication
Supporting	Improves Morale, Traps Inputs
Springboarding	Good listening/Expanding outputs
Sharing Feelings	Develops Trust, Good Relations
Testing Understanding	Proactively removing obstacles
Summarising	Focus & Clarifying Understanding
Seeking Agreement	Ensures Commitment, Flexibility
Gate Opening	Equal participation & teamwork
Structuring	Channels group energies on task

Filters We All Bring to Facilitation

- Self-Perceptions
- Emotions
- Stereotypes
- Expectations
- Values
- Beliefs
- Concerns
- Previous Experience
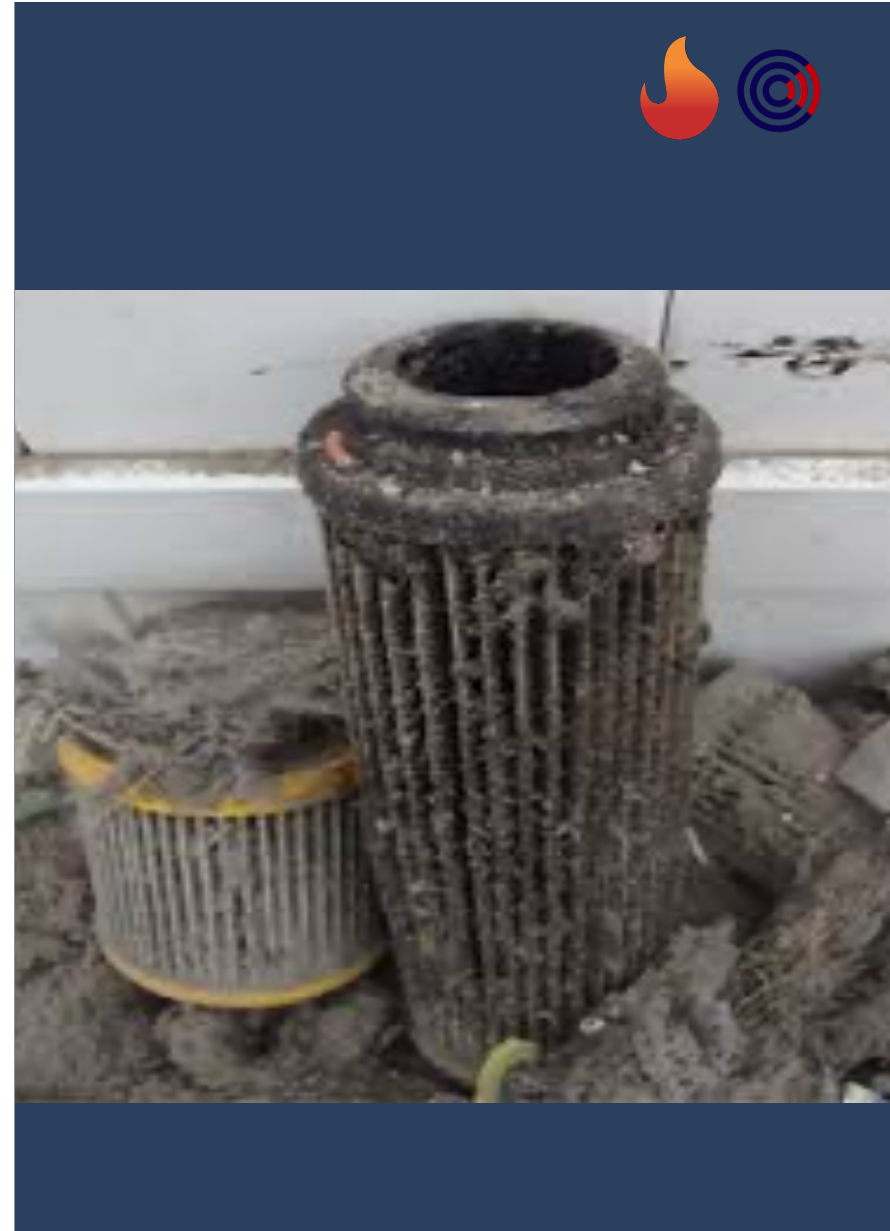
Effective Strategic Communication

Effective strategic communication is persuasive, aimed at creating, reinforcing, or changing beliefs or actions. It involves repetition, and makes use of a variety of teaching methods and multimedia to get a message across. It must be:

Clear

Credible

Consistent

Incentives & Sanctions As Preventive Measures: Why do people do right?

- To avoid punishment?
- To take advantage of rewards?
- To impress their circle of friends?
- To be seen as law abiding?
- For the common good of the majority?
- To ensure justice for all?

(Kholberg, 1981)

Negative Incentives

Weak Enforcement

Weak Institutions

Detecting Non-Compliance

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Ethics & Integrity Policy

The Compliance Solution Landscape

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Standard Operating Procedures (SOPs) ③

Local Help Desk Team ④

Ombudsperson ⑤

GRM ⑥

Accountability ⑦

Leadership Moment (02)

The Opportunist Officer

- MV Vital Star, IMO 9999990 is calling Warri Port for the first time. It is a Saturday evening and officers have conducted their joint boarding. The vessel is due to sail in a few hours. An officer insists six of the Seaman's books are not valid since they were not signed. The captain argues that FlagState does not sign but instead stamps the Seaman's books, and this has not been an issue at any other port in the world. But one of the officers has now taken the six documents away with him. The vessel is due to sail and the captain now fears there could be an oncost of $20,000 if he doesn't sail as scheduled. The officer is now asking the captain to sign an undertaking that the agent will pay $2,000 per document while the vessel is allowed to sail.
- Emmanuel, the Vessel's protective agent, suggests the captain should accept this. What do you think?

The Opportunist Officer – Your Choices

a) The Captain should pay. Wrong is wrong; even if documents are accepted elsewhere, this is Nigeria!

b) The captain should escalate the matter to PSTT

c) Since there is no clarity and time is short, the captain should negotiate the amount.

STAKEHOLDERS

1. National Coordinator PSTT
2. Your overall unit head
3. The Vessel Captain
4. The Protective Agent

Opportunists take advantage of a corrupt system for personal gain

Summary of Key Points

1. **Setting up Controls for Rapid Detection**
   Tracking pre-arrival notifications
2. **Stakeholder Compliance Certification**
   Tracking performance against SOPs and NPPM
3. **Self-Reporting Channels**
   Comparing with PSSP and MACN HelpDesk Data
4. **Compliance auditing & Monitoring**
   Issuing periodic compliance reports

Compliance Auditing and Monitoring Officers

The role of a Compliance Officer is to ensure that standard operating procedures are followed within their specific agency.
They impose the established incentives and repercussions that promote ease and transparency of business within their agencies.

The Port Standing Task Team (PSTT) are responsible for enforcing corrective actions against corrupt practices and other infractions of SOPs that threaten the integrity of the maritime sector. Their operations span across all Port agencies in conjunction with compliance officers.

Controls for Rapid Detection
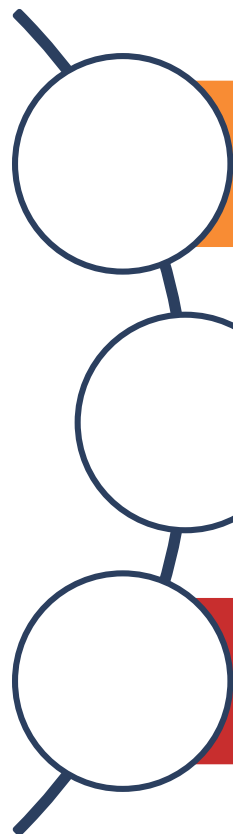
Physical Controls
Eg. Specifying solely Port Health and NDLEA officers jointly board vessels

