



ENCOMPASS^{LLC}

Big Bet On Nigeria

2018 Synthesis Report – For Public Use



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May 2019

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Acknowledgments

This evaluation was led by Lynne Franco and Zachariah Falconer-Stout, with team members Kim Norris, Lauren Else, and Indu Chelliah. Several organizations and individuals supported this effort. PlaySpread Nigeria, led by Segun Jerome, collected and compiled media monitoring data, and NOI Polling collected the national telephone survey data. PlaySpread worked with Dr. Saheed Adeyemo at the Lagos State University School of Communications to analyze investigative journalism data. For the qualitative interviews and focus groups, Atinuke Odukoya, Ejiro Otiye-Igbuzor, and Clement Ekeoba led data collection teams. Uzochukwu Amakom supported back translation of the phone survey. Pragati Godbole, Jennifer Johnson, Caroline Courtney, Mom Mentan, and Simon Hildebeitel supported various components of data analysis. Barak Hoffman and Nura Isa advised measurement design, and Michel Rousseau served as sampling statistician. Crystal Cason designed the report and Jelena Burgić Simmons edited the report.

The evaluation team gratefully acknowledges the guidance the MacArthur Foundation provided, in particular the Office of Evaluation and the On Nigeria Program Team. The team also thanks the On Nigeria Technical Assistance Partner, led by Jonathan Jones, Ghazia Aslam, Kirsten Tanifum, Atinuke Odukoya, Ejiro Otiye-Igbuzor, and Christian Idoko for their support in co-facilitating grantee meetings and facilitating access to grantee monitoring data. Above all, the team is grateful to the On Nigeria grantees who have worked tirelessly to confront corruption in Nigeria, the many respondents who took time to provide the data without which this report would not be possible, and the citizens of Nigeria who are standing up for their right to accountable governance.

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Acronyms

ACJA	Administration of Criminal Justice Act	LGA	Local government area
ACJ	Administration of Criminal Justice	MAP	Meter Asset Providers
CLEEN	Centre for Law Enforcement Education	NERC	National Electricity Regulatory Commission
CPC	Consumer Protection Council	OCDS	Open Contracting Data Standard
CSO	Civil society organization	PACAC	Presidential Advisory Committee Against Corruption
DFID	UK Department for International Development	PCD	Partnership for Child Development
DISCO	Distribution company	PTA	Parent-teacher association
EFCC	Economic and Financial Crimes Commission	SBMC	School-based management committee
FCT	Federal Capital Territory	SUBEB	State Universal Basic Education Board
FOIA	Freedom of Information Act	UBEC	Universal Basic Education Commission
GenCO	Generation company	UNODC	United Nations Office of Drugs and Crimes
HGSF	Home Grown School Feeding (Program)		

Executive Summary

On Nigeria and Its Theory of Change

Since 2015, the MacArthur Foundation’s Big Bet On Nigeria is investing in efforts to reduce corruption in Nigeria by supporting Nigerian-led endeavors that strengthen transparency, accountability, and participation. Corruption, impunity, and lack of accountability in Nigeria have far-reaching impacts on access to and quality of public services, the well-being of Nigerians, and overall development. The On Nigeria strategy builds on Jonathan Fox’s “sandwich” theory,¹ which recognizes the importance of the combination of a push from below and a squeeze from above to effect change and sustain momentum. The push from below is the “voice”—representing citizens’ actions to demand change and develop local solutions to corruption, while the squeeze from above is the “teeth”—representing the efforts of government and other high-level actors to develop and enforce laws and regulations, using incentives to discourage corruption and sanctions to punish it. The On Nigeria theory of change harnesses the “voice” of Nigerian citizens and the “teeth” of Nigerian public and private institutions, and combined with capacity building and collaboration, intends to address the problem of corruption in Nigeria.

Corruption is complex and ever-evolving, and progress toward the goal of reducing it will most certainly not be linear. Thus, the On Nigeria strategy is multilayered, including five specific areas of programming (modules) and several cross-cutting activities. Three modules operate in two exemplar sectors, **education** (Universal Basic Education Intervention Fund and the Home Grown School Feeding program) and **electricity** (electricity distribution) to demonstrate results of strengthened transparency, accountability, and service delivery citizens can see and feel in their daily lives. These sectoral modules focus on targeted geographies. Two additional modules address systems-level areas – **criminal justice** and **media and journalism**—that focus on strengthening corruption response and amplifying anticorruption efforts. Finally, a series of **cross-cutting** activities (behavior change through edutainment and faith-based organizations, among others, and elections) build on and complement the modules. Each module and the strategy overall have a theory of change that outlines how initial results will be achieved, and eventually, spread and institutionalized to national-level impact. This report presents the first synthesis of On Nigeria evaluation data covering the baseline period and early progress (2015–early 2018); these data cover the 57 grantees actively implementing grants by the end of 2017, representing a total of \$29.78 million in awarded funds. Note that currently (February 2019), the On Nigeria portfolio contains 90 grantees, totaling \$51.85 million in funding.

2018 Synthesis Report – Evaluation Framework and Data Sources

The On Nigeria evaluation and learning framework seeks to answer three overarching evaluation questions: (1) How is the MacArthur Foundation’s strategy contributing to changing transparency

¹ Fox, J. 2015. *Social Accountability: What Does the Evidence Really Say?* World Development 72 (August): 246-361.

and accountability of government and private-sector actors? (2) How is the MacArthur Foundation’s strategy contributing to changing social norms and citizens’ behaviors related to corruption? and (3) What kinds of adaptation or changes are needed in the theory of change and/or strategy to achieve better results? The framework is designed to provide specific information related to On Nigeria’s landscape, outcomes, impacts, and feedback on the strategy to assess progress and adapt the strategy as needed.

On Nigeria’s evaluation and learning framework uses a mixed-methods, before-after design to measure progress toward outcomes and impacts, and a mix of exploratory and descriptive data to answer landscape and feedback evaluation questions. The evaluation design employs seven different methods. Primary data sources include a national telephone survey, media monitoring, qualitative interviews and focus groups, and feedback workshops. Secondary data sources entail document review, grantee data, and corruption indices. While data collection, sampling, and analysis have been constructed to maximize evaluation rigor within the time and resources allocated, this evaluation is limited by three main design challenges: (1) measuring concretely and objectively changes in the level of corruption; (2) analyzing contribution in a complex system and across various geographies in Nigeria is challenging; and (3) timing of data collection in early 2018, 2 years after the start of the strategy, limits baseline data to secondary sources, which are scarce for a number of measures.

To anchor the On Nigeria story in a meaningful way in this first synthesis report, two periods of time are compared to assess momentum: the baseline period (“what was”) and the period starting with On Nigeria grants (“what is”). The election of President Buhari in early 2015 on an anticorruption platform provided one of the initial windows of opportunity for the Big Bet On Nigeria; this frames the start of the baseline period. Granting began in June 2015 and continued throughout the period covered by this report, with each module starting at different points. The start of initial granting for each module bounds the end of that module’s baseline period. Consequently, the baseline periods are specific to each module.

What are we Learning?

Universal Basic Education Intervention Fund Program

The Universal Basic Education Commission (UBEC) administers the Universal Basic Education Intervention Fund program (established in 2004) to accelerate infrastructure renewal and teacher development in public primary and junior secondary school schools; 2 percent of the federal government’s Consolidated Revenue Fund is dedicated to finance UBEC. The On Nigeria theory of change for the UBEC module focuses on increasing transparency and accountability in the UBEC Intervention Fund Program to ensure infrastructure and materials projects are completed appropriately. On Nigeria has funded 11 grantees (\$3.77 million as of 2018) in the effort to reduce corruption in this program through increased transparency and accountability, with a focus on Kaduna and Lagos states. These grants cover 3 percent of primary and junior secondary schools in Kaduna, and 1.5 percent in Lagos state, as well as efforts at the state and federal level.

During the baseline period (2015 through August–September 2016), the UBEC Intervention Fund was characterized by mismanagement, corruption, and lack of accountability, with a small group of decision makers at UBEC and State Universal Basic Education Boards (SUBEBs) determining which

projects and contractors received funds. With as much as 35 billion Naira (nearly \$100 million)² distributed across states annually, the program has been ripe for multiple forms of corruption, such as embezzlement, bribery, favoritism, and contracting fraud.

Since the start of On Nigeria granting, UBEC is showing some signs of responsiveness to civil society organizations' (CSOs') demands for information and has taken preliminary steps to put in place an Open Contracting Data Standard (OCDS), a system for transparent contracting. However, UBEC and SUBEBs are not yet providing adequate, timely data through this system or otherwise, and continue to limit access to information they have available despite open government policies. Grantees, local CSOs, and school officials appear to have increased their monitoring of and demand for transparency and accountability over the past 3 years, finding ways to circumvent the lack of an OCDS. Grantees are collaborating with each other, the media, and other stakeholders to strengthen "voice" actions and influence "teeth" actors to implement transparency and accountability practices (including the OCDS).

In schools where grantees are active in Kaduna and Lagos states, there are some emerging groups demanding UBEC resources for their children's schools. However, CSOs and parents in these states continue to be concerned that frequent delays in UBEC Intervention funding puts these funds in jeopardy of being diverted. About a third of parents nationwide reported demanding improvements in UBEC Intervention Fund goods and services, primarily by contacting school staff or parent groups. Almost half of parents feel and most school representatives perceive that corruption within the UBEC Intervention Fund hinders funding flows and delivery of goods and services.

Bureaucratic and political inertia appears to continue to hamper transparency and accountability progress within the UBEC Intervention Fund. Additionally, there is a very limited understanding of the program itself in government, schools, and civil society, which impedes demand for resources and monitoring. Despite challenges, the window of opportunity still exists for UBEC and new opportunities are emerging at federal and state levels, such as open contracting, political will in the wake of 2019 elections, and access to funding. Still, inertia for this program, potentially related to more ingrained practices, translates to slow initial changes.

Home Grown School Feeding Program

The National Home Grown School Feeding (HGFSF) Program, introduced nationally in December 2016, was a key feature of President Buhari's 2015 campaign. This program has a dual goal of providing school lunch for 5.5 million public primary school students in 2018 and supporting local agriculture through a supply chain of federal and state government officials, local farmers, aggregators, cooks, and school personnel, creating numerous opportunities for corrupt practices. On Nigeria's HGFSF theory of change focuses on building increased transparency and accountability throughout the HGFSF supply chain to create and maintain consistent, quality meal delivery for schoolchildren and effectively use public resources. On Nigeria has funded nine grantees totaling \$4.63 million in Kaduna

² The Guardian. 2017. *Nigeria: 17 States Fail to Access N16.2b UBEC Fund in 2017*.

and Ogun states, most of which began their funding in September 2017. These grants focus on 8 percent of schools in Kaduna and 9 percent of schools in Ogun.

Because the government launched the current HGSF program concurrently with On Nigeria, there are very limited baseline data. An earlier HGSF program had been initiated in 12 states and the Federal Capital Territory in 2006, but was suspended in 2008 in all states except Osun, because of funding constraints and changes in government administration. Document review of these pilot states outlines challenges with ensuring adequate monitoring and community sensitization, but it is unclear whether suspension was due to corruption or more general inefficiency.

The HGSF program has introduced multiple anticorruption measures at the federal level, including direct payments to cooks and aggregators via mobile devices, and third-party monitoring; however, more remains to be done at all levels. Local-level HGSF monitoring by parents, school-based management committees (SBMCs), school officials, and CSOs is uneven but expanding. Grantees have started to build capacity of state officials, food vendors, and community members to monitor meal delivery.

Stakeholders appear generally positive about meal quality and quantity in the target states of Kaduna and Ogun, and cite corruption-reduction practices as helping. Across all HGSF states nationwide (24 states in 2018), a majority of parents report good quantity and quality of HGSF meals their children receive, although a fifth of parents have contacted someone to demand HGSF services their children should receive. About a third of parents who have primary school children eligible for HGSF feel that there is corruption in the HGSF program; the perceived corruption levels are lower than in the UBEC and electricity modules.

As a new national-level program, the National HGSF program appears to have the political will at the federal and state levels to keep corruption from taking root. Although implementation varies by state, a combination of “teeth” efforts (i.e., accountability checks) and “voice” activities (i.e., active participation of CSOs and parents) at the federal level and in Kaduna and Ogun states has contributed to reduced risks of leakage and corruption. Local community capacity to monitor and advocate for meal delivery is slowly increasing in Kaduna and Ogun, although the effectiveness of monitoring structures varies at all levels and stakeholders’ knowledge of the program could be strengthened. There is evidence of increasing coordination across the states, between state groups and the national coordination office, and among grantees, which creates a nascent voice movement of monitors pushing for openness and accountability. Numerous active and potential corruption disruptors along the service delivery chain offer hope of further progress.

The window of opportunity for anticorruption work in HGSF remains open: There is increasing momentum in “voice” activities, even though effective “teeth” efforts depend on continuing political will and advisory committee structures vary by state. These “teeth” efforts will need to be strengthened and expanded as the National HGSF Program continues to spread.

Electricity Distribution

Nigeria's electricity sector has had a troubled history. In 2013, the Nigerian federal government attempted to resolve perennial issues of inconsistent service by privatizing the sector—selling the electricity generation companies and distribution companies (DISCOs) to private owners. The National Electricity Regulatory Commission (NERC), an independent government body, manages electricity tariffs, policies, and standards at a national level, while 11 DISCOs across Nigeria are responsible for providing electricity to customers. The On Nigeria theory of change for the electricity modules focuses on promoting transparency and accountability along the electricity distribution chain. On Nigeria has awarded six grants (\$2.3 million) to a diverse set of actors, including federal regulators, the association of DISCOs, CSOs, and business and policy analysts, with a focus on the Abuja and Benin DISCOs.

The baseline period for electricity distribution covers 2015 through the start of On Nigeria grants in February 2016. Despite privatization and subsequent heavy investment by donors, private companies, and the government of Nigeria, the World Bank estimated only 59 percent of Nigerians had access to electricity as of 2016. Major external challenges in 2016—a drop in oil prices, a recession, a currency crisis, and attacks in the Niger Delta—aggravated the Nigerian power sector's liquidity crisis, exacerbating existing operational challenges and weakening the ability to provide more reliable and fair service to customers. NERC first released its *Public Notice on Electricity Customer Rights and Obligations* in February 2016, and media monitoring data for 2016 indicate a prominence of corruption-related electricity coverage, consisting of 47 percent of reporting related to On Nigeria areas.

Efforts to increase transparency and accountability along the electricity supply chain have contributed to some initial progress, particularly in “voice” and, to a lesser extent, “teeth” outcomes. Grantee efforts have made tangible progress in improving customers' awareness of rights, mechanisms for DISCO responsiveness to complaints, regulator information sharing, and collaboration across actors. In both the Abuja and Benin DISCO catchment areas, CSOs, customers, and media are monitoring electricity distribution, and advocating for improved transparency and accountability. Through collaboration between different electricity actors, stakeholders perceive an increase in citizens' awareness of their rights and use of redress mechanisms, which in turn, contributes to increased CSO and customer demand for accountability. While NERC has introduced multiple regulations to improve DISCOs' practices, evidence of compliance and enforcement remains limited.

Despite targeted DISCOs' efforts to date, customers and CSOs perceive DISCO responsiveness to customer complaints and willingness for reform to be poor. One key anticorruption strategy to combat the potential for corruption is to remove estimated billing and increase transparency. However, Abuja and Benin DISCOs are making slow progress to ensure meters for all their customers—only 16 percent of customers in Abuja DISCO and 29 percent in Benin DISCO reported having a meter in 2018. While perceived price transparency is overall poor, metered customers are significantly more likely to view prices as transparent than customers with estimated billing, both in

the two targeted DISCOs and across Nigeria more broadly. Almost two-thirds of DISCO customers (both in target DISCOs and across Nigeria) report that other customers are tolerant of electricity sector corruption and that their DISCO is ineffective at addressing corrupt practices.

The electricity sector is complex and faces several challenges external to On Nigeria. The *Power Sector Recovery Plan*, introduced in March 2017, is not being implemented quickly and vested interests interfere with progress. DISCOs' viability—irrespective of corruption—remains problematic due to issues with power generation and transmission and DISCOs' liquidity, which is affected by a lack of cost-reflective tariffs (not yet in existence) and consumer non-payment. While the window of opportunity for On Nigeria efforts remains open, the extent to which current anticorruption efforts can effect change still depends on broader reform.

Criminal Justice

President Goodluck Jonathan signed the Administration of Criminal Justice Act (ACJA) into law in 2015, with sweeping provisions aimed at improving and harmonizing the criminal justice system across Nigeria. Although the ACJA does not explicitly address corruption in the criminal justice system, four of its essential provisions support the broader fight against corruption through criminal prosecution in the courts: (1) ensuring qualified legal practitioners, (2) reducing interlocutory appeals, (3) guaranteeing speedy trials, and (4) creating a monitoring committee to secure the appropriate implementation of the law. On Nigeria's criminal justice strategy rests on the bedrock of the federal ACJA, and seeks state-level consideration and implementation of parallel Administration of Criminal Justice (ACJ) laws and supports their implementation. On Nigeria also strives to strengthen and harmonize federal anticorruption agencies, policies, and practices and laws complementary to the ACJA. On Nigeria's portfolio includes eight criminal justice grants to seven nationally focused organizations for a total of \$7.7 million.

The baseline period for the criminal justice module covers January 2015 through June 2016 (although one grant was issued in June 2015). In 2016, prior to the beginning of the On Nigeria strategy, only six states had adopted an ACJ state law, and only the federal ACJA and Oyo state's law fully included all four essential anticorruption elements.

By mid-2018, an additional 13 states had adopted an ACJ state law and seven more states considered similar legislation. Most ACJ state laws adopted after 2015 have included many of the four essential anticorruption elements. Through mid-2018, grantee CSOs were involved in ACJA and ACJ state law advocacy and monitoring efforts, but did not focus significantly on ensuring the four essential ACJA elements for holding corrupt actors accountable were included. Grantees are putting training systems in place in legal and judicial institutions, and some states are including monitoring committees to ensure compliance with the ACJ state laws, following the ACJA model. CSOs are collaborating, especially through the Civil Society Observatory on the Administration of Criminal Justice. Implementation of and satisfaction with ACJA and similar state laws vary greatly across Nigeria, although optimism about their potential is considerable.

Anticorruption federal agencies have been enacting anticorruption laws and policies, and working to adopt and encourage effective implementation of anticorruption laws and policies that complement the ACJA's focus on strengthening the justice system more broadly; however, coordination among anticorruption agencies could be strengthened.

Despite these successes, resource constraints, including poor budgetary allocations and inadequate personnel and infrastructure for judges, police, and prisons, are slowing the pace of effective prosecution of corruption cases. The window of opportunity in the criminal justice sector continues to be open, as evidenced by the momentum of states considering and adopting an ACJ state law. However, reluctance at the state level, a lack of strong monitoring committees, and the exclusion of essential elements in some state laws hamper progress for a uniform and effective criminal justice system capable of combatting corruption.

Media and Journalism

Nigeria has a vibrant media ecosystem, including public and commercial media, and nascent but growing independent media. While the Constitution of Nigeria guarantees the rights of the press to “uphold the responsibility and accountability” of government, the media's capacity to serve as a watchdog and create a truly free press in Nigeria is still limited. On Nigeria seeks to strengthen the capacity of the media and journalists to play a stronger role in promoting accountability and facilitating transparency by creating and amplifying content related to corruption issues and anticorruption efforts, and augment collaboration between civil society and the media. On Nigeria's portfolio includes 12 nationally focused media and journalism grants; nine granted in January 2017 (\$5 million) are covered in these data. Of the nine grantees, five are independent media outlets and four are media-focused organizations that promote quality investigative journalism and free press.

The baseline period for the On Nigeria media and journalism efforts covers 2015 through January 2017. During this time, Freedom House considered Nigeria's Freedom of the Press as “partly free” and cited a number of obstacles, including instances of threats to journalists and suppression as they tried to confront those in power and expel biases. Between 2012 and 2015, the percentage of Nigerians reporting accessing news from Internet sources a few times a week or more doubled— from 15 to 31 percent. Media monitoring data for 2016 found that 13 percent (35,199) of all print and online articles (270,524) the 12 sampled media sources published focused on corruption-related issues, with 1,266 articles pertaining to corruption-related issues in sectors On Nigeria focuses on.

Evaluation data indicate that government is visibly responding to at least some of the media's corruption coverage—sometimes by addressing the issue, sometimes by skirting it. While the volume of corruption-related reporting remained similar for 2016 and 2018, its focus appears to have shifted, with more emphasis on corruption evidence, particularly from grantee media sources (especially online sources). Meanwhile, On Nigeria grantees' activities are building capacity and contributing substantially to corruption-related reporting, despite the presence of persistent financial, political, and security challenges.

Despite limited access to print and online media sources that tend to produce more corruption-related reporting and low awareness of anticorruption success stories, most Nigerians (60–70 percent) report that television, radio, newspapers, Internet, and social media are effective in covering corruption.

Collaboration between media and CSO grantees to conduct training, amplify anticorruption efforts, and report on corruption issues is beginning to bear fruit; however, it is too early to tell whether media outlets are institutionalizing investments in reporting quality and capacity. There are opportunities to strengthen this even more, especially with CSO actors from other On Nigeria modules. On Nigeria media and journalism activities are also contributing to keeping the window of opportunity open across the strategy by producing and publishing stories related to corruption that have spurred some meaningful action by “teeth” actors. Nonetheless, coordinated and sustained efforts to protect freedom of press and resist government’s intimidation by tracking and responding to government’s interference are still needed.

On Nigeria Strategy Level

The ultimate goal of On Nigeria is to reduce corruption by supporting Nigerian-led efforts that strengthen transparency, accountability, and participation through the sectoral accountability portfolios in the UBEC, HGSE, and electricity modules, complemented by the systems-focused work in criminal justice reform and strengthening media and journalism, as well as cross-cutting activities that reinforce and transcend the individual modules. Because On Nigeria has several areas of work, the strategy-level outcomes represent a “roll-up” of module-level and cross-cutting efforts to expand the number of anticorruption champions, shift social norms and behaviors, and support the government’s ability to confront corruption broadly. In addition to the grants described under the specific modules, 14 cross-cutting grants were operative by December 2017, representing \$6.38 million in funding.

The baseline period for the overall On Nigeria strategy covers 2015 through the start of On Nigeria grants in support of national-level anticorruption efforts in mid-2016. Data from Afrobarometer Round 4 Survey and Gallup at baseline showed corruption as a consistent priority for Nigerians in 2014 and illustrate one key initial window of opportunity—election of the new administration in 2015 based on an anticorruption platform.

Viewing the strategy overall, initial momentum is visible in each of the programmatic areas On Nigeria focuses on, with clear impetus at this stage in both “voice” and “teeth” outcomes in each of the modules and for the cross-cutting activities. CSOs are building capacity to hold government accountable. Grantees, CSOs, and government actors are collaborating to build coalitions that amplify anticorruption efforts.

The Government of Nigeria is also making progress on its anticorruption agenda, with passage and implementation of policies and laws. At the same time, there is still substantial work to be done, particularly to increase transparency in public procurement systems, continue asset recovery, further

strengthen the legal framework, continue confronting corruption, and above all, foment changes in social norms necessary to break corruption's vicious cycle.

For many of the long-term outcomes and impacts, it is still too early to see change at this primal stage. Moreover, while there is traction on several of On Nigeria's outcomes, more time will be required for anticorruption gains to spread and institutionalize beyond the targeted states and sectoral areas of UBEC, HGPF, and electricity distribution, and sustainably shift norms.

Contextual factors provide both enablers and constraints to On Nigeria's further progress: The continued existence of windows of opportunity provides viable entry points, partners, and enthusiasm for confronting corruption, while economic headwinds, security concerns, and weak public sector capacity could eclipse corruption as a priority or stall reforms. However, as Nigeria neared the end of the administration's first term, there was evidence that corruption remained a priority for Nigerians.

As part of the strategy, the MacArthur Foundation uses non-granting activities to support On Nigeria's goals. Grantees have found the MacArthur Foundation-facilitated collaboration to be a key successful feature of the strategy. They appreciate the capacity-strengthening gatherings that provide technical and peer support. Grantees seek more opportunities to expand on previous training in ways that advance project success and desire more strategic opportunities to work together. They describe the MacArthur Foundation's support in expanding On Nigeria's reach, further scaling up programs, and adding new focus areas as crucial to ensuring program's success.

Conclusions

On Nigeria efforts have contributed to momentum related to anticorruption efforts of civil society, government, and private-sector actors. This momentum does not guarantee continued progress, but confirms that efforts to date have value and should be continued. The following conclusions can be drawn from the findings of this first synthesis report of baseline and early progress.

- Across sectoral modules (UBEC, HGPF, and electricity) and systems-level modules (criminal justice and media and journalism), there is generally evidence of initial progress, momentum, and traction (see table below).
- The cohort approach, whereby the MacArthur Foundation convenes grantees (within modules or for specific approaches), has been productive in fostering coordination and effective use of resources.
- The broad On Nigeria strategy to address corruption in Nigeria continues to be relevant to existing public priorities and political windows of opportunity.
- In its first couple of years, On Nigeria has laid a strong foundation to contribute to the long-term achievement of reduced corruption in Nigeria, but more time will be needed to see results.

Summary of progress across the modules and at the strategy level

- Substantial progress: Clear signs of movement since the beginning of On Nigeria
- Moderate progress: Some momentum visible since the beginning of On Nigeria
- No progress or regression: No indications of movement since the beginning of On Nigeria or a worsening of the situation
- Inadequate or no data available to assess progress
- No outcome

Level of Theory of Change	UBEC			HGSF			Electricity			Criminal Justice			Media and Journalism			Strategy		
Interim – Capacity Building																		
Interim – Collaboration																		
Interim – “Voice”																		
Interim – “Teeth”																		
Long-Term Outcomes																		
Impact																		

1 Introduction

1.1 Purpose and Content of the Report

Since 2015, the MacArthur Foundation’s Big Bet On Nigeria is investing in efforts to reduce corruption in Nigeria by supporting Nigerian-led endeavors that strengthen transparency, accountability, and participation. EnCompass LLC serves as On Nigeria’s evaluation and learning partner, supporting refinement of its theory of change, developing and implementing a corresponding evaluation framework, and facilitating learning. This report presents the first synthesis of On Nigeria evaluation data covering 2016–early 2018, which correspond to the baseline period and early progress. The primary audience for this report is the MacArthur Foundation, with the final version made public to external audiences.

1.2 How to Read This Report

This report provides an overview of the Big Bet On Nigeria, including its theory of change and evaluation framework, followed by what we have learned to date for On Nigeria grants and other efforts that were active by the end of 2017. Since late 2017, On Nigeria has expanded granting in a number of new cross-cutting areas; these will be covered in the 2019 report. The section *What We Are Learning* is divided into separate sections for each module, followed by the overall strategy that brings together the various results and overarching picture. Each section includes (1) background, (2) information on what On Nigeria is trying to achieve, (3) the landscape and situation during the baseline period, (4) emerging progress, momentum, and ongoing challenges, (5) changes in the landscape since the baseline period, and (6) what we know about the validity of the assumptions underlying the theory of change. Annexes provide the complete theory of change and measures to assess outcomes and impacts, a full listing of grantees, details on the methodology, data collection instruments, documents reviewed, and tables with full data related to each outcome and impact, corresponding measure, context question, and theory of change assumption.

2 Overview of the Big Bet On Nigeria Strategy

2.1 Background and Problem

The endemic nature of corruption in Nigeria poses a significant challenge that stymies the country's development and hobbles the ability of its citizens to prosper. Corruption, impunity, and lack of accountability have far-reaching impacts on access to and quality of public services, the well-being of Nigerians, and overall development. Several new opportunities to achieve meaningful anticorruption progress have emerged, including the privatization of the electricity sector in 2013, the historic election in 2015 and subsequent peaceful transition of power to an opposition party, President Buhari's focus on anticorruption, and efforts to restructure the state-owned oil sector.³ The problem of corruption, paired with a unique opportunity for anticorruption reform, sets the stage for the Big Bet On Nigeria.

2.2 On Nigeria Theory of Change

On Nigeria's goal is to reduce corruption by supporting Nigerian-led efforts that strengthen accountability, transparency, and participation. On Nigeria will pursue this goal by contributing to the following national-level impacts:

- Institutionalization of federal and state government and private-sector systems for transparency, accountability, and corruption reduction
- Federal and state governments' enforcement of anticorruption laws and policies
- Citizens' across Nigeria receipt of goods and services previously hindered by corruption
- Shifts in social norms around corruption, with citizens engaging in anticorruption efforts, refraining from participating in corruption, and demonstrating decreased tolerance for corruption
- Citizens' increased trust in the government's ability to combat corruption

The On Nigeria strategy holds that corruption is not inevitable and can be combatted in concrete ways. To drive toward these impacts, the strategy builds on the "sandwich" theory⁴ that focuses on the interplay between "voice" and "teeth" as a pathway to social change. "Voice" represents citizens' actions to demand change and develop local solutions to corruption. "Teeth" represents the efforts of government and other high-level actors to develop and enforce laws and regulations, using incentives to discourage corruption and sanctions to punish it. The "sandwich" theory recognizes both these forces, combining a push from below and a squeeze from above—vital for effecting change and sustaining momentum. Building off this conceptual model, the On Nigeria strategy also acknowledges that for "voice" and "teeth" actors to implement change, they must have the capacity

³ Freedom House. 2015. *Nigeria: Freedom of the Press 2015*. Accessible at: <https://freedomhouse.org/report/freedom-press/2015/nigeria>.

⁴ Fox, J. 2015. *Social Accountability: What Does the Evidence Really Say?* World Development 72 (August): 246-361.

to act and the ability to collaborate on anticorruption efforts. The theory of change⁵ uses these four approaches to build and harness the “voice” of Nigerian citizens and the “teeth” of Nigerian public and private institutions—all in service of addressing the problem of corruption.



CAPACITY BUILDING

Develop stakeholders’ ability to conduct “voice” and “teeth” activities, and other complementary actions



COLLABORATION

Build stakeholder partnerships and collaboration to leverage and coordinate actions on corruption issues



VOICE

Amplify independent voices to monitor and report on corruption issues, and advocate for transparency and accountability



TEETH

Improve governmental and business transparency and accountability to address corruption issues

The On Nigeria strategy is multilayered, operating in five specific areas of programming (modules) in combination with cross-cutting activities, which are intended, together, to build pressure, increase demand for transparency and accountability, and amplify political will to reduce corruption. Three modules operate in two exemplar sectors, **education** and **electricity**, to demonstrate results of strengthened transparency, accountability, and ultimately, service delivery citizens can see and feel in their daily lives.



Reducing corruption in the Universal Basic Education Commission (UBEC) Intervention Fund



Reducing corruption in the National Home Grown School Feeding (HGSE) Program



Reducing corruption in the electricity sector related to distribution

Two additional modules address systems-level areas that strengthen corruption response and support anticorruption efforts:



Strengthening the criminal justice system through nationwide adoption/enforcement of the Administration of Criminal Justice Act (ACJA), supporting the ACJA-related anticorruption agenda, and bolstering complementary anticorruption laws and policies to ensure penalties for those who commit corrupt acts⁶






Strengthening media and journalism to generate demand for and encourage action by exposing corruption and sharing information about anticorruption efforts

Finally, a series of cross-cutting efforts, represented at the strategy level, build on and complement the modules, including:

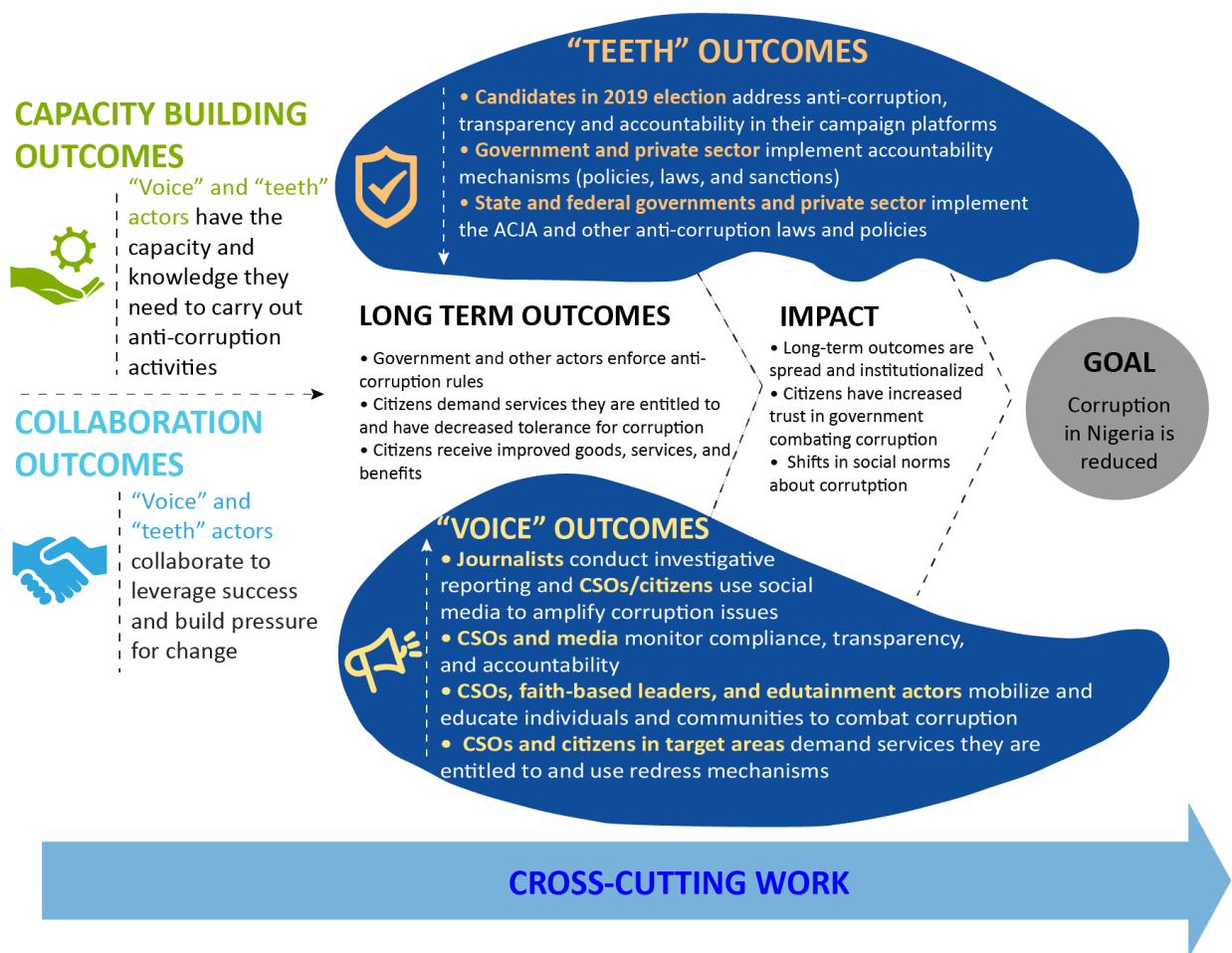
⁵ MacArthur Foundation. August 2018. *On Nigeria Theory of Change*

⁶ This strengthening will take place through education and permitted advocacy efforts at ministerial or agency levels, not through lobbying for the passage of the laws.

-  Civil society groups working to keep anticorruption efforts on the political agenda (during the 2019 elections and beyond)
-  Edutainment groups piloting norm and behavior change tactics as a means of reducing corruption
-  Groups mobilizing marginalized voices (youth and women) and new anticorruption champions (faith leaders)

Each module and the strategy overall have a theory of change that outlines how results will be achieved. The sectoral modules focus on targeted geographies (states or electricity distribution company catchment areas), and the theory of change includes outcomes reflecting spread and institutionalization statewide and, eventually, national-level impact. See Exhibit 1 for the strategy-level theory of change that highlights outcomes related to the four approaches (“voice,” “teeth,” capacity building, and collaboration). Annex 1 provides the complete strategy-level theory of change with the full list of long-term outcomes and impacts, and the specific module-level theories of change, along with measures used to assess progress.

Exhibit 1: On Nigeria theory of change

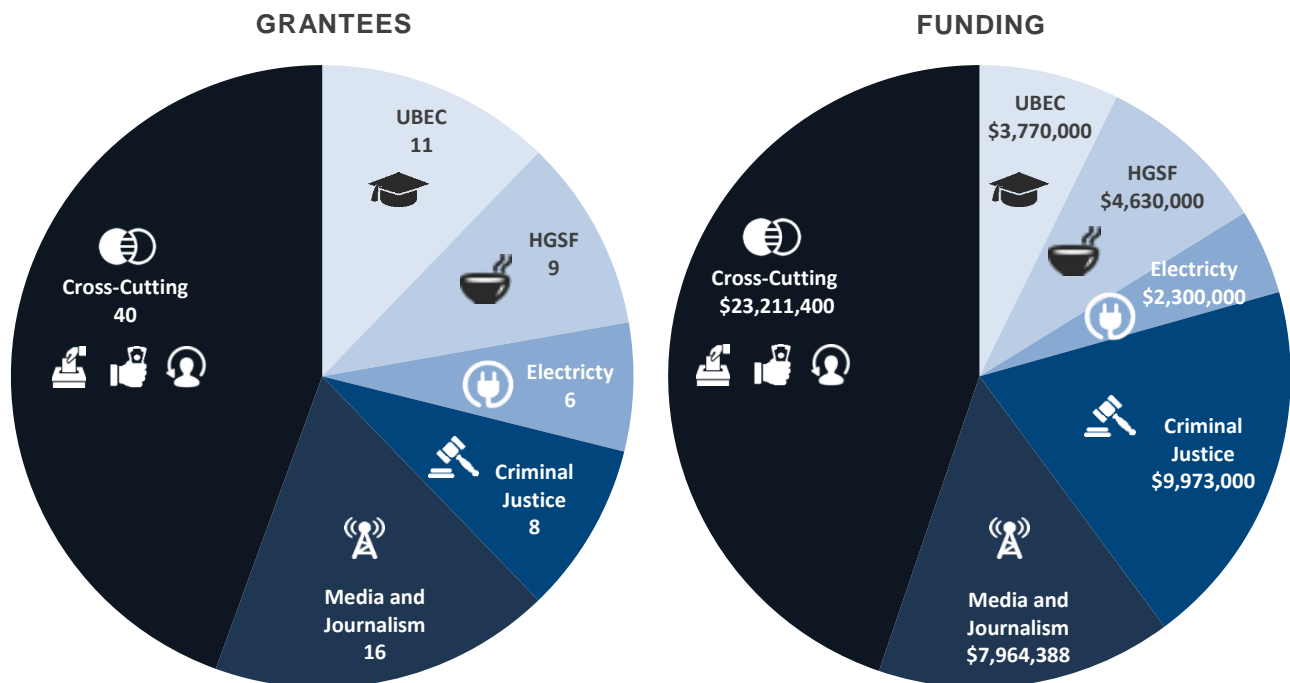


2.3 On Nigeria Grant Portfolio

The On Nigeria portfolio contains 98 grants totaling \$51.85 million, as of February 2019. Exhibit 2 shows the breakdown of the number of grantees by module and level of funding for the full grant portfolio, and Annex 2 presents the full list of grantees by module. The MacArthur Foundation's On Nigeria team also undertakes non-grant-making activities, including grantee capacity building, fostering cross-grantee collaboration, and their own collaboration activities with other donors and stakeholders.

Exhibit 2: On Nigeria grantees and funding by area/module

(as of February 2019)



Cross-cutting areas account for almost half of both the funding and the number of grantees, with the remaining being fairly evenly divided among criminal justice, media and journalism, and the combined value of the sectoral modules.

3 Evaluation and Learning Framework (Evaluation Design)

3.1 Guiding Evaluation Questions and Information Needs

On Nigeria has designed its evaluation and learning activities to achieve two equally important purposes: (1) facilitate ongoing learning among On Nigeria decision makers and (2) tell the rich story of On Nigeria's results achieved, how they were brought about, and the MacArthur Foundation's contribution to change. The On Nigeria evaluation and learning framework accomplishes these dual purposes by seeking to answer three overarching evaluation questions:

1. How is the MacArthur Foundation's strategy contributing to changing transparency and accountability of government and private-sector actors?
2. How is the MacArthur Foundation's strategy contributing to changing social norms and citizens' behaviors related to corruption?
3. What kinds of adaptation or changes are needed in the theory of change and/or strategy to achieve better results?

These overarching evaluation questions frame the specific information needs related to landscape, feedback, outcomes, and impacts (see Exhibit 3).

Exhibit 3: Learning needs addressed by the evaluation framework

How is the strategy contributing to changing both transparency and accountability of government and private sector actors?



How is the strategy contributing to changing both social norms and citizen behaviors related to corruption?

What kinds of adaptation or changes are needed in the theory of change and/or strategy to achieve better results?

IMPACT ACTIVITIES

Guiding questions seek information about the extent to which the Foundation is contributing to momentum beyond the targeted sectors and geographical areas in which support is focused



- What evidence is there of institutionalization and spread of outcomes? Of progress towards the goal?
- What evidence is there of changes in social norms related to corruption and expectations related to accountability and transparency?
- What unintended impacts, both positive and negative, are evident?

OUTCOME ACTIVITIES

Guiding questions seek information about the extent to which the strategy is achieving its intended outcomes



- What evidence is there of progress toward the intended outcomes? What unanticipated changes are evident?
- To what extent are the grantmaking and non-grantmaking activities contributing to these outcomes? What other factors appear to influence the observed changes the most?

LANDSCAPE ACTIVITIES

Guiding questions seek information about the context and environment in which On Nigeria operates



- What windows of opportunity continue to exist for the advancement of the goals?
- What economic, social, and political forces and trends, and internal motivators are influencing progress?
- What assumptions underlying the theory of change remain valid?

- How is On Nigeria being implemented?
- What are the strengths of the way On Nigeria is being implemented? How can these strengths be maintained, amplified, and expanded?
- What could be improved or done differently in implementation? How could these adaptations build on strengths and better account for the current context?



FEEDBACK ACTIVITIES

Guiding questions seek reflections from partners and grantees on the implementation and effectiveness of grantmaking and non-grant-making activities

3.2 Design and Measures

On Nigeria has both an ambitious goal—to reduce corruption in Nigeria—and similarly ambitious short- and long-term outcomes. The strategy is complex—because corruption is complex and ever evolving—and progression toward the goal of reducing corruption will most certainly not be linear. Building from the theory of change, On Nigeria’s evaluation and learning framework is designed to capture the nuanced information needed to understand progress and the potential for ongoing work in order to adapt the strategy as needed.⁷ The evaluation and learning framework measures progress at both outcomes and impacts levels.

Outcomes represent the nearer term and intermediate changes in attitudes and actions of target actors (e.g., individuals, communities, organizations, and policies) that result directly from the On Nigeria strategy. These changes should be observable or assessable, and aligned with the On Nigeria’s approaches.

⁷ MacArthur Foundation. August 2018. *On Nigeria Evaluation and Learning Framework*.

- *Interim outcomes* are results that can be expected to be achievable by the 2020 scheduled strategy review. They particularly relate to target-audience behavior represented in the four approaches of the strategy: “voice,” “teeth,” capacity building, and collaboration.
- *Long-term outcomes* are results that generally depend on the achievement of interim outcomes, and demonstrate systems performance, service delivery, and citizens’ expectations. However, in some cases, factors other than On Nigeria may bring about a change earlier, or the change may not follow a straightforward linear process as theorized by the theory of change. Some long-term outcomes might be achievable by the 2020 scheduled strategy review. Others could take longer, although some progress or momentum should be visible by the scheduled strategy review.

Impacts are the longer term aspirational changes in the system where the strategy operates. These changes represent the overall significance and value of the strategy. For On Nigeria, this particularly relates to the spread of results beyond the initial geographical areas and sectors supported for broader, national-level impact on reducing corruption and increasing trust in government.

To measure progress toward outcomes and impacts over time, On Nigeria uses a mixed-methods, before-after design based on a set of quantitative and qualitative measures (presented in Annex 3).⁸ Each module or cross-cutting area has a set of measures linked to key outcomes (i.e., not every outcome is measured). An outcome is considered to be “key” if achieving it is crucial to the success of the theory of change or if it can stand as a proxy for other, related outcomes in the theory of change.⁹ Quantitative measures gauge the strength of effect, the breadth of momentum, and the degree of influence. Qualitative measures describe how key actors have implemented actions to demonstrate contribution and results. They illuminate the strength of implementation of anticorruption practices and collaboration.

Landscape (context and validation of assumptions) and feedback evaluation questions are answered through a mix of exploratory and descriptive data.

Baseline Period: To anchor the On Nigeria story in a meaningful way, we consider the two periods of time for our comparisons and assessments of momentum: the baseline period (“what was”) and the period of On Nigeria granting (“what is”), which for the case of this report, goes until 2018. One initial window of opportunity for the Big Bet On Nigeria came from the election of President Buhari in early 2015, when Nigerians voted for anticorruption.¹⁰ Granting began in June 2015, although some module activities began sooner than others; thus, the baseline periods are not identical across modules (see Exhibit 4).

⁸ While temporal stability in measures is crucial for assessing trends over time, the evaluation and learning framework’s measures remain flexible to shifts in programming priorities that affect measurement needs.

⁹ Some outcomes, mostly interim outcomes, do not have measures assigned, but information captured through landscape and grantee data will be included in reports as relevant.

¹⁰ Other windows of opportunity include, but are not limited to: passage of the Administration of Criminal Justice Act, privatization of electricity distribution, support for the Home Grown School Feeding Program, establishment of the Presidential Advisory Committee on Anti-Corruption.

