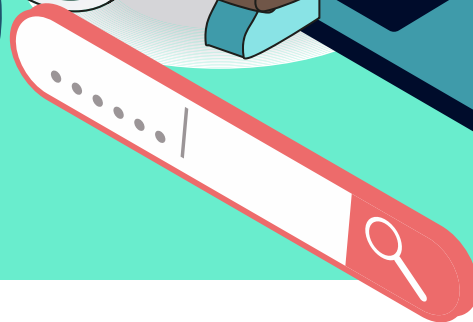
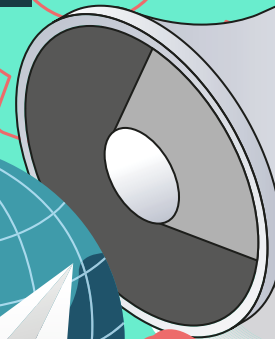


MOBILIZING CITIZENS
TO INVESTIGATE
CORRUPTION AND DEMAND
GOVERNMENT ACTION
IN NIGERIA



TRANSPARENCY &
ACCOUNTABILITY
INITIATIVE



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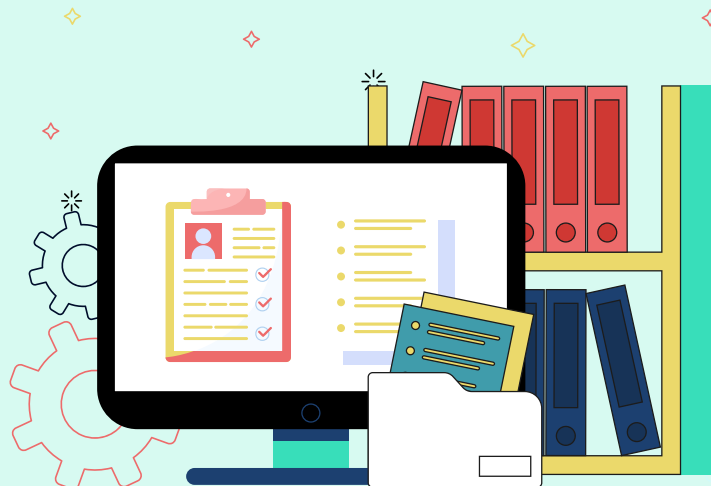
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ABOUT THE TRANSPARENCY AND ACCOUNTABILITY INITIATIVE

The Transparency and Accountability Initiative (TAI) is a donor collaborative whose members have over \$600 million in active grants working toward a world where citizens are informed and empowered, governments are open and responsive, and collective action advances the public good. Our members are the Chandler Foundation, the Ford Foundation, Luminate, the MacArthur Foundation, the Open Society Foundations, the Skoll Foundation, the United Kingdom Foreign Commonwealth and Development Office, and the William and Flora Hewlett Foundation.

ABOUT GLOBAL INTEGRITY

Global Integrity (GI) is a learning-centered organization that connects frontline actors and global players to help them navigate complex governance challenges with a systems change mindset. GI aims to support locally-led efforts to solve governance-related challenges and to ensure that public resources are used effectively, to deliver public services, and to meet people's needs.

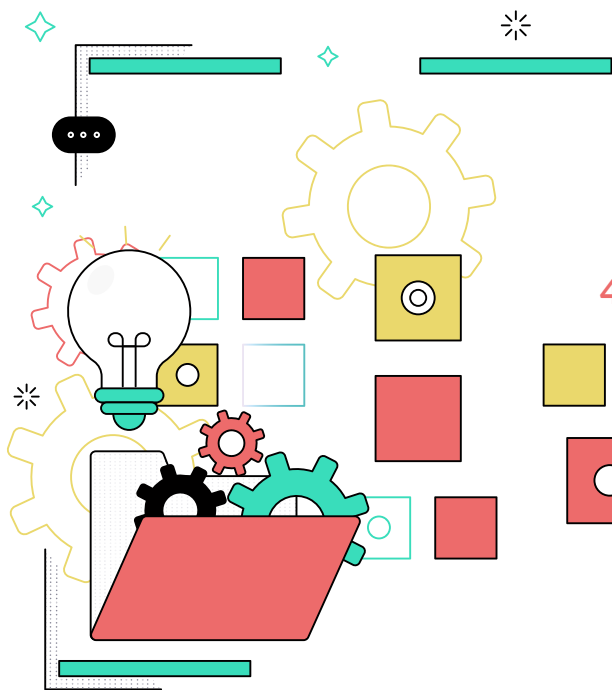


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EXECUTIVE SUMMARY

The Transparency and Accountability Initiative (TAI), a collaborative of leading funders of good governance programming around the world, launched its Data for Accountability (D4A) project to investigate ways to boost uptake of government data disclosures. After a field scan, TAI and its partners undertook detailed data use assessments in Colombia and Nigeria. Those findings prompted grants to test hypotheses on improving data use for greater accountability. Upon completion of those grants, TAI and its learning partner, Global Integrity (GI), have documented the findings.

This report condenses lessons from the D4A initiative in Nigeria, using evidence from a collaboration with the Human and Environmental Development Agenda (HEDA) and the Public-Private Development Centre (PPDC) in projects related to the use of data for accountability. HEDA's project focused on fostering collaboration in carrying out and following through investigations into stolen public wealth and assets, while PPDC's project focused on improving procurement data publication and use.

Both projects were effective, to different extents, in promoting **increased data use by target audiences** which included government, civil society, and media. Their approaches enabled the use of data by: **understanding the interests and needs of their audiences; providing tailored support to existing initiatives; and incentivizing collaboration among different audiences.**



CHANGES OCCURRED IN RELATION TO FOUR KEY ASPECTS:

CAPACITIES – increasing participants' awareness about what data is available and how to request additional information, as well as ways to use data.

OPPORTUNITIES – enabling participation in multi-stakeholder groups, carrying out investigations, and monitoring the use of public money.

MOTIVATION – improving participants' perception about how using data and collaborating with others could boost efforts to generate stories, advocate for improvements, and demand corrective action.

USAGE – using data to carry out investigations and publishing them, engaging governments to request changes, and filing complaints or requests for investigations.

HEDA and PPDC focused their efforts on supporting stakeholders that already had some knowledge and experience in asset tracing and public procurement, respectively, aiming to strengthen their capacities and helping them to build up their networks and collaboration with other participants and key stakeholders.

Participants in project activities reported changes in responses by government and anti-corruption agencies after their engagement with PPDC and HEDA. There were **improvements in the publication of data, corrective actions to invest further resources to finalize and deliver public works, and the initiation of investigations related to illicit assets.** The strategies for encouraging government response varied due to PPDC and HEDA:

- Using different tactics for engaging government agencies, depending on the role that they play with regard to public funds.
- Tracing the flow of public resources and related decision-making responsibilities to identify entry points for engagement.
- Acknowledging prevailing practices and capacities of the government agencies involved, and adapting programming accordingly.

DONORS CAN IMPROVE THEIR SUPPORT FOR THE USE OF DATA FOR ACCOUNTABILITY IN NIGERIA AND ELSEWHERE BY FOLLOWING THESE KEY RECOMMENDATIONS:

1. Embrace complexity in data for accountability programming by:

- Supporting projects that prioritize the use of data as a way to address sectoral or corruption problems and work backwards to improve the supply and use of data where it enables use.
- Investing in generating evidence about the incentives, relationships, and institutional factors that prolong problems related to corruption, the misuse of public resources, and a lack of transparency, as well as in strategies that can contribute to shifting these incentives, relationships, and institutional factors through the use of data.
- Incentivizing innovative approaches to enable multi-stakeholder problem solving on sectoral and corruption issues – building on existing spaces such as the Open Government Partnership (OGP) and the Extractive Industries Transparency Initiative (EITI) – and fostering these processes through the use of data.

2. Revisit assumptions related to the use of data for accountability with grantees and other stakeholders by:

- Creating opportunities for peer learning and reflection across data for accountability initiatives about how they have, and can, improve their programming by:

- Using the different roles that government agencies can play in addressing sectoral or corruption problems to advance their goals.
- Identifying and using political opportunities and institutional dynamics to improve the availability and use of data to inform decision-making, action, and citizen engagement.
- Filling data gaps and generating information about political, cultural, and institutional dynamics, at the national and subnational levels, that can enable them to overcome challenges with government transparency.
- Building capacities to create opportunities for relationship building and the identification of opportunities for collaboration across target user groups.