Time Controls
Eg. Specifying export consignment procedures cannot exceed 30mins

Approvals and Documentation
Eg. Payments, invoices and receipts are confirmed electronically, and Pre-Gate tickets are generated automatically
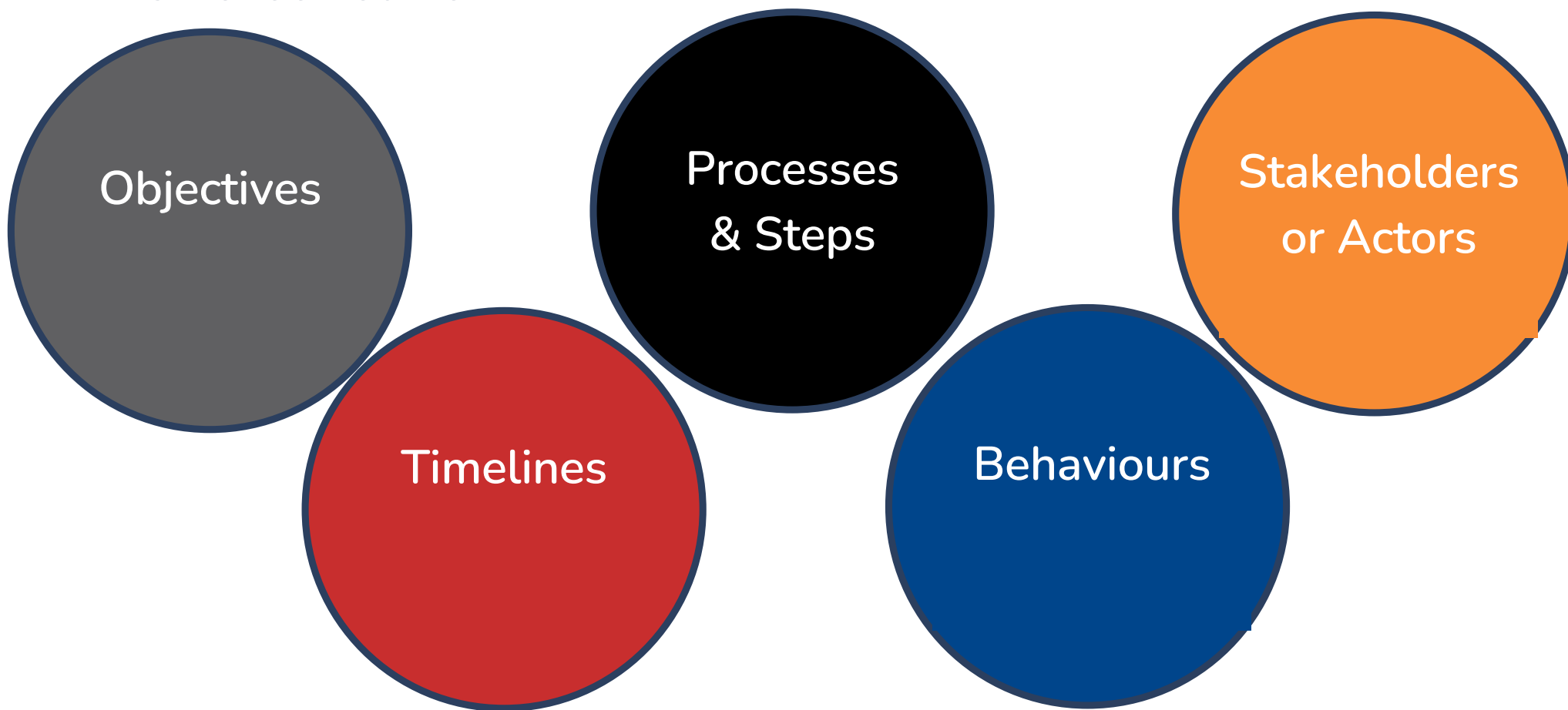
Tracking Pre-arrival Notifications

- Track behaviour of Vessel Captains, Agents, and Officials at
  - Vessel Port Entry
  - Vessel Visit
  - Cargo Clearance, and
  - Exit of Vessel and Cargo

  You will be able to rapidly detect where things are not going according to standard

Compliance Against SOPs and NPPM

What to look out for:

Using Self-Reporting Tools

1

Internal Complaints Unit

Each Agency should have their own office where internal officers and port users can anonymously submit grievances or complaints

2

PortCall Assist Website

Complaints can be tracked and monitored through this website https://www.cbinigeria.com/portcallassist

3

Local HelpDesk

If port users experience any challenges they can call +234 818 738 0696 and email helpdesk@cbinigeria.com or mfadipe@shipperscouncil.gov.ng

4

Port Service Support Portal

You can submit and track status of complaints, queries and port service requests on the website https://pssp.ng/#/about

Importance of Evidence and Documentation

Documentation is critical for:

- Effective control and tracking of cases
- Effective reporting for complainants
- Sets precedence for future cases
- Measuring progress made
- Learning from mistakes
- Catching trends for more sophisticated detection and prevention

Drawing Conclusions from Data

Tools

Controls
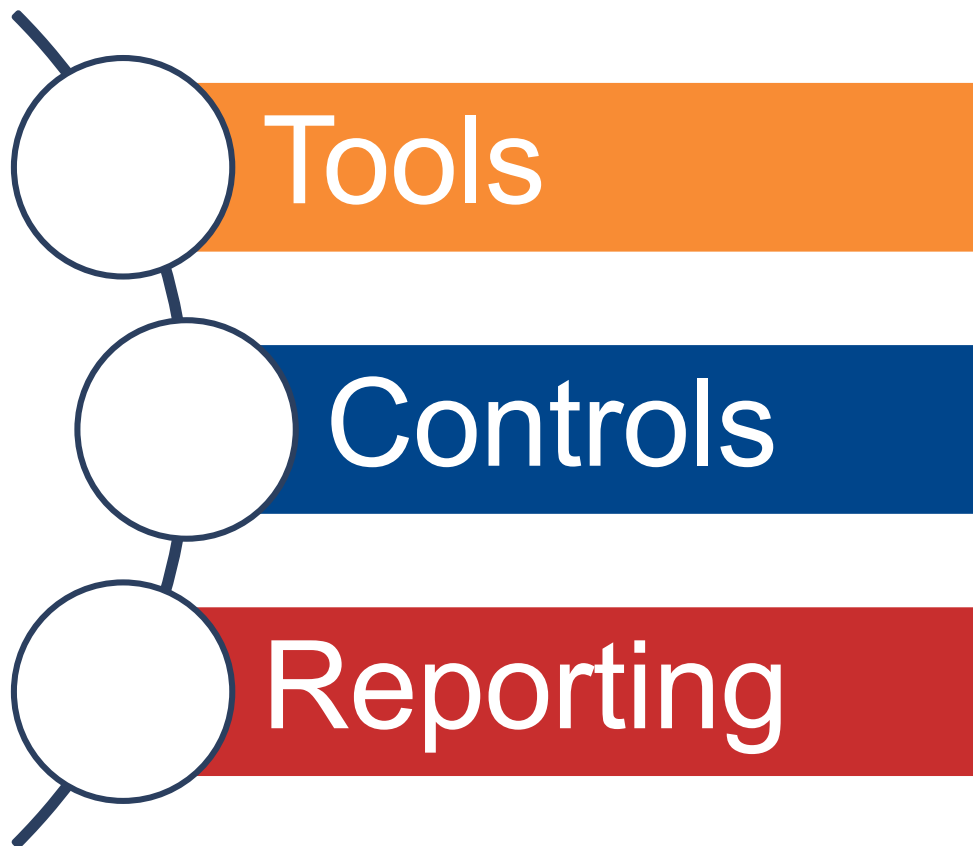
Reporting

Evidence and documentation of cases and operation procedures help to guide future decision making, especially around tools, controls, and reporting.

Investigations help us to understand finer details of why and how roadblocks to transparency and ease of business come about, and thus how to better detect and prevent them.

Auditing and Monitoring

Continuous Internal Monitoring

Internal monitoring is needed to standardise and culturally entrench operating controls and reporting mechanisms. Compliance officers in each agency have a duty to effectively and rapidly detect breaches of compliance Controlling such breaches with appropriate action and solutions

Harmony and Cooperation

Cooperation bewteen internal and external agents in practice includes documentation and information sharing between monitoring and auditing

Periodic External Monitoring

External auditing ensures that Port Agencies are maintaining the highest compliance standards They certify that internal compliance monitoring and controls are relevant, appropriate and in use. Where extreme action needs to be taken, external auditors can provide additional support to internal monitors.

Learning Pillar

Rapid detection is important because it enables you to know quickly if the tools, controls, and governance/reporting arrangements are effective in preventing and detecting deviant behaviour. The patterns and trends discovered in the data gathered through detection provide insight into the adequacy of the entire compliance system, and informs the way you respond to cases of compliance and non-compliance alike.
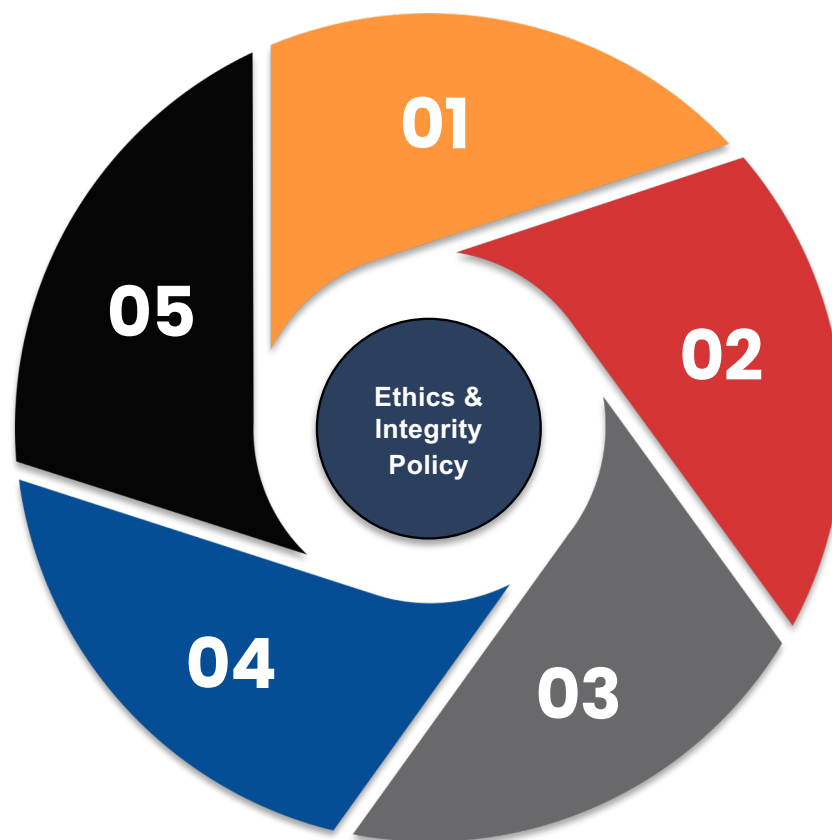
Agenda – Day 2

