

## THE ROLE OF ESTATE SURVEYORS AND VALUERS IN LIFESTYLE AUDIT IN NIGERIA: CHALLENGES AND SOLUTION

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### ABSTRACT

*Corruption is a major problem faced by countries globally, and it is common among political and public office holders in Nigeria. In fighting this menace, asset declaration in lifestyle audit has been globally accepted as accountability tools in public service. Although, the role of estate surveyors and valuers in asset declaration is becoming prominent in recent times, there are still challenges to overcome. This exploratory study examines the concept of asset declaration within lifestyle audits and its application in Nigeria. It brings to focus the notable non-involvement of Estate Surveyors and Valuers in this process, highlighting the consequential impact on governance, transparency and accountability. Findings reveal loopholes and the ineffectiveness of the current process being adopted by relevant government agencies. The study recommends the adoption of "Asset Declaration and Valuation" (ADV) as a statutory valuation being a viable strategy for winning the anti-corruption war in the Nigerian public sector.*

**Keywords:** *Asset declaration, Asset valuation, Corruption, Estate Surveyors and Valuers, Lifestyle audit.*

### 1.1 INTRODUCTION

Corruption still remains one of the major problems faced by governments all over the world most especially in developing countries like Nigeria (UNODC, 2023). While the level of entrenchment may differ from nation to nation, it is still a global menace. In Nigeria, corruption is a multifaceted challenge that has threatened the political and economic aspects of national life (Mohammed, 2013). In a bid to control this social ill, the Federal government of Nigeria established the following agencies; the Economic and Financial Crimes Commission (EFCC), the Independent Corrupt Practices and Related Offences Commission (ICPC), Code of Conduct Bureau (CCB), and the Nigerian Financial Intelligence Unit (NFIU) to engage in the war against corruption. Other reform efforts, according to Enofe *et al.* (2017), include public procurement reforms, the Integrated Payroll and Personnel Information System (IPPIS), the Treasury Single Account (TSA) and lifestyle auditing amongst other measures. However, among all these measures it may be important for the anti-corruption agencies to pay much attention to lifestyle auditing of political office holders as well as civil servants.

Lifestyle audit is a financial inquiry that values an individual's lifestyle such as assets owned, spending habits, and place of residence in relation to income (France, 2021). In a situation in which an individual's lifestyle is far beyond his or her means, it can be an indicator of corruption and could lead to forfeiture of such assets after investigation. One of the efforts of the Nigerian government through the EFCC, and ICPC is to beam a search light into the lifestyle of political office holders who are assumed to have embezzled public funds while in office with a view to benchmarking the asset declared while assuming office vis-a-vis their acquisitions while in office. Asset declaration is mandated by law and most often includes details of properties owned, financial investments, businesses, and other valuable possessions.

In essence, lifestyle audits verify the accuracy of assets declared. If there are discrepancies found between the individual's lifestyle and their declared assets, it may indicate financial misconduct and a call for further interrogations. Therefore, asset declaration in lifestyle audit will enhance the effectiveness of anti-corruption measures, providing additional checks and balances to ensure the integrity of political office holders (Ashukem, 2022).

Estate surveyors and Valuers are professionals licensed by law to carry out the valuation of properties in Nigeria. By Decree No. 24 of 1975, now CAP E. 13 LFN 2007, the Estate Surveyors and Valuers Registration Board of Nigeria (ESVARBON) was established as a regulatory body for the profession. The need for estate surveyors and valuers to get involved in asset declaration by political office holders is becoming more obvious. Among other suggestions to relevant

government authorities, the 26<sup>th</sup> and former Chairman of the Nigerian Institution of Estate Surveyors and Valuers (NIESV), Lagos State Branch, ESV Dotun Bamgbola in an interview granted to the Independent Newspapers (July 24, 2019) advised the Code of Conduct Bureau (CCB) to obtain a valuer's certification on every asset so declared.