Exhibit 4: Baseline periods and when On Nigeria was active by module and for the strategy overall











3.3 Methods

The On Nigeria evaluation design specifies seven different methods to answer the four key learning needs:

- **Primary data sources:** national telephone survey, media monitoring (including the quality assessment of investigative reporting), qualitative interviews and focus groups, and feedback workshops
- **Secondary data sources:** document review, grantee data, and corruption indices

Exhibit 5 summarizes the data collection methods, and Annex 3 provides a detailed description for each method, including the sampling design, data collection and analysis procedures, and limitations. Annex 4 contains the 2018 data collection tools for primary source data, and Annex 5 contains the document review sources by module.

Exhibit 5: On Nigeria data collection methods by learning need

	Frequency of Measurement	Landscape	Feedback	Outcome	Impact
 National Telephone Survey	Annual			X	X
 Media Monitoring	Ongoing			X	
 Quality Assessment of Investigative Reporting	Biannual			X	
 Qualitative Interviews and Focus Groups	Annual	X	X	X	X
 Feedback Workshops	Annual		X	X	
 Document Review	Annual	X		X	X
 Grantee Data	Ongoing	X		X	X
 Corruption Indices	As available				X

3.4 Limitations

While data collection, sampling, and analysis have been designed to maximize evaluation rigor within the time and resources allocated, limitations exist related to measuring impact, analyzing contribution, and data availability.

- Measuring impact and progress to the overall goal:** Due to its nature as an illegal activity and because corruption is a collective term covering a range of actions, measuring corruption directly is highly challenging and experts continue to debate the most accurate techniques. On Nigeria’s evaluation framework uses perceptions of corruption, direct experiences with bribery, citizens’ views of social norms related to corruption, and aggregate indices; use of transparency and accountability tools serve as partial proxy measures. However, each of these methods has its own limitations: corruption perceptions are susceptible to rapid shifts based on current events and extent of reporting itself may shift as a society confronts corruption; experiences with bribery capture just one of many types of corruption On Nigeria seeks to address; social norms are endogenously related to corruption (both driving it and resulting from it), but distinct from the acts themselves; aggregate indices are long-term trailing indicators that are insensitive to incremental changes; and use of transparency and accountability tools is a proxy that measures anticorruption actions rather than corruption itself and does not always have a strong empirical link to reducing corruption. To mitigate this challenge, the evaluation and learning framework uses multiple measures and data sources triangulated and analyzed within the broader political and economic context.

- **Analyzing contribution in a complex system:** The On Nigeria strategy involves numerous grantees seeking to influence various core components of the corruption system. Activities within each module attempt to change practices for a wide variety of actors: citizens, civil society organizations (CSOs), government actors, and the private sector; these activities and anticipated changes occur on independent timelines. Other actors' anticorruption activities could also influence outcomes. Actual causes of observed outcomes and impacts cannot be determined with certainty, but landscape data capturing broader trends in the On Nigeria context help build a more robust understanding of the MacArthur Foundation's specific role in promoting change through contribution analysis.

On Nigeria's sectoral modules work in specific communities in specific states, while criminal justice, media and journalism, and cross-cutting grantees work more broadly. However, grantees working within a module are not necessarily working in the same community or state. The geographic diversity of On Nigeria's programming complicates before/after analysis by increasing chances of differential effects across regions. Sampling designs for media monitoring and the national telephone survey help mitigate this limitation by ensuring broad representation of On Nigeria's target regions.

- **Data availability and response bias:** There are very limited secondary data available on most outcomes and impacts in the On Nigeria theory of change. This situation, combined with the fact that the first rounds of primary data collection occurred only in 2018, means that concrete baseline data are not available for most measures. Qualitative interviews and the national telephone survey included some questions to gather *reconstructed* baseline data for a limited number of outcomes, but these data provide only a perception of momentum, not a definitive status prior to On Nigeria's launch. Only media monitoring data, which sample 2016, and some secondary sources (including corruption indices) provide quantitative measures that can be considered baseline. As a result of this data availability limitation, extent of progress may be underestimated if it began to occur prior to 2018 data collection.



All data collection with human subject respondents has potential biases arising from the cultural, socioeconomic, educational, ethnic, gender, and political backgrounds of data collectors and respondents. Careful training of data collectors, vetting and pilot-testing data collection tools, and effective probing help mitigate bias and response error among respondents. The national telephone survey, the most cost-effective method, samples among those with phones and necessarily underrepresents households without phones; weighting and estimation techniques help mitigate this bias.

Triangulation of data across various sources also helps mitigate many of the limitations listed above.

3.5 What Is in the 2018 Synthesis Report and How to Read Findings

Data presented in this report render context and progress through the first half of 2018. Exhibit 6 shows the specific samples for each data collection method represented in this report.

Exhibit 6: Methods and samples for 2018 On Nigeria data collection

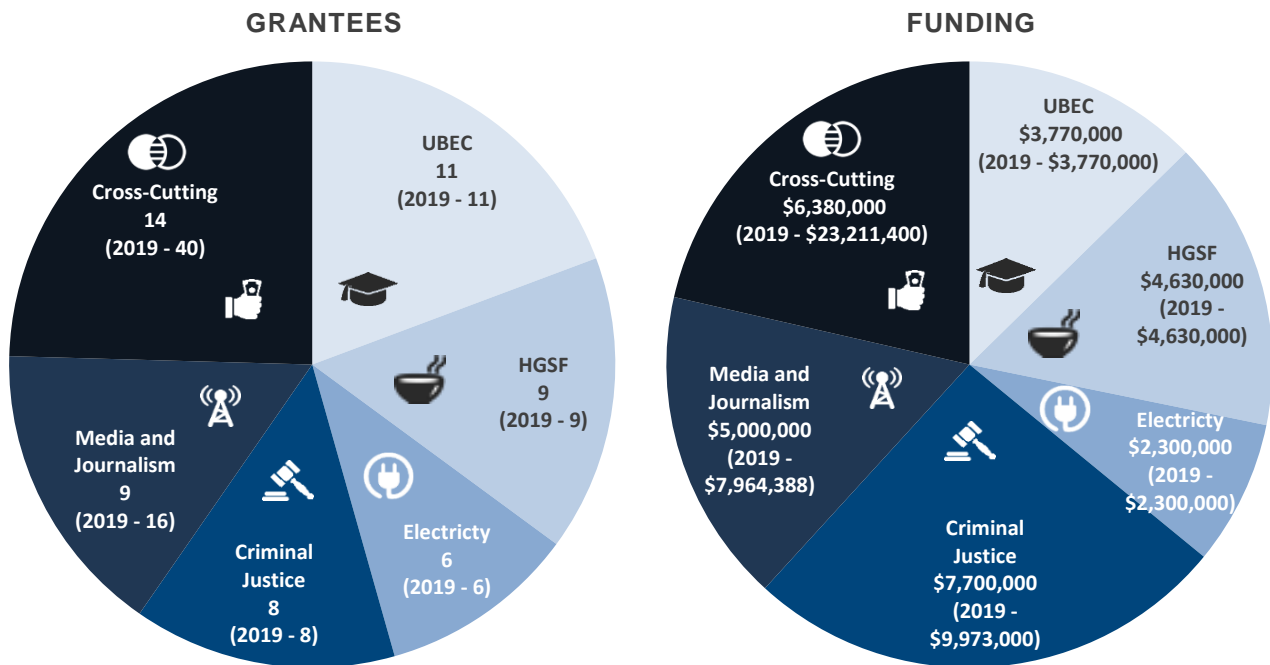
Methods	Data Collection/Coverage Period	Sample Size
 National Telephone Survey (Opinion Poll)	Collected Sept 2018	8,043 respondents
 Media Monitoring	Covering all 2016 and 2018	2016: 23 sources, 1,266 articles 2018: 26 sources, 2,039 articles
<i>Quality Assessment of Investigative Reporting</i>	<i>Covering all 2016</i>	<i>1,266 articles</i>
 Qualitative Interviews and Focus Groups	Collected Feb–March 2018	169 interviews
 Feedback Workshops	November 2018	112 participants representing 53 grantee organizations
 Document Review	Covering 2015–July 2018	450 relevant documents (news stories; government, donor, and civil society reports; public grantee reports)
 Grantee Data	Collected 2016–2018	Grantee annual reports: 28 (counted and reviewed during document review) Grantee monitoring data: CLEEN ¹¹ and Stakeholder Democracy Network surveys; Girl Child Concerns and another grantee baseline
 Corruption Indices	Covering 2015–2017	Three global indicators: Afrobarometer Survey and Gallup (polls), World Bank Control of Corruption Indicator (index)

The 2018 data collection covers the 57 grantees actively implementing grants by the end of 2017, for a total of \$29.78 million (see Exhibit 7).

¹¹ CLEEN stands for Centre for Law Enforcement Education.

Exhibit 7: Grantees and funding represented in the 2018 data collection

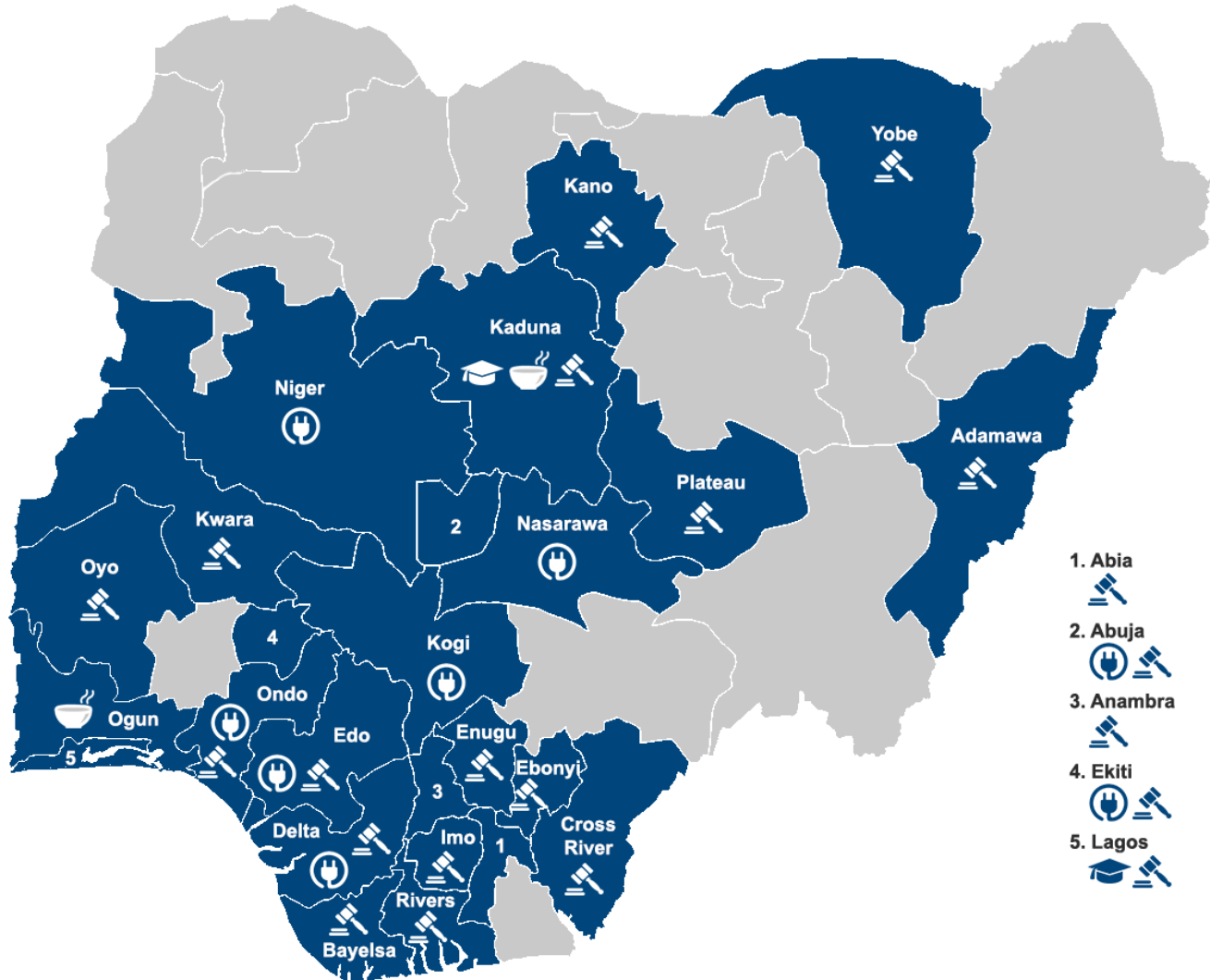
(Total values listed in parentheses)



Grantees working on the sectoral modules operate in specific geographies, while those in other modules have activities in a variety of states. Exhibit 8 shows the geographic coverage of various modules and areas of work for all of On Nigeria.

Exhibit 8: States where grantees are working

(as of July 2018)



The following section, *What We Are Learning*, presents findings for each module, and the strategy-level and overall feedback. Each subsection presents background, the On Nigeria theory of change, landscape during the baseline period, findings on early progress, changes in the landscape since On Nigeria started, testing of assumptions, and a brief summary of status in 2018. Findings are organized around the theory of change questions at each level of the theory of change (“teeth,” “voice,” capacity building, collaboration, and long-term outcomes and impacts), as shown below.

Key evaluation question at this level of the theory of change

Outcomes and impacts linked to this level of the theory of change.



Module-level outcomes' specific levels of the theory of change: "teeth," "voice," capacity building, collaboration, long-term outcomes and impacts

- Listing of outcomes in the theory of change (see Annex 1) at this level of the theory of change

NOTE: Where no data were available to assess progress, the outcome is listed in grey italic font.

Finding: A summary statement of the finding, which is further supported by data in the text that follows.

Summary statement of finding

4 What We Are Learning

4.1 🎓 Universal Basic Education Intervention Fund Program

4.1.1 Background

The Universal Basic Education Commission (UBEC) administers the Universal Basic Education Intervention Fund program to accelerate infrastructure renewal and teacher development in public primary and junior secondary school schools. The UBEC Intervention Fund was established in 2004. Two percent of the federal government’s Consolidated Revenue Fund is dedicated to finance UBEC.¹² To participate, states must develop a State Action Plan detailing the specific infrastructure and teacher development projects it will use funds on. To be eligible for UBEC Intervention Fund monies, states must also contribute 50-percent matching funds and provide a detailed accounting of funds used in the previous year. Upon receipt of funds distributed by UBEC, each state’s State Basic Universal Education Board (SUBEB) hires contractors using the funds to purchase materials and carry out school construction projects specified in the State Action Plan.

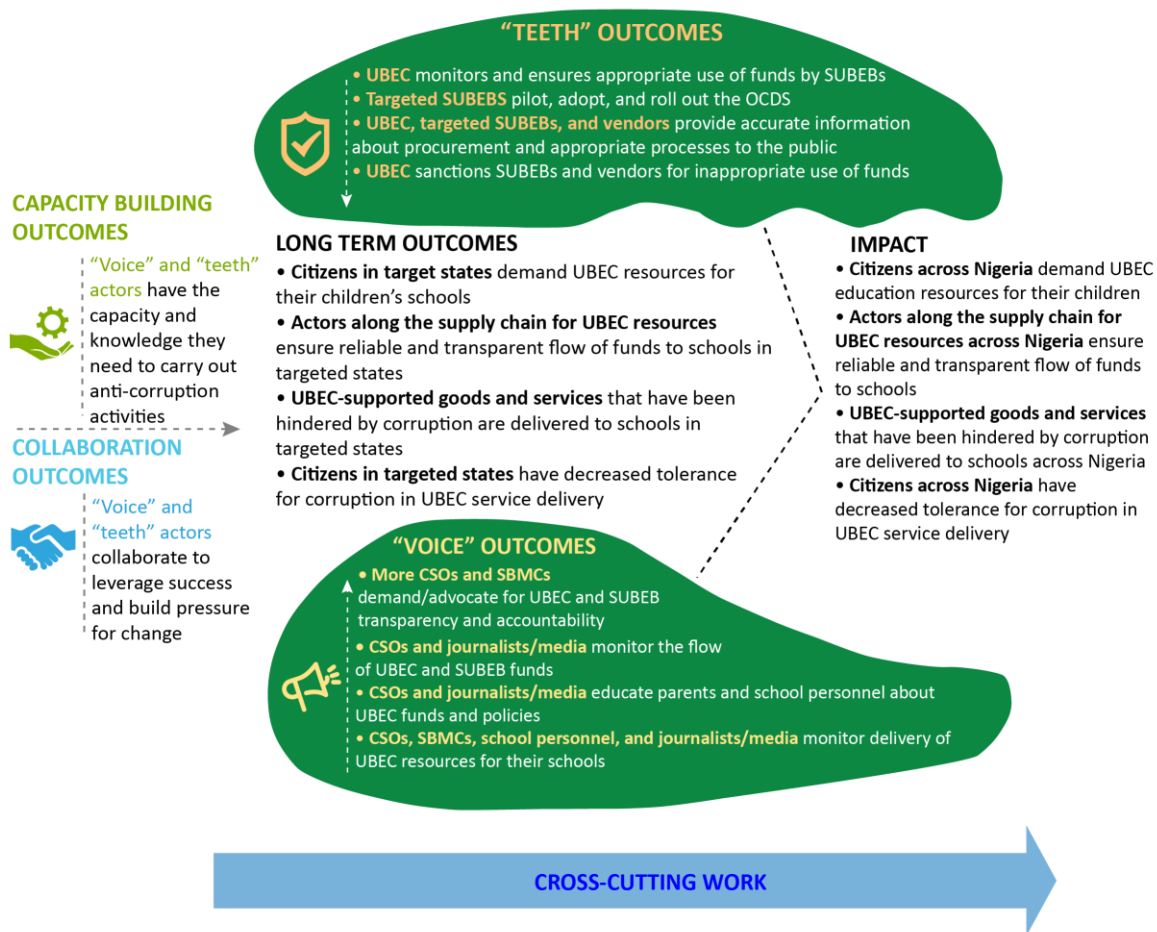
4.1.2 UBEC Theory of Change

The On Nigeria theory of change for the UBEC module focuses on increasing transparency and accountability in the UBEC Intervention Fund Program to ensure infrastructure projects selected to receive funding are completed to standard and on time. Exhibit 9 provides a visual representation of the UBEC theory of change, demonstrating how the “sandwich” strategy plays out in this module (Annex 1 provides a more detailed version). On Nigeria focuses on Kaduna and Lagos states, as well as federal-level transparency and accountability policies and practices.



¹² Source: 2016. *Universal Basic Education Commission Annual Report*

Exhibit 9: UBEC theory of change



Success will be demonstrated if (1) citizens demand UBEC Intervention Fund resources for their children’s schools and have decreased tolerance for corruption related to these resources; (2) actors along the supply chain for the UBEC Intervention Fund ensure regular, reliable, and transparent flow and use of allocated funds to schools in the states; and (3) UBEC Intervention Fund-supported goods and services previously hindered by corruption are delivered to schools. Success will be reflected at the impact level when these same results have spread to other states across Nigeria.

On Nigeria has funded 11 grantees in the effort to reduce corruption in the UBEC Intervention Fund. As of 2018, \$3.77 million had been awarded to these grantees. Two of eleven grantees began work in 2016, and others in 2017. Thus far, efforts have focused on: (1) 96 percent of primary and junior secondary schools in specific local government areas (LGAs) targeted in UBEC action plans for 2014–2016 in Kaduna, and (2) 88 percent of targeted schools in UBEC action plans for 2015–2017 in Lagos state.¹³ These schools represent 3 percent of primary and junior secondary schools in Kaduna and 1.5

¹³ This represents 3 percent of primary and junior secondary schools in Kaduna state and 1.5 percent in Lagos state. Sources: Rates of UBEC Action Plan schools covered based on information provided by On Nigeria grantees, and are cumulative over the years.

percent in Lagos state.¹⁴ Two grantees have supported piloting and rollout of the Open Contracting Data Standard (OCDS).¹⁵ Grantee efforts focus on amplifying independent voices to monitor and report on corruption issues in the UBEC Intervention Fund, and advocate for anticorruption measures. All grantees have components of capacity building and collaboration. UBEC grantees also work with journalists and state and federal officials across states to adopt and implement good transparency and accountability practices.

By the 2020 scheduled strategy review, success will be determined by the degree to which: (1) UBEC/SUBEBS have and use systems to increase accountability and transparency in the flow and use of UBEC resources (particularly the OCDS); (2) CSOs actively monitor and document whether resources are reaching the intended schools; (3) actors along the UBEC supply chain use/participate in accountability systems; (4) UBEC responds to citizens' reports, and sanctions SUBEBs and vendors for inappropriate use of funds; (5) journalists report on UBEC in Kaduna, Lagos, and others states; and (6) schools receive UBEC-funded resources, as laid out in state action plans being operationalized in 2018–2019.

4.1.3 Landscape at Baseline (2015–2016)

The baseline period for the On Nigeria efforts related to the UBEC Intervention Fund covers 2015 through the start of On Nigeria grants in August–September 2016. During this period, the UBEC Intervention Fund was characterized by mismanagement, corruption, and lack of accountability.¹⁶ A small group of decision makers at UBEC and SUBEBs determined which states and contractors received funds, and when funds were distributed. With as much as 35 billion Naira (nearly \$100 million) distributed across states annually, the program has been ripe for multiple forms of corruption, such as embezzlement, bribery, favoritism, and contracting fraud. UBEC Intervention Fund management appears to have gone largely unchecked, and with very limited public awareness of the program, there has been limited scrutiny of potential corruption.

Successful implementation of the UBEC Intervention Fund across Nigeria depends on states' access to funding. States' access to allotted funds has been slow over the years;¹⁷ more than 48 billion Naira

¹⁴ Lagos state penetration rate for all schools is based on lists of schools On Nigeria grantees provided; Kaduna state penetration rate for all schools is based on school lists in a Ministry of Education's *Kaduna State Annual School Census Report 2013–2014*, and information grantees provided.

¹⁵ The OCDS enables disclosure of data and documents at all stages of the contracting process to support organizations to increase contracting transparency, and allow deeper analysis of contracting data by a wide range of users.

<http://standard.open-contracting.org/latest/en/>

¹⁶ Abdullahi, N.J.K. 2018. *Corruption in education system and management of primary schools in Nigeria*. Malaysian Online Journal of Education and Management (MOJEM). 6(1):21-35; World Bank. 2015. *Governance and finance analysis of the basic education sector in Nigeria*. September 2015.

¹⁷ Edukugho, E. 2010. *Jonathan paves way for states to access N200bn UBE fund with CBN*. Vanguard. May 6, 2010; Adebuseyi, D. 2017. *Ekiti assembly demand Fayemi arrest over fraud during his tenure*. Daily Trust. February 7, 2017; The Citizen online. September 15, 2017. *States and the UBEC Fund – This day*; Universal Basic Education Commission. 2008. *ICPC Recovers N3b Misappropriated UBEC Fund*. February 2008.

(approximately \$132 million) sat untouched by states from 2015 to 2017.¹⁸ Prior to grantees’ work in 2016, neither UBEC nor any SUBEB had implemented the OCDS. CSOs, parent groups, school officials, and school groups interviewed in 2018 indicated that during this baseline period, UBEC Intervention Fund project monitoring by UBEC and SUBEBs was greatly insufficient. Some interviewees implied there was little capacity building or collaboration related to monitoring or advocacy among CSOs. Similarly, qualitative interview respondents stated that UBEC and SUBEB representatives lacked capacity to manage, monitor, and avert corruption in the UBEC Intervention Fund.

4.1.4 Early Progress and Momentum (2016–2018)



Intended UBEC “Teeth” Interim Outcomes

- **UBEC** monitors and ensures appropriate use of funds by SUBEBs.
- **Targeted SUBEBs** pilot, adopt, and roll out the OCDS.
- **UBEC, targeted SUBEBs, and vendors** provide accurate information about procurement and appropriation processes to the public, CSOs, media, and relevant government agencies.
- **UBEC** sanctions SUBEBs and vendors for inappropriate use of funds.

Finding: UBEC is showing some signs of responsiveness to CSOs’ demands for information and has taken preliminary steps to put an OCDS in place. However, UBEC and SUBEBs are not yet providing adequate, timely, and trusted UBEC Intervention Fund monitoring data, and continue to limit access to information they have available, despite open government policies

Qualitative interviews and documents reflecting perspectives of school officials, parent groups, and CSOs in Kaduna and Lagos indicated that UBEC and SUBEBs were not yet monitoring projects or ensuring other monitoring systems were in place. However, some CSOs reported that SUBEBs were aware UBEC was more closely monitoring SUBEBs’ work. Interviewed SUBEB representatives noted that the reason they were not monitoring UBEC Intervention Fund projects was the lack of community interest in the Fund’s projects. Conversely, parent groups indicated that a lack of SUBEBs’ interest and responsiveness to requests to monitor projects and demands for improvements had reduced community members’ expectations that their involvement can make a difference.

Beginning in September 2016, UBEC and an On Nigeria grantee began piloting the OCDS system using the Budeshi platform.¹⁹ In 2018, UBEC started developing an action plan to implement the OCDS across Nigeria. Kaduna state signed a memorandum of understanding with the grantee in 2017 to apply OCDS to its state contracting.²⁰ As of December 2018, the Budeshi platform has data uploaded

¹⁸ Source: UBEC website 2018: *UBEC non-accessed matching grant from 2005 to 2018 as of September 11, 2018* <https://www.ubec.gov.ng/media/grant/6148a2079696ca4aeaf0aa71c44ca0b78478321c.pdf>

¹⁹ *Budeshi*, a Hausa term meaning *open it*, is an OCDS database an On Nigeria grantee developed. Using the database, stakeholders can monitor and compare contracted amounts and specifications for different projects across various locations and contractors; Nyager, S. 2016. *The 3 year expedition to unlock basic education data: A true short story*. Budeshi, October 18, 2016. <http://www.budeshi.org/2016/10/the-3-year-expedition-to-unlock-basic-education-data-a-true-short-story/>

²⁰ Alabi, CT. 2018. *Kaduna, PPDC sign MoU to integrate contracting platforms*. *Daily Trust*, December 10, 2018.

for 1,003 UBEC projects. However, by the end of 2018, neither UBEC nor the pilot state, Kaduna, had operationalized Budeshi or any other OCDS system to publish up-to-date data for each step of the contracting process.

Most of the time, when we are able to access UBEC website, we discover [the] bulk of information therein are old and obsolete. – Qualitative interview: Government official (state level)

For the most part, CSOs, journalists, and local officials have found data accessed through websites or requested from SUBEBs and UBEC to be limited in scope, out of date, incomplete, or unavailable. One grantee report for 2016²¹ noted that they published UBEC-provided records and information for projects in Anambra, Delta, Edo, Kano, and Ogun, but UBEC did not provide data for Lagos. Another grantee reported, in 2017, that they could not access UBEC fund information,²² and in Lagos, a parent identified lack of public access to SUBEB action plans as a problem in basic education. Without an OCDS or other online platform providing access to relevant data, CSO grantees requested public data from SUBEBs and UBEC directly, often under the Freedom of Information Act (FOIA). One grantee that monitors FOIA requests noted that 80 percent of those requests to their SUBEB or UBEC remained unfulfilled. CSOs and school/parent groups report that current UBEC Intervention Fund decision makers' lack of transparency at all levels limits the ability to reduce corruption along the supply chain for the program.

Data from qualitative interviews and feedback at the November 2018 grantee convening are not adequate to determine whether UBEC is sanctioning states appropriately, but according to CSOs, SUBEBs, and UBEC officials, the number of states sanctioned since 2015 varies from 0 to 10. There are two documented examples of SUBEBs being sanctioned in 2017, including five Edo SUBEB board members for awarding contracts to vendors they collected monetary bribes from.²³ UBEC also suspended five SUBEB accounts due to multiple reasons, including diversion of resources.²⁴

Based on qualitative interviews, UBEC has shown some small signs of responsiveness to CSOs' requests for information since 2015, with examples of sharing data more readily. While SUBEBs do not appear to be sharing information, within the very small sample of schools included in the qualitative data collection, UBEC and SUBEB representatives have attended more CSO-sponsored awareness events, and the Kaduna SUBEB is responding to CSO and community monitoring and demands. Due to the small sample, these data are not generalizable.

A lot has changed. Even the design and execution period of projects has change[d]. Before, we were not given execution period of projects. The contractor will just start working without knowing his or her start date and when he or she is to complete work. But over the last two years, there has been significant improvement. We are now consulted and there is great improvement in the work done by contractors. This is because there is adequate monitoring by NGOs and community members. – Qualitative interview: Government official (LGA)

²¹ Grantee annual report, 2016.

²² Grantee annual report, 2017.

²³ Leadership. 2017. *Corruption: Court Remands APC Women Leader, SUBEB Boss and 3 Others.*

²⁴ This Day. 2017. *65% of Nigerian Schools Lack Electricity.*



Intended UBEC “Voice” Interim Outcomes

- **More CSOs and school-based management committees (SBMC)** demand/advocate for transparency and accountability related to UBEC and SUBEBs.
- **CSOs and journalists/media** monitor the flow of UBEC and SUBEB funding.
- **CSOs and journalists/media** use information from the OCDS and other sources to educate parents and school personnel about education funds and policies.
- **CSOs, SBMCs, school personnel, and journalists/media** monitor the delivery of promised UBEC-supported education resources and demand UBEC education resources for their schools.

Finding: Grantees, local CSOs, and school officials appear to have increased their monitoring of and demand for UBEC and SUBEB transparency and accountability over the past 3 years, finding ways to circumvent the lack of an OCDS; however, school personnel and SBMCs could be more engaged.

Qualitative interview data from grantees and parents, and grantee annual reports revealed multiple examples of collaborative grantee and community advocacy efforts, including:

- CSOs collaborating with community leaders to host town hall meetings where community members can discuss the program with UBEC and SUBEB officials
- Communities requesting state and federal government officials to attend UBEC Intervention Fund project launches and monitoring activities
- CSOs using data visualizations to support advocacy efforts for SUBEB and UBEC OCDS use

Despite the lack of numeric baseline data, grantee documents and qualitative interviews indicate that relatively more CSOs, parent groups, and school representatives are monitoring UBEC Intervention Fund school infrastructure projects. Grantees are employing innovative ways to monitor these efforts, in spite of the lack of standardized public data in contracting. Using State Action Plans, Bills of Quantity (available in some states), and receipts, these monitoring groups obtain accurate and complete information regarding services, materials, and timelines planned and executed for funded building projects. In one example, a contractor in a northern Kaduna town was required to stop work and follow the Bill of Quantity.²⁵

... [T]he most important change I notice is that more and more people are getting involved in the process. NGOs and CSOs are involved in tracking the release of funds and monitoring of projects... In fact, they are in the LGA asking why three projects expected to be completed in January have not been completed [in March]. – Qualitative interview: Government official (state level)

In some of the small sample of schools, community representatives noted that SBMCs play a more limited role in monitoring UBEC Intervention Funds in some communities, and school officials or parents are filling, or being asked to fill, the gap where SBMCs are less engaged.

²⁵ Source: Grantee Convening: Personal communication with grantee, November 2018.

Exhibit 10 presents the range of corruption disruptors beginning to operate across “voice” and “teeth” actions within the UBEC Intervention Fund, as well as their status as of 2018.



Intended UBEC Capacity Building Interim Outcomes

- **CSOs, SBMCs, and journalists/media** are aware of entitlements, government funds, and processes related to UBEC and SUBEBs.
- **CSOs, SBMCs, and journalists/media** know how to monitor, investigate, and advocate for action on the OCDS and transparent flow of funds.
- **UBEC and targeted SUBEBs** know how to use the OCDS.

Finding: As of 2018, schools and communities lack knowledge and clarity about program’s organization and processes, thereby hindering the reach and effectiveness of “voice” actions.

The ability of “voice” actors to effectively monitor UBEC and SUBEB actions, and demand transparency and accountability, is predicated on their knowledge of the UBEC Intervention Fund and how it is supposed to work. With On Nigeria funding, six grantees reported implementing training and awareness-raising events for community members and leaders (including SBMCs), government officials, and the media to encourage participation and facilitate UBEC project tracking. CSOs have hosted training, workshops, and discussions to enable SBMCs, other school and parent groups, and SUBEB personnel to understand and monitor their UBEC Intervention Fund projects, and speak out when there are problems. These CSO-led events educate participants on how citizens can obtain data through FOIA and monitor performance of SUBEBs, education secretary, and contractors in the absence of up-to-date OCDS data. Grantees have been training SBMCs to track retail corruption/demand accountability and support non-functional SBMCs. Grantees are using lectures, social media, and online videos to strengthen public’s knowledge and capacity to monitor the flow of the Ministry of Education’s budgetary allocations.²⁶

Although general knowledge of parents is not a specific intended On Nigeria outcome, the national telephone survey data corroborate findings from qualitative data of low knowledge among school officials and parent committee members. The national telephone survey found that 48 percent (95% confidence intervals: 30%–46%) of parents of children in government primary or junior secondary schools (schools eligible for UBEC Intervention Fund project funds) were unaware of the UBEC Intervention Fund (Exhibit 11).

²⁶ Source: Grantee annual reports 2016 and 2017

Exhibit 10: UBEC Intervention Fund corruption chain and disruptors

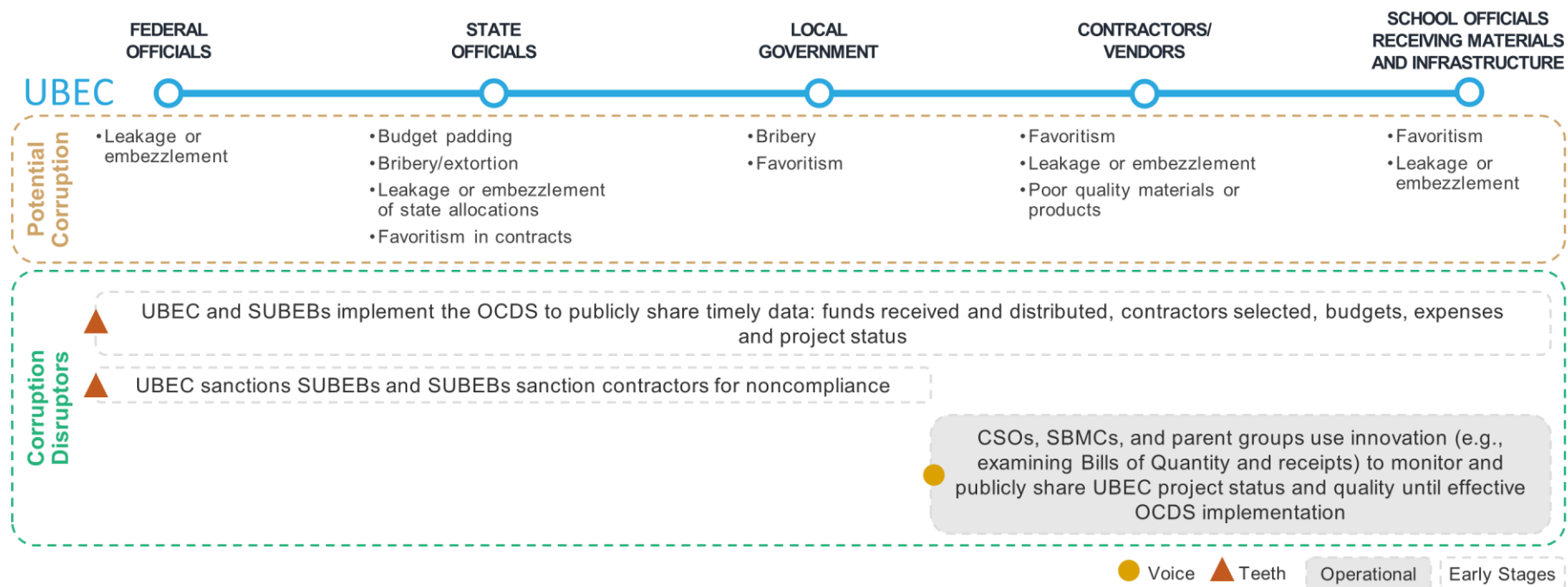
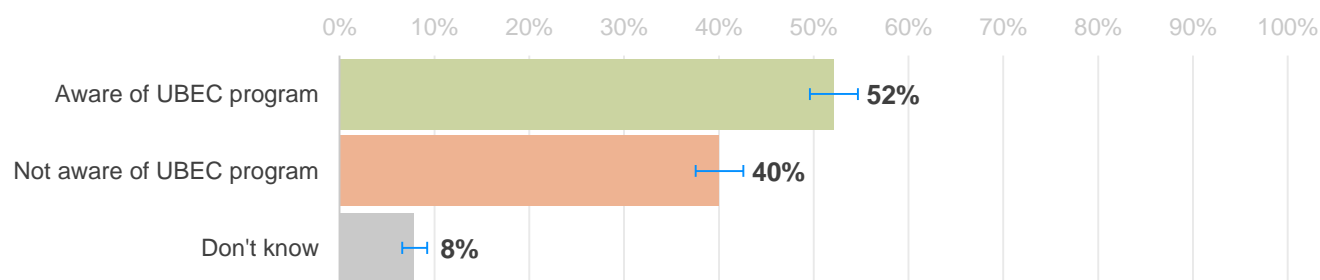


Exhibit 11: Parents' awareness of UBEC Intervention Fund²⁷

n=2,392 parents; 95% Confidence interval: 38–43% and 7–9%, respectively

Are you aware of the Government of Nigeria's Universal Basic Education Fund?



A pre/post survey of targeted school districts conducted by an On Nigeria grantee found parents' awareness of the fund to be even lower: More than 80 percent of parents and teachers were unaware the fund existed.²⁸ In qualitative interviews, parents, school officials, and SBMCs demonstrated severely limited knowledge about the UBEC Intervention Fund, its actors, and processes. With news media playing a potential role in increasing awareness, it is relevant to note that media monitoring showed very few published reports that cover the UBEC Intervention Fund. A grantee project tracking report noted that grassroots stakeholders are not aware of the chain of actors in UBEC project implementation.²⁹

The people at the basic and secondary education [level] don't even know what the government is supposed to provide for them, as well as [sic] their expectation from the government. Even when they know, they do not know the right means to channel the issues. Even with the creation of the School Based Management Committee (SBMC), they still do not have the means to state out their problems to the government. This gives room to corruption.

– Qualitative interview: Grantee CSO

²⁷ Source: On Nigeria 2018 telephone survey

²⁸ Source: Grantee Feedback Convening, November 2018

²⁹ Ibid.



Intended UBEC Collaboration Interim Outcomes

- **Bilateral/multilateral agencies and other key actors (including MacArthur Foundation)** leverage relationships to encourage UBEC and SUBEBs to “pick up” funds.
- **Oversight and coordination agencies (Bureau for Public Sector Reform, Bureau for Public Procurement), state governors, and CSOs** work in concert to ensure that UBEC and SUBEBs use the OCDS.
- **Cross-Cutting: Journalists/media and CSOs** share information about and collaborate on government anticorruption promises, activities, and wins in education.

Finding: Grantees are collaborating with each other, the media, and other stakeholders to strengthen “voice” actions and influence “teeth” actors to implement transparency and accountability practices (including the OCDS).

CSOs have increased their use of media to cover events and amplify messages, as well to enhance collaboration and capacity building.³⁰ Collaboration among CSOs, parent groups, and school representatives has strengthened monitoring of SUBEB contracting, and services and demands for improved accountability and transparency by UBEC and SUBEBs. Grantees reported collaborating among themselves, with journalists,³¹ and with state and community stakeholders over the last 2 years on activities such as town hall meetings, sensitization events, monitoring groups, data collection, and implementation of the OCDS.³² Examples of grantee and community collaboration efforts include: town hall meetings (Kaduna and Lagos) bringing together UBEC and SUBEB officials with community members; collaboration between large numbers of stakeholders for local-level monitoring efforts (Kaduna); and communities calling on state and federal government to include them in UBEC Intervention Fund project launches and monitoring activities.

In all our town hall meetings, we sometimes even tell government to take ownership and do the invite while we provide them with the support... We have the contractors who represent the private sector to have people interface with the contractor. [We engage] people, government and media to have that robust discussions. – Grantee CSO, Kaduna

³⁰ Grantee annual report, 2016 and 2017; This Day. 2017. *65% of Nigerian Schools Lack Electricity*; Sahara Reporters. 2017. *Rights Group Launches Project To Track UBE Spending*.

³¹ Grantee mentions in the media related to UBEC remained at a similar, low level for both 2016 and the first half of 2018, at 23 percent (of 146 mentions) and 18 percent (of 42 mentions), respectively. Document review provided evidence of collaboration between CSOs and the media through one grantee report and two media articles.

³² Grantee e-newsletter: May 2018; The Nation. 2017. *Group urges Nigerians to make leaders accountable*; Progressive Governors Forum. 2017. *65% of Nigerian Schools Lack Electricity*; Grantee annual report 2017; Africa Prime News. 2018. *Nigerian NGO Supports Kaduna Community Track N165m UBEC Projects*.



Intended UBEC Long-term Outcomes

- **Citizens in targeted states** demand UBEC resources for their children’s schools.
- **Actors along the supply chain for UBEC resources** ensure regular, reliable, and transparent flow and use of allocated funds to schools in targeted states.
- **UBEC-supported goods and services that have been hindered by corruption** are delivered to schools in targeted states.
- **Citizens in targeted states** have decreased tolerance for corruption related to UBEC resources.

Finding: Some emerging groups in Kaduna and Lagos states are demanding UBEC resources for their children’s schools. However, there are continuing concerns among CSOs and parents in these states that frequent delays in UBEC Intervention funding puts the funds in jeopardy of being diverted. There are indications that parents in these states perceive UBEC Intervention Fund projects to be hindered by corruption.

Qualitative interview data indicated CSOs and parent groups in targeted states and schools are demanding enhanced UBEC Intervention Fund transparency, accountability, and improved goods and services. The national telephone survey sample of parents in target states was very small (19 in Kaduna and 9 in Lagos) due to the low percentage of parents aware of the UBEC Intervention Fund. In Kaduna, 29 percent of parents (95% confidence interval: 13–53%) contacted school staff, a parent association/parent-teacher association (PTA)/SBMC, or government official to demand UBEC resources for their child’s school, while 36 percent of parents in Lagos (95% confidence interval: 12–70%) reported doing so.

Qualitative data indicate concerns about flow and use of funds, although the sample of schools is too small to generalize within the two targeted states. For example, grantees noted variation between states regarding how funds flow through the UBEC Intervention Fund and who is making decisions. While SUBEBs control the funds and make contractor decisions, LGAs in some states may pressure or influence SUBEBs with favors to affect contractor selections and timing of projects.

It is the Local Government Education Authority (LGEA) that knows about the funding allocation. You can ask the Education Secretary. – Qualitative interview: LGA official

Some CSOs expressed concerns during qualitative interviews that UBEC Intervention Fund project funds may be diverted to other purposes. They believe this might happen if state matching funds are not submitted in a timely way, and their state might never receive those funds for an approved plan.

Parents of schoolchildren in Kaduna and Lagos presume that corruption hinders UBEC Intervention Fund goods and services. Sample sizes are very small, but national telephone survey data in Kaduna indicated that 58 percent of parents (95% confidence interval: 34–78%) perceive corruption to hinder delivery of goods and services; 75 percent of parents in Lagos (95% confidence interval: 38–94%) also stated this perception. While the confidence interval was large, the data suggest that more than a third of parents in Kaduna and Lagos consider corruption to hinder delivery of goods and services to their children. Qualitative interviews in targeted states provide mixed reviews of construction funded by the UBEC Intervention Fund, with roughly half of respondents from schools that received

construction expressing satisfaction with the quantity and quality of supplies used and the construction itself.

Where funds are accessed, implementation sometimes takes forever. You access funds for 2016, but you are just implementing that of 2014 (two years behind). Kaduna State is on point with delivery of the projects that we monitor. The only challenge is that the quality of the products is poor. – Grantee CSO, Abuja

Data regarding levels of tolerance among parents in targeted states were inconclusive due to small sample sizes and the variability in responses.



Intended UBEC Impacts

- **Citizens across Nigeria** demand UBEC education resources for their children.
- **Actors along the supply chain for UBEC resources across Nigeria** ensure regular, reliable, and transparent flow and use of allocated funds to schools.
- **UBEC-supported goods and services that have been hindered by corruption** are delivered to schools across Nigeria.
- **Citizens across Nigeria** have decreased tolerance for corruption related to UBEC resources.

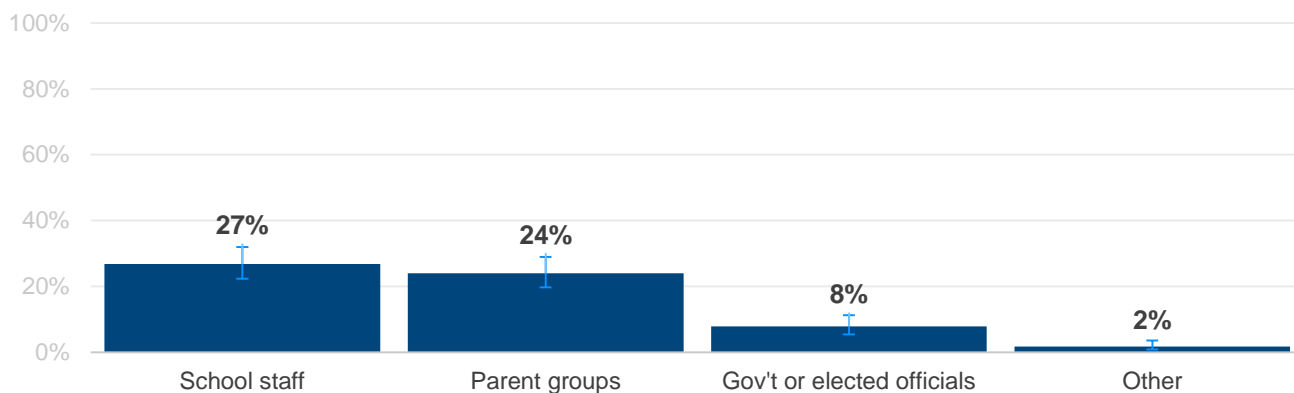
Finding: It is too early to tell whether shifts in norms are happening, but about a third of parents nationwide reported demanding improvements in UBEC Intervention Fund goods and services, primarily by contacting school staff or parent groups. Most parents and school representatives perceive that corruption within the UBEC Intervention Fund hinders funding flows, as well as delivery of goods and services that meet contract standards.