09:00 – 09:30	**RECAP OF DAY ONE**
09:30 – 10:00	**LEADERSHIP MOMENT (03)**
10:00 – 11:00	**RESPONDING TO NON-COMPLIANCE**
11:00 – 11:30	**TEA/COFFEE BREAK & GROUP PHOTOGRAPH**
11:30 – 12:00	**RESPONDING TO NON-COMPLIANCE**
12:00 – 12:30	**LEADERSHIP MOMENT (04)**
12:30 – 13:30	**EVALUATING NON-COMPLIANCE PATTERNS**
13:30 – 14:30	**LUNCH BREAK**
14:30 – 15:00	**LEADERSHIP MOMENT (05)**
15:00 – 16:30	**DEFINING RISK OF NON-COMPLIANCE**
16:30 – 17:30	**WRAP-UP & CLOSING OF TRAINING/PRESENTATION OF CERTIFICATES**

Responding to Non-Compliance

Compliance Management & The Journey So Far...

01 DEFINE

- Assess Risks
- Align Policies & Procedures to Risks
- Define Risk Profile
- Map Risks to roles & functions

02 PREVENT

- "Tone at the Top" (Political Will)
- Training & Education on Policy
- Facilitated Workshops
- Communication

03 DETECT & MONITOR

- Controls for Rapid Detection
- Stakeholder Compliance Certification
- Self-Reporting Channels
- Compliance auditing & Monitoring

05 EVALUATE

- Metrics & Benchmarks
- Policies, Practices & Procedures
- Reports & Actions
- System Improvements

04 RESPOND

- Case identification, investigation & closure
- Redress - Corrective Actions including sanctions (CMF)
- Root Cause Analysis
- Communication of Resolution

Ethics & Integrity Policy

http://www.compliancebuilding.com/2009/02/25/the-2008-lrn-ethics-and-compliance-risk-management-practices-report/

The Compliance Solution Landscape

Vessel Captains and Agents (1)

Ports Officials (2)

Standard Operating Procedures (SOPs) (3)

Local Help Desk Team (4)

Ombudsperson (5)

GRM (6)

Accountability (7)

Leadership Moment (03)

The Survivalist Officer

- The practice for many decades has been for Captains to give 'gift' items from the galley to officers boarding the vessel. Maduka is an officer who joined the unit understanding this to be one of the job's perks. He was offered tea and scones on board, and when the discussions lingered, he also shared lunch with the captain. When it was time to disembark, Maduka requested two boxes of frozen fish and two boxes of frozen turkey wings which he had a Stevedore carry off the vessel for him. As he reached the quay he was shocked to be accosted by men of the PSTT.
- You are Maduka's boss and you have just received a call from him asking you to help rescue him from the PSTT net. What do you do?

The Survivalist Officer – Your Choices

a) You call the PSTT National Coordinator and ask him to leave your officer alone since everybody is doing it, and he may be victimizing Maduka.

b) You tell Maduka to review the Standard Operating Procedures and see that times have changed and that such behaviour is no longer tolerated.

c) You step up compliance training for your officers to understand SOPs, the GRM and the Consequence Management Framework.

STAKEHOLDERS
1. National Coordinator PSTT
2. Officers in your unit
3. The Vessel Captain
4. Officer Maduka

Survivalists feel disempowered by the corrupt practices of the country and thus succumb to such practices to get by

Summary of Key Points

1. Case identification, investigation & closure
2. Redress – Corrective Actions including solutions like Consequence Management Framework (CMF)
3. Root Cause Analysis
4. Communication of Resolution

Case Management

Respond

Learning Objectives

To enable participants to:
1. Improve capacity to identify investigate, and close cases.
2. Implement appropriate corrective action on identified non-compliance issues.
3. Identify root cause of reports of non-compliance.
4. Communicate resolution adequately to explain any action taken.

Establishing a Case Management System

Case Management is the process for managing data relationships, documentation, and procedures for complaints/incidents that require action and resolution. A proper Case Management System ensures the data received to launch an investigation is verified and accurate, that each step or action taken is transparent and objective, and that a resolution is reached and communicated in a timely manner.

Case Management

Establish self-reporting channels for confidential disclosure of noncompliance (useable by both internal officers and external stakeholders)	Establish Investigative Authority within agency (involving independent employee certification) to track self reporting and follow through on complaints	Continuous Monitoring of Compliance through regular and familiar use of reporting tools and controls, as well as worksite inspections and risk assessment
Appropriate documentation and aggregated data from compliance systems to enable learning from older cases, tracking progress, and streamlining management processes	Periodic Auditing of Compliance by independent investigative authority (such as the PSTT) to ensure that standards are being upheld across agencies	Relevant response to complaints and corrective action against violations such that witnesses are protected from retaliation and future detection and reporting is encouraged

Case Management

There are two main steps to case management:

1. Receiving reports from approved sources (introduced in "Detect")
2. Case administration
    1. Logging reports with an assigned Case ID
    2. Conducting an investigation
    3. Creating timestamped reports and records
    4. Case communication and closure (Case referral if necessary)

Receiving Reports from Approved Sources 🔥 ◎

It is important to only work with reports that come through official channels:

1

Port Service Support Portal

https://pssp.ng/#/

2

PortCall Assist Website

https://www.cbinigeria.com/portcallassist

3

Local HelpDesk Manager

(direct email)

4

Referred by Agency Official

Original submission MUST come from PSSP, PortCall Assist, or Local HelpDesk

Case Administration Actors

System Admin	Port User	HelpDesk Manager	Acting Agency
The overall administrator(s) who govern use of the tools/systems for cases	The individual(s) who lodge the complaint	Then individuals who creates, validates, updates, refers, and tracks cases in the system	The MAIN agency/individuals who take the steps to resolve a complaint/issue, and updates the case response in the system

Compliance Officers play a critical role under "Main Acting Agency"

