



Big Bet On Nigeria 2.0: Final Evaluation & Learning Synthesis Report

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Disclaimer

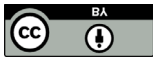
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Acronyms

ACJA	Administration of Criminal Justice Act
ACJA/Ls	Administration of Criminal Justice Act and Laws
ACJ/Ls	Administration of Criminal Justice Laws
ACJMC	Administration of Criminal Justice Monitoring Committee
ACTU	Anti-Corruption and Transparency Unit
CBO	Community-Based Organization
CISLAC	Civil Society Legislative Advocacy Centre
CJID	Centre for Journalism Innovation & Development
CMPA	Centre for Media Policy and Accountability
CSLS	Centre for Socio-Legal Studies
CSO	Civil Society Organization
EFCC	Economic and Financial Crimes Commission
EL Partner	Evaluation and Learning Partner
FCT	Federal Capital Territory
FGD	Focus Group Discussion
FIDA	International Federation of Women Lawyers
GESI	Gender Equity and Social Inclusion
ICPC	Independent Corrupt Practices and Other Related Offenses Commission
ICPC ACAN	ICPC Anti-Corruption Academy of Nigeria
KII	Key Informant Interview
LEDAP	Legal Defence and Assistance Project
MEL	Monitoring, Evaluation, and Learning
NGO	Non-Governmental Organizations
OGP	Open Government Partnership
PWAN	Partners West Africa, Nigeria
SNA	Social Network Analysis
TOC	Theory of Change
UNODC	United Nations Office on Drugs and Crime
USAID	United States Agency for International Development

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Executive Summary

Introduction

Launched in 2015, the John D. and Catherine T. MacArthur Foundation's ("Foundation") Big Bet On Nigeria aimed to fight the endemic corruption that affected Nigerians' daily lives and stymied Nigeria's development. Over the Big Bet's two phases (2015–2019 and 2020–2024), the program strategy focused on strengthening Nigeria's accountability ecosystem. In doing so, On Nigeria aimed to enable, foster, and create momentum for action and policy changes to prevent, prosecute, and reject corruption, generate signs of increased transparency, participation, and accountability, and ultimately contribute to reducing corruption in Nigeria in the long term.

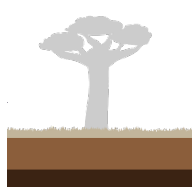
The Foundation made 340 grants worth \$154.1 million over the program's two phases. This evaluation report focuses on Phase 2.0, during which the program awarded 201 grants totaling \$88.06 million across four cohorts: Criminal Justice, Media and Journalism, Behavior Change, and Joinbodi (a Pidgin word that roughly translates to "solidarity").

Evaluation Approach

This final evaluation of On Nigeria was designed to be systems focused, inclusive, rigorous, and collaborative, aiming to deliver relevant lessons to inform future action. The evaluation questions focused on assessing On Nigeria's contributions to results and understanding On Nigeria's legacy. Co-created with the Foundation and a reference group comprised of Nigerian-based anticorruption and governance experts, the evaluation design adapted and combined several methods, including a social network analysis, 15 case studies, a review of hundreds of documents, and the Delphi technique, while also leveraging evidence from 22 existing learning briefs, reports, and case studies. The evaluation team used co-created rubrics to assess On Nigeria 2.0 contributions to the emergence of desired outcomes relative to a 2020 baseline. These rubrics assessed whether, how, and the extent to which improvements had taken place, or backsliding had been mitigated, in the various components of the theory of change. The evaluation culminated with a series of virtual and in-person participatory sensemaking workshops with the Foundation program team, the reference group, and grantees to make sense of and refine the emerging findings from the evaluation, collaboratively develop conclusions, and identify priorities for future action.

Evaluation Results

The evaluation contains 18 findings and five overarching conclusions, the latter of which are presented below and are mapped to the program's theory of change (see Exhibit 2 for the full theory of change):



Conclusion 1: The Nigerian context offered both opportunities and challenges for On Nigeria's work.

Overall, the window of opportunity for On Nigeria's work was open, but small, and evolved during Phase 2.0. The proliferation of social media and other technology, combined with issue-specific protest movements, fuelled a surge in civic participation, particularly among youth, and provided openings for the work of grantees and their partners to gain traction. However, the COVID-19 pandemic and its associated effects on the economy, shrinking civic space and insecurity, and turnover and distrust among key anticorruption actors shaped the challenging landscape in which On Nigeria operated.



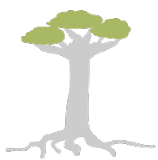
Conclusion 2: On Nigeria largely met expectations in strengthening multiple dimensions of Nigeria's accountability ecosystem, contributing to concrete progress and momentum.

Progress in the accountability ecosystem's collaboration, adaptive resilience, and diversity since 2020 is most notable, with more modest improvements in ecosystem scale and institutionalization. On Nigeria's programming and support built trust, enhanced shared learning, and incentivized collective action. On Nigeria's cohort model successfully fostered collaboration among grantees and beyond, and created opportunities for leveraging complementary skills and networks. On Nigeria's skill-building and organizational strengthening approaches, especially the Foundation's long-term funding and its Indirect Cost Policy, enabled grantees to improve capacity, innovate financially, and invest in institutional development. Many On Nigeria grantees contributed to increasing the diversity of the accountability ecosystem by engaging new participants, but there are still gaps in engaging historically marginalized groups (women, youth, persons with disabilities, and rural populations) in anticorruption initiatives.



Conclusion 3: On Nigeria largely met expectations of momentum and signs of progress in advancing the prevention, prosecution, and rejection of corruption.

While On Nigeria's progress was not always broad and deep, all 36 states now have laws enabling the Administration of Criminal Justice Act (ACJ/Ls), and most have Administration of Criminal Justice Monitoring Committees (ACJMCs), with gains in court efficiency and performance emerging in some states. Anticorruption agencies (ACAs) have improved some dimensions of their performance, despite ongoing concerns about their overall effectiveness and credibility. Grantee efforts have contributed to improved public awareness of corruption and anticorruption through better media coverage, public officials' stronger knowledge and anticorruption skills, and more religious leaders speaking out and modelling integrity for their congregations. The program demonstrated that shifting corruption-related social norms and behaviours among diverse groups is possible, even if change is gradual. On Nigeria programming contributed to these results by building on previous decades of work on legal reforms, and through its building of skills and supporting tools for organizations and individuals involved in anticorruption work, as well as its emphasis on collaboration and coordination among ecosystem actors. On Nigeria grantees effectively engaged an increasing range of audiences by leveraging traditional and digital platforms, GESI-informed approaches, and long-term messaging.



Conclusion 4: Consistent with expectations, On Nigeria has contributed to signs of momentum in advancing transparency and participation, noteworthy results given the long-term nature of systems change and anticorruption efforts.

By building on existing networks and leveraging previous institutional reforms, On Nigeria grantees and partners were able to enhance everyday Nigerians' participation in monitoring budgets and the flow of public resources and successfully push some government agencies to publish budget and other information. Evidence shows that these improvements contributed to observable, though modest, progress in aggregate transparency and participation. Grantees and their partners also extracted accountability in some specific instances, which helped the overall level of accountability to hold steady during the programming period. This lack of deterioration in accountability is notable, given the COVID-19 pandemic, destabilizing effects of inflation, and political turmoil since 2020.



Conclusion 5: On Nigeria has contributed to strengthening certain precursors for sustainable anticorruption efforts, including capacity advancements within grantee organizations, increased collaboration within the accountability ecosystem, and stronger legal frameworks governing the criminal justice system and anticorruption agencies, but sustainability is fragile.

These gains are sustainable in the short-term, but remain fragile, and long-term sustainability and scaling face several major challenges, especially: 1) time and effort needed to entrench new anticorruption social norms; 2) precariousness of ACAs' independence and effectiveness of other government agencies; 3) limits to ongoing funding for civil society organizations' anticorruption work; and 4) contextual factors such as high government staff turnover, insecurity, and shrinking civic space.

Priorities for Nigeria's Accountability Ecosystem: Future Action

There are a number of areas in which ecosystem actors and their partners should seek to build on, adapt, and improve the work of On Nigeria, as they try to achieve a self-sustaining and broad virtuous cycle of anticorruption action and successes. Key priorities for future action include:

Priority 1	Priority 2	Priority 3
Build on and further strengthen the mechanisms and habits of collaboration and adaptive learning On Nigeria supported, especially among government institutions.	Systematically share, adapt, and use GESI integration tools and approaches initially developed under On Nigeria to amplify the voices of historically disadvantaged groups.	Continue to invest in resourcing and training criminal justice actors at local, state, and federal levels across the country.
Priority 4	Priority 5	
Continue to expand the quantity and quality of media coverage, incorporate accountability and integrity topics in comprehensive civics education, and leverage novel methods and mediums to reach an increasingly broad range of groups.	Strengthen and scale the rollout and depth of community-focused transparency and monitoring platforms, promote transparent government processes and service delivery, and ensure corporations integrate ethical guidelines.	

Closing Reflections

Overall, On Nigeria supported the emergence of a robust accountability ecosystem in Nigeria, and laid the groundwork for continuing and new anticorruption actions in the future. Gains remain fragile, but all in all, the program made meaningful contributions. Reflecting on On Nigeria's experience, two lessons emerge that can be relevant for other donors and practitioners interested in advancing systems change efforts, including in sectors beyond anticorruption.



LESSON 1 (STRATEGY): On Nigeria's systems-focused strategy of resourcing and supporting dynamic, locally led, complementary, and flexible initiatives at multiple levels offers a viable approach for incrementally changing complex systems.



LESSON 2 (TACTICS): On Nigeria's ways of working, or grantcraft, were indispensable for the results to which it contributed. Its approach demonstrates the value of tailoring work contextually, proactively prioritizing and addressing grantee needs, and making

flexibility and local leadership central. While these are common refrains in contemporary social impact work and philanthropy, this “way of doing business” is rarer in practice.

1. Introduction

Launched in 2015, the John D. and Catherine T. MacArthur Foundation's ("Foundation") Big Bet On Nigeria aimed to fight the endemic corruption that affects Nigerians' daily lives and stymies Nigeria's development. Over the Big Bet's two phases (2015-2019 and 2020-2024), the program focused on strengthening Nigeria's accountability ecosystem. In doing so, On Nigeria aimed to enable and foster actions to prevent, prosecute, and reject corruption, create momentum for increased transparency, participation, and accountability, and ultimately, contribute to reducing corruption in Nigeria over the long term.

On Nigeria operated in a complex environment, in which relationships between cause and effect were dynamic, non-linear, and not always known at the outset. With this context front of mind, starting in 2015, On Nigeria's evaluation and learning partner (EL Partner—first EnCompass LLC, then Itad) used mixed methods, systems-informed evaluation approaches, and focused on supporting collective learning and adaptation to support the program. This report synthesizes learning from the final evaluation of On Nigeria's "2.0" phase (2020-2024), drawing on a range of sources covered in Section 3, below. The report responds to On Nigeria 2.0's overarching learning priorities: 1) understanding the strategy's contributions to results, and 2) understanding On Nigeria's legacy. Reflecting the systems lens that informed learning throughout both phases of the strategy, the report first considers On Nigeria's contextual landscape, before proceeding to conclusions, findings, and lessons. The primary audience for this report includes:

1. On Nigeria's grantees from both phases, who fulfill core roles within Nigeria's broader accountability ecosystem and whose collective story this report helps tell
2. Grantees' partners and other actors in Nigeria's accountability ecosystem, who have a strong interest in learning from On Nigeria's example in order to continue advancing accountability aims
3. The global community of systems change funders, anticorruption researchers, and accountability practitioners, who can learn from On Nigeria as an example of long-term, systems-informed accountability work that took a collective impact approach to pursuing change in a complex environment

This report is focused around On Nigeria's 2.0 phase, which began in 2020. However, the strategy recognized from its outset that effecting change in accountability is a long-term, non-linear, and inherently contextual phenomenon. To this end, the results of On Nigeria captured in this report inherently built on the work from the 1.0 phase, as well as the contributions of many other initiatives and the Foundation's own history working in Nigeria since 1994. Where the report identifies the program's results, this should be understood as shorthand for readability, and not an insinuation that On Nigeria 2.0 could have achieved these results in isolation from prior work. Similarly, the report recognizes that it is impossible to separate the "legacy" of On Nigeria's 2.0 phase from the broader decade-long legacy of the full Big Bet On Nigeria.

2. On Nigeria 2.0, Background Strategy, and Implementation

2.1. On Nigeria's Background

The MacArthur Foundation's Big Bets, launched in 2015, represented a shift from broad grantmaking to a few concentrated investments in high-stakes global challenges. Big Bets sought to help deliver transformational change and catalytic impact by committing large-scale funding over roughly a decade. Each Big Bet supported a mix of grantees (civil society, media, and institutions), using the Foundation's Design/Build approach and complemented by independent evaluation and adaptive learning. Each Big Bet had an in-depth strategy review at no less than the 5-year mark.

While most other Big Bets were globally oriented and outcome-driven, On Nigeria was place-based, deeply networked, and emphasized field-building, with a strong focus on navigating Nigeria's specific and highly complex context. Several contextual factors and windows of opportunity informed On Nigeria's efforts, including the historic 2015 election and the subsequent peaceful transition of power to an opposition party, Nigeria's first since its return to democratic rule in 1999. The new government committed to a host of anticorruption efforts and to restructuring several state-owned sectors, reflecting a unique alignment for reform within both elite and grassroots levels of Nigerian society. The Foundation, having cultivated deep and broad ties working in Nigeria since 1994, was well-positioned to support this nascent accountability movement. The Foundation's previous Population and Reproductive Health program had supported advocacy, accountability, research, and interventions that worked with grassroots organizations throughout the country. Meanwhile, its Nigeria Human Rights program had long supported reform of the criminal justice sector, laying the groundwork for the passage of the Administration of Criminal Justice Act (ACJA) in 2015 and forging connections with legal reformers, which would become a bedrock for a critical element in On Nigeria's strategy. Beyond Nigeria, the Foundation's support for independent media and its commitment to peace and justice connected the Big Bet On Nigeria to other areas of Foundation expertise and core institutional values. Since 2015, these initial windows of opportunity have evolved as described in Section 4, but ongoing evaluation and learning has consistently reconfirmed the opportunity for Foundation support change.

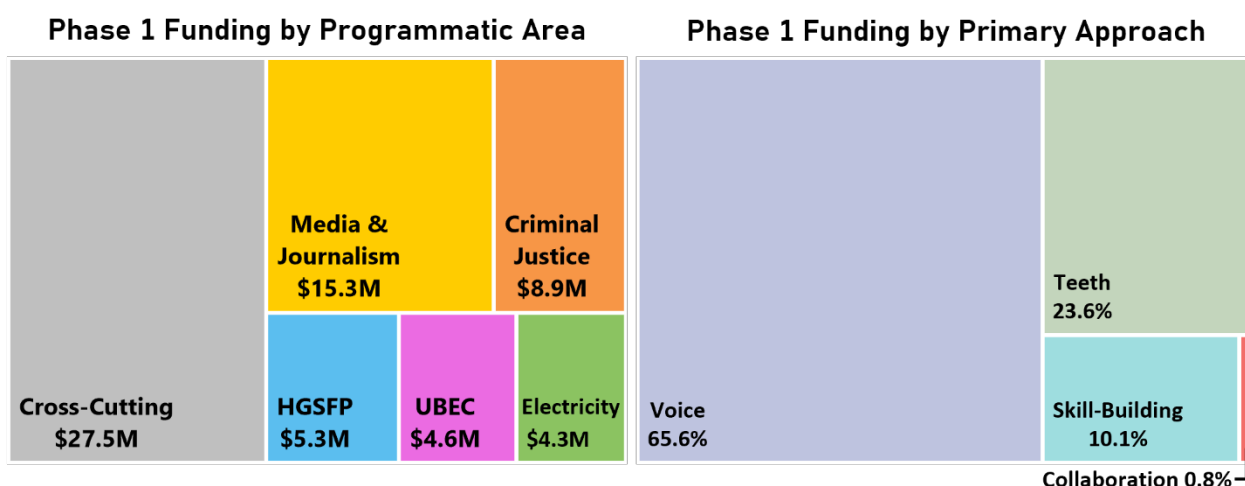
2.2. On Nigeria 1.0's Implementation

Between 2015 and 2024, On Nigeria awarded a total of 340 grants worth \$154.1 million to 135 organizations; this section provides an overview of the grants made during the 1.0 phase covering 2015 to March 2020. While the first grant began funded activities in June 2015, the Foundation's Board endorsed the full On Nigeria strategy in September 2016. During On Nigeria's first phase, the program initially funded work in four cohorts: criminal justice, media and journalism, electricity, and education. All four cohorts had launched by September 2017, and the majority of grants began funded activities by January 2018, including in many but not all cross-cutting areas. It later added grants in three cross-cutting areas: behavior change, civil society, and elections. Consequently, the amount of time available to achieve progress across program areas varied. By March 2020, the portfolio had made 138 grants totaling \$66.8 million.

As of March 2020, \$45.8 million (76 percent) of the approved funding had been disbursed to grantees; and grantees reported having spent approximately \$28.6 million (48 percent) of the

approved funds. The 138 grants during On Nigeria's 1.0 phase were made to 96 organizations, two-thirds of which were first-time MacArthur Foundation grantees. Just over three-quarters of the grants (106), representing 82 percent of awarded funds, were made to Nigeria-based organizations, with the remainder going to a mix of non-Nigerian implementers, researchers, and technical assistance providers. The exhibit below summarizes this grantmaking, showing the breakdown of grant funding by programmatic area, as well as grant funding by primary approach based on the strategy's conceptual framework (Section 2.3). Almost all grants entailed multiple approaches. For example, considering secondary approaches, 73 percent of On Nigeria 1.0 grants included collaboration activities.

Exhibit 1. Breakdown of On Nigeria 1.0 Funding



The Big Bet's initial Strategy Review occurred in early 2020, following an in-depth process of internal reflection, feedback, and evaluation and learning efforts. Evidence from this process is summarized in the On Nigeria's 2019 Evaluation and Learning Synthesis Report (published in February 2020).¹ The Strategy Review revealed that On Nigeria 1.0 contributed to increased accountability and transparency in several targeted geographies, sectors, and systems, and that most windows of opportunity remained open. However, to better suit the conditions in Nigeria and provide a better chance for sustainable change, the evaluation results suggested that On Nigeria would benefit from a more integrated strategy with an even greater focus on strengthening the accountability ecosystem. The Strategy Review also suggested a stronger emphasis on gender equality and social inclusion (GESI) would be useful, as did the Foundation's articulation of the Just Imperative.

2.3. On Nigeria's Conceptual Framework

Across both phases of work, On Nigeria's strategy built on Jonathan Fox's "sandwich theory" of social accountability.² The sandwich theory recognizes the interplay between a push from below and a squeeze from above to effect change and counteract resistance from vested interest. The push from below is the "voice," which represents citizens' actions to demand change and develop local solutions to combatting corruption. The squeeze from above is the "teeth," which represents the efforts of government and other high-level actors to develop and enforce laws and regulations, including implementing systems for transparency, monitoring compliance, and using incentives to discourage corruption and sanctions to punish it. On

¹ On Nigeria's 2019 Evaluation and Learning Synthesis Report

² Fox, J. 2015. *Social Accountability. What Does the Evidence Really Say?* World Development 72 (August): 346-361.

Nigeria harnessed the “voice” of Nigerian citizens and the “teeth” of Nigerian institutions; it combined this with skill-building and collaboration approaches for actors throughout the accountability ecosystem to address the problem of corruption in Nigeria. Reflecting evidence from the 2020 Strategy Review, On Nigeria’s 2.0 phase formally incorporated GESI as a fifth approach within its theory of change (TOC). While On Nigeria updated its TOC for the 2.0 phase to reflect changes to the strategy (section 2.4), the fundamental concept of the sandwich strategy cuts across both phases of On Nigeria.

2.4. The On Nigeria 2.0 Theory of Change

Given the complexity and entrenched nature of corruption, and recognizing the limitations of a ten-year timeframe, On Nigeria did not aim to eradicate corruption outright, but rather to contribute to its reduction. These expectations reflected the Foundation’s understanding that changing culture and social norms, systems, policies, and practice—all necessary for anticorruption efforts—takes time and iteration, with incremental improvements likely to emerge only in intermittent windows of opportunity.