National-level telephone survey data indicate that 33 percent of parents³³ (95% confidence interval: 28–38%) have contacted official(s) over the past 12 months to demand UBEC services they believe their child’s school should be receiving. Parents most frequently direct these demands to school staff, PTAs, and SBMCs (see Exhibit 12).

³³ National telephone survey respondents eligible to answer questions about the UBEC Intervention Fund were parents with a child in public primary or junior secondary school who knew of the UBEC Intervention Fund and that their child’s school was targeted to receive resources from the Fund.

Exhibit 12: Groups parents contacted to demand UBEC resources over the past 12 months

(n=539 parents nationally)



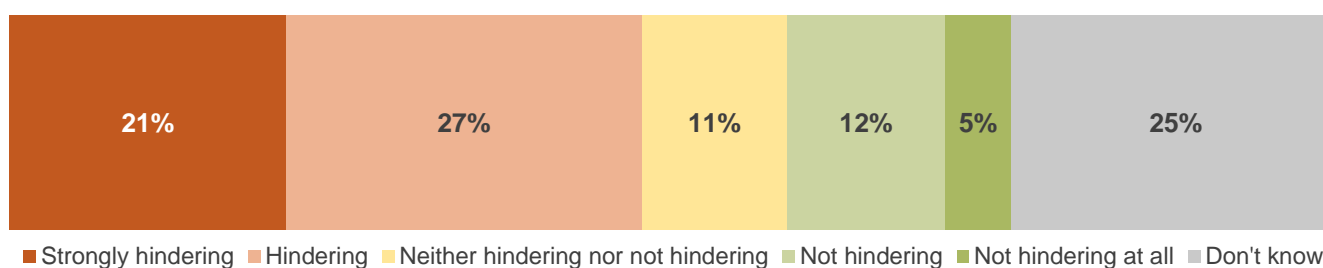
Source: On Nigeria 2018 telephone survey

Although national-level data on actions taken by non-target states are not available, nationwide media coverage has led local government education authorities outside of targeted states to call grantees for more information. Several grantees at the November 2018 convening noted their radio programs receive callers from outside targeted states who are interested in UBEC issues.

Citizens' perceptions of the degree to which corruption is affecting UBEC goods and services showed that approximately 48 percent (95% confidence intervals: 40% to 56%) of parents who knew their children were in schools targeted for UBEC funds viewed corruption as "strongly hindering" or "hindering" UBEC services (Exhibit 13).

Exhibit 13: Parental perceptions of corruption affecting UBEC services

(n=539)



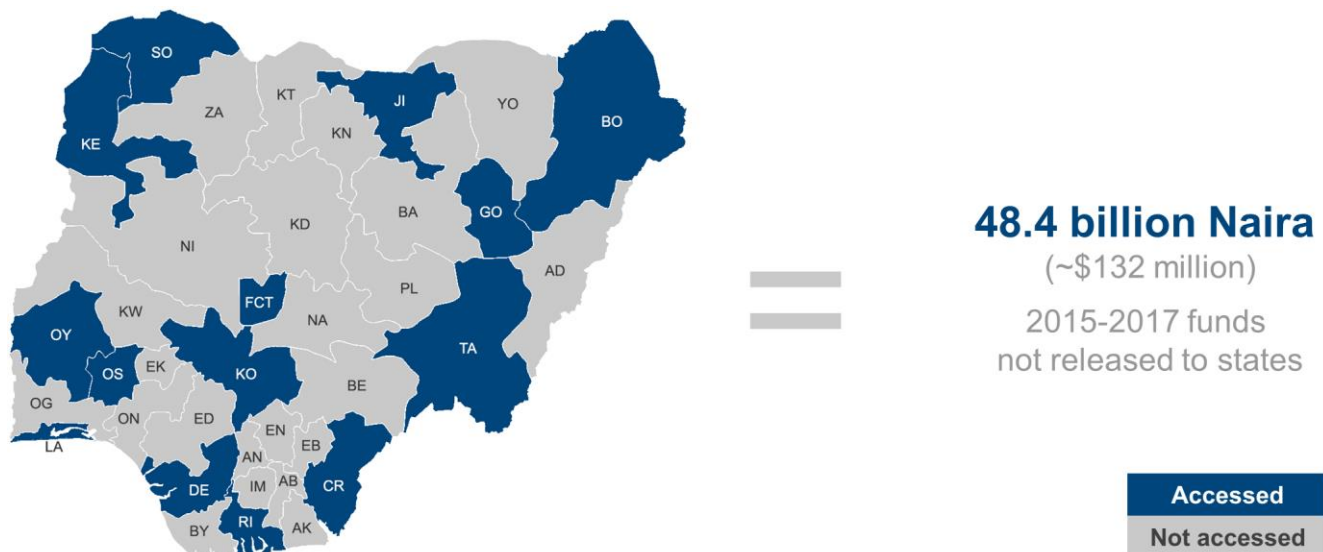
National telephone survey analysis also disaggregated parental tolerance of different forms of corruption in the UBEC Intervention fund, with 42 percent (95% confidence intervals: 38–46%) of respondents reporting that UBEC parents are "tolerant" or "very tolerant" of favoritism in contracts, school selection, diversion of funds before they reach schools, and unfinished or poor-quality projects.

4.1.5 Changing Landscape (2017–2018)

As of September 2018, only 14 of 37 states had received 2017 UBEC funds (Exhibit 14). Six states—Abia, Bayelsa, Enugu, Kwara, Ogun, and Plateau—have not received any funding for the past 3 years. Reasons for some states’ lack of access to UBEC Intervention Fund project funds are unclear, although CSO representatives, school staff, and parents interviewed as part of the evaluation suggested other state priorities (e.g., security or economic hardship), lack of state-level political will, and diversion of funds (money raised ostensibly for UBEC matching funds used for other purposes).



Exhibit 14: States accessing UBEC Intervention Fund project funds for the 2015–2017 period



Source: UBEC website 2018: UBEC not-accessed matching grant from 2015 to 2018 as of September 11, 2018

A recent senate act empowered the National Assembly to waive some or all of the state matching fund requirements on an “as needed” basis,^{34,35} which could speed up distribution of funds to states. However, according to the current education secretary Adama Adamu, a present Supreme Court ruling makes such waivers illegal.³⁶

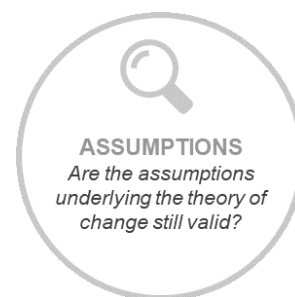
³⁴ Suleiman, A. *Senate passes Free, Compulsory Education Bill*. The Nation, August 3, 2017. <http://thenationonlineng.net/senate-passes-free-compulsory-education-bill/>

³⁵ Sunday, E-A. *UBEC’s N51b lying fallow as states fail to access fund*. The Guardian – Nigeria. October 21, 2018. <https://guardian.ng/news/ubecs-n51b-lying-fallow-as-states-fail-to-access-fund/>

³⁶ Naija247news. *UBEC’s N51b lying fallow as states fail to access fund*. Vanguard. October 22, 2018. <https://naija247news.com/2018/10/22/ubecs-n51b-lying-fallow-as-states-fail-to-access-fund/>

4.1.6 Assumptions

The On Nigeria UBEC theory of change rests on a number of assumptions, including that sufficient resources exist at the national level to fund states, and that political will exists at both federal and state levels to ensure timely distribution of funds and transparent management systems. Funding does appear to have been appropriated and set aside with UBEC each year. State SUBEBs are required to provide UBEC with an annual State Action Plan for funds and a description of how funds were used the previous year, as well as raise 50-percent matching funds to qualify for UBEC Intervention Fund monies. Qualitative interview data in Kaduna and Lagos states indicate that states lack the political will to complete these tasks, thereby limiting these states’ receipt of funds. Additionally, SUBEBs in states receiving funds appear slow in moving projects along once funds have been received.



Other assumptions predicating success through the On Nigeria theory of change relate to the capacity and willingness of UBEC and SUBEBs to install and use transparent monitoring data platforms, and appropriately monitor and manage the implementation of their state’s action plans. While one On Nigeria grantee set up an OCDS called the Budeshi platform, it is not yet clear that there is the political will to implement, keep up-to-date, and publicly share data, using such a system. Even though UBEC has taken initial steps—pilot-tested and initiated development of an OCDS implementation plan—interviewed CSOs suggest UBEC and SUBEB personnel lack capacity to successfully implement and use an OCDS database.

Exhibit 15: Level of assumption confirmation

Confirmed: ; Mixed: ; Rejected: ; Insufficient Evidence:

Assumption	Level of Confirmation
UBEC and SUBEBs have the political will to address long-standing government accountability issues.	
The federal government has funds available to distribute through UBEC.	
Use of the OCDS is effective at reducing corruption.	
New state governments (in addition to Kaduna and Lagos) “pick up” their federal UBEC allocations, provide matching funds, and distribute the funds throughout state educational systems.	
SUBEBs and school administrators in Kaduna and Lagos are responsive to grantees, CSOs, and parents.	
State officials and school administrators have adequate management skills, processes, and resources or receive relevant technical assistance to manage the program effectively and efficiently.	
UBEC and SUBEBs assign human resources to OCDS and funds monitoring. SUBEBs implement OCDS. Grantees contribute to transparency and accountability in previous systems until OCDS is operational.	

4.1.7 Summary and conclusions for the UBEC Module in 2018





Bureaucratic and political inertia appears to continue to hamper transparency and accountability progress within the UBEC Intervention Fund. Additionally, parents, school officials, government officials, and some CSOs have limited awareness and understanding of the program itself and its processes, making it harder for them to effectively demand resources and monitor the processes. Nearly half of parents of eligible schoolchildren perceive corruption to hinder delivery of UBEC Intervention Fund goods and services.

Despite challenges, many aspects of the On Nigeria strategy are working. Collaborative, innovative efforts by grantee CSOs working across local stakeholder groups (e.g., community leaders, school officials, parent and school groups) and with SUBEBs are showing nascent signs of improvement. This is evidenced in increased awareness, improved monitoring capacity, and intensified monitoring efforts in targeted states, along with incipient efforts to bring transparent contracting into place. Still, inertia for this program, potentially related to ingrained practices, translates into slower initial changes. Exhibit 16 summarizes progress in the UBEC module (shown in yellow or green status for each UBEC outcome).




Although progress is slow, the window of opportunity still exists for UBEC, and new opportunities are emerging at federal and state levels, such as open contracting, and access to funding.

Exhibit 16 also indicates where the 2018 data were inadequate to reveal progress for some outcomes. Data on quantity and quality of UBEC Intervention Fund implementation are limited and no vendor-level data have been collected, making it difficult to discern progress in improved flow and use of funds.




Exhibit 16: UBEC outcomes and progress

	Substantial progress: Clear signs of movement since the beginning of On Nigeria
	Moderate progress: Some momentum visible since the beginning of On Nigeria
	No progress or regression: No indications of movement since the beginning of On Nigeria or a worsening of the situation
	Inadequate or no data available to assess progress





Interim Outcomes – Capacity Building: Do “voice” and “teeth” actors have the capacity and knowledge they need?

-  CSOs, SBMCs, and journalists/media are aware of entitlements, government funds, and processes related to UBEC and SUBEBs.
-  CSOs, SBMCs, and journalists/media know how to monitor, investigate, and advocate for action on OCDS and transparent flow of funds.
-  UBEC and targeted SUBEBs know how to use the OCDS.





Interim Outcomes – Collaboration: Are actors collaborating to leverage success and build pressure for change?

-  Bilateral/multilateral agencies and other key actors (including the MacArthur Foundation) leverage relationships to encourage UBEC and SUBEBs to “pick up” funds.
-  Oversight and coordination agencies (Bureau for Public Sector Reform, Bureau for Public Procurement), agencies, state governors, and CSOs work in concert to ensure that UBEC and SUBEBs use OCDS.
-  Cross-Cutting: Journalists/media and CSOs share information about and collaborate on government anticorruption promises, activities, and wins in education.





Interim Outcomes – “Voice:” Are “voice” actors engaging in advocacy and monitoring?

-  More CSOs and SBMCs demand/advocate for transparency and accountability related to UBEC and SUBEBs.
-  CSOs and journalists/media monitor the flow of UBEC and SUBEB funding.
-  CSOs and journalists/media use information from OCDS and other sources to educate parents and school personnel about education funds and policies.
-  CSOs, SBMCs, school personnel, and journalists/media monitor the delivery of promised UBEC-supported education resources and demand UBEC education resources for their schools.





Interim Outcomes – “Teeth:” Are “teeth” actors operating transparently and holding others accountable?

-  UBEC monitors and ensures appropriate use of funds by SUBEBs.
-  Targeted SUBEBs pilot, adopt, and roll out the OCDS.
-  UBEC, targeted SUBEBs, and vendors provide accurate information about procurement and appropriation processes to the public, CSOs, media, and relevant government agencies.
-  UBEC sanctions SUBEBs and vendors for inappropriate use of funds.

Long-Term Outcomes: Are improvements institutionalized and social norms shifted in targeted states?

-  Citizens in targeted states demand UBEC resources for their children's schools.
-  Actors along the supply chain for UBEC resources ensure regular, reliable, and transparent flow and use of allocated funds to schools in targeted states.
-  UBEC-supported goods and services that have been hindered by corruption are delivered to schools in targeted states.
-  Citizens in targeted states have decreased tolerance for corruption related to UBEC resources.

Impacts: Are improvements institutionalized and social norms shifted nationwide?

-  Citizens across Nigeria demand UBEC resources for their children.
-  Actors along the supply chain for UBEC resources across Nigeria ensure regular, reliable, and transparent flow and use of allocated funds to schools.
-  UBEC-supported goods and services that have been hindered by corruption are delivered to schools across Nigeria.
-  Citizens across Nigeria have decreased tolerance for corruption related to UBEC resources.

4.2 Home Grown School Feeding Program

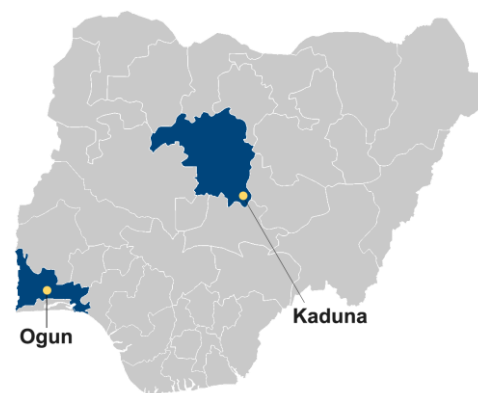
4.2.1 Background

The National Home Grown School Feeding (HGSF) Program was a key feature of President Buhari’s 2015 campaign. This program has a dual goal of providing school lunch for 5.5 million public primary school students and supporting local agriculture. National HGSF Program meal delivery involves a supply chain spanning numerous actors, such as government officials, local farmers, aggregators,³⁷ cooks, and school personnel; this creates numerous opportunities for corrupt practices.

The National HGSF Program was introduced nationally in December 2016, and is newer than the programs other On Nigeria modules are working with. The design of the national-level program was largely based on a similar school feeding program running in Osun state since 2006.³⁸ The model had been piloted unsuccessfully in 11 other states³⁹ and Abuja Federal Capital Territory (FCT) prior to 2016.

4.2.2 HGSF Theory of Change

On Nigeria’s HGSF strategy works toward building increased transparency and accountability throughout the HGSF supply chain to create and maintain consistent, quality meal delivery for schoolchildren and effective use of public resources, as summarized in Exhibit 17 (and shown in more detail in Annex 1). Efforts of the On Nigeria strategy focus on schools in select LGAs of the target states of Kaduna and Ogun, as well as on advocacy to state officials to spread good transparency and accountability practices to other schools. Success in long-term outcomes will be demonstrated in Kaduna and Ogun if (1) citizens demand HGSF program services their children should be receiving and have decreased tolerance for corruption related to HGSF services; (2) HGSF actors implement corruption-reduction practices and use HGSF program funds according to guidelines and contractual obligations across Nigeria; and (3) schoolchildren receive HGSF benefits that have been hindered by corruption. Additionally, SBMCs, school personnel, CSOs, and journalists/media will effectively monitor meal delivery and demand the HGSF services schoolchildren should be receiving.

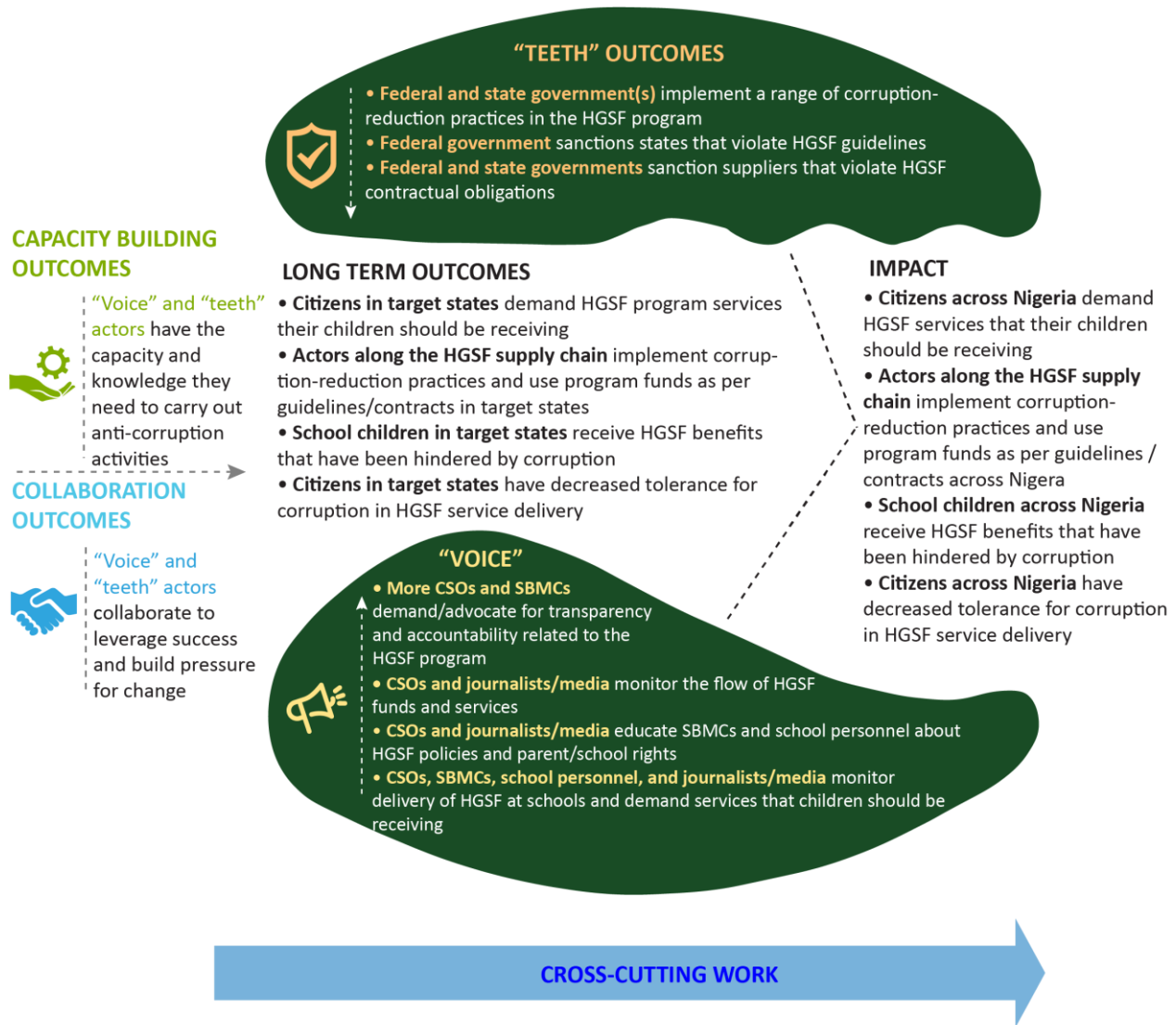


³⁷ In the National HGSF Program, *aggregator* refers to people who supply food to cooks for use in meal preparation. Most often, these are suppliers of protein, typically eggs in Kaduna and fish or meat in Ogun. In Kaduna, aggregators also supply the juice and biscuits children receive as their Friday meal.

³⁸ Premium Times. 2017. *SPECIAL REPORT: How Buhari administration’s school feeding programme increases pupil enrolment amidst challenges.*

³⁹ Other pilot states were Bauchi, Cross River, Enugu, Imo, Kano, Kebbi, Kogi, Nasarawa, Rivers, and Yobe.

Exhibit 17: : HGSF theory of change



For the HGSF module, On Nigeria’s initial efforts have targeted nine grants totaling \$4.63 million to organizations in Kaduna and Ogun, most of which began their funding in September 2017. These grants focus on 8 percent of schools in Kaduna and 9 percent of schools in Ogun.⁴⁰

As with the strategy for the UBEC module, the HGSF theory of change focuses on the four core components of the “sandwich” strategy. Grantees work to raise citizens’ awareness of the National HGSF Program entitlements and strengthen capacity to monitor the program; all grantees work to foster collaboration between CSOs and state governments, and support information sharing between CSOs (both grantees and community groups) and journalists. These efforts contribute to strengthened “voice” outcomes where CSOs, communities, school officials, parent groups, and other

⁴⁰ Sources: State coverage rates were calculated using lists of schools On Nigeria grantees provided; and for Ogun State, a list of schools LGA from the Ogun State Universal Basic Education Board provided.

local-level actors monitor service delivery, and advocate for transparency and accountability in the HGSF program. Two On Nigeria grantees also provide technical support to national- and state-level HGSF “teeth” actors to achieve better implementation of corruption-reduction practices, such as sanctioning actors who violate obligations and ensuring transparent management and procurement. Together, these activities are expected to ensure children receive—and citizens demand—the HGSF meals they should be receiving, with actors along the supply chain implementing corruption-reduction practices and using HGSF funds in a transparent and accountable manner.

By the final strategy review presentation in March 2020, success in the HGSF module will be achieved if: (1) HGSF officials have and use systems to increase accountability and transparency in the flow and use of HGSF funds; (2) CSOs actively monitor and document whether eligible students are receiving meals meeting timing, consistency, and quality standards; (3) actors along the HGSF chain use and participate in accountability systems; (4) corruption-related kinks in the system are being resolved; and (5) journalists report on HGSF in Kaduna, Ogun, and other states.

4.2.3 Landscape at Baseline (2015–2016)

The baseline period for the On Nigeria efforts related to HGSF covers 2015 through the start of On Nigeria grants in August 2016. Because the current version of HGSF is a new national program that launched concurrently with On Nigeria, baseline data from before the strategy began are extremely limited or nonexistent. Corruption in the sector did not appear to play a role in media attention—in 2016, HGSF keywords made up less than one percent of all corruption and anticorruption media mentions related to On Nigeria.

Nigerian states had experienced varying levels of National HGSF Program implementation at baseline. For example, while implementation of the HGSF program was piloted in 12 states and FCT in 2006, the program was suspended in 2008 in all states except Osun due to funding constraints and changes in government administration. While a literature review indicates that there were some challenges to ensure adequate monitoring and community sensitization,⁴¹ it is unclear whether this suspension was due to corruption or more general inefficiency; document review seems to better support the latter. Osun was able to continue implementation because it maintained strong political will, financial disbursement systems, and food procurement practices.⁴²

State rollout of the National HGSF Program has expanded over time, and all states that currently implement HGSF, except Osun and Kaduna, joined the program on a rolling basis starting in December 2016. Kaduna’s state HGSF program was launched a year earlier, in January 2016, although document review sources suggest that the state government temporarily halted HGSF

⁴¹ National Home Grown School Feeding Programme. 2014. *Nigeria Home Grown School Feeding Communique: Rethinking school feeding in Nigeria*; National Home Grown School Feeding Programme. 2014. *A Case Study on the School Feeding Programme in Kano State*.

⁴² Premium Times. 2017. *SPECIAL REPORT: How Buhari administration’s school feeding programme increases pupil enrolment amidst challenges*.

activities in January 2017, claiming that the Office of the Vice President—which oversees HGSF program operations—had not fully reimbursed the state government for its expenses.⁴³ Kaduna, therefore, only began implementation in July 2017.⁴⁴

4.2.4 Early Progress and Momentum (2017–2018)



Intended HGSF “Teeth” Interim Outcomes

- **Federal and state government(s)** implement corruption-reduction practices in the HGSF program by establishing and operationalizing designated structures, inclusive implementation committees (e.g., TAC), and inclusive monitoring/reporting frameworks.
- **Federal government** sanctions states that do not comply with HGSF guidelines.
- **Federal and state governments** sanction suppliers violating HGSF contractual obligations.

Finding: Multiple anticorruption measures introduced at the federal level have had some success, although more remains to be done at all levels.

Since the inception of the National HGSF Program in December 2016, federal political will to combat corruption in HGSF has contributed to the introduction of several “teeth” measures. Evidence from grantee data⁴⁵ and qualitative interviews indicates that the government has created both a federal technical assistance committee and multisectoral state implementation committees to support monitoring and implementation for each state that plans to join the program. Ogun is the only state with its own HGSF advisory committee; the others monitor through the Ministry of Education. While one grantee reported meeting with the Kaduna state committee in their 2017 annual report, both grantee annual reports and qualitative interviews with school officials, SBMCs, CSOs, and government officials indicate that the Kaduna committee may not be effective. Girl Child Concern’s 2018 baseline assessment among 60 schools in Kaduna also suggested absence of an effective state committee.

In practice[,] however, findings reveal that th[is] 30-man State Technical Committee (STC) on the school feeding put in place to coordinate the feeding programme at the state level seem[s] less effective in performing its role... [M]embers of the STC mentioned hardly ever meeting to [address] issues around coordination of the HGSFP in the state [of Kaduna].
– Girl Child Concerns, 2018 Baseline Assessment Report

In terms of enforcement action, document review did not reveal evidence of the federal government sanctioning states that do not comply with HGSF guidelines; however, in an interview, one federal government official described sanctioning Ebonyi state for corruption. Only two qualitative respondents reported incidents of government sanctioning corrupt officials at the LGA levels.

⁴³ Ibid.

⁴⁴ The Guardian. 2017. *School Feeding Programme: Hobbled by litany of constraints in pilot states*; Partnership for Child Development. 2016. *Global School Feeding Sourcebook: Lessons from 14 Countries*.

⁴⁵ Grantee annual report, 2016; Girl Child Concerns. 2018. *Baseline Assessment Report*.

Sanctioning of suppliers and vendors appears to be more effective, with government officials, particularly in Kaduna, reporting that vendors who default are removed from the program or appropriately penalized. Parents and SBMCs in Kaduna were also aware of vendor sanctioning, although nepotism and the recent introduction of direct vendor payment could restrict effective action.

Federal and state government officials also report collaborating with grantee CSOs and other program stakeholders to monitor service delivery. Qualitative interview respondents noted that because the program was new, it had been possible to embed anticorruption systems into HGSF program operations from the start.



Intended HGSF “Voice” Interim Outcomes

- **More CSOs and SBMCs** demand/advocate for transparency and accountability related to the HGSF.
- **CSOs and journalists/media** monitor the flow of HGSF funds and services.
- **CSOs and journalists/media** educate SBMCs and school personnel about HGSF policies and parents'/schools' rights.
- **CSOs, SBMCs, school personnel, and journalists/media** monitor the delivery of government-promised feeding programs at schools and demand the HGSF services their children should be receiving.

Finding: Local-level HGSF monitoring by parents, SBMCs, school officials, and CSOs is uneven but expanding.

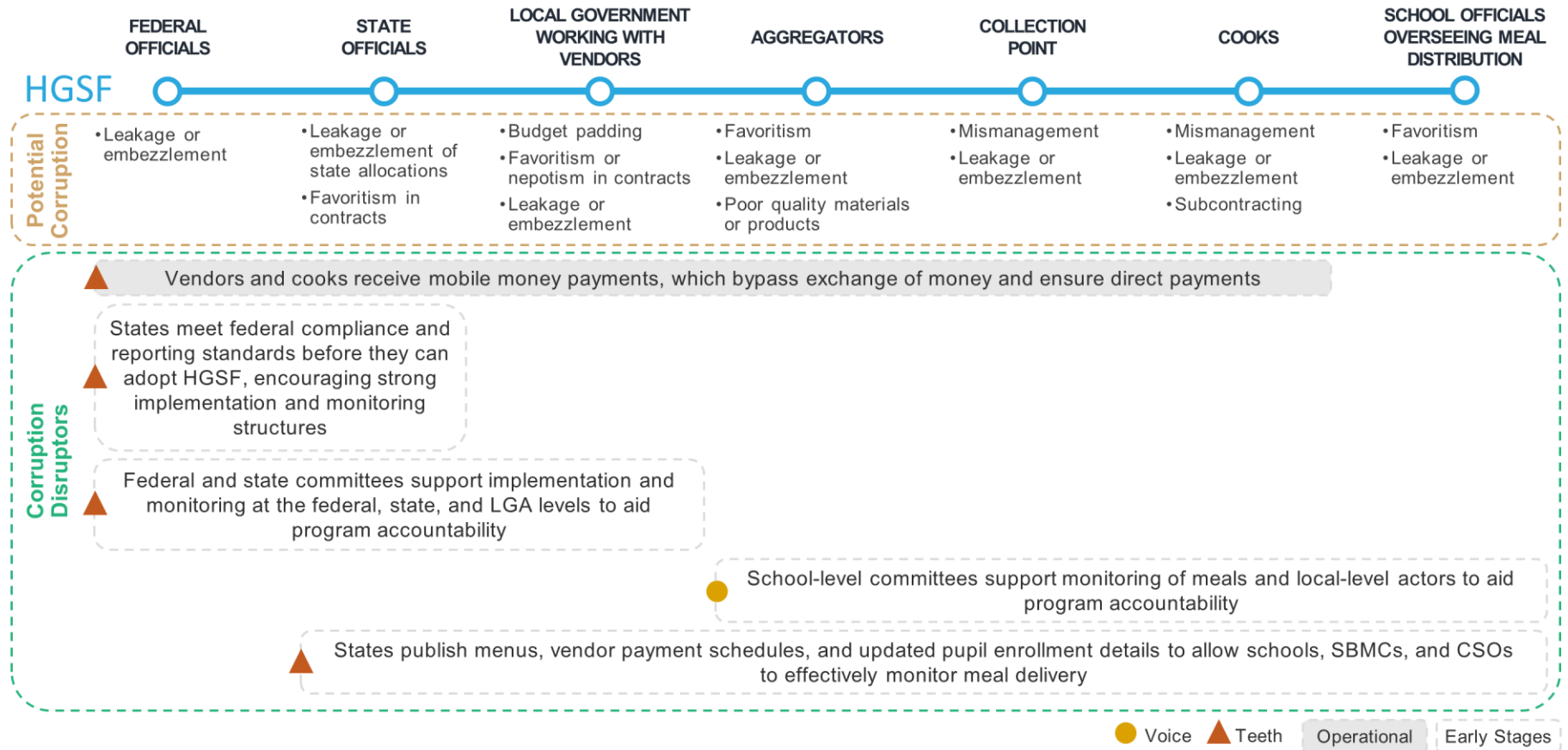
Monitoring of HGSF service delivery by local-level actors is a key component of the On Nigeria HGSF strategy. Qualitative interviews and document review provided evidence that parents, SBMCs, school officials, and grantees collaborate and use multiple data-gathering strategies to monitor HGSF cooks routinely, and admonish or report cooks for lapse in meal delivery. For example, PTAs, SBMC, and school representatives reported that they regularly monitor vendors, supervise deliveries, and taste food as ways of ensuring HGSF meal quality. Grantees collect their own data on meal delivery to triangulate with government data. When shortcomings are detected, school groups report them to local authorities, such as district permanent education secretaries, or directly warn the vendors.

The only data source we have is the quality assurance unit in charge of the HGSF. They have data like the list of schools and the number of children in each school. This helps us triangulate the real thing that is happening. You may have a record in the ministry that shows 1,000 pupils for a school while on getting to the school it is 800. – Grantee CSO, Kaduna

However, data suggest that there is significant variation in the ability of these stakeholders to effectively monitor HGSF meals based on knowledge and resource capacity (see the next section). Note that in 2018, data were not able to fully describe the extent of monitoring coverage in On Nigeria HGSF program areas; instead, they focused on the quality of existing monitoring.

Overall, several “voice” and “teeth” corruption disruptors are beginning to take shape in the HGSF service delivery chain, as summarized in Exhibit 18. These include disruptors that are both in early stages of development and those that are operational.

Exhibit 18: Disruptors affecting the HGSF module corruption chain





Intended HGSF Capacity-Building Interim Outcomes

- **CSOs, SBMCs, and journalists/media** are aware of entitlements, government funds, and processes related to the HGSF.
- **CSOs, SBMCs, and journalists/media** know how to monitor, investigate, and advocate for transparent procurement and implementation of HGSF services.
- **State governments** know how to reduce the risk of corruption in feeding programs.

Finding: CSOs, SBMCs, and parents lack key information about how the HGSF program functions, which inhibits their ability to monitor it. Grantees have started to build capacity of state officials, food vendors, and community members.

Qualitative interviews revealed that one major barrier to effective monitoring is that school officials, SMBC representatives, and parents lack basic information about the HGSF program, including key aspects of its operations, processes, and roles. These include knowledge of the existence of technical advisory committees and state HGSF advisory committees, as well as how HGSF program funding works. Grantees reported organizing training of state officials in five states (including the target states of Kaduna and Ogun), food vendors in Lagos, and community members in Kaduna to support efficiency, transparency, accountability, and sustainability of the HGSF program.⁴⁶ For example, two grantees indicated that they were training local community members to monitor the National HGSF Program at school or local levels in Kaduna and Ogun states.⁴⁷ Document review suggested that the ability of CSOs, SBMCs, and journalists/media to monitor HGSF meals has improved.

In addition to knowledge and awareness capacity limitations, at least one grantee noted that a lack of resource capacity affects the ability of community groups to monitor the HGSF program. Grantee Girl Child Concerns reported in their 2018 baseline assessment that among 60 schools in Kaduna, interest in local monitoring existed, but lack of funds restricted parents' ability to travel to schools and provided another barrier to effective monitoring at the local level.⁴⁸



Intended HGSF Collaboration Interim Outcomes

- **Bilateral/multilateral agencies and other key actors (including the MacArthur Foundation)** leverage relationships to encourage states to enroll in the HGSF.
- **State governments and CSOs** coordinate in monitoring HGSF implementation.
- **Journalists/media and CSOs** share information about the government's HGSF anticorruption promises, activities, and wins.

Finding: There are some instances of government officials collaborating with CSOs to monitor and improve HGSF implementation, but evidence of media engagement collaborating with HGSF and CSOs to share information in 2018 is limited.

⁴⁶ Two grantee annual reports 2017; Grantee validation exercise 2018.

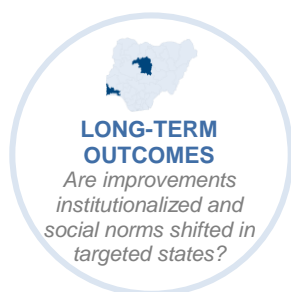
⁴⁷ Grantee annual report 2016; Grantee annual report 2017.

⁴⁸ Girl Child Concerns. 2018. *Baseline Assessment Report*.

Federal and state government officials appear to be working with CSOs to some degree to achieve HGSF program success and prevent corruption. For example, at least one grantee visited Kaduna and Lagos state leadership to discuss partnerships in 2017, while in a 2018 HGSF program operational manual, the federal government reaffirmed its commitment to work with relevant technical partners and all 36 states to address HGSF challenges.⁴⁹ Document review, grantee studies, and qualitative interviews also report that the government has encouraged CSOs to act as watchdogs for the program.

The NGOs we work with are the PTAs and SBMCs. We also have those from outside that have been coming to see what we are doing with respect to the school feeding program. When you see someone is trying to check on what you are doing, you will also want to do it better. We welcome NGOs because they help us to point areas of lapses so that we can improve. – Government official (state level), Kaduna

There appears to be little collaboration between anticorruption actors in the HGSF program and the media. Qualitative interviews with media organizations and some Kaduna parent and SBMC representatives suggest that collaboration between the media and CSOs, school officials, and parent representatives is limited, often due to a lack of funds to sponsor such activity. Like at baseline, media mentions of corruption in the HGSF module are extremely low, representing 2 percent (54) of all corruption and anticorruption reporting related to On Nigeria in 2018. However, the latter evidence could indicate either low levels of corruption or low levels of collaboration.



Intended HGSF Long-Term Outcomes

- **Citizens in targeted states** demand HGSF program services their children should be receiving.
- **Actors along the supply chain** implement corruption-reduction practices and use HGSF program funds according to guidelines and contractual obligations in targeted states
- **School children** receive HGSF benefits that have been hindered by corruption.
- **Citizens in targeted states** have decreased tolerance for corruption related to HGSF services.

Finding: Stakeholders appear generally positive about meal quality and quantity in the target states of Kaduna and Ogun, and cite corruption-reduction practices.

In general, samples for national telephone survey data for On Nigeria HGSF states were very small (75 in Kaduna and 33 in Ogun) due to the limited number of parents who indicated that their child receives HGSF meals. Of these parents, a minority reported demanding HGSF services for their children when they felt these services were not satisfactorily provided. In Kaduna, 19 percent of parents (95% confidence interval: 11–31%) contacted school staff, a parent association/PTA/SBMC, or government official at least once in the last year about meals not provided or quality of meal at their child’s school, while 35 percent of parents in Ogun (95% confidence interval: 14–64%) reported doing so.

⁴⁹ Today Nigeria. 2017. *Federal govt working to plug holes in schools' feeding programme.*

In qualitative interviews related to implementation of transparency and accountability practices, CSOs, parents, school representatives, and government officials at all levels tended to focus more on factors that support anticorruption efforts in the HGSF program than those inhibiting them. For example, SBMCs, school officials, parents, government officials, and CSOs the most frequently credited direct vendor payments—and in some cases, advance payments—with ensuring the timely, appropriate release of funds in the HGSF supply chain. Document review also reported that bank verification numbers and direct vendor payments help prevent embezzlement and fund leakages.

A significant milestone now is that... vendors [or cooks] are now being paid directly to avoid being short-changed by third part[ies]. – Qualitative interview, 2018: Grantee CSO

One grantee also cited the centralization of the new National HGSF Program under the Office of the Vice President as a facilitator of meal quality.

In qualitative interviews, a broad range of HGSF respondents also report that meals are most often delivered on time, reach all or most of the targeted pupils, and are of good or satisfactory quality. National telephone survey data coincide with these data. While sample sizes are small (65 in Kaduna and 13 in Ogun) and confidence intervals large, 51 percent of parents in Kaduna (95% confidence interval: 38–63%) and 46 percent in Ogun (95% confidence interval: 22–72%) stated their children were getting meals most days or every day. Meal quality was mixed—about half of 59 parent respondents in Kaduna stated quality was good or very good (51%, 95% confidence interval: 38–64%). Only nine parents responded in Ogun, which is too small of a number to report from.

There are instances, particularly in Ogun, when vendors failed to deliver because of payment delays. Some SBMCs and school officials reported that, at times, the quantity of food was small or insufficient. Some school officials in Kaduna reported problems with the delivery of juice and biscuits, both to be served on Fridays. Generally, CSOs, school officials, SBMCs, parents, and government representatives believe goods and services are flowing effectively. Among reasons for this are the centralized system, the advance and direct payments to vendors, and provision of cooking implements. Negative responses CSOs and SBMCs provided include instances of breaks in the program and aggregators' failures in the supply of protein and eggs to vendors. In terms of specific types of corruption, evidence from document review and qualitative interviews with parents, SBMCs, and CSOs described patronage and favoritism in the recruitment of cooks as a common form of corruption that often goes unchecked.

Grantees at the November 2018 convening noted that discrepancies between the number of children schools are expected to feed and the number actually fed are directly affecting perceptions of HGSF meal quality and quantity. For example, grantees reported that in Ogun state, in addition to children in primary grades 1 to 3 who are eligible for HGSF, schools often feed children from the community who are *not* enrolled in school. Similarly, in Kaduna, where schools are largely in rural areas, cooks often provide meals to students from all grades in a given school, decreasing the quantity of food provided to eligible children. This could explain evidence from the national telephone survey data that suggests that some children in grades 4 to 6 or in junior secondary school receive HGSF meals.

Some parents of schoolchildren in Kaduna and Ogun perceive corruption in the HGSF program. Sample sizes are very small, but national telephone survey data in Kaduna indicated that 38 percent of parents (95% confidence interval: 26–51%) perceived corruption to hinder goods and services, while 31 percent of parents in Ogun (95% confidence interval: 12–60%) stated this perception. The sample size of respondents for survey questions about tolerance was less than 25, and therefore, not appropriate for analysis at the state level.



Intended HGSF Impacts

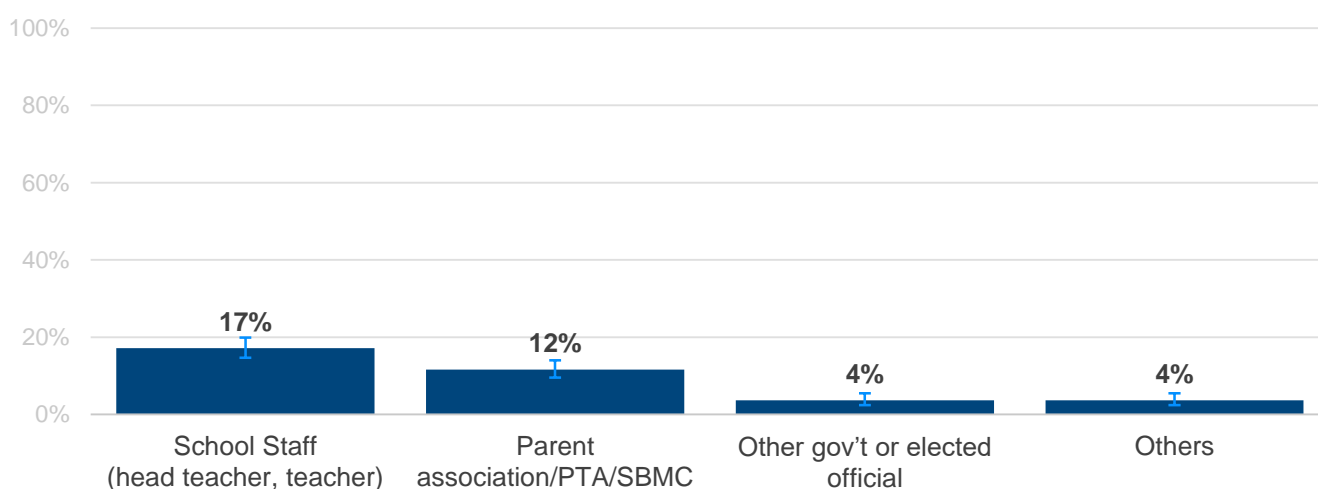
- **Citizens across Nigeria** demand the HGSF services their children should be receiving.
- **Actors along the supply chain** implement corruption-reduction practices and use HGSF program funds according to guidelines and contractual obligations across Nigeria.
- **School children across Nigeria** receive HGSF benefits that have been hindered by corruption.
- **Citizens across Nigeria** have decreased tolerance for corruption related to HGSF services.

Finding: Across all HGSF states, a majority of parents report good quantity and quality of HGSF meals their children receive, while a fifth of parents have contacted someone to demand HGSF services their children should receive. About a third of parents who have primary school children eligible for HGSF feel that there is corruption in the HGSF program. Transparency and accountability efforts are too nascent to be institutionalized at this time.

Due to larger sample sizes, national-level data provide stronger evidence than state-level data when describing the results of the HGSF program. Overall, 20 percent of telephone survey respondents reported contacting someone to complain about the meal quality or quantity (95% confidence interval: 17%–22%), with complaints largely directed toward school staff (Exhibit 19).