Conducting Investigations

The purpose of an Investigation is to determine the cause of a breach, whether it was an isolated incident or a deliberate act, and what other factors may have influenced the breach, including the likelihood of such a breach occurring in the future.

```
┌─────────────────────────┐        ┌─────────────────────────┐
│  Establish the          │   ▶    │  Assess the credibility │
│  Investigative Authority │        │  of the compliance      │
│  or Committee within     │        │  breach report          │
│  your Agency            │        │                         │
└─────────────────────────┘        └─────────────────────────┘
                                              │
                                              ▼
┌─────────────────────────┐        ┌─────────────────────────┐
│  Begin formal           │   ◀    │  Obtain and review all  │
│  investigation          │        │  pertinent data and     │
│                         │        │  documents to conduct   │
│                         │        │  preliminary fact-finding │
└─────────────────────────┘        └─────────────────────────┘
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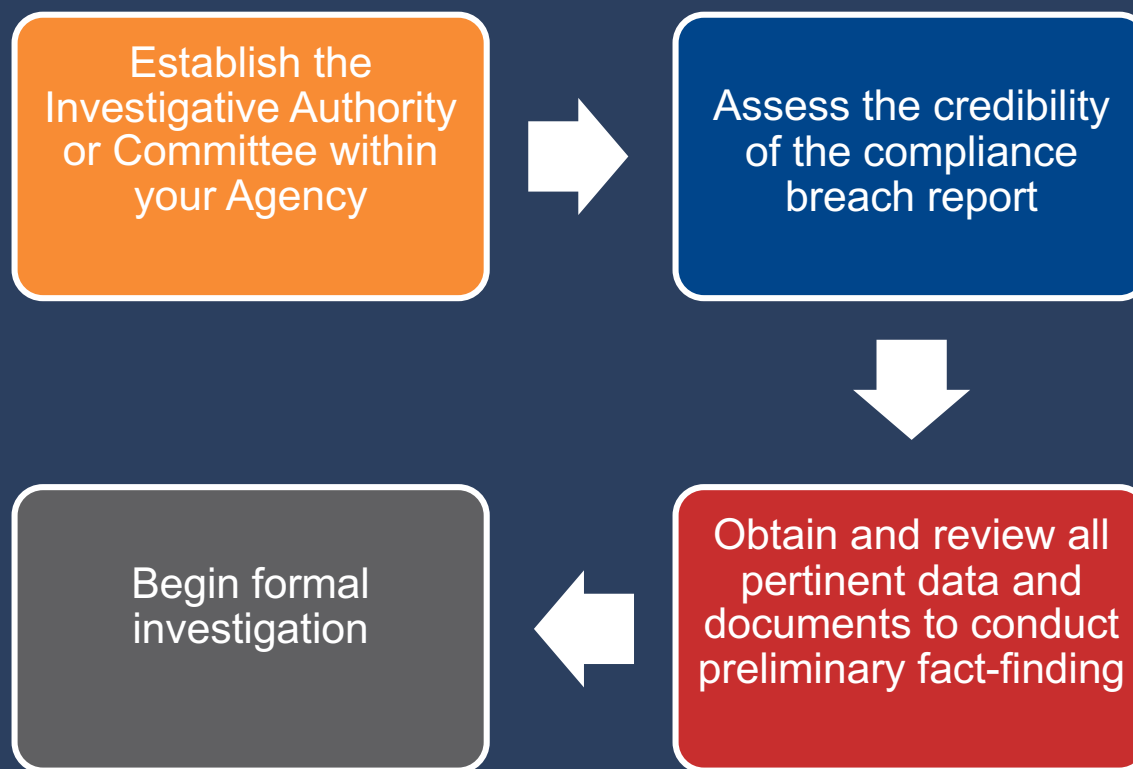
Key Principles of Conducting Investigations

1. Apply discretion. Share details on a "need-to-know basis"
2. Control and track Information
3. Debrief Complainants
4. Ensure fairness and impartiality
5. Maintain chain of custody of all evidence supplied
6. Remain focused on purpose and objective of investigation
7. Remain flexible as things evolve
8. Take steps to prevent retaliation
9. Consult with Management
10. Report in a timely fashion

Main Acting Agency: Resolving Complaints

Receive valid complaints/feedback/and issues

Conducts investigation on the complaints/issues

Resolves issues and provide feedback at each stage

Assess reports, statistics and analytics based on complaints received
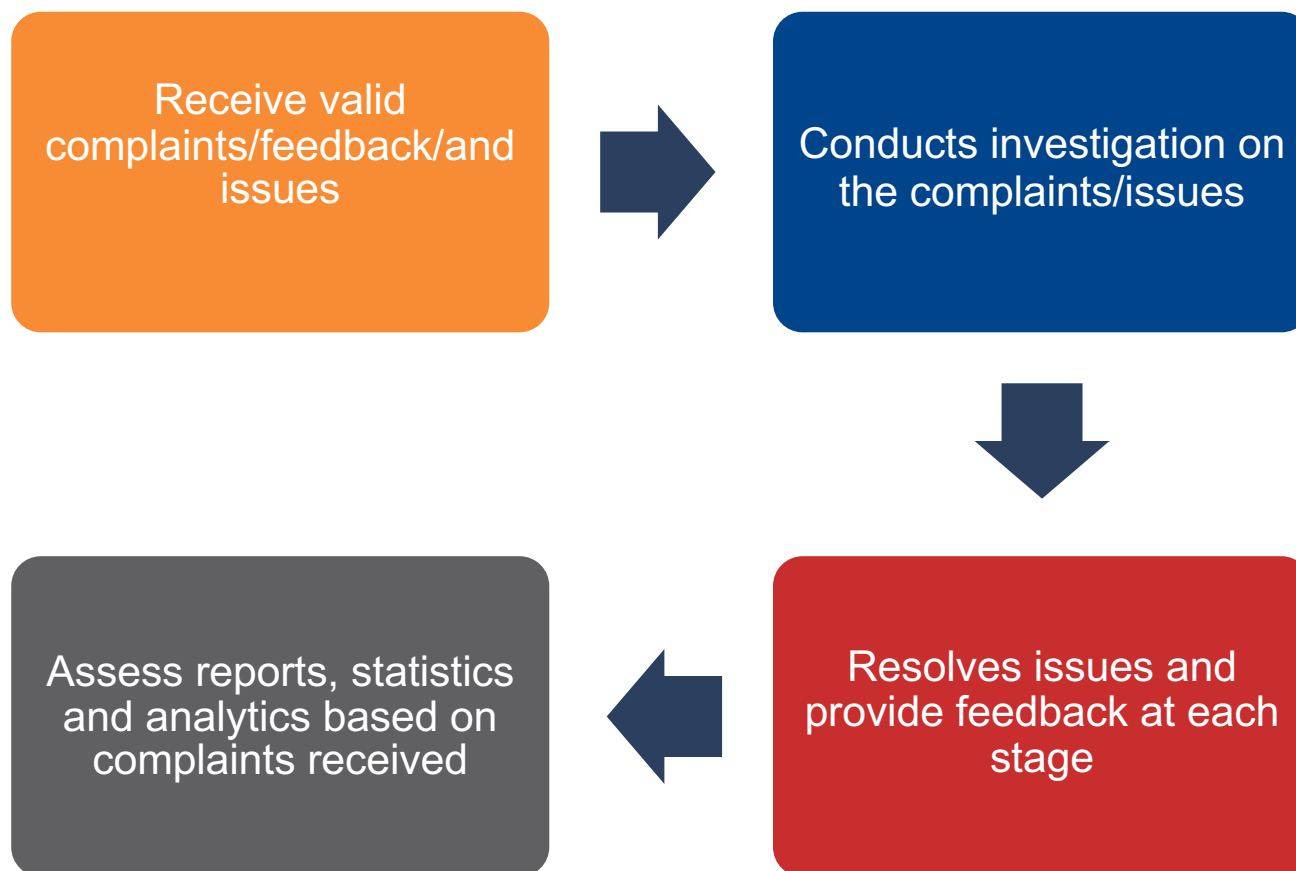
Practical Case Management Example (PortCallAssist)

Step 1.1: Receive Valid Complaints/Feedback/Issues 🔥 ◎

Once logged into the PortCallAssist System, select "Manage Incoming Complaints"

Step 1.2: Receive Valid Complaints/Feedback/Issues 🔥 ◎

All complaints referred to your agency will be listed. Read the information submitted for the report/case you would like to address, and click "Update" to take action:

PortCallAssist
Online Port Call Assistance
Administrator

List of Complaints.

Home | Logout

	ID	Complaint Header	Shipping Company	Arrival Seaport/Terminal/Jetty	Complaint Detail	Complainant	Date Submitted	Action	Refered To	Update
☐	1	Demand For Bribe	Pretend Co.	Tin Can	At 18:04, an official from X agency demanded a bribe and threatened delays if it was not paid.	Captain Nautics	29-05-2022	No Action	Nil	Update
☐	2	INFORMATION ON THIS CASE IS REDACTED ; INFORMATION ON THIS CASE IS REDACTED								Update

Step 2: Conduct an Investigation

Take the necessary steps to conduct an investigation, making inquiries and referring to the SOPs and consequence management framework as a guide.

PortCallAssist
Online Port Call Assistance
Administrator

Complaint Detail for Captain Nautics   Print Page | Update | View List of Complaints | Home | Logout

Complaint validated with reference code **LMCA1652**

Vessel Detail:	Vessel Name:
Complainant Name:	Captain [Nautics]
Phone Number :	+234 909 123 4567
Email:	example@gmail.com
Agency/Operator Group/Category:	Government
Agency/Operator:	X Agency
Complaint Header/Type:	Demand for Bribe
Complaint Details:	At 18:04, an official from X agency demanded a bribe and threatened delays if not paid.
Previous Comments:	
Status Message:	Your complaint has been received and filed by MACN. Your case file number is
Comment:	
Action :	No Action

Step 2: Conduct an Investigation

Continually update the status of the case by selecting the most appropriate description from the drop-down menu.

Step 3: Resolve Issues and Provide Feedback at each Stage 🔥 ◎

Update the case by providing comments, and close the case by selecting the most appropriate description from the drop-down menu (refer, close, or withdraw the case).

Principles to Guide Case Administration

| CONFIDENTIALITY	OBJECTIVITY	TRUST
Case details such as names and contact details of the reporters, Case ID numbers, vessel names, and subject of the complaint must remain confidential. Ensure data is safe and only shared with those who are directly involved with the case, even within the handling department.	Case tracking, notes, updates, and sharing resolution rationale helps the process feel fair and transparent.	Users will know that they will not face consequences for being honest (non-retaliation) and will feel their concerns were impartially treated.

Root Cause Analysis (RCA)