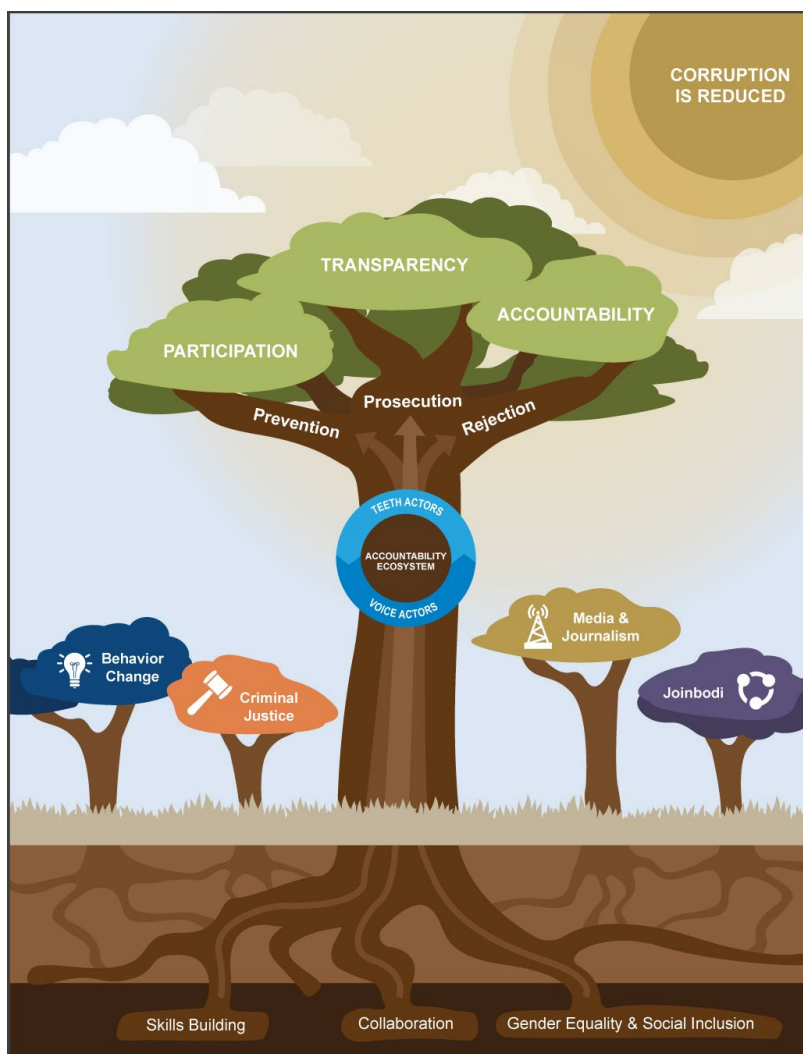
The On Nigeria 2.0 strategy sought to strengthen the accountability ecosystem—the dynamic relationships between, and practices and functions undertaken by, a diverse set of anticorruption actors representing civil society, the media, communities, and government. By contributing to the emergence of a more robust, resilient ecosystem, On Nigeria hoped to pave the way for systems and actions to more effectively prevent, prosecute, and reject corruption, which would eventually give rise to more transparency, participation, and accountability, and ultimately contribute to reducing corruption in Nigeria in the long term.

The program strategy is illustrated by the tree presented in Exhibit 2. Cohort-level outcomes feed into the strategy-level TOC, in which the accountability ecosystem is depicted as a sturdy trunk.

Anticorruption outcomes related to prevention, prosecution, and rejection appear in the branches, and transparency, participation, and accountability are in the foliage. Collectively, these impacts are intended to contribute to reduced corruption, represented by the sun, which creates momentum for further nourishing the entire system.

For a more detailed version of the TOC, including a full narrative, see [this TOC overview](#).

Exhibit 2. Big Bet On Nigeria 2.0 Theory of Change

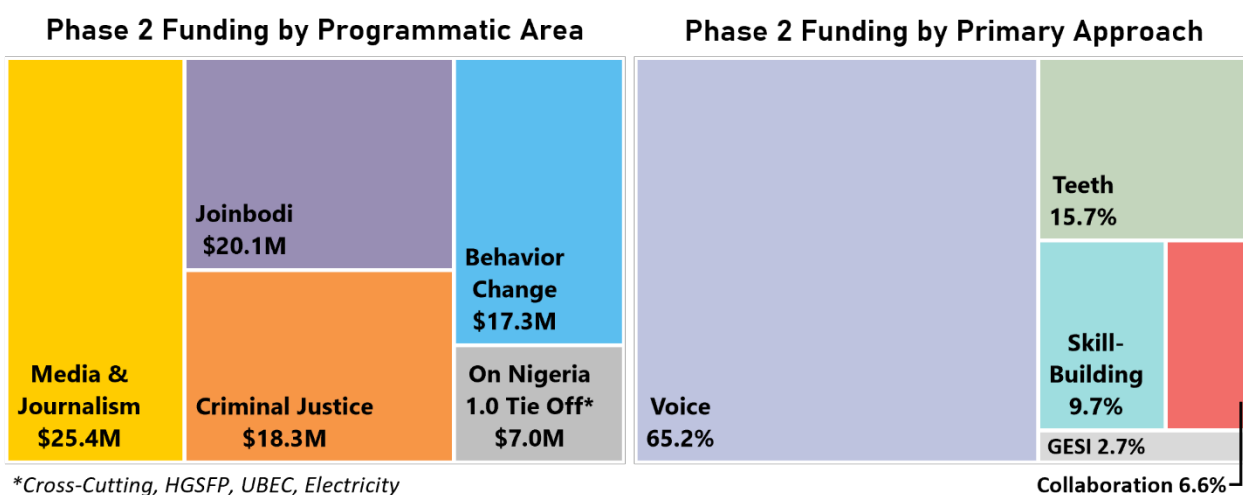


2.5. On Nigeria 2.0's Implementation

During On Nigeria's second phase, the program funded work aligned with four cohorts: Criminal Justice, Media and Journalism, Behavior Change, and Joinbodi. From April 2020 to December 2024 (2.0), On Nigeria made 201 grants totaling \$88.06 million. While the Criminal Justice and Media and Journalism cohorts continued work from the 1.0 phase with adjustments to their cohort-level theories of change based on the 2020 Strategy Review, the Behavior Change and Joinbodi cohorts built on previous cross-cutting work and learning from the Strategy Review, and formalized new cohort theories of change.

The 201 grants during On Nigeria's 2.0 phase were made to 108 organizations, two-thirds of which were first-time MacArthur Foundation grantees. Just over three-quarters of the grants (86) representing 80 percent of awarded funds were made to Nigeria-based organizations, with the remainder going to a mix of non-Nigerian implementers, researchers, and technical assistance providers. Exhibit 3 below summarizes this grantmaking, showing the breakdown of grant funding by programmatic area; in addition to the four primary cohorts, the Foundation also made a small number of tie-off grants to On Nigeria 1.0 grantees working in the electricity and education cohorts to help them wind down those projects. The exhibit also shows grant funding by primary approach based on the strategy's conceptual framework (Section 2.3). Almost all grants applied multiple approaches.

Exhibit 3. Breakdown of On Nigeria 2.0 Funding



On Nigeria 2.0 Cohort Updates

Behavior Change Grantees sought to use behavioral-insight approaches to shift social norms and encourage citizens, communities, faith actors and influences in Nigeria to reject corruption and hold power to account.

Joinbodi The Pidgin term meaning "solidarity" or "working together," Joinbodi grantees knit together a network of organizations to promote policy implementation, mobilize communities, and leverage media to demand accountability.

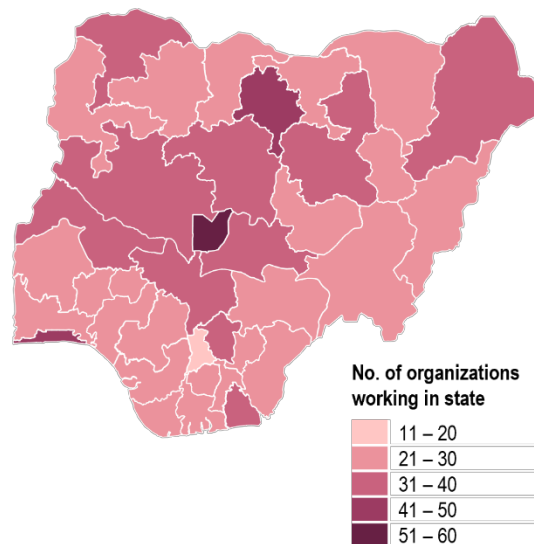
Criminal Justice grantees focused on reducing delays, improving case management, enhancing legal processes, and supporting accountability mechanisms that make prosecutions of corruption and other serious crimes more efficient and equitable.

Media & Journalism Media organizations and journalists working to strengthen independent, investigative and data-driven journalism to expose corruption and amplify anticorruption success stories.

Finally, Exhibit 4 shows the states where On Nigeria grantees and their partners worked, based on endline SNA data, demonstrating that while much work was concentrated in the Federal Capital Territory (FCT), the portfolio had broad geographic reach in every corner of the country. Much of the work occurring in FCT, meanwhile, was Federal in its nature and sought nationwide impact.

Throughout both phases of On Nigeria, the Foundation has conducted non-grantmaking activities. These include technical assistance opportunities for grantees to build monitoring and evaluation skills, training in communication and behavior change methods by experienced practitioners, and the MacArthur Foundation staff's support and mentorship in proposal development and grant management. One of the key non-grantmaking approaches is fostering collaboration among grantees by using the "cohort approach". These tactics are discussed extensively in findings below related to the Foundation's "grantcraft". Lastly, the MacArthur Foundation carries out activities to foster collaboration with other donors and stakeholders in the anticorruption space; independently raise the profile of transparency, accountability, and corruption issues ("voice"); and advocate to government and private-sector actors for further "teeth" measures.

Exhibit 4. States where Endline Network Analysis Actors Work



3. Evaluation and Learning Approach

3.1. Evaluation Questions

The final evaluation questions for On Nigeria 2.0 were developed in consultation with the On Nigeria program team and grantees in the summer and autumn of 2024. The questions fall into two categories, presented below.

Exhibit 5. Evaluation Questions

Questions to Assess Results & On Nigeria 2.0's Contribution	Questions to Understand On Nigeria 2.0's Legacy
1. To what extent, and in what ways (expected and unexpected), did On Nigeria 2.0 contribute to broadening, deepening, and strengthening a diverse, robust, and self-sustaining accountability ecosystem in Nigeria?	4. To what extent has On Nigeria contributed to sustainable improvements in the human and financial resources needed for organizations to continue accountability work beyond 2024, and how durable are any observed changes in accountability norms and systems?
2. To what extent, and in what ways (expected and unexpected), have On Nigeria 2.0's efforts contributed to the systems and actions to prevent and prosecute corruption, and individual actors' rejection of corruption?	5. What still needs to be done to further strengthen the accountability ecosystem, and build on efforts to improve transparency, participation, and accountability in Nigeria?
3. To what extent, and in what ways, has On Nigeria 2.0 laid the foundations for ongoing and future efforts to improve transparency, participation, and accountability in Nigeria?	6. What are the transferrable lessons from On Nigeria?

3.2. Guiding Principles

Three guiding principles informed the design and implementation of the final evaluation:

1. **Systems Lens:** On Nigeria 2.0 was implemented in an exceptionally dynamic and complex environment. The final evaluation therefore sought to explore whether, and how, the program operated and interacted with contextual factors to contribute to outcomes, mitigate backsliding, and unpack the specific ways in which observed outcomes emerged.³
2. **Inclusive Rigor:** Nigerian partners and colleagues have played key roles throughout the evaluation process, both on the evaluation team and in the creation, refinement, and finalization of the design, emerging findings, and conclusions. At the same time, the evaluation is focused on generating actionable insights that anticorruption advocates in Nigeria and other anticorruption champions will be able to use in their work.⁴
3. **Appreciative Inquiry:** Consistent with the strengths-based approach taken in the evaluation of On Nigeria 1.0, the final evaluation sought to generate data and evidence on what worked well, to help evaluation stakeholders—On Nigeria grantees, other actors in the accountability ecosystem, and a broader audience of anticorruption and social accountability advocates, including beyond Nigeria—use collected insights to co-

³https://www.betterevaluation.org/sites/default/files/CDIPP8_Assessing_Impact_in_Dynamic_and_Complex_Environments_Systemic_Action_Research_and_Participatory_Systemic_Inquiry.pdf (Burns 2014)

⁴ <https://www.ids.ac.uk/opinions/our-collective-path-the-inclusive-rigour-co-lab-story/>

create a collectively owned roadmap for achieving a better future. At the same time, the evaluation also highlights what did not work and explains shortcomings, so that anticorruption actors might avoid similar mistakes in future work.⁵

3.3. Methods

In the second half of 2024 and early 2025, the EL Partner worked closely with the Foundation's Evaluation Office, the On Nigeria Program Team, and grantees to develop the guiding questions and design for the final evaluation. The EL Partner and the Program Team also constituted a Reference Group, composed of eight Nigeria-based governance and anticorruption experts (including four On Nigeria grantees), to provide guidance at key steps in the evaluation process.

The final evaluation leveraged four distinct methods: 1) social network analysis, 2) case studies, 3) literature review, and 4) Delphi technique to collect and analyze data. Summary information on each of these methods is presented below; for additional detail, consult Annex 1.

#1. Social Network Analysis



The social network analysis (SNA) endline built on the 2021/22 baseline network study. The dataset for the endline consisted of 49 (of 63) survey responses from On Nigeria grantees, 26 (of 45) survey responses from non-grantees identified by On Nigeria stakeholders as partners, and six focus group discussions (FGDs) (four with grantees, and two with non-grantees). The EL Partner used the R programming language to code and analyze quantitative data and calculate network statistics, and coded and analyzed qualitative data in CoLoop.ai.

#2. Case Studies



The EL Partner explored a total of 15 case studies (nine completed in 2023 and 2024, six completed in 2025). Cases were strategically selected in partnership with the Program Team and On Nigeria grantees to reflect the breadth and depth of the On Nigeria TOC and programming, including at cohort level. The EL Partner collected and reviewed 78 documents related to the six new cases, including media reports and information produced by actors not directly involved with On Nigeria. The team also conducted 55 key informant interviews (KIIs), and distributed a survey to nearly 500 individuals that might plausibly have been affected by On Nigeria, receiving a total of 143 complete responses. Data was cleaned, coded, and analyzed in Dedoose, CoLoop.ai, R, and MS Excel, and each case was scored against a custom Response, Responsiveness, and Responsive Accountability Rubric to assess whether and how the work supported by On Nigeria contributed to changes in citizen engagement and/or government responsiveness (Annex 4).

#3. Literature Review



The Literature Review involved: 1) program-focused reporting, which examined On Nigeria 2.0 grantees' work and 2) context-focused literature, which explored the broader landscape of corruption and social accountability in Nigeria during and prior to the programming period.

- *Program-focused reporting:* the EL Partner worked with the Program Team and grantees, while also conducting targeted internet searches and consulting theLoop,

⁵ Preskill, H. and Catsambas, A. (2006). *Reframing evaluation through appreciative inquiry*. SAGE Publications.

the MacArthur Foundation's internal grant management and reporting system, to collect a total of 488 proposals, reports, and other documents.

- *Context-focused literature:* The EL Partner worked with the Program Team to co-create a list of relevant websites to search for literature that could provide texture for contextualizing On Nigeria's programming. The Program Team and Reference Group both shared additional documents for review, and the EL Partner also conducted keyword searches via Google and the United States Agency for International Development's (USAID) Development Experience Clearinghouse. 133 documents ultimately featured in the context-focused literature review.

Analysis of all documents was conducted using a combination of ALLyze and manual coding.

#4. Delphi Technique



With support from the Program Team, the EL Partner used a set of predetermined criteria to identify and select twelve Nigeria experts to constitute a Delphi panel.

Additional details on the makeup of the panel can be found in Annex 2. Panelists responded to a survey, in which they were asked to rate their level of agreement with sixteen statements about the status of—broadly speaking—transparency, participation, and accountability in Nigeria. For each statement, panelists assessed their level of confidence in their agreement rating and explained their answer. EL Partner team members used R and qualitative thematic coding to analyze and synthesize the first round of responses, prepared a summary of the group consensus for each statement, and sent the summary back to panelists, who then reviewed and updated their answers. The EL Partner then developed a final synthesis of responses and themes to capture the expert consensus on each statement.

Data Integration and Synthesis

In June and July 2025, The EL Partner team held a series of internal workshops, reviewing and integrating the themes, patterns, and emerging findings from the four methods described above, alongside the themes and findings from [learning products produced 2020-24](#), to:

1. Apply the evaluation's portfolio-level rubrics to assess whether, how, and to what extent On Nigeria 2.0 contributed to 1) the emergence of desired outcomes, and 2) mitigating backsliding
2. Assess key contextual factors that facilitated or hindered progress
3. Identify and unpack the mechanisms through which observed outcomes emerged
4. Develop preliminary findings & conclusions to answer the final evaluation questions

Participatory Sensemaking and Beyond

The EL Partner held preliminary validation sessions first with the Reference Group, then later with the Program Team to refine the findings and conclusions. Next the EL Partner, Evaluation Office, and Program Team held an in-person participatory sensemaking session with On Nigeria grantees and other ecosystem actors in Abuja, during which the findings and conclusions were introduced and together the group co-created priorities to guide future actions in Nigeria and elsewhere. These priorities took the current context into consideration, including the unprecedented closure of USAID and the ramifications it may have on Nigeria's accountability ecosystem.

Portfolio-Level Rubrics and Assessment against 2020 Baseline

Drawing on and adapting existing literature and recent frameworks for assessing the strength and effectiveness of social accountability and anticorruption initiatives, the EL Partner worked with the Program Team and the Reference Group to co-create a set of portfolio-level rubrics to assess progress toward On Nigeria's desired outcomes, and deterring backsliding, since 2020.

Each rubric aligns with one of the three levels of the On Nigeria 2.0 TOC: 1) Accountability Ecosystem, or Trunk; 2) Prevention, Prosecution, and Rejection, or Branches; and 3) Transparency, Participation, and Accountability, or Foliage), and features variables related to desired outcomes. The middle column of each row in the rubrics describes the 2020 baseline for each variable, and change was assessed relative to that baseline. The EL Partner used the evidence from the evaluation to score each variable on a scale from -2 (Considerable decline with no On Nigeria mitigation) to 0 (No change relative to 2020, with On Nigeria contributing to observed steady state) to +2 (Strong gains with On Nigeria contribution). For reference, the detailed rubrics, scores, and 2020 baseline assessments can be found in Annex 5.

3.4. Ethics

The EL Partner developed and shared an Informed Consent Form for each data collection event with all evaluation participants. For FGDs and KIs, participants were given additional opportunity to ask questions at the start of the data collection event. Case study KIs were conducted by a team of data collectors whose training included evaluation and interview ethics. Audio recordings of interviews were taken when respondents consented. The EL Partner only engaged participants over the age of 18.

The data collection instruments primarily focused on organizations, activities, and in some cases the views of participants pertaining to corruption broadly rather than personal experiences or beliefs that could cause participants discomfort or harm. Finally, the EL Partner shared both the methods and the findings and conclusions with the Foundation's program team and the Reference Group throughout the course of evaluation in order to ensure that all materials were appropriate for context and intended use, and that findings and conclusions are representative of the data and the On Nigeria program.

All surveys were designed to minimize collection of any personally identifying information, and any personally identifying information was removed from FGD and KI transcripts by members of the EL Partner. All data was saved to a secure project SharePoint site accessible only to the EL Partner, and analysis platforms required secure logins to access. Whenever possible and appropriate, data is reported in the aggregate, without names.

3.5. Strengths and Limitations

This evaluation used collaborative and participatory approaches to generate findings and conclusions that would be most useful to the Foundation, its grantees and other ecosystem actors, donors, and other social accountability practitioners in and outside Nigeria. Through convening a Reference Group during the early stages of the evaluation, the EL Partner was able to validate the design and incorporate local expertise during the implementation of the methods. In addition, participatory validation and sensemaking sessions were invaluable in ensuring the validity and resonance of the findings and conclusions, incorporating local knowledge, and ensuring the outputs of the evaluation would be practical and beneficial.