Exhibit 19: Parents’ complaints about HGSF meals

(Categories not mutually exclusive; n=1,290 parents with a public primary school child eligible for HGSF and aware of the program)



Source: On Nigeria telephone survey, 2018

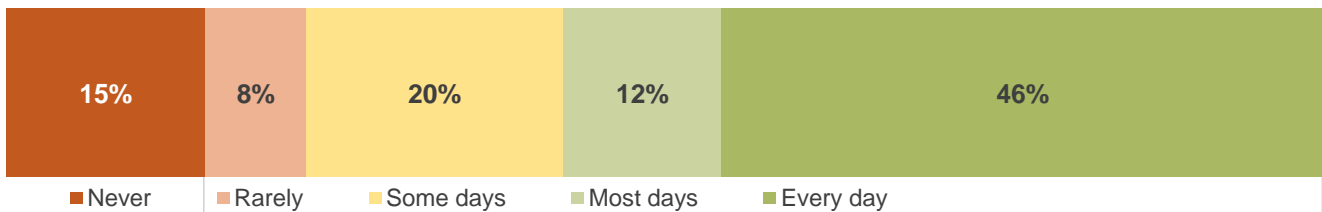
At a policy level, one interview with a CSO representative who works closely with the National HGSF Program and document review suggested that the program is taking measures to ensure that states have systems for accountability and transparency in place before service delivery is implemented.⁵⁰

[W]e tried to put that management system in place so that everything is systematized from the bottom level to the top... [Each state has] different players and different committees that make it work in that way. What we're saying is that "you need to work within a framework. You can do it your way, but you have to be accountable and do it within this framework." It seems to be working. We've held back from another six states or five states because we want to be sure that system is in place, the accountability is there. – Qualitative interview, 2018: Grantee CSO

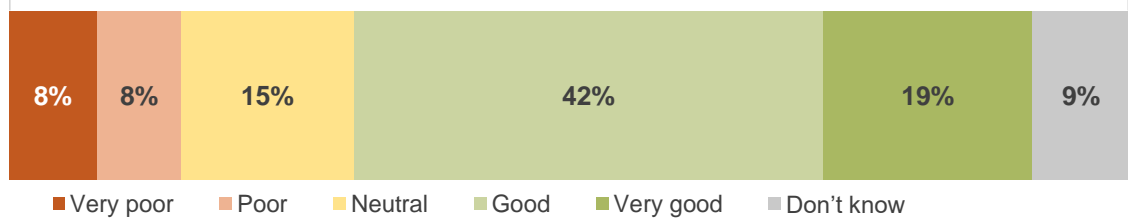
National-level HGSF data indicate that among parents of eligible primary schoolchildren who were polled, more than half reported that their child receives HGSF meals “every day” or “most days” (Exhibit 20). For those whose children received meals rarely or more often, 60 percent reported that HGSF meals were of “good” or “very good” quality (95% confidence interval: 56%–64%).⁵¹

Exhibit 20: Parents’ perceptions of quantity and quality of HGSF meals

In a week, how often does your child receive the HGSF meals they are supposed to receive? (n=1,155)



How would you assess the quality of the HGSF meals your child receives? (n=982)



Source: On Nigeria telephone survey, 2018

In general, perceived levels of corruption appeared lower in HGSF than the other service delivery modules (UBEC and electricity). National telephone survey data show that 36 percent of parents with primary school children eligible for HGSF meals believe there is corruption in the program, as seen in Exhibit 21 (95% confidence interval: 32%–39%), compared to 65 percent of electricity sector

⁵⁰ National Home Grown School Feeding Programme. *Nigeria Home Grown School Feeding Strategic Plan, 2016-2020.*

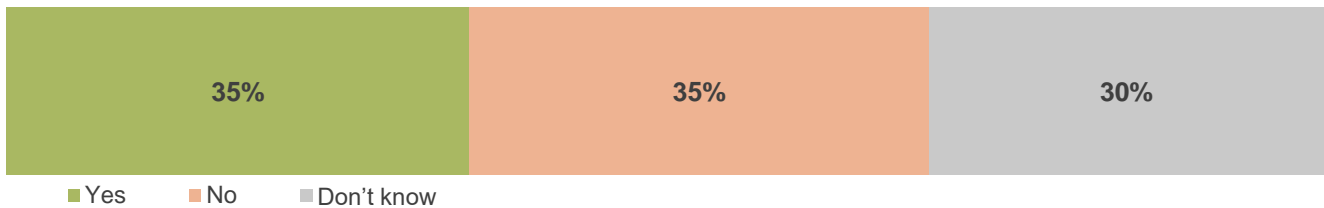
⁵¹ Note that there does appear to be some variation in parents’ awareness of the program, and perceptions of meal quantity and quality between states. For example, qualitative interviews indicate that some cooks in Ogun did not deliver meals because of payment delays. However, between the limited number of qualitative HGSF interviews and sample size of the national telephone survey, we were unable to differentiate between states more accurately.

customers (95% confidence intervals: 64%–67%) and 43 percent of UBEC parents (95% confidence intervals: 38–49%).

Exhibit 21: Perceptions of corruption

(n=1,155 parents with primary school children eligible for HGSF meals)

In your opinion, is there corruption in the HGSF program?



Source: On Nigeria telephone survey, 2018

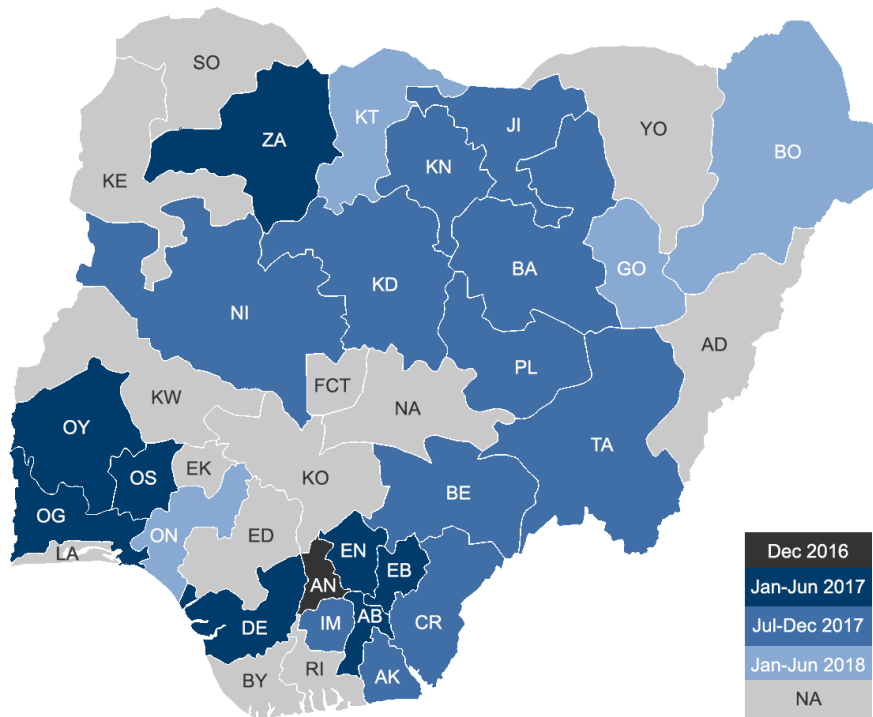
National telephone survey analysis also disaggregated parental tolerance of different forms of corruption in the HGSF system, with 32 to 37 percent of respondents reporting that HGSF parents are “tolerant” or “very tolerant” of diversion of funds/food by school staff or cooks, and that there is favoritism in contracts for supplies and diversion of funds at national or state level. In general, it is too early to tell whether shifts in norms are happening.

4.2.5 Changing Landscape (2017–2018)

The context for anticorruption work in the HGSF program has been relatively stable. In particular, state-level support for the HGSF program appears strong, as evidenced by the number of states that have joined the program. Data from the Office of the Vice President indicate that between December 2016 and August 2018, 24 states worked with the federal government to roll out the National HGSF Program (Exhibit 22).



Exhibit 22: National HGSF Program rollout by state and year (as of August 2018)



Source: Office of the Vice President, 2018

Three important contextual factors influence the HGSF program’s geographical reach. First, within states that participate in the National HGSF Program, the cost for providing meals for primary grades 1 through 3 is funded federally, but states have a choice about whether to allocate additional state funding to provide meals for students in grades 4 through 6.⁵² Secondly, document review and a qualitative interview with a grantee CSO indicate that states are brought onto the program only if they are able to meet key quality criteria, which the national HGSF team determines through meetings with state executives, scoping visits to assess current and potential state-level engagement, and workshops to plan for implementation.⁵³ Consequently, state rollout of HGSF is influenced by each state’s political prioritization of joining the program and capacity to implement the program at some level of quality. Finally, although 24 states had officially initiated the HGSF program by August 2018, grantees at the November 2018 convening reported significant variation in the extent of state implementation. For example, Girl Child Concerns noted in a 2018 baseline assessment that some schools in Kaduna were not participating in the program. Additional data on sub-state heterogeneity were not available as of November 2018.

Despite progress to date, evidence suggests that a number of actors along the supply chain could be inhibiting anticorruption progress in the HGSF program. In qualitative interviews, CSOs, international organizations, and local actors cited procurement as the area where corruption remains the most

⁵² National Home Grown School Feeding Programme. *Nigeria Home Grown School Feeding Strategic Plan, 2016–2020*.

⁵³ National Home Grown School Feeding Programme. 2017. *The Journey So Far*.

entrenched in the education sector in general. In the HGSF program, this manifests itself as non-meritocratic selection of vendors, bribery, theft of funds or procured goods, and other procedural violations. Many qualitative respondents in Kaduna believed politicians and education secretaries to be particularly responsible for patronage and nepotism in vendor recruitment. In an annual report, one grantee also noted that Kaduna and Lagos⁵⁴ state governments might be unwilling to cooperate and share information. Document review evidence also reported instances of cooks shortchanging children, and banks and sellers shortchanging cooks or cooks having difficulty opening bank accounts.

4.2.6 Assumptions

The On Nigeria HGSF theory of change rests on assumptions about states’ political will and responsiveness regarding the HGSF program, states’ and schools’ technical capacity to implement the program, and state and federal fund allocation and flow. While states have yet to fully adopt and expand the HGSF program, including contributing their own funds, the assumptions underpinning the module appear to have largely held over the period of 2016 to 2018. Strong political will, growing state adoption, and increasing capacity for program management and monitoring all suggest that there is ongoing potential for effective anticorruption efforts within the HGSF program.

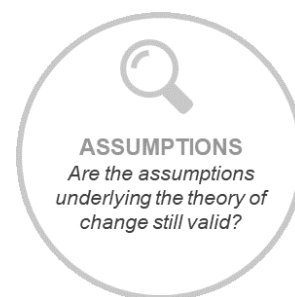


Exhibit 23: Level of assumption confirmation

Confirmed: ; Mixed: ; Rejected: ; Insufficient Evidence:

Assumption	Level of Confirmation
State and federal officials have the political will to address long-standing government accountability issues.	
States are signing onto and rolling out HGSF.	
States (Kaduna and Ogun) are responsive to grantees, CSOs, and parents.	
State officials and school administrators have adequate management skills, processes, and resources or receive relevant technical assistance to manage the program effectively and efficiently.	
States have their own funding available for their share of the HGSF and are willing to allocate it to this program.	
The federal government has funds available to distribute to the HGSF. (New assumption added in 2018; to be tested beginning in 2019.)	
The federal government allocates and distributes HGSF funds to the states. (New assumption added in 2018; to be tested beginning in 2019.)	

4.2.7 Summary and Conclusions for the HGSF Module in 2018

As a new national-level program, the National HGSF program appears to have the political will at the federal and state levels to keep corruption from taking root. Although implementation varies by

⁵⁴ Lagos was initially selected as a target state for the On Nigeria HGSF strategy.

state, a combination of “teeth” efforts (i.e., accountability checks) and “voice” activities (i.e., active participation of CSOs and parents) at the federal level and in Kaduna and Ogun have contributed to reduced risk of leakage and corruption in the National HGSF Program. Local community capacity to monitor and advocate for meal delivery is slowly increasing in Kaduna and Ogun, although the effectiveness of implementation and monitoring structures varies at all levels and stakeholders’ knowledge of the program could be strengthened. There is evidence of increasing coordination across the states, between state groups and the national coordination office, and among grantees—creating a nascent voice movement of monitors and networks that push openness and accountability. Initial long-term outcomes also appear to be encouraging: A majority of parents appear satisfied with HGSF meal quantity and quality, and numerous active and potential corruption disruptors along the service delivery chain offer hope of further progress. Exhibit 24 summarizes progress (shown in yellow or green status for each HGSF outcome).

The window of opportunity for anticorruption work in HGSF remains open: There is increasing momentum in “voice” activities, although effective “teeth” efforts might depend on continuing political will and advisory committee structures vary by state. These “teeth” efforts will need to be strengthened and expanded as the National HGSF Program continues to spread. Thus, On Nigeria’s work to reduce corruption (or the risk of corruption) in the HGSF program has demonstrated momentum and some encouraging early results.

Exhibit 24 also indicates where the 2018 data were inadequate to reveal progress for some outcomes. Certain data limitations exist for the HGSF module—some related to the reach of the program, and others to general data availability or sampling constraints for school-based qualitative data and the national telephone survey in target states.

Exhibit 24: HGSF outcomes and progress

■	Substantial progress: Clear signs of movement since the beginning of On Nigeria
■	Moderate progress: Some momentum visible since the beginning of On Nigeria
■	No progress or regression: No indications of movement since the beginning of On Nigeria or a worsening of the situation
■	Inadequate or no data available to assess progress

Interim Outcomes – Capacity Building: Do “voice” and “teeth” actors have the capacity and knowledge they need?

- 1 CSOs, SBMCs, and journalists/media are aware of entitlements, government funds, and processes related to the HGSF.
- 2 CSOs, SBMCs, and journalists/media know how to monitor, investigate, and advocate for transparent procurement and implementation of HGSF services.
- 3 State governments know how to reduce the risk of corruption in feeding programs.

Interim Outcomes – Collaboration: Are actors collaborating to leverage success and build pressure for change?

- 4 Bilateral/multilateral agencies and other key actors (including the MacArthur Foundation) leverage relationships to encourage states to enroll in the HGSF.
- 5 State governments and CSOs coordinate in monitoring HGSF implementation.
- 6 Cross-Cutting: Journalists/media and CSOs share information about the government's HGSF anticorruption promises, activities, and wins.

Interim Outcomes – “Voice:” Are “voice” actors engaging in advocacy and monitoring?

- 7 More CSOs and SBMCs demand/advocate for transparency and accountability related to the HGSF.
- 8 CSOs and journalists/media monitor the flow of HGSF funds and services.
- 9 CSOs and journalists/media educate SBMCs and school personnel about HGSF policies and parents'/schools' rights.
- 10 CSOs, SBMCs, school personnel, and journalists/media monitor the delivery of government-promised feeding programs at schools and demand the HGSF services their children should be receiving.

Interim Outcomes – “Teeth:” Are “teeth” actors operating transparently and holding others accountable?

- 11 Federal and state government(s) implement corruption-reduction practices in the HGSF program by establishing and operationalizing designated structures, inclusive implementation committees (e.g., TAC), and inclusive monitoring/reporting frameworks.
- 12 Federal government sanctions states that do not comply with HGSF guidelines.
- 13 Federal and state governments sanction suppliers violating HGSF contractual obligations.

Long-Term Outcomes: Are improvements institutionalized and social norms shifted in targeted states?

- 14 Citizens in targeted states demand HGSF program services their children should be receiving.
- 15 Actors along the supply chain implement corruption-reduction practices and use HGSF program funds according to guidelines and contractual obligations in targeted states.
- 16 School children receive HGSF benefits that have been hindered by corruption.
- 17 Citizens in targeted states have decreased tolerance for corruption related to HGSF services.

Impacts: Are improvements institutionalized and social norms shifted nationwide?

- 18 Citizens across Nigeria demand the HGSF services their children should be receiving.
- 19 Actors along the supply chain implement corruption-reduction practices and use HGSF program funds according to guidelines and contractual obligations across Nigeria.
- 20 School children across Nigeria receive HGSF benefits that have been hindered by corruption.
- 21 Citizens across Nigeria have decreased tolerance for corruption related to HGSF services.

4.3 Electricity

4.3.1 Background

Nigeria's electricity sector has had a complex and troubled history. As of 2016, the World Bank estimates that only 59 percent of Nigerians had access to electricity,⁵⁵ and even for those who are active customers, service is uneven and generation is far short of demand. In 2013, the Nigerian federal government attempted to resolve some of these issues by privatizing the power sector—selling the electricity generation companies (GenCOs) and distribution companies (DISCOs) to private owners. The National Electricity Regulatory Commission (NERC)—formed in 2005 through the Electric Power Sector Reform Act—is an independent body responsible for managing key electricity tariffs, policies, and standards at a national level, including regulation of generation, transmission, and distribution activities. Meanwhile, more localized management of distribution activities are delegated to 11 DISCOs, which function independently to distribute electricity to *catchment areas* that typically consist of multiple states.

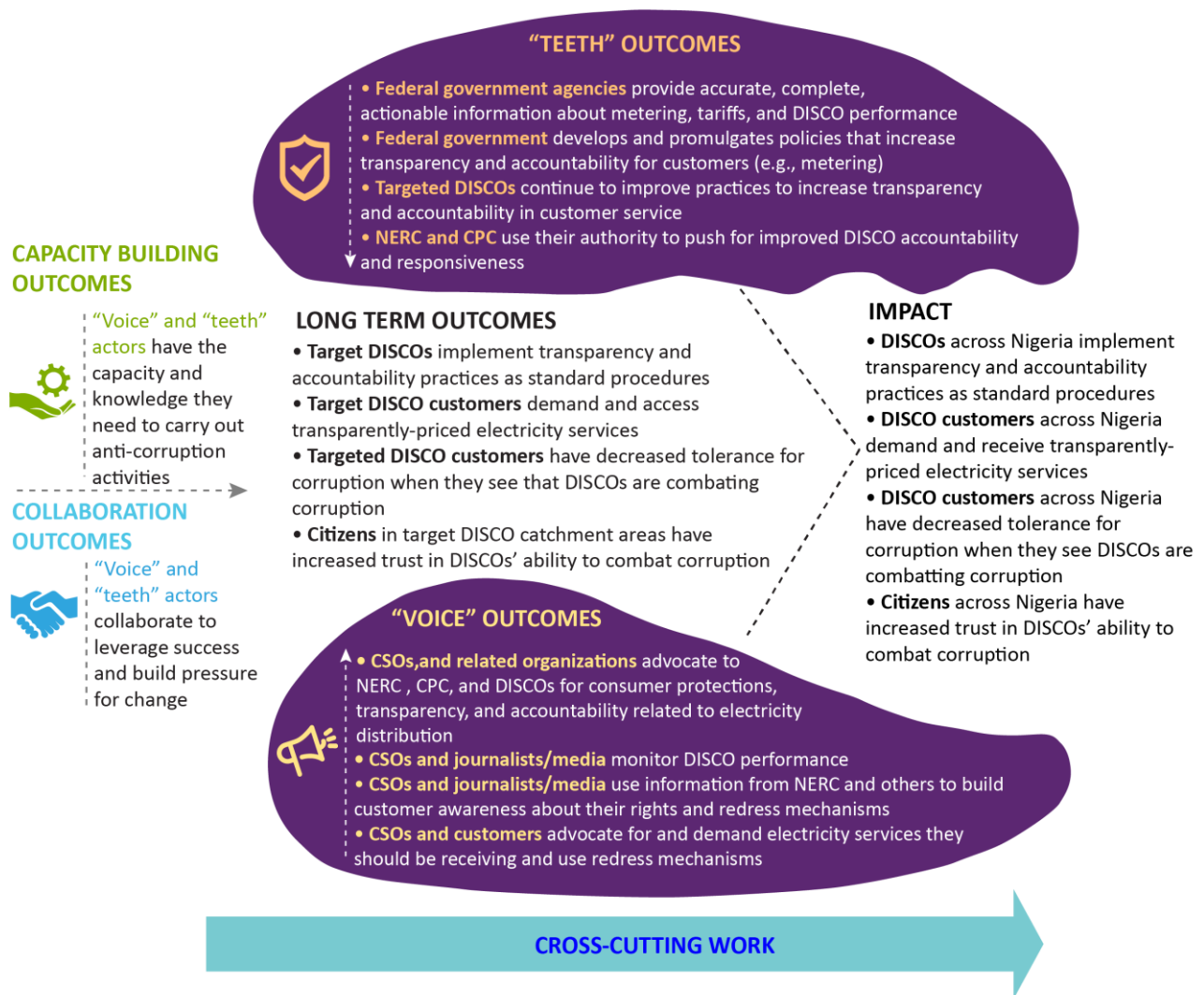
4.3.2 Electricity Theory of Change

In this evolving environment, the On Nigeria theory of change for the electricity sector focuses on promoting transparency and accountability along the electricity distribution chain, as summarized in Exhibit 25 (and shown in more detail in Annex 1). On Nigeria focuses on the Abuja and Benin DISCO catchment areas,⁵⁶ as well as federal-level regulations and reforms that will affect all DISCOs and DISCO customers, and works toward building a virtuous cycle in the sector. Success in long-term outcomes will be marked by changes through which (1) target DISCOs have strengthened transparency and accountability practices; (2) target DISCO customers have lower tolerance for corruption (i.e., bribes and illegal connections) when they see that DISCOs are combatting corruption; and (3) target DISCOs are able to operate viably *and* provide customers with reliable, fairly priced electricity services unhindered by corruption. Additional success at the impact level will be achieved when these improvements to DISCO transparency, customers' tolerance of corruption, and customers' trust in DISCOs' ability to combat corruption are expanded to additional DISCOs across Nigeria. Additionally, although not part of On Nigeria's focus, DISCOs' viability—critical for reliable electricity service—depends on investments laid out in the federal government's *Power Sector Recovery Plan*, cost-reflective tariffs, and customer payments.

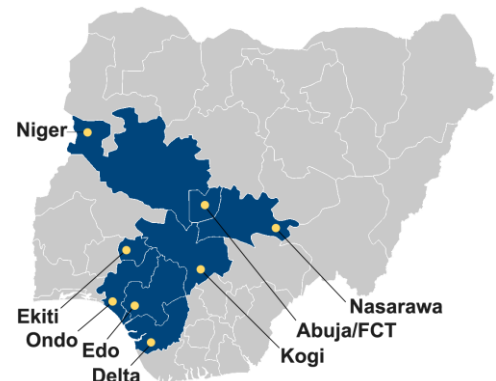
⁵⁵ World Bank. *Access to electricity (% of population)*. Sustainable Energy for All Database. Accessible at: <http://data.worldbank.org/indicator/EG.ELC.ACCS.ZS>. These data come from the 2015/6 Living Standards Measurement Survey, which is a household survey. The 2018 national telephone survey puts electricity access at 92 percent.

⁵⁶ Abuja DISCO covers the FCT, Kogi, Nasarawa, and Niger states. Benin DISCO covers Delta, Edo, Ekiti, and Ondo states.

Exhibit 25: Electricity theory of change



On Nigeria grants in this module targeted a diverse set of actors along the Nigerian electricity distribution chain. Between February 2016 and September 2017, the MacArthur Foundation awarded six grants totaling \$2.3 million to federal regulators, the association of DISCOs, CSOs, business analysts, and media organizations. The work of some of the cross-cutting On Nigeria grantees also contributes to electricity sector efforts. While many grantees work across multiple DISCOs or at a national level, one On Nigeria grantee’s work focuses on the Abuja DISCO, one on the Benin DISCO, and one on both target DISCOs. Grantees working with specific DISCOs have centered their work to specified local districts within the catchment areas, and are not targeting the entire catchment areas.



Grantee CSOs work with customers, DISCOs, and regulators to advocate for transparency and accountability among key electricity sector actors and, in the process, strengthen customers' capacity to understand their rights and redress mechanisms. Simultaneously, regulatory and private-sector actors work to expand metering—a more transparent approach to electricity distribution and payment, especially compared to current practices of estimated billing whereby bills charged to DISCO customers do not accurately reflect electricity use. They are also working to improve DISCOs' responsiveness to customers' complaints. Such “voice” and “teeth” outcomes are supplemented by collaboration among different stakeholders to create a virtuous cycle where electricity providers practice transparency and accountability, customers have decreased tolerance for corruption and can access transparently priced electricity, and financial structures enable DISCO sustainability.

The theory of change posits that these changes will, ultimately, allow customers to access reliable, fairly priced electricity services unhindered by corruption. In particular, by the final strategy review presentation in March 2020, success in the electricity module will be achieved if (1) NERC regulations mandate transparency and accountability, and targeted DISCOs increasingly implement new guidelines on billing, metering, and information on progress; (2) targeted DISCOs, customers, CSOs, and consumer advocacy organizations engage in constructive dialogue and resolve complaints; and (3) customers in target DISCO catchment areas access electricity through meters and use their awareness of the customer's rights to get redress.

4.3.3 *Landscape at Baseline (2015–2016)*

The baseline period for the On Nigeria efforts related to the electricity sector covers 2015 through the start of On Nigeria grants in February 2016. Despite privatization and subsequent heavy investment by donors, private companies, and the government of Nigeria, improving power remained a formidable task. Major external challenges in 2016—a drop in oil prices, a recession, a currency crisis, and attacks in the Niger Delta—aggravated the Nigerian power sector's major liquidity crisis, exacerbating existing operational challenges and weakening the ability of the sector to provide more reliable and fair service to customers. Although data on the electricity sector landscape prior to On Nigeria grants are limited, challenges with corruption, transparency, and accountability existed at each step of the electricity supply chain—from generation and transmission to distribution and consumption. For example, media reports show that historically, consumers paid DISCO employees bribes in exchange for meter installation.⁵⁷ United Nations Office on Drugs and Crime (UNODC) reported that in 2016, of the different types of bribes Nigerians paid, bribes for public utility services (electricity, water, sanitation) were paid the most frequently (20.1 percent).⁵⁸

Electricity sector stakeholders were also developing public resources about and providing media attention to corruption in the electricity sector. NERC first released its *Public Notice on Electricity Customer Rights and Obligations* in February 2016—the same month as the first On Nigeria grant was

⁵⁷ Premium Times. 2017. *AEDC exploiting us, Abuja residents lament*; Energy Mix Report. 2018. *AEDC urges consumers not to pay for prepaid meters*

⁵⁸ UNODC. 2017. *Corruption in Nigeria Bribery: public experience and response*

made—and media monitoring data show that in 2016, electricity keywords made up 47 percent of all corruption and anticorruption mentions related to On Nigeria (out of 2,544 total).

4.3.4 Early Progress and Momentum (2016–2018)



Intended Electricity “Teeth” Interim Outcomes

- **Federal government agencies** provide accurate, complete, and actionable information about metering, tariffs, and DISCOs’ performance (for all DISCOs).
- **Federal government** develops and promulgates policies and regulations for the electricity sector to increase transparency and accountability for customers (e.g., billing, metering).
- **Targeted DISCOs** continue or improve practices that increase transparency and accountability for their services to customers.
- **NERC** and the **Consumer Protection Council (CPC)** use their authority to push for improved DISCO accountability and compliance.

Finding: NERC and DISCOs have introduced some transparency and accountability measures, including more avenues for customers’ complaints, although evidence suggests there are still challenges with data sharing, enforcement, and sanctions.

Over the course of On Nigeria’s early work, document review sources report that NERC and key government actors (such as the Power, Works and Housing Minister Babatunde Fashola) are releasing statements, regulations, and guidelines about metering and related issues to the media.⁵⁹ For example, NERC has released over 400 such documents on its website, including publishing quarterly reports of its activities⁶⁰ online starting in late 2017, while the Federal Ministry of Power, Works and Housing website produced 155 “Power News” stories on its website between August 2017 and July 2018. Nonetheless, grantee annual reports and qualitative interviews with CSO, grantee, and non-DISCO private-sector representatives reported difficulty in accessing accurate electricity sector data from DISCOs and NERC, with some respondents finding information to be questionable or unavailable. However, document review indicated that media were able to obtain and report on information from NERC, including regulations and documents about metering, customer rights, fines, and several other issues.⁶¹

Beyond changes to information sharing, several document review sources⁶² indicated that NERC and DISCOs have introduced some recent transparency and accountability measures, such as changes to payment processing, communications, and customer service. NERC is increasingly issuing regulations and releasing information about consumers’ rights, such as regulations to define eligible customers⁶³

⁵⁹ IWIN. 2017. *Power Sector Privatisation has Delivered*; Punch. 2017. *Nigeria Business Headlines*; NERC. 2018. *NERC Website: www.nercng.org*; Federal Ministry of Power, Works and Housing. 2018. *PWH Website: www.pwh.gov.ng*

⁶⁰ A grantee’s quarterly reports analyze “the state of the Nigerian electricity industry (covering both the operational and commercial performance), regulatory functions, [and] consumer affairs, as well as the Commission’s finances and staff development.”

⁶¹ Independent Energy Watch Initiative. 2017. *Power Sector Privatisation has Delivered*.

⁶² This Day. 2018. *Bill to Criminalise Estimated Billing System by Discos Introduced in House*; Daily Trust. 2018. *Electricity: New metering plan underway*; KPMG. 2017. *A Guide to the Nigerian Power Sector*.

⁶³ This Day. 2017. *Fashola: Regulations on Eligible Customers Ready in October*.

and fines to penalize customers who bypass meters.⁶⁴ For example, in the March 2018 *Meter Asset Provider Regulation*, NERC banned DISCOs from using estimated billing on new customers and directed maximum demand customers⁶⁵ to not pay DISCOs if they were charged with estimated billing. DISCOs were also given 120 days to engage independent Meter Asset Providers (MAPs) to help speed metering progress.⁶⁶ A shortage in meter production has restricted the pace of metering; this is particularly due to guidelines that required manufacturer certification and a minimum amount of local production of meters.⁶⁷

At the DISCO level, grantee reports and qualitative interviews with CSOs, DISCO representatives, and media representatives indicate that some DISCOs, including Benin DISCO, have also collaborated with other stakeholders to improve customer outreach and awareness, and worked to create their own platforms for CSOs and customers to file complaints. In its annual report, a grantee their efforts to improve consumers' complaint resolution mechanisms as they work to influence DISCO responsiveness. Qualitative interview respondents and document review⁶⁸ indicate that between 2016 and 2018, the Abuja and Benin DISCOs have started taking steps to reduce petty corruption among their employees, such as transitioning toward online bill payment and enacting measures to punish corrupt staff. A limited number of interviews with private-sector stakeholders suggest that both target DISCOs are tracking revenue as a way to detect electricity theft.

Grantees at the 2018 convening broadly agreed that although NERC has introduced promising "teeth"-level regulations, challenges with compliance, enforcement, and complaint resolution remain. To date, neither qualitative interviews nor document review provided substantial evidence of NERC wielding its ultimate "teeth" action of effectively sanctioning DISCOs. However, in qualitative interviews, one NERC and one media representative reported NERC placing a fine on Ibadan DISCO in October 2017.⁶⁹

All in all, some data suggest that these new "teeth" measures are yielding results. For example, a grantee annual report noted that the "willingness of the [Benin DISCO] to engage with other stakeholders...has led to better understanding of its operations, strengthened communication with customers, and improved resolution of complaints."⁷⁰

⁶⁴ NERC. 2017. *Consumers to pay N450,000 fine for meter bypass*

⁶⁵ Maximum-demand customers are customers that have their own dedicated transformers and typically include ministries, the military, industries, large-scale companies and stores, and other entities that consume large amounts of electricity.

⁶⁶ IWIN. 2017. *NERC's New Metering Options, Lifebuoy to DISCOs*; Premium Times. 2017. *AEDC exploiting us, Abuja residents lament*; Daily Trust. 2018. *Electricity: New metering plan underway*; Nigeria Electricity Hub. 2018. *Rights of the Electricity Consumer*

⁶⁷ Punch. 2017. *Indigenous Meter Firm Receives SON's MANCAP Certification*.

⁶⁸ Energy Mix Report. 2018. *DISCOs will clamp down on fraudulent workers*; Energy Mix Report. 2018. *AEDC urges consumers not to pay for prepaid meters*; The Guardian. 2017. *Ikeja Electric moves against unethical practices*

⁶⁹ Daily Trust. 2017. *NERC slams N50m fine on Ibadan DisCo, orders recovery of N5.75bn*.

⁷⁰ Grantee annual report, 2016.



Intended Electricity “Voice” Interim Outcomes

- **CSOs, and related organizations** advocate with NERC, CPC, and DISCOs for consumer protections, transparency, and accountability related to electricity distribution.
- **CSOs and journalists/media** monitor DISCOs’ performance.
- **CSOs and journalists/media** use information from NERC and others to generate awareness, and educate customers about their rights and redress mechanisms.
- **CSOs and customers** advocate for and demand electricity services they should be receiving, and use redress mechanisms.

Finding: There is strong evidence of “voice” momentum in the electricity sector, with CSOs, customers, and media monitoring electricity distribution and advocating for improved performance, transparency, and accountability.

There is an emerging “voice” momentum related to electricity distribution. In grantee annual reports, CSOs report advocating to NERC and DISCOs to improve transparency and accountability in the electricity sector. Qualitative interviews indicated that grantees and other non-grantee CSOs monitor the electricity sector and DISCO performance using a wide variety of methods, including social media, surveys, and annual evaluations. They also rely on different types of sector data, which cover issues ranging from safety and metering to customer complaints and budgets, and report that greater internal capacity—as well as increased DISCO and government transparency—would help improve and expand monitoring.

In addition to monitoring, CSOs and grantee interview respondents described advocating for consumers and working to solve complaints through CSO and grantee-organized mechanisms, such as town halls, letters, media engagement, radio programs, and protest. In annual reports, grantees also reported they were collaborating with other CSOs, media, government, and Abuja and Benin DISCOs to raise electricity sector awareness through strategies such as radio programs and town halls. Other grantees use strategic litigation to push for accountability in the electricity sector. The groups believed these methods were starting to improve electricity distribution services and pricing.

At the same time as these awareness and advocacy events were occurring, CSOs, grantees, journalists, and DISCO interview respondents described growing public awareness and genuine grassroots interest in changes in the electricity sector, both for improved electricity service delivery and anticorruption measures. Media monitoring data indicate that the Nigerian media have heavily reported on electricity corruption issues, particularly in 2016, and with a focus on DISCOs; however, 2018 media monitoring revealed far fewer electricity mentions, with almost no mentions of DISCOs. Grantees at the November 2018 convening believed that media reporting primarily covers large-scale electricity corruption issues, such as fund misappropriation, while ignoring the petty corruption they perceived as more pervasive.

At an individual level, in the national telephone survey, a significant number of DISCO customers reported personally contacting a DISCO representative to complain about their electricity services in the past year. Fifty-two (52) percent of customers in the Abuja DISCO catchment area (95% confidence interval: 46–57%) reported contacting such a representative multiple times, while another 6 percent (95% confidence interval: 4–8%) reported making a complaint once. Similarly, in

the Benin DISCO catchment area, 61 percent of customers complained multiple times in the past year (95% confidence interval: 56–64%) and 4 percent complained once (95% confidence interval: 3–5%).



Intended Electricity Capacity Building Interim Outcomes

- **CSOs and journalists/media** are aware of entitlements, government policies, and processes related to electricity distribution.
- **CSOs and customers** know their rights and how to access redress mechanisms related to electricity distribution.
- **DISCO management** knows how to implement and monitor anticorruption actions with their staff.

Finding: Civil society, NERC, and Benin DISCO are working to educate customers on how to reduce corruption and increase efficiency in the electricity sector, although customers' awareness of their rights remains weak.

In qualitative interviews, CSO, media, government electricity regulator, and private-sector respondents described the importance of consumer education for tackling corruption and inefficiency in the electricity sector. CSOs reported that civil society is creating a “culture of awareness,” which they perceive to have improved DISCO customer service through “voice” activities in target DISCOs, particularly in Benin. Several grantee annual reports described grantee and DISCO training events to promote consumer education and public engagement.⁷¹ Some qualitative respondents noted that more training for CSOs, media, and those within the sector; improved capacity of electricity sector staff; and increased technology use in metering and billing could also help reduce corruption.

Grantee Efforts for Capacity Building

- Training and customer education through town halls and radio programs
- Performance monitoring of DISCOs
- Engaging DISCOs themselves in customer education events

Citizens' awareness of their rights related to electricity services, which are outlined in the *2005 Electricity Power Sector Reform Act*,⁷² is key to their ability to demand compliance. The national telephone survey data show that 62 percent of DISCO customers knows that Nigerian electricity customers have a right to safe and reliable electricity supply⁷³ (95% confidence interval: 60–63%). However, less than 20 percent were aware of other key customers' rights: right to a functioning metering, transparent billing, and complaint/investigation (see Exhibit 26).

⁷¹ Three grantee annual reports, 2017.

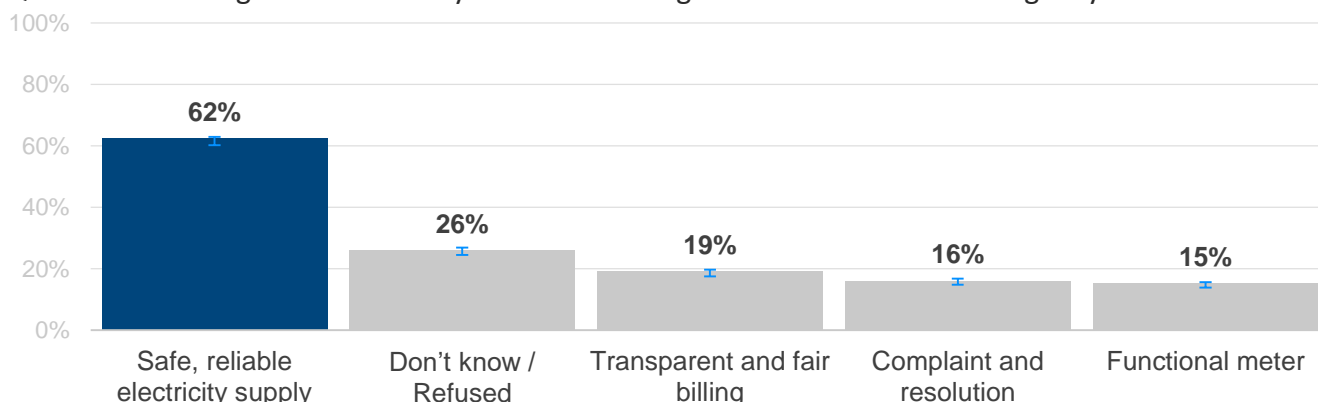
⁷² NERC. 2015. *Consumer Rights and Obligations*.

⁷³ The national telephone survey asked respondents to list spontaneously the right they knew of, and categorized the 15 rights established by the *Electricity Power Sector Recovery Act* into four groups.

Exhibit 26: Proportion of customers who know key electricity rights (not mutually exclusive)

(n=7,549)

Question: What rights do electricity customers in Nigeria have? Please list all rights you know of.



On Nigeria national telephone survey 2018



Intended Electricity Collaboration Interim Outcomes

- **Bilateral/multilateral agencies and other key actors (including the MacArthur Foundation)** leverage relationships to encourage government and DISCO responsiveness.
- **Targeted DISCOs, customers, and consumer advocacy organizations** engage in constructive dialogue, resolve complaints, and hold each other accountable to regulations.
- **Cross-Cutting: Journalists/media and CSOs** share information about government and business anticorruption promises, activities, and wins

Finding: Grantees, DISCOs, government entities, private-sector stakeholders, and media actors closely collaborate to increase customers' knowledge of, demand for, and momentum toward improved electricity distribution and accountability.

In qualitative interviews, grantees, CSOs, DISCOs, government officials, private-sector stakeholders, and media representatives shared numerous examples of NERC, DISCOs (particularly Benin DISCO), grantees, CSOs, media, and private-sector organizations collaborating through a variety of platforms to boost consumer awareness and advocacy for electricity corruption issues. Key examples include the radio shows and town halls that bring together diverse stakeholders in conversations that seek to educate and provide a voice for the public within the sector. In particular, grantees described the importance of information sharing among themselves and with other CSOs as they work to improve transparency and accountability in the sector. Apart from NERC's information sharing, there was little evidence of open collaboration between "voice" and "teeth" actors.

Collaboration between civil society and media actors also appeared strong. Of media monitoring mentions from 2018, electricity keywords made up 19 percent of all corruption and anticorruption mentions related to On Nigeria. The qualitative respondents mentioned above indicated that media partners facilitate customer engagement through fora such as the radio programs. Similarly, in their annual reports, grantees reported that they collaborated with the government, Abuja and Benin DISCOs, and other CSOs and media to improve communication channels, elicit customer feedback,

support journalism to investigate and report electricity corruption, and hold town halls with sector stakeholders and radio programs that address customer complaints.⁷⁴



Intended Electricity Long-Term Outcomes

- **Targeted DISCOs** implement transparency and accountability practices as standard procedures.
- **Targeted DISCO customers** demand and access transparently priced (e.g., metered) electricity.
- **Targeted DISCO customers** have decreased tolerance for corruption (bribes and connecting illegally) when they see that DISCOs are combating corruption.
- **Citizens in targeted DISCO catchment areas** have increased trust in the DISCOs' ability to combat corruption.

Finding: Although target DISCOs are beginning to implement key transparency and accountability measures, customers and CSOs have poor perceptions of their responsiveness to customer complaints and will for reform. Both DISCOs are progressing slowly with electricity metering—a key strategy for achieving billing transparency—but estimated billing remains widespread. Perceived electricity price transparency is poor overall. However, metered customers perceive prices to be more transparent than customers with estimated billing.

Qualitative interviews and grantee data suggest that target DISCOs have taken some measures to implement transparency and accountability practices, although more evidence was available to describe changes in the Benin DISCO. In addition to measures reported in the *Teeth* section above, a grantee annual report noted that Benin DISCO was mounting prepaid meters on electrical poles to discourage power theft; CSO, media, and private-sector stakeholders reported standard procedures for cashless payment processing they found effective, as well as improved public accessibility on the part of the Benin DISCO.

Despite Abuja and Benin DISCOs' initial efforts to improve transparency and accountability, qualitative interview respondents noted that target DISCOs' resolution of complaints—an important sign of functioning accountability—remained a challenge. Among telephone survey respondents in the target DISCO catchment areas who contacted a DISCO representative at least once in the past year to report a complaint, 64 percent in Abuja DISCO and 83 percent in the Benin DISCO rated the DISCO's response as "very bad" or "fairly bad" (95% confidence intervals: 57%–70% and 79%–86%, respectively). Qualitative interviews with CSOs, private-sector stakeholders, media, and government officials provided examples of some customer complaints being resolved, but noted ongoing challenges with complaint issuance and resolution on the part of both customers and DISCOs. One CSO in Edo (Benin DISCO catchment area) reported that DISCOs may put "preconditions" on complaint resolution, with DISCO representatives requesting a percentage of the payment before addressing a complaint, while a government official reported that many customers brought complaints, but would not follow the necessary processes to get them resolved.

⁷⁴ Two grantee annual report, 2016; Grantee annual report, 2017.

One key corruption disruptor in the electricity theory of change is the expansion of prepaid meter use because metering replaces estimated billing and provides a more transparent process to ensure customers pay only for what they use. Evidence from document review⁷⁵ and qualitative interviews with grantees, journalists, CSOs, and government representatives indicates that although DISCOs are increasing prepaid meter use, progress is slow and estimated billing—a practice that is more profitable and less labor-intensive for DISCOs—remains widespread. A series of NERC regulations to end estimated billing have created top-down pressure to implement metering.⁷⁶

The extent of metering varies widely among different data sources (see Exhibit 27). Metering rates DISCOs reported (available in NERC reports) are much higher than those from the national telephone survey, both nationally and in On Nigeria target DISCO catchment areas. National telephone survey data (collected in August and September 2018) indicate that 28 percent of Benin DISCO customers are using prepaid meters (95% confidence interval: 25%–31%) compared to the 64 percent NERC reported for June 2018. The disparity is similar for Abuja DISCO customers: 16 percent (95% confidence interval: 14%–19%) from the telephone survey and 58 percent from NERC.⁷⁷ Grantees at the 2018 convening felt the survey numbers resonated more with their own experiences, and NERC is currently finalizing a process to clean and validate data they receive from each DISCO. Grantees also noted that bulk metering of rural areas—where villages or communities are collectively metered—might not be captured in these survey data because residents would not have access to individual meters or billing that reflects their personal electricity use.⁷⁸

⁷⁵ Premium Times. 2017. *AEDC exploiting us, Abuja residents lament*; Vanguard. 2018. *It would take 15yrs for DISCOS to solve problem of metering*; Independent Energy Watch Initiative. 2017. *Electricity: Over 50 Percent of Customers Unmetered 4 Years After Privatisation*.

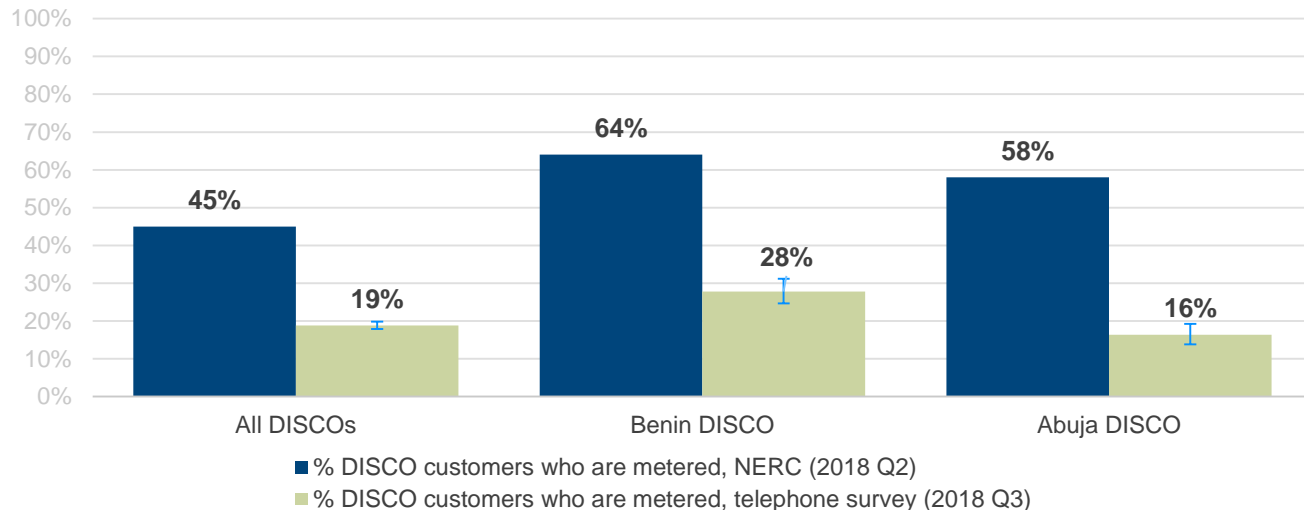
⁷⁶ Daily Trust. 2018. *Electricity: New metering plan underway*.