Root cause: The core issue or "highest-level cause" that ultimately leads to a problem. The true "factor that caused a nonconformance [noncompliance]." The very first "domino".

RCA: Approaches, tools, and techniques to identify and permanently address a root cause.

An RCA alone will not produce any "results." It is through continuous process improvement using the insights from the analysis that results are obtained.
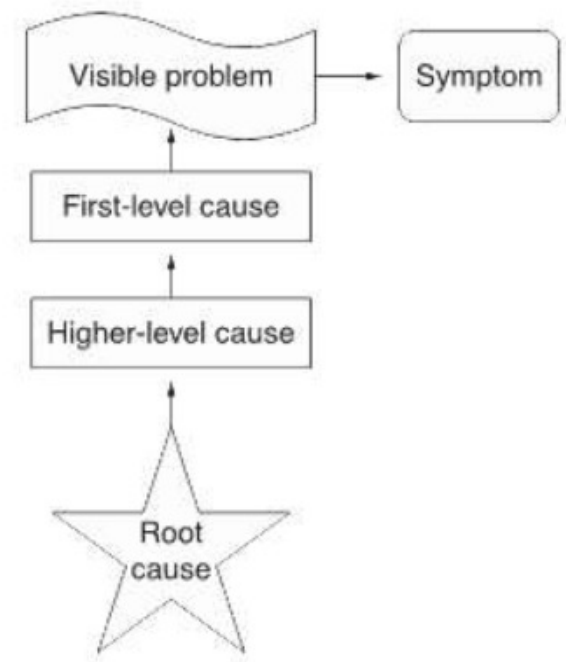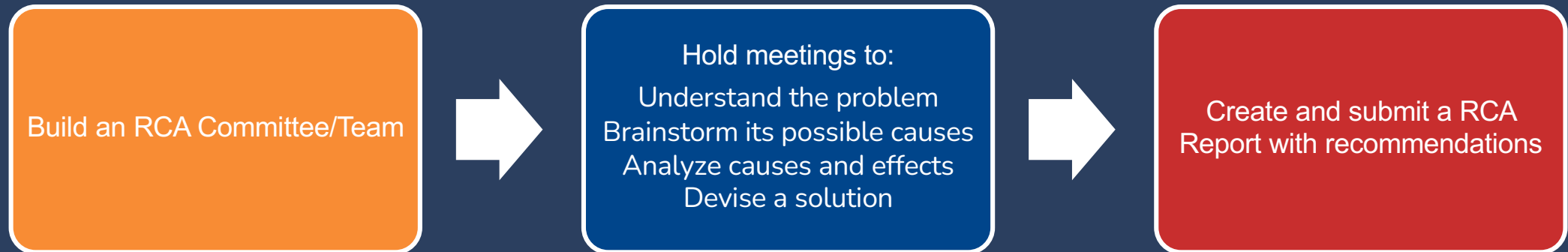
Approaches to Root Cause Analysis

1. Cause-and-Effect analysis: Establishes timeline and contributing factors; Best used for major, single-event problems; Can use tree diagrams
2. Change analysis: Explains why performance has changed significantly
3. Barrier analysis: Explores the reasons why a control/set of controls failed
4. Kepner-Tregoe Problem Solving and Decision Making Approach:
   1. Situation analysis
   2. Problem analysis
   3. Solution analysis
   4. Potential problem analysis

Conducting a Root Cause Analysis

| Build an RCA Committee/Team | → | Hold meetings to:

Understand the problem
Brainstorm its possible causes
Analyze causes and effects
Devise a solution | → | Create and submit a RCA Report with recommendations |

After the Root Cause Analysis, officers should investigate if there is a gap that needs to be addressed. This process is part of continuous system improvement, and the continuous updating of the guidelines on offenses (the CMF).

Developing a Consequence Management Framework

What Is a Consequence Management Framework?

"An internal system or process that outlines an organisation's approach to managing compliance and mitigating compliance risk."

Australian Standard on Compliance Programs (2014)

Implementing a CMF

1 — Establish and communicate a clear outline of key responsibilities and roles

2 — Identify support and training needs for employees and assessment strategy

3 — Define and communicate positive and negative incentives for compliance and non-compliance (eg. Offenses Template)

4 — Levy "rewards" for compliant behaviour, and manage non-compliance with expected behaviours

Practical Example: ICPC CMF

The ICPC has created a Consequence Management Framework to govern various bodies, sectors, and groups. Their CMF model strategy begins by identifying the target audience, considering the underlying causes or "pain points" that motivate someone toward corrupt behavior, addressing these pain points by providing "incentives and drivers" toward the right action, and identifying the "retarders" that could stunt adoption of standards or uptake of the incentives. See an example of the model in action below:

Strategy

Generic Pain Points	Generic Incentives	Generic Drivers	Generic Retarders
Due to poor salaries, wages, conditions of service etc., officers may prioritize 'survival' over ethics and integrity	Make adherence to standards an integral component of considerations for promotion and advancement in the forces	Agencies should require compliance with SOPs and the NPPM from officers, rank and file	SOP and NPPM compliance must be enforceable otherwise personnel will largely ignore the call to adopt it
Many officers owe their advancement to political elites who 'sponsored' their emergence and therefore they tend to act in those private interests not public interest	Certified SOP and NPPM compliance should be demanded from all personnel and enforced	Implementation of Asset Declaration system, Implementation of whistle blowing policy, Implementation of non-conviction-based asset forfeiture	No consequences for non-compliance
Justice is often meted out in the case of breaches of ethics and integrity only to those who are out of favour and so loyalty to the top matters more.	Rapid implementation of a consequence management framework	Consequences are put in place to ensure compliance with processes and procedures	Non-implementation of Asset Declaration system, Non-Implementation of consequence management system

CMF Component: Offenses Template

An Offenses Template standardizes the consequence for an infraction or deviance from the standards that has been committed. Example below:

Nature of Offense	1st Offense Response	2nd Offense Response	3rd Offense Response	Remarks
Tardiness to joint boarding process				
Failure to provide adequate identification prior to joint boarding process				
Unprofessional conduct				
Negligent conduct, or acting without personal responsibility				
Acting without integrity				

Key CMF Responses

1. All incidents must be remediated
2. Prevent recurrence and ensure the aggrieved party doesn't suffer loss, inconvenience or damage
3. Where failure was caused by (or recurred because of) dishonesty, inefficiency or lack of care or competence, indifference or deliberation, consider adding administrative responses as well.

Establish a Hierarchy of Remedial Responses