Working with local data collectors also helped foster trust and comfort among participants during data collection, and in one case allowed for local language to be used, ensuring a key participant was reached. Finally, the use of multiple, varied methods allowed the EL Partner to tell both the broad and deep story of On Nigeria, and to triangulate data.

Data collection, sampling, and analysis for this evaluation were designed to maximize evaluation rigor within the time and resources allocated. However, several limitations are worth mentioning, as they affect how readers should interpret and understand evaluation results:

- **Response bias:** 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. In addition, grantee respondents may have had a tendency to emphasize successes and minimize challenges. The relatively low response rate (~28 percent) on the cross-case survey also raises the risk of non-response bias, as people less connected to On Nigeria may have been less likely to complete the survey. The evaluation team sought to minimize this risk by cross-referencing evidence from the survey with other data streams before developing any findings.
- **Recall bias:** This evaluation often asked participants to recall and compare current context and state of corruption back to 2020. There is a possibility of recall bias where the respondents may not remember previous events or experiences, or omit details. Recent events can also change perspectives of the past. The use of multiple data streams in the evaluation helps minimize the effects of recall bias.
- **Technology and language:** Any data collection with beneficiaries or participants of grantee programming required internet connection or cellular data, potentially limiting the pool of participants. In addition, with only one exception, KIIs and FGDs were conducted in English, which may limit the pool of participants or lose nuance and subtlety expressed in some responses. Finally, while the cross-case survey was translated into several languages, only a limited number of the many languages spoken in Nigeria could be included.
- **Social accountability measurement challenges:** Measuring social accountability and anticorruption is notoriously difficult, with many indices that seek to do so criticized for validity concerns, noisiness, and lack of accuracy. These measurements, and assessing change over time, are especially hard in the absence of specific baseline data. As described above, the EL Partner used a consultative process to co-construct rubrics with which to retroactively identify a 2020 baseline, assess progress and declines relative to that baseline, and determine confidence levels for each rubric score. Though this approach helped to capture complexity and nuance, created a common evaluative framework, and supported the applicability of the rubrics to diverse evidence across the On Nigeria portfolio, the use of rubrics is fundamentally a subjective enterprise. The interpretation of the rubric categories and levels of change, and selection of ratings, may therefore reflect bias on the part of evaluation stakeholders. While applicable across the diverse contexts throughout Nigeria, some level of subjectivity remains in the interpretation of the rubrics and application of ratings.

4. How the Landscape and Context Influenced On Nigeria 2.0

Conclusion 1: The Nigerian context offered both opportunities and challenges for On Nigeria's work.

The COVID-19 pandemic and its associated effects on the economy, a changing social media and technology landscape, shrinking civic space, growing social protest movements, elections, and turnover among key anticorruption actors shaped the landscape in which On Nigeria operated. Overall, the window of opportunity for On Nigeria's work was open, but small, and evolved during 2.0.

Finding 1: The proliferation of social media and other technology, combined with issue-specific protest movements, has fueled a surge in civic participation, particularly among youth, and provided openings for the work of grantees and their partners to gain traction.

The rapid growth of social media and other technologies in Nigeria since 2020 has created new avenues for civic engagement and accountability work, particularly during catalytic moments of social change. According to Statista, in 2025, around 107 million Nigerians have internet access, up from 71 million in 2020 and 56 million in 2018⁶, and over 79 percent of internet traffic comes from mobile devices.⁷ The number of social media users in Nigeria continues to climb, from 33 million active users in 2021 to 38.7 million in 2025. This represents a huge increase over the last two decades. For example, Facebook had about 11.23 million users in Nigeria in 2010, and an estimated 29.4 million in 2021.⁸ The most used social media platforms are WhatsApp and Facebook, followed by TikTok, Instagram, and Telegram.⁹ These platforms have become sources for news, with 65 percent of online news users obtaining news from Facebook, and around half relying on WhatsApp, YouTube, and X.¹⁰

Social movements have reinforced these dynamics. Delphi panelists and a Civic Hive fellow highlighted the role of women and youth-led movements such as *Bring Back Our Girls* and *#EndSARS*. These movements showcased the power of collective action and the potential for large-scale change outside of traditional leadership structures, particularly among young people. The *#EndSARS* movement, in particular, created space for collaboration between youth, non-governmental organizations (NGOs), and government institutions for a multitude of aims, including police reform and corruption. Both movements utilized social media, and in the case of *#EndSARS* were able to motivate protests outside Nigeria by the diaspora.¹¹ However, the *#EndSARS* protest movement also brought to light ongoing challenges to the civic space, through infractions on protestors' civil liberties and several protestors killed at Lekki tollgate and throughout the protests, connecting to broader trends of closing civic space described in [Finding 3](#). Analyses from the literature review argued that motivating young people in Nigeria is key, given that young people are the largest demographic in the country.¹²

While On Nigeria's strategy recognized youth as a key demographic from a social inclusion standpoint, youth have traditionally been excluded from Nigerian power structures. The

⁶Data prior to 2018 isn't available. Doris Dokua Sasu (2024). Number of internet users in Nigeria from 2018 to 2022

⁷ Doris Dokua Sasu (2025). Internet usage in Nigeria—statistics & facts

⁸ Doris Dokua Sasu (2023). Number of Facebook users in Nigeria from 2017 to 2026.

⁹ Doris Dokua Sasu (2025). Most used social media platforms in Nigeria in the 3rd quarter of 2024

¹⁰ Tolulope Adeyemo (2025)

¹¹ Akindare Lewis (2021)

¹² Akindare Lewis (2021)

combination of technological, social media, and youth protests created new windows of opportunity for accountability ecosystem actors during On Nigeria's 2.0 stage. More broadly, data from across case studies, survey results, and grantee reporting show that harnessing this increased use of social media and other digital technologies can—when complemented by coordinated advocacy efforts, media amplification, and the presence of institutional mechanisms capable of converting public pressure into action—create windows of opportunity for relatively quick, modest improvements in organized civil society participation and government responsiveness.

Delphi panelists highlighted the emerging intersections between youth and technology, emphasizing that young people increasingly rely on social media and civic technology to access information, exchange ideas, and demand accountability, and explaining that these tools have provided openings for On Nigeria grantees and other ecosystem actors to amplify their messaging and engage broader audiences. These trends are beginning to show, if modestly, in the broader civic engagement landscape: Afrobarometer results show that, in 2015—prior to On Nigeria—84% of Nigerians reported that they had not, and would never, contact a political party official. By 2025, that had declined to 73.8%; still a large percentage, but nevertheless a notable decrease, suggesting that a substantial portion of Nigerians are now more willing to engage in the work of democracy.¹³

Finding 2: Frequent turnover and leadership changes in government and among ecosystem actors, institutional independence, and fluctuations in political will often disrupted anticorruption advocates' efforts to build enduring collaborations with government and each other.

As reported in the Learning Brief: Criminal Justice, leadership changes in government and turnover in criminal justice personnel disrupted continuity and undermined capacity building efforts when grantee-trained personnel were replaced.¹⁴ Grantees noted that frequent leadership change in key ministries disrupts policy continuity and stalls the implementation of joint initiatives. For example, Women Radio respondents shared that a representative of the Ministry of Women's Affairs with whom they had been engaging was replaced mid-discussion, meaning they had to then start over again with a new contact.

This is not only an issue in the public sector, as civil society organizations (CSOs) also face issues with turnover. According to the 2022 USAID Civil Society Organization Sustainability Index, turnover among CSOs poses a significant challenge and continues to worsen as Nigerians emigrate in search

"On the societal front, there are encouraging shifts, especially among young people and civic tech communities. Platforms like BudgIT, CODE (Follow the Money), and Yiaga Africa—all supported by the On Nigeria program—have helped institutionalize public participation in budget oversight, vote monitoring, and service delivery."

– Delphi Survey Respondent

"The democratization of the media of the space, as Citizens continue to have the space to express themselves."

– Delphi Survey Respondent

"If a new leadership comes in and is not comfortable or interested in the work that the previous leadership is doing with us it can stop it. It can truncate it and there is nothing we can do about it, so there are external factors that we cannot control in ensuring sustainability."


– Grantee KII, Learning Brief: Criminal Justice

¹³ Afrobarometer (2013) and Afrobarometer (2025)

¹⁴ https://www.macfound.org/media/article_pdfs/lb14_criminal-justice_final.pdf

of employment.¹⁵ These issues were further illustrated by Accountability Lab Nigeria's annual reports and fail faire discussions, which highlighted staff burnout and turnover as critical risks to long-term sustainability. Additionally, according to one Media and Journalism grantee's annual reports, skilled journalists often move away or get remote jobs for international media houses in exchange for higher wages.

Criminal Justice grantee documents reveal that meaningful reform within Nigeria's public service sector is also hindered by a lack of political will among public office holders. Officials often prioritize personal gain over the public good, which stymies genuine efforts to uphold the rule of law and implement policies designed to benefit society. Indeed, the apathy displayed by many leaders reveals a troubling disconnect between policy expectations and the realities of political behavior in Nigeria. Delphi panelists echoed this sentiment, noting that political will remains a barrier to institutional reforms and embedding transparency and accountability measures within government systems. Frequent political transitions and high staff turnover exacerbate these challenges by disrupting reform continuity, eroding institutional memory, and weakening trust among stakeholders. Combined with weak institutional independence and bureaucratic inefficiencies, these leadership changes stall collaboration and diminish momentum. Case study respondents added that slow responsiveness and administrative red tape further weaken partnerships and make sustained reform even harder to achieve.




"Lack of political will on the part of public office holders to give full effect to reform agendas. This is the sorry state of the Nigerian public service. Many public officials fail to walk the talk when it comes to really drilling down and delivering public good."

– CJ Grantee Document

■ **Finding 3: Closing civic space in Nigeria caused bureaucratic hurdles and fear of retaliation, while increasing insecurity hindered the ability of CSOs, journalists, and citizens to engage and demand accountability from government actors.**

According to CIVICUS Monitor, civic space refers to the ability of citizens to exercise fundamental rights and freedoms of association, peaceful assembly, and speech. When civic space is open, citizens enjoy these rights; when it is closing, their ability to safely engage in legitimate political and social activity is under threat. Delphi panelists shared that tightening civic space in Nigeria between 2020 and 2024 significantly limited the ability of journalists, activists, and CSOs to operate. The long-term trend of closing civic space in Nigeria appears in several indicators. The CIVICUS Monitor rated Nigeria's civic space as "obstructed" in 2018, but from 2019 to present has rated it as "repressed."¹⁶ Meanwhile the V-Dem's Core Civil Society Index for Nigeria also shows a decline between 2015 and 2023 (though a slight improvement appears in the 2024 data).¹⁷



"Shrinking Civic Space: Crackdowns on protests, media censorship, and restrictive NGO regulations made it more difficult for civil society to operate freely. Some journalists and activists faced intimidation or legal threats."

– Delphi Survey Respondent

¹⁵ FHI 360 and International Center for Not-for-Profit Law (ICNL) (2022)[pdf](#)

¹⁶ Civicus (2018-2024)

¹⁷ Nigeria was scored at 0.86 in 2015 at the start of On Nigeria 1.0, 0.8 in 2020 at the beginning of On Nigeria 2.0, declined to 0.76 in 2021 and 2023, and returned to a 0.84 in 2024.¹⁷ Note that fluctuations in these types of indices are common and should be interpreted with care on a year to year basis, but the indices are more useful showing long term trends. To that end, the dip that begins around 2019 is the most substantial move in this index since Nigeria's return to democracy in 2000; the trend appears in multiple year's data and aligns with other data sources showing that grantees themselves perceived a closing of the civic space in Nigeria over this period.

According to the literature review, heightened risks of harassment, legal intimidation, and physical threats have constrained opportunities for sustained collaboration, and forced many grantees to adopt discreet engagement strategies to avoid government retaliation.

The 2024 amendment to the Cybercrimes Act has further exacerbated this environment, with authorities increasingly using it to suppress dissent and punish those who expose corruption, especially on social media. For example, CSOs like BudgIT report growing concerns over staff safety and operational integrity. The cross-case survey further emphasized this point, with 16% of respondents reporting that government crackdowns, shrinking civic space, and fear of reprisals have created a climate of intimidation and distrust. Additionally, respondents reported increased government pushback on press freedom since 2020 (which has taken the form of harassment, restrictive laws, and platform bans), fostered self-censorship among journalists, and limited anticorruption reporting.

Journalists also face security risks—ranging from threats to personal safety to the growing insecurity that limits their ability to access grassroots communities and amplify their voices. Four Media and Journalism grantees noted that terrorism, banditry, and political violence placed journalists in precarious situations that threatened their safety when reporting in conflict-affected regions. Such risks restricted travel and hindered free movement, negatively affecting the breadth and depth of storytelling, while also instilling fear among journalists about potential retribution for their work. This is reflected in Africa Integrity Indicator’s data on government restraint of media and government promotion of media self-censorship, where Nigeria scored a 50 in 2015 and a 0 in 2020, indicating that the government has gone from occasionally preventing publication of information and promoting self-censorship to usually doing so.¹⁸ In addition, Reporters Without Borders’ 2025 Press Freedom Index ranks Nigeria 122 out of 180 countries, lower than in 2024 when the country was ranked at 112.¹⁹

■ **Finding 4: Economic instability and inflation, exacerbated by the COVID-19 pandemic, increased financial hardship, poverty, and operational costs, as well as contributing to brain drain. These factors created challenges for anticorruption organizations trying to sustain their efforts, but also motivated anticorruption action.**

Delphi panelists explained that economic instability and rampant inflation have negatively affected ecosystem actors’ efforts to strengthen financial resilience. This was mirrored by grantee documents, where three Media and Journalism grantees report that inflation drove up costs and reduced their ability to compensate staff and maintain their activities; the efforts of both Accountability Lab, Nigeria and Partners West Africa, Nigeria were likewise stifled by exploding costs and an inability to compensate staff, partners, and participants. According to the World Bank, inflation rose steadily from 2019, reaching a high of 33.2 percent per year in 2024.²⁰ In the Media and Journalism Synthesis Memo, Media and Journalism grantees also noted that economic conditions can contribute to brain drain, as trained journalists seek positions with international publications.²¹

“...because of the conversations around federal subsidy that affected the economy negatively. I would say, the rising fuel, transportation, food and essentials, this actually put a strain to implementation of project activities that maybe were supposed to be done out of state.”

– Grantee KII, Case Study

¹⁸ Africa Integrity Indicators (2014-2024)

¹⁹ Reporters without Boardsers (2024-2025)

²⁰ The World Bank (2024). Inflation, consumer prices (annual %)—Nigeria

²¹ [Microsoft Word—MAJ Synth Memo_FINAL](#)

Financial hardship further constrains the work of CSOs and their beneficiaries. Cross-case survey respondents identified unemployment as limiting civic participation, and many participants in accountability programs face financial precarity, which limits their ability to remain engaged without additional support. For instance, Women Radio Network members often sought financial assistance and business support beyond what the program could provide, affecting sustained participation. Limited funding also impacts the ability of media organizations to support less commercially viable topics, including women's issues.

On the other hand, Delphi panelists also noted some counterintuitive effects of economic hardship, describing how poverty has motivated some citizens to engage further, demand public services, and question the use of public funds. The Civic Hive Fellowship program illustrates how uncovering poor community conditions can galvanize local civic engagement; in the FCT, fellows' findings spurred citizens to demand improved services and greater accountability.

The combined pressures of COVID-19 and the removal of fuel subsidies exacerbated existing economic challenges. According to grantee reports and context-focused literature, the pandemic strained Nigeria's budget, diverted resources, and restricted public participation in budget processes, while also limiting grantees' ability to conduct in-person training and activities. The Foundation's GESI Landscape Analysis found that historically disadvantaged groups were disproportionately affected: as processes and programs moved online, women and those in rural areas were often left out due to limited information and communication technology access. Furthermore, women were left out of decision-making during the pandemic as these decisions often centered on economic and security issues, areas where women are already marginalized; the result was to exacerbate their exclusion from broader accountability processes just as On Nigeria was trying to broaden the diversity of the ecosystem. Grantee reports and case studies confirm that government responses to the economic crisis did little to restore stability, and did not reduce barriers for individuals attempting to increase civic participation.

"...Some of the women...80% of them [needed] financial support. We couldn't provide that to them... So what we could do is just to create a platform for them to come and talk about their services, and hopefully somebody will patronize them. And that kind of reduced the engagement because that's what they want, and we cannot help them."

– Grantee KII, Case Study

"Most importantly, if we visit some of these old original communities of inhabitants of the FCT, we will see high neglect in terms of their school buildings, in terms of access to clean water, in terms of access roads, in terms of even primary health care, you will see all of this. But with the understanding and the empowerment in terms of civic participation that we are passing across, we begin to see more community advocates now coming into place to hold the government to account in terms of providing some of these basic amenities for their communities."

– Grantee KII, Case Study

► **Finding 5: Distrust of government and—sometimes—among and between accountability ecosystem actors continues, due to enduring norms regarding impunity, the prevalence of corruption, and religious and ethnic tensions in some places.**

Changing social norms is a deeply complex process, and often takes years or even decades, progressing nonlinearly in fits and starts.²² The data from On Nigeria demonstrates this point:

²² Cheyanne Scharbatke-Church and Diana Chigas (2019)

cultural and religious norms significantly affected the efforts of CSOs to improve the diversity of the accountability ecosystem, particularly in regions like northern Nigeria. For example, participants in the Women Radio Network initiative reported during case study KILs that deeply rooted beliefs, curtailed their ability to engage communities on critical issues such as child marriage and girl child education. Additionally, according to two Media and Journalism grantee documents, gender biases and stereotypes continue to hinder the professional growth of female journalists, affecting their confidence and limiting their ability to cover important accountability-related stories.

These entrenched beliefs also affect women's participation in Nigerian society, and while Nigeria has marginally increased its overall score in the World Economic Forum's

"We also faced gender biases and stereotypes that affected the perception of female journalists and their ability to cover certain topics in their regions."

– MAJ Grantee Document

Global Gender Gap Index from 0.638 in 2015, to 0.635 in 2020, and 0.649 in 2025, it still ranks just 124th of 148 assessed countries. Nigeria's score for one component of this index, Political Empowerment, continues to struggle, with a score of 0.097 in 2015, to 0.032 in 2020, and now 0.088 in 2025.²³ Finally, distrust among and between diverse groups also impeded collaborative efforts. Al-Habibiyah Islamic Society's program documents shared how they had to overcome previous

issues with organizations being reluctant to partner with a Muslim organization, while HumAngle noted how the diversity of Nigeria can disrupt social cohesion.

The context-focused literature notes that political influence can lead to an environment where individuals see that corrupt behaviors can go unpunished, which normalizes corruption, and erodes public trust in governance, thereby undermining public officials' credibility, exacerbating a sense of impunity, and encouraging even more corruption. Concerns about the independence of watchdogs and the absence of widely trusted reporting channels for whistleblowers mean that many instances of corruption go unreported and unpunished, further entrenching a culture of impunity.²⁴

"So especially for women in northern Nigeria, it's very hard for us to talk on some sensitive issues. You know, some cases, some issues that we can talk about in the South West, like child marriage, early marriage, education of girl child was not really that easy for us to talk about [in] the North Zone, because they are very much sensitive when it comes to girl child marriage, girl child education and what have you."

– Grantee KIL, Case Study

"The implication of this oversight is that legal, policy, and institutional reforms maintain the (corrupt) structural nature of the procurement process, while demanding changes in public officials' behavior without providing the means to foster these changes. As a result of this lacuna, many of the anti-corruption reforms in Nigeria's procurement system have yielded extremely limited results."