The aim of this paper is to give an overview of the role of the Estate Surveyors and Valuers in asset declaration and valuation as an aspect of life style audit. It is also to examine the obvious challenges to their role especially in a developing country like Nigeria where transparency seems alien to the business of governance and reports can be manipulated in the corridors of power as prejudiced profiling (Anazodo et al., 2015).

## **1.2 ANTI-CORRUPTION EFFORTS IN NIGERIA**

According to Ibrahim Magu (former Head of Nigeria's anti-corruption agency, EFCC) "Corruption is probably the greatest problem facing our dear nation Nigeria" (Odunsi, 2016). There are World Bank estimations that corruption, stealing and tax fraud, including other illegal fiscal operations cost the developed and developing countries between \$1.5 and \$1.26 trillion per year, equating to more than 5% of global GDP (Paterson et al., 2019; World Bank, 2017). In 2015, a forensic audit carried out by PriceWaterhouseCoopers (PwC) showed that \$1.48 billion USD was unaccounted for in the Nigerian National Petroleum Corporation's account, as it had not been transferred to the Nigerian federation account (Amaefule & Umeaka, 2016).

Over the years, many actions have been taken by the government to curb the menace of corruption in Nigeria. According to Mohammed (2013), these initiatives includes public service reform such as monetization to curb wastage and reduction of excess personnel, public procurement reform, the establishment of anti-corruption enforcement bodies and policies. Additionally, there's the adoption of International Public Sector Accounting Standards (IPSAS) and the Government Integrated Financial Management Information System (GIFMIS), which as highlighted by Omolehinwa and Naiyeju (2015), have the potential to improve the management, recording, and reporting of government financial transactions. Also, government at various levels have put in place "the whistle blower policy" equally aimed at fighting corruption in public offices. With this policy, people can report anyone they suspect is living above his or her known income, and if it is confirmed that such person has stolen public funds, the whistle blower is entitled to some percentages of the recovered loot. The whole essence is to ensure financial responsibility, openness and accountability in public sector expenditure and revenue generation.

Despite these efforts, corruption remains a major problem in the Nigerian public sector, posing great concerns as Nigeria remains highly rated amongst countries with the most corrupt public sector (Obike, 2023). Public officers, and political office holders are potentially exposed to corruption due to the fact that they have in their custody the common wealth of the people, hence much attention has been diverted into auditing their lifestyle.

## **1.3 LIFESTYLE AUDIT OF POLITICAL OFFICE HOLDERS**

The goal of the average Nigerian youth is to get into political positions at all cost and then partake of the 'national cake', amassing great personal wealth without any commitment whatsoever to serve (Nche, 2011). To prevent corruption, countries such as Kenya, India, and the United Kingdom have provisions in their laws that support seizing assets held by public officials if they cannot prove their lawful acquisition (Katiba Institute, 2018). Similar law exists in Nigeria. In 2022, the Senate passed a bill; the Proceeds of Crime (Recovery and Management) to allow seizures, forfeitures and confiscation of items derived from unlawful activities. The law was subsequently assented to by the President. Nevertheless, if lifestyle audit is properly instituted in Nigeria laws, there will be less effort at seizures, forfeitures, and confiscations etc. which are costly and time consuming because of the legal battles that are usually involved between the government and the accused. Hence, the country must embrace the lifestyle audits.

Various methods exist for conducting lifestyle audits. These include assessing net worth and administering lifestyle questionnaires, both employed by auditors to identify public officials who may be receiving beyond their legitimate income. (Animashaun et al., 2021). The net worth approach involves comparing assets and liabilities at particular points, typically at the beginning and end of a public servant's tenure. For the Nigerian public servants, this assessment occurs every four years. Discrepancies between a public official's net worth and their known legitimate income suggest that additional assets may have been unlawfully acquired. This potentially suggests corruption unless justified otherwise (France, 2021).