1. Training on SOPs and NPPM
2. Process Reviews to revise SOPs and NPPM
3. Additional Supervision by Compliance
4. A formal written apology from Agency
5. Compensation/Refund
6. Query, Response, Written warning
7. A Formal Agency Response/Memo

Establish a Hierarchy of Administrative Responses

1. Formal Written Apology
2. Independent review
3. Performance management
4. Notification of the PSTT for onward referral to ICPC or DSS etc.
5. Whitelisting or Blacklisting
6. Removal of any incentives afforded to individual or group
7. Suspension, variation or terms of service or termination

Communicating Resolution

- Use official channels
- Use agency's standard language conventions

Recall, effective communication must be:

Clear

Credible

Consistent

Evaluating Non-Compliance

Compliance Management & The Journey So Far...

01 DEFINE

- Assess Risks
- Align Policies & Procedures to Risks
- Define Risk Profile
- Map Risks to roles & functions

02 PREVENT

- "Tone at the Top" (Political Will)
- Training & Education on Policy
- Facilitated Workshops
- Communication

03 DETECT & MONITOR

- Controls for Rapid Detection
- Stakeholder Compliance Certification
- Self-Reporting Channels
- Compliance auditing & Monitoring

05 EVALUATE

- Metrics & Benchmarks
- Policies, Practices & Procedures
- Reports & Actions
- System Improvements

04 RESPOND

- Case identification, investigation & closure
- Redress - Corrective Actions including sanctions (CMF)
- Root Cause Analysis
- Communication of Resolution

Ethics & Integrity Policy (center)

01 / 02 / 03 / 04 / 05

The Compliance Solution Landscape

Vessel Captains and Agents — 1

Ports Officials — 2

Standard Operating Procedures (SOPs) — 3

Local Help Desk Team — 4
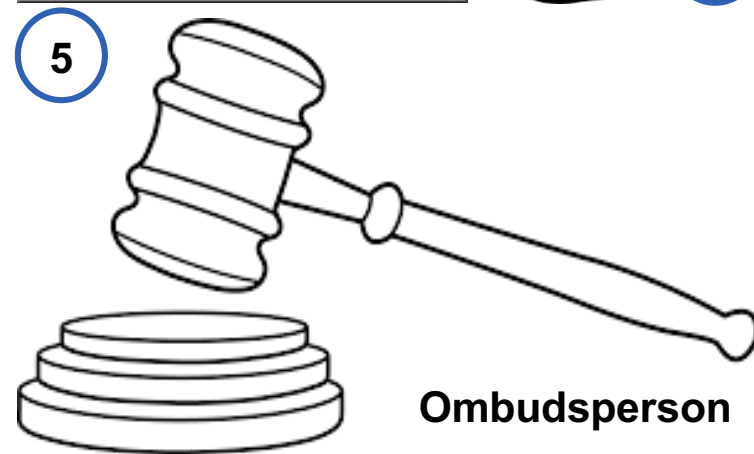
Ombudsperson — 5

GRM — 6

Accountability — 7

Leadership Moment (04)

The Moralist Officer

- During "Operation Free the Port Corridors", Officer Asabe was swept up by the DSS officers involved in the operation along with some of her colleagues. She was confident nothing would happen to her since she never shares money when they are sharing as her religion frowns at it. She is distraught to hear that as head of the patrol team, she is responsible for the behaviour of the men under her command and the sums extorted from the trucks, and her non-participation in the loot was not a defence.
- After a few days of assisting the Port Standing Task Team (PSTT) with their enquiries and signing an undertaking, Asabe is let off with a warning. Asabe wants to ensure she is never in such an embarrassing situation again. What should she do?

The Moralist Officer – Your Choices

a) She needs to adopt firmer leadership since, to be ethical, she has to not only ensure she does the right thing but that those under her command also comply and do the right things. The ethical track record needs to be clear.

b) She should start a campaign within the force against the PSTT because they didn't treat her well at all.

c) She should let it slide since there is not much that one officer can do to change the system, one cannot come and kill herself.

STAKEHOLDERS
1. Officers in Officer Asabe's Unit
2. The PSTT Members
3. Members of the Maritime Truckers Associations

Moralists value integrity, and are against corruption in their own lives; however, their integrity is a private thing. They do not rock the boat, and are not active in helping to build integrity systems

Summary of Key Points

1. Reports & Actions
2. Metrics & Benchmarks – GPIP & The Nigeria Port Integrity Index
3. Policies, Practices & Procedures – Updating SOPs & NPPM
4. System Improvements

Case Management (Pt. 2)

Establish clear expectations for behaviour	Detection of SOP breaches and complaints	Response and control of infractions and non-compliance
Honest and accurate documentation and feedback	Assessment of the detection and response efficiency of the agency	Analysis on how to build on past successes and learn from previous challenges.

Port Service Support Portal (PSSP)

Complaints Monitoring Reporting

Internal Complaints Unit and HelpDesk Cases

Case Number

Investigation Status

Progress Updates (Case Tracking Notes)

Resolution Rationale
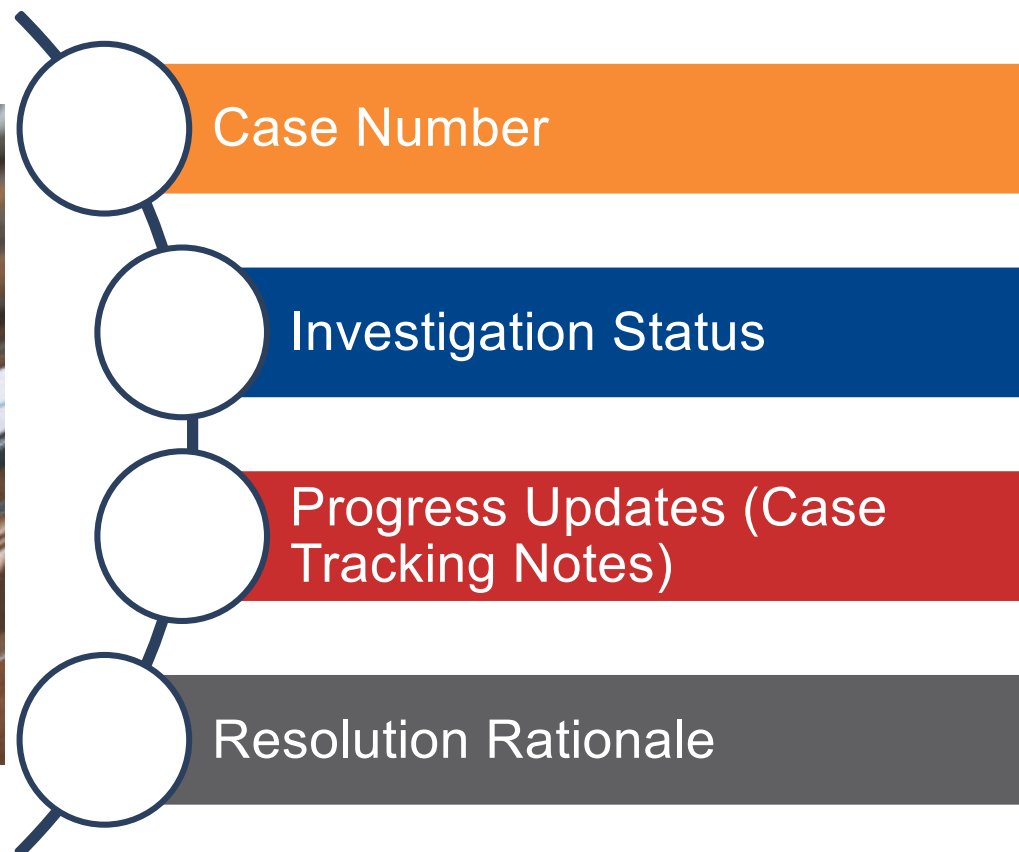
Data Analysis: Trends and Patterns

The table below features a few examples to identify trends and patterns in gathered data.

Assessment	Remarks
How long do responses usually take?	
How long does an investigation of bribery take on average?	
How long does a resolution of a breach in operations procedure take?	
What are the most common infractions?	
What times/where do specific infractions take place?	

Benchmarks and Comparisons

Benchmarking is the practice of comparing business processes and performance indicators to top industry performers and best practices from other companies. Dimensions typically measured are quality, time and cost.