– Brookings 2024

²³ World Economic Forum (2024)

²⁴ Sope Williams, Adedeji Adeniran, and Aloysius Uche Ordu (2023)

5. What We Learned: On Nigeria 2.0's Contributions to Results

5.1. Accountability Ecosystem

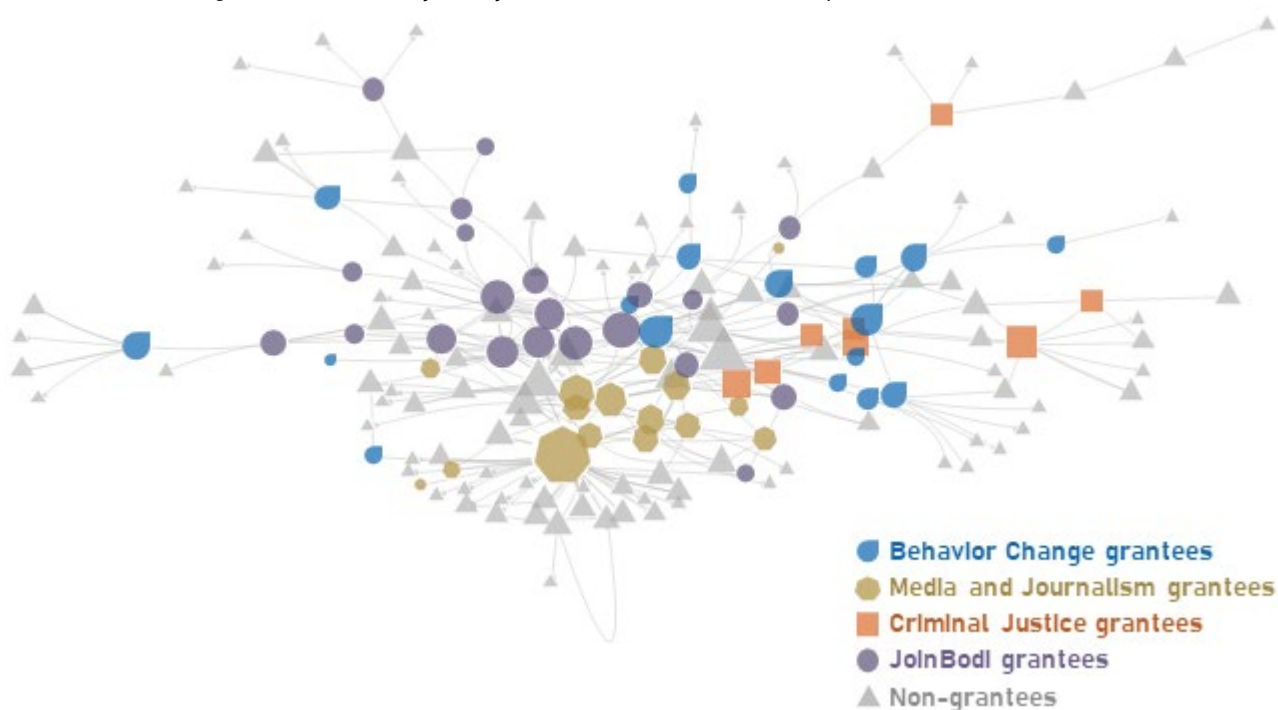
Conclusion 2: On Nigeria largely met expectations in strengthening multiple dimensions of Nigeria's accountability ecosystem, contributing to concrete progress and momentum. Progress in the accountability ecosystem's collaboration, adaptive resilience, and diversity since 2020 is most notable, with more modest improvements in ecosystem scale and institutionalization. Stronger relationships among On Nigeria grantees and their partners are well documented, but there is less evidence of increased integration of actors not directly connected to grantees or their programming.

► **Finding 6: On Nigeria's programming and support built trust, enhanced shared learning, and incentivized collective action. The cohort model was a particularly successful tactic that fostered collaboration among grantees by providing regular and structured opportunities for leveraging complementary skills and networks.**

Relative to 2020, improved collaboration among ecosystem actors is clear. Grantees and their partners have intensified actions around shared goals, coordinated efforts to reduce overlap, and deployed a range of complementary tactics to strengthen the overall effectiveness of efforts. Exhibit 6 below presents a visual depiction of the accountability ecosystem at the end of On Nigeria 2.0, from the social network analysis. The graphic reveals a densely interconnected network of accountability actors (larger nodes are more highly connected) in which On Nigeria grantees are central, but many non-grantees from both the public and private sectors are visible throughout. The overall size of the network increased by 45 organizations and 133 connections from baseline to endline. The network analysis also showed the deepening and strengthening of relationships over the course of On Nigeria 2.0. At endline, respondents rated 55 percent of all network ties (or 182 network ties) as “highly collaborative”, which entailed “frequent communication, long-term interaction, coordination, and the sharing of ideas and resources”. These 182 highly collaborative network ties nearly equal the total number of network ties in the baseline (197), suggesting that actors are now more closely connected and collaboration has strengthened.

Grantees across all cohorts reported On Nigeria's support fostered shared learning and collective action, which they felt was essential to advancing accountability work. According to grantee documents, not only did On Nigeria bring together Nigerian organizations in annual meetings and regional workshops, but the program also connected Nigerian organizations to international partners, expanding their reach and influence. These documents also show that relative to baseline grantees have created communities of practice, hubs, and committees that bring together ecosystem actors—including CSOs, community-based organizations (CBOs), law enforcement, sector professionals, and community members—to share skills, build awareness, engage in collective advocacy, and create lasting connections to support accountability efforts. For example, the CODE has set up a community of practice advocating for state adoption and proper implementation of the Disability Act, successfully advocating for adoption of the act in Yobe and Osun. Joinbodi grantees report in engaging in more formal and strategic partnerships over the course of On Nigeria, working together to review research, disseminate findings, and increase discourse on anticorruption topics.

Exhibit 6. The On Nigeria Accountability Ecosystem — Endline Network Graph



Evidence shows that collective action further deepened trust. Five case studies demonstrate that partners' common commitments enabled them to share information, develop collective goals, design complementary strategies, and work together over time to engage in action and ultimately increase reach. For example, the National Anticorruption Performance Public Reporting project, led by the Centre for Media Policy and Accountability (CMPA), brought together over 32 actors, including anticorruption agencies (such as the Economic and Financial Crimes Commission (EFCC), Independent Corrupt Practices and Other Related Offences Commission (ICPC), Code of Conduct Bureau, the Nigeria Financial Intelligence Unit, the Public Complaints Commission, Ministry of Justice, and the Technical Unit on Governance and Anti-Corruption Reforms), CSOs, media outlets, and international partners in a shared effort to promote more effective oversight of and reporting on anticorruption agency performance.

Transparency in reporting enabled these agencies to correct misconceptions about their work, leading to increased trust with journalists and the public. Nearly all grantees highlighted the importance of coalition actions for leveraging complementary skills and scaling work. According to grantee documents, the Palace of Priests Assembly's faith-based reach, Behavioural Insights Team's behavioural design expertise, and Griot Studios' creative content resulted in an effective WhatsApp campaign that mobilized church leaders to promote anticorruption messages nationwide.

Whistleblower Protections Coalition

Following a conference on whistleblowing, a group of Joinbodi grantees formed a network to advocate for and spread awareness of whistleblower protections. African Centre for Media & Information Literacy expanded this coalition to include the Presidential Initiative on Continuous Audit, a government agency, and the Whistleblower International Network. These added connections provided the group with increased resources and supported them to draft the Whistleblower Protections Bill.

On Nigeria’s cohort model (see box) was instrumental in fostering this collaboration, both among and across voice and teeth actors, as well as between grantees and partners, enabling ecosystem actors to come together in ways they may not have otherwise. This structure was complemented by participatory, collaborative strategic learning and coordination mechanisms that brought grantees and the Foundation together to reflect, learn, and adapt. These mechanisms included annual cross-cohort learning events, ad hoc convenings, and region-specific networks. For instance, the ICPC Anti-Corruption Academy of Nigeria (ICPC ACAN) fostered collaboration by partnering with other On Nigeria grantees to extend its reach and expertise. Through alliances

The cohort model was an intentional system that grouped grantees working on similar themes; key aspects of the cohort model were lead coordinators selected collaboratively, facilitated quarterly coordination meetings, and opportunities to submit joint grant applications.

“In the course of implementing this program, we were able to learn from other organizations that were better at implementing GESI, such as Step Up Nigeria [and] Akin Fadeyi Foundation... because we constituted what is called the behavior change cohort in the corpus of MacArthur grantees.”

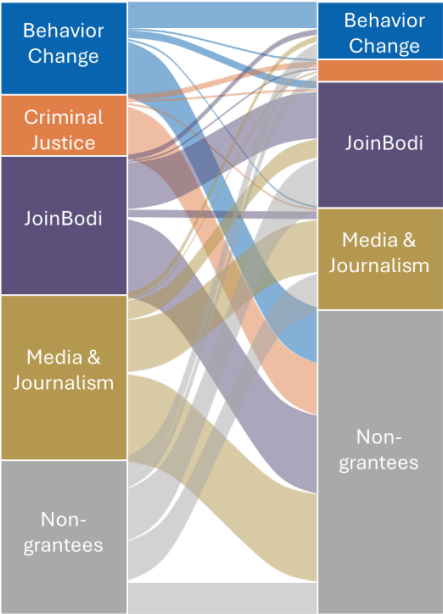
– Grantee KII, Case Study

with Al-Habibiyyah Islamic Society and Lux Terra Foundation, ICPC ACAN engaged religious and traditional leaders to promote anticorruption norms, while collaborations with Step Up Nigeria and Akin Fadeyi Foundation helped integrate GESI into its programs. These approaches enabled grantees to combine complementary skills and resources, foster trust, and share learning.

The SNA Endline Report confirms that the cohort model fostered collaboration beyond its members by creating network connections that linked organizations within and across cohorts and with non-grantee organizations through shared relationships and mutual partners. Exhibit 7 shows the collaborations within and across cohorts, as well as those with non-grantee partners. It highlights the

extensive collaboration among grantees, which many attributed to the cohort model in focus groups. It also shows the expansive collaboration On Nigeria facilitated beyond cohorts, which increased the influence of grantees within the broader anticorruption ecosystem. Each cohort also has a few organizations that serve as hubs in the On Nigeria network, connecting a large number of organizations together. Between the baseline and endline the number of these hub organizations grew and diversified to include each of the cohorts. Evidence from multiple case studies and the 2024 Grantee Perception Survey indicates that the cohort model provided structured opportunities to foster inclusive, cross-sector collaborations among grantees and their partners.²⁵ The Foundation also incentivized strong partnerships among grantees through facilitating opportunities for regular engagement and joint work through mechanisms such as X-grants, a grantmaking tool designed to support small, strategic grants on priority topics.

Exhibit 7. Grantee Collaborations within Cohorts, across Cohorts, and beyond On Nigeria Grantees



²⁵ This study was conducted by The Center for Effective Philanthropy.

Grantees reported that partnerships helped strengthen grassroots connections as well as create these networks, as reported in Learning Brief: Organizational Strengthening.²⁶ These partnerships strengthened sectoral linkages across governance, media and journalism, and faith-based actors, while regional networks improved coordination and knowledge sharing among organizations working in similar contexts or regions. For example, the Civil Society Legislative Advocacy Centre (CISLAC) works with eight sub-grantees across Nigeria's six geopolitical zones fostering dialogue between state-level actors and citizen groups and sensitizing people to the cost of corruption and priority anticorruption policy reforms. Their subgrantees reported during SNA FGDs that they are continually strengthening their connections with each other through quarterly meetings and sharing knowledge and experience.

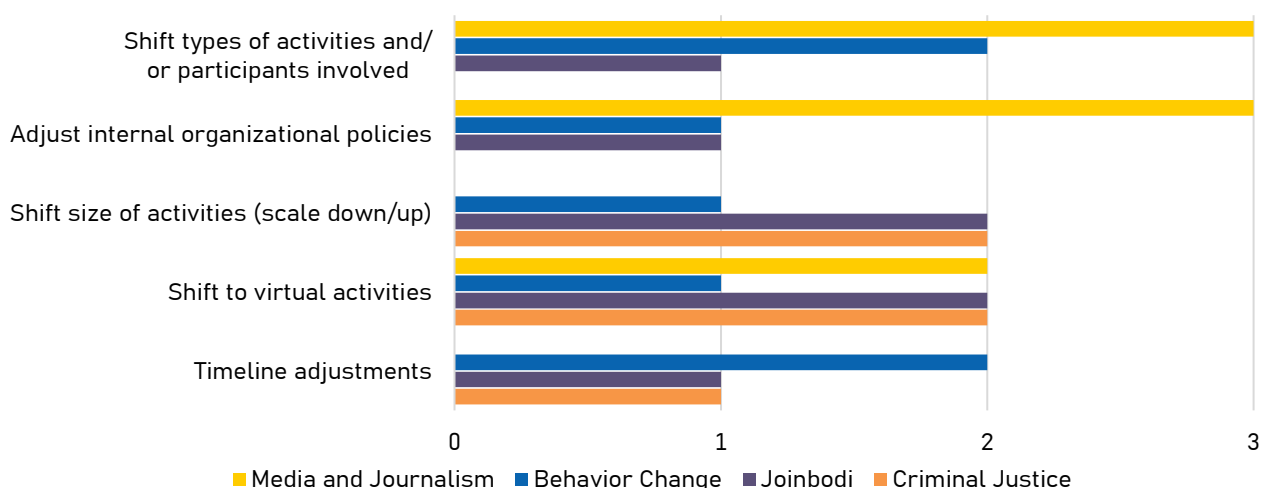
"...we have this quarterly opportunity to meet all the organizations that were under the CISLAC cohorts. So we compare notes and we share experiences and then learn from each other."

– Non-Grantee FGD, SNA

Finding 7: On Nigeria's skill-building and organizational strengthening approaches improved adaptive resilience and sustainability among ecosystem actors, both individually and collectively. Long-term funding and the Foundation's Indirect Cost Policy enabled grantees to improve capacity, innovate financially, and invest in institutional development.

On Nigeria's investments in skill-building were a part of the strategy from the start. Skill-building featured as a tactic in Foundation-funded grants, as well as through non-grant technical assistance for organizational governance and participatory monitoring, evaluation, and learning (MEL). This work strengthened the extent to which grantees were able to regularly learn and adapt to emerging data and changes in context. As reported in Learning Brief: Organizational Strengthening,²⁷ ten of 12 representatives from a sample of grantee proposals reviewed mentioned plans in place to support evidence-based programmatic adaptation to potential challenges. In their annual reports, grantees outlined a variety of strategies they used in practice to adapt to changes in political operating environments, public feedback and MEL data, and the COVID-19 pandemic, which are outlined in Exhibit 8.

Exhibit 8. Grantee Strategies to Adapt Programming to Respond to Contextual Challenges or Changes, as Explained in Annual Reports (n=12 [three grantees from each cohort])



²⁶ [on-nigeria_2.0_lb12_org-strengthening_2024.pdf](#)

²⁷ See **Finding 8:** Grantees worked strategically to adjust programming in response to changes in the political context, the COVID-19 pandemic, and emerging MEL data, including by shifting to subnational and community-level activities and leveraging virtual programming to reach larger audiences.

Grantee documents in the literature review, the SNA, and interviews for the case studies show that grantees used participatory MEL to collect and apply feedback from partners and communities, which enabled them to adapt program strategies and enhance resilience.²⁸ For example, at least four Media and Journalism grantees systematically collected feedback from partners and modified programs in response to emerging challenges, while at least five Joinbodi grantees conducted baseline surveys, scoping studies, and assessments to tailor approaches to community needs. This is corroborated by case study interviews, where Accountability Lab, Nigeria shared how they adapted over time by shifting the Integrity Icon nomination processes online to expand reach and adjusting the judging and selection process to ensure equitable

gender representation among icons and integrity hub participants. Grantee documents and case studies revealed that the Foundation's Indirect Cost Policy, which allowed grantees to allocate up to 29% of their grants to overhead, fringe, and administrative costs, enabled organizations to move beyond project execution toward financial innovation and organizational resilience. For example, organizations like Public and Private Development Centre and the Joint National Association for Persons with Disabilities invested in bonds, markets, and technology subsidiaries to create sustainable revenue streams, while others invested in institutional development and the formation of reform-minded collaborative networks. Also, organizations such as Social Action and the Resource Centre for Human Rights used indirect funding to become hubs that incubated emerging NGOs, developed multi-regional democracy centers, and supported litigation networks that amplified accountability efforts across the ecosystem.

According to the results of the 2024 Grantee Perception survey, On Nigeria's long-term funding further supported collaboration and delivered meaningful skill-building opportunities and results. Considered together the combination of long-term funding, indirect cost flexibility, and skill-building contributed to evidence-driven program design, more sustainable organizations, more collaborative efforts involving non-grantees, and more adaptive initiatives, collectively resulting in a stronger adaptive resilience of the overall accountability ecosystem.

► **Finding 8: Many On Nigeria grantees contributed to increasing the diversity of the accountability ecosystem, engaging new participants through their inclusive strategies, although more remains to be done to further engage historically marginalized groups (women, youth, persons with disabilities, and rural populations) in anticorruption initiatives.**

Grantees across all cohorts and their partners have adopted inclusive strategies to increase the engagement of historically disadvantaged groups in accountability activities, with a particular focus on women, youth, and persons with disabilities. Multiple sources indicate that grantees implemented targeted capacity-building workshops and trainings to equip these groups with the skills and tools needed to participate more effectively in governance and accountability processes. For example, grantee documents reveal that at least three Joinbodi

"The findings from the baseline report indicated that project beneficiaries were not actively involved in the process of nominating constituency projects. This lack of participation resulted in projects that did not align with the actual needs of the communities being nominated. This identified gap helped to strengthen the delivery of project activities."


– JB Grantee Document

grantees tailored workshops directly to women, youth, and persons with disabilities, whereas the Daily Trust Foundation trained 193 underrepresented journalists from over 40 organizations in Kano, Calabar, and Ilorin, to amplify the voices of marginalized populations in the media.

Other grantees engaged in targeted outreach: a Joinbodi grantee, as revealed in the SNA, worked with the Independent National Electoral Commission to create gender and inclusion desks, and help ensure equitable awareness of and access to voting; Signature Development Media Foundation held events in local languages and intentionally sought out and engaged women, okada and keke riders²⁹ and road transport workers in town hall forums; and Social Action worked with local chiefs, youth groups, and women's associations across the Niger Delta to ensure that advocacy efforts reflected the priorities of historically disadvantaged communities. In addition, much of the work of criminal justice grantees that support proper implementation of the Administration of Criminal Justice Act and Laws (ACJA/Ls) throughout the country serves to support and improve outcomes for indigent citizens, women, and those without knowledge of their rights within the system. This work includes raising awareness in local languages, providing duty solicitors in police stations ready to support and serve indigent people, and supporting criminal justice actors in understanding the ACJA/Ls and how to properly implement them.


These strategies were often effective, leading to the expansion of the accountability ecosystem in ways specific to Nigeria, and fostering the creation of new relationships between diverse sets of new ecosystem actors, from informal norm carriers, such as imams, the Knifar Women (a group of women in the North East who are collaborators as well as beneficiaries of a grantee), to private sector, media actors and grassroots communities

Despite these gains, inclusion remains a work in progress. The context-focused literature review and Learning Brief: GESI Strategy and Implementation³⁰ confirmed continued barriers faced by youth, including literacy, language, and skill gaps, which remain consistent with baseline conditions, despite some targeted grantee efforts. Stereotypes and stigma continue to hinder grantees' efforts to integrate GESI, limiting the participation of some groups. For example, several grantees noted that women often hesitated to speak in mixed-gender meetings due to fear or to male dominance in discussions. Results from the Delphi Panel and SNA suggest that more intentional efforts are still needed to broaden and deepen the engagement of persons with disabilities and rural populations. Though one third of organizations in the On Nigeria-centered network are woman-led or have a GESI focus (shown in teal in Exhibit 9), many of these are peripheral to the network, meaning they do not collaborate with many other organizations in the network.



"The project provided working tools to the department and then supported the retreat of gender and disability desk officers across the country to understand their roles, responsibilities and also to develop action point on the policies and administrative changes that are required for them to deliver on the objective. In doing that, of course, we had to bring on board the disability community. And so at the center of the conversation was the Joint Association of Persons with Disability...we had other partners...The Inclusive Friends Association and TAF Africa, CDC Foundation Data Lead and a host of others served as disability inclusion experts."