The income method, through the administration of lifestyle questionnaires, provides insights into potentially concealed income. Examining a suspect's consumer index can help uncover the cause of any abrupt change in lifestyle. The consumer index incorporates the spouse's earnings, declared family assets, and average monthly family expenditures. If it becomes obvious that the combined income cannot feasibly support the lifestyle, suspicions may arise that the individual is living beyond their means, thereby prompting presumptions of corruption (Koigi, 2016).

There are established statutory bodies responsible for lifestyle audits in Nigeria. They include the Code of Conduct Bureau (CCB), set up by Code of Conduct Bureau and Tribunal Act, 2010; the Economic and Financial Crimes Commission (EFCC) established by the Economic and Financial Crimes Commission Act, 2004, and the income tax reporting framework administered by the Federal Inland Revenue Service. The efficacy of the existing legislation and established statutory bodies responsible for lifestyle audits in Nigeria is not certain (Nwaodu et al., 2014). It seems that the provisions addressing lifestyle audits under the Nigerian statutes are not adequate to curb corruption and tax dodging. Also, the enforcement of such lifestyle audit verdict is hindered by the immunity granted to certain Nigerian public officials and the jurisdictional conflicts that arise in pursuance of legal actions in corruption cases. Even when the anti-corruption agencies get conviction in court against culprits, the President of the country has the constitutional power to grant pardon to such people (Nche, 2011). Such acts have been witnessed in the country in recent years. This interference from government renders all the time and resources to get conviction useless (Abu, 2022). The aftermath of this is that people see the anti-corruption fight as mere rhetoric.

Another challenge is the ineffectiveness of the verification of assets declared (Lawal, 2009). Due to the fact that technology is not adequately utilised in carrying out lifestyle audits, huge funds (usually converted to US dollars) are transferred in cash on a daily basis and this can be very difficult to trace (Duyne & Harvey, 2020). The validation of the assets of many public servants will continue to be ineffective without the deploying sophisticated technology which cannot be compromised. Animashaun et al. (2021) hinted that neither the CCB nor office of the Auditor-General have provisions for adequate training and skills in modern forensic auditing techniques. Thus, the CCB and the Auditor-General staff seem ill-equipped to detect and gather sufficient evidence regarding corruption and to effectively carry out their oversight duties and risk-based audits. According to the study, the CCB and the Code of Conduct Tribunal are also grossly short of human resources. Suggested that neither the CCB nor the office of the Auditor-General have provisions for comprehensive training and proficiency in modern forensic auditing methods. Consequently, staff members of the CCB and the Auditor-General's office appear to lack the necessary tools to identify and gather ample evidence of corruption and fulfil their oversight responsibilities and risk-based audit functions effectively. The study also reveals significant inadequacies in human resources within the CCB and the Code of Conduct Tribunal.

Numerous Nigerians and civil society groups have requested that the CCB grant access to the asset declarations of public officials, particularly those in political positions, for examination, without success (Lawal, 2009; Zekeri & David, 2020). Bodies like the Estate Surveyors and Valuers have also canvassed that there should be professional involvement in the process for

better results. This is because by law, all real estate/assets valuation matters should be referred to Estate Surveyors and valuers and there can be no real declaration of assets without proper valuation to determine the monetary worth of such assets. (Cap E13 LFN 2004 by the National Assembly (formerly decree 24 of 1975) established the statutory exclusive preserves of the profession of Estate Surveying and Valuation, alongside with section 7(1), 12(a), (b), 31(a) to (f) of its supplementary legislation (Estate Surveying and Valuation Regulations 2014) as provided for in section (18) of the original Act (Estate Surveyors & Valuers [Registration, e.t.c. Act]). The CCB's refused, based on the clause in the law that access can only be granted based on terms prescribed by the National Assembly.