- Increasing dialogue among donors (including TAI members, non-TAI members, and multilaterals) to improve coordination among portfolios at the national and subnational levels.

3. Strengthen grantee monitoring, evaluation, and learning (MEL) capacities and incentives for using evidence to adapt project implementation

- Incentivizing early and continued revisions to the design of projects and activities, especially with regards to participant selection, approaches for engaging government agencies, and the contribution of data use to increased responsiveness and accountability related to sectoral and corruption problems.

- Proactively discussing with grantees how their experience confirms or refutes assumptions about the effect of institutional and political dynamics on their plans to promote the use of data for accountability and their organizational strategies.
- Providing grantees with more tailored guidance and support in terms of how to define sectoral and corruption related problems and the contributions that the use of data can bring to addressing these problems.
- Supporting grantees' use of MEL through the increased allocation of funds or on-demand external support, as well as more focused follow-up on their use of MEL to improve project implementation and organizational strategies.



1

BACKGROUND

Members of the Transparency and Accountability Initiative (TAI), as well as many other donors, have [invested heavily](#) in increasing the accessibility and use of governance data. Despite increases in the availability of data in many countries, the successful use of this data by local activists to solve problems related to corruption and the misuse of public resources is rare and the impact of these investments remains limited. TAI's Nigeria [scoping exercise](#) hints at the causes of this impact gap, suggesting three barriers are especially important:

- Governance data is often neither user-friendly nor of sufficient quality to enable its use.
- Oftentimes, local stakeholders (e.g., civil society organizations (CSOs), journalists, governments, and others) lack the skills and resources to clean, analyze, or take action on the basis of governance data.
- Sectoral and jurisdictional silos prevent data users from collaborating to produce and use complementary datasets to fight corruption.



To explore this gap further and identify ways to address it, TAI launched the Data for Accountability (D4A) initiative, which included funding four projects in Nigeria and Colombia. Moreover, Global Integrity (GI) accompanied TAI in this initiative as a learning partner providing monitoring, evaluation and learning (MEL) support to the grantees, facilitating dialogue, acting as a bridge between TAI members and grantees, and distilling lessons from the work in each country and across countries. This report is part of a series of D4A outputs which also include: a [scoping report for Nigeria](#); landscape reviews for [Nigeria](#) and [Colombia](#); notes about donor collaboration in [Nigeria](#) and Colombia, and GI's role as learning partner; pieces drawing lessons from the work in Nigeria (this report) and [Colombia](#); and a [note](#) reflecting on the implications of these findings for future donor investments.

2

DATA FOR ACCOUNTABILITY PROJECTS IN NIGERIA

This report condenses lessons from the D4A initiative in Nigeria. It uses evidence from collaborations with Human and Environmental Development Agenda (HEDA) and Public Private Development Centre (PPDC) in projects related to the use of data for accountability to answer **learning questions** raised by partners and TAI donors.

THEME	LEARNING QUESTIONS
Facilitating data use by target audiences	What strategies are effective in facilitating data use among target user groups?
	How do these strategies differ across user groups and how do those differences affect the achievement of project goals?
Encouraging government response through the use of data	What strategies are effective in encouraging government agencies to take action to increase responsiveness and accountability?
	How do these strategies differ across administrative levels and how do those differences affect the achievement of project goals?

The projects in which TAI collaborated with its partners are briefly described in the table below. HEDA’s project focused on fostering collaboration in carrying out and following through investigations regarding stolen public wealth and assets, while PPDC’s project focused on improving procurement data publication and use. It is important to note that PPDC engaged a wide array of target audiences at the subnational level and supported them in using data for accountability, while its engagement at the federal level focused on the private sector as an initial effort to explore needs and interests, and how this user group perceived procurement data and the government’s [Nigeria Open Contracting Portal \(NOCOPO\)](#) platform. Thus, PPDC’s engagement with the private sector was limited to interviews with experts and the identification of recommendations that could inform the Bureau of Public Procurement’s (BPP) planned work with the private sector.

Their theories of change were as follows:

- **HEDA: Increasing the capacities of, and collaboration between, target audiences will lead to multi-stakeholder efforts to trace and repatriate stolen assets, and this will lead to an increase in investigations about tracing and repatriating stolen assets.**
- **PPDC: Improving the accessibility, availability, and quality of procurement data, and the capacities of target audiences for using the data, will lead to more effective use of data, and this will promote improved contracting disclosure practices by public institutions.**

PARTNER	TARGET USER GROUPS	TYPE OF DATA PRIORITIZED	MAIN ACTIVITIES IMPLEMENTED	GOALS
Human and Environmental Development Agenda (HEDA)	<ul style="list-style-type: none"> - Anti-corruption agencies - Journalists - CSOs - Nigerian diaspora 	<ul style="list-style-type: none"> - Politically exposed people - Property registries - Other data as useful 	<ul style="list-style-type: none"> - Training sessions - Targeted support for investigations - Anti-corruption situation rooms - Research 	Empower citizens and professionals with the knowledge and skills relevant for tracing stolen wealth and assets across Nigeria and in other countries.
Public Private Development Centre (PPDC)	<ul style="list-style-type: none"> - Procurement agencies - Line ministries - Private sector - Journalists - CSOs 	<ul style="list-style-type: none"> - Procurement data at the national and sub-national level 	<ul style="list-style-type: none"> - Human-centered design - Training sessions - Support for citizen oversight - Engagement to improve data publication 	Increase stakeholder understanding and use of public procurement data by particular user segments, and ultimately promote public institution disclosure practices that encourage greater data use.

The support provided by GI to partners consisted of generating evidence, enabling the use of that evidence to inform reflection and adaptation, and distilling lessons from this experience. The main sources of data about the implementation of partners' projects used throughout to inform partners' work and distill lessons were:

- Survey responses from HEDA's and PPDC's target user groups:
- Surveys to 46 participants in HEDA workshops
- Surveys to 12 participants in PPDC workshops in Kaduna and to 20 representatives from the private sector in Abuja
- In-depth interviews with 20 journalists, CSOs, and government experts on the issues covered by HEDA and PPDC
- Review of 30 stories developed by participants in HEDA and PPDC projects
- Indicator data collected by PPDC and HEDA as part of their MEL plans

■ Documentation from reflection sessions with PPDC and HEDA

TAI also relied on GI's experience on other projects related to the [use of data for accountability](#) in Nigeria and beyond

■ 3 FACILITATING DATA USE BY TARGET AUDIENCES

There are different ways in which the impact gap related to the use of data for accountability has been explored. One of the most common explanations for this impact gap has to do with the lack of capacities, opportunities, and motivation of those in government, civil society, media, and the private sector to use data in their daily work as a means to: flag instances of corruption; produce and publish investigations; collaborate in demanding government action and reform; and inform decision-making. This section summarizes how HEDA and PPDC approached engaging target audiences, and the successes and challenges they faced in doing so. Throughout the section, we distill reflections from their experiences that can be useful for organizations designing and implementing projects related to the use of data for accountability.

Both projects were effective, to different extents, in promoting data use by most target audiences. There were some minor

differences in how they engaged with these audiences, but the most relevant elements of their approaches to enable the use of data were: their understanding of the interests and needs of their audiences; the provision of tailored support to existing initiatives; and their efforts to incentivize collaboration among different audiences.

■ 3.1

Improvement in Data Use by User Groups

Evidence from the different data sources used for learning shows important positive changes in data use by target audiences. These changes occurred in relation to four key aspects:

CAPACITIES – increasing participants' awareness about what data is available and how to request additional information, as well as ways to use data.

OPPORTUNITIES – enabling participation in multi-stakeholder groups, carrying out investigations, and monitoring the use of public money.

MOTIVATION – improving participants' perception about how using data and collaborating with others could boost efforts to generate stories, advocate for improvements, and demand corrective action.

USAGE – using data to carry out investigations and publishing them, engaging governments to request changes, and filing complaints or requests for investigations.