– JB Grantee FGD, SNA

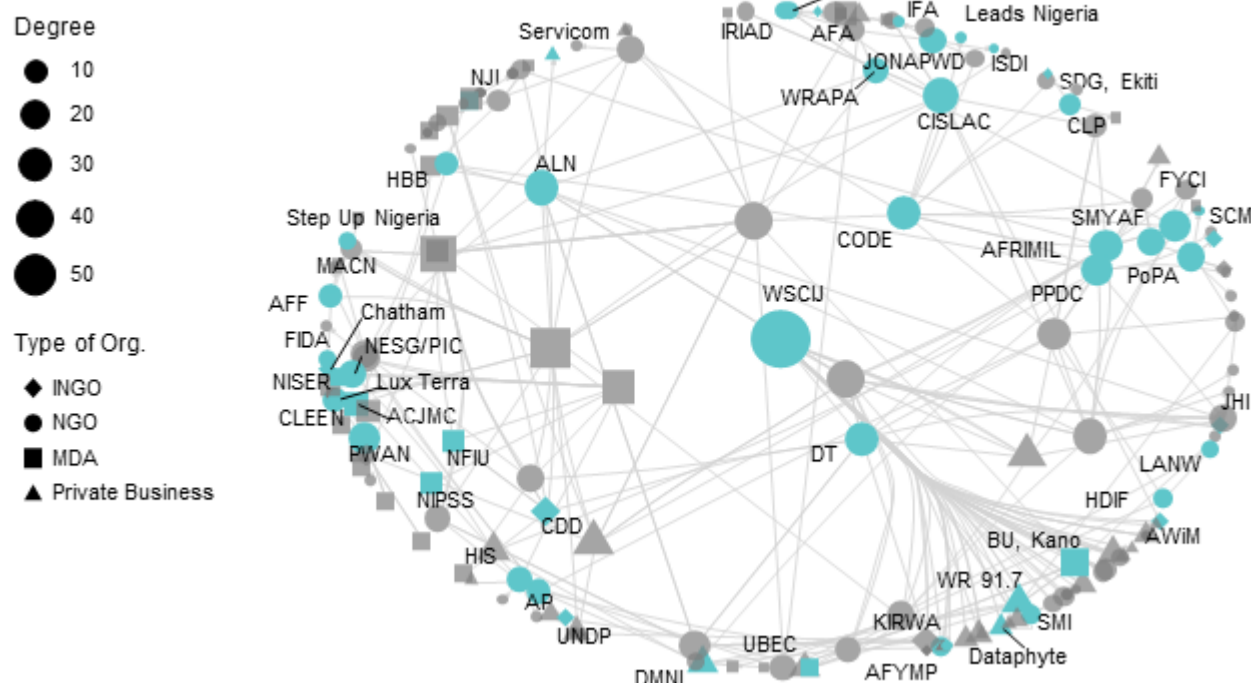


²⁹ Okada riders: In Nigeria, an *okada* is a commercial motorcycle used to transport passengers, particularly in areas with heavy traffic or poor road conditions. An *okada rider* is, therefore, a motorcycle taxi operator. Keke riders: A *keke* (short for *keke napep*) is a three-wheeled motorized taxi similar to a tuk-tuk or auto rickshaw. A *keke rider* is the driver of this vehicle, typically transporting passengers over short distances.

³⁰ https://www.macfound.org/media/article_pdfs/on-nigeria_2.0_lb7_gesi_final.pdf See Finding 6 and 8.

Exhibit 9. GESI-Related Organizations in the On Nigeria Accountability Network

GESI-Related Organizations



Further, grantees and ecosystem actors vary widely in the extent and depth of their GESI engagement. Evidence from two previous EL products shows that while On Nigeria grantees in all cohorts report interest in applying a GESI lens to their anticorruption work, they found that doing so was challenging due to resource constraints and a lack of tools and know-how. Though On Nigeria helped to address some of these gaps, including by developing and disseminating a GESI integration tool to grantees, one non-grantee partner noted during FGDs that lack of awareness or understanding of the issues historically marginalized people face continues to be a challenge. As Learning Brief: GESI Strategy and Implementation concluded, “On Nigeria programming is contributing to emerging changes in the accountability ecosystem that matter for historically disadvantaged groups, but these changes are not yet widespread. Grantees and ecosystem actors have more to do to sustain, consolidate, and scale their GESI work in the future.”³¹

Finally, grantees used innovative approaches to engage new audiences in accountability work. For example, Case Study: Citizen Engagement & Action explains how tools like Tracka and Follow the Money enabled communities to monitor government spending and interpret public budgets, especially during the COVID-19 pandemic. While the financial and budgetary data were already in the public domain, these platforms made the information accessible and interpretable to everyday citizens, thereby enabling broader participation in fiscal oversight across multiple geographies.³² Other innovations include the use of creative, narrative-based approaches to foster positive examples of integrity and reframe the public discourse around corruption. Organizations such as Accountability Lab, Nigeria have led this shift through initiatives like the Integrity Icon campaign, which celebrates honest public servants and “names and fames” ethical behavior rather than punishing misconduct.

³¹ [https://www.macfound.org/media/article_pdfs/on-nigeria_2.0_lb_media-monitoring-\(2016-2023\)_final.pdf](https://www.macfound.org/media/article_pdfs/on-nigeria_2.0_lb_media-monitoring-(2016-2023)_final.pdf)

³² [cs-2_citizen-engagement-and-action_2024.pdf](#)

Case studies indicate that since 2020, such initiatives have shown promise in scaling horizontally, across geographies, engaging a diverse range of government actors in many states through workshops, knowledge sharing, and capacity building efforts. There were very few examples in either the program-focused literature or case studies of vertical scaling, however, meaning initiatives are not consistently reaching senior federal officials.

5.2. Prevention, Prosecution, and Rejection of Corruption

Conclusion 3: On Nigeria largely met expectations of momentum and signs of progress in advancing the prevention, prosecution, and rejection of corruption. While progress was not always broad and deep, all states now have ACJ/Ls, and most have Administration of Criminal Justice Monitoring Committees (ACJMCs), with gains in court efficiency and performance emerging in some states. ACAs have improved some dimensions of their performance, even though there are ongoing concerns about their overall effectiveness and credibility. Grantee efforts have contributed improved public awareness of corruption and anticorruption through better media coverage, public officials' stronger knowledge and anticorruption skills, and more religious leaders speaking against corruption and modelling integrity for their congregations.

■ **Finding 9: On Nigeria grantees and their partners across cohorts have had success in improving the accountability ecosystem's ability to prevent, prosecute, and reject corruption by 1) building skills and supporting tools for organizations and individuals involved in anticorruption work and 2) emphasizing collaboration and coordination among ecosystem actors.**

Skill-building and support tools: Internal grantee documents and previous EL products reveal a suite of skill-building approaches that organizations implemented to improve accountability ecosystem actors' ability to investigate and prosecute corruption and other criminal violations.³³ Targeted actors include legal system practitioners, journalists, media organizations, and public servants, among others. See box for detailed examples.

Criminal Justice grantees developed numerous implementation resources to support the efficient application of justice and thus prosecuting corruption. These resources included manuals, guides, and Practice Directives (sets of "how-to" steps) that translate complex legal frameworks into accessible guidance. Grantees also developed technological solutions, such as court monitoring initiatives and digital platforms (e.g., [UWAZI](#)) that have enabled justice actors to track procedural compliance and improve case management of the legal system. These resources contributed to measurable improvements, for example, a majority of respondents for an internal assessment by the International Federation of

Skill-Building Approaches

Training and workshops: Akin Fadeyi Foundation (AFF) trained staff from the National Agency for the Prohibition of Trafficking in Persons on using the FlagIt app; CSLS collaborated with the Nigerian Institute of Advanced Legal Studies (NIALS) on capacity building workshop for Appellate Court Justices

Training-of-trainer (TOT) programs: Partners West Africa Nigeria's (PWAN) training of the Bauchi Police Command; NIALS conducted a TOT on Applying the Guidebook on Integrating ACJA 2015

E-learning platforms: LEDAP helped train the EFCC through the EFCC Academy learning platform; LEDAP and the Nigeria Bar Association implemented the Institute of Continuing Legal Education (ICLE)

³³ https://www.macfound.org/media/article_pdfs/lb14_criminal-justice_final.pdf

Women Lawyers (FIDA) reported that the use of Practice Directives led to faster dispensation of justice.

Annual reports reveal that grantees believe that these approaches effectively equipped judges, prosecutors, police, anticorruption agencies, and civil society actors with a deeper understanding of the ACJA/L and the tools to prevent, prosecute, and reject corruption. Approximately 75% of cross-case survey respondents report that lawyers are slightly or moderately effective when it comes to prosecuting instances of corruption.

Findings from internal documents and previous EL products³⁴ demonstrate that Media and Journalism Grantees similarly invested in building partners' skills. Media and Journalism grantees' skill building focused on non-grantee media organizations and others to conduct investigative reporting, so that Nigerians across sectors, geographies, and ethnicities are exposed to media coverage of the harmful effects of corruption. On Nigeria's TOC links increasing exposure to awareness-raising, which it considers key to Nigerian citizens rejecting corruption. See box for details of Media and Journalism grantees activities.

Collaboration & coordination: Grantees also leveraged multi-stakeholder coordination to support the implementation of the ACJA/L through the creation of ACJMCs (or their equivalents).³⁵ In Gombe State, for example, one of the last states to adopt the ACJA, PWAN led efforts that brought together the Chief Justice, Ministry of Justice, police, Legal Aid Council, FIDA, Correctional Service, and other stakeholders to support the inauguration of the State ACJMC. Evidence from case studies revealed that this coordinated approach not only facilitated the adoption of critical legislation for the prevention of corruption but also laid the groundwork for improved implementation and oversight mechanisms.³⁶

Grantee documents and case studies indicate that grantees worked across institutional boundaries to support the investigation and prosecution of corruption and other criminal violations. Collaborative efforts helped ensure that the provisions of the ACJA/L continue to advance through improved knowledge, shared ownership, and sustained implementation, in addition to leveraging partner networks, and sharing resources. For example, FIDA institutionalized several interventions by embedding developed materials into ongoing training efforts with key justice sector actors, including training partnerships with

Grantee Activities

Training: WSCIJ's House-to-House Investigative Journalism Desk Initiative

Journalism and fellowship programs: Cable Newspaper Journalism Foundation's graduate internship program

Conferences: WAMAC and partners organized the First International Conference on Communication, Media, Insecurity, and Development

Mentorship: Media Development Investment Fund's (MDIF) Nigeria Media Innovation Program

"I can reiterate the fact that it was obvious at the end of the day that without that support, without the coordination that ACJMC provided, without the platform that the whole project of the MacArthur Cohort Group members provided... there was no way we could have engendered such understanding to raising the level of awareness of these people to be able to fully participate in all these projects. I think the collaborative effort contributed to an extremely significant level."

— Grantee KII, Case Study

³⁴ https://www.macfound.org/media/article_pdfs/maj-synth.-memo_final.pdf

³⁵ CSLS and other civil society organizations (CSOs) involved in the criminal justice sector have identified four core elements of the ACJA system, Known as The National Minimum Standards, include Section 496: Creation of ACJMCs; Section 396: Provision of time frame for trials/case management/ limitations on number and duration of adjournment; Section 106: Requirement that crimes be handled by legally trained personnel; and Section 306: Prohibiting stay of trial proceedings on account of interlocutory appeal

³⁶ https://www.macfound.org/media/article_pdfs/cs_collab-stories_final.pdf

the National Judicial Institute for judicial and support staff, the Nigeria Bar Association for legal practitioners, and various law enforcement agencies. In another example, Partners West African, Nigeria (PWAN) and the Nigeria Bar Association collaborated with the Legal Aid Council to leverage each other's networks and relationships to gain buy-in from police to implement the Police Duty Solicitors Scheme, improving access to legal protections and services and reduce pretrial detention in the FCT.

■ **Finding 10: On Nigeria effectively built on the MacArthur Foundation's previous decades of work to drive reform in the prevention and prosecution of corruption. Evidence shows that the legal framework and its implementation improved during On Nigeria 2.0, with grantees contributing to all 36 states passing ACJ/Ls, many creating ACJMCs, and improving perceptions of legal system actors.**

Several achievements since 2020 indicate the improvements in the prevention and prosecution of corruption, as well as the overall strengthening of the criminal justice sector. Convictions by the EFCC increased substantially, from 126 in 2021 to 3500 convictions from October 2023–2024. The ICPC reported recovering NGN 2.71 billion (USD 1.6 million) from stolen public funds in 2021 and recovered NGN 76.750 billion (USD 47 million) in 2023.³⁷ On Nigeria had key relationships with both these anticorruption agencies (see box, right).

Legal reforms and improvements to implementation during the period of On Nigeria 2.0 strengthened the criminal justice system as a whole: assessment Data from the Centre for Socio-Legal Studies (CSLS) from 2023 to 2025 show that the average time to complete a criminal case from arraignment to judgement at the Magistrate Court level improved or stayed the same for 27 states; at the High Court level this statistic improved or stayed the same for 20 states (see Exhibit 10). In addition, according to the context-focused literature review, relative to 2020, the clearance rates for corruption cases have improved for 21 out of the 23 states for which there are data and for capital offence cases in all 27 states for which data are available. PWAN supported this effort by deploying a speech-to-text transcription solution to a Magistrate Court in the FCT. As a result, the court recorded an increase in turnover in cases being decided.

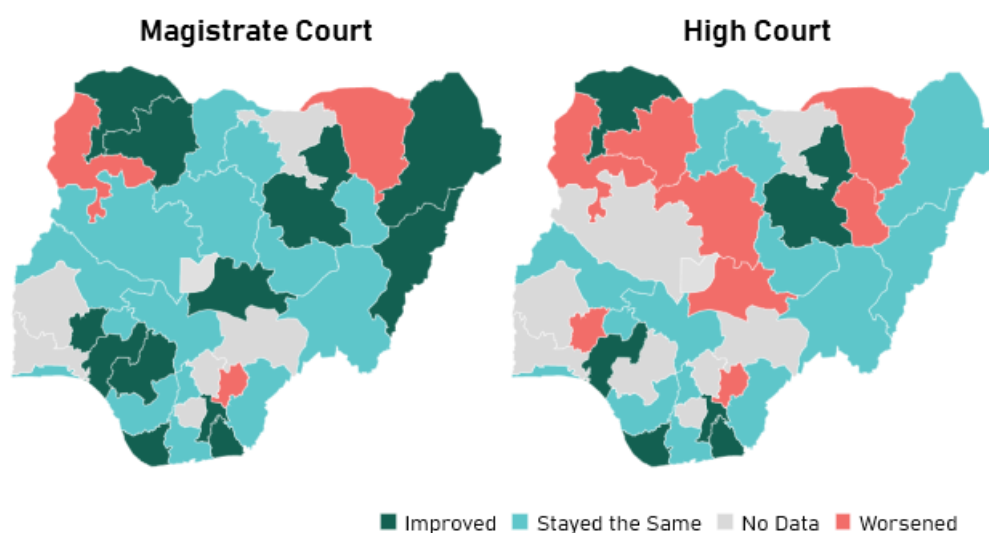
Grantee Relationships:

Legal Defence and Assistance Project (LEDAP) helped build the EFCC Academy, an e-learning platform to train EFCC investigators

ICPC ACAN updated curriculum and training on the National Ethics and Integrity Policy, integrating its principles into social and cultural behaviors for ICPC staff, CSOs, Anti-Corruption Transparency Units, and Private Companies

³⁷ Center for Fiscal Transparency and Public Integrity (2024)

Exhibit 10. Classification of the Average Time to Complete a Criminal Case from Arraignment to Judgement (2023 to 2025)



Evidence shows these legal reforms and improved implementation are filtering through to public perceptions; 40 percent of cross-case survey respondents feel that corrupt actors are more likely to be punished now than they were in 2020. As shown in case studies and grantee program literature, all On Nigeria cohorts have contributed to these emerging improvements by institutionalizing capacity building across the legal system (see more in [Finding 9](#)), embedding behavioural insights education into formal structures (see box, right), celebrating examples of integrity in public servants, and facilitating citizen-led advocacy efforts to pressure public officials.

These successes are rooted in decades of reform efforts. Since the early 2000s, Nigeria has ratified key international frameworks, enacted landmark legislation, and established specialized institutions to strengthen accountability.³⁸ These reforms laid a critical foundation for progress, even as enforcement gaps and institutional capacity challenges persisted before 2020 and continue to pose obstacles today. Continuous support, from the MacArthur Foundation and many other actors, has allowed both gradual, incremental changes to the legal system and anticorruption spaces to intermittently emerge, and to take advantage of sudden windows of opportunity. For instance, the MacArthur Foundation's previous human rights grants portfolio (initiated in 2000) supported criminal justice system reform, culminating in the ACJA's 2015 passage. As noted in the final On Nigeria 1.0 Evaluation and


Standardizing Behavioural Insights Education

ACAN developed a structured, reusable, and adaptable behavioural insights curriculum to serve as a foundational resource for guiding anticorruption efforts. The updated curriculum can be utilized not only by current stakeholders but also by future personnel, ensuring continuity in education. By creating a system where these materials are institutionalized within the organization, ACAN ensures that its programs remain relevant, on theme, and effective over time.

³⁸ These include the Corrupt Practices and Other Related Offences Act (2000), which created the ICPC, the establishment of the EFCC in 2002, the passage of the Money Laundering (Prohibition) Act (2002), the Freedom of Information Act (2011), and the Federal Administration of Criminal Justice Act (2015). Nigeria also committed to international frameworks such as the UN Convention Against Corruption (2004) and the African Union Convention for the Prevention and Combat of Corruption (2006).

Learning Synthesis report from 2020, On Nigeria built on these early efforts and included experienced grantees from the human rights portfolio, including them in the 1.0 Criminal Justice module and 2.0 Criminal Justice cohort.³⁹

Delphi panelists observe that, despite the improvements catalogued above, implementation remains uneven and often influenced by the prevailing political climate. As highlighted in [Finding 18](#), all Nigerian states have enacted ACJ/Ls. However, the content and structure of these laws vary across states, with only slightly more than half fully aligned with the core essential elements.⁴⁰ Although the federal ACJA was passed in 2015, many states adopted their respective Administration of Criminal Justice Laws (ACJ/Ls) later—Borno State being the most recent, in September 2023. This staggered adoption has resulted in varying levels of maturity in implementation, with some states more advanced and others still in the early stages.



"In continuation of our support from 1.0 we provided support and technical assistance to the ACJMC and its equivalent in Anambra, Bayelsa, Ekiti, Kano, and Rivers States, for one of its quarterly progress meetings to ensure effective implementation of the ACJAL."

– FIDA Final Report

■ **Finding 11: On Nigeria grantees and their partners successfully raised awareness of corruption, effectively engaging an increasing range of audiences (including historically disadvantaged groups and religious communities), by leveraging traditional and digital platforms, GESI-informed approaches, and long-term messaging.**

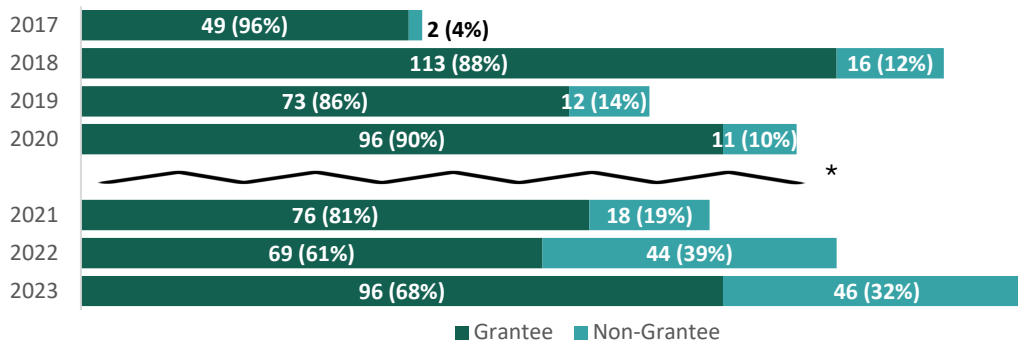
On Nigeria's TOC expected that by 2024, Nigerians would be more aware of the harmful impacts of corruption—part of the strategy's long-term vision of citizens rejecting corruption. Evaluation evidence suggests that On Nigeria has contributed to growing public awareness of corruption and shifting attitudes toward it, with rising exposure to corruption-related content through media reporting, films, training, and other channels.

According to On Nigeria's media monitoring data, corruption-related reporting has increased since 2016 and remained high in recent years. On Nigeria grantees, which make up a significant portion of the Nigerian media landscape, contributed a substantial amount of investigative journalism, but the proportion of investigative articles collected by the EL Partner in annual media monitoring produced by non-grantees has grown from around 4 percent in 2017 to 39 percent and 32 percent in 2022 and 2023, respectively (see Exhibit 11). The increase in non-grantee investigative reporting may suggest that grantees' significant investments in building the capacity of others to undertake investigative reporting are paying off. Forty-nine percent of cross-case survey respondents see media coverage of corruption cases either daily or weekly; among respondents who listen to religious leaders, 81 percent report hearing them speak frequently (daily, weekly, or monthly) about corruption, anticorruption enforcement, or integrity. Delphi panelists corroborated this perception, generally agreeing that public awareness has increased.