#### 1.4 ECONOMIC AND FINANCIAL CRIMES IN NIGERIA THAT ARE RELATED TO REAL ESTATE

The importance of the real estate sector to everyone makes it vulnerable to corruption. Notwithstanding, it has to be jealously guarded against every form of abuse, manipulations or illegal acts from all its stakeholders, most importantly the real estate practitioners who are represented by the registered estate surveyors and valuers in Nigeria. Section 46 of the EFCC Act 2004 itemizes the offences that could be related to the real estate sector:

- i. **Embezzlement:** Embezzlement occurs when an estate surveyor and valuer steals client's funds be it rent, service charge or any other funds in his or her care.
- ii. **Money laundering:** This can be in the form of purchasing properties directly or by proxy on behalf of client with illegal funds. The current chairman of EFCC, Abdul-Rasheed Bawa recently mentioned that most of the residential estates in FCT-Abuja were developed with proceeds of money laundering.
- iii. **Foreign Exchange Malpractice:** As regards this, it includes the sale or letting of property in dollar as against the policy of the Central Bank of Nigeria. It also includes any other real estate transactions carried out in dollar currency in Nigeria.
- iv. **Tax Evasion:** An act of jumping tax payment to the government, be it personal or company tax.
- v. **Any form of Corrupt Malpractices:** This has to do with "jerking-up" of sales or purchase price of property, giving bribe to get briefs, cloning of documents, cheating of professional colleagues with respect to fee sharing, undervaluation/overvaluation to favour client, issuance of dud cheque, asset misappropriation, false accounting etc.

#### 1.5 ASSET DECLARATION AND VALUATION: THE NITTY-GRITTY

Declaring wealth (assets) has been embraced worldwide as a means of ensuring accountability in public service (World Bank, 2013). At the global level, Article 8 of the United Nations Convention Against Corruption (UNCAC) insist that all member states create systems and frameworks that mandate public officials to disclose "to the appropriate authorities their other activities, employment, investments, wealth, and significant gifts or benefits (Vlassis, 2017). This is the global legal framework that effectively makes wealth declaration a requirement in the quest for accountability in the public sector. Article-7 of the African Union Convention on Preventing and Combating Corruption (AUCPCC) compels member states to insist that all appointed public officials declare their assets on assumption, during, and after their term of office in the public service, in order to combat diverse corrupt practices in the public service.

Studies have shown that levels of corruption are perceived to be lower in countries where there are frameworks for disclosure of wealth and assets with subsequent verification and public access to the declarations unlike what obtains in Nigeria (Ngumbi et al, 2020; Ogada, 2021). By monitoring and verifying the declared assets, anti-corruption agencies can pick oddities and examine them against the declarant's legitimate income. Some countries that have made great progress in verification of declared assets, and have as a result adopted lifestyle audits include



Rwanda, the United States of America, Ukraine and Hong Kong. Conversely, African countries like Kenya, Uganda, Cameroon, Ghana and Angola have not encouraged access to declared assets, and this has remained a hindrance to pursuing accountability in asset disclosure systems. One of the strategies for discouraging corruption and the possession of unexplained wealth is Asset Forfeiture (Shihanya & Ngumbi, 2020). Unexplained assets can be defined as ownings' that do not correspond with the person's legitimately known sources of income, and which were gotten about the time the person was suspected of corruption or economic crime.

In Nigeria, Section 3c of the Third schedule in the 1999 constitution stipulates that every public officer must declare his or her assets and such details kept in custody of the CCB and made available to public under terms and conditions specified by the National Assembly. While one aspect of the CCB's role is to address complaints regarding non-compliance, ensure ethical governance by investigating allegations thoroughly and, redirecting cases to the Code of Conduct Tribunal for resolution, it is obvious that there cannot be complaints over what is not made public. The current system of asset declaration in Nigeria seems to be perceived as faulty and many have canvassed for an amendment that will establish that the declared assets are made public (*Thisday*, 1<sup>st</sup> May 2023). A situation where a public officer fills an "asset declaration form" from the comfort of their home, listing both current and anticipated assets with self-assigned values, would lack authenticity and definitely be deceptive.