Participants in HEDA's and PPDC's projects (see more on participant selection and engagement below) reported knowing about more data sources as well as an increased capacity to use the different data to carry out their investigative work. Participants working to trace illicit assets also reported improved capacities to get and analyze court documents as important sources for investigations. Those participants interested in monitoring public procurement also increased their ability not only to get and analyze data from procurement platforms, but also to request additional information to inform advocacy and engagement with public agencies.

This increased capacity, paired with support from HEDA and PPDC, led to participants reporting more cases to authorities and engaging these agencies in a more targeted way to increase the chances of achieving government responsiveness in the form of data quality, the initiation of investigations, and improvements in service delivery. TAI's partners documented 30 stories or investigations published, or yet to be published, by participants (see Annex 1) as well as 84 procurement monitoring reports.¹ Additionally, participants reporting cases to authorities increased for all user groups. Representatives from anti-corruption agencies who participated in HEDA's project reported increased capacity and interest to both use data in their work and to collaborate with CSOs and media to identify leads, initiate investigations, and support their work.

It is also important to note that engagement in HEDA and PPDC projects led participants to diversify the ways in which they started and carried out investigations. Out of the 30 stories reviewed, 11 were motivated by leads identified from data available in government platforms, eight were motivated by tracing funds allocated to government projects, six originated from the verification of projects that had not been successfully completed, and five started from

explorations about how politically exposed people have handled constituency projects. Participants then used other data sources and analysis (e.g., procurement, budget, project implementation) and also obtained additional information from freedom of information (FOI) requests, interviews with authorities and beneficiaries, and visits to project sites to complement the stories.

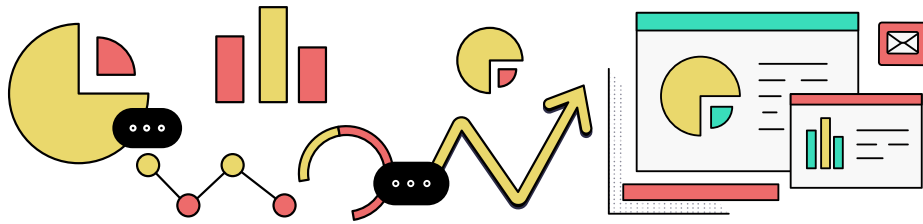
3.2

Strategies Used to Increase Data Use and Variation Across User Groups

Overall, both projects used similar engagement strategies with target user groups, including joint workshops, training sessions and continued support as they used data. These joint activities across user groups enabled collaboration and knowledge sharing among participants from different target audiences with several investigations involving both media and civil society, while also enabling participants carrying out such investigations to identify government contacts who could enable them to increase the chances of eliciting some form of response.

The main differences between project engagements were: how they approached understanding target user needs; how they used evidence to adapt the support they provided to participants; and how they promoted collaboration across user groups.

1. See some examples of these procurement monitoring reports [here](#).



3.2.1

Strategies Used to Increase Data Use and Variation Across User Groups

Both projects made intentional efforts to understand user needs as a way to inform project implementation, the design of training sessions and workshops, and the tailoring of other research and engagement activities. HEDA carried out pilot investigations with a small group of mentees that enabled it to assess the opportunities and challenges for using data to carry out investigations. This evidence highlighted:

- Data gaps that could be addressed through knowledge about local political dynamics and through additional research, including the creation of a database.
- Limits on the usability of data to kickstart formal investigations, as well as additional information needed.
- Areas of opportunity for combining data analysis with locally relevant information on political dynamics and the networks of politically exposed people.

Then, HEDA used lessons from these pilot investigations to develop the workshops and training materials, and to refine its approaches for supporting project participants in investigations and engagement with authorities.

PPDC carried out research to understand its target audiences' needs using a human-centered approach, which meant not only exploring data needs in the abstract, but also assessing how the context and participants' perception of it affected their interest in using data. Findings from the research included:

- Negative effects of the prevalence of informal procurement practices, based on access to decision-makers rather than on competence and due process, on the motivation of target audiences to engage with authorities, engage in data use, and use formal channels to report corruption.
- Potential bidders' perception of due procurement process as very costly and ineffective leads to a preference to rely on relationships, often transactional, to get insider information and increase the chances of winning contracts.
- Lack of access to key information on procurement processes, such as bills of quantity and payments, to enable timely and accurate monitoring.
- Deficiencies in government data management and stakeholder engagement hindering the use of the existing tools for disclosing project and procurement information.

These findings enabled PPDC to develop tailored recommendations related to sharing data and improving internal data management and documentation practices in the government, as well as to tailor its engagement activities with civil society, media, and the private sector.

Two important lessons can be distilled from HEDA's and PPDC's experiences using these methods for assessing user needs prior to the full deployment of activities for engagement with target audiences:

ANCHOR DATA USE IN PARTICIPANTS' KNOWLEDGE AND PRACTICE.

The evidence enabled partners to understand how their target audiences work and then find ways to make data more appealing and useful for them to achieve their goals. An example of this is how HEDA developed training sessions to meet gaps in participants' knowledge about the mandates and functions of anti-corruption agencies, to understand data and fill in common data gaps, to handle other relevant information such as court documents, and to effectively document investigations.

ADAPT SUPPORT FOR DATA USE BASED ON THE WIDER POLITICAL AND INSTITUTIONAL CONTEXT.

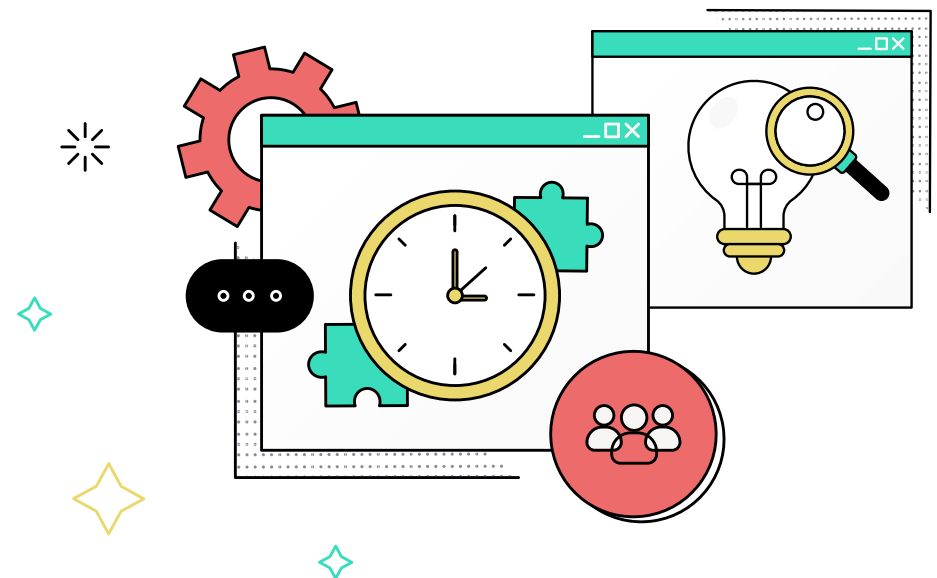
The research also enabled them to correct assumptions as to how participants could use data to get responses from the government. For example, by strengthening their convening and supporting role, they were able to ensure that participants not only understood how to get and use data, but also had entry points to reach out to government representatives and follow through with their requests for additional information and complaints