⁷⁷ NERC. 2018. *Quarterly Report: Second Quarter 2018*. Note that NERC data are based on DISCO reporting.

⁷⁸ Grantees believed bulk metering would not be captured in the national telephone survey, but were unclear about whether NERC—and, ultimately, DISCO—data reflect this.

Exhibit 27: Comparison of NERC and national telephone survey rates for metering for 2018

On Nigeria national telephone survey 2018 (n=7,549); NERC Quarterly Report: Second Quarter 2018, compiled from DISCO data*

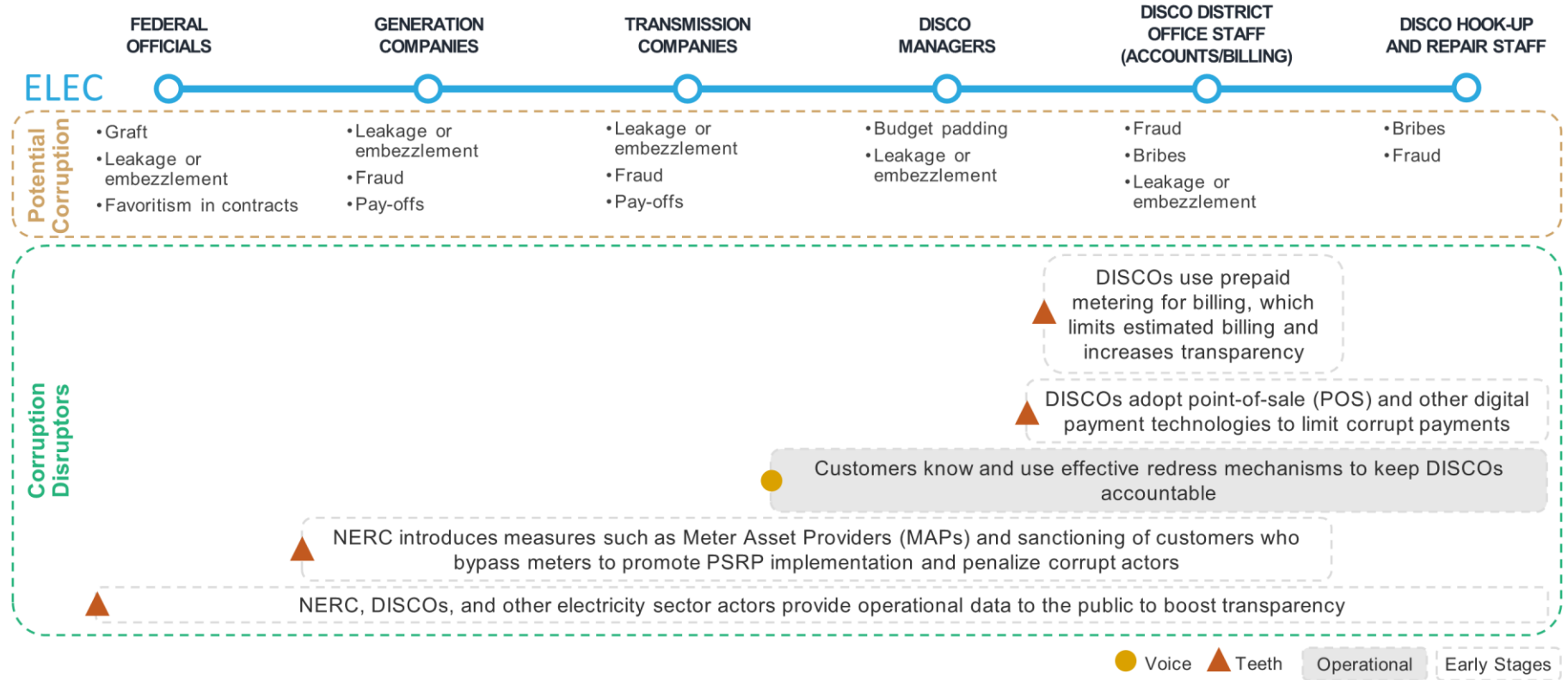


*Note that NERC data do not include confidence intervals.

Using a meter is significantly correlated with perceptions of transparency in pricing ($p < 0.001$). Within the target DISCOs of Abuja and Benin, 59 percent of customers who use prepaid meters for their electricity feel prices are transparent or very transparent ($n=308$, 95% confidence interval: 53%–64%), compared to 13 percent of those who pay with estimated billing ($n=952$, 95% confidence interval: 11%–16%).

Exhibit 28 presents various active and potential corruption disruptors along the electricity supply chain. Prepaid meters, DISCOs' adoption of digital payment systems, and public provision of data by electricity sector actors have the potential to reduce corruption in distribution systems if, and when, they become effectively implemented; to date, implementation scope is still limited. There has been progress in customers' knowledge and use of effective redress systems for reporting corruption of different forms. For example, in addition to its "voice" activities, the CPC serves as a mediation platform between individual customers and DISCOs for complaint resolution. Conversely, grantees provided examples of both DISCO staff and customers tampering with meters, which can result in faulty meter readings and over- or under-billing. Other potential, not yet fully operationalized disruptors at the "teeth" level include NERC measures to promote *Power Sector Recovery Plan* implementation and sanction corrupt actors. Examples are the MAPs initiative to speed up metering and reduce estimated billing, and new regulations to sanction customers who collaborate with DISCO staff to bypass meters.

Exhibit 28: Electricity corruption chain and disruptors*



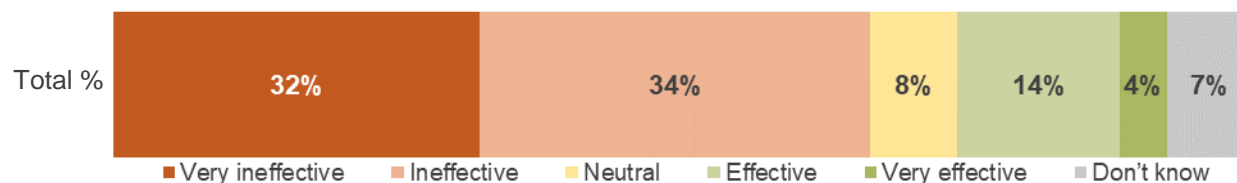
*Note that On Nigeria does not address corruption within generation or transmission companies, although these actors affect the supply chain and distribution.

In general, customers have serious doubts about target DISCOs' willingness and effectiveness in addressing corruption in the sector. Exhibit 29 shows that 67 percent of national telephone survey respondents in the Abuja and Benin DISCO catchment areas believe these two DISCOs are "very ineffective" or "ineffective" at addressing corrupt practices (95% confidence interval: 63%–70%). A subnational survey Stakeholder Democracy Network conducted in the Benin DISCO catchment area shows similar sentiments (see box at right).⁷⁹ At the same time, perceived customer tolerance of corruption remains fairly high: 61 percent of electricity customers in the Abuja or Benin DISCO catchment areas who think there is corruption in the sector believe DISCO customers are "very tolerant" or "tolerant" of corruption (95% confidence interval: 61%–64%).

77%
of Benin DISCO customers surveyed do not think the DISCO is doing enough to punish corrupt employees.⁷⁹

Exhibit 29: Customers' perceptions of target DISCOs' effectiveness in addressing corrupt practices

(n=929 customers in the Abuja or Benin DISCO catchment areas who think there is corruption in the sector)



On Nigeria national telephone survey 2018



Intended Electricity Impacts

- DISCOs across Nigeria implement transparency and accountability practices as standard procedures.
- DISCO customers across Nigeria receive transparently priced electricity services
- DISCO customers across Nigeria have decreased tolerance for corruption (bribes and illegal connections) when they see that DISCOs are combatting corruption.
- Citizens across Nigeria have increased trust in the DISCOs' ability to combat corruption.

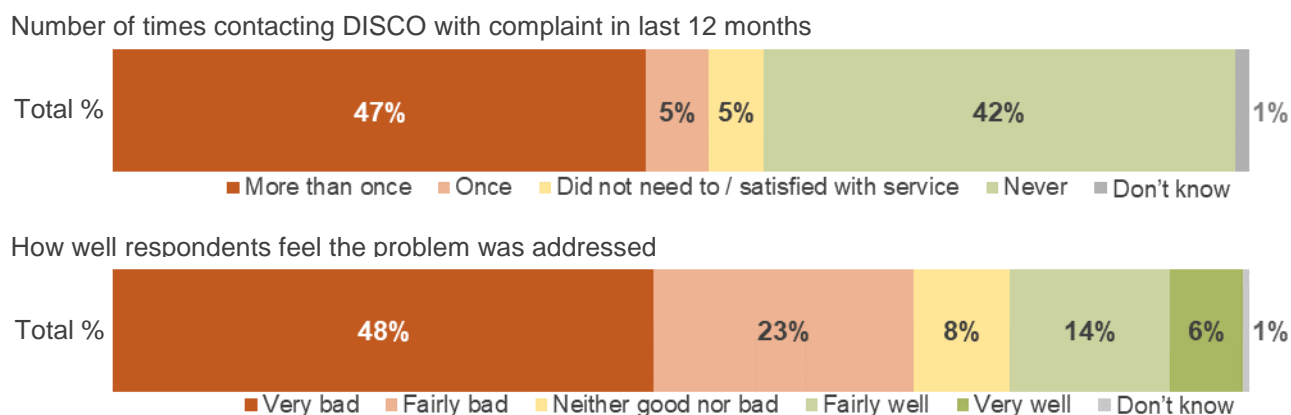
Finding: While it is still too early to determine whether On Nigeria efforts have shifted norms or whether transparency and accountability measures have been institutionalized, national electricity sector corruption challenges mirror those found in target DISCOs. Across Nigeria, customers find DISCOs' responsiveness to complaints and effectiveness to be poor, a majority of customers are subject to estimated billing, and customers' tolerance for corruption remains high. As with target DISCOs, customers' perception of price transparency is linked to method of billing.

At this stage, no data are available at a national level on DISCO practices. However, many of the challenges and frustrations customers reported for the target DISCOs are also evident at the national level. For example, 52 percent of DISCO customers in the national telephone survey said they had

⁷⁹ Stakeholder Democracy Network. 2017. *Corruption Perception Index Report*.

complained to a DISCO representative about their electricity service in the last year (95% confidence interval: 51%–54%), typically multiple times (Exhibit 30), and 70 percent of these customers felt their DISCO’s response to the problem was “very bad” or “fairly bad” (95% confidence interval: 69%–72%).

Exhibit 30: Perceptions of customers across Nigeria about DISCOs’ effectiveness and responsiveness
(n=7,549 for question 1; n=4,140 for question 2)



On Nigeria national telephone survey 2018

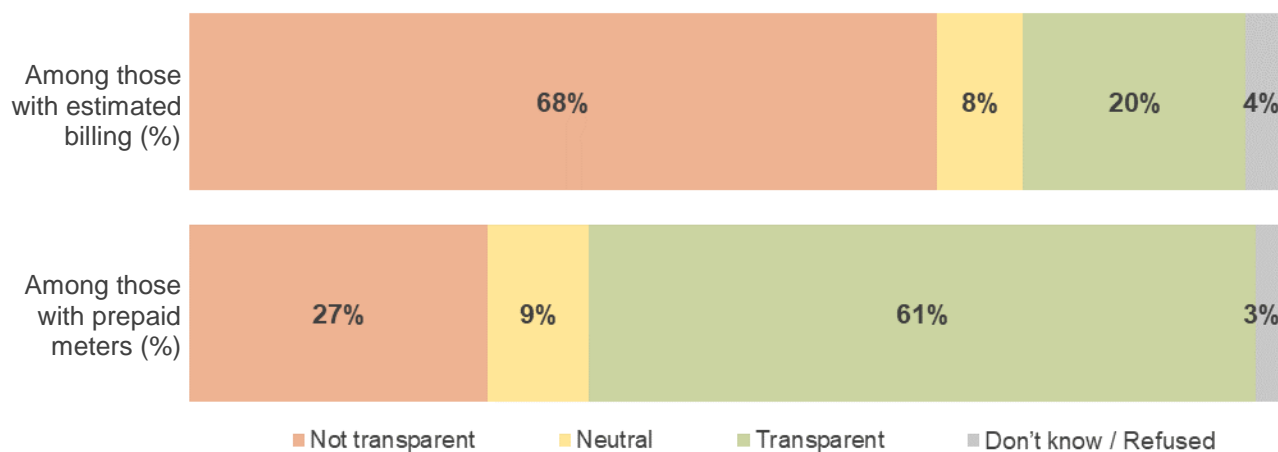
In terms of metering, national telephone survey data indicate that among Nigerians who receive electricity from a DISCO, 19 percent have prepaid meters (95% confidence interval: 18%–20%), while 79 percent remain subject to estimated billing (95% confidence interval: 78%–80%). In contrast, NERC quarterly reports indicated that as of June 2018, more than twice as many customers with meters—45 percent—nationwide.⁸⁰

Across Nigeria, 61 percent of customers who use prepaid meters for their electricity feel prices are transparent or very transparent (95% confidence interval: 58%–63%), compared to 20 percent of those who pay with estimated billing (95% confidence interval: 19%–21%) (p<0.001).

⁸⁰ NERC. 2018. *Quarterly Report: Second Quarter 2018*. Note that NERC data are based on DISCO reporting.

Exhibit 31: Customers’ perceptions of transparency in electricity prices

(n=5,920 for estimated billing, n=1,516 for prepaid meters)



On Nigeria national telephone survey 2018

Perceptions of corruption tolerance remain high, with 62 percent of DISCO customers reporting other customers are “very tolerant” or “tolerant” of electricity sector corruption (95% confidence interval: 61%–64%), while 65 percent of Nigerians view their DISCO as “very ineffective” or “effective” in addressing corrupt practices (95% confidence interval: 63%–66%).

4.3.5 Changing Landscape (2016–2018)

In light of the numerous challenges facing electricity distribution in Nigeria, the Federal Executive Council approved a 5-year *Power Sector Recovery Plan* in March 2017 in an attempt to “reset” and reform the electricity sector, specifically supporting the sector’s financial viability and improving access to electricity services. NERC also introduced policies to support metering and eliminate estimated billing, which are initial steps toward rebuilding the long-lost trust in the sector. For example, NERC directed that DISCOs meter all maximum-demand customers⁸¹ by March 2017, and subsequently collected data verify that this was achieved.⁸²



Many challenges in the context have been explicitly laid out in the assumptions for this module (summarized in Exhibit 32 below). For example, liquidity continues to be a major challenge in the electricity sector.⁸³ Both qualitative interviews and document review of a wide range of sources indicate that tariffs are not cost-reflective. Furthermore, a large number of individual consumers and

⁸¹ Maximum-demand customers are those that have their own dedicated transformers and typically include ministries, the military, industries, large-scale companies and stores, and other entities that consume large amounts of electricity.

⁸² Punch. 2017. *Metering deadline: NERC Verifies Power Firms’ Data*.

⁸³ The Guardian. 2017. *FG’s N701b Intervention Not Enough in Power Sector, Says NERC*; KPMG. 2017. *A guide to the Nigerian Power Sector*.

maximum-demand customers, including the federal government itself,⁸⁴ refuse to pay for the electricity they receive or illegally bypass connections, making it difficult for DISCOs to be financially viable.⁸⁵ GenCOs have also not yet received capital infusion and other resources to satisfy transmission companies' and DISCOs' electricity demands,⁸⁶ while poor infrastructure contributes to stagnation in service delivery.⁸⁷ At the same time, DISCOs are under increasing government and public pressure to enact changes in practices, as described earlier in this report.

Overall, qualitative interviews with a range of grantees and CSOs suggest that the *Power Sector Recovery Plan* has still not fully undertaken expected measures to reform the sector, and vested interests make progress challenging. Several media articles similarly describe electricity sector actors who continue to employ practices that are contrary to the *Power Sector Recovery Plan*.⁸⁸ Qualitative interviews across stakeholders indicate that DISCOs, customers, government representatives, or other actors blame others for lack of progress to date. For example, CSO, grantee, and media respondents mentioned DISCO staff members and customers the most frequently as resistant to improving transparency and accountability. A grantee annual report indicated that political actors who lack political will to improve policy were a problem, while document review suggests that customers who bypass meters, DISCOs, and GenCOs are the most resistant to positive changes in the sector.

4.3.6 Assumptions

The On Nigeria electricity module's theory of change rests on several assumptions that reflect the complex and turbulent environment in which the sector functions, as well as the long supply chain before electricity reaches the customer. Qualitative interviews and document review indicate that several fundamental sector challenges remain intractable and put the anticorruption agenda at the distribution level at some risk.

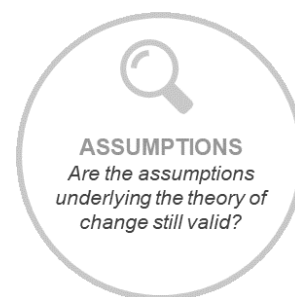


Exhibit 32 : Level of assumption confirmation

Confirmed: ; Mixed: ; Rejected: ; Insufficient Evidence:

Assumption	Level of Confirmation
Sufficient numbers of meters are available.	
Allowing direct buying from GenCO does not disrupt DISCOs.	

⁸⁴ The Guardian. 2017. *Electricity Tariff Hike Imminent, as Stakeholders Demand Cost-Reflective Charges*.

⁸⁵ Punch. 2017. *Consumers to pay N450,000 fine for meter bypass*.

⁸⁶ Independent Energy Watch Initiative. 2017. *GenCOs – Eligible Customers’ Bye-Law Will Break DISCOs’ Monopoly*; The Guardian. 2017. *Electricity Tariff Hike Imminent, as Stakeholders Demand Cost-Reflective Charges*.

⁸⁷ Grantee annual report, 2016; This Day. 2018. *FG Will Meet You in Court, Fashola Tells Power GenCOs*.

⁸⁸ This Day. 2018. *FG Will Meet You in Court, Fashola Tells Power GenCOs*. This Day. 2017. *New Recovery Plan to Rescue the Electricity Market*.

Assumption	Level of Confirmation
The <i>Power Sector Recovery Plan</i> proceeds according to plan, and/or all actors play their respective roles.	
DISCOs and transmission/generation companies receive the infusion of capital they need to strengthen and maintain their viability and provide reliable access to electricity.	
Government consumers (such as the military) pay for electricity services.	
Consumers, government, business, and other customers respond to more reliable service by paying for the services they use.	
Consumers pay for electricity services they use.	
Cost-reflective tariffs have been introduced into the system.	
Customers' payments and adequate investment are improving DISCOs' ability to maintain infrastructure, pay operators, and manage operations.	
GenCOs provide adequate power to meet consumer demand.	
GenCOs have adequate technology, resources, and gas supply to provide electricity needed by transmission companies and DISCOs.	
Sabotage does not interfere with the supply of oil.	
Transmission Company of Nigeria is able to transmit adequate power for DISCOs to distribute in the right locations.	
Office of the Vice President monitors implementation of the <i>Power Sector Recovery Plan</i> .	
Government, CPC, development banks, and private companies discuss ways to improve provision of information about metering, tariffs, and DISCOs' performance.	
DISCOs meter and monitor metering.	
Customers/consumers refrain from bypassing/illegally connecting and committing other kinds of petty corruption.	

4.3.7 Summary and Conclusions for the Electricity Module in 2018

Evidence from 2018 suggests that efforts to increase transparency and accountability along the electricity supply chain have contributed to some initial progress, particularly in “voice” outcomes and emerging actions in the “teeth” outcomes. Grantees’ efforts have made tangible progress in improving customer awareness of rights, mechanisms for DISCO responsiveness to complaints, regulatory information sharing, and collaboration across “voice” and “teeth” actors. Through collaboration between different electricity actors, stakeholders perceive an increase in citizens’ awareness of their rights and use of redress mechanisms, which in turn, contributes to increased CSO and customer demand for DISCOs’ transparency and accountability. While NERC has introduced multiple regulations to improve distributor practices, evidence of compliance, enforcement, and complaint resolution remains limited and intermittent. Public perceptions of electricity billing transparency are strongly linked to metering and expanded metering is slowly making progress. This progress, along with other DISCOs’ transparency and accountability practices with customer

payments, may contribute to a virtuous cycle within the electricity sector. Exhibit 33 summarizes progress (shown in yellow or green status for each electricity module outcome).

However, the electricity sector is complex and faces several challenges external to the On Nigeria strategy. Key contextual factors that affect the viability of DISCOs—irrespective of corruption—remain problematic, including issues related to power generation and transmission, and DISCO liquidity. DISCO liquidity is closely linked to tariffs (that are currently not cost-reflective) and consumer non-payment. While the window of opportunity for On Nigeria efforts remains open, the extent to which current anticorruption efforts can effect change in transparent and accountable electricity distribution remains dependent on broader reform.

Exhibit 33 also indicates where the 2018 data were inadequate to reveal progress for some outcomes. While document review, qualitative interviews, the national telephone survey, and other sources provided well-substantiated evidence for most “voice” outcomes, quantitative data were not available for many “teeth” outcomes. These included the proportion of customer and CSO complaints DISCOs resolved; the extent of NERC sanctioning of non-complying DISCOs; and the extent to which target DISCOs implement transparency and accountability practices as standard procedure. There was also minimal evidence of media mentions of CSOs referencing anticorruption efforts, and information to support that CSOs influenced NERC and DISCOs to combat corruption.

Exhibit 33: Electricity outcomes and progress

- Substantial progress: Clear signs of movement since the beginning of On Nigeria
- Moderate progress: Some momentum visible since the beginning of On Nigeria
- No progress or regression: No indications of movement since the beginning of On Nigeria or a worsening of the situation
- Inadequate or no data available to assess progress

Interim Outcomes – Capacity Building: Do “voice” and “teeth” actors have the capacity and knowledge they need?	
1	CSOs and journalists/media are aware of entitlements, government policies, and processes related to electricity distribution.
2	CSOs and customers know their rights and how to access redress mechanisms related to electricity distribution.
3	DISCO management knows how to implement and monitor anticorruption actions with their staff.
Interim Outcomes – Collaboration: Are actors collaborating to leverage success and build pressure for change?	
4	Bilateral/multilateral agencies and other key actors (including the MacArthur Foundation) leverage relationships to encourage government and DISCO responsiveness.
5	Targeted DISCOs, customers, and consumer advocacy organizations engage in constructive dialogue, resolve complaints, and hold each other accountable to regulations.
6	Cross-Cutting: Journalists/media and CSOs share information about government and business anticorruption promises, activities, and wins.
Interim Outcomes – “Voice:” Are “voice” actors engaging in advocacy and monitoring?	
7	CSOs, and related organizations advocate with NERC, CPC, and DISCOs for consumer protections, transparency, and accountability related to electricity distribution
8	CSOs and journalists/media monitor DISCOs' performance.
9	CSOs and journalists/media use information from NERC and others to generate awareness, and educate customers about their rights and redress mechanisms.
10	CSOs and customers advocate for and demand electricity services they should be receiving, and use redress mechanisms.

Interim Outcomes – “Teeth:” Are “teeth” actors operating transparently and holding others accountable?

- 11 Federal government agencies provide accurate, complete, and actionable information about metering, tariffs, and DISCOs' performance (for all DISCOs).
- 12 Federal government develops and promulgates policies and regulations for the electricity sector to increase transparency and accountability for customers (e.g., billing, metering).
- 13 Targeted DISCOs continue or improve practices that increase transparency and accountability for their services to customers.
- 14 NERC sanctions DISCOs that do not comply with government guidelines and violate customers' rights outlined in their performance contracts.
- 15 The CPC uses its authority to compel DISCOs to respond to customers' complaints

Long-Term Outcomes: Are improvements institutionalized and social norms shifted in targeted states?

- 16 Targeted DISCOs implement transparency and accountability practices as standard procedures.
- 17 Targeted DISCO customers demand and access transparently priced (e.g., metered) electricity.
- 18 Targeted DISCO customers have decreased tolerance for corruption (bribes and connecting illegally) when they see that DISCOs are combating corruption.
- 19 Citizens in targeted DISCO catchment areas have increased trust in DISCOs' ability to combat corruption.

Impacts: Are improvements institutionalized and social norms shifted nationwide?

- 20 DISCOs across Nigeria implement transparency and accountability practices as standard procedures.
- 21 DISCO customers across Nigeria receive transparently priced electricity services.
- 22 DISCO customers across Nigeria have decreased tolerance for corruption (bribes and illegal connections) when they see that DISCOs are combatting corruption.
- 23 Citizens across Nigeria have increased trust in DISCOs' ability to combat corruption.

4.4 Criminal Justice

4.4.1 Background

President Goodluck Jonathan signed the Administration of Criminal Justice Act (ACJA) into law in 2015, with sweeping provisions aimed at improving and harmonizing the criminal justice system, narrowing the loopholes for corrupt actors to avoid prosecution and conviction. Among the many ACJA elements, four in particular support the fight against corruption through criminal prosecution in the courts (see box).⁸⁹ Although the ACJA does not explicitly address corruption in the criminal

Four Essential ACJA Elements for Anticorruption

1. Use of qualified legal practitioners only in prosecuting criminal cases
2. Regulations limiting interlocutory appeals
3. Speedy dispensation of trials
4. Inclusion of state-level Criminal Justice Monitoring Committee

⁸⁹ In the context of the Nigerian criminal justice sector, “interlocutory appeals” have historically been invoked to stall high-profile corruption cases. (Sahara Reporters. 2018. *Revealed: In Seven Years, only 10 of 177 grand corruption cases led to convictions*)

justice system, provisions such as the four essential elements and strengthening the capacity of the criminal justice system can significantly boost anticorruption investigations and prosecutions.

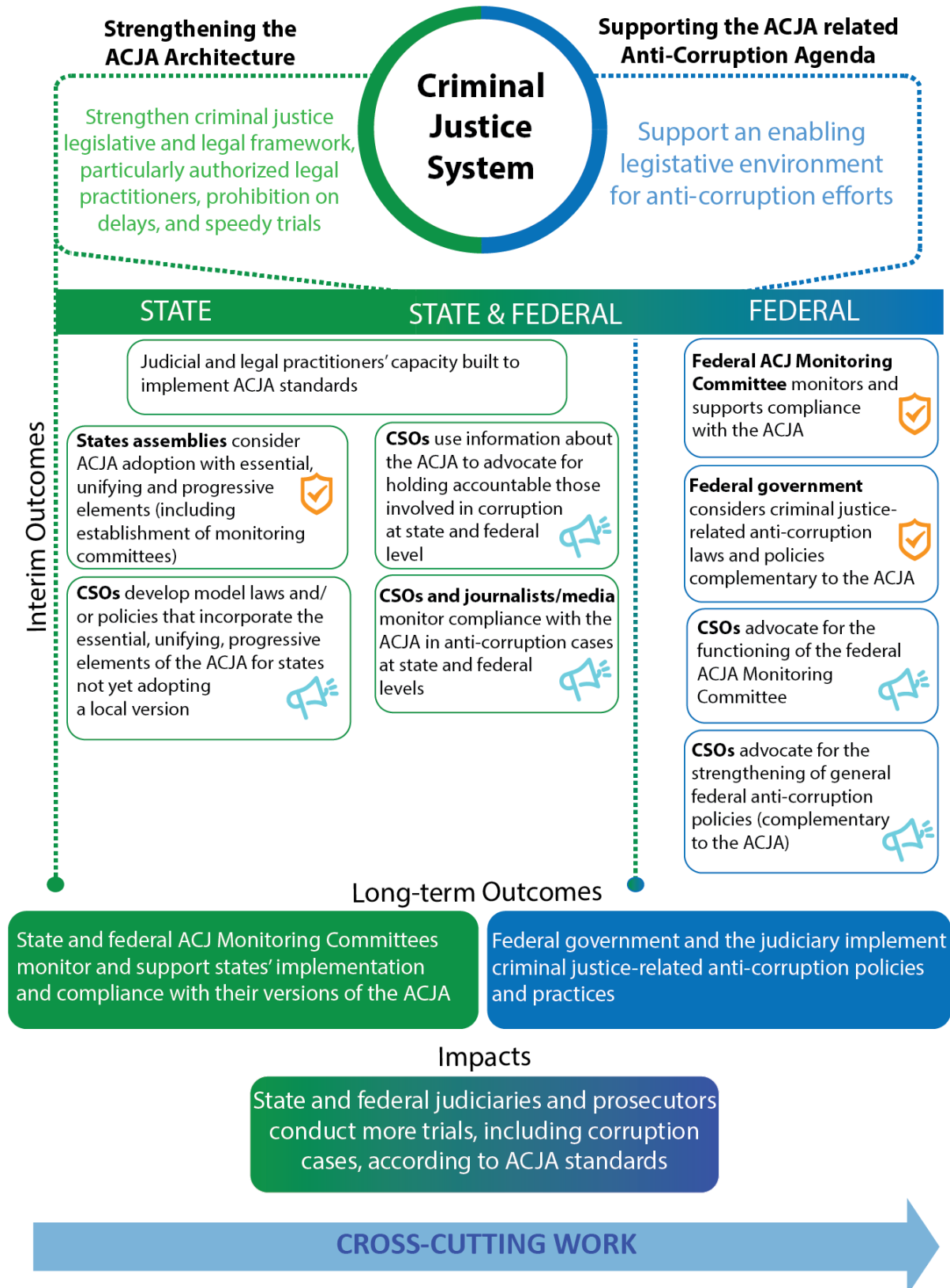
4.4.2 Criminal Justice Theory of Change

On Nigeria's efforts in criminal justice rest on the bedrock of the federal ACJA, seeking state-level consideration and implementation of parallel Administration of Criminal Justice (ACJ) state laws that include the ACJA's four essential anticorruption elements, and strengthening implementation and application of the laws everywhere. On Nigeria also strengthens and harmonizes federal anticorruption agencies, policies, and practices, and supports civil society and government in rollout, compliance with, and enforcement of the ACJA and other laws and policies complementary to the ACJA that strengthen the ability to confront corruption through the criminal justice system.

As a result, the criminal justice strategy's theory of change (illustrated below in Exhibit 34) includes approaches at both the state and federal levels.

Long-term success will be demonstrated when the (1) federal government and the judiciary implement anticorruption legislation, policies, and practices that complement the ACJA; and (2) state and federal Administration of Criminal Justice Monitoring Committees monitor and support implementation and compliance with their versions of the ACJ state laws and ACJA (respectively), incorporating the essential, unifying, and progressive elements. Impact-level success will be illustrated by state and federal prosecutors conducting more trials, including corruption cases, according to ACJA standards.

Exhibit 34: Criminal Justice theory of change



On Nigeria’s portfolio includes eight criminal justice grants to seven nationally focused organizations (one organizations is administering two grants), granted between January 2016 and July 2017, and worth \$7.7 million. These grants focus on raising criminal justice actors’ awareness and capacity related to ACJA implementation, states’ awareness for ACJ state law consideration and implementation, and judges’ and prosecutors’ capacity to try corruption cases. Grantees encourage and deepen collaboration and dialogue among these same actors at the state and federal levels. Capacity building and collaboration contribute to “voice” outcomes where civil society, the media, and criminal justice actors are monitoring the compliance and success of ACJA implementation at both the federal and state levels. On Nigeria grantees also provide technical support to national and state-level criminal justice “teeth” actors to promote the successful implementation of criminal justice-related laws and policies that complement the ACJA. Collectively, these activities will lead to a more effective criminal response to corrupt practices.

In 2020, the successful implementation of criminal justice grants will be evidenced by (1) early indications that corruption-related cases are prosecuted more rapidly and fairly (including resolution of a number of high-profile corruption cases); (2) more state assemblies consider adopting an ACJ state law (evidenced in debate and consideration in their legislatures); (3) an increasing number of states implement an ACJ state law with the essential, unifying, and progressive elements; (4) more judges, legislators, and legal practitioners are trained in and adhere to ACJA standards; and (5) courts uphold critical ACJA anticorruption aspects in strategic litigation that tests those aspects.

4.4.3 Landscape at Baseline (2015–June 2016)

The baseline period for the criminal justice module covers January 2015 through June 2016. After the passage of the federal ACJA, it is the responsibility of individual states to adopt their own version—an ACJ state law. In 2016, prior to the beginning of the On Nigeria strategy, only six states (Anambra, Ekiti, Lagos, Ondo, Oyo, and Rivers) had adopted an ACJ state law. In 2016, only the federal ACJA and Oyo state fully adopted all four essential anticorruption elements. The most commonly adopted element was speedy trials: Ondo, Oyo, and Rivers states have fully adopted this element, and Anambra, Ekiti, and Lagos states have adopted this element almost fully.

Media were reporting on some corruption-related criminal justice content. Media monitoring data show that in 2016, criminal justice keywords made up 8 percent of all corruption and anticorruption mentions related to On Nigeria (out of 2,544 total).

4.4.4 Early Progress and Momentum (July 2016–2018)



Intended Criminal Justice “Teeth” Interim Outcomes

- *The Federal Administration of Criminal Justice Monitoring Committee monitors and supports compliance with the ACJA.*
- **Federal government** considers criminal justice-related anticorruption laws and policies (complementary to the ACJA).
- **State assemblies** consider ACJA adoption with essential, unifying, and progressive elements.

Finding: The federal government is considering and enacting complementary anticorruption laws and policies, as more states are considering or have adopted an ACJ state law. Most ACJ state laws adopted after 2015 (passage of the federal ACJA) include more content that can be linked to the four essential anticorruption elements.

A lack of evidence suggests that it is too early to gauge the level of monitoring the Federal Administration of Criminal Justice Monitoring Committee has conducted. At present, it is unclear whether this committee is supporting compliance with the ACJA at the state or federal levels.

Still, there is ample evidence of progress and attempts to intensify the anticorruption fight within the criminal justice system at the federal level. Over the past several years, the federal government has enacted several complementary laws and policies that promote anticorruption efforts, including protections to whistleblowers, asset recovery, and punishments for looters (see Exhibit 35).

Exhibit 35: Timeline of federal anticorruption laws and policies complementary to the ACJA90

2017	2018
<p>May</p> <p>Executive Bill for the Mutual Legal Assistance in Criminal Matters passed into law</p>	<p>March</p> <p>All states must adhere to the Freedom of Information Act (passed in 2011) affirmed by Court of Appeal</p>
<p>June</p> <p>Witness Protection Bill passed into law</p>	
<p>July</p> <p>Whistleblower Protection Bill passed into law</p>	
<p>September</p> <p>Corruption and Financial Crimes Cases Trial Monitoring Committee established</p>	
<p>November</p> <p>Special Anticorruption Courts designated by the executive</p>	
<p>2017</p>	

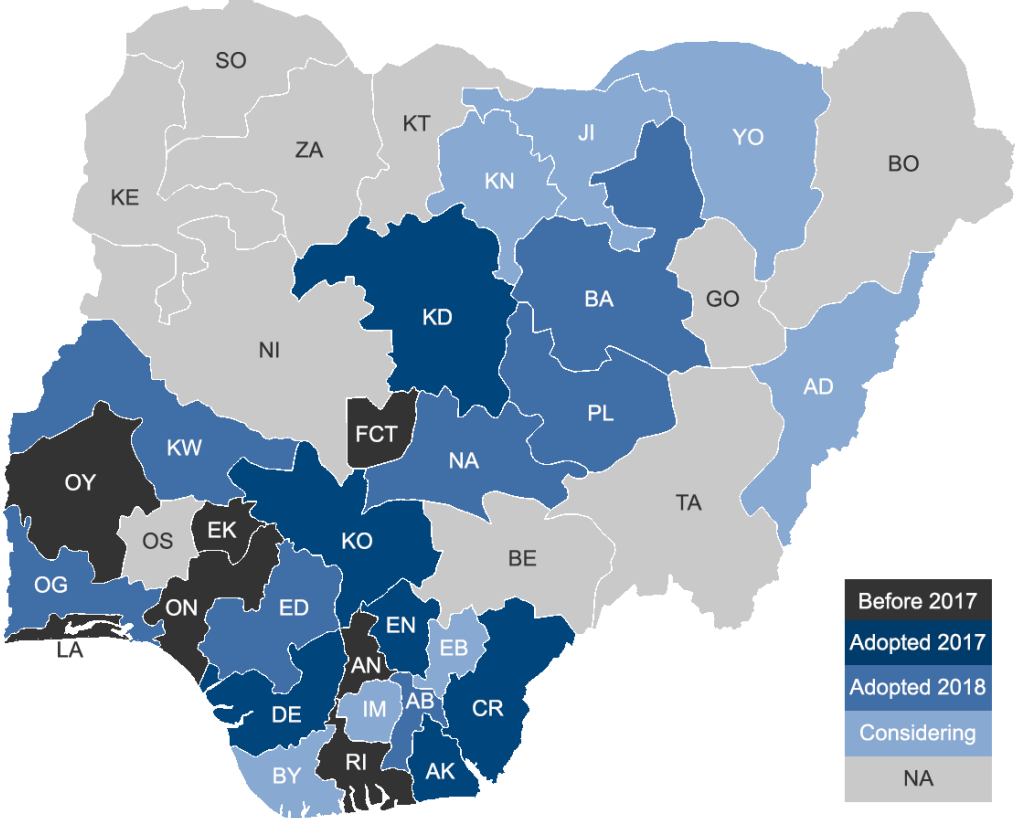
In addition to the passage of federal laws and policies, a 2017 Supreme Court of Nigeria decision upheld the ACJA ban on stay of proceedings, an essential ACJA element that can prevent interference in criminal cases, including corruption cases.⁹¹

Progress is also occurring at state level, as evidenced by the consideration and adoption of ACJ state laws. Between the beginning of 2017 and November 2018, an additional 13 states adopted an ACJ state law, bringing the total to 19 (see Exhibit 36). During this time, an additional seven states were also working on adopting an ACJ state law and at various stages in the consideration process.

⁹⁰ The National Assembly of Nigeria. 2017. *Report on a Bill for an Act to make provision for mutual assistance in criminal matters between Nigeria and other foreign states for related matters* (SB.224); Daily Post. 2017. *Senate passes Whistle Blowers’ Protection Bill, Witness Protection Bill*; Premium Times. 2018. *Freedom of Information Act applicable to all states in Nigeria, Appeal Court rules*.

⁹¹ MacArthur Foundation. 2017. *Nigeria Supreme Court Upholds Criminal Justice Act*.

Exhibit 36: States considering and adopting ACJ state laws (as of November 2018)⁹²



States adopting an ACJ state law since 2016 (after passage of the federal ACJA and the start of the On Nigeria strategy) appear to have more effectively included the four ACJA elements key to addressing corruption, as seen in Exhibit 37.

⁹² Data regarding adoption of ACJ state laws are based on information from 2018 grantee convening and Darkwa-Poku, Yvonne. 2018. *Comparative Analysis of Adopted State ACJ Laws*;

Exhibit 37: ACJ state laws and inclusion of key essential elements of the ACJA

(based on information available as of November 2018)

	Full adoption	Almost full adoption	Partial adoption	Not adopted	Not yet analyzed	No info – targeted state	No info – not targeted state
	Adopted	Qualified legal practitioners	Interlocutory appeals	Speedy trials	ACJ Monitoring Committee		
Anambra	2010						
Lagos	2011						
Ekiti	2014						
Federal ACJA*	2015						
Rivers	2015						
Ondo	2016						
Oyo	2016						
Delta	2017						
Enugu	2017						
Kaduna	2017						
Akwa Ibom	2017						
Kogi	2017						
Cross River	2017						
Edo	2018						
Kwara	2018						
Plateau	2018						
Bauchi	2018						
Abia	2018						
Ogun	2018						
Nasarawa	2018						
Adamawa Bayelsa Ebonyi Jigawa Kano Imo Osun Yobe							
Benue Borno Gombe Katsina Kebbi Niger Sokoto Taraba Zamfara							

*Covers FCT; Source: MacArthur Foundation. 2018. Analysis of State-Level ACJA Statutes



Intended Criminal Justice “Voice” Interim Outcomes

- **CSOs** advocate for the functioning of the federal Administration of Criminal Justice Monitoring Committee.
- **CSOs** advocate for the strengthening of general federal anticorruption policies (complementary to the ACJA).
- **CSOs and journalists/media** monitor compliance with the ACJA in anticorruption cases at state and federal levels.
- **CSOs** use information about the ACJA to advocate for holding accountable those involved in corruption at state and federal levels.
- **CSOs** develop model laws and/or policies that incorporate the essential, unifying, and progressive elements of the ACJA (including establishment of monitoring committees) for states not yet adopting a local version.

Finding. Grantee CSOs are involved in ACJA and ACJ state law advocacy and monitoring efforts, but have yet to employ a deeper understanding of, or focus on the four essential ACJA elements in their advocacy on holding corrupt actors accountable or including the essential elements as ACJ state laws are being developed.

Just as a lack of evidence made the extent of monitoring conducted by the Federal Administration of Criminal Justice Monitoring Committee unclear, little information emerged that detailed a role that “voice” actors are playing to contribute to this committee’s operations, although NGOs have founded a partner observatory body of CSOs with a goal of providing oversight support.⁹³

During qualitative interviews, some CSOs and grantees reported that they strengthened general anticorruption policies by actively monitoring and advocating against corruption in the criminal justice system through activities, such as developing petitions, attending public hearings, developing and using performance measurements, and by compiling dossiers on corrupt individuals.

In the recent case of [the former director-general of the Security and Exchange Commission (SEC)], we wrote petitions and were at the public hearing in Abuja; he has been permanently relieved of his job. We participated in almost all other corruption cases like the case of the [former managing director of Oceanic bank], we did series of protest marches on [redacted name] and we were instrumental to the removal of [the former Attorney General of the Federation], because we did series of protests in Lagos and Abuja asking for his removal because he was supporting corruption rather than fighting it. – Qualitative interview: Non-grantee CSO

Several grantees and CSOs have begun monitoring ACJA and ACJ state law adoption, and implementation of and state actors’ compliance with the four essential ACJA elements related to corruption by tracking cases, surveying prosecutors, and forwarding cases for review. One grantee started observing 65 courtrooms across the Abuja FCT and Lagos and Ondo states (no data yet available), and reported that advocacy visits to state judiciaries had helped gain state buy-in.⁹⁴

In qualitative interviews, grantee CSOs painted a fragmented picture of state-specific progress on ACJ state law implementation: Grantees indicate that aside from the federal-level ACJA, implementation and operationalization of ACJ elements related to corruption are the most complete in Enugu, Kaduna, Kano, and Lagos versions of the ACJ state laws.

Although CSOs and grantees are playing a role in ACJA and ACJ state law advocacy and monitoring, there is no evidence suggesting that they are using *specific* information about the four ACJA essential elements in their advocacy, or that they are working to develop models of ACJ state laws that include the four essential elements.

⁹³ Case File Nigeria. 2018. *Experience of the Civil Society Observatory Group on the ACJA 2015*.

⁹⁴ Maigari, Barbara. 2017. *Presentation on the Findings of Court Observation on ACJA in FCT*.



Intended Criminal Justice Capacity-Building Interim Outcomes

- **CSOs and journalists/media** know the content of the ACJA and other proposed anticorruption policies.
- **Targeted legal practitioners and judges** know core elements of the ACJA, generally and as related to corruption.
- **Legal institutions, judicial institutions, and CSOs** develop tools and modules on the ACJA to be incorporated into core training for stakeholders, and mandate/use them in core training curricula and continuing legal education.
- **State assemblies** have information and support they need to consider adopting the ACJA.
- **Federal government** has information and support it needs to consider anticorruption legislation (complementary to the ACJA).

Finding: Grantees are developing and using training and tools to increase capacity for ACJA statute implementation. Awareness of the ACJA existence is relatively high among legal practitioners.

Criminal justice grantees are knowledgeable about the ACJA and conduct capacity-building activities, such as developing tools and modules, initiating core training, and continuing legal education on the ACJA for key stakeholders⁹⁵ (including law enforcement personnel, judges, prosecutors, defense lawyers, registrars, and legal aid officials).⁹⁶ Grantees also began conducting training-of-trainers workshops for various criminal justice agencies and institutions. One grantee reported holding 60 capacity-building workshops for judiciary actors and prosecutors in the 2015–2018 period.⁹⁷

Three (3) years after the passage of the ACJA, a subnational 2018 survey in six states grantee CLEEN conducted indicates that most criminal justice practitioners (87 percent) in six states⁹⁸ are aware of the ACJA (see Exhibit 38), which is a significant increase from 2017 (74 percent). Practitioners learned about the ACJA or similar laws through capacity-building opportunities (training or sensitization activities), although many reported coming to know of it through television, radio, or newspaper (35 percent) and social media (8 percent) (see Exhibit 39).

⁹⁵ Grantee *Training Manual on the Administration of Criminal Justice Act*, 2015; grantee annual report, 2017.