The Code of Conduct Bureau (CCB) has also been engaging the services of registered estate surveyors and valuers to play their role assets declaration despite the fact that their involvement will bring improvement to the process, especially in curbing the wrong asset pricing (NIESV, 2019). In the wake of the controversy surrounding the authenticity of some assets declared by the political elites and public officers, the 23<sup>rd</sup> National President of NIESV, Sir Rowland Abonta; Chairman - Africa region, International Real Estate Federation (FIABCI), Chudi Ubosi; Chairman, Nigeria Chapter, Royal Institution of Surveyors (RICS), Gbenga Ismail; Casmir Anyanwu, and Olufemi Oyedele, all highly experienced estate surveyors and valuers submitted that non-engagement with estate surveyors and valuers by the CCB was an injustice to the nation (NIESV, 2019).

Ideally, the estate surveyors and valuers by virtue of the Decree 24 of 1975, now Estate Surveyors and Valuers Registration Act, Cap E13, LFN 2004 which charged the registered valuers with the responsibility for pricing all assets, should be called upon first of all to verify that the declared assets exist, and then carry out the valuation. This must be backed up by a valuation certificate from a registered estate surveyor and valuer. Also, these assets are re-verified after their term in office. This will ensure neutrality and independence of opinion.

### **1.6 CHALLENGES CONFRONTING ESTATE SURVEYORS AND VALUERS IN PUBLIC OFFICERS ASSETS DECLARATION/VALUATION**

According to the interview granted the Guardian Newspaper on the 22<sup>nd</sup> July, 2019, the 23<sup>rd</sup> National President (NIESV) mentioned that every effort made in the last six years by the Nigerian Institution of Estate Surveyors and Valuers to play her statutory role as valuers in the declaration/valuation process even on pro-bono basis was turned down by the government through the CCB. Within the present situation, many challenges face the valuers, being part and parcel of the Nigerian society. The common use of non-professionals in determining the monetary worth of assets continues to be disheartening. The fear is that the situation may not be corrected in the nearest future because the public office holders that should legislate against it may currently be the major beneficiary of the illegality. Consequently, the whole process defeats the purpose of the asset declaration/valuation and what obtains is just to fulfil all righteousness.

Insincerity as well as ignorance of what valuation entails on the part of public office holders is a major factor contributing to the under/over-valuation of the monetary worth of their assets when asked to do their declaration by themselves. Although some may engage the services of ESVs

personally to carry out such valuation for them but what they declare in their assets declaration form may not reflect the opinion of value of the valuers because they are not mandated legally to do so. To guard against this, such valuation must be backed by relevant law to make the engagement and the opinion of value of ESVs mandatory for assets declaration exercise.

All said, legalizing the involvement of estate surveyors and valuers in asset declaration exercise may be good for the country but it is certainly not a panacea to the fight against corruption neither will it land a permanent blow to corruption in Nigeria because the profession has its own peculiar challenges. One of such challenges is client influence on estate surveyors and valuers. In valuing the declared assets, the estate surveyor and valuer may experience pressure from the powers that be to look away and reduce the net worth of the assets to be valued or increase it, whichever will favour the public office holder. There could be threats to the valuer's life or s/he may have to face a simpler consequence by his or her fees not being paid if the client is not satisfied with the valuation report. There may also be the challenge of favourite estate surveying and valuation firms among the staff of CCB that can be engaged directly or introduced to public office holders, if they find such firm "cooperative" and "understanding" in doing their bidding. Hence, denying other estate firms asset declaration and valuation (ADV) job from the agency. Another challenge is the issue of limited or no access during inspection visit to the asset because such property might be occupied by people that may refuse access to the valuer on the instruction of the public office holder in order to frustrate the valuer in carrying out the assessment so that the actual worth of the asset will not be known. These, among others, are the challenges that could be encountered by ESVs.