3.2.2

Strategies Used to Increase Data Use and Variation Across User Groups

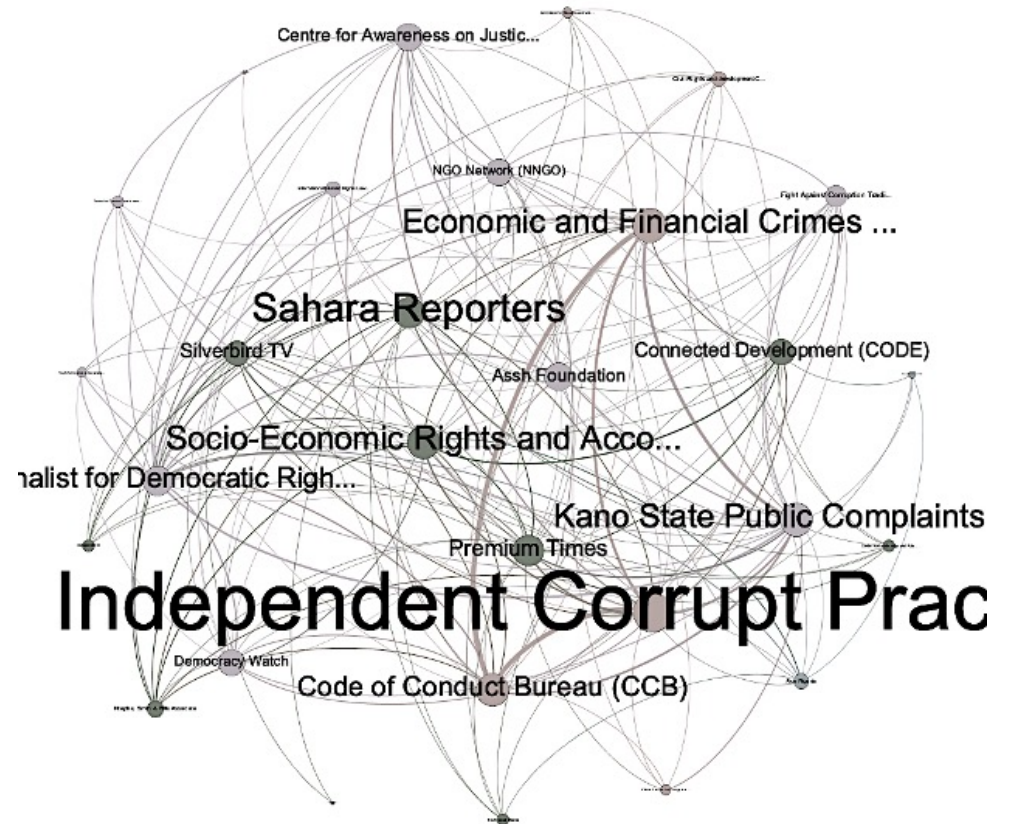
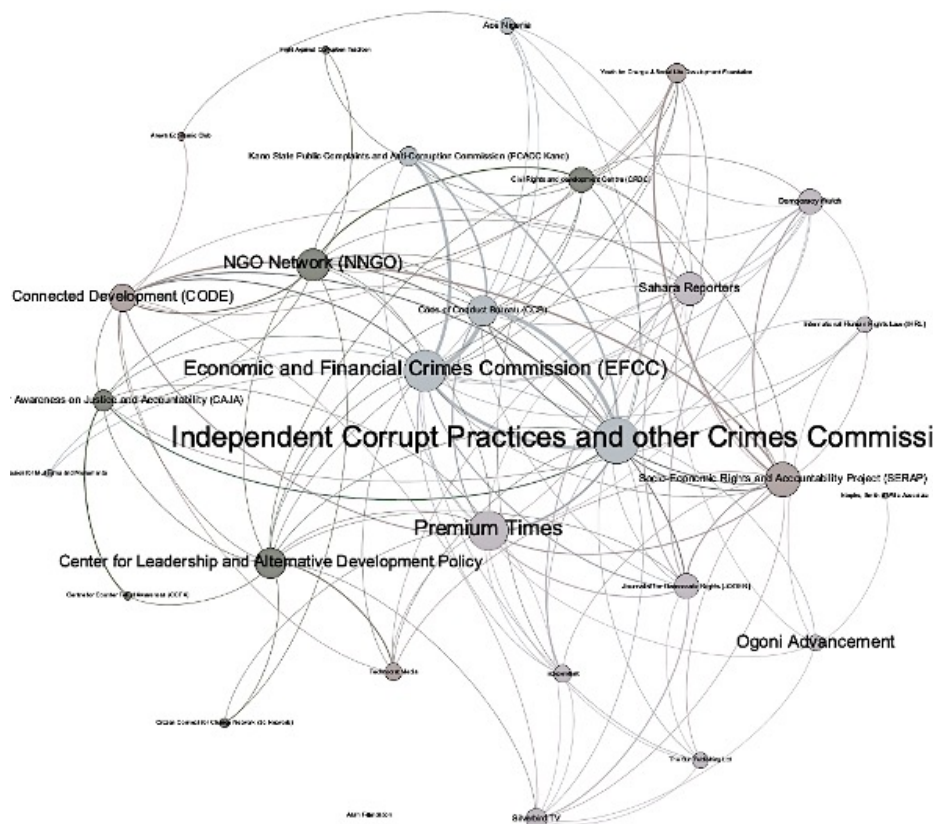
HEDA and PPDC focused their efforts on supporting stakeholders with some prior knowledge and experience in asset tracing and public procurement, aiming to strengthen their capacities and helping them to build up their networks and collaboration with other participants and key stakeholders.

HEDA relied on a widely disseminated expression of interest process to select participants in training sessions and workshops, as well as for the provision of grants and support to carry out investigations. This enabled HEDA to select participants who had experience tracing assets, to understand and manage participants' expectations, and to tailor how it presented concepts, data sources, and tools to make them more actionable for participants.



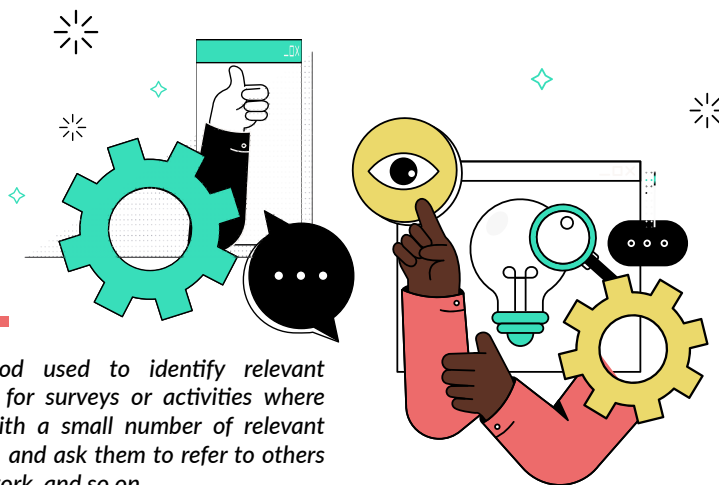
Increasing Collaboration and Action Among Anti-corruption Experts

HEDA's approach for participant selection enabled it to not only find people interested in data or people interested in corruption, but people who saw data as a way to advance their existing work. HEDA was quick to see that the level of participants' awareness about each other's work and collaboration among them was quite low. It tailored its approaches to promote participant engagement and collaboration, so as to ensure that participants got to know each other and were able to identify opportunities for collaborating in investigations and advocacy. The increase in collaboration among participants can be seen in the next two diagrams: The one on the left shows relationships (lines) among participants and the strength of those relationships (width of the lines) at the beginning of the project; and the one on the right shows the changes in these relationships.



PPDC relied on two different methods to select participants from target audiences. At the federal level, it combined the targeted selection of experts and representatives from the private sector with outreach to vendors providing services to the government. Building on its local networks at the state level in Kaduna, PPDC used a snowball method to reach out to organizations, community leaders, and youth interested in local development and monitoring public procurement.² It complemented this by collaborating with other organizations with local networks.

These methods had their pros and cons. On the one hand, reaching out to vendors at the federal level did not raise enough interest from them to participate, likely due to a lack of awareness about PPDC, NOCOPO, or even BPP, while using a snowball method only attracted a small number of highly interested participants to take part in workshops at the local level. On the other hand, tapping into private sector experts and representatives, and collaborating with organizations with strong local networks in Kaduna, enabled PPDC to target individuals and organizations that showed interest and were actively engaged in providing information and participating in procurement monitoring.



2. A method used to identify relevant participants for surveys or activities where you start with a small number of relevant participants and ask them to refer to others in their network, and so on.

There are two important lessons from these experiences:

■ APPROACH DATA AS A BOOSTER FOR ACTION, RATHER THAN A STARTING POINT.

By working with existing monitoring groups and participants with experience tracing illicit assets, HEDA and PPDC were able to focus their work on strengthening the capacities of participants and introducing them to different sources and methods of using data, rather than on introducing them to these themes and motivating them to take on new activities.

■ BE AWARE OF ALTERNATIVES AND BE OPEN TO ADAPTING AND REFINING PARTICIPANT SELECTION.