³⁹ These grantees are Legal Defence and Assistance Project, Centre for Socio-Legal Studies, CLEEN Foundation, and Nigerian Bar Association.

⁴⁰ These National Minimum Standards are considered essential for effectively implementing the ACJALs at the state level and are useful for systematically assessing the quality of implementation.

Exhibit 11. Proportion of Investigative Articles



A joint 2023 National Bureau of Statistics and the United Nations Office on Drugs and Crime (UNODC) report found that 70 percent of Nigerian citizens who were asked to pay a bribe refused to do so on at least one occasion. While a change in methods means this statistic can't be compared to prior surveys, other data points corroborate the finding that citizens increasingly reject corruption; the report found that between 2016 and 2023, the percentage of citizens who reported bribery cases to anticorruption agencies rose from 4 to 28 percent. During the same period, citizen reporting of bribery cases to the media also increased substantially—from 5 to 35 percent.⁴¹

Grantees and their partners have worked to engage a broad range of audiences, leveraging traditional media such as radio, television, and print and digital platforms including online news sites, Facebook, Instagram, and Twitter (X). According to media monitoring data, On Nigeria grantees produced roughly 20 percent of online articles in 2021 and 33 percent in 2023. Examples of grantee programs contributing to increased awareness include work by the Centre for Journalism Innovation & Development (CJID), which created and implemented two new online accountability tools: [UDEME](#), a website designed to track publicly funded capital, constituency, and ecological projects while providing investigative reports on their outcomes; and [DUBAWA](#), a fact-checking platform that debunks misinformation and disinformation.

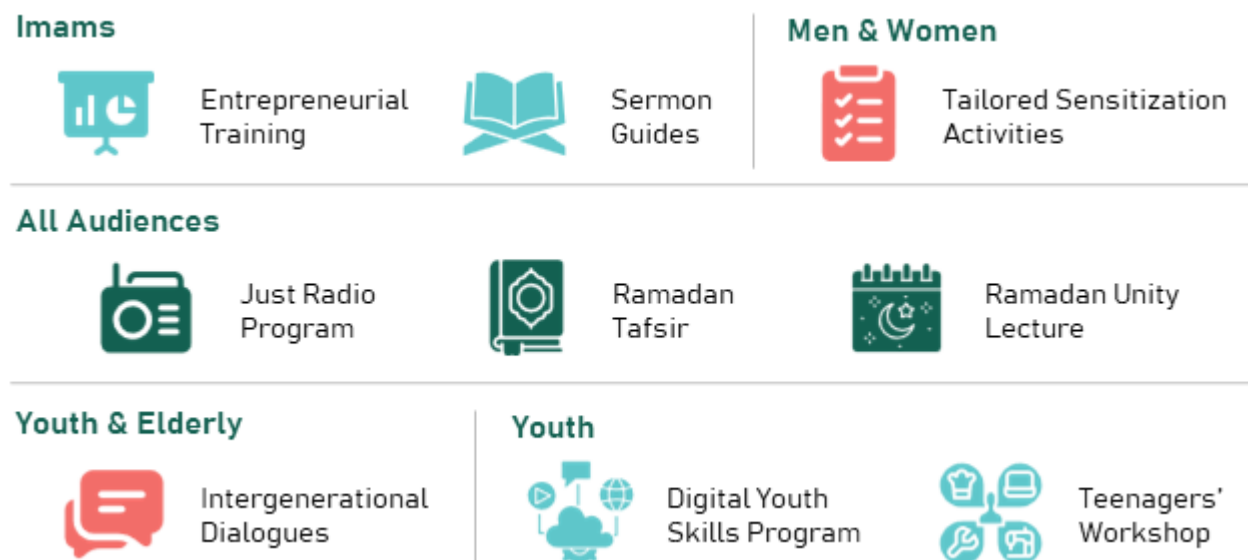
Grantees also used GESI-informed approaches to reach historically disadvantaged groups, such as women and youth, and others, like religious communities. Approaches include:

- **Translating resources into local languages:** Signature Communication Ltd.'s "Corruption Tori" radio shows translated into Pidgin, Hausa, Igbo, and Yoruba; CJID included an innovative audio tool in the DUBAWA platform that delivers local language fact-checks to reach non-English speaking audiences
- **Producing targeted news coverage:** CJID supported the WikkiTimes to produce a 12-podcast series titled "Unheard Voices" amplifying women's unique socio-cultural and economic experiences in Northern Nigeria
- **Tailoring training materials:** Al-Habibiyyah Islamic Society's EAT-Halal Program engaged a wide range of audiences, including imams, scholars, and youth, and focused on the experiences of specific groups (see Exhibit 12 for more details)

*Due to an update in methodology in 2021, there was a marked increase in the total number of articles collected, necessitating a subsample of 2,000 articles to be assessed moving forward. The full media monitoring methodology can be found here: https://www.macfound.org/media/article_pdfs/on-nigeria-2.0_lb6_2016-21_mm_annex_1_final.pdf

⁴¹ United Nations Office on Drugs and Crime (2024)

Exhibit 12. Al-Habibiyyah Islamic Society's Tailored Programming



Internal grantee documents and case studies also highlight the importance of consistent, long-term messaging and reporting to reinforce integrity values and shift social norms with these varied audiences. For example, HumAngle's multi-year reporting on the Knifar Women combined investigative journalism with innovative storytelling across multiple platforms, including podcasts and animated videos, to maintain public attention and pressure related to the wrongful detention of suspected Boko Haram members and their wives and families in poorly-run internally displaced persons camps.⁴² Interviewed staff from HumAngle believe that the relationships they have built through consistent contact and reporting over time have created a sense of trust, contributing to incremental but meaningful shifts in attitudes and behaviours related to demanding accountability.

However, many gaps remain. According to the program-focused literature review, rural communities are less aware of corruption, and rarely take action to reject it. This is exemplified by the case study on labor abuses in Ogun state, where workers were unaware of their rights, allowing quarries to abuse those rights with impunity prior to the investigative report.⁴³ Additionally, context-focused literature suggests that citizens still believe that personal power and wealth are more important than honesty.⁴⁴ Further, while the UNODC data above indicates refusal to pay bribes is increasing, there are geographic differences, such as those in northern states being more likely to refuse to pay bribes than southern states.

Findings 12: On Nigeria demonstrated that shifting corruption-related social norms and behaviors among diverse groups is possible, even if change is modest, slow, and begins with specific pockets of the population. The program showed the value of a strategy that: 1) provides consistent media coverage and amplification of corruption topics and anticorruption wins, and 2) systematically uses culturally appropriate behavioral insights approaches.

⁴² [cs-1_ir-change-stories_2024.pdf](#)

⁴³ [cs-1_ir-change-stories_2024.pdf](#)

⁴⁴ Leena Koni Hoffman (2025)

Continuous coverage and amplification has helped raise awareness of corruption. As mentioned in [Finding 11](#), a higher proportion of Nigerian citizens are refusing to pay bribes and are reporting bribery cases to anticorruption agencies and the media.

Internal grantee reports show that grantees and their partners across all cohorts produced materials that reached millions of Nigerians, sparking opportunities for participation and dialogue among audiences across the country. Behavior Change grantees broadcast radio programs and drama series, in addition to documentaries that sought to reshape public perceptions of corruption and foster integrity. Media and Journalism grantees have produced documentaries and podcasts in addition to the news reporting discussed above. Joinbodi Grantees built relationships with media networks to increase the scale and reach of their work, such as regularly making public statements and disseminating their research and publications. Criminal Justice grantees produced know-your-rights radio jingles and hosted call-in radio programs to improve citizen awareness. See box (right) for detailed examples of activities.

Grantee Media Amplification

HumAngle featured stories on three podcasts about the Knifar Women's movement; **Al Habibiyyah Islamic Society** held a weekly radio program discussing how religion encourages a disciplined life at home and in the public space. **FIDA** scripted, produced, and aired radio jingles on gender sensitive provisions of the ACJA **Paradigm Leadership Support Initiative** engaged various media platforms—including Channels TV, Premium Times, and others—to promote dialogue on public audit, accountability, and the enactment and implementation of audit laws at both national and sub-national levels.

Integrity Icon Campaign

This initiative seeks “name and fame” public officials who have served their duties with integrity. Each year there is a nomination process with several organizations serving as judges. There is an award ceremony where attendees discuss current issues regarding integrity and the icons are honored. AL partners with other organizations to then amplify the stories of the icons to build trust from citizens and inspire others.

In addition, On Nigeria has demonstrated that the intentional, systematic use of culturally appropriate behavioural insights approaches to help move the needle on corruption. Grantees have engaged a wide variety of actors, including government officials and agencies, students and teachers, religious communities, and private sector organizations. For instance, while they integrated a number of programs to encourage actors throughout the ecosystem, the Accountability Lab, Nigeria used the Integrity Icon program to inspire other public servants to follow their example (see box, left).

Grantees have also used a variety of approaches, including naming and faming anticorruption champions, faith-based sensitization, skill-building, and edutainment (content designed to teach or inform while also engaging and

entertaining the audience). For example, Behavioural Insights Team worked with Network Arewa24 and Griot Studios to integrate behaviourally-informed anticorruption messaging into Season 8 of their popular political drama, Kwana Casa'in Season 8.⁴⁵ A joint evaluation between Behavioural Insights Team and Equal Access International revealed substantial increases in perceptions of how frequently community members engage in reporting corruption and strong beliefs in the helpfulness of reporting. The evaluation also suggested that watching Kwana Casa'in increased the perception of how often other people report corruption and made viewers more likely to believe that reporting corruption is helpful.

⁴⁵ This season aired October–December 2022.

5.3. Transparency, Accountability, and Participation

Conclusion 4: Consistent with expectations, On Nigeria has contributed to signs of momentum in advancing transparency and participation, noteworthy results given the long-term nature of systems change and anticorruption efforts. While the level of accountability has held steady since 2020, the lack of deterioration is notable given the COVID-19 pandemic, the destabilizing effects of inflation, and political turmoil since 2020.

■ **Finding 13: By building on existing networks, On Nigeria grantees and partners were able to enhance everyday Nigerians' participation in monitoring budgets and the flow of public resources, and successfully push some government agencies to publish budget and other information. Evidence shows that these improvements contributed to observable progress in aggregate transparency and participation. Grantees and their partners also extracted accountability in some specific instances, which helped accountability hold steady during the programming period.**

The context-focused literature suggests that, relative to 2020, government transparency—especially in the areas of public financial management, procurement, and budgeting—has improved, as demonstrated by the country's changing score on the open budget survey between 2017 (17/100) and 2023 (31/100), the launch of open contracting portals in 26 states and at the federal level, and the creation of e-procurement portals in 32 states. There are also encouraging signs of momentum in civil society engagement and citizen participation in government processes, as case studies make clear, while at least some citizens are increasingly participating in substantive ways at both the state and federal levels and actively shaping government decisions.

"Well, it is basically through the CSOs and CBOs who are local, and they are part of our networks. So after they identify them for us, we go to the community, we meet with them, we tell them what we want, and if they want to participate, we now take them to the next level, that is, to train them on what we want to do."

– Grantee KII, Case Study

Grantees contributed to these gains by leveraging existing networks to create positive feedback loops, deepening relationships and collective actions that contributed to success. Case studies emphasize that grantees' systematic investments in building trust and relationships within local communities and with local governments enabled the tools grantees developed to better respond to local needs and encourage participation. Relationships with local governments were also essential to strengthen cooperative initiatives. For example, in utilizing BudgIT's existing Tracka budget monitoring platform to facilitate transparency, Arewa Research and Development Project leveraged its strong bonds with local CSOs and government leaders in Zamfara and Borno to identify training participants, and used step-down training to encourage use of the platform to monitor local constituency projects.

A case study of Social Action's Niger Delta work similarly illustrates the benefit of leveraging existing relationships. After several years working in the region, Social Action was able to call upon organizations they had previously partnered with to help support, mentor, train and sensitize diverse community-level groups and individuals to: a) monitor and identify issues in contract awards and budgets; b) amplify issues identified through media and

SERAP and Social Action's Community-Led Litigation

Social Action supported communities to file Freedom of Information requests pertaining to constituency projects and budgets. Any requests that went unanswered were passed on to SERAP who would litigate the matter at the Federal High Court on behalf of the community. In some cases, this resulted in the release of files.

grassroots actions to petition government and contractors; c) make FOI requests; and d) bring litigation to demand transparency, as necessary. According to interviews with Social Action and their partners, the increase in civic participation stemming from this work led to real improvements in transparency and accountability. Governments in Delta, Akwa-Ibom, Rivers, Bayelsa, Imo, and Edo states released previously secret files pertaining to budgets and used participatory budget processes. Others improved public service delivery by completing solar and borehole projects in Delta.

While it is true that transparency and participation are improving, it is not a given that progress will continue. As one Delphi panelist put it, *“Although public awareness and discourse on corruption have expanded significantly... sustained civic action... is weak, particularly in rural and disadvantaged communities, due to poverty, political manipulation, fear, and low capacity.”* Overall, the Delphi panel believes that participation is currently present more in form than in substance, where civil society inputs are not often incorporated into public decisions. In addition, the closing civic space described in [Finding 3](#) is a serious threat. Indeed, case studies consistently show that one-off government responses to engagement and advocacy efforts are relatively common, but longer-term reforms to strengthen accountability are scarce.

There are, however, examples of sanctions and enforcement being applied to corrupt actors, as well as some evidence of improved responsiveness and one-off instances of accountability on the part of government officials, many of which emerged from intensely relational work with local activists. For example, Learning Brief: Amplifying Investigative Reporting documents at least 36 instances in which authorities arrested and/or removed officials and individuals accused of corruption,⁴⁶ and several case studies featuring grantees across cohorts, and their partners, capture instances in which officials have improved public service delivery in response to citizen complaints.⁴⁷ This suggests that, though accountability may not have improved systemwide under On Nigeria—as multiple instances of media repression, crackdowns during the COVID-19 pandemic, and violence towards citizens exercising their rights make clear (see [Findings 3](#) and [4](#))—neither has it demonstrably declined.

■ **Finding 14: Many ecosystem actors affiliated with all On Nigeria cohorts leveraged previous work to strengthen and expand existing entry points for reforms in budget openness, public financial management, and citizen oversight. Existing institutional frameworks, opportunities for enhancing legal processes, and effective civic technology platforms provided the drive for these improvements.**

On Nigeria grantees and partners across all cohorts leveraged existing institutional and legal frameworks as well as proven civic technology platforms to advance reforms in budget openness, public financial management, and citizen monitoring, in many cases building on achievements from On Nigeria 1.0. Context-focused literature outlined a number of institutional reforms and frameworks set in place prior to On Nigeria and during 1.0, including creating the ICPC, establishing the EFCC, and the Money Laundering (Prohibition) Act in the early 2000s, as well as key transparency bills like the Freedom of Information Act in 2011, the Digital Rights and Freedom Bill in 2017, and joining the Open Government Partnership (OGP) in 2016. According to grantee documents, grantees and partners capitalized on these reforms to create political space for significant transparency initiatives. These initiatives, highlighted in the context-focused literature, included the Ministry of Finance's expansion of the Open

⁴⁶ [lb5_amplifying-ir_2023.pdf](#)

⁴⁷ https://www.macfound.org/media/article_pdfs/cs-1_ir-change-stories_2024.pdf

Treasury Portal and the launch of the Eyemark platform for tracking capital project implementation.

While Nigeria did not meet all its OGP Action Plan commitments for 2017–2019 or 2019–2021, context-focused literature highlighted meaningful achievements that emerged in open budget processes, open contracting (see [Finding 12](#)), and ease of doing business, including the creation of the Nigeria Open Contracting Portal and the first extractive-sector beneficial ownership transparency portal. On Nigeria grantees and partners were integral to pushing these major reforms during On Nigeria 1.0 and 2.0. Delphi panelists also emphasized that foundational legal instruments established prior to 2020, including the ACJA, the Freedom of Information Act, and compliance mechanisms like audits and Open Treasury Portals, served as important enablers for activists' work on transparency, participation, and accountability. In some cases, grantees and their partners could leverage such bills to launch legal cases and public interest litigation demanding adherence to the law, with some success (see box)⁴⁸.

The Role of Media and Journalism in Prompting Government Response

HumAngle's work with the Knifar Movement: Conducted long-term humanitarian journalism efforts on the wrongful detention of men in Borno and the mistreatment of their families in poorly run internally displaced persons camps. One year after reporting began, the Nigerian Army released the largest number of men to date.

Data-driven collaboration to amplify and address labor abuses in Ogun State: Cable Newspaper Journalism Foundation and Progressive Impact Organization for Community Development supported an investigation uncovering labor abuses at a Chinese-owned quarry. After the story was amplified on Progressive Impact Organization for Community Development's Public Conscious on Radio program, the National Human Rights Commission committed to further investigation of the issue, and the government-imposed sanctions on the this and other nearby quarries. Workers also received much needed protective equipment.

Leveraging local radio to drive action on stolen funds at Aliko Dangote University of Science and Technology: Freedom Radio and Wadata Media and Advocacy Centre investigated financial and management challenges at Aliko Dangote University of Science and Technology. The now former governor convened a visitation panel, and those involved in the reporting believe the new school administration is taking steps to reverse the issues, possibly influenced by the reporting.

Grantees also took advantage of another window of opportunity: the substantial increase in technology use, as outlined in [Finding 1](#). Civic tech initiatives led by BudgIT (Tracka) and CODE (Follow the Money), described in [Finding 12](#) and CJID's DUBAWA and UDEME, described in [Finding 11](#), made a real difference to both transparency and participation in targeted contexts. BudgIT also continues to innovate in this area through their Civic Hive Fellowship program, which focuses on empowering young startups in Nigeria to address governance issues, particularly through tech-enabled civic innovations. The Fellows interviewed have: conducted a policy hackathon, virtually bringing together hundreds of young people to brainstorm policy ideas; developed the first home grown civic tech solution to do needs assessments and community data collection to support budget processes; and established a legal tech platform to support provision of free legal support.

"I will speak in terms of some of the work of the fellows, particularly the policy shapers. They have democratized how students understand policy formulation and get involved in policy making and particularly some of the changes that have happened over time in the last one year is their reformed [standardized exam] campaign."

– Grantee KII, Case Study

⁴⁸ [cs_collab-stories_final.pdf](#)

The strategic use of existing civic technology platforms also proved effective in enabling transparency and accountability wins, though with varying degrees of success. In the cross-case survey, 19 percent of respondents—ten of whom were grantees—identified that hooking into existing open data initiatives and platforms such as OGP, Open Contracting Portal, Tracka, and the Beneficial Ownership Transparency Registry improved citizens' ability to access information, monitor spending, and hold institutions accountable, despite ongoing implementation and enforcement challenges.

6. What We Learned: On Nigeria 2.0's Legacy

6.1. On Nigeria Contributions to Sustainable Organizations and Durable Changes in Accountability Norms and Systems

Conclusion 5: On Nigeria has contributed to strengthening certain precursors for sustainable anticorruption efforts, including capacity advancements within grantee organizations, increased collaboration within the accountability ecosystem, and stronger legal frameworks governing the criminal justice system and anticorruption agencies. However, the sustainability of anticorruption gains remains fragile, with several major challenges especially evident: 1) time and effort needed to entrench new anticorruption social norms; 2) precariousness of anticorruption agency independence and effectiveness of other government agencies; 3) limits to ongoing funding for civil society organizations' anticorruption work; and 4) contextual factors such as high government staff turnover, insecurity, and shrinking civic space.

■ **Finding 15: On Nigeria's support—including grantees' skill building efforts and the program's Indirect Cost Policy—contributed to capacity improvements throughout the accountability ecosystem. Many grantees across all cohorts have strengthened their organizational and operational capacities, and built the anticorruption capacity of program participants. These gains appear solid for now, but there is more work to do to consolidate and sustain them in the long term.**

Previous EL products have highlighted that grantees view internal capacity building as essential to both their success and long-term sustainability. In a 2023 survey, grantees emphasized their appreciation for Foundation support in strengthening MEL systems, as well as in strategic communications—particularly in areas such as visual storytelling and effectively engaging government and other policymakers, which strengthened program quality and relevance. Many grantees reported tangible and lasting improvements in these areas, with 74% of grantees using the Foundation's indirect cost funding for staff development and training and, according to the indirect cost study, a shift toward understanding staff costs as strategic investments in institutional capacity and impact.