### **1.7 CONCLUSION AND RECOMMENDATIONS**

To curb the menace of corruption in Nigeria, there is need for a re-orientation of the mindset of its citizens. Public positions must be seen as a platform to serve and not to amass wealth or have a share of the proverbial "national cake". Such public enlightenment re-orientation by the government will keep honesty and accountability in the face of all public office holders. It will also create changes in the entire civil service and amongst practitioners that relate with them. Narrowing down to valuation of declared assets, the government must enforce the act that any public office holder must declare his total asset before assuming office, while he is in office and upon completion of his tenure. This act must also be amended in accordance to the Freedom of Information Act of 2011. Section 1(1) states that the public have a right to information which definitely includes assets declared by public officials. Also, the involvement of the estate surveyors and valuers must begin right from the asset declaration stage, otherwise, if there is fraud in the declaration of assets, corruption is still very much at play. One way to ensure this, is to mandate that all property acquisitions all over the country be handled by professional estate surveyors and valuers, not lawyers or any other persons who usurp the duties of estate surveyors and valuers by acting as estate agents.

Secondly, these acquisitions must immediately be registered by the professional that participated in its acquisition. This way, proper records can be kept and assets can be more easily tracked and the declaration process made more authentic. An estate surveyor and valuer should also be responsible for any subsequent actions, including valuations of such property.

Synergy will have to be created, between the government making the right laws and mandating its anti-corruption bodies to carry it out to the letter with appropriate penalties in place for non-compliance. The public must be enlightened about the various anti-corruption laws and estate surveyors and valuers working in unity to implement it. The Estate Surveyors and Valuers Registration Board of Nigeria (ESVARBON) together with NIESV must continue to push for this with the government, and equally put in place working committees to monitor the activities of its members.



The academia and practitioners must work together to bring about policies relevant to the government and supportive to the growth of the real estate surveying and valuation profession. Researches must be funded in this direction if the profession will remain relevant in national life. The officers in the land information system units in various states of the federation including the FCT should work towards developing software aimed at capturing all land within the federation with a view to curbing falsification of land titles as it presently obtains. The use of hard copy files that can get lost or be affected by fire must be digitalized with various forms of backups and cloud storage to guard against loss of information.

It will equally be a step in the right direction if both federal and state governments can adequately strengthen their “whistle blower policy” to make it more effective in reporting and fighting corrupt practices. Lastly, Asset Declaration and Valuation (ADV) should be classified as a statutory type of valuation when properly legalised. When this is done, the method and procedure to be used will be clearly stated thus erasing the ambiguity currently associated with its process.