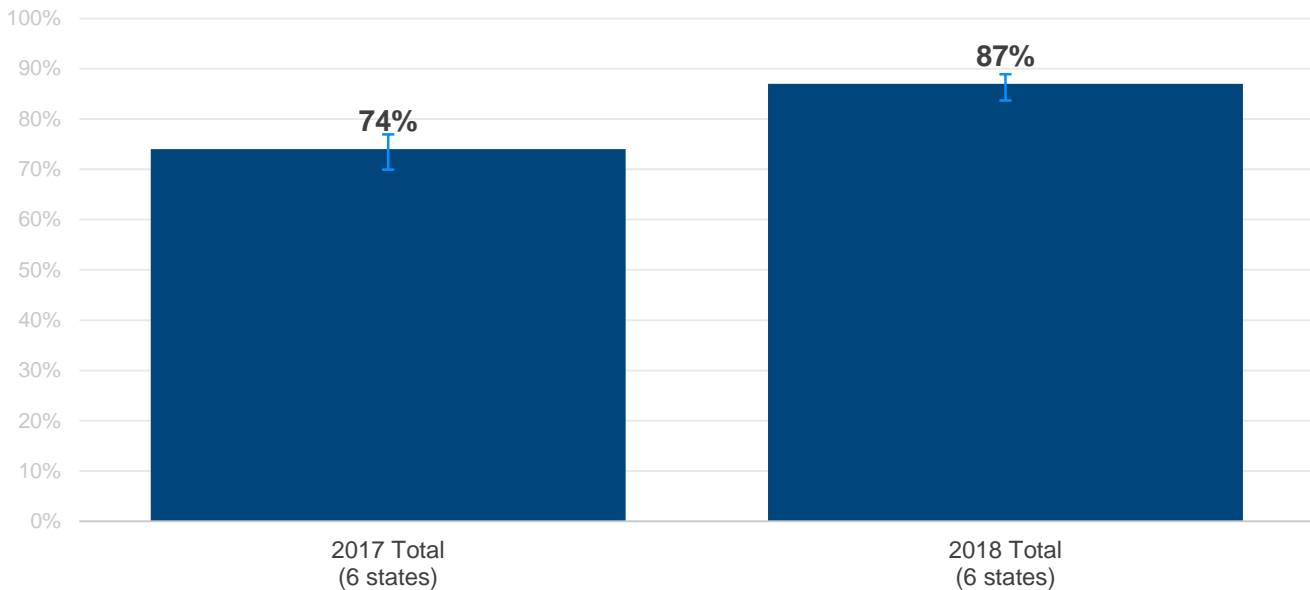
⁹⁶ Grantee annual report, 2017.

⁹⁷ Grantee annual report, 2018.

⁹⁸ CLEEN conducted this subnational survey in six states that represent Nigeria's six geopolitical zones.

Exhibit 38: Awareness of the 2015 ACJA (criminal justice practitioners)

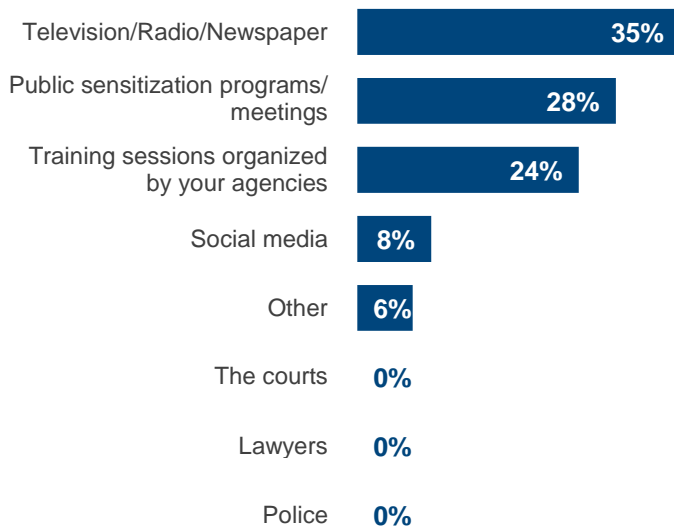
(2017 n=610 practitioners; 2018 n=659 practitioners)



CLEEN Survey, Round 1 (2017) and Round 2 (2018) in Abuja, Adamawa, Cross River, Imo, Kaduna, and Lagos states

Exhibit 39: Source of information for knowledge about the 2015 ACJA or any other law(s) on criminal justice administration in their state (more than one answer possible)

(n=618 practitioners)



CLEEN Survey Round 2 (2018) in Abuja, Adamawa, Cross River, Imo, Kaduna, and Lagos states

In qualitative interviews, grantees and non-grantee CSOs reported that they still viewed current levels of awareness of the advantages of ACJA implementation as insufficient. Most interviewees identified multiple stakeholder groups that remained resistant to ACJ state laws and ACJA implementation that incorporate all four essential elements for anticorruption, which they link to both reluctance to change and ignorance of the ACJA, rather than malicious intent. However,

grantees and non-grantee CSOs also believe some corrupt officials, aware of the ACJA, are creating active resistance because they see it as threatening their ability to continue unscrupulous practices.

... Some of the states will not see the advantage of having the ACJA. Corruption among judicial officers who are not interested in giving up what gains they have in the old order, can also be a huge challenge in ACJA adoption. – Qualitative interview: Non-grantee CSO

Although promoting public awareness of the ACJA is not an explicit On Nigeria’s focus, the public’s knowledge reflects media exposure. While the 2018 CLLEN subnational survey showed low levels of knowledge—only 18 percent of the public respondents were aware of the ACJA—most of these (77 percent) learned of it through television, radio, and newspaper (see Exhibit 39). In 2018 media monitoring, however, criminal justice mentions remained low and fell from 8 percent in 2016 to 5 percent of total mentions (out of 2,240 total).

No evidence emerged that signified whether state assemblies and federal government have the information and support needed to consider adopting the ACJ state law or other anticorruption legislation.



Intended Criminal Justice Collaboration Interim Outcomes

- **Criminal justice and anticorruption agencies** demonstrate improved coordination.
- **CSOs** participate in the federal Administration of Criminal Justice Monitoring Committee.
- **Cross-Cutting: Journalists/media and CSOs** share information about government anticorruption promises, activities, and wins related to criminal justice.

Finding: CSOs are collaborating, especially through the Civil Society Observatory on the Administration of Criminal Justice, but there is still room for improved CSO collaboration as well as anticorruption inter-agency coordination.

Although one grantee reported that criminal justice monitoring committees needed improved collaboration and inter-agency coordination,⁹⁹ grantees and CSOs are coordinating and participating in the federal Administration of Criminal Justice Monitoring Committee and monitoring committees in at least two states, Lagos and Ondo.¹⁰⁰

NGOs, including grantees, founded an observatory body of CSOs to provide oversight support for monitoring committees the ACJA set up.¹⁰¹ In qualitative interviews, grantees reported that this observatory body was a valuable opportunity for criminal justice CSOs to collaborate and present a united front to the government.

⁹⁹ Grantee *Presentation on the Findings of Court Observation on ACJA in FCT*, 2017.

¹⁰⁰ *Ibid.*

¹⁰¹ Grantee *Experience of the Civil Society Observatory Group on the ACJA 2015*, 2018.

[I]n the formation of this network, we now have focal persons in all these organizations of stakeholders that you can call, once you think something is going wrong. Whoever is representing the police, if something is going wrong, we quickly make our reports to him. If the police also notices that something ought to have been done, that they didn't do, they have a focal person to call, you have somebody to hold responsible. – Qualitative interview: Grantee CSO



Intended Criminal Justice Long-Term Outcomes

- **Federal government and the judiciary** implement criminal justice-related anticorruption policies and practices.
- **State and federal Administration of Criminal Justice Monitoring Committees** monitor and support states' implementation and compliance with their versions of the ACJA.

Finding: Implementation of and satisfaction with ACJA and similar state laws vary greatly across Nigeria, although optimism about their potential is considerable, and grantees are advocating for and monitoring progress.

After the adoption of federal anticorruption laws and policies complementary to the ACJA (Exhibit 35), there have been examples of effective implementation, as well as wins at the court level—for example, within 6 months (as of November 2018), special anticorruption courts delivered judgement in at least 354 cases and several tips resulting from the whistleblower policy (see box).¹⁰²

Although emerging progress merits celebration, in qualitative interviews, CSOs noted some concern about effective enforcement and implementation after the passage of laws and policies.

Policies are everywhere... but the issue is enforcement and implementation [has] now become a problem. So, it's not a question of creating more policies. – Qualitative interview: Non-grantee CSO

Additionally, a report issued in April 2018 noted there were more whistleblower complaints at the rank of federal-level grand-scale corruption, and few complaints issued at the state and local levels.¹⁰³ However, as some evidence reported under the

Progress – Whistleblower Policy

As of May 2018, the Ministry of Finance received 8,373 communications containing 1,231 specific whistleblowing tips. These tips resulted in 791 investigations (with 534 completed), four convictions, and 10 individuals being prosecuted. The unit has recovered:

N13.8 billion (\$38.1 million) from tax evaders
N7.8 billion (\$21.6 million) from public officials

Government of Nigeria. 2018. Buhari Administration 3rd Year Report/Factsheet

¹⁰² Galadima, Suleiman. 2018. *Keynote address by the Chairman at the one-day interactive workshop for heads of courts.*

¹⁰³ Armsfree, Ajanaku. 2018. *Grand narratives and citizen participation in fight against corruption.*

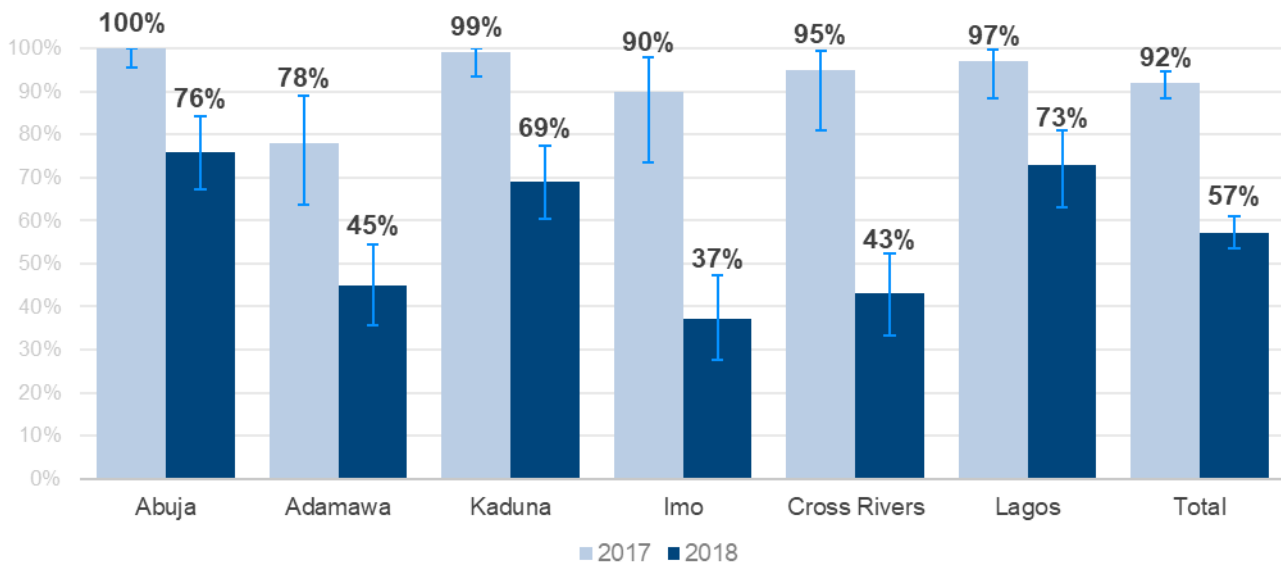
strategy shows, there have been allegations that prosecution is politically motivated and targeting the opposition, while members of the administration go unpunished.

Among criminal justice practitioners, one grantee’s 2018 subnational survey in six states points to varying satisfaction with ACJA and its implementation thus far. For example, the majority of criminal justice practitioners in Abuja FCT (76 percent), Kaduna (69 percent), and Lagos (72 percent) reported that they were “satisfied” or “very satisfied” with ACJA and similar state law implementation. For the remaining three states in the survey, fewer practitioners registered satisfaction: only 45 percent in Adamawa, 43 percent in Cross River, and 37 percent in Imo, although Cross River only adopted its ACJ state law in 2017. Satisfaction rates among practitioners fell significantly between 2017 and 2018 across all six states surveyed; however, differences for the general public were not significant (see Exhibit 40). Data only became available late in 2018; thus, there was yet no evidence explaining the potential decline among practitioners.

Exhibit 40: Level of satisfaction with implementation of the ACJA or any state law(s) on criminal justice administration (2017 and 2018 grantee survey)

(2017 n=336 practitioners; 2018 n=659 practitioners)

Practitioners who are "satisfied" or "very satisfied" with the implementation of ACJA and similar laws (%)





Intended Criminal Justice Impacts

- **State and federal judiciaries and prosecutors** conduct more trials, including corruption cases, according to ACJA standards.

Finding: Anticorruption federal agencies are working to adopt and encourage effective implementation of anticorruption laws and policies that complement the ACJA and work to institutionalize a criminal justice landscape that accommodates the successful facilitation of anticorruption efforts. Some tangible results in the administration of justice are beginning to emerge.

A number of organizations have a role in monitoring ACJA and ACJ state law implementation, and ensuring that state and federal judiciaries and prosecutors adhere to its standards. CLEEN’s subnational 2018 survey indicated that the general public and practitioners felt these organizations were performing their monitoring responsibilities. Significantly more practitioner respondents assessed the performance of each of five agencies as “good” or “very good:” (1) ACJA Monitoring Committee, (2) National Human Rights Commission, (3) the judiciary, (4) Legal Aid Council, and (5) NGOs; more than two-thirds of respondents provided this assessment for each agency and there was little variation across the agencies. Among the general public respondents, the majority also considered performance of the five agencies as “good” or “very good.” Respondents listed NGO monitoring performance as “good” or “very good” in higher proportions (71 percent) than other agencies, such as the National Human Rights Commission (67 percent), the ACJA Monitoring Committee (55 percent), and the judiciary (55 percent).¹⁰⁴

During qualitative interviews, grantees, government officials, and non-grantee CSOs noted that some tangible improvements in the administration of justice were beginning to emerge, particularly at the federal level and in Lagos: Grantees reported speedier trials and increased case prosecution, as well as the elimination of some interlocutory appeals. Grantees, CSOs, and government stakeholders reported, in qualitative interviews, that some states that adopted an ACJ state law had not been able to implement all of the act’s provisions and state capacity remained highly uneven.

4.4.5 Changing Landscape (2017–2018)

Although the number of ACJ state laws adopted is increasing, a challenge remains in inclusions of all four essential ACJA elements. There are pockets of resistance among varied groups—corrupt actors who are content with the current fractured system. At the November 2018 Grantee Convening, participants stated that economic and religious factors could impede



¹⁰⁴ CLEEN. 2018. *CLEEN Survey, Round 2*.

adoption and implementation. Grantees reported that in some northern, Muslim-populated states, concerns that an ACJ state law was not compatible with Shari’a law limited adoption.

4.4.6 Assumptions

Legally, the MacArthur Foundation cannot support lobbying for specific government laws and policies, and the theory of change operates on the assumption that legislators request On Nigeria’s support for information and will take the necessary steps to use that information to pass legislation. To date, data from qualitative interviews indicate that these assumptions appear to hold, and that momentum in state adoption reflects a continued open window of opportunity to strengthen the criminal justice system overall and in the fight for corruption. Limited data were available about government requests to CSOs for support and other partners’ efforts to ensure proper corruption case procedures from police arrest through prison.

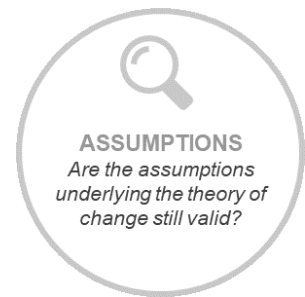


Exhibit 41: Level of assumption confirmation

Confirmed: ; Mixed: ; Rejected: ; Insufficient Evidence:

Assumption	Level of Confirmation
States are motivated to adopt and implement ACJA.	
CSOs advocate for effective anticorruption policy by providing technical support and information to the government upon request or invitation by a legislative body.	
State assemblies adopt state versions of the ACJA that include its essential, unifying, and progressive elements.	
Federal government passes criminal justice-related anticorruption laws and policies complementary to the ACJA.	
Other partners support other key technical elements of the ACJA not addressed by On Nigeria, such as arrest protocols, electronic recordings of proceedings, payment of witness expenses, and documentation and data collection on arrested persons and crimes.	
Other partners support capacity building of other criminal justice system agencies (e.g., police and prisons) to ensure that corruption cases are followed from arrest through prison.	

4.4.7 Summary and Conclusions of the Criminal Justice Module in 2018

On Nigeria has contributed to laying the groundwork for a more uniform and effective criminal justice system that is better able to combat corruption, as seen by the momentum of states adopting versions of an ACJ law and the federal government adopting complementary laws and policies, with some emerging results in the anticorruption fight. Training systems are being put in place in legal and judicial institutions, and some states are including monitoring committees to ensure compliance with the ACJ state laws, following the ACJA model.

Despite these successes, challenges related to building capacity persist within the sector—a 2018 report from the Chief Justice of Nigeria indicates that poor budgetary allocations, inadequate personnel, and absence of resources are slowing the pace of corruption cases in the courts.¹⁰⁵ Although CSOs and grantees are advocating for the implementation of monitoring committees at the state level,¹⁰⁶ there are challenges in obtaining complete information on the number and status of monitoring committees active by state, which limits the ability to assess progress to date. Solid information on cases adhering to ACJA standards is not yet available either. Exhibit 42 summarizes progress (shown in yellow or green status for each criminal justice outcome).

The window of opportunity in the criminal justice sector continues to be open, as evidenced by the increase of states’ consideration and adoption of an ACJ state laws. Additionally, states adopting more recently appear more likely to include the four 2015 ACJA elements key to the anticorruption legal framework. However, reluctance at the state level, a lack of strong monitoring committees, and the exclusion of essential elements still hamper progress for a uniform and effective criminal justice system capable of combatting corruption.

Exhibit 42 also indicates where the 2018 data were inadequate to reveal progress for some outcomes. Challenges in obtaining complete information on the number and status of monitoring committees active by state limit the ability to assess progress to date. Solid information on cases adhering to ACJA standards is not yet available.

Exhibit 42: Criminal justice outcomes and progress

- Substantial progress: Clear signs of movement since the beginning of On Nigeria
- Moderate progress: Some momentum visible since the beginning of On Nigeria
- No progress or regression: No indications of movement since the beginning of On Nigeria or a worsening of the situation
- Inadequate or no data available to assess progress

Interim Outcomes – Capacity Building: Do “voice” and “teeth” actors have the capacity and knowledge they need?

- 1 CSOs and journalists/media know the content of the ACJA and other proposed anticorruption policies.
- 2 Targeted legal practitioners and judges know core elements of the ACJA, generally and as related to corruption.
- 3 Legal institutions, judicial institutions, and CSOs develop tools and modules on the ACJA to be incorporated into core training for stakeholders, and mandate/use them in core training curricula and continuing legal education.
- 4 State assemblies have the information and support they need to consider adopting the ACJA.
- 5 Federal government has the information and support it needs to consider anticorruption legislation (complementary to the ACJA).

Interim Outcomes – Collaboration: Are actors collaborating to leverage success and build pressure for change?

- 6 Criminal justice and anticorruption agencies demonstrate improved coordination.
- 7 CSOs participate in the federal Administration of Criminal Justice Monitoring Committee.

¹⁰⁵ Premium Times. 2018. *BREAKING: CJN Panel submits report, identifies reasons for slow pace of corruption cases in courts*

¹⁰⁶ Grantee project report, 2018.

- 8 Cross-Cutting: Journalists/media and CSOs share information about government anticorruption promises, activities, and wins related to criminal justice.

Interim Outcomes – “Voice:” Are “voice” actors engaging in advocacy and monitoring?

- 9 CSOs advocate for the functioning of the federal Administration of Criminal Justice Monitoring Committee.
- 10 CSOs advocate for the strengthening of general federal anticorruption policies (complementary to the ACJA).
- 11 CSOs and journalists/media monitor compliance with the ACJA in anticorruption cases at state and federal levels.
- 12 CSOs use information about the ACJA to advocate for holding accountable those involved in corruption at state and federal levels.
- 13 CSOs develop model anticorruption laws and/or policies that incorporate the essential, unifying, and progressive elements of the ACJA (including establishment of monitoring committees) for states not yet adopting a local version.

Interim Outcomes – “Teeth:” Are “teeth” actors operating transparently and holding others accountable?

- 14 The federal Administration of Criminal Justice Monitoring Committee monitors and supports compliance with the ACJA.
- 15 Federal government considers criminal justice-related anticorruption laws and policies (complementary to the ACJA).
- 16 State assemblies consider ACJA adoption with essential, unifying, and progressive elements.

Long-Term Outcomes: Are improvements institutionalized and social norms shifted in targeted states?

- 17 Federal government and the judiciary implement criminal justice-related anticorruption policies and practices.
- 18 State and federal Administration of Criminal Justice Monitoring Committees monitor and support states’ implementation and compliance with their versions of the ACJA.

Impacts: Are improvements institutionalized and social norms shifted nationwide?

- 19 State and federal judiciaries and prosecutors conduct more trials, including corruption cases, according to ACJA standards.

4.5 Media and Journalism

4.5.1 Background

Nigeria has a vibrant media ecosystem. It includes public and commercial media, and a nascent but growing independent media whose history is inextricably tied to political struggle. There are more than 100 locally and nationally distributed news publications, with the most powerful being privately owned.¹⁰⁷ While the Constitution of Nigeria guarantees freedom of expression and the rights of the press to “uphold the responsibility and accountability” of government, the media’s capacity to serve as a watchdog and create a truly free press in Nigeria is still limited.^{108,109}

¹⁰⁷ Freedom House. *Freedom of the Press Nigeria Report: 2015*.

¹⁰⁸ *Constitution of the Federal Republic of Nigeria: 1999*.

¹⁰⁹ The Paris-based *Reporters Without Borders’* annual freedom index ranked Nigeria’s press 111 out of 180 countries, and the U.S.-based organization *Freedom House* deemed the Nigerian media only “partially free.”

The rise of social media and digital technologies, especially the dramatic growth of smartphone use,¹¹⁰ has created new distribution channels that are only beginning to be explored. Digital platforms allow new independent media outlets to operate at the lower costs of online publishing.

4.5.2 Media and Journalism Theory of Change

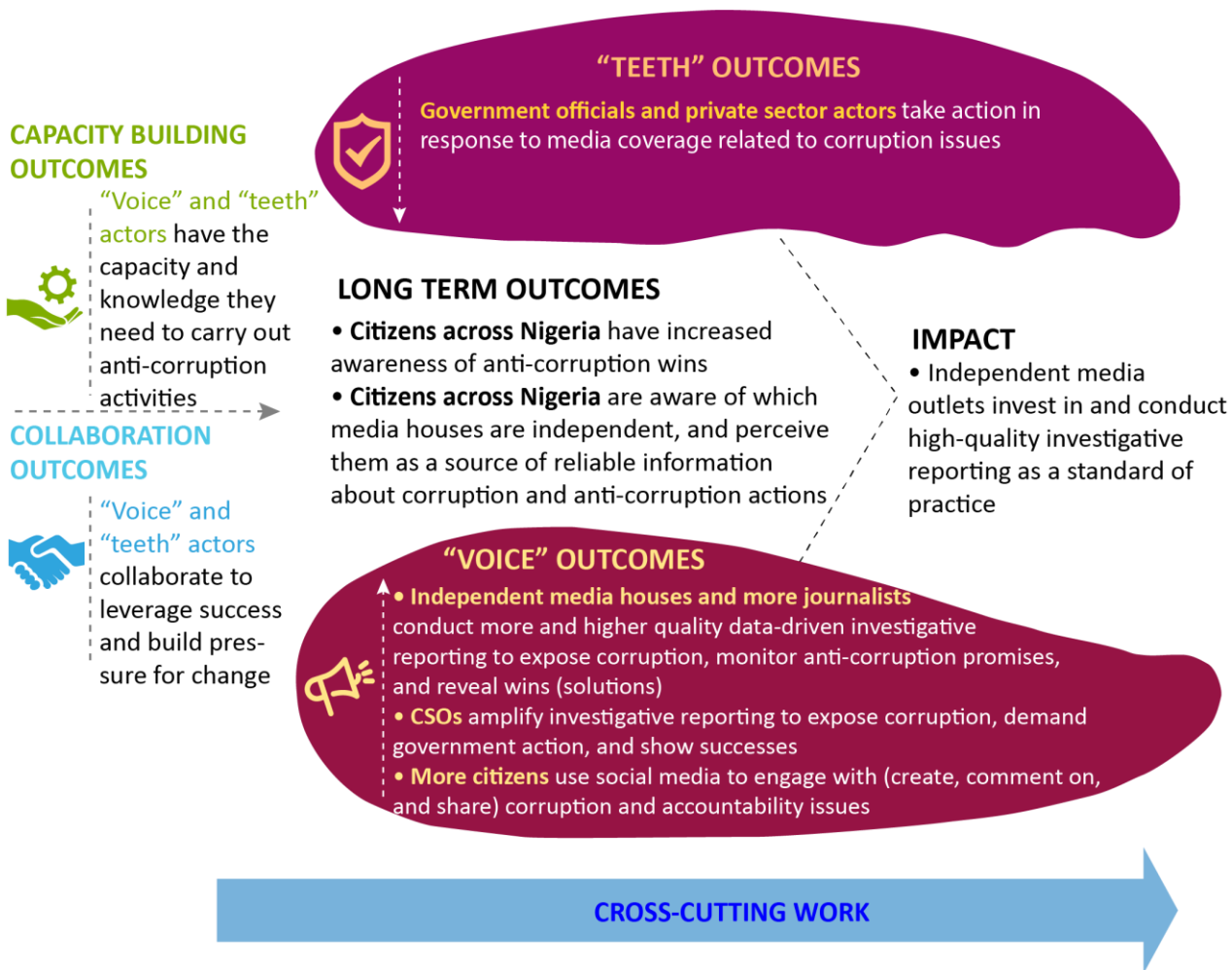
Within a corruption control and response ecosystem, media and journalism can provide a crucial lever to promote transparency and accountability by investigating corrupt practices, amplifying anticorruption efforts, and creating pressure on government actors and others in positions of power. The media and journalism theory of change, depicted in Exhibit 43 in the form of the “sandwich” strategy (and shown in more detail in Annex 1) emphasizes the media’s key role in the creation and amplification of content related to corruption issues and anticorruption efforts across On Nigeria-focused sectors. On Nigeria seeks to strengthen the capacity of the media and journalism field to play a stronger role in promoting accountability and facilitating transparency.¹¹¹ Activities also seek to augment collaboration between civil society and the media to (1) create a virtuous cycle where the media investigate and report on wrongdoing (discovered either through independent inquiry or tip-offs by CSOs, whistleblowers, citizens, and other civil society actors), while civil society takes up those reports for advocacy to put pressure on “teeth” actors to play their role, and (2) have media report on CSOs’ anticorruption wins, amplifying them and contributing to change in social norms, such as citizens’ tolerance for corruption and demand for anticorruption action.

Long-term success in this module will be apparent if Nigerian citizens (1) are increasingly aware of anticorruption wins and (2) view independent media houses as sources of reliable information on corruption and anticorruption actions. Success in independent media outlets will be demonstrated through increased investment in skills building for journalists and editors, along with more funding for conducting investigative reporting on corruption and anticorruption that is of high-quality and consistently practiced.

¹¹⁰ Nigerians have more than 23 million smartphones that carry data. (See: *IT Pulse. Nigeria ranked 17th in global smartphone use.* June 4, 2015.)

¹¹¹ On Nigeria is not directly addressing corruption within the media and journalism field.

Exhibit 43: Media and Journalism theory of change



On Nigeria’s portfolio includes 16 nationally focused media and journalism grants, with nine granted in January 2017 and worth \$5 million that are covered in these data.¹¹² Of these nine grantees, five are independent media outlets (four online publications and one print publication), and four are media-focused organizations or foundations that promote quality investigative journalism, free press, and capacity building.

These grants focus on strengthening “voice” by increasing independent, data-driven journalism—including high-quality investigative journalism—about corruption and anticorruption efforts. The nine grants support capacity building of journalists in corruption and anticorruption reporting; promote sustainable business models for independent media; provide funds and competitions to support and expand investigative reporting; and foster collaboration among media, activists, and CSOs.

¹¹² Three media and journalism grants, worth an additional \$2.56million, began in October 2018, after the 2018 data collection was completed.

In 2020, the successful implementation of media and journalism activities will result in (1) more journalists trained in investigative reporting and capable of writing about education, electricity, and anticorruption, transparency, and accountability; (2) more journalists conducting, and media houses supporting, high-quality, data-driven investigative reporting; (3) more corruption-related reporting in local language media;¹¹³ and (4) civil society using investigative reporting to put pressure on government and private-sector actors to take action on corruption, transparency, and accountability. Success will also mean government officials take action in response to media coverage related to corruption issues and subsequent CSO pressure.

4.5.3 Landscape at Baseline (2015–2016)

The baseline period for the On Nigeria media and journalism efforts covers 2015 through the start of On Nigeria media and journalism grants in January 2017. During this time, Freedom House considered Nigeria’s Freedom of the Press as “partly free,” and cited a number of obstacles that prevented the media from fulfilling their role as watchdogs, including instances of threats to journalists and suppression as they tried to confront those in power and expel biases.^{114,115} Many traditional news outlets (most owned by the political and corporate elite) were struggling to stay afloat.

At baseline, Nigerians reporting that they accessed news from Internet sources a few times a week or more had more than doubled from just 3 years prior (from 15 percent in 2012 to 31 percent in 2015).¹¹⁶ During 2015 elections, social media emerged as a tool to engage citizens, and provide greater transparency and accountability of government officials and commercial interests. Results from the Afrobarometer Round 5 (2015) showed that Nigerians residing in urban areas (40 percent of all urban respondents accessed the news via social media at greater rates than those living in rural areas (24 percent of rural respondents). Afrobarometer Survey Round 5 data also showed that males and females accessed news via social media at similar rates in 2015 (33 and 29 percent, respectively; the difference is not significant). Additionally, a 2018 BBC article reported that in August 2016, about 16 million Nigerians were active (monthly users) on Facebook.^{117,118}

Media monitoring data for all of 2016 indicate that the media were conducting corruption-related reporting: 13 percent (35,199) of all print and online articles published (270,524) by 12 sampled media sources focused on corruption-related issues. Of the universe of corruption-related reporting, a total of 1,266 articles were related to sectors On Nigeria works in, including both the five modules

¹¹³ This result will be covered by the three new grants in late 2018.

¹¹⁴ Freedom House. *Nigeria Freedom of the Press*. 2016, 2017.

¹¹⁵ Human Rights Watch. *World Report, Nigeria*. 2019.

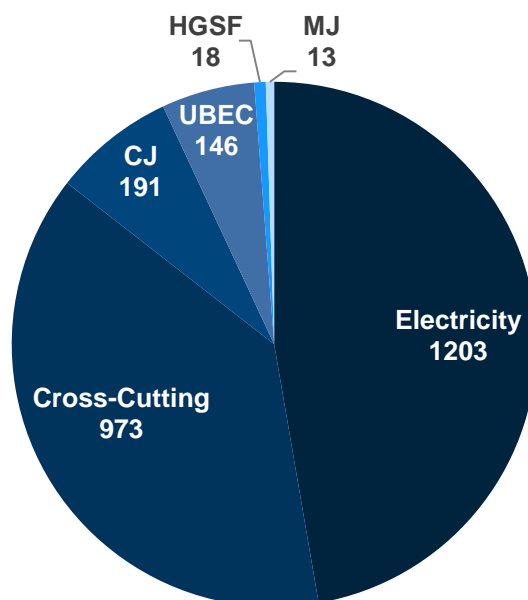
¹¹⁶ Afrobarometer. 2015: *Summary of Results: Afrobarometer Round 5 Survey in Nigeria, Q13D* (n=2,400) [95% CI: +/- 2%] Afrobarometer. 2015: *Summary of Results: Afrobarometer Round 6 Survey in Nigeria, Q12D* (n=2,400) [95% CI: +/- 2%].

¹¹⁷ BBC News. 2018. *Like. Share. Kill*.

¹¹⁸ Afrobarometer. 2015: *Summary of Results: Afrobarometer Round 6 Survey in Nigeria, Q12E* (n=2,400) [95% CI: +/- 2%].

and the cross-cutting strategy work. Corruption-related reporting can focus on exposing and investigating corruption itself (corruption evidence), anticorruption efforts, or something more neutral (see Annex 2 for more details on the media monitoring methods, perspectives, and sample). Among On Nigeria-related reporting in 2016, 40 percent of mentions were related to corruption evidence, while 15 percent were related to anticorruption efforts. The remaining 45 percent of mentions had a neutral focus. Reporting on the electricity sector predominated among On Nigeria-related news in 2016, representing 4 percent of total mentions, as seen in Exhibit 44. The cause of predominance of reporting on electricity in 2016 is not known, but this coincides with the start of presidency of Muhammadu Buhari whose campaign promised his administration would ensure the generation, transmission, and distribution of electricity on a “24/7 basis by 2019,” as well as with the appointment of Babatunde Fashola as the Minister of Power, Works and Housing.

Exhibit 44: Number of module-specific mentions for 2016



An assessment of the quality of investigative reporting for 2016 focusing on On Nigeria’s targeted sectors—education and electricity—showed the quality of investigative journalism was weak, with fewer than half a percent qualifying as in-depth, proactive, and meeting the five quality standards for investigative journalism.^{119,120}

¹¹⁹ Those that did meet investigative standards in 2016 were future MacArthur Foundation grantees.

¹²⁰ See Annex 4, Investigative Reporting Quality Analysis rubric, for more details about investigate journalism standards for quality.

4.5.4 Early Progress and Momentum (2017–2018)



Intended Media and Journalism “Teeth” Interim Outcomes

- **Government officials and private-sector actors** take action in response to media coverage related to corruption issues.

Finding: Emerging evidence indicates that government is visibly responding to media corruption coverage, sometimes by addressing the issue and sometimes by skirting it.

Corruption-related media reports are influencing state and federal government officials, as well as other important actors, such as DISCO management. Exhibit 45 shows some examples of actions taken after media published reports.

Exhibit 45: Examples of government’s responses to media coverage (2016–2018)



In qualitative interviews with grantees, media outlets and those supporting them noted that governments’ responsiveness to corruption-related media coverage was increasing because the media, CSOs, and citizens were creating greater public scrutiny, particularly through social media. However, the reaction was not always positive or productive: The government had often responded with mere promises of accountability (but no effective action) or more aggressive tactics that targeted the reporter, media house, or publisher.

These days, the response is faster than it used to be even if it is just to tell lies. A senior (high-ranking) civil servant told me that the only people fighting corruption are the online journalists because the fear of a document showing up on the Internet restrains many people; they are not concerned with traditional media because very few in traditional media are interested in investigative journalism except for maybe The Punch, The Nation and Daily Trust. Government does respond positively, but sometimes it is only window dressing. – Qualitative interview, 2018: Grantee media house

However, government often fails to cooperate with media outlets. One grantee noted difficulties to access official documents, obtain information through the FOIA, and get government officials to address issues discovered in investigative reports.¹²¹ At the November 2018 Grantee Convening, media and journalism grantees confirmed that most FOIA requests did not elicit timely or sometimes any response. Reboot is working with partners to forge a coalition for independent journalists to protect freedom of press and resist government’s intimidation by tracking and responding to government’s interference in a coordinated and sustained fashion.¹²²



Intended Media and Journalism “Voice” Interim Outcomes

- **Independent media houses and more journalists** conduct more and higher-quality investigative reporting driven by data to expose corruption, monitor anticorruption promises, and reveal wins (solutions).
- **CSOs** amplify investigative reporting to expose corruption, demand government action, and show successes.
- **More citizens** use social media to engage with (create, comment on, and share) corruption and accountability issues.

Finding: While the volume of corruption-related reporting appears similar in 2016 and 2018, its focus appears to be shifting, with more emphasis on corruption evidence, particularly from grantee media sources. CSOs and media are amplifying each other’s “voice” efforts.

Media monitoring data show that sampled media outlets continued reporting extensively on corruption- and anticorruption-related content in 2018, with changes in both perspective and topic; while there was a slight decrease in overall corruption-related reporting among sampled outlets, the amount of reporting related to areas On Nigeria works in increased as measured by the number of articles.¹²³ In 2018, media monitoring data show a total a 31,748 corruption-related stories among sampled print and online media sources, representing 8 percent of 382,210 total stories and a slight decrease in absolute terms from 2016 (see Exhibit 49). Among this reporting, there were a total of 2,240 mentions related to On Nigeria cross-cutting and module keywords—an overall decrease of 12

¹²¹ Ibid.

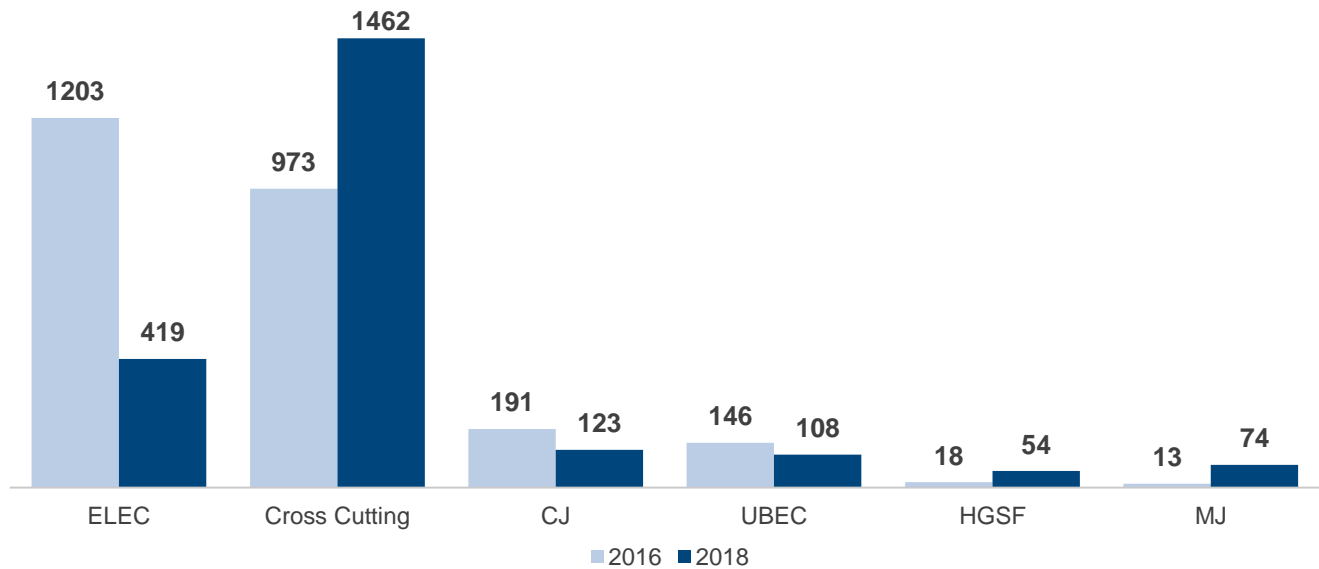
¹²² Grantee annual report, 2017.

¹²³ For the purposes of this report, the media monitoring analysis includes quarterly data from 2016 and 2018. The 2019 synthesis report will include data from 2016, 2017, 2018, and the first two quarters of 2019.

percent from 2016 (2,544 mentions).¹²⁴ Compared to 2016, corruption- and anticorruption-related mentions within the electricity, UBEC, and criminal justice modules decreased in 2018, while cross-cutting, HGSF, and media and journalism mentions increased, as see Exhibit 46.

Exhibit 46: Number of module-specific mentions for 2016 and 2018

(2016, n=24 media outlets; 2018, n=26 media outlets)
 1,571 mentions, 2016; n=778 mentions, 2018)



On Nigeria grantees contributed significantly to corruption- and anticorruption-related reporting in 2018. In 2016, media monitoring tracked reporting of corruption-related content by three media and journalism grantees (out of 24 total media sources monitored). These grantee sources produced 14 percent of total corruption-related mentions from media monitoring data.

Grantee-produced corruption-related reporting increased to 33 percent in 2018.¹²⁵ Grantee media sources reported more on corruption evidence than non-grantee media outlets and produced less neutral reporting for both 2016 and 2018 (Exhibit 47 and Exhibit 48).

¹²⁴ This analysis excludes new keywords added in 2018 related to On Nigeria’s work in elections, faith-based leadership, and edutainment; these keywords accounted for 36 percent of mentions in the first half of 2018.

¹²⁵ In 2018, media monitoring added two additional grantee sources, bringing the total media outlets monitored to 26 (five grantees).

Exhibit 47: Media perspectives summary, 2016

(n=24 media outlets; non-grantee media = 2,304 mentions, grantee media = 240 mentions)

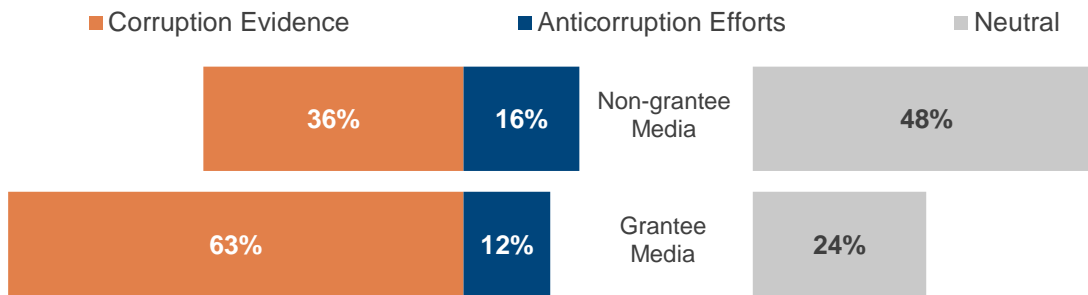
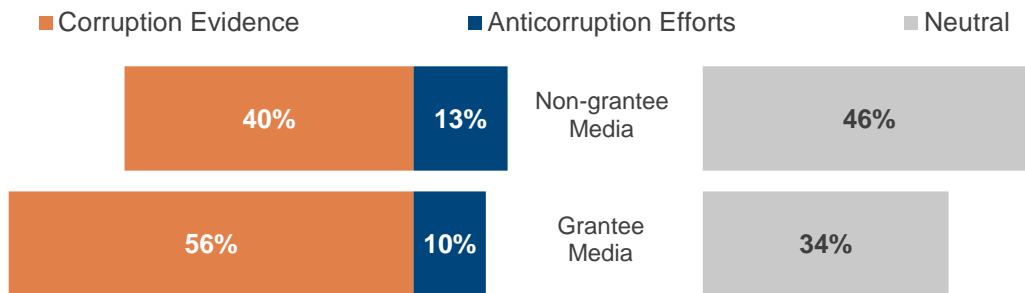


Exhibit 48: Media perspectives summary, 2018

(n=26 media outlets; non-grantee media = 1,969 mentions, grantee media = 271 mentions)



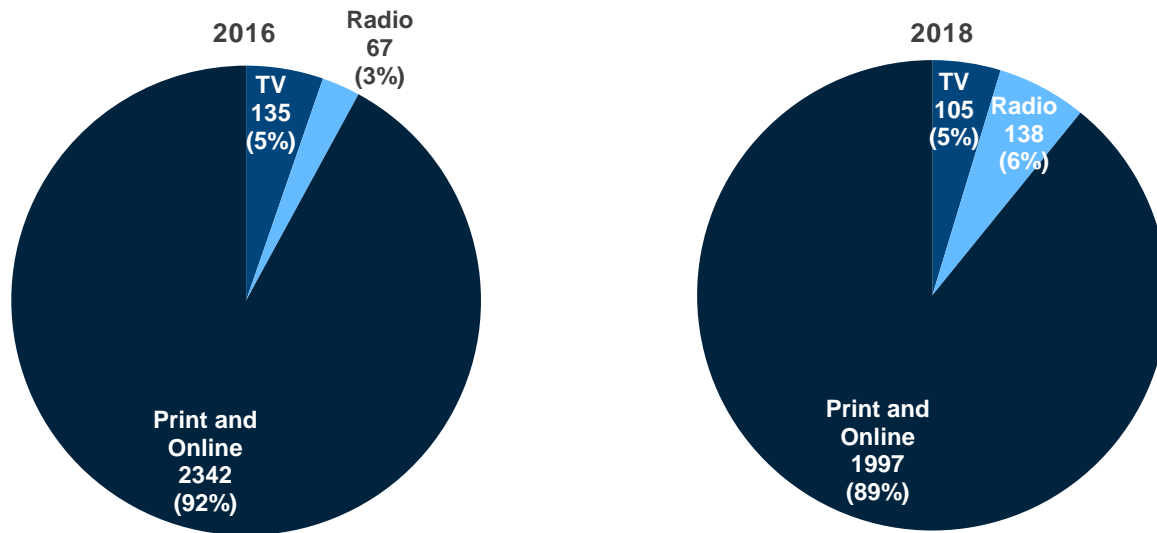
Media reporting in 2018 appears to focus slightly more on evidence of corruption than in 2016 (46 compared to 40 percent, respectively), with slight shifts away from neutral reporting and reporting on anticorruption efforts and wins.