Identifying top-performing ports	Understanding why they perform better than others	Determining what conditions and practices from top-performing ports can be recreated in less successful ports.

Data Analysis: Benchmarks and Comparisons

The table below features a few examples of how to use benchmarks and comparisons to assess port operations, efficiency, and integrity.

Assessment	Remarks
What is the performance expectation and how does the reality compare?	
How does the specific agency compare with others within the port?	
How does the specific agency compare with its counterpart agencies in other Nigerian and international ports?	
What is the cause for the differences ?	

MACN Global Port Integrity Platform (GPIP)

MACN's GPIP tool is exceptionally helpful to conduct benchmarks and comparative studies. Using a decade of data, GPIP standardizes and measures global port integrity against corruption risks at the port level.

Learn more at: https://macn.dk/macn-incident-data-and-global-port-integrity-platform-gpip/
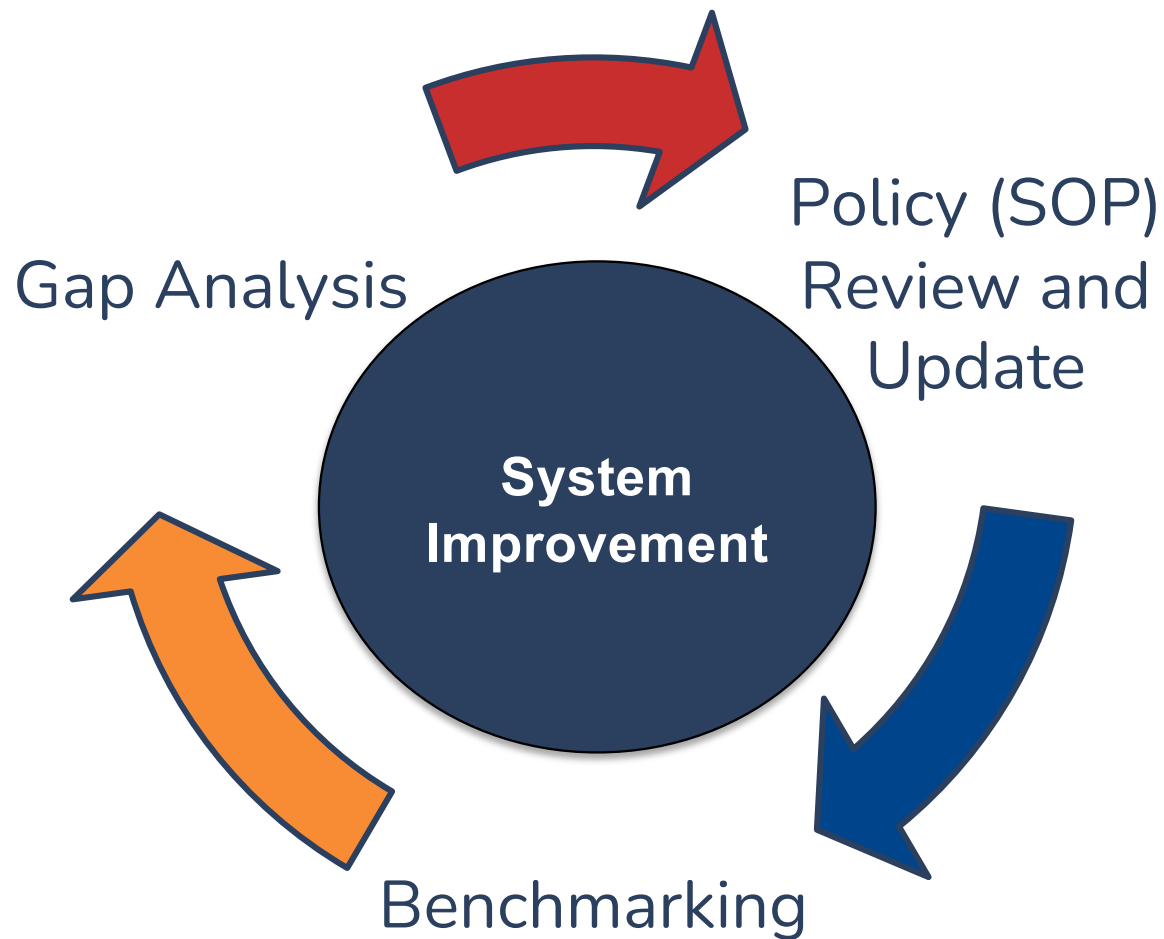
Drawing Conclusions

We perform data analysis in order to draw evidence-based conclusions, prioritizing recommendations and actionable plans for improvement of policies, practices & procedures in the NPPM and SOPs.

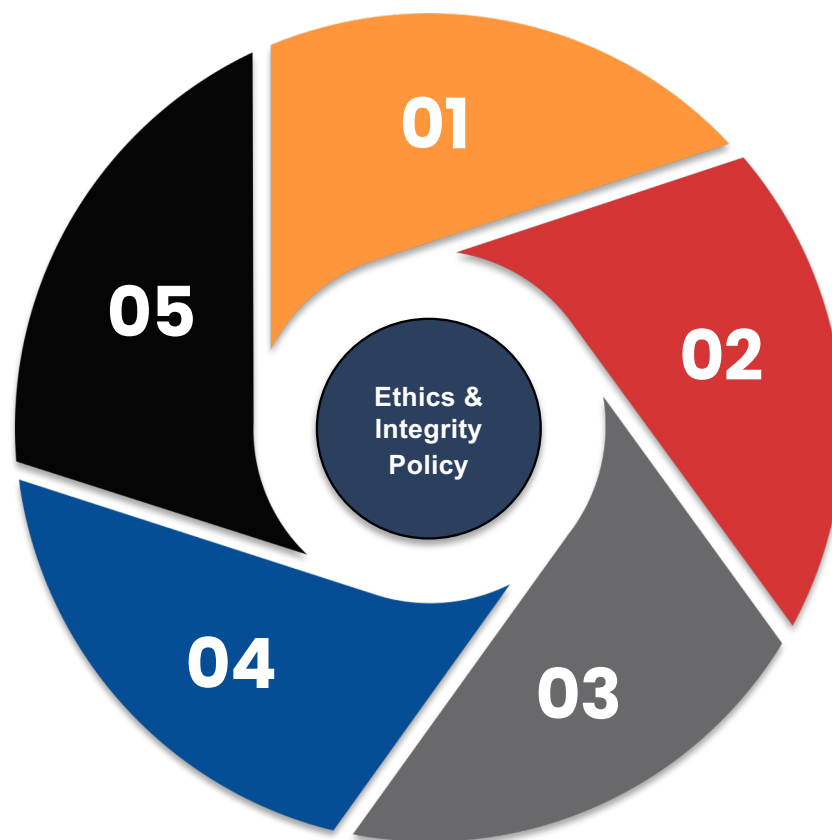# The Cyclical Nature of System Improvement

Learning Pillar

Feedback evaluation is crucial to know how to improve efficiency and transparency at the ports. Through feedback, top-performing ports can be identified, and low-scoring ports are able to implement detailed, evidence-based, actionable plans for improvement. Through improved agency response rates and increased satisfaction of port users, Nigerian ports will become competitive in the global market.

Defining Risk of Non-Compliance

Compliance Management & The Journey So Far…

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Ethics & Integrity Policy

01 02 03 04 05

http://www.compliancebuilding.com/2009/02/25/the-2008-lrn-ethics-and-compliance-risk-management-practices-report/

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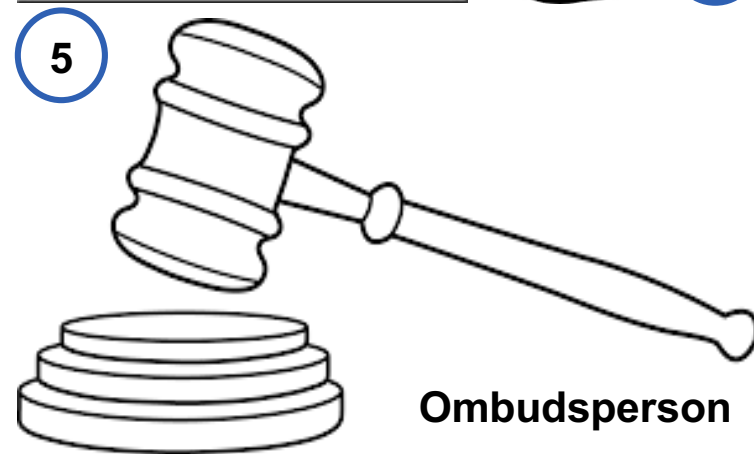
Local Help Desk Team (4)

Ombudsperson (5)

GRM (6)

Accountability (7)

Leadership Moment (05)

The Principled Officer

- ACG Cynthia is an experienced customs officer. She is often required to lead the joint inspection at the cargo terminal. She is very strict and does not allow officers and men of any formation to take more than one item as a sample from a container with homogeneous goods. She tracks the time taken to inspect a container and the overall number of containers inspected in a day. She encourages speed, accuracy and professionalism. Naturally, she recognises the compliant officers and disciplines the non-compliant. The opinion is divided amongst rank and file as to whether or not she is nice, but consignees and agents are happy when she is on duty.
- ACG Cynthia has been passed up for promotion twice now. What should she do?

The Principled Officer – Your Choices

a) ACG Cynthia should relax her principles and fall in line if she wants to be promoted.

b) ACG Cynthia should continue working according to her principles, even if no one recognises her.

c) ACG Cynthia should try to earn money from Consignees and Agents since they like her.

STAKEHOLDERS
1. CG Customs
2. PSTT National Coordinator
3. Other Senior Customs Officers
4. Consignees and their Agents

The **Principled** value integrity and transparency. They not only live by anti-corruption principles, they also do what they can to encourage others and create systems of transparency

Summary of Key Points

1. Re-assess Risks
2. Align Policies, Practices & Procedures, SOPs & NPPM to Risks
3. Define Risk Profile
4. Map Risks to roles and functions

The Environment: Stakeholders

- Terminal Operators
- NDLEA
- Nigerian Immigration Services
- Nigerian Customs Service
- Nigerian Ports Authority
- Nigerian Shippers' Council
- Truckers and Truckers' Associations
- Freight Forwarders ANCLA
- State Security Services
- Federal Road Safety Corps
- NAFDAC
- NIMASA
- Port Health Services
- Port Quarantine Services
- Private Businesses

The Environment: Personas

Individuals have their own "Integrity Personas" that characterise their attitude/affinity for corruption. They are:

- **Rebels** live by their own rules, disregarding integrity and anti-corruption standards
- **Opportunists** take advantage of a corrupt system for personal gain
- **Survivalists** feel disempowered by the corrupt practices of the country and thus succumb to such practices to get by
- **Moralists** value integrity, and are against corruption in their own lives; however, their integrity is a private thing. They do not rock the boat, and are not active in helping to build anti-corrupt systems