Indirect cost funding also contributed to grantee optimism about their sustainability by enabling them to manage their finances adaptively and invest in institutional durability and financial innovation, resulting in more fundraising efforts and stronger internal management systems,⁴⁹ though economic instability and high inflation still pose risks. Five grantees reported that rising costs reduced their ability to compensate staff adequately. A fail faire led

"Furthermore, the Foundation's mentorship and technical support have helped us improve our organizational structure and develop long-term sustainability strategies. By strengthening our institutional framework, the MacArthur Foundation has ensured that our organization is not only able to deliver on the current project but is also well-positioned to continue advocating for social accountability and anticorruption efforts in the future."

– Grantee Perception Survey

⁴⁹ https://www.macfound.org/media/article_pdfs/on-nigeria_2.0_lb12_org-strengthening_2024.pdf

by Accountability Lab in 2021 highlighted that these conditions contribute to staff burnout and mental health issues.

Evidence from multiple case studies also illustrates how grantees have built the capacity of the communities and individuals with whom they worked. For example, Al-Habibiyyah Islamic Society and HumAngle invested in strengthening the skills of imams, youth, and internally displaced women in income generation, digital skills, and investigative reporting, respectively. According to case study KIs, these initiatives reduced participants' inclination to engage in corrupt behaviors such as accepting large donations from congregants in exchange for favors or joining in Yahoo boys' activities, such as extorting people through email, and enhanced their ability to be active participants in anticorruption and accountability work (see box for others).

As with organizational sustainability, however, the durability of these efforts remains questionable. One Delphi panelist noted that government ownership and institutional memory of these initiatives is needed to sustain momentum. This is compounded by the CSO turnover described in [Finding 2](#).

Capacity Building Examples

Joinbodi and Criminal Justice grantees leveraged TV, radio, and in-person events to educate the general public and key accountability ecosystem actors on topics such as the provisions of ACJ/Ls.

Behavior Change grantees held public ceremonies, produced educational materials, and released documentaries to highlight and celebrate integrity champions to inspire others, foster a culture of accountability, promote the importance of ethical leadership, and encourage ongoing dialogue on integrity in public service.

The **ICPC ACAN** worked to increase awareness and build capacity around corrupt behavior and support approaches to tackle the deeper social norms that encourage corruption. They targeted a broad swathe of ecosystem actors including federal and state-level anticorruption agencies, Anti-Corruption and Transparency Units, attorneys general, Chief Executive Officers, Commissioners, Executive Directors, and staff of ministries, departments, agencies, private companies, CSOs, faith-based organizations, and NGOs.

CMPIA provided training that enhanced stakeholders' understanding of laws and policies and helped anticorruption agencies recognize how their reporting practices influence global corruption indices, leading to observable changes in behaviour.

■ **Finding 16: Collaboration among grantees and other ecosystem actors is strong, and sustainable in the short term. Grantees across cohorts as well as non-grantee partners have increasingly engaged in sectoral and regional networks, fostering collective action and mutual support due to MacArthur Foundation grantcraft tactics. However, evidence suggests that in Nigeria's complex environment, the durability of this progress is not guaranteed.**

Both the baseline and endline SNAs demonstrate robust and effective collaboration among On Nigeria grantees and a wide range of ecosystem actors. The cohort model appears to have functioned well, producing benefits that extend beyond any single organization or cohort, as demonstrated in [Finding 6](#). Interactions between grantees and non-grantees have been extensive, facilitating resource-sharing, joint problem-solving, and collective learning and action, and fostering the development of sectoral and regional networks. SNA data further confirm that intra-cohort partnerships were consistently described as frequent and intensive, reflecting sustained engagement and resource sharing (see Exhibit 13).

Exhibit 13. Intra-Cohort Collaborations for the Final SNA

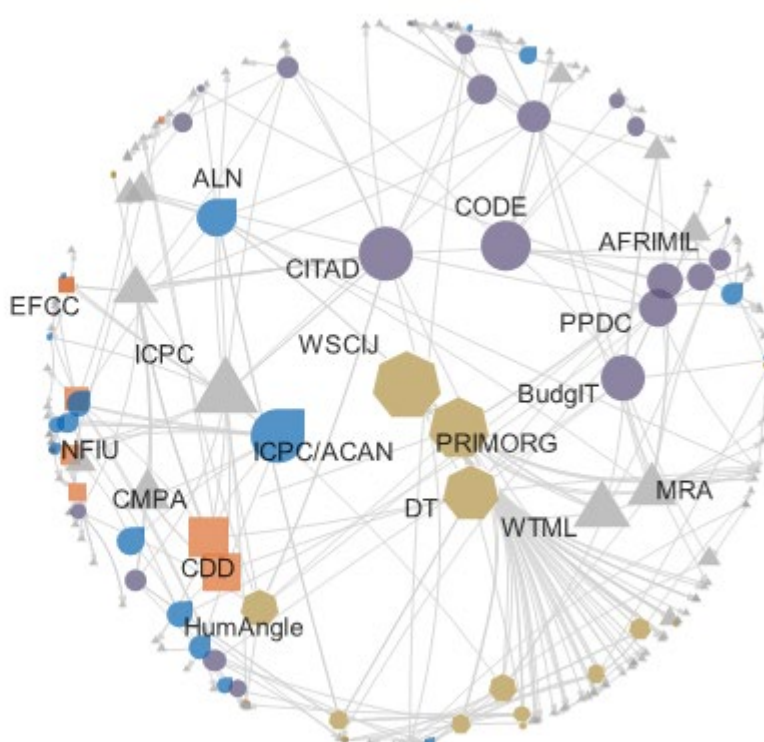
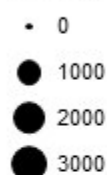
From	To	High Collaboration	Medium Collaboration	Low Collaboration	Total
Behavior Change	Behavior Change	36% (5)	64% (9)	0% (0)	4% (14)
Criminal Justice	Criminal Justice	100% (3)	0% (0)	0% (0)	1% (3)
Joinbodi	Joinbodi	60% (15)	40% (10)	0% (0)	8% (25)
Media and Journalism	Media and Journalism	32% (9)	50% (14)	18% (5)	8% (28)
Non-Grantee	Non-Grantee	47% (8)	41% (7)	12% (2)	5% (17)

Al-Habibiyah Islamic Society's initiatives illustrate how collaboration can strengthen grassroots engagement, help organizations navigate political and economic challenges, and sustain accountability work across contexts. African Centre for Media & Information Literacy has also done extensive work in connecting both international and national organizations to unite in advocating for the passage of whistleblower protection legislation. In addition, the endline SNA identified several organizations that serve as hubs, connecting many organizations together, such as Wole Soyinka Centre of Investigative Journalism, which runs the Collaborative Media Engagement for Development, and Inclusivity and Accountability group, which serves to connect media houses for exchanging technical support and amplification of stories to enhance and extend the reach of local media.

Exhibit 14. Key Connectors in the On Nigeria Accountability Network

The Endline On Nigeria Accountability Network

Degree



"We also need to deepen collaborations with those who are not already in the fold to see how we can expand the network...and connect them to government agencies that are going to be sympathetic or that can support their cause. And that means that there is need for some activities to be deepened, collaborative activities to be deepened, to do more so that we expand this kind of relationship."

– Grantee KII, Case Study

Multiple EL products likewise highlighted successful collaborative initiatives, including partnerships with ministries, departments, and agencies to strengthen ACJA/L implementation, amplifying investigative reporting, and sharing behavior change strategies across organizations.⁵⁰

As noted in EL products and in [Finding 6](#), the cohort model and other On Nigeria approaches created the time and space for grantees and partners to build trust, cultivate strong communication channels, and establish durable working relationships. These conditions have been critical to fostering collaboration that strengthens the accountability ecosystem. Some grantees have also deepened partnerships with grassroots organizations and communities, helping to embed motivation and drive locally,

and generate momentum that may sustain efforts beyond the life of the program. The consolidation of these new norms and practices indicates that many collaborative initiatives are positioned for short-term sustainability.

However, some respondents in two of the case studies noted that sustaining this progress over the long term will require continued investment and strengthening their collaboration with government and civil society actors.

■ **Finding 17: During the period of On Nigeria 2.0, the criminal justice system's policy environment has improved considerably, and evidence indicates that new processes and tools to strengthen the criminal justice system have significant staying power. Scaling and sustaining similar initiatives across the country, however, remains a work in progress.**

In 2023, Nigeria reached a major milestone when the last of the 36 states ratified their versions of the ACJ/Ls, the state-level enabling laws needed to codify and enforce the landmark federal level 2015 ACJA. This number is up from 28 in 2020 (and four in 2015). Of these, 19 fully comply with the core essential elements of the ACJA. Grantee documents showed that Criminal Justice grantees such as PWAN, CSLS, and the Nigerian Bar Association played critical roles in achieving this outcome, particularly in holdout states like Taraba and Niger. They reviewed draft bills, provided financial support for public hearings, and advocated with key lawmakers including Speakers of State Houses of Assembly and Attorneys General, building key support for the passage of state-level ACJLs.

"On the 18th of June 2021, the Centre reviewed Taraba State ACJ bill and furnished the state with financial support to conduct their public hearing on the Administration of Criminal Justice Bill. We are delighted to announce that Taraba State has passed into law the Administration of Criminal Justice Law on the 21st of December, 2021."

– CSLS, *Our 2021 Story of Progress*

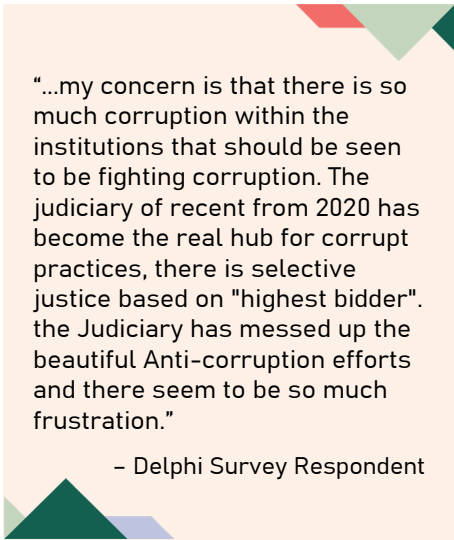
⁵⁰ https://www.macfound.org/media/article_pdfs/lb2-bc_approaches_2022.pdf, https://www.macfound.org/media/article_pdfs/lb4-granteesacas_2022.pdf, https://www.macfound.org/media/article_pdfs/lb8_policy-agencies_final_2023.pdf, https://www.macfound.org/media/article_pdfs/lb5_amplifying-ir_2023.pdf, https://www.macfound.org/media/article_pdfs/on-2.0_synthesis-learning-memo-2023.pdf, https://www.macfound.org/media/article_pdfs/on-nigeria_2.0_lb7_gesi_final.pdf, https://www.macfound.org/media/article_pdfs/cs_collab-stories_final.pdf, https://www.macfound.org/media/article_pdfs/lb14_criminal-justice_final.pdf, https://www.macfound.org/media/article_pdfs/cs-2_citizen-engagement-and-action_2024.pdf, https://www.macfound.org/media/article_pdfs/cs-1_ir-change-stories_2024.pdf, https://www.macfound.org/media/article_pdfs/on-nigeria_2.0_lb12_org-strengthening_2024.pdf, https://www.macfound.org/media/article_pdfs/maj-synth.-memo_final.pdf

Administration. Evidence from the evaluation suggests that On Nigeria contributed to modest but meaningful improvements in the independence and effectiveness of legal system actors. Grantees built the capacity of judges, prosecutors, police, court staff, and civil society to comply with and enforce legislation such as the Penal Code and the ACJA/Ls. These gains were reinforced by sustainable training systems including structured curricula, e-learning platforms, document repositories, and train-the-trainer models that strengthened the skills of justice-sector actors, particularly lawyers, to uphold the law and prosecute corruption more effectively, some of which is detailed in [Finding 9](#).

Assessment. Several grantees pioneered mechanisms to monitor implementation of the ACJA. CSLS developed and institutionalized the National Minimum Standards and Peer Review Scorecards, tools for assessing performance in ACJA implementation. These were formally endorsed by the Federal Ministry of Justice in 2024, signaling high-level policy integration, and have also been embedded into states' operational planning following a national technical review conference attended by all 36 states' Ministries of Justice and ACMJC's in 2023. Grantees further supported the creation of State ACJMCs in Gombe, Akwa Ibom, and Kaduna. In Gombe, PWAN and the Federal ACJMC mobilized stakeholders and drafted an action plan; in Akwa Ibom, LawHub Development and Advocacy Centre conducted advocacy targeting judicial leaders; and in Kaduna, grantees provided essential office equipment to strengthen the committee's operations. CMPA also advanced this agenda by training anticorruption agencies on performance reporting.

Implementation. Other grantee interventions have directly improved enforcement of criminal justice processes (such as the Police Duty Solicitor Scheme described in [Finding 9](#)). Survey evidence reflects these shifts: most cross-case survey respondents believe that lawyers have become more effective in prosecuting corruption since 2020, and 40 percent reported that corrupt legal system actors are more likely to be punished than before. However, perceptions of judges remain divided, and views on the police are especially mixed—while 30 percent of respondents felt the police are more effective than in 2020, Delphi panelists and literature sources including Afrobarometer and Chatham House confirm that police remain widely distrusted.

Other challenges also persist. Delphi panelists emphasized that corruption within the police and judiciary continues to undermine the credibility of prosecutions, and some fear selective prosecution and corruption are worsening. The 2024 Justice Sector Assessment Report by the Public and Private Development Centre highlighted severe technological deficiencies, with courts still heavily reliant on analog processes, leading to case backlogs and lengthy timelines. As noted in [Finding 10](#), regional disparities indicate that further scaling is needed to systematize changes in the criminal justice system nationwide.



“...my concern is that there is so much corruption within the institutions that should be seen to be fighting corruption. The judiciary of recent from 2020 has become the real hub for corrupt practices, there is selective justice based on “highest bidder”. the Judiciary has messed up the beautiful Anti-corruption efforts and there seem to be so much frustration.”

– Delphi Survey Respondent

■ **Finding 18: There are promising signs of improved independence and effectiveness of anticorruption agencies and ministries, departments, and agencies, but the durability of these changes remains in question due to political interference, funding challenges, and persistent turnover.**

"ICPC has the ACTUs in Ministries, Departments, and Agencies... as well as the Ethics and Integrity Compliance Scorecard deployed annually... These two mechanisms have led to gradual improvements in compliance among some MDAs."

– Delphi Survey Respondent

Delphi panelists and grantees responding to the 2024 Grantee Perceptions Survey underscored that institutional change across Nigeria's anticorruption landscape remains uneven, with progress varying widely by region and level of government. Pockets of promising reform have emerged—particularly at the state level and within departments of the EFCC and ICPC. Examples include EFCC's record recovery of illicit funds in 2024 and ICPC's development of Anti-Corruption and Transparency Units (ACTUs), the Ethics and Integrity Compliance Scorecard, school-based anticorruption clubs, and integration of the National Values Curriculum into schools and colleges.

Delphi panelists observed that, though anticorruption agencies and other ministries, departments, and agencies cannot yet be fully trusted to enforce corruption laws consistently, they are more credible than they were in 2020. Case evidence also points to instances where government actors have been more responsive to citizen complaints. For example, following the Corruption Tori town hall in Achi, Oji River local government area, public officials reduced roadblocks, improved electricity distribution, and temporarily reduced police checkpoints. Similarly, reporting by The Cable and Progressive Impact Organization for Community Development prompted National Human Rights Commission-enforced sanctions against quarry owners violating labor laws in Ogun State. However, the limited and temporary nature of such actions highlights concerns about durability; sanctions often lack weight, and enforcement remains contingent on political will. Delphi panelists reinforced this point, noting that the implementation of anticorruption measures continues to be inconsistent and politically driven.

"But the last time I went through that part the numerous checkpoints where people normally pay bribe, all had reduced so that was an amazing thing. It used to be an issue where you are coming back and they are stopping you for this and that and that, so you can stop. So I want to believe that the town hall had an effect, probably caused that."

– Grantee KII, Case Study

At the same time, political interference, resistance to reform, and societal tolerance for corruption threaten to erode progress. For example, interviewees connected with ICPC ACAN's work raised concerns about ACAN's vulnerability to political influence. In addition,

"The subnational level has yet to fully adopt or institutionalise accountability mechanisms, often treating anticorruption efforts as external or federally imposed."

– Delphi Survey Respondent

funding gaps and persistent turnover in government agencies have repeatedly disrupted ACJA and ACJL-focused activities, as reported in Learning Brief: Criminal Justice.⁵¹ Delphi panelists further cautioned that despite advances at EFCC and ICPC, reforms remain fragmented, underfunded, and poorly mainstreamed. Without stronger coordination, political ownership, and long-term sustainability planning, these gains risk stalling or reversing.

⁵¹ https://www.macfound.org/media/article_pdfs/lb14_criminal-justice_final.pdf

7. Concluding Reflections

7.1 Future Priorities for Anticorruption Work in Nigeria

Much more is needed for Nigeria to achieve a self-sustaining and broad virtuous cycle of anticorruption action and successes, including continuing to adapt and scale many of the efforts and tactics that On Nigeria has supported. Specific priority areas are presented below.

▀ **Priority 1: Continuing to strengthen the accountability ecosystem will require creating and strengthening mechanisms and habits of collaboration and adaptive learning, especially among government institutions. On Nigeria offers good models for strengthening collaboration, but mechanisms for collaboration among CSOs and other ecosystem actors must not all be donor-dependent mechanisms.**

This report outlined many gains in collaboration shown throughout On Nigeria, leading to a stronger accountability ecosystem, as described in Section 5.1. Much of the evidence shows both collaboration and adaptive resilience improved in the ecosystem, as illustrated in [Findings 6](#) and [7](#).

That said, further strengthening collaboration remains a priority, especially among actors who have not been directly connected to On Nigeria. Delphi panelists, for example, described collaboration as largely fragmented, symbolic, and project-based. They also explained that government institutions, such as the police, judiciary, and anticorruption agencies, are not collaborating effectively. Evidence from the case studies further substantiates this point, with many interviewees across cases expressing a desire for more engagement and action by government and legal system actors. For example, in the Whistleblower Protections case, grantees reported a lack of sufficient engagement by government actors, such as EFCC, ICPC, the National Assembly, and the Ministry of Finance. They further reported that this lack of engagement reduced their ability to communicate with and collect information from government counterparts. Grantees also faced challenges with limited time available in their own work to effectively engage with their partners. The Police Duty Solicitor Scheme case similarly documents a lack of engagement from governmental institutions and CSOs alike, while HumAngle found that competition between media houses sometimes hinders collaboration.

Participants in the sensemaking phase of this evaluation supported the idea of further promoting collaboration throughout the ecosystem. They suggested that donors support these efforts, at least in the short term, while anticorruption agencies and government actors need to do a better job to share data between agencies and CSOs, institutionalize partnerships to get beyond time-limited projects, and establish communities of practice and coalitions. Support for these efforts could enhance the use of adaptive learning to institutionalize collaborative behaviours and enhance the results of partnerships.

▀ **Priority 2: On Nigeria made progress in advancing GESI in specific areas, but the integration of GESI across the portfolio fell short. To further broaden and deepen GESI throughout the accountability ecosystem, grantees and other actors would benefit from more systematically sharing and supporting use of GESI integration tools to guide reporting, design reform efforts, learn adaptively as they implement these efforts, and amplify the voices of historically disadvantaged groups.**

Throughout On Nigeria 2.0, grantees made advances in diversifying the accountability ecosystem and contributed to modest anticorruption gains for historically disadvantaged groups, which are outlined in [Finding 8](#) and [Finding 11](#). Despite positive examples, however, data from Delphi panelists and the SNA demonstrate that the participation of these groups remains limited in the ecosystem writ large.