Whether it is by refining selection criteria, as in the case of HEDA, or by changing the methods for reaching out to participants, as in the case of PPDC, it is important to remain aware of the implications of new information and respond to implementation challenges. There is value in adapting project implementation to get to those likely to benefit the most and to be more engaged in promoting the use of data.

■ 3.2.3

Field Building Through Problem-centered Approaches

Both projects intentionally promoted collaboration across different user groups in the hopes that this collaboration would increase participants' motivation and opportunities to

use data. This assumption proved right as collaboration among target audiences was highlighted by project participants as an important outcome of their engagement with HEDA and PPDC. This enabled participants to:

- **Get to know like-minded people with whom they could exchange knowledge and opportunities.**
- **Find ways to address the challenges they face in terms of contacts to access information and colleagues who have specific capacities that can benefit their work.**
- **Identify entry points to advance their advocacy and engagement with government agencies.**

Two elements were important in HEDA's and PPDC's efforts to promote collaboration across audiences: including different types of target audiences in project activities and making evident to participants the benefits that could come from collaboration. HEDA included different target audiences in its training sessions, promoting linkages among participants interested in particular types of investigations and through the dialogue with government representatives in the [Anti-corruption Situation Rooms](#) (ACSR). PPDC supported monitoring groups made up of different target audiences, enabling sustained interaction, and invited participants to multi-stakeholder open contracting working groups.

Multi-stakeholder Collaboration for Fighting Corruption

HEDA has spearheaded an innovative approach to bring together stakeholders working on issues related to tracing and repatriating illicit assets and investigating other issues related to corruption: [Anti-corruption Situation Rooms](#)

[\(ACSR\)](#). This approach is based on quarterly meetings where representatives of anti-corruption agencies and civil society come together to discuss current issues, follow up on instances of corruption and related investigations, and identify opportunities for collaboration among participants. Often, these spaces include other relevant participants such as representatives from international organizations, anti-corruption initiatives, and subject matter experts to enrich the conversation and enable participants to envisage new ways to address challenges and make progress on their work. After each session, there is a public statement summarizing the conversation and highlighting next steps, and oftentimes participants continue to engage with others to carry out work.

These efforts were successful in part due to HEDA's and PPDC's ability to:

■ THINK RELATIONALLY ABOUT THE USE OF DATA FOR ACCOUNTABILITY.

It is common for projects to develop segment target audiences in order to focus capacity building and support. Even if this is the case, it is important to consider that, in order to use data for accountability, there are different actions that might be conducted more effectively by different target audiences, while building synergies across these audiences can raise the salience of programming, contribute to field building, and strengthen efforts to achieve government response.

■ USING PROBLEM-CENTERED APPROACHES TO INCREASE PARTICIPANTS' MOTIVATION AND OPPORTUNITIES FOR COLLABORATION.

The practical nature of the work that HEDA and PPDC conducted with participants (i.e., investigations and procurement monitoring) enabled participants to see the potential of data for identifying issues, as well as the need to combine data analysis with engagement with others in civil society and government to find different avenues to bring about change.

■ 4 ENCOURAGING GOVERNMENT RESPONSE

Data-driven programming often relies on overly technical assumptions about the way in which the publication of data on the allocation and use of public resources, as well as other data on decision-makers and the processes related to decision-making, can have a significant effect on preventing corruption, improving service delivery, and advancing development results. There are typical assumptions that the publication of data will make it harder to get away with

corruption and waste or that data publication will lead directly to increased government effectiveness in fighting corruption, and improved services delivery and decision-making. In recent years, these technical assumptions have begun to be questioned and paired with the inclusion of political and institutional variables.

The impact gap – the gap between the increasing disclosure of data and the effective use of that data to solve problems related to corruption and the misuse of public resources – relates to the ability of reformers to encourage government and accountability agencies to take action beyond the disclosure of information. In this section, we build on the efforts of PPDC project participants to achieve government action in the form of improved procurement data disclosure and corrective measures in project implementation, and the work by participants in HEDA's project to increase investigations into the misuse and appropriation of public resources.

■ 4.1

Ability to Elicit Government Response

Participants in these projects reported an increased responsiveness in relation to data management and publication, corrective measures by government agencies in local projects, and the initiation of investigations for misuse or appropriation of resources. HEDA and PPDC were able to achieve these results by creating opportunities for partners to engage government and accountability agencies in a targeted way, to build on existing relationships and spaces for collaboration with government, and to build up strong stories and monitoring reports that left authorities with little space to avoid or justify mismanagement or a lack of resources. The selected projects' focus on overseeing

the delivery of procured goods and tracing illicit assets did not provide opportunities to explore issues related to increasing participation in public decision-making through the use of data.

The government actions reported by participants did not happen in all the interactions they had with agencies. There were cases in which authorities refused to respond at all – poor response to access to information requests remains an important challenge – and cases where additional information was provided, but no corrective actions or investigations followed. These variations are a clear reminder that data availability and the use of that data is just one element, albeit an important one, in the diversity of actions required to prompt government response. There is no set roadmap to achieve government response.

It is also important to note that the challenges that HEDA and PPDC faced in enabling participants to achieve a government response varied by focus area. For example, PPDC identified in its user research that the strength of informal public procurement, based on relationships and often transactional, affects the incentives of ministries, departments, and agencies (MDAs) to comply with procurement regulation and data publication, limits the interest of target audiences in using procurement data, generates mistrust in engaging authorities for complaining about procurement processes, and reduces BPP's capacity to enforce procurement regulation. For HEDA, research about the institutional architecture for anti-corruption in Nigeria revealed how the overlap in the mandates of anti-corruption agencies, the poor coordination between them, their limited and conditioned budget, and their vulnerability to political interference limits their capacity and effectiveness to initiate investigations, sanction corrupt behaviors, and recover public assets.³

Participants in project activities reported changes in responses by government and anti-corruption agencies after their engagement with PPDC and HEDA. Below, we explore the factors that enabled or hindered these responses.

4.1.1

Improvements in the Publication of Data



PPDC's project combined working with procurement agencies (in Kaduna and at the federal level) and MDAs to improve how procurement data is managed and published, with support for local citizen monitoring in Kaduna to ensure that data was useful in monitoring the lawfulness and effectiveness of public procurement.

This approach enabled PPDC to increase the capacity and awareness of procurement agencies and MDAs to review their processes for collating and managing data, understand the value of improving the quality of the data published, and test ways to improve data publication to meet users' needs.⁴ It also provided an opportunity for government agencies and citizens to come together in efforts to try to increase the publication of data by MDAs and to improve the quality of data in existing systems.

³. See more about these challenges in this [paper](#) about the Economic and Financial Crimes Commission and the challenges in the implementation of the anti-corruption policies in Nigeria, and this [paper](#) about the challenges of tracing and recovering illicit assets in the Nigerian context.

⁴. As reported by BPP, KadPPA, and MDAs interviewed.

Improving Subnational Availability and Usability of Procurement Data

Continued support by PPDC to Kaduna's public procurement agency (KadPPA) and mobilization of citizens to improve the publication of procurement data led to the launch of the state level [open contracting portal](#). This portal complements the [Eyes and Ears](#) app and enables citizens to access different types of project and procurement information. This achievement can be traced to the continued support to KadPPA, the mobilization of citizens to increase demand for procurement data, and the creation of working groups that brought together these different stakeholders to solve problems related to data management and publication. This process has enabled continued collaboration, including activities such as training for MDAs and sensitizing the grassroots on the different means for engaging government agencies and increasing participation in governance. This approach has informed PPDC's work in other Nigerian states such as [Ekiti](#), [Adamawa](#), and [Anambra](#).

Participants surveyed in Kaduna reported important improvements in data availability and accessibility, but still saw challenges with regards to data usability, usefulness, and quality. Difficulties remain in accessing detailed procurement information such as bidders, bills of quantities, and prices. Monitoring is constrained by inadequate updating by MDAs and the persistence of gaps in information (e.g., no data on providers or estimated end dates). It is important to note that participants reported that Kaduna's public procurement agency (KadPPA) is now more willing to answer their queries and correct mistakes or gaps in the data. They attribute this

improvement to the existing collaboration between PPDC and KadPPA, and the relationship it has built with KadPPA staff through engagement in reviewing data publication and participation in the local open contracting working group.