- The **Principled** value integrity and transparency. They not only live by anti-corruption principles, they also do what they can to encourage others and create systems of transparency

Least integrity

| REBEL |
| OPPORTUNIST |
| SURVIVALIST |
| MORALIST |
| PRINCIPLED |

Most integrity
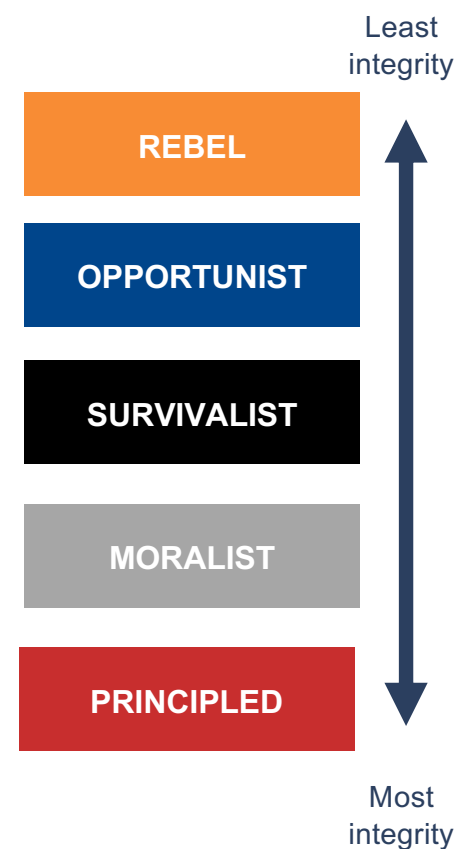
Types of Risk: Qualitative

Corruption Risk - The risk that institutional vulnerabilities in a system will result in corrupt behaviour such as bribery, extortion, nepotism, undue influence, etc.

Other types of risks include:
- Strategic Risk
- Compliance/Regulatory Risk
- Operational Risk
- Financial Risk

Types of Risk: Quantitative

Inherent Risk - refers to the risks inherent in an organisation before risk controls have been put in place

Control Risk - The risk that relevant internal controls created to address risks do not exist or are not designed or operating effectively

Detection Risk - The risk that and infringement of SOPs are not detected

Residual Risk - This is the risk remaining after efforts have been made to reduce the inherent risk.
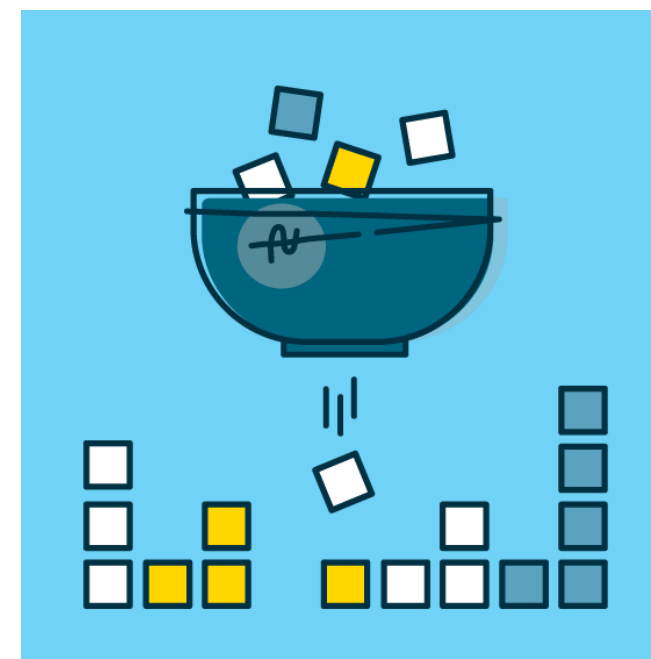
Corruption Risk Profile

Corruption risks relate to all kinds of risks (both inherent and control risks) in an organisation's activities that leave it susceptible to fraud, bribery, gift seeking, nepotism, tribalism, and other forms of corrupt behaviour.

A risk profile is a quantitative analysis of the types of threats an organization faces.

The goal of a corruption risk profile is to provide an objective understanding of corruption risks by assigning numerical values to variables representing the different types of threats and the dangers they pose.

Risks can be identified though using Gap Analysis Methodology. This methodology involves identifying weaknesses in agency operations which may present opportunities for corruption to occur. The "Think Like a Thief" exercise can be used, where one places oneself in the shoes of someone who would like to subvert the system.

Corruption Risk Assessr

The starting point for anti-corruption reform is conducting a corruption risk assessment to understand where the risks of corruption lie. According to Transparency International," [A] Corruption risk assessment is a (diagnostic) tool which seeks to identify weaknesses within a system which may present opportunities for corruption to occur. It differs from many other corruption assessment tools in that it focuses on the potential for - rather than the perception, existence or extent of - corruption."

A port sector CRA was published in 2014; the results of this assessment have formed the backbone of all interventions for port reform so far. You can find the full CRA on the TUGAR website at the following link: http://tugar.org.ng//wp-content/uploads/2016/01/Report-of-Corruption-Risk-Assessment-in-the-Ports-Sector.pdf
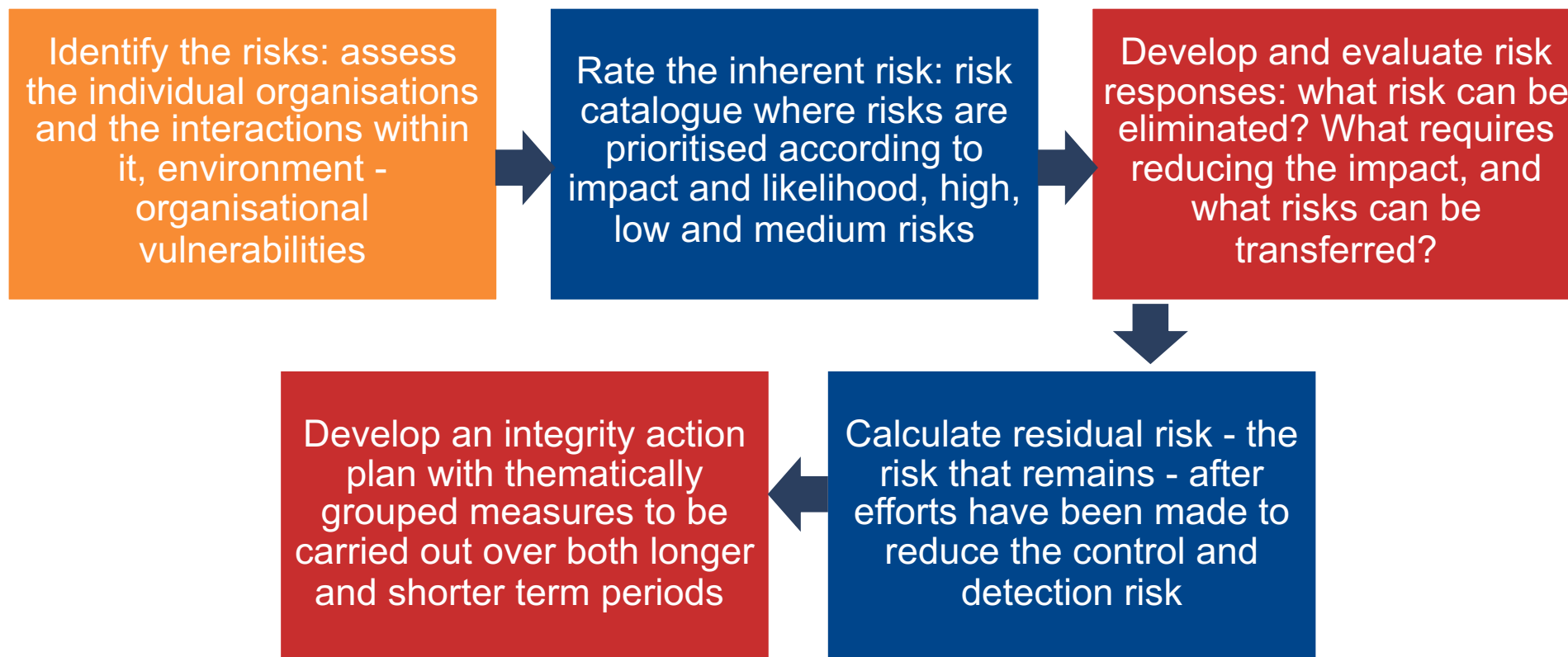
REPORT OF CORRUPTION RISK ASSESSMENT IN THE PORTS SECTOR IN NIGERIA

Designing and Conducting a CRA

Identify the risks: assess the individual organisations and the interactions within it, environment - organisational vulnerabilities

→

Rate the inherent risk: risk catalogue where risks are prioritised according to impact and likelihood, high, low and medium risks

→

Develop and evaluate risk responses: what risk can be eliminated? What requires reducing the impact, and what risks can be transferred?

↓

Develop an integrity action plan with thematically grouped measures to be carried out over both longer and shorter term periods

←

Calculate residual risk - the risk that remains - after efforts have been made to reduce the control and detection risk

Risk Response and Residual Risk

After identifying risks, they must be mapped to specific the specific positions, procedures, or processes that take place at the ports. Mapping risks enables identification of the controls and responses needed to mitigate the risk, and enables the development of an Integrity Plan of activities, outputs, and measures to embed compliance during operations.

Continual re-assessment is needed to identify new risks and minimize residual risks.

Integrity Planning

Despite a successful top-level integrity plan for the ports, the logic of risk assessments requires that participating organisations within the sector also conduct their own integrity planning.
Their plan will specifically correspond to the risks identified for their units. The 2014 CRA contains the Integrity Plan for the port sector. You can find the full CRA, including the Integrity Plan, on the TUGAR website at the following link:
http://tugar.org.ng//wp-content/uploads/2016/01/Report-of-Corruption-Risk-Assessment-in-the-Ports-Sector.pdf

Thank you

The Convention on Business Integrity
in partnership with the Maritime Anti-Corruption Network