Increasing citizens’ awareness of anticorruption efforts is a key component of the On Nigeria efforts. In both 2016 and 2018, HGSF had the greatest proportion of mentions related to anticorruption efforts (71 percent), followed by UBEC (31 percent). Only 10 percent of criminal justice mentions and 11 percent of electricity mentions were related to anticorruption efforts.

The relative volume of corruption-related reporting varied widely across media source types. Exhibit 49 shows changes from 2016 to 2018, with print and online media sources accounting for a relatively large share of corruption-related content relevant to On Nigeria’s work.

Exhibit 49: Number of corruption-related mentions by media type, 2016 and 2018

(2016, n=24 media outlets; 2018, n=26 media outlets)



On Nigeria Media Monitoring, 2016; On Nigeria Media Monitoring, 2018

There are instances of civil society amplifying corruption-related investigative reporting. In 2016, one grantee joined the international press consortium investigating the Panama Papers and subsequently published over 30 stories revealing the secret offshore assets of prominent Nigerians. These investigations sparked outrage among civil society, and CSOs were among those who placed public pressure on the government, which eventually opened files on those listed in the Panama Papers and began its own investigations.¹²⁶

In qualitative interviews, journalists noted the important role of CSOs in acting upon the findings of investigative reports because the journalists' role does not include activism. CSOs and journalists noted that CSOs are often important sources of leads and data for corruption stories.

When a story is reported, CSOs also take it up and amplify it; those who can sue will sue, and those who can demonstrate will demonstrate. Compared to the situation in Nigeria 10 or 20 years ago, the synergy is getting stronger. – Qualitative interviews, 2018: Media house

On Nigeria has not started programming related to social media and no data have been collected related to their use.

¹²⁶ Nigeria: Celebrations at [grantee] as Panama Papers Win Pulitzer Prize, 2017.



Intended Media and Journalism Capacity-Building Interim Outcomes

- **Independent media outlets** have increased capacity to support data-driven investigative reporting.
- **Journalists** have increased capacity (knowledge, skills, and attitudes) to conduct data-driven investigative reporting.
- **Citizens (including youth)** have increased capacity to effectively use social media to expose corruption, amplify reporting, and demand government action or investigative journalism.

Finding: Grantees have been instrumental in building media capacity to conduct data-driven reporting on corruption and anticorruption, both for quantity and quality.

A number of media and journalism and cross-cutting grantees have invested in building capacity to improve investigative reporting.¹²⁷ Evidence from document review and qualitative interviews shows that grantees collaborated in capacity-building activities. For example, one grantee reported that two other grantees worked together in 2017 to host a 4-day training and the subsequent mentorship program.¹²⁸

Qualitative interview respondents discussed media and journalism grantees' efforts to invest in increased investigative reporting and organize training events.

We're trying to invest heavily in video recording of our reports, so that all stories reported can be backed up with evidences and this gears people up to action. For instance, when we report a case of examination malpractice, we should be able to show the pictures as proof and evoke more emotions for people to act. When people know that they can be captured in cases of corruption, they'll be careful in what they do at all times. – Qualitative interviews, Media and Journalism grantee

There are some early signs, reported in media and journalism grantee annual reports, that these capacity-building activities are starting to improve investigative journalism, and corruption and anticorruption reporting more generally. For example, since 2016, journalists have improved the quality of their interviews through quarterly training workshops,¹²⁹ and are receiving training on investigative reporting in the energy sector, digital journalism, and participating in an investigative bootcamp.¹³⁰

¹²⁷ Two grantee annual reports 2017.

¹²⁸ Grantee. *Foundation tasks media on anticorruption war*, 2017

¹²⁹ Grantee annual report, 2017.

¹³⁰ Four grantee annual reports, 2017.



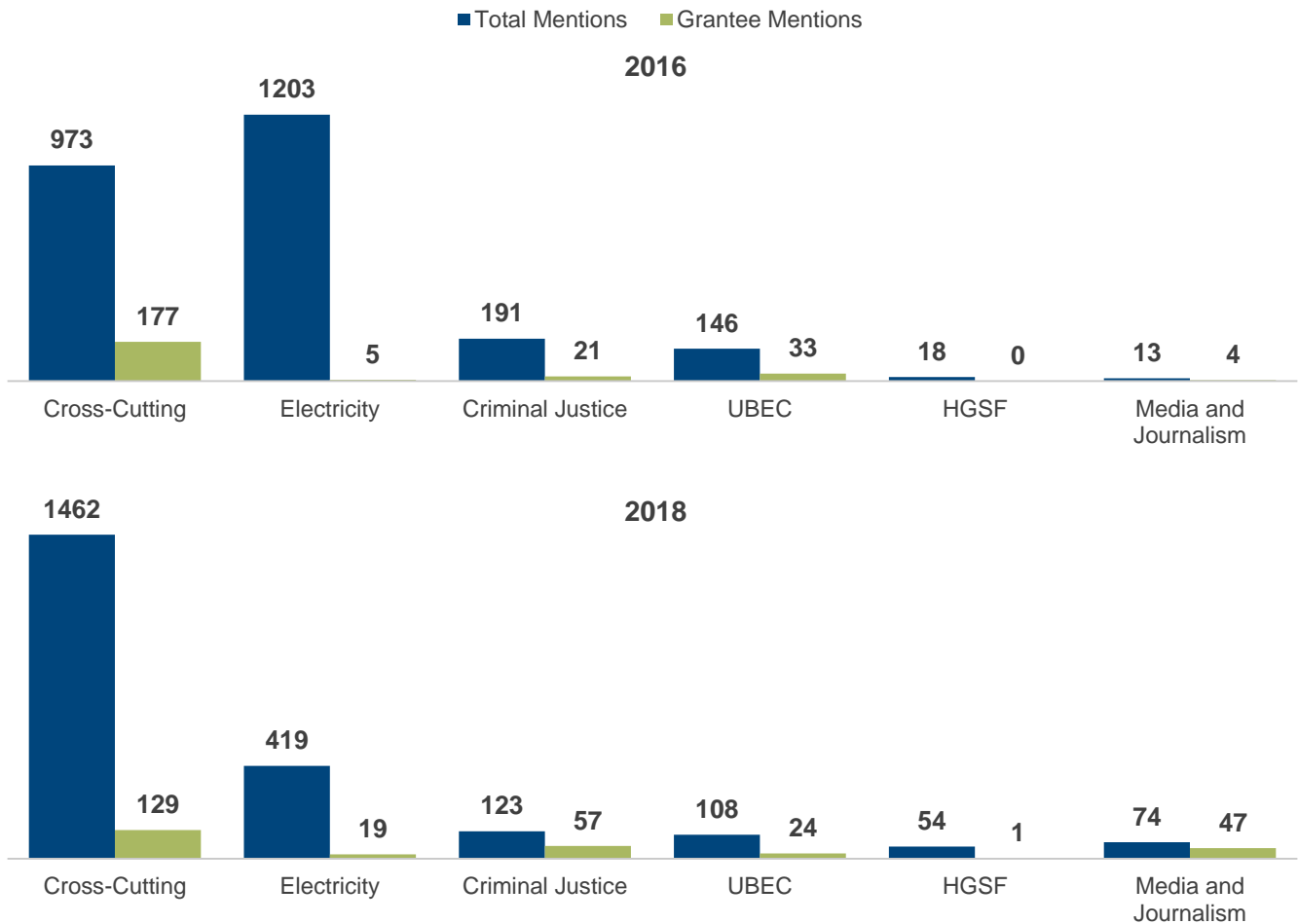
Intended Media and Journalism Collaboration Interim Outcomes

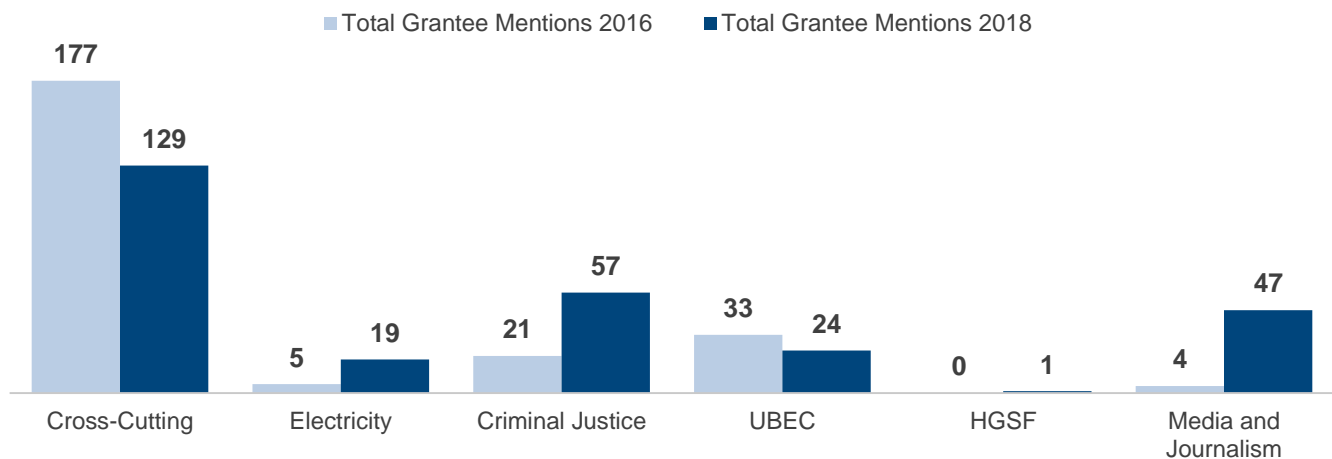
- **Cross-Cutting: Journalists, citizens, and CSOs** share information about government and business anticorruption promises, activities, and wins.

Finding: Collaboration between CSOs and media to share information and amplify each other’s “voice” efforts is present, but both groups feel there is room to strengthen it.

Media monitoring data indicate that media are reporting on CSOs’ anticorruption work through their articles and platforms by reporting on grantees’ and other CSOs’ efforts. Exhibit 50 shows that On Nigeria grantee organization mentions constitute about 10 percent of all keywords in both 2016 and 2018. In 2016, a grantee that works across modules had the highest number of mentions (175). In 2018, three grantees were mentioned 20 or more times.

Exhibit 50: Total grantee keyword mentions from 2016 and 2018





On Nigeria Media Monitoring, 2016; On Nigeria Media Monitoring, 2018

In qualitative interviews, media actors reported collaboration with other media houses and platforms, noting that sharing anticorruption stories with other outlets increased the likelihood of gaining credence.

In fact, the collaboration is more between media-to-media than with the CSOs because we exchange notes, and it is really adding value to our work to the extent that if a report is heard in a particular media and people did not hear [it] on others, they tend not to believe it until it comes from multiple sources. – Qualitative interviews, 2018: Media house

A few media actors reported, however, that they did not share stories out of concern around competition with other media houses. Additionally, qualitative interview data indicate that both CSOs’ concern about media’s biases stemming from owners’ and media’s expectations of local financial support for their reporting are limiting collaboration.

A review of grantee reports found several instances of media and CSO grantees, along with other media organizations, collaborating to improve media training and outreach, build web platforms, and stand together against political interference.¹³¹

[Grantee organization] succeeded in building a relationship between 30 journalists and a civil society organization [name], to work on social accountability issues. This has proven that information held by CSOs are [sic] enormously beneficial to journalists for investigations. The mentoring program has created an enduring, lifelong relationship created between 30 young journalists and senior media executives and newsroom managers. – Grantee annual report, 2017

During qualitative interviews, a few media organizations expressed a desire for greater and improved collaboration with CSOs. Grantees at the November 2018 Grantee Convening echoed this sentiment.

¹³¹ Three grantee annual reports, 2017.



Intended Media and Journalism Long-Term Outcomes

- **Citizens across Nigeria** have increased awareness of anticorruption wins.
- **Citizens across Nigeria** are aware of which media houses are independent, and perceive them as sources of reliable information about corruption and anticorruption actions.

Finding: While both level of access to media sources that tend to produce corruption-related reporting and awareness of anticorruption success stories vary among Nigerians, most Nigerians trust that media content related to corruption and anticorruption is reliable.

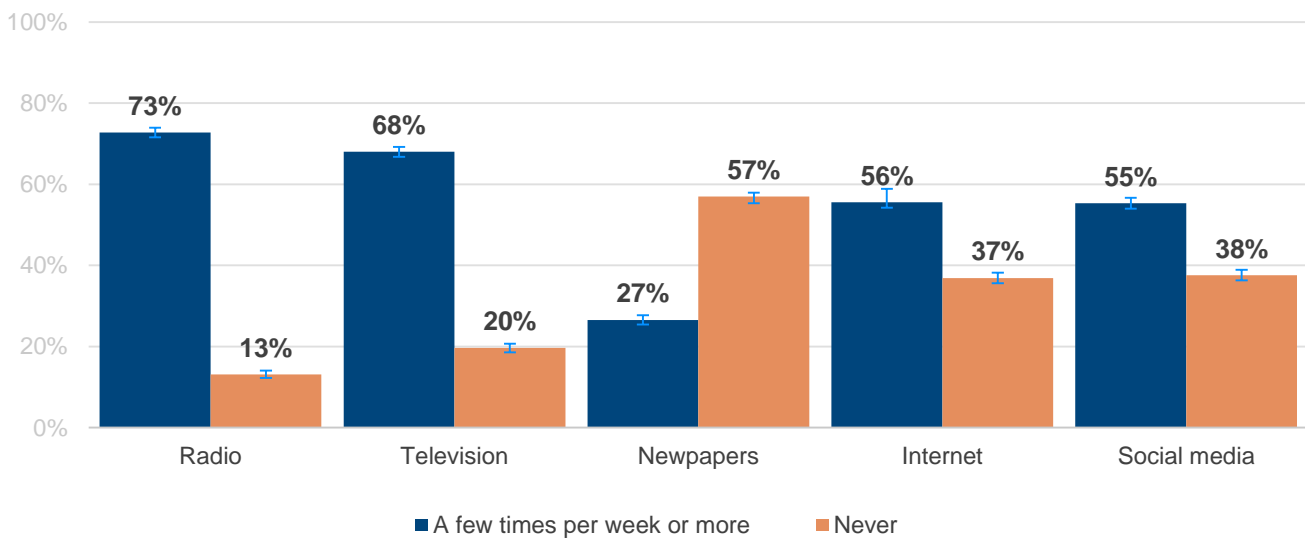
National telephone survey data indicate that public awareness of “stories on successes to combat corruption” in the media varied greatly, with 25 percent of the population stating to have “never” heard or seen such stories reported, and 10 percent saying they see anticorruption success stories every day (95% confidence intervals of 24–26% and 10–11%, respectively). There were no significant differences by respondents’ income, education, sex, or urban/rural status. When anticorruption success stories are reported, journalists in qualitative interviews said they often used a human-interest angle to provide a “hook” for these stories, believing that this approach has been the most effective for spurring public outcry and government action.

Media’s ability to increase citizens’ demand for anticorruption actions depends on citizens’ access to media sources. The 2018 national telephone survey showed that Nigerians, in order of percent using, access radio, television, Internet, social media, and newspapers (see Exhibit 51). Although media monitoring found that most corruption content is reported through online reporting and newspapers, the national telephone survey revealed that only 27 percent of the population accessed newspapers at least a few times a week (95% confidence interval: 25–28%), and a large percentage of the population never accesses newspapers, online sources, or social media.

Exhibit 51: Nigerians' use of media types

(n=8,043)

How often do you read/listen to/use each of the following media outlets?



On Nigeria telephone survey, 2018

Open and available access to media and corruption coverage is necessary for the On Nigeria media and journalism theory of change to function. In the national telephone survey, 60 to 70 percent of Nigerians reported that each of five media types (television, radio, newspapers, Internet, and social media) are “effective” or “very effective” at covering corruption.¹³² A 2017 national telephone poll by NOIPolls found that 62 percent of Nigerians believed the media to be independent. When asked in the same poll to rate levels of corruption within different media types, more respondents (45 percent) reported that radio had “low” levels of corruption than television (34 percent), newspaper (31 percent), and Internet and social media (26 percent). Perceived “high” levels of corruption across media types were higher for Internet and social media (33 percent), followed by newspaper (19 percent), television (17 percent), and radio (13 percent).¹³³

¹³² How effectively does each of the following media sources cover efforts to combat corruption? (“effective” or “very effective”): radio: 72 percent (95% confidence interval: 70–73%); television: 68 percent (95% confidence interval: 67–69%); newspapers: 60 percent (95% confidence interval: 59–62%); Internet: 67 percent (95% confidence interval: 65–68%); social media: 65 percent (95% confidence interval: 63–67%).

¹³³ NOIPolls. 2017. *The Nigerian Media; A Need to Maintain Integrity and Professionalism in the Buildup to the 2019 General Elections*.



Intended Media and Journalism Impacts

- **Independent media outlets** invest in skills building for their reporters and editors, and provide more funding for investigative reporting on corruption and anticorruption.
- **Independent media outlets** invest in and conduct high-quality investigative reporting as a standard of practice.

Finding: On Nigeria media and journalism grantees are investing in organizational capacity-building activities to strengthen, increase, and improve investigative reporting, but it is too early to tell whether media outlets are institutionalizing investments in reporting quality and capacity.

Outside of investments into investigative reporting training by media and journalism grantees, other CSOs, and foreign government agencies, little evidence emerged showing that Nigerian media outlets were investing significantly into conducting high-quality investigative reporting on corruption issues relevant to On Nigeria.

Since I joined [media source redacted], they have not organized any training of any kind for me. But as a person, I have attended over twenty capacity-building programs organized by foreign countries, organizations, partners. – Qualitative interviews, Journalist

Outside of examples related to capacity building, such as training and mentorships, it is still too early to tell whether media outlets are consistently investing in skills building for journalists and high-quality investigative reporting as a standard of practice.

4.5.5 Changing Landscape (2017–2018)

From 2016 to 2018, media monitoring data showed that proportions of corruption-related content reported in online sources increased from 22 percent in 2016 to 35 percent in 2018. Nigerians also appeared to be continuing to increase online and social media use, a continuation of the trend observed at baseline. Afrobarometer Rounds 2, 5, and 7 survey data show that the proportion of Nigerians accessing news online a few times a week or more has more than doubled from 15 percent in 2012 to 31 percent in 2015 and 35 percent in 2017.^{134, 135} Similarly, social media use is growing— according to the Pew Research Center, the percentage of Nigerian adults who use social networking sites grew from 28 percent in 2013 to 35



¹³⁴ Afrobarometer, 2012: Summary of Results: Afrobarometer Round 5 Survey in Nigeria, Q13D (n=2,400) [95% CI: +/- 2%]
 Afrobarometer, 2015: Summary of Results: Afrobarometer Round 6 Survey in Nigeria, Q12D (n=2,400) [95% CI: +/- 2%]
 Afrobarometer, 2017: Summary of Results: Afrobarometer Round 6 Survey in Nigeria, Q12D (n=2,400) [95% CI: +/- 2%]

¹³⁵ Afrobarometer, 2015: Summary of Results: Afrobarometer Round 6 Survey in Nigeria, Q12E (n=2,400) [95% CI: +/- 2%]
 Afrobarometer, 2017: Summary of Results: Afrobarometer Round 6 Survey in Nigeria, Q12E (n=2,400) [95% CI: +/- 2%]

percent in 2017.¹³⁶ Number of active (monthly) Nigerian Facebook users grew from an estimated 16 million in 2016 to 24 million in November 2018.¹³⁷ The 2018 subnational telephone survey, although not comparable to the Afrobarometer Round 8 survey data, places Internet use a few times a week or more at 56 percent and social media use at 55 percent (95% confidence intervals: 54–59% and 54%–57%, respectively). In qualitative interviews, media house and grantee CSO respondents cited social media as a popular platform for public engagement and social change around corruption issues.

People raise a lot of anticorruption stories on social media.... People are being video recorded without their knowledge. This is going a long way to check people's conduct, e.g., several cases of police collecting bribe have been reported on social media and so many of the police officers are very watchful of their conduct. – Qualitative interviews, 2018: Media house

Journalists, media house representatives, and grantees suggested in early 2018 interviews that significant obstacles inhibited more and higher quality investigative reporting.¹³⁸ Some media outlets have political or ownership conflicts of interest that hamper corruption-related reporting, and reporters who do pursue such stories have faced threats to their physical or professional security.¹³⁹ Between the beginning of 2016 and the end of May 2017 (spanning the baseline and early progress timeline), Reporters Without Borders documented more than 70 instances of “violence against journalists and media outlets,” many perpetrated by state governors.¹⁴⁰ Grantee reports showed that the lack of financial and human resources also impedes investigative reporting.¹⁴¹

You need funding for investigative journalism. If I need to go to Adamawa for instance, to go and cover how many schools UBEC were awarded contract and how many were really constructed or renovated, I will need good funding... – Qualitative interview, 2018: Journalist

I reported on anti-corruption for five years and I am still doing it now. In 2017, I wrote a story about how lawmakers make money when they go for oversight functions. I cited good examples. Less than a week after, a lawmaker brought the story to the floor of the Senate. And the Senate resolved that I should be investigated and that happened for about a week. They said they were going to declare me wanted. They summoned

¹³⁶ Pew Research Center. 2018. *Technology use in Africa: Social Networks*. Confidence intervals not available.

¹³⁷ BBC News. 2018. *Like. Share. Kill*.

¹³⁸ At the time, an assessment of the quality of 2018 investigative reporting has not yet been conducted.

¹³⁹ Grantee annual report, 2017; Premium Times. 2017. *How a Nigerian law is suppressing citizens' freedom on the Internet*; Premium Times. 2017. *Two Nigerian journalists killed, 12 assaulted in 2017*; *On Nigeria Qualitative Interviews 2018*.

¹⁴⁰ Reporters Without Borders. *Nigerian reporters under yoke of all-powerful governors*. 2017.

¹⁴¹ Grantee annual report, 2017; *On Nigeria qualitative interviews 2018*.

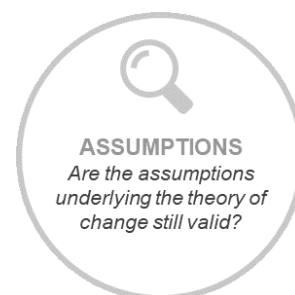
my publisher, but he didn't turn up. But eventually I was asked to intervene and advised to tone down or I will be sent to jail. – Qualitative interview, 2018: Journalist

Grantees also reported having limited access to information and that the FOIA, which is meant to make government documents more available, was insufficient.¹⁴²

Most recently, in 2018, upcoming 2019 presidential elections started to dominate media coverage. In 2018 media monitoring, 32 percent of corruption and anticorruption reporting was 2019 election-related. In the lead up to these elections, some journalists reported concern about holding politicians accountable after four bloggers were prosecuted for posting “defamatory” articles between 2015 and early 2018 under the 2015 Cybercrime Act.¹⁴³

4.5.6 Assumptions



The On Nigeria media and journalism theory of change rests on a number of assumptions about the role and capacity of media and journalists to produce quality reporting that is perceived as reliable and can make a difference in government’s response. Exhibit 52 summarizes the level of confirmation of these assumptions, based on existing evidence.



Social media, also discussed above in “voice,” are a growing outlet for information exchange. Although On Nigeria has not begun granting in this space yet, some grantees report targeting social media users through advocacy activities on platforms such as Facebook and Twitter.¹⁴⁴ The national telephone survey showed that social media use is higher among men than women ($p < 0.001$), and higher among younger populations ($p < 0.001$) and those who are more highly educated ($p < 0.001$).¹⁴⁵

Exhibit 52: Level of assumption confirmation

Confirmed: ; Mixed: ; Rejected: ; Insufficient Evidence: 

Assumption	Level of Confirmation
Journalists and civil society are not yet collaborating adequately on corruption and anticorruption issues.	
Independent media outlets have the organizational capacity (funds, business models) to support data-driven investigative reporting.	

¹⁴² Grantee annual report, 2017.

¹⁴³ Committee to Protect Journalists. 2018. *Two Nigerian journalists charged with cybercrime*.

¹⁴⁴ Grantee annual report, 2017; Two grantee annual reports, 2016.

¹⁴⁵ How often do you read/listen to/use each of the following media outlets? (Education level, Every Day): Early childhood education: 7 percent (95% confidence interval: 2–19%); Primary school: 8 percent (95% confidence interval: 6–11%); Junior secondary school: 9 percent (95% confidence interval: 6–15%); Secondary school: 28 percent (95% confidence interval: 26–30%); Graduate level: 53 percent (95% confidence interval: 51–55%); Post-graduate level: 69 percent (95% confidence interval: 63–75%); No formal education: 4 percent (95% confidence interval: 3–6%); Prefer not to say: 26 percent (95% confidence interval: 19–35%).

Assumption	Level of Confirmation
Citizens view media as a reliable source of information.	
Public action can be catalyzed by anticorruption-related reporting by journalists, and amplified by CSOs.	
Issues such as security or the economy do not eclipse public demand for anticorruption-related reporting.	
A critical mass of journalists and media outlets are not co-opted by private or government interests, or are, at least, responsive to advocacy encouraging them to forgo these conflicts of interest for the sake of high-quality reporting.	
Public interest in using social media for social change is high or can be encouraged by CSOs.	
A wide range of citizens have access to On Nigeria–supported journalism.	

4.5.7 Summary and Conclusions for the Media and Journalism Module in 2018





Nigerians are accessing news from a variety of sources, including newer outlets publishing online and posting news-related updates on social media, which can expose them to corruption-related events and reports. Across this media landscape, On Nigeria grantee activities appear to be building capacity and contributing to the volume of corruption-related reporting, despite the presence of persistent financial, political, and security challenges.

Collaboration between media and CSO grantees to conduct training, amplify anticorruption efforts, and report on corruption issues is beginning to bear fruit; however, there are opportunities to strengthen it even more, especially with CSO actors from other On Nigeria modules. Additionally, more investments are needed to improve the media’s capacity to conduct data-driven investigative reporting. Exhibit 53 summarizes progress (shown in yellow or green status for each media and journalism outcome).

On Nigeria media and journalism activities are also contributing to keeping the window of opportunity open across the strategy, especially through instances of media outlets producing and publishing stories related to corruption that have spurred positive responses and meaningful action by “teeth” actors. However, coordinated and sustained efforts to protect freedom of press and resist government’s intimidation by tracking and responding to government’s interference are still needed.

Exhibit 53 also indicates where the 2018 data were inadequate to reveal progress for some outcomes. Data quality of corruption-related investigative reporting for 2018 are not yet available, although qualitative data speak to some early progress. In the next iterations of the national telephone surveys, the evolution of citizens’ opinion on the quality of corruption-related reporting will be clearer.

Exhibit 53: Media and journalism outcomes and progress

	Substantial progress: Clear signs of movement since the beginning of On Nigeria
	Moderate progress: Some momentum visible since the beginning of On Nigeria
	No progress or regression: No indications of movement since the beginning of On Nigeria or a worsening of the situation
	Inadequate or no data available to assess progress

Interim Outcomes – Capacity Building: Do “voice” and “teeth” actors have the capacity and knowledge they need?

- 1 Independent media outlets have increased capacity to support data-driven investigative reporting.
- 2 Journalists have increased capacity (knowledge, skills, and attitudes) to conduct data-driven investigative reporting.
- 3 Citizens (including youth) have increased capacity to effectively use social media to expose corruption, amplify reporting, and demand government action or investigative journalism.

Interim Outcomes – Collaboration: Are actors collaborating to leverage success and build pressure for change?

- 4 Cross-Cutting: Journalists, citizens, and CSOs share information about government and business anticorruption promises, activities, and wins.

Interim Outcomes – “Voice:” Are “voice” actors engaging in advocacy and monitoring?

- 5 Independent media houses and more journalists conduct more and higher-quality investigative reporting driven by data to expose corruption, monitor anticorruption promises, and reveal wins (solutions).
- 6 CSOs amplify investigative reporting to expose corruption, demand government action, and show successes.
- 7 More citizens use social media to engage with (create, comment on, and share) corruption and accountability issues.

Interim Outcomes – “Teeth:” Are “teeth” actors operating transparently and holding others accountable?

- 8 Government officials and private-sector actors take action in response to media coverage related to corruption issues.

Long-Term Outcomes: Are improvements institutionalized and social norms shifted in targeted states?

- 9 Citizens across Nigeria have increased awareness of anticorruption wins.
- 10 Citizens across Nigeria are aware of which media houses are independent, and perceive them as sources of reliable information about corruption and anticorruption actions.

Impacts: Are improvements institutionalized and social norms shifted nationwide?

- 11 Independent media outlets invest in skills building for their reporters and editors, and provide more funding for investigative reporting on corruption and anticorruption.
- 12 Independent media outlets invest in and conduct high-quality investigative reporting as a standard of practice.

4.6 Strategy

4.6.1 Strategy Theory of Change

The ultimate goal of On Nigeria’s efforts is to reduce corruption by supporting Nigerian-led efforts that strengthen transparency, accountability, and participation, through the sectoral accountability portfolios in the UBEC, HGSF, and electricity modules, complemented by the systems-focused work in criminal justice reform and strengthening media and journalism. Additionally, On Nigeria includes cross-cutting actions that reinforce and transcend the individual modules to expand the number of anticorruption champions, shift social norms and behaviors, and support the government’s ability to confront corruption broadly.

Because On Nigeria has several areas of work, the strategy-level outcomes represent both a synthesis or “roll-up” of module-level efforts, additional outcomes specific to cross-cutting work, and some higher level outcomes and impacts that reflect broad change. The *Introduction* section of the report presents the strategy-level theory of change (see Exhibit 1), which confronts corruption across modules and cross-cutting areas through (1) “teeth” actions, including government actors implementing transparent practices and accountability mechanisms; and (2) “voice” actions, such as monitoring and investigating compliance, and mobilizing communities to demand services and hold corrupt actors accountable. These module roll-up and cross-cutting outcomes complement each other to, ultimately, sustain the anticorruption effort and reduce corruption across Nigeria. Annex 1 presents the complete strategy-level theory of change and measures used to assess progress.

In addition to the grants described under the specific modules, 14 cross-cutting grants were included in the 2018 data collection, representing \$6.38 million. These grantees are involved in (1) supporting state and federal agencies’, laws, policies, and systems that promote accountability and transparency; (2) promoting collaboration across and between CSOs’ and government bodies; (3) building capacities of CSOs to monitor corruption and the progress of their activities; (4) engaging new communities through behavior and social norm change, and exposure of corruption and anticorruption wins; and (5) engaging in advocacy and monitoring of candidates’ anticorruption pledges in the 2019 elections.

4.6.2 Landscape at Baseline (up to mid-2015)

The MacArthur Foundation initiated On Nigeria because several windows of opportunity existed. On Nigeria’s strategy is taking advantage of these windows of opportunity as both entry points for the work and signals that confronting corruption remains a priority in Nigeria. On Nigeria’s ongoing work focuses on expanding and institutionalizing the efforts made to enable sustainable anticorruption changes in Nigeria. The 2015 elections, Nigeria’s first democratic transition of power to an opposition party, and the Buhari administration opened an initial window of opportunity, seizing citizens’ demand for a change in the status quo. The baseline period for the overall On Nigeria strategy covers 2015 through the start of On Nigeria grants in support of national-level anticorruption efforts in mid-2015.

Data from Afrobarometer Round 5 Survey (2015) and Gallup at baseline illustrate one key initial window of opportunity—the election of a new administration in 2015 based on an anticorruption platform. Both data sources show corruption as a consistent priority for Nigerians in 2014, with respondents in the two surveys ranking corruption among the top issues. In the 2015 Gallup poll, 32 percent of respondents (95% confidence interval: 28–36%) ranked corruption as the most important issue for the government to address, only slightly behind the economy, which 36 percent of respondents (95% confidence interval: 32–40%) ranked as the most important issue. In the 2015 Afrobarometer Round 5 Survey, 23 percent of respondents ranked corruption as one of their top three priority issues (after unemployment, electricity, poverty, and crime/security).

These and similar data sources also provide a baseline of Nigerians’ perceptions on corruption and the extent of bribery. Afrobarometer Round 5 Survey and Transparency International Global Corruption Barometer 2015 data show that 43 percent of respondents (95% confidence interval not provided) who had contact with a government official paid a bribe to get the services they needed (the *bribery rate*). Many respondents (45 percent) (95% confidence interval: 43–47%) disagreed with the statement that ordinary people could make a difference in the fight against corruption, and 78 percent¹⁴⁶ reported that the government in power handled this fight poorly or very poorly.

Qualitative interviewees and document review called attention to broader contextual challenges to On Nigeria and the anticorruption agenda in general that existed in the baseline period—economic factors, including economic growth, stability of the Naira, and oil dependency.¹⁴⁷ Amid a decline in oil prices, Nigeria entered a seven-quarter recession in the third quarter of 2015—just as On Nigeria launched. This is significant because most On Nigeria programming focuses on the public sector, which is dependent on oil revenue for its budget.

4.6.3 Early Progress and Momentum (mid 2015–2018)

Initial momentum is visible in each of the programmatic areas On Nigeria focuses on, with progress toward interim “voice” and “teeth” outcomes emerging in each of the modules. As articulated in the theory of change, these interim outcomes are necessary precursors of the ultimate change the strategy intends to achieve and, thus, important early signs of progress. As expected at this stage, the initial actions are diverse, particular to each module’s systems and actors, and at different stages of implementation. Actions remain limited to the areas within On Nigeria’s immediate focus, without spread to application by actors in other sectors. The interim outcome findings below related to the four approaches (“teeth,” “voice,” capacity building, and collaboration) represent progress related to the cross-cutting areas. Roll-up measures and results from the individual modules are presented in the long-term outcomes and impacts.



Intended Strategy “Teeth” Interim Outcomes

- **Anticorruption government actors** implement the National Action Plan for Combatting Corruption.
- **Candidates running in the 2019 election** address anticorruption, transparency, and accountability in their campaign platforms.

Finding: The government is making progress in implementing the broad anticorruption agenda.

¹⁴⁶ Note: Afrobarometer provided no confidence intervals for this measure.

¹⁴⁷ Premium Times. 2017. *Despite slight improvements, Nigeria’s extractive industry still very opaque*; Quartz Africa. 2018. *Fighting Nigerian corruption might be dangerous, but preparing a Nigerian budget is hell*.

The criminal justice and media and journalism modules both play important systems-level roles, targeting key mechanisms that need to be strengthened for anticorruption efforts to succeed in the three sectoral modules and the broader anticorruption drive. As discussed above, both modules show evidence of initial progress and momentum in this systems work. More broadly, cross-cutting areas of the strategy exhibit complementary systems-level progress, with anticorruption government actors taking steps to implement the broad *National Action Plan for Combatting Corruption*. Federal government actors are prioritizing the recovery and management of proceeds of corruption as deterrence and taking away the gains of corruption, including through courts, which have ordered the recovery of looted funds.

Even as progress is being made on the implementation of the *National Action Plan for Combatting Corruption*, this momentum will need to be sustained through continued political will to weed out corruption. Successive governments’ abilities to sustain openness and transparency in its activities, as well as promote accountability and deliver good governance, will be key in maintaining progress in anticorruption activities. While several candidates announced their 2019 candidacy in the first half of 2018, there was little evidence to suggest that any (except current President Buhari) made strong commitments to anticorruption, transparency, and accountability platforms. Continued political will to address corruption is presently undetermined.



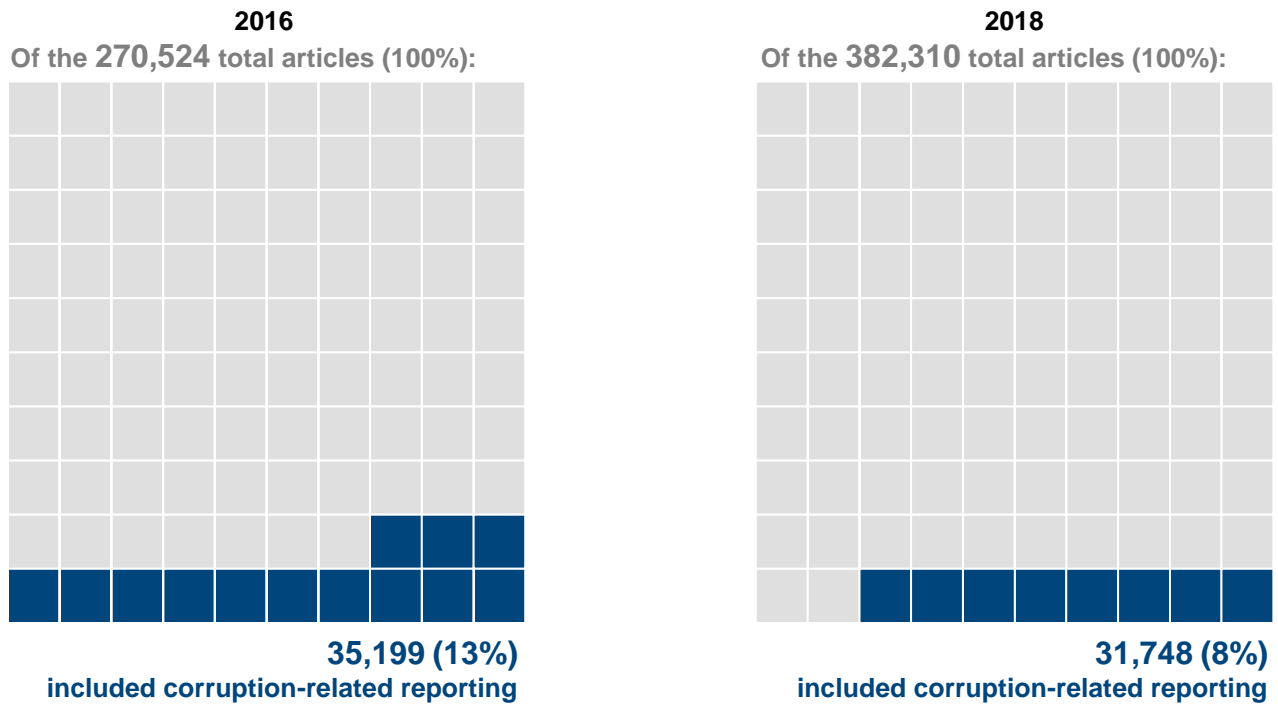
Intended Strategy “Voice” Interim Outcomes

- **CSOs and media** expose corruption and wins, and engage citizens via social and other media, including at the local level.
- **CSOs, media, women’s groups, youth, and social influencers** raise public awareness of, advocate for, monitor, and amplify candidates’ commitments to transparency, accountability, and anticorruption before and after the 2019 elections.
- **Faith-based leaders** educate and mobilize their communities to create new champions for anticorruption efforts.
- **Edutainment actors** create and disseminate educational entertainment content on corruption issues and foster dialog with audiences.

Finding: There is evidence of initial momentum in “voice” actions, particularly the media’s reporting on corruption issues, and “voice” actions within the modules.

Media monitoring data (Exhibit 54) show a significant volume of print and online reporting in 2016 (13 percent) and 2018 (8 percent) focused broadly on corruption and anticorruption issues, indicating that this is an issue that occupies a large role in traditional outlets’ reporting. For periods with media monitoring data available to date, a greater extent of reporting has focused on the presence of corruption than on anticorruption efforts or wins. The focus on corruption reporting is an indication of the media substantially engaging in an investigative and amplifying role.

Exhibit 54: Total corruption-related reporting: print and online (2016 versus 2018)¹⁴⁸



In 2016, total module or strategy-level articles with mentions made up 3.6 percent (1,266) of all corruption-related articles (0.47 percent of the total universe).

In 2018, this total was 4 percent (1,282; 0.34 percent of the total universe).

Source: *On Nigeria Media Monitoring, 2016*; *On Nigeria Media Monitoring, 2018*

Since 2017, there has also been an influx of media reports that “name and shame” looters, an action that has both “voice” and “teeth” components. The influx of media reporting was made possible after the Federal High Court in Lagos ordered the federal government to release these names due to a FOIA suit filed by an On Nigeria grantee.¹⁴⁹

Exhibit 55 below recaps nascent “teeth” and “voice” actions across the three sectoral modules (UBEC, HGSF, and electricity distribution). This shows how at the level of the modules, these actions are disrupting—or have the potential to disrupt once they are more fully implemented—the corruption specific to the three service delivery chains. These disruptors, discussed in the modules sections above, are at different stages of formation. This strategy-level view highlights both the

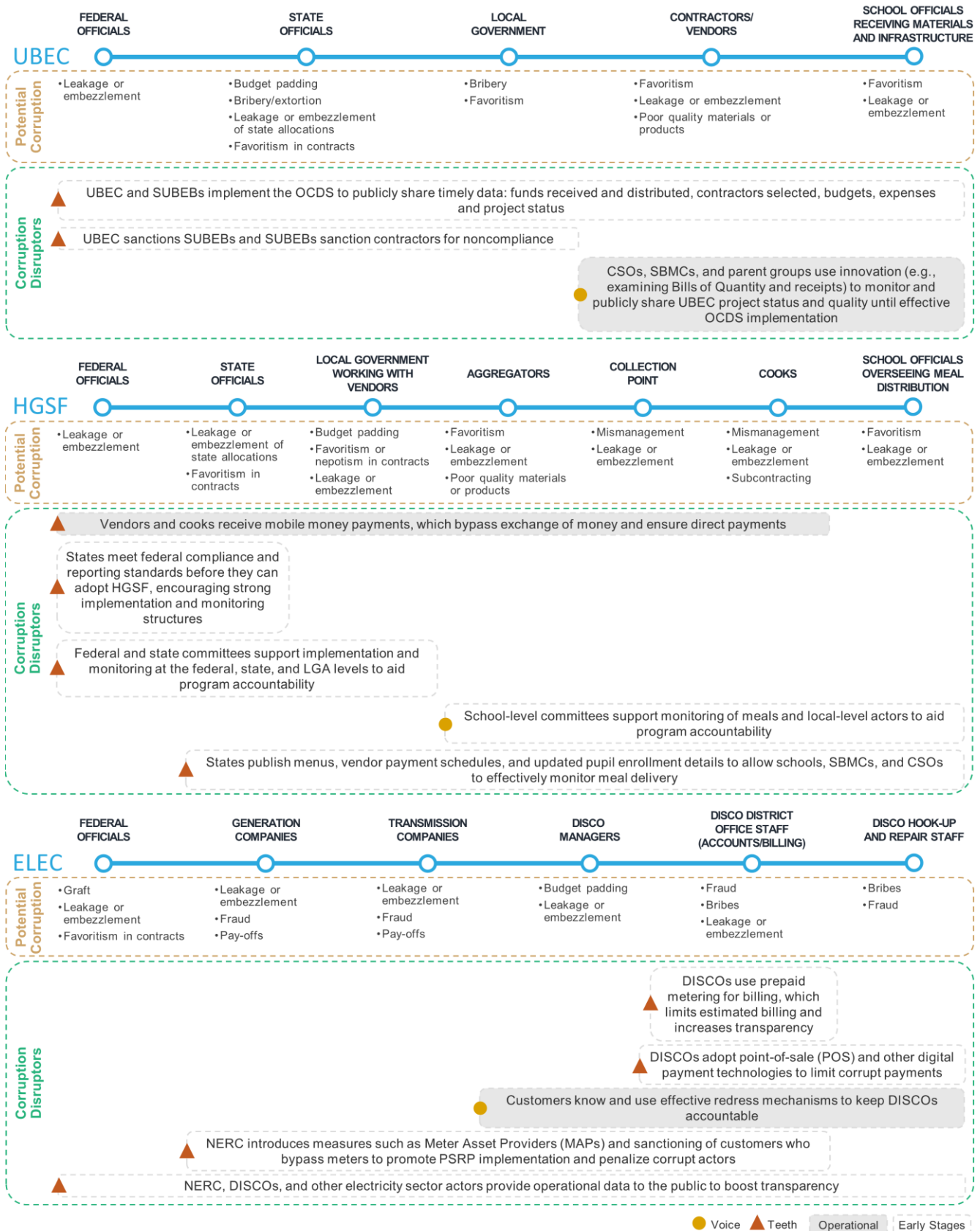
¹⁴⁸ EnCompass, with input from Playspread and the On Nigeria team, selected corruption- and anticorruption-related keywords for each module. In 2016, there were 148 keywords screened, while in 2018, there were 207, alongside 35 corruption-related filters. Additional granting necessitated the addition of cross-cutting keywords. See Annex 3 for further information about media monitoring methods.

¹⁴⁹ Malami, Abubaker (Attorney General). 2017. *Anti-Corruption: Working With The Media, Civil Society*.

distinctness of each module’s initial actions and the fact that there is progress across the modules—a key sign of initial traction and momentum. In addition to the roll-up of “voice” and “teeth” outcomes from the modules, the strategy subsumes specific cross-cutting “voice” and “teeth” actions. However, for the bulk of these cross-cutting interim outcomes, “voice” and “teeth” outcomes were not measured in 2018 due to timing of data collection.¹⁵⁰

¹⁵⁰ These outcomes have been included in the 2018 Evaluation and Learning Framework and will be included in the 2019 data collection.

Exhibit 55: Recap of On Nigeria corruption disruptors





Intended Strategy Capacity-Building Interim Outcomes

- **CSOs** can communicate and monitor the progress of their work on issues of accountability, transparency, and governance.

Finding: CSOs are building capacity to be able to hold government accountable.