The response was not the same in the case of engagement with BPP and the publication of procurement data on the NOCOPO platform. In this instance, PPDC's efforts focused on delivering the recommendations emanating from its user research to BPP, with no additional engagement with the private sector at the federal level. The lack of engagement with the private sector is explained by the fact that it was beyond the scope of PPDC's project and the decision by BPP to delay engagement with the private sector until the specific module for this NOCOPO user group was launched. To date, this module has not yet been launched.

4.1.2

Achieving Corrective Actions

In addition to government and anti-corruption agencies improving the publication of data or initiating investigations, PPDC, HEDA and their partners sought corrective measures from government agencies responsible for projects. Responses ranged from promises to invest further resources to finalize and deliver public works, to acknowledgement of responsibility for faulty budgeting and procurement related to projects, and to the initiation of immediate measures to report the cases to authorities and address the issues preventing the delivery of services. In most of these cases, the availability of contacts in government agencies for participants to reach out to and the strength of the monitoring reports and investigations were very important

to achieve responses. In other cases, often related to projects with complex management structures, participants received evasive answers, if any, about the use of resources or the delivery of projects, even with well documented investigations.

■ 4.1.3

Increasing the Initiation of Investigations Related to Illicit Assets

According to participants from the government, media, and civil society, HEDA's training of cohorts that brought user groups together and the use of ACSR's to encourage dialogue and collaboration with anti-corruption agencies led to important changes in the initiation of investigations. This approach helped increase participants' perception about their complaints receiving responses by authorities. Those in government agencies reported gaining more clarity and interest about the role that data can have in enabling them to identify leads to initiate investigations, and about their role in disclosing data to the public so they can collaborate in efforts to fight corruption.

Overall, respondents indicated that, after working with HEDA, their complaints have received responses in the form of continued engagement (e.g., by requesting additional information or collaborating to initiate investigations) or by actually initiating a formal investigation. It is important to note that the COVID-19 outbreak during the final part of the implementation of the project limited civil society and media efforts to file complaints and follow up with anti-corruption agencies on the investigations that had been initiated.

■ 4.2

Strategies Used to Elicit Government Response

In general, the ways in which the projects were implemented did not reveal major variations across levels of government, with the exception of user groups in PPDC's project: the focus at the federal level was on initial engagement with the private sector and, at the state level, it was on strengthening citizen-led monitoring of public procurement. However, during implementation, there were interesting differences in how participants used data to engage government agencies and how HEDA and PPDC created opportunities for participants to advance their work.

The strategies for encouraging government response varied due to three factors: the role that the agencies play with regard to public funds; the flow of public resources and related decision-making responsibilities; and the prevailing practices and capacities of the agencies involved.

■ 4.2.1

The Role That Agencies Play With Regard to Public Funds

PPDC's and HEDA's data-informed strategies paid attention to the different types of government stakeholders that could have a role in answering citizen complaints and acting on them. The three main types of government agencies involved were those mandated to coordinate data publication, those implementing projects, and those responsible for oversight. The different roles of these agencies, and the relationships between them and with relevant stakeholders, have important

implications for how and when to engage them, and how to move these engagements from conversations about data quality to effective corrective actions and investigations.

Data publishing agencies face important institutional and capacity challenges to ensure that citizens can access data. HEDA's and PPDC's support to these agencies focused on collaborating with them to improve data management, building capacities for managing large amounts of data, and understanding user needs and taking action to meet those needs. A clear example of this was the collaboration between PPDC and Kaduna's procurement authority, where they both trained implementing agencies on how to report data, address technical challenges related to the launch of the local procurement portal, and create opportunities for citizens to raise concerns regarding procurement data and processes.

Implementing agencies required a different approach for engagement due to their responsibilities in reporting data and delivering services, as well as their sectoral diversity. With these agencies, the engagement had three overlapping modalities:

- **Providing support to build capacities and generating incentives for reporting data.**
- **Requesting detailed information to inform public monitoring.**
- **Demanding effective corrective measures to ensure the adequate delivery of services.**

The results with these agencies varied, with many giving no response or dismissive responses, others explaining the administrative and institutional challenges that have

caused poor service delivery, and others taking corrective measures in project delivery. Success in the engagement with these agencies was influenced, to some extent, by the strength and quality of the investigations and the existence of relationships within the agency and with other relevant agencies. Strong investigations made it hard for agencies to avoid explaining faulty service delivery and motivated them to provide answers or take action, while existing relationships enabled participants to not only place a complaint, but also identify those responsible and explore ways to find solutions to the problems they were targeting.

Ensuring That Public Resources Are Actually Used: Zaria Public Library

A group of young citizens, Zazzau Monitors, is working to improve service delivery in Kaduna. These youth were puzzled by the current state of the Zaria Public Library, which used to be a landmark in the city, but has deteriorated due to a lack of maintenance and even faced challenges to deliver services with no access to electricity and water. Witnessing this situation led them to dig deeper into procurement data and to identify that there was a completed contract for the renovation of the library in 2017. Based on this information, they engaged the Kaduna State Library Board to figure out why the library was in such a state in spite of the recent renovation project. They found out that the contract was awarded but never implemented due to discrepancies between the board and the contractor, that the project was still in the state budget, and that there had been no further action in relation to the project since 2017. These youth requested the revocation of the contract

and the implementation of the project by awarding a new contract to a different contractor. They also got the relevant authorities to change the status of the project in government systems to enable the continued tracking of the awarding, implementation, and delivery of the project.

Engagement with oversight bodies needed to take into account the diversity of these agencies and their mandates, as well as the limits that these place on their potential to take action. The main approach used for engaging these agencies was to create spaces for sustained collaboration and dialogue. HEDA invited representatives from anti-corruption agencies to the joint training sessions to enable participants to better understand the institutional constraints they faced and to identify what findings from investigations can be more effective in triggering action by different oversight bodies. The ACSRs provided a complementary space for discussing and following up on investigations and complaints, enabling collaboration both among oversight agencies and among those agencies and project participants. Throughout the implementation of this project, PPDC identified entry points for engaging with anti-corruption agencies and explored different opportunities for using open contracting data that could enable these agencies to carry out their mandates in a more effective way.

Understanding the diversity of roles that government agencies play around the delivery of public services, and using this to inform program design and implementation, is key to effectively using data for accountability. Lessons from the work of PPDC and HEDA include:

■ USE A SYSTEMIC LENS TO DEVELOP AND IMPLEMENT STRATEGIES FOR ENGAGING GOVERNMENT AGENCIES.

There are different types of government agencies involved in service delivery and anti-corruption. Acknowledging this reality, and understanding the different agencies involved and the roles they play, enables a more strategic use of data. Such an approach can enable target audiences and organizations to find potential allies with similar interests and champions in other relevant agencies. In addition, it can mobilize incentives within government to strengthen advocacy and identify alternative ways to address problems related to corruption and the misuse of public resources.

■ ASSESS EARLY WINS IN THE INSTITUTIONAL AND POLITICAL CONTEXT.

It has been common to prioritize the disclosure of data in bulk as a technically strong part of strategies for governance reform. However, transparency alone will not change how different types of government agencies interact or how they act to enforce regulations or promote behavior change. Any transparency “wins” need to be assessed and selected based on politically aware assumptions about how they can contribute to incremental changes in stakeholder incentives and practices, and opportunities for collaboration beyond the publication of data.

■ 4.2.2

The Prevailing Practices, Incentives, and Capacities of the Agencies Involved

Both the user research and the work with mentees carried out by PPDC and HEDA respectively enabled them to identify limitations for transparency and accountability caused by the prevailing practices and institutional restraints of government agencies.

In the case of procurement, the co-existence of informal and transactional public procurement practices alongside formal procurement processes that public servants have little to no incentive to comply with, or report on, has implications for programming. It means that strategies to advance transparency and accountability need to use multi-pronged approaches to incentivize compliance and reporting, while reducing existing incentives to rely on informal procurement practices. PPDC's project enabled it to identify many of these challenges and refine its activities accordingly: testing new ways to incentivize agency reporting; identifying ways in which citizen monitoring can be more effective in engaging those responsible for poor service delivery; and beginning to understand how the private sector behaves and what approaches could be used to make it a key actor in changing public procurement.