## REFERENCES

- Abu, S. I. (2022). An appraisal of the impact of anti-corruption agencies on the development of the Nigerian economy. *Zamfara Journal of Politics and Development*, 3(1), 20-20.
- Amaefule, L. I., & Umeaka, E. C. (2016). Combating economic and financial crimes by the anti-graft agencies in Nigeria: Implications on the Nation's economic growth and development. *International Journal of Innovative Development & Policy Studies*, 4(2), 8-33.
- Anazodo, R. O., Igbokwe-Ibeto, C. J., & Nkah, B. C. (2015). Leadership, Corruption and Governance in Nigeria: Issues and Categorical Imperatives. *African Research Review (AFRREV)*, 9(2), 41-58.
- Animashaun, O., & Chitimira, H. (2021). The reliance on lifestyle audits for public officials to curb corruption and tax evasion in Nigeria. *Potchefstroom Electronic Law Journal*, 24(1).
- Ashukem, J. C. N. (2022). Assets Declaration as a Tool to Combat Corruption in Africa. In *Democratic Governance, Law, and Development in Africa: Pragmatism, Experiments, and Prospects* (553-577). Cham: Springer International Publishing.
- Duyne, P. C., & Harvey, J. H. (2020). Grand corruption in Nigeria: What can be learned from a review of cases. ACE Global Integrity, Working Paper 12. Retrieved from <https://ace.globalintegrity.org/wp-content/uploads/2021/06/grand-corruption-in-nigeria-harvey-06-2021-1-1.pdf>
- Enofe, A., Afiangbe, S., & Agha, D. (2017). Financial management reforms and corruption in Nigeria public sector. *Financial Management*, 3(7), 1-22.
- France, G. (2021). Overview of lifestyle audits as an anti-corruption tool and country examples from Africa. Transparency International Anti-Corruption Help Desk. July, 12.
- Independent (2019, July 24). CCB needs Valuation Certificate to Accept Asset' Declaration Claim. Retrieved from <https://independent.ng/ccb-needs-valuation-certificate-to-accept-assets-declaration-claims-bamgbola/>
- Katiba Institute (2018). Lifestyle audits and the Constitution. Retrieved from <https://katibainstitute.org/lifestyle-audits-and-the-constitution/>.
- Koigi, (2016). Kenya turns to lifestyle audits to tame runaway corruption. Retrieved from <https://www.fairplanet.org>
- Lawal, I.B. (2009). Public declaration of assets in Nigeria: Conflict or synergy between law and morality? *African Human Rights Law Journal*, 9(1), 224-261.
- Mohammed, U. (2013). Corruption in Nigeria: A challenge to sustainable development in the fourth republic. *European Scientific Journal*, 9(4).
- Nche, G.C. (2011). The concept of national cake in Nigerian political system: Implications for national development. *Bassey Andah Journal*, Vol. 14.
- Ngumbi E & Owiny P (2020). From Paper to Practice: Enhancing Public sector Accountability in Africa through Reform of the Wealth Declaration Regimes. Research Gate, Retrieved from [https://www.researchgate.net/publication/341380742\\_From\\_Paper\\_to\\_Practice\\_Enhancing\\_Public\\_Sector\\_Accountability\\_in\\_Africa\\_through\\_Reform\\_of\\_National\\_Wealt](https://www.researchgate.net/publication/341380742_From_Paper_to_Practice_Enhancing_Public_Sector_Accountability_in_Africa_through_Reform_of_National_Wealt)
- NIESV, (2019, July 22). Estate surveyors decry non-inclusion in assets declaration. Retrieved from <https://guardian.ng/property/estate-surveyors-decry-non-inclusion-in-assets-declaration-2/>
- Nwaodu, N., Adam, D., & Okereke, O. (2014). A review of anti-corruption wars in Nigeria. *Africa's Public Service Delivery & Performance Review*, 2(3), 153-174.
- Obike, C. A. (2022). E-Governance and Fight against Corruption in Nigeria: The Issues and Challenges.





- Odunsi, B. (2016). Abortion and the Law. In *Comparative Health Law and Policy*, pp. 197-216. Routledge.
- Ogada, A. (2021). Duplicity in Regulation and Performance of the Financial Sector in Kenya. *International Journal of Finance*, 6(1), 39-53.
- Omolehinwa, E. O., & Naiyeju, J. K. (2015). *Government accounting in Nigeria: An IPSAS approach* (1st ed.). Lagos: Punmark Nigeria Limited.
- Paterson, A. S., Changwony, F., & Miller, P. B. (2019). Accounting control, governance and anti-corruption initiatives in public sector organisations. *The British Accounting Review*, 51(5).
- Sihanya, B., & Ngumbi, E. (2020). The Viability of Lifestyle Audits as an Emerging Anti-Corruption Tool in the Public Sector: Concepts, Essentials and Prospects. *JACL*, 4:80.
- Thisday (2022, January 11). Issues in Asset Declaration." Thisday live. Retrieved from <https://www.thisdaylive.com/index.php/2022/01/11/issues-in-assets-declaration/#>
- UNODC (2023). Corruption. United Nations Office on Drugs and Crime. Retrieved from <https://www.unodc.org/nigeria/en/corruption.html>
- Vlassis, D. (2017). Article 9 of the United Nations Convention against Corruption (UNCAC): Implementation and practice. Resource material series No. 101.
- World Bank (2017). World Bank Indicators Database. "A safe and just space for humanity," Retrieved from <https://www.oxfam.org/en/research/safeand-just-space-humanity>
- Zekeril, M. & David, A.U. (2020). Asset declaration and political corruption in Nigeria: a review of literature. *Benin Journal of Social Work and Community Development*, Vol. 1, September 2020.