To be able to hold government accountable, citizens, mass media, and civil society must have access to information critical to the process. That is, anticorruption actors need to be aware of current policies, the various institutional mechanisms for the process of accountability, and how to use the extant redress mechanisms to address grievances and concerns. In addition to capacity building described in the individual modules, media grantees have reported training journalists in cross-cutting areas, including the Whistleblower policy and use of new online platform, Budeshi, to monitor public spending related to UBEC. In qualitative interview and focus groups, CSOs and international organizations highlighted capacity building for budget tracking, submitting information requests to the government, and related activities. These actions show that grantees and the MacArthur Foundation are playing a large role in the training of CSOs, media, and other anticorruption actors on information critical to the ability to hold state actors accountable. Qualitative data show that CSOs and international organizations feel public capacity to monitor and demand services has increased as a result of these capacity-building efforts over the past year. Government stakeholders expressed positive feelings about anticorruption capacity-building efforts within the public sector, but all other stakeholder groups were more likely to cite lack of public sector’s capacity as a barrier to anticorruption work.



Intended Strategy Collaboration Interim Outcomes

- **Anticorruption actors** collaborate on issues of accountability, transparency, and governance.

Finding: Grantees, CSOs, and government actors are collaborating to build coalitions to amplify anticorruption efforts.

Grantee data and news articles document examples of grantees collaborating with each other and other CSOs to implement training events and town halls, conduct information sharing sessions, and promote youth involvement in anticorruption issues. In qualitative interviews and focus groups,

respondents across modules and categories noted that CSOs and media organizations were building this momentum for anticorruption work through collaboration. There is evidence of government–civil society collaboration, with examples of government having encouraged civil society “voice” by working with CSOs, including grantees.¹⁵¹

The government’s collaborative efforts have included consultations to several institutions, such as the Nigerian Bar Association through the Presidential Advisory Committee Against Corruption (PACAC), joint work with international institutions like the World Bank, and foreign governments through the Open Government Partnership. While these instances of collaboration are promising and on the right track, collaborative efforts are still discrete activities, and do not yet reflect system-wide changes needed to legitimize and sustain efforts of actors working within the collaborative partnerships. Yet, in qualitative interviews and focus groups, CSOs have highlighted the Open Government Partnership and Open Budget Initiative as improvements in formal collaboration mechanisms.



Intended Strategy Long-Term Outcomes

- **Governments and private-sector actors** implement transparency and accountability practices as standard procedure to ensure the flow of goods and services.
- **Citizens in targeted states** receive UBEC and HGSF goods and services, and transparently priced electricity.
- **Governments and monitoring committees** adopt state-level versions of the ACJA and monitor ACJA.
- **Anticorruption government actors** implement and enforce policies and laws to address corruption (e.g., name looters, recover assets, protect whistleblowers, and conduct legislative oversight of corruption).
- **Candidates elected in the 2019 election** enact commitments to anticorruption, transparency, and accountability.
- **Citizens** have greater awareness of anticorruption issues and wins from media and other sources they consider reliable.
- **Citizens in targeted areas** demand services they should be receiving and have decreased tolerance for corruption.

Finding: The Government of Nigeria is making progress on its anticorruption agenda, with passage and implementation of policies and laws, although substantial work remains to be done.

Over the past few years, the federal government has steadily enacted laws and policies that promote anticorruption efforts, and begun to implement key statutes that were already on the books but previously went unenforced, as seen in Exhibit 56. In 2015, the administration renewed commitment to the Economic and Financial Crimes Commission (EFCC) (Asset Recovery) Act of 2004 to hold public fund looters accountable in Nigeria. In addition, the administration established the PACAC to promote the anticorruption reform agenda and advise on implementing reforms in the criminal justice system. The Government of Nigeria has also been collaborating internationally to advance anticorruption efforts, including joining the Open Government Partnership in 2016 and unveiling its

¹⁵¹ Grantee annual reports; Premium Times. 2018. *Nigeria: EFCC Records Over 647 Convictions From Nov 2015 Till Date; This Day, 2017. Building Cooperation, Partnerships on Asset Recovery.*

associated *National Action Plan* in 2017, as well as pursuing asset recovery mechanisms with at least six foreign governments.¹⁵² Three state governments have also indicated interest to participate: Anambra, Kaduna, and Kano. On Nigeria has contributed to this work through its support for the PACAC, which has helped anticorruption agencies devise clearer strategies for obtaining forfeiture of assets suspected to have been acquired fraudulently, before prosecuting suspected culprits. This work has involved the review of existing laws, including the Money Laundering Act of 2004, the Economic and Financial Crimes Commission Act of 2004, and the Independent Corrupt Practices and other Related Offences Act of 2000 to identify sections directly conferring powers of forfeiture on Nigeria’s anticorruption agencies.¹⁵³

Exhibit 56: Federal laws and policies that promote anticorruption efforts¹⁵⁴

		May Executive Bill for the Mutual Legal Assistance in Criminal Matters passed into law	March All states must adhere to the Freedom of Information Act (passed in 2011) affirmed by Court of Appeal
(n/a) Independent Corrupt Practices and other Related Offences Act (passed 2000), Money Laundering Act (passed 2004), and Economic Financial Crimes Commission (Asset Recovery) Act (passed 2004): Buhari renews commitment and accelerates implementation	(n/a) Treasury Single Account implemented (est. in 2012)	June Witness Protection Bill passed into law	March Federal Audit Service Commission Bill passed into law
	July Nigeria joins Open Government Partnership	July Whistleblower Protection Bill passed into law	July Nigerian Financial Intelligence Unit Bill passed into law
Aug Presidential Advisory Committee Against Corruption (PACAC) established	Nov Presidential Committee on Asset Recovery established	July Federal Executive Council approves National Anti-Corruption Strategy: 2017–2021 (Policy)	July Preservation of Suspicious Assets Connected with Corruption (Executive Order No. 6) signed; and Proceeds of Crime Bill passes house
		Sep Corruption and Financial Crimes Cases Trial Monitoring Committee established	Sep Attorney General inaugurates 17-member National Anti-Corruption Strategy Monitoring and Evaluation Committee
2015	2016	2017	2018
Criminal Justice Elements			

¹⁵² Government of Nigeria. 2018. *Buhari Administration 3rd Year Report/Factsheet*; Open Government Partnership. 2017. *OGB Nigeria National Action Plan (2017–2019)*; Parliament of the United Kingdom. 2016. *DFID’s Programme in Nigeria*.

¹⁵³ Premium Times. 2018. *What Buhari has done to tackle corruption, insecurity in three years – Presidency*.

¹⁵⁴ Presidential Advisory Committee Against Corruption. 2018. PACAC Government Website (www.pacac.gov.ng); Premium Times. 2017. *Nigeria has saved N24.7 billion from TSA, IPPIS/BVN monthly – Buhari*; Open Government Partnership. 2017. *OGB Nigeria National Action Plan (2017–2019)*; Guardian. 2017. *All eyes on NJC’s corruption cases monitoring group*; Vanguard. 2018. *Special Anti-Corruption Courts deliver Judgments in 324 cases in 6 Months-NJC*;

The specific laws and policies noted in this timeline surfaced through the document review, and are also seen in qualitative data and media monitoring. Media monitoring, for example, revealed 798 mentions of the EFCC in corruption- and anticorruption-related reporting. Respondents noted this progress in qualitative interviews and focus groups, singling out the federal government's active role in improving the policy framework.

We have a lot of anticorruption laws in place. The federal government has done well... as far [as] law-making is concerned, the legislature is ahead of every one of us. – Qualitative interview, 2018: Grantee CSO

Some tangible results from many of these policy and legal improvements have already begun to emerge. As of July 2018, just 6 months after initiation, the special anticorruption courts had already delivered judgement in 324 cases.¹⁵⁵ According to EFCC figures, the federal government has recovered stolen assets from numerous looters since 2015; totals of the sum recovered vary, but range from \$1.4 to \$2.9 billion (505 billion to 1.05 trillion Naira) in the period up to May 2018.¹⁵⁶ In December 2017 alone, the government recovered \$322 million (116 billion Naira) from Switzerland from the late General Sani Abacha, Nigeria's ruler from 1993 to 1998; while substantial, this sum represents only a fraction of the \$3 to \$5 billion (1.08 to 1.8 trillion Naira) Abacha is estimated to have looted.¹⁵⁷

Although these early signs of progress are encouraging, several sources from the document review indicated there was still much that could be done. The lack of budget and procurement transparency stands out as one area in need of improvement because it is seen as a key enabler of corruption. While the government and grantees have introduced the new Budeshi platform as a monitoring

Voice of Nigeria. 2018. *Senate passes Bill to establish Federal Audit Service*; This Day. 2018. *Buhari Signs Nigerian Financial Intelligence Unit Bill*; Government of Nigeria. 2018. *Presidential Executive Order No. 6 of 2018 on the Preservation of Suspicious Assets Connected with Corruption and other Relevant Offences*; Vanguard. 2015. *What Buhari promised Nigerians*.

¹⁵⁵ Remarks by the Chairman of the Corruption and Financial Cases Trial Monitoring Committee on November 15, 2018, at a workshop in Abuja put the number slightly higher, at 354. (see <https://www.premiumtimesng.com/news/top-news/274527-special-anti-corruption-courts-deliver-judgement-in-324-cases.html>)

¹⁵⁶ The Nation. 2018. *EFCC has recovered over N500 billion, says Magu*. <http://thenationonlineng.net/efcc-has-recovered-over-n500-billion-says-magu/>; Vanguard. 2017. *EFCC recovers \$2.9b looted cash in 2 years*. <https://www.vanguardngr.com/2017/11/efcc-recovers-2-9b-looted-cash-2-years/>

¹⁵⁷ The Guardian. 2018. *FG receives \$322.51 million Abacha's loot from Switzerland*; FBI. 2014. *U.S. Forfeits More Than \$480 Million Stolen by Former Nigerian Dictator in Largest Forfeiture Ever Obtained Through a Kleptocracy*. <https://www.fbi.gov/contact-us/field-offices/washingtondc/news/press-releases/u.s.-forfeits-more-than-480-million-stolen-by-former-nigerian-dictator-in-largest-forfeiture-ever-obtained-through-a-kleptocracy-action>; Transparency International. 2018. *Returning Nigerians' Stolen Millions*. https://www.transparency.org/news/feature/returning_nigerians_stolen_millions

system to help address this in recent years, the platform serves to aggregate already publicly available information, and it remains too early to assess the platform's impact.¹⁵⁸

At the same time, CSOs, including one On Nigeria grantee, have called attention to the importance of ensuring recovered assets are not re-looted, pointing out that accounting for previous Abacha assets recovered has been murky.¹⁵⁹ In a sign of potential progress, the government announced a plan for the \$322 million (116 billion Naira) recovered in December 2017 to be distributed to Nigeria's most vulnerable through the Conditional Cash Transfer Program and included monitoring by civil society; however, these conditions were imposed by Switzerland due to previous experiences.¹⁶⁰

Grantee feedback during the November 2018 convening indicated that legal challenges to some of these achievements could also pose a threat to their sustainability. In particular, an additional 2018 Court of Appeals ruling contradicted the March 2018 Court of Appeals decision noted in Exhibit 56 above on the applicability of the FOIA to states; both cases are now pending before the Supreme Court. At the same convening, grantees noted ongoing, unresolved questions regarding legality of the special anticorruption courts because while the executive branch has the authority to designate cases to existing courts, the power to create courts (as done in this case) is reserved to the National Assembly.

Additionally, CSOs, international organizations, and government agencies all point to an increase in citizens' awareness of their rights and engagement in government monitoring. Qualitative interviews and focus groups data suggest that this, in turn, has resulted in greater government responsiveness. However, while progress is beginning to materialize, there is still more work to be done, with evidence emerging from document review that many ordinary citizens still lack the knowledge and capacity to hold corrupt actors and institutions accountable.

¹⁵⁸ The Guardian. 2017. "A lot of people have a lot to lose;" Nigeria launches website to combat corruption; International Budget Survey. 2017. *Nigeria Country Summary*; Civil Resource Development and Documentation Centre. 2015. *Nigerian States Budget Transparency Survey*.

¹⁵⁹ Transparency International. 2018. *Returning Nigerians' Stolen Millions*.
https://www.transparency.org/news/feature/returning_nigerians_stolen_millions

¹⁶⁰ Punch. 2018. *UK, group to monitor \$322m Abacha loot spending*. <https://punchng.com/uk-group-to-monitor-322m-abacha-loot-spending/>



Intended Strategy Impacts

- **State and federal judiciaries and prosecutors** conduct more trials, including corruption cases, according to ACJA standards.
- **Citizens across Nigeria** have decreased tolerance for corruption and demand services they should receive.
- **Federal government, additional states, and additional private-sector actors** adopt and institutionalize systems for transparency, accountability, and corruption reduction.
- **Federal government and additional states** conduct corruption trials in accordance with ACJA standards.
- **Citizens across Nigeria** receive improved goods and services previously hindered by corruption
- **Citizens across Nigeria** demand that elected officials, government actors, and private companies implement transparency and accountability practices as standard procedure to ensure the flow of goods and services.
- **Citizens across Nigeria** engage in anticorruption efforts and refrain from participating in corruption.
- **Federal government, states, and judiciaries** prosecute, recover stolen assets, implement anti-theft systems, and transparently redeploy assets for social good.
- **Citizens across Nigeria** have increased trust in the government's ability to combat corruption.

Finding: It is too early to talk about changes in the level of corruption or On Nigeria's contribution to impact on corruption and anticorruption at a national level; however, survey data indicate that corruption remains an important priority for citizens in Nigeria.

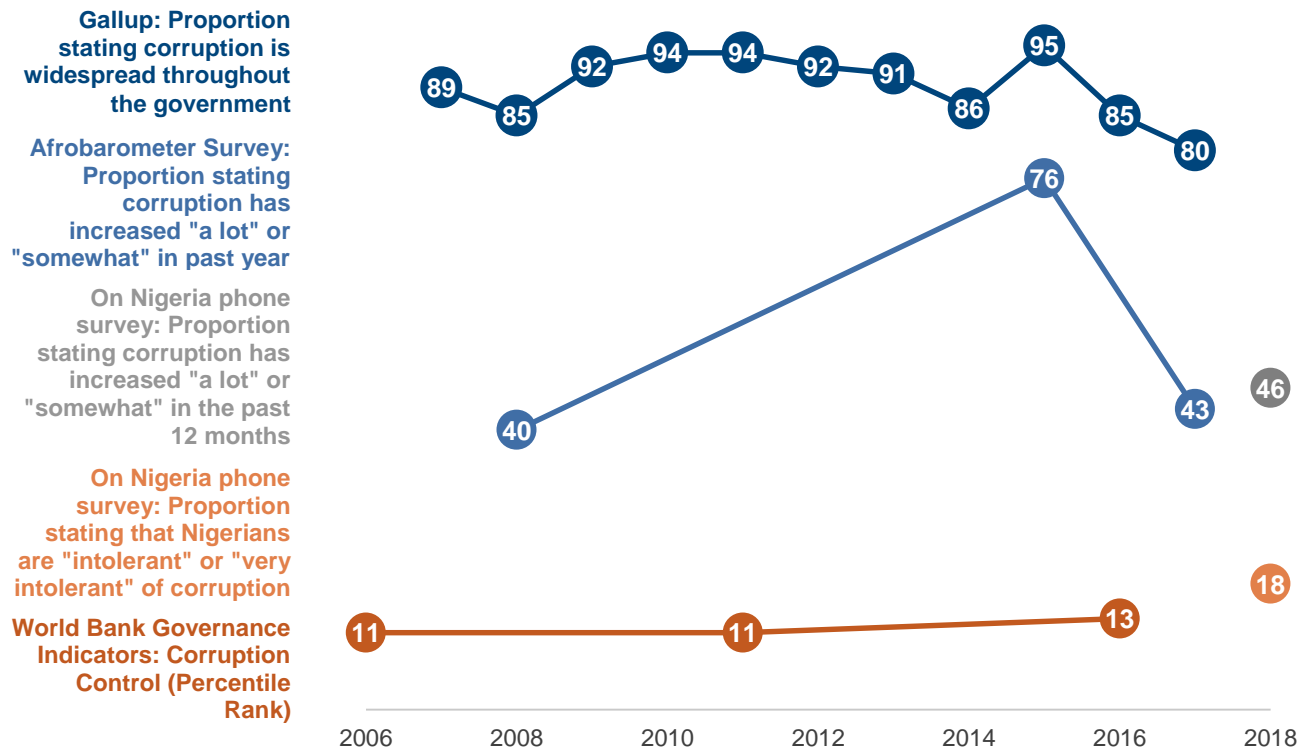
Exhibit 57 presents three major indices of corruption, which are available through 2017, as well as data from the 2018 national telephone survey. These indices should be interpreted as demonstrating long-term trends rather than changes in corruption from one year to the next.¹⁶¹

Gallup and Afrobarometer Round 7 Survey data indicate that in 2017, corruption's listing as the highest priority has remained stable. Additionally, more than four out of five Nigerians continue to see corruption as widespread, and almost half of Nigerians still feel corruption is increasing. The World Bank Control of Corruption indicator shows relative stability in Nigeria's standing since 2006. As public opinion measures (perceptions), Afrobarometer Survey and Gallup show more movement year on year, although over the past decade, they also reflect a trend of relative stability. Gallup data showed a spike in perceptions of the amount of corruption in 2015; this has since decreased 15 percent. However, overall, before 2017, the measure had not moved outside of a 10-point range since Gallup began tracking this statistic in 2007,¹⁶² and it is too early to determine whether 2017 is an outlier or the beginning of a new trend. Afrobarometer Round 5 Survey showed a similar spike in 2015, but the most recent round in 2017 returned to within the confidence interval of the historical norm shown in earlier rounds of data collection.

¹⁶¹ Measuring corruption presents many challenges and these data should be read with caution; see limitations section above and Annex 3 for additional detail regarding limitations of these measures.

¹⁶² The data points have a maximum confidence interval of +/- 4 percentage point at the 95-percent confidence level, further indicating that the movement year on year over the previous 10 years was marginal.

Exhibit 57: Extent of corruption in Nigeria as measured by corruption indices



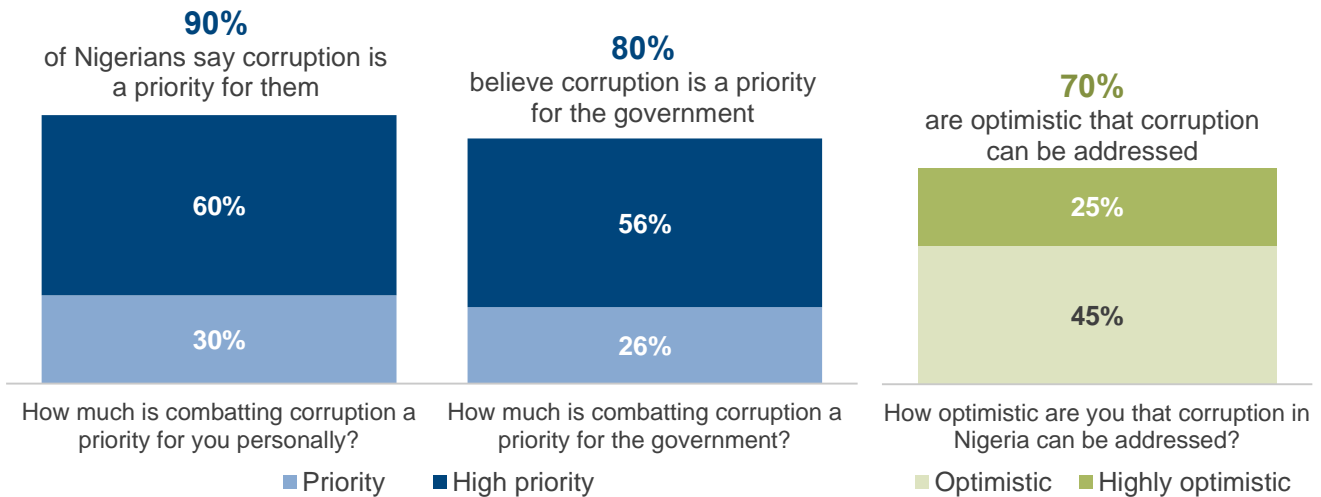
On Nigeria national telephones survey 2018; World Bank, Worldwide Governance Indicators; Afrobarometer Survey, Nigeria; Gallup Poll, Nigerians' Attention Turns toward Economy

The On Nigeria telephone survey data align very closely with Afrobarometer Survey Round 7 data, and provide an important caveat: While 45 percent felt corruption had increased in the past year and 38 percent felt it had decreased, this perception was significantly correlated with overall approval/disapproval of the current government ($p < 0.001$).

Exhibit 58 presents data from the national telephone survey indicating that nearly all Nigerians rank combatting corruption as a priority, with an outright majority stating it is a "high priority" for themselves personally and the government. Seventy (70) percent expressed optimism that corruption can be addressed; however, this sentiment is also correlated with approval for the current government, and it is not possible to know whether one element is driving the other. Although there are some variations across demographic groups based on language, sex, and socioeconomic status, the majority holds across all questions for all demographic groups, collectively indicating that corruption is a priority issue across the society.

Exhibit 58: Citizens' perceptions of window of opportunity for combatting corruption

(n=8,035)

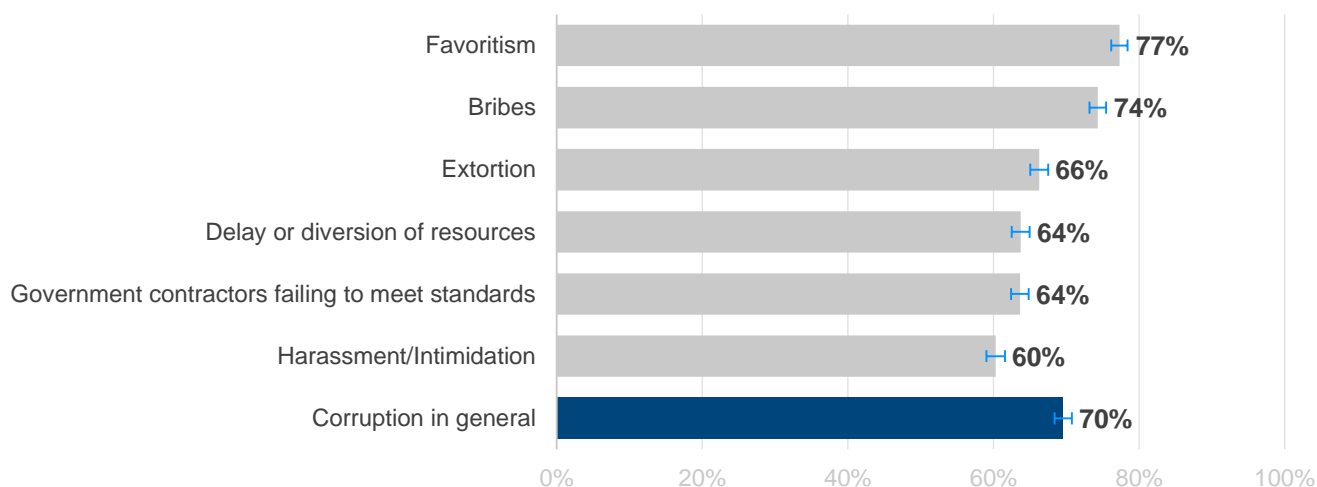


On Nigeria national telephone survey, 2018

Both On Nigeria’s telephone survey and Afrobarometer Round 8 Survey show that those who said corruption had increased were more likely to say it had increased “a lot” rather than “somewhat,” whereas those who said corruption had decreased were less likely to say it decreased by “a lot,” instead giving a more measured response that it had decreased “somewhat.” At the same time, Afrobarometer Round 7 Survey did show improvement from 2015 to 2017 at both ends of the spectrum: In 2017, fewer of those who felt corruption had increased indicated it had done so by “a lot” (50 percent in 2015 compared to 25 percent in 2017), and more of those who felt it had decreased stated it had done so by “a lot” rather than “somewhat” (just 1 percent in 2015 compared to 10 percent in 2017).

Data on perceptions of social norms from the 2018 national telephone survey show that a large majority of Nigerians perceive their fellow citizens to be tolerant of corruption, both in general and for various specific types (see Exhibit 59). While differences across the types of corruption are statistically significant, they are not large, with majority tolerating all types of corruption and a range of just 15 percentage points between the minimum and maximum. The 2017 Afrobarometer Round 7 Survey data indicate that 54 percent of respondents feel that ordinary people can make a difference in the fight against corruption, compared to 39 percent in 2013 (confidence interval: -/+ 2%).

Exhibit 59: Nigerians’ perceptions of fellow citizens’ tolerance for different types of corruption



4.6.4 Changing Landscape (2017–2018)

Tackling endemic corruption requires going beyond law enforcement to bring to bear a range of anticorruption tools and actors. Several windows of opportunity have opened up in Nigeria in the past few years, reflecting national political will to tackle corruption. In the 2017 Afrobarometer Round 7 Survey, even though 91 percent of the respondents saw corruption as a major issue, 58 percent believed that the president's anticorruption war was working. The Afrobarometer Round 7 Survey also found that the presidency was ranked as the least corrupt public institution. At the same time, critics have said that Buhari is only targeting political rivals and making exceptions for members within his own party.



International institutions and governments, such as the UK Department for International Development (DFID), the U.S. State Department, the G20, the Open Government Partnership, and the African Union, are focusing on anticorruption activities in Nigeria. Specifically, DFID is investing in enabling citizens to hold the executive branch to account, increasing transparency in the oil sector, and tackling corruption within the business/private sector. They also planned to support credibility of the 2019 election process through training for the officials of the Independent National Electoral Commissions. The Global Forum on Asset Recovery is providing support for asset return in Nigeria, among other countries. The U.S. State Department helped to fund an On Nigeria grantee’s website *Report Yourself* to allow ordinary people to report bribes they paid.

At the citizen level, Exhibit 58 above shows that 69 percent of national telephone survey respondents reported being optimistic or highly optimistic that corruption in Nigeria could be addressed, and 90 percent reported that combatting corruption was a priority or high priority for them.

However, ongoing challenges in the Nigerian context continue to pose threats to its anticorruption efforts, including: economic stability and the stability of the Naira, Nigeria’s oil dependency, and security threats in the form of ethnic or Boko Haram violence. Amid a global decline in oil prices, Nigeria experienced a seven-quarter recession from 2015 to 2017, a problem compounded by a

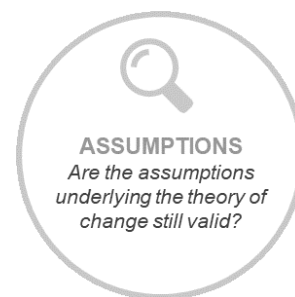
series of vandalism attacks that affected the oil production. Although Nigeria has experienced moderate growth since emerging from recession (less than 2 percent), it has yet to return to pre-recession levels.¹⁶³ Combined with a burgeoning demographic boom (the majority of the country is aged 19 or under) and persistently high youth unemployment, it is not surprising that Gallup's 2017 poll found the economy as the top priority for the majority of Nigerians (59 percent).¹⁶⁴

Security issues pose additional threats to anticorruption work. The Afrobarometer Round 7 Survey points to security in general and Boko Haram in particular as Nigerians' top priority in 2017—a sentiment echoed in qualitative interviews among CSOs and media organizations, especially those operating in the Northeast and delta regions. According to Transparency International, corruption within the military severely affects Nigeria's fight against Boko Haram in the North East. More recently, media have raised the prospect of farmer–herder unrest spreading to other regions.¹⁶⁵

In addition to these general contextual issues, qualitative data from CSOs and international organizations pointed specifically to weak government systems and public sector's capacity, especially low wages, as a challenge to the government's ability to sustain and implement the anticorruption agenda in particular. Media, CSOs, international donors, and government actors all reported that the low compensation of police, teachers, and low-level bureaucrats creates an incentive structure that promotes corruption and poor performance, and the pressure to maximize supplementary income opportunities affects the upper ranks of the Nigerian government. Overall, qualitative interview respondents across modules and respondent categories stated that corruption is the most entrenched in procurement systems, and within the electricity sector, it is the most engrained in estimated billing.

4.6.5 Assumptions

The On Nigeria strategy-level theory of change rests on assumptions of economic and political stability in Nigeria and continued political will to sustain anticorruption efforts. Findings at the strategy level indicate that while there is overall promising momentum in the direction of combatting corruption in Nigeria at the end of the incipient stage of the strategy, sustained efforts during the full period of On Nigeria are critical to obtaining strategic, long-term outcomes and impacts in the fight against corruption in Nigeria.






¹⁶³ National Bureau of Statistics. 2018. *Nigerian Gross Domestic Product Report (Q3 2018)*. <https://nigerianstat.gov.ng/>; IMF. 2018. *Nigeria: Out of Recession and Looking Beyond Oil*. <https://www.imf.org/en/News/Articles/2018/03/15/na031518-nigeria-out-of-recession-and-looking-beyond-oil>

¹⁶⁴ Gallup. 2017. *Nigerians' Attention Turns toward Economy*. <https://news.gallup.com/poll/223265/nigerians-attention-turns-toward-economy.aspx>

¹⁶⁵ BBC News. 2018. *Nigeria's Plateau state clashes leave 86 dead*.

Exhibit 60: Level of assumption confirmation

Confirmed: ; Mixed: ; Rejected: ; Insufficient Evidence: 

Assumption	Level of Confirmation
1. Structural barriers that impede quality services and products (independent of corruption) to education and electricity programming can be overcome.	
A. Government officials are internalizing norms of transparency and accountability, and demonstrating decreased tolerance for corruption.	
B. The federal and state governments will adopt policies and laws that address corruption (e.g., asset recovery, ACJA, and whistleblower protection laws).	

4.6.6 Summary and Conclusions of Strategy in 2018

Overall, at On Nigeria’s strategy level, there is evidence of emerging momentum at the interim outcome level, with several “voice” and “teeth” actions underway to confront corruption across the sectoral modules (UBEC, HGSE, and electricity) and the systems-level modules (criminal justice and media and journalism). At the national level, the government’s anticorruption agenda, which relates to several cross-cutting On Nigeria outcomes, is also showing progress. Anticorruption actions are being implemented (although not consistently applied) as are initiatives (e.g., Open Government Partnership and Open Budget Initiative). Although it is too early to speak of impact and On Nigeria’s contribution to reducing corruption, the emerging changes and momentum are those the theory of change hypothesizes are necessary precursors to achieving long-term outcomes and On Nigeria’s ultimate goal. At the same time, there is still substantial work to be done, particularly to increase transparency in public sector procurement systems (in education and other areas), continue recovering assets, further improve the legal framework, and above all, continue confronting corruption to make a more sizeable dent in its volume and foment the changes in social norms that are necessary to break its vicious cycle. Exhibit 61 summarizes progress (shown in yellow or green status for each strategy outcome).

Contextual factors provide both enablers and constraints to On Nigeria’s further progress: The continued existence of windows of opportunity provides viable entry points, partners, and enthusiasm for confronting corruption, while economic headwinds, security concerns, and weak public sector capacity and remuneration could eclipse corruption as a priority or stall reforms. Moreover, while there is traction on several outcomes of On Nigeria, more time will be required for anticorruption gains to extend beyond the targeted states and sectors of UBEC, HGSE, and electricity to Nigerian public life in terms of both behavior and norm changes.

Measures for interim outcomes all show clear momentum at this stage, but this is not a guarantee of continued progress. Measures pertaining to long-term outcomes are showing emerging progress with some signs of success, particularly in the implementation of policies and laws, and recovery of stolen assets. It is too early to assess progress toward impacts because change would not yet be expected at this early stage, and many of the impact measures are only available with a 1-year lag or come from the national telephone survey, for which only 1 year of data are available. However, as

Nigeria neared the end of the administration’s first term, there was evidence that corruption remains a priority for Nigerians.

Exhibit 61: Strategy-level outcomes and progress

- Substantial progress: Clear signs of movement since the beginning of On Nigeria
- Moderate progress: Some momentum visible since the beginning of On Nigeria
- No progress or regression: No indications of movement since the beginning of On Nigeria or a worsening of the situation
- Inadequate or no data available to assess progress

Interim Outcomes – Capacity Building: Do “voice” and “teeth” actors have the capacity and knowledge they need?

A CSOs can communicate and monitor progress of their work on issues of accountability, transparency, and governance.

Interim Outcomes – Collaboration: Are actors collaborating to leverage success and build pressure for change?

B Anticorruption actors collaborate on issues of accountability, transparency, and governance.

Interim Outcomes – “Voice:” Are “voice” actors engaging in advocacy and monitoring?

- C** CSOs and media expose corruption and wins, and engage citizens via social and other media, including at the local level.
- D** CSOs, media, women’s groups, youth, and social influencers raise issues, advocate, monitor, and amplify candidates’ commitments to transparency, accountability, and anticorruption before and after the 2019 elections.
- E** Faith-based leaders educate and mobilize their communities to create new champions for anticorruption efforts.
- F** Edutainment actors create and disseminate educational entertainment content on corruption issues and foster dialog with audiences.

Interim Outcomes – “Teeth:” Are “teeth” actors operating transparently and holding others accountable?

- G** Anticorruption government actors implement the National Action Plan for Combatting Corruption.
- H** Candidates running in the 2019 election develop consensus on anticorruption, transparency, and accountability platforms.

Long-Term Outcomes: Are improvements institutionalized and social norms shifted in targeted states?

- I** Anticorruption government actors implement and enforce policies and laws to address corruption (e.g., name looters, recover assets, protect whistleblowers, and conduct legislative oversight on corruption).
- J** Candidates elected in the 2019 election enact commitments to anticorruption, transparency, and accountability.
- K** Citizens have greater awareness of anticorruption issues and wins from media and other sources they consider reliable.
- OO** Citizens in targeted areas demand services they should be receiving and have decreased tolerance for corruption.

Impacts: Are improvements institutionalized and social norms shifted nationwide?

- L** Citizens across Nigeria demand that elected officials, government actors, and private companies implement transparency and accountability practices as standard procedure to ensure the flow of goods and services.
- M** Citizens across Nigeria engage in anticorruption efforts and refrain from participating in corruption.
- N** Federal government, states, and judiciaries prosecute, recover stolen assets, implement anti-theft systems, and transparently redeploy assets for social good.
- O** Citizens across Nigeria have decreased tolerance for corruption and demand services they should receive.
- O** Citizens across Nigeria have increased trust in the government’s ability to combat corruption.
- P** Corruption across Nigeria is reduced.

4.6.7 Feedback

The Evaluation and Learning Framework’s feedback evaluation questions elicit deeper understanding of stakeholders’ perspectives regarding On Nigeria’s strategy and work, and help validate evaluation data and findings. Findings presented here are based on qualitative data, grantee annual reports, and information gathered during the November 2018 grantee convening.



Finding: Grantees have found MacArthur Foundation-facilitated collaboration to be a key successful feature of the strategy. Grantees find that capacity-strengthening gatherings provide technical, mentor, and peer support.

In qualitative interviews, grantees cited a number of benefits of collaborative opportunities created through the On Nigeria-organized cohort meetings for grantees working within a module. These benefits included reducing geographical and programmatic redundancies across grantees; supporting strength of efforts; learning about new partners to engage with; and learning about new tools/training curricula/stakeholders to consider.

I know the MacArthur Foundation has more than 80 CSOs working on these projects... That is their strength... The ability to bring everybody together and form cohorts for information and experience sharing. That helps to prevent duplication of efforts and fosters collaboration. – Qualitative interview: UBEC grantee

Some HGSF grantees explicitly mentioned that the quarterly cohort meeting, which had started just before the 2018 qualitative data collection, resulted in various grantees modifying the LGAs where they were working to avoid duplication.

On Nigeria had not convened all module groups prior to 2018, and one electricity grantee requested in their annual report that the MacArthur Foundation facilitate a meeting for all electricity grantees to create better synergy among them, particularly given the range of actors they represent.

Grantees appreciate capacity strengthening they have received in project design, monitoring, and data collection, as evidenced in qualitative interviews and grantee annual reports, and they desire more training in areas related to effective communication, project monitoring, media engagement and data visualization.

The kind of guidance... [that is] providing us with knowledge and enhancing our capacity to implement our projects more effectively; e.g., providing us with mentors through the capacity trainings and workshops MacArthur has organized. – Qualitative interviews, 2018: Criminal justice grantee

Grantees in several modules (criminal justice, electricity, and UBEC) explicitly mentioned the important role media can and are playing as a means of amplifying “voice” and increasing key stakeholders’ responsiveness, and would like more capacity building in making the most of and engaging effectively with the media.

Grantees appreciate the check-ins with the program team and mentors provided through the Monitoring and Evaluation Technical Assistance contract who supply capacity-building support to help them focus their own grant strategy and efforts relative to the On Nigeria strategy overall.



Finding: Grantees seek more opportunities to expand on previous training in ways that support project success, and seek more strategic opportunities to work together. Grantees describe the MacArthur Foundation’s support in expanding On Nigeria’s reach, further scaling up programs, and adding new focus areas as key to ensuring program’s success.

In qualitative interviews, grantees from all modules (except UBEC) spontaneously identified areas for expansion to ensure spread and scale-up of On Nigeria’s results. These areas included additional focal areas, geographic expansion, or engaging new stakeholder groups.

Bring in more schools on board so that the monitoring activities by current grantees can cover a wider sample space and lead to better monitoring and evaluation. We also look forward to more local partners being involved in the monitoring and evaluation training because all trainers so far have come from abroad. – Qualitative interviews, 2018: HGSF grantee

Some grantees identified all three elements as important, while others identified just one or two. Examples include:

- Reaching more government and elected officials with ACJA-related training
- Expanding to additional DISCOs and more rural areas to address electricity corruption
- Engaging more actors along the supply chain for HGSF (e.g., farmers, food distributors)
- Incorporating a gender lens and increasing gender diversity in sectors and echelons
- Further expanding the network of reporters and topics covered
- Recognizing the value of engaging more public officials in general

At the November 2018 convening, grantees reflected on changes or adjustments that would strengthen outcomes. Some suggestions emerged:

- UBEC grantees noted the importance of engaging community members not only in monitoring, but also in the project selection process during the development phase of State Action Plans. This is important in ensuring the right projects are funded.

- HGSF program grantees recognized the role of head teachers in monitoring the HGSF and vendors, and the need for approaches to protect teachers who speak out about what they are seeing related to HGSF program in their classrooms.
- Grantees across modules spoke to the challenge of states not complying with federal FOIA and public office holders' knowledge about freedom of information laws across the country, including at SUBEB and other levels.
- Electricity grantees noted the important effects of active consumer-level corruption on both DISCOs and customers, including unregistered electricity consumers, through bypassing and tampering or theft and vandalism. They expressed concerns that illegal consumer siphoning might be interfering with DISCO customer service and costs and, if not addressed, can obscure the results of other anticorruption efforts.

5 Conclusions

The ultimate goal of On Nigeria is to reduce corruption by supporting Nigerian-led efforts that strengthen transparency, accountability, and participation through the sectoral accountability portfolios in the UBEC, HGSF, and electricity modules, complemented by the systems-focused work in criminal justice reform and strengthening media and journalism, and cross-cutting activities that reinforce and transcend the individual modules. Because On Nigeria has several areas of work, the strategy-level outcomes represent a synthesis or “roll-up” of module-level and cross-cutting efforts to expand the number of anticorruption champions, support the government’s ability to confront corruption broadly, and ultimately, shift social norms and behaviors. From this first report on baseline and early progress, several conclusions emerge that will be important for both the MacArthur Foundation and its grantees as they consider actions for 2019 and beyond.

Across sectoral modules (UBEC, HGSF, and electricity) and systems-level modules (criminal justice and media and journalism), there is generally evidence of initial progress, momentum, and traction. Exhibit 62 summarizes the progress in the individual modules. Electricity and criminal justice show progress in the greatest number of outcomes, followed by media and journalism and HGSF, and UBEC with the most limited results to date. Differences in the extent of progress depend on a variety of factors, including the degree to which prior practices were ingrained, political will to create change in the sector, and the effect of the broader contextual factors on specific areas of work.

Exhibit 62: Summary of progress across the modules and at the strategy level

Level of Theory of Change	UBEC	HGSF	Electricity	Criminal Justice	Media and Journalism	Strategy
Interim – Capacity Building						
Interim – Collaboration						
Interim – “Voice”						
Interim – “Teeth”						
Long-Term Outcomes						
Impact						

There are signs of momentum related to each component of the “sandwich,” although components are proceeding at different speeds and vary by module. Overall, On Nigeria has generated the most momentum around “voice” actions because the civil society, media, and citizens have quickly mobilized to monitor services and advocate for rights in intervention areas. Of the three sectoral modules, electricity has seen the most pronounced momentum for “voice”—data indicate that citizens’ interest is very high. Media and journalism module has conducted substantial reporting on corruption topics related to On Nigeria since 2016. Collaboration, meanwhile, has shown the most consistent progress across modules as diverse actors have come together, particularly On Nigeria

grantees and key “teeth” actors. Capacity building has been the focus of substantial grantee work to date; nevertheless, in all three sectoral modules that involve service delivery, the public’s limited knowledge of the programs and their rightful entitlements has appeared as a limiting factor. This is the most pronounced in UBEC where entitlements are the most complex and less readily visible. However, it also emerges as a limiting factor in electricity and HGSF. In criminal justice and media and journalism, capacity building has focused more on specialists and practitioners; it appears strong in the former, while still growing in the latter.

Of the four approaches of the “sandwich” strategy, evidence of tangible progress is the most limited with “teeth;” there are instances of government creating and strengthening transparency and accountability to address corruption through regulations and sanctions, but these instances appear more isolated. Progress has been the most evident in areas occupying the federal executive’s focus, particularly around cross-cutting On Nigeria work related to the broad anticorruption fight spearheaded by the PACAC. The National HGSF Program and electricity have also seen several regulations, although the level of sanctioning is unclear and “teeth” actions appear the least present in UBEC. Separately, the increasing number of states passing ACJ laws is steadily improving the criminal legal framework for the anticorruption fight. Government response has often been the most visible when media grantees’ reporting brings attention to corruption; however, responses have not always focused on addressing the underlying problem.

Data are more limited for assessment of progress related to long-term outcomes and impact; many of these are measured through the national telephone survey, which has had only one round. Therefore, no comparison over time is possible yet.

The cohort approach, whereby the MacArthur Foundation convenes grantees (within modules or for specific approaches), has been productive in fostering coordination and effective use of resources. The cohort approach has been particularly effectively for HGSF and criminal justice modules. For HGSF, it has fostered coordination across the two intervention states, between state groups and the national coordination office, and among grantees, creating a nascent “voice” movement of monitors who are pushing openness and accountability. For criminal justice, the cohort approach has increased the effective use of resources, with grantees actively developing and deploying training and tools across the country to increase capacity for ACJA statute implementation. Grantees are advocating for and monitoring additional progress, with shared accountability across the portfolio. Emerging results are also evident for UBEC and media and journalism. For electricity, the cohort approach was being introduced at the time of data collection for this synthesis report and it is too early to report on its effects. As might be expected at this early stage in implementation, there is room for more synergies within and across modules.

The broad On Nigeria strategy to address corruption in Nigeria continues to be relevant to existing public priorities, as well as political windows of opportunity. Corruption continues to rank as a high priority for Nigerians, and the existing windows of opportunity appear to still be open, while new windows On Nigeria can leverage are opening. The elections of 2019 offer one such window to engage society in corruption dialogues.

In its first couple of years, On Nigeria has laid a strong foundation to contribute to the long-term achievement of reducing corruption in Nigeria, but more time will be needed to see results. Based on the findings in this report, grantees are implementing the intended interventions, and more importantly, these activities are beginning to effect changes consistent with the strategy’s theory of change. Progress and momentum exist, especially with regards to interim outcomes related to “voice,” “teeth,” capacity building, and collaboration. This progress and feedback from grantees affirm the strategy is relevant and grounded in both Nigeria’s context and anticorruption models. It is also comprehensive and responsive to priorities at multiple levels of Nigerian society, eschewing narrower technocratic approaches sometimes used in donor-funded anticorruption work. The development of this plausible strategy is a key early implementation success, particularly in the challenging field of anticorruption work. More broadly, On Nigeria is supporting a large and growing coalition of stakeholders, thus strengthening On Nigeria’s capacity to contribute to the anticorruption struggle.

Because achieving sustainable anticorruption progress involves multiple changes in a society’s social and governance norms in addition to the technical institutional work, it is inherently a long-term process. The number of countries that have successfully navigated this transition in the modern era is small so there is a relatively limited sample from which to draw empirical evidence regarding plausible time horizons for this transition. However, scholarship speaks in terms of multiple years or even decades to achieve shifts that go beyond headline prosecutions. Estonia and Georgia, two recent anticorruption achievers with rapid transitions, for example, both took close to 20 years to achieve control of corruption.¹⁶⁶ In this context, it is clear that On Nigeria will require a long timeframe for anticorruption gains to extend beyond the specific targeted schools and localities within targeted states and DISCO catchment areas, and beyond targeted states and the targeted sectors of UBEC, HGSF, and electricity. Efforts to effect both behavior and norm changes in the Nigerian public more broadly will also need many years.

On Nigeria’s efforts have contributed to momentum related to anticorruption efforts of civil society, government, and private-sector actors. This momentum does not guarantee continued progress, but confirms that efforts to date have value and should be continued.

¹⁶⁶ Mungiu-Pippidi, Alina. *The Quest for Good Governance: How societies develop control of corruption* (2015) and *Transitions to Good Governance: Creating virtuous cycles of anticorruption* (2017).

Annex 1: On Nigeria Theories of Change and Measures – *under separate cover*

Annex 2: On Nigeria Grantees by Module – *under separate cover*

Annex 3: Detailed Evaluation and Learning Framework – *under separate cover*

Annex 4: Data Collection Instruments – *under separate cover*

Annex 5: Documents Reviewed by Module – *under separate cover*