In the case of illicit assets, and other related projects during this period, HEDA has highlighted the institutional limitations of anti-corruption agencies given their overlapping mandates, limited capacities, and weak coordination. The approach that it used in promoting collaboration across and amongst agencies and citizens has created opportunities to strengthen investigations, by enabling improved use of findings and more targeted inquiries related to the agencies'

responsibilities. It has also created incentives to advance those investigations through follow-up and continued dialogue about progress and challenges and how to address them. HEDA's and PPDC's efforts to provide participants with effective opportunities to engage government agencies and identify ways to coordinate with them offer two important lessons:

■ BALANCE THE USE OF DATA AS A TOOL FOR DEMANDING ACCOUNTABILITY AND ENABLING COLLABORATIVE PROBLEM SOLVING.

HEDA's project and PPDC's engagement in Kaduna show that organizations promoting increased use of data can strategically balance using evidence to demand corrective actions with collaborating with other government agencies to improve how they engage citizens and improve the dissemination and use of data. This strategic deployment of approaches takes advantage of different incentives and roles to promote incremental change in the relationships between government agencies and citizens, and how these agencies can act on findings and recommendations generated through the use of data.

■ APPROACH CAPACITY BUILDING AND SUPPORT DATA USE AS AN ADDITIONAL TOOL TO BUILD TRUST ACROSS TARGET AUDIENCES.

Capacity building efforts are always needed to contribute to change in the long term. These projects show that strengthening capacities needs to be seen as more than

explaining the value of openness and methods that can be used to achieve it. Capacity building can also be a means to generate trust, identify alignment of interests and opportunities for collaboration among stakeholders, and identify different entry points and ways to navigate political, technical, and cultural challenges that prevent responsiveness and accountability.

■ 4.2.3

The Flow of Public Resources and Related Decision-making Responsibilities

The investigative and asset tracing angle used by HEDA required participants to not only identify potential instances of corruption, but also uncover who was in charge of making decisions about the allocation of resources and the delivery of those projects. Identifying those decision-makers and the institutional arrangements for project implementation enabled participants to connect poor or non-existent service delivery to politically exposed persons and to identify potential instances of the misappropriation of public resources. Data was an important part of these efforts to place investigations into the wider governance context. However, it needed to be complemented with a nuanced understanding of the political dynamics at the levels relevant to a particular investigation or project monitoring effort. It is not the same to investigate a project that is funded by a ministry as part of a wider program, by a member of parliament using the resources for constituency development, or a project funded with state level resources. The institutional dynamics, the responsibilities for delivery, and the people who could benefit from the misappropriation

of resources vary widely. This needs to be taken into account at the time of demanding corrective action, filing complaints, and using stories to call for responsibility.

Resources Lost Along the Way to Service Delivery: Illicit Assets

HEDA's focus on tracing illicit assets required it to focus on different parts of the process, from budgeting to projects, and from allocating resources to delivering public goods and services. Investigations used information about politically exposed persons as a way to identify potential instances of diversion of resources and their impact on citizens' lives. This work led to different investigations at the international and national levels:

- **HEDA and the University of Kent explored practices and regulation related to illicit financial flows in Nigeria, the UK, and the United Arab Emirates. This research enabled them to identify challenges for tracing and repatriating illicit financial flows between the countries. It also led to the identification of unexplained wealth of former state governors in these jurisdictions.**
- **This three-part story (Part I, Part II, and Part III) tracing education resources managed by lawmakers for constituency and zonal intervention projects identifies instances of over-budgeting as well as limited or non-existent implementation of projects. The investigation led to different reactions from lawmakers, ranging from no response to the initiation of corrective actions to deliver projects.**

Similarly, in the case of PPDC's work in Kaduna, the focus on specific sectoral projects (whether delivered or not) enabled participants to place the data in the real world. In addition to validating the actual and appropriate delivery of projects, these efforts enabled them to better target their requests to the government agencies in charge of those projects, including corrections in data published, specific actions to correct poor service delivery (e.g., delivering the right number of schoolrooms or adequate equipment for health facilities), or measures to deliver projects that had been abandoned or never implemented.

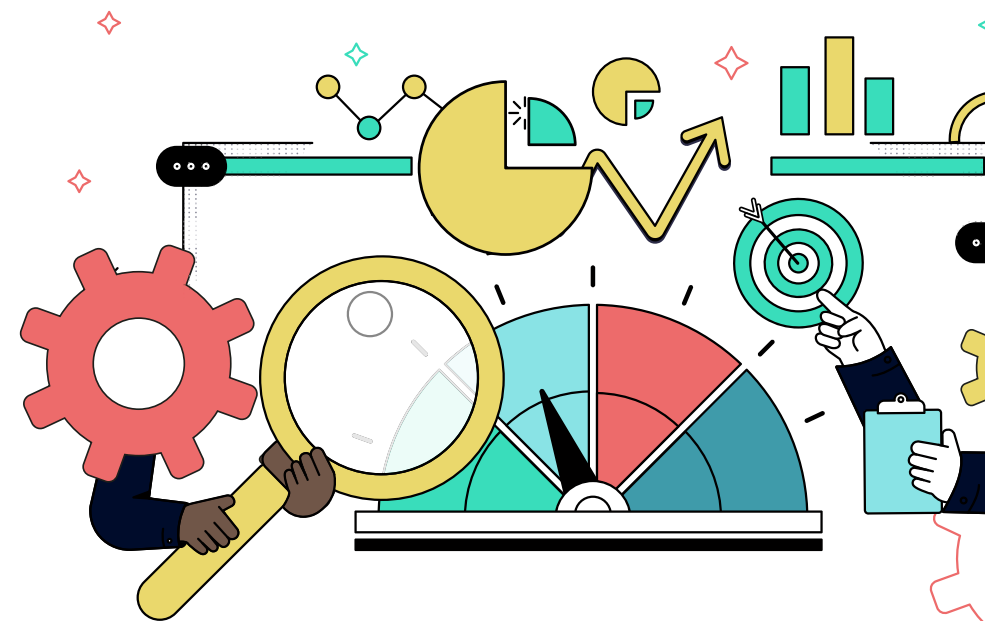
The efforts by HEDA and PPDC to strengthen investigations and advocacy based on data with relevant contextual information provide reflections about the opportunities and limitations of relying on increasing the publication of data:

■ PLAN FOR ADDITIONAL INPUTS NEEDED TO COMPLEMENT THE USE OF DATA PORTALS.

Participants' work in both projects benefited significantly from using data as initial points and complementing this data with research and existing knowledge about political dynamics, resource flows, and institutional goals. This enabled participants to point to potential wrongdoing, while also placing these instances into the wider context. This additional information contributed to building technically stronger cases, to demanding more detailed explanations from those who actually had a stake in decisions, and to creating compelling narratives that strengthen advocacy demands.

■ APPROACH DATA AS A TOOL FOR SHIFTING EXISTING BEHAVIORS AND DECISION-MAKING PROCESSES.

Data can only be an effective tool to drive effective service delivery and fight corruption if it is used to introduce new ways of understanding problems and devising solutions. Data-informed strategies need to be grounded in the existing practices, institutional mandates, and incentives of stakeholders, testing ways to use data to enable them to be more effective in what they do and to incrementally transform how they see their context and how they relate to others in this context.



5

IMPLICATIONS FOR DONORS SUPPORTING THE USE OF DATA FOR ACCOUNTABILITY IN NIGERIA

Several of the findings and recommendations presented by TAI in its 2018 scoping study remain relevant. Even with some progress in data availability since 2018 – such as improvements to the open treasury and the passing of the Company and Allied Matters Act that enables the implementation of a beneficial ownership registry – data access and use remains challenging. HEDA’s and PPDC’s work offer additional insights into the ways TAI members and other donors can improve their support for the use of data for accountability in Nigeria and elsewhere.

EMBRACE COMPLEXITY IN DATA FOR ACCOUNTABILITY PROGRAMMING

Both projects were initially designed with a quite linear idea of data use. Available data would be used by participants with increased capacities and that would increase the initiation of investigations, improve data availability, or lead to corrective actions in service delivery. However, during project implementation, both HEDA and PPDC experienced how these straightforward plans required many additional considerations and the use of increasingly diverse approaches

and tools to deliver results. This led to partners paying greater attention to other elements in their programming such as trust and relationship building, creating narratives around outcomes that motivated participants to engage, and acknowledging existing incentives and practices that will not change overnight.

These changes did not mean moving away from efforts to improve data availability, but it meant making it a secondary priority behind others such as multi-stakeholder engagement, storytelling, and problem solving issues that hinder government effectiveness and have a negative impact on citizens’ lives. Donors could build on these findings by:

- **Supporting projects that prioritize the use of data as a way to address sectoral or corruption problems and work backwards to improve the supply and use of data where it enables use.**
- **Investing in generating evidence about the incentives, relationships, and institutional factors that prolong problems related to corruption, the misuse of public resources, and a lack of transparency, as well as in strategies that can contribute to shifting these incentives, relationships, and institutional factors through the use of data.**
- **Incentivizing innovative approaches to enable multi-stakeholder problem solving on sectoral and corruption issues, building on existing spaces such as OGP and EITI, and fostering these processes through the use of data.**

REVISIT ASSUMPTIONS RELATED TO THE USE OF DATA FOR ACCOUNTABILITY WITH GRANTEES AND OTHER STAKEHOLDERS

Continued support by donors to the Nigerian government

and civil society organizations has contributed to the achievement of outcomes such as greater data availability, the consolidation of citizen-led initiatives testing innovative ways to use data, and the increased salience of data-based dialogue at national and local levels. The lessons from this progress and the innovations and the opportunities that they have created have not permeated further. Donors could build on this existing progress by:

■ **Creating opportunities for peer learning and reflection across data for accountability initiatives about how they have, and can, improve their programming by:**

- Using the different roles that government agencies can play in addressing sectoral or corruption problems to advance their goals.
- Identifying and using political opportunities and institutional dynamics to improve the availability and use of data to inform decision-making, action, and citizen engagement.
- Filling data gaps and generating information about political, cultural, and institutional dynamics at the national and subnational levels that can enable them to overcome challenges with government transparency.
- Building capacities to create opportunities for relationship building and the identification of opportunities for collaboration across target user groups.

■ **Increasing dialogue among donors (including TAI members, non-TAI members, and multilaterals) to improve coordination across portfolios at the national and subnational levels.**

STRENGTHEN GRANTEE MEL CAPACITIES AND INCENTIVES FOR USING EVIDENCE TO ADAPT PROJECT IMPLEMENTATION

Donors, including TAI members, have made more efforts to simplify grantee reporting requirements, strengthen capacities for monitoring and evaluation, and promote adaptive learning in project implementation. Yet, the capacities, guidance, and incentives for improved use of MEL by grantees remains low. Often, grantees face challenges to define clearly the problems related to corruption and the misuse of public resources they are aiming to address; track progress in project implementation related to the use of data, advocacy, and citizen mobilization; and use that evidence to reflect on assumptions and adapt project implementation. The weak use of MEL also relates to the lack of incentives for acknowledging failures, and to the lack of visibility and spaces for sharing and discussing project adaptations and MEL with donors, peers, and other relevant stakeholders.

This situation is not exclusive to data for accountability projects, but is heightened in this type of project due to the challenges in tying sectoral and corruption problems back to data availability and instances of data use. Donors can play a relevant role in improving the use of MEL to increase the effectiveness and impact of projects by:

- **Incentivizing early and continued revisions to the design of projects and activities, especially with regards to participant selection, approaches for engaging government agencies, and the contribution of data use to increased responsiveness and accountability related to sectoral and corruption problems.**
- **Proactively discussing with grantees how their experience confirms or refutes assumptions about the effect of**

institutional and political dynamics on their plans to promote the use of data for accountability and their organizational strategies.

- Providing grantees with more tailored guidance and support in terms of how to define sectoral and corruption related problems and the contributions that the use of data can bring to addressing these problems.
- Supporting grantees' use of MEL through the increased allocation of funds or on-demand external support as well as more focused follow-up on their use of MEL to improve project implementation and organizational strategies.





ANNEXES

ANNEX 1. STORIES FROM PARTICIPANTS' WORK

1 [How Niger State Lawmakers Are Under-developing Education Despite Multimillion-naira Intervention Projects \(part I\)](#)

Sahara Reporters
2020

2 [How Niger State Lawmakers Are Under-developing Education Despite Multimillion-naira Intervention Projects \(part II\)](#)

Sahara Reporters
2020

3 [Upper Niger River Basin Development Authority Indicted In Handling Of Constituency Project In Niger State \(part III\)](#)

Sahara Reporters
2020

4 [Abandoned N27bn Ogun Schools Sites Turn Criminals' Dens](#)

Daily Trust
2021

5 [Abandoned N27bn Ogun Schools Sites Turn Criminals' Dens](#)

Daily Trust
2021

6 *Amid Infrastructures deficit, N27BN model schools project abandoned, turned criminal havens in Ogun*

HEDA
2021

7 [Investigating Corruption in the COVID-19 Spending and MDA Transactions](#)

Independent
2020

8 [COVID-19 Procurement: Ministry of Water Resources erased ₦326 Million following FOI request](#)

Independent
2020

9 [SPECIAL REPORT: How inefficiency, lack of transparency flaw CBN's ₦50bn COVID-19 loan to small businesses](#)

Independent
2020

10 [FMC Yola updates COVID-19 contract details after Dataphyte investigation](#)

Independent
2020

11 [COVID-19 Investigation: How MDAs spent ₦4.2m on facemasks & ₦48.5m on laptops](#)

Independent
2020

12 [₦35m for Face Mask, ₦15m for Liquid Soap, How 5 Federal MDAs Mismanaged ₦1.69 Billion COVID19 Fund](#)

Independent
2020

13 [INVESTIGATION: COVID-19 Response Projects Worth ₦534.98 Million Awarded to Unverified Contractors](#)

Independent
2020

14 *Development of PEP list to support the fight against corruption in Nigeria*

Independent
Not yet published

15 *As corruption, kickbacks reign in the Nigeria immigration service, Abeokuta passport office*

Independent
Not yet published

16 *How Rivers Internal Revenue officers diverting Government funds into private account*
Independent
Not yet published

17 *How Boma Iyaye failed to develop sports in Rivers for 8 years*
Independent
Not yet published

18 *Corruption in Rivers State Judiciary*
Research on corruption as experienced by litigants/Court Users
Premium Times Centre for Investigative Journalism
Institute of Human Rights and Humanitarian Law IHRLH
University of Kent (Law School)
2020

19 *Irregularities Flood 17.3 Billion Naira Star Project Of Governor Okowa In Delta*
Independent
Not yet published

20 *Full report of 7 projects - Oyetunde Oluwatobi*
Independent
Not yet published

21 *Projects worth billions of naira are abandoned in Anambra state*
Independent
Not yet published

22 *How diversion of funds in NDDC led to abandoned projects as 29 contractors' jettisons sites in Ondo coastal areas, serving and ex-lawmakers fingered*
Technocrat Media
Not yet published

23 *Alleged Corruption and Breach of Due Process in the Allocation of Land Compensation to Farm Owners by the Officials of Kano State Bureau for Land Management.*
Kano State Public Complaint and Anti-corruption Commission
2020

24 *Robbing the poorest of the poor: a HEDA investigation report on allegations of corruption in the sharing of conditional cash transfer funds in Kano state*
Independent
2020

25 *Comfort Attah Research Report 2020*
Independent
2020

26 *Did former Uniben VC Prof Faraday Orumwense steal billions of public funds to buy an estate in Canada?*
Independent
2019

27 *A sea view into NPA's freebies to a UK Subsidiary*
Independent
Not yet published

28 [LGEA Faki Road: A Kaduna Primary School in dire need of help](#)
PPDC
2020

29 [The Zaria Sexual Assault Response Centre](#)
PPDC
2020

30 [Bring back the glory of Zaria Republic Library](#)
PPDC
2020

ANNEX 2. SUMMARIES OF HEDA'S AND PPDC'S MEL

Summary of [HEDA](#) MEL data

Summary of PPDC MEL data at the [federal level](#) and in [Kaduna](#)

MOBILIZING CITIZENS
TO INVESTIGATE
CORRUPTION AND DEMAND
GOVERNMENT ACTION
IN NIGERIA



TRANSPARENCY &
ACCOUNTABILITY
INITIATIVE