Organization-level policies and practices regarding GESI are not widely in evidence among ecosystem actors. In Learning Brief: GESI Strategy and Implementation, only five of the thirteen grantees interviewed reported that they have an internal policy related to GESI, whereas a document review linked to the same learning product suggested that 24 On Nigeria grantees (29 percent) did not have any GESI-related policies or practices. Those interviewed remarked that they could use additional training to help better institutionalize GESI internally.

“Yeah, I’m not sure that too many groups have understood how to include previously disadvantaged groups and I’m not sure that previously disadvantaged groups have also been able to better engage in what is going on. So I think that we’re all saying there’s still room for improvement in that area.”

–Grantee, Case Study

“So, we would appreciate any additional materials or resources or even training for the organization . . . staff, and if the resources are available to also include our partners, that would be a welcome idea. Because if something is repeated over and over again, it helps in internalization of the knowledge and making it a culture, a way of life of the people.”

– Grantee KII, Case Study

To support GESI-centered design the Foundation’s Technical Assistance Partner created a GESI Integration Tool,⁵² a self-assessment guide that enables users to determine where their efforts fall on the GESI continuum. However, only four of thirteen grantees interviewed reported using it. As grantees requested additional tools and resources, this and similar tools could be further disseminated and integrated into ecosystem actors’ strategies and program design.⁵³

Some of the participants in the participatory sensemaking session supported these views, sharing that despite some progress in bringing historically disadvantaged groups into more central roles in the ecosystem and achieving anticorruption wins for these groups, there remains a long way to go. They recommended that media organizations

encourage universities to make their journalism departments more accessible to historically disadvantaged students and, in turn, intensify diversity and inclusion initiatives within their own organizations through training and investment in accessible facilities. They also suggested that donors support additional capacity building and build on some of the already successful initiatives in this area.

Priority 3: Further improving the equitable, consistent application of criminal justice to strengthen the prevention and prosecution of corruption will require 1) additional improvements to existing legislation, 2) further investment in the resourcing and training of criminal justice actors and institutions, and 3) strengthening the connections and coordination between reform-minded actors across the country.

Grantee documents, Delphi panelists, and sensemaking participants underscore that further improving the equitable and consistent application of criminal justice will require targeted legislative reform, increased resourcing and training for justice sector actors, and stronger

⁵² [https://www.macfound.org/media/article_pdfs/gesi-integration-tool_final-\(2\).pdf](https://www.macfound.org/media/article_pdfs/gesi-integration-tool_final-(2).pdf)

⁵³ [on-nigeria.2.0_lb7_gesi_final.pdf](#)

coordination among reform-minded institutions across Nigeria. These changes are necessary both for continuing to improve the prosecution of corrupt acts and to protect historically disadvantaged groups from the negative effects of corruption.

Conflicting provisions between the ACJ/Ls and other state-level legislations, such as State Penal Codes, continue to pose barriers to uniformity and coherence in the administration of justice. These discrepancies create confusion among legal practitioners and contribute to inconsistent application of the law. During the participatory sensemaking session, grantees emphasized the importance of using the new Tax Law⁵⁴ and proposed State Police reforms to advocate for more coherent and inclusive justice frameworks that strengthen local accountability and resource allocation.

Sustaining and expanding the modest but meaningful improvements in the prevention, prosecution, and rejection of corruption that On Nigeria has contributed to will require continued investment and deeper coordination among justice reformers to leverage existing support networks, reduce duplication, modernize infrastructure, and further equip judicial personnel with case management skills and tools (see box, right, for more details). Maintaining and growing civil society collaboration through existing platforms, like the JURITRUST Learning Centre, was also named as a priority.

Participatory sensemaking participants further recommended 1) the creation of a watchdog to monitor judicial spending, 2) ensuring that ACJMCs in all states have functional secretariats and consistent funding, and 3) reinforcing the judiciary's financial autonomy.

Infrastructure improvements, such as establishing dedicated statement-taking rooms at police stations, were also identified as critical to improving procedural fairness, as was standardized and funded capacity-building programs for court registrars, clerks, and secretaries.

■ **Priority 4: Expanding On Nigeria's progress in building awareness of corruption and its harmful effects will require engaging more audiences and actors. This means continuing to increase the quantity and quality of media coverage, incorporating accountability and integrity topics in comprehensive civics education, and leveraging novel methods and mediums to disseminate messages and reach a broader range of groups.**

Grantees have used a variety of successful tactics to increase citizen awareness of corruption and its harmful effects, including on the most vulnerable groups, many of which are described in [Finding 11](#). These include media coverage of ongoing corruption cases, investigative reporting, edutainment programs, and other civic education initiatives, all of which show promise in raising awareness of how to combat corruption. According to sensemaking

Challenges Faced by the Criminal Justice System

The 2024 Justice Sector Assessment Report by the Public & Private Development Centre highlights widespread technological deficiencies across Nigeria's judicial system, largely driven by reliance on analog processes. Deficiencies have resulted in lengthy case timelines and substantial backlogs, enabling corrupt actors to evade sanctions and undermining public trust in the criminal justice system.

⁵⁴ The Nigeria Tax Act 2025, takes effect on January 1, 2026, with the aim to streamline tax compliance, broaden the tax base, strengthen enforcement, and harmonize overlapping tax regimes. Among the most salient changes is the revised VAT revenue-sharing formula, which will see Local Government Areas slated to receive 35% of VAT revenue, creating a greater "pool" of funds for local governments. Local Government Areas could allocate portions of this funding to policing, courts, legal aid, etc., but also must split this among other priorities such as infrastructure, health, and education spending.

participants, leveraging these and other innovative methods could serve to consolidate and extend current progress.

Participants also recommended that media organizations 1) continue training journalists on subjects such as artificial intelligence, fact-checking, and investigative reporting, 2) seek professionalism in social media, and 3) further integrate corruption into media programming. They further proposed integrating anticorruption programming and civics into all levels of education in schools and religious institutions, edutainment, awards and endowments in research, and professional bodies' training modules (such as the Institute of Chartered Accountants of Nigeria, Nigeria Medical Association, Nigerian Bar Association, and the civil service). Finally, participants hoped to see donors reinforce anticorruption messaging and support ongoing behaviour change programs like the Shugabanci Radio Program and its listening groups, given the long-term and non-linear nature of social and behavior change described in [Finding 5](#) and the geographical discrepancies in awareness and rejection of corruption described in [Finding 11](#).

"HEDA developed three jingles on anti-corruption, good governance, accountability, and whistleblowing. The jingles were produced in two different languages (English and Pidgin). The purpose of these jingles was to engage citizens on the fundamental duties of government officials in providing good governance."

– Joinbodi Grantee Document

Priority 5: There remains ample opportunity for ecosystem actors to strengthen the rollout and depth of community-focused transparency and monitoring platforms, promote transparent government processes and service delivery, and ensure corporations integrate ethical guidelines.

Delphi panelists argued that while civic engagement and technology-driven oversight are strengthening citizen efforts to hold government accountable, these actions do not consistently translate into institutional reforms that facilitate system-wide transparency and prevent corruption. There is limited evidence of government institutions and agencies at all levels explaining their decisions to the public or engaging in public outreach. Many government institutions remain largely opaque, and evidence of substantive improvements in public outreach is minimal.

The civic tech and constituency project tracking activities described under [Findings 12](#) and [13](#), including the adoption of open contracting portals in 26 states and the successful use of Zamtraka and Bornotraka, show how transparency has improved in some cases, with modest accountability results thereby beginning to emerge. But Delphi panelists, warning that some transparency efforts are superficial or inconsistently implemented, suggest that further support for implementation of these and similar platforms is a key step for future emphasis. Participatory sensemaking participants echoed the need for improved transparency, suggesting that anticorruption agencies and government actors enforce the Corporate Affairs Commission mandates, communicate more about public service delivery, and ensure corporations integrate ethical guidelines.

"While the On Nigeria program has significantly contributed to improving transparency through civic tech innovation, media engagement, and legal advocacy, these gains have yet to become fully institutionalized across all levels of government. Transparency is improving but not yet systemic."

– Delphi Survey Respondent

▼ **Priority 6: Building on On Nigeria's gains related to transparency, participation, and accountability will require ecosystem actors to continue prioritizing efforts to equip and incentivize government authorities at various levels to resist and prosecute corruption, model integrity, and engage citizens regularly.**

[Finding 13](#) shows the signs of momentum that On Nigeria 2.0 made in advancing transparency and participation, but effectiveness remains limited. Indeed, [Findings 10](#) and [17](#) show incremental improvements in specific key anticorruption agencies, such as the EFCC And ICPC. However, systematic institutional changes across government remain fragmented and inconsistent. Delphi respondents broadly agree that the foundational legal, institutional, and civic infrastructure needed to improve accountability exists. Yet, effectiveness remains limited.

Participatory sensemaking participants recommended further strengthening institutions such as ACAN to help professionalize and sustain integrity norms within the public sector. They also called for donors to provide more support, including capacity building for ACAs, given how central these agencies are to institutionalizing and scaling reform. These recommendations reflect a consensus, among grantees and Delphi panelists, that durable change will depend not only on citizen engagement and civil society pressure, but also on the sustained empowerment of government actors who are positioned to lead reform from within.

7.2 Lessons from On Nigeria's Decade of Programming

Making headway in shifting the entrenched incentives and power structures that drive corruption, much less creating a virtuous cycle in which accountability fuels the sustainable control of corruption, often takes decades. And yet, in ten years, On Nigeria contributed to incremental advances in strengthening Nigeria's accountability ecosystem, as well as observable progress in civil society and government actions related to the prevention, prosecution, and rejection of corruption. The program also created emerging momentum for more government transparency and citizen participation in anticorruption efforts. These are noteworthy results, especially given the complex realities of the corruption landscape in Nigeria, the program's relative overall portfolio size consisting of many small grants, and the ultimately short duration of On Nigeria.⁵⁵

What lessons, then, should ecosystem actors, donors, researchers, advocates, and other anticorruption practitioners across the world take from the experience and results of On Nigeria? And most importantly, how might these lessons be used to inform future systems change efforts, in Nigeria and beyond? This final section offers two interconnected lessons related to On Nigeria's strategy and the way it operated, concluding that these features were essential to the return on investment On Nigeria achieved, and could serve as a compass to guide other systems change initiatives.




LESSON 1 (STRATEGY): On Nigeria's systems-focused strategy of resourcing and supporting dynamic, locally-led, complementary, and flexible initiatives at multiple levels offers a viable approach for driving sustainable progress towards systems change.

⁵⁵ This is not to state that On Nigeria's investments were negligible. Rather, it is to consider these investments in the broader scheme of a decades-long intractable problem. Other donors have regularly invested tens of millions in a single project in Nigeria. And while the Big Bet On Nigeria launched in 2015, Section 2.2 describes the natural pace of startup and grant-funding over the first few years that launching a program based on many small grants requires – considering the timeline from Section 2, On Nigeria's window to generate this momentum appears shorter than 10 years.

On Nigeria supported efforts at all geographic levels (local, state, and federal), and facilitated cross-pollination, learning, and integration among diverse voice and teeth ecosystem actors. Its systems-based approach incrementally layered on the results achieved by previous MacArthur-funded programs and encouraged complementary tactics among actors who shared a long-term goal. This strategy aligns with emerging thinking about next generation social accountability work, and despite some gaps, delivered results that matter, suggesting that others might apply similar models in the future.

As detailed in Section 7.1, much more needs to be done to improve responsive, accountable governance in Nigeria, and there are many steps remaining in the country's anticorruption journey. Some of On Nigeria's newer programming areas, such as efforts to mainstream GESI throughout the portfolio, remain incomplete, with resource constraints and a lack of tools and know-how creating barriers for many ecosystem actors (despite the fact that On Nigeria, with the help of some GESI-skilled grantees, provided useful GESI orientations and skill-building). This in turn had consequences for historically disadvantaged groups in the broader accountability ecosystem, who often bear the brunt of the pernicious effects of corruption.

On Nigeria recognized from the outset that a single portfolio would not realistically do all that is needed to drive the social changes underpinning transformative anticorruption reform. Still, On Nigeria's strategy and its implementation substantially influenced Nigeria's anticorruption landscape. The program managed to achieve noticeable successes, particularly by contributing to the emergence of a more collaborative, inclusive, and resilient accountability ecosystem, the foundation of its TOC. On Nigeria's experience therefore suggests that others seeking to contribute to systems change might learn from the On Nigeria strategic approach. That is not to say that the program's strategy should be seen as a model to be replicated across contexts. On the contrary, it is a demonstration of the value of integrating structures and practices that promote ongoing learning, support thinking and working politically, encourage the application of contextually tailored tactics, and focus on building an ecosystem of diverse, networked anticorruption advocates and actors across sectors and geographies.

 **LESSON 2 (TACTICS): On Nigeria's ways of working, or grantcraft, were indispensable for the results to which it contributed. Its approach demonstrates the value of tailoring work contextually, proactively prioritizing and addressing grantee needs, and making flexibility and local leadership central. While these are common refrains in contemporary social impact work and philanthropy, this "way of doing business" is rarer in practice.**

On Nigeria's approaches not only furthered the effectiveness of the grants themselves, but also strengthened the accountability ecosystem overall, tying into the broader strategy success captured in Lesson 1.

Three aspects of its grantcraft stand out as especially useful:

1. The **participatory approach to program design and implementation**, through which the On Nigeria program co-created shared line of sight for both the 1.0 and 2.0 phases at portfolio and cohort levels with grantees, and consistently invested time and resources in collective learning and adaptation.
2. The **cohort model**, through which the program proactively facilitated and resourced collaboration among grantees with complementary goals and expertise.

3. **Skill-building and organizational strengthening support**, through which On Nigeria sponsored technical assistance on topics like organizational governance, evidence-based learning, GESI, and the use of behavioural insights, while also providing indirect cost support and long-term funding that allowed organizations to strengthen their sustainability.

Many grantees noted that the program's **participatory approach**, as demonstrated by the co-creation of cohort-level strategies, and the **cohort model**, helped create regular engagement, trust building, and complementary learning and action. The structured mechanisms for collaboration provided by the cohort model—meetings, knowledge sharing platforms, and networking opportunities—incentivized partnerships among grantees within and across cohorts, and contributed to a variety of networked initiatives that delivered anticorruption results. This approach strengthened the effectiveness of the grants themselves and also strengthened the accountability ecosystem they worked in. The program's **skill-building and organizational strengthening modalities** also provided grantees the space and support they needed to strengthen the scale and sustainability of their anticorruption work, as explained in [Finding 7](#), and further build out the accountability ecosystem.

These elements gave grantees and their partners the frameworks, flexibility, and mechanisms they needed to develop skills, collaborate rather than compete with others in the ecosystem, craft relevant programming that suited the specific contexts in which they were working, and adapt rapidly to emerging learning. The experience of On Nigeria suggests that other donors and grantees pursuing complex change might learn from the program's approach to grantcraft, and consider the ways in which its elements might be adapted and applied in their local contexts.

7.3 Reflections: On Nigeria as an Example of New Directions in Social Accountability Programming

On Nigeria's strategy was developed in 2015 and revised in 2020, with further adjustments following in 2022. Despite this, its strategy in large part corroborates insights from a 2023 meta-analysis of 157 social accountability interventions, in which Florencia Guerzovich and Tom Aston argue that the next generation of social accountability work should focus on contributing to responsive systems and accountable social contracts. They label these emerging initiatives Social Accountability 3.0 to distinguish from both social accountability 1.0, which emphasized locally-bounded, technocratic projects seeking to improve transparency, and social accountability 2.0, which sought to deliver huge programs to transform sectors and mass movements.⁵⁶

On Nigeria's strategy also largely aligns with Brendan Halloran's contention that the work of accountability is fundamentally non-linear, and should be primarily concerned with strengthening relationships between not just citizens and government, but a diverse set of reform advocates throughout a system.⁵⁷ For Halloran, Guerzovich, and Aston, there is no one-size-fits-all approach to accountability. Instead, a healthy accountability ecosystem looks different in different contexts, and must be built from the bottom up, in locally-led processes of learning and adaptation.

⁵⁶ [Social Accountability 3.0: Engaging Citizens to Increase Systemic Responsiveness by Florencia Guerzovich, Tom Aston: SSRN](#)

⁵⁷ [Accountability Ecosystems: The Evolution of a Keyword—Accountability Research Center](#)

Considered together, Guerzovich and Aston, and Halloran, offer a fresh take on how to best understand social accountability initiatives. Exhibit 15 offers a stylized composite of Guerzovich and Aston’s framework for conceptualizing Social Accountability 3.0. Many of these core elements are clearly in evidence in On Nigeria—even though the program was conceived, operating, and iterating in parallel to the emergence of this school of thinking. The program presents a compelling example of Social Accountability 3.0 and ecosystem thinking being applied in practice, and demonstrates what such an approach—tailored to the local context, and led by local changemakers—can make possible in complex systems.

Exhibit 15. On Nigeria Exemplifying Elements of Social Accountability 3.0 and Ecosystem Thinking

Element	On Nigeria in Practice
Systems Awareness: Develop some workable level of system awareness and sensing capacity	Focused squarely on the accountability ecosystem, to support the emergence of policies, practices, relationships, networks, mental models, and power dynamics that could contribute to collective impact in the longer term
Realpolitik: Infuse some degree of contextually-anchored pragmatism	Set expectations and outcomes for 2.0 based on the evidence from 1.0, and through a process that sourced and reflected the contextually-grounded ambitions and realism of many Nigeria experts; embedded efforts to think and work politically at project, cohort, and portfolio levels
Leverage Points & Nodal Actors: Identify potential leverage points in a sectoral system, and focus on the stakeholders most relevant for priority outcomes	Chose grantees strategically to include a range of actors with leverage at different points in the ecosystem, including several who were already key nodes in the network and others who served key bridging roles
Systemic Responsiveness and Portfolio Learning: Focus on contribution and be attentive to interaction effects across the portfolio	Put in place practices and processes—technical assistance, regular meetings, learning events, etc.—to support ongoing cycles of learning and adaptation at portfolio, cohort, and project levels
Bricolage: Recombine the most relevant aspects of appropriate social accountability tools	Built flexibility into grants, so that grantees could develop, contextualize, and adapt many social accountability tools, from scorecards to data platforms to legal reform, at various levels of the system, and encouraged learning and adaptation to ensure grantees and partners could identify the best bits
Layering: Build on past programming, to build incrementally over time, and apply a relational and system lens	Grounded in the experience of On Nigeria 1.0 and previous programming, especially the criminal justice sector reforms and the foundation’s previous human rights portfolio, and systematically sought to build on decades of reform efforts in Nigeria

7.4 Considerations: Looking Toward the Future

This evaluation recognizes that those closest to and most harmed by corruption and accountability gaps in Nigeria are the best placed to develop and implement the solutions to those problems. Consequently, this report does not offer recommendations. Instead, considering the findings, conclusions, priorities, and lessons presented above, we offer considerations for different groups of stakeholders, in the hope that these considerations can help others use the experience of On Nigeria as a jumping off point for developing their own approaches to driving further progress on anticorruption and accountability—including with respect to the priorities laid out above—in Nigeria and beyond.

For On Nigeria grantees:

- 1) How will former grantees continue to collaborate in the accountability ecosystem, both with established partners and with others? What are the challenges for future collaboration and how might former grantees act now to mitigate those challenges?
- 2) What would it take to improve the sustainability of programming, organizations, and the results to which each grantee has already contributed? What actions can former grantees take to move this forward?
- 3) How might former grantees expand evidence-based learning and GESI skills, and embed those skills into organizational practice to deepen the work's inclusivity?

For other ecosystem actors:

- 4) How might other ecosystem actors apply the lessons and insights above into their own ways of working? What would adapting and applying the key elements of On Nigeria's approach make possible for each actor?
- 5) What would it take for each actor to continue and strengthen collaboration within the accountability ecosystem? How might each actor bring others into the hard, collective work of social accountability?
- 6) What can actors do to identify upcoming windows of opportunity? How can each actor prepare to take advantage of potential windows both individually and with others?

For global accountability and anticorruption practitioners and researchers:

- 7) What would it look like to adapt and adopt On Nigeria's strategic approach in global actors' work—not the strategy itself, but a strategy built on top of the same set of elements, and adapted to other contexts? How might donors and practitioners in other contexts do this individually and in collaboration with others?
- 8) Are there ways in which global actors might learn from and adapt the grantcraft approaches On Nigeria deployed? What would that look like in other contexts?
- 9) What more do we need to know about the factors that influence the durability and sustainability of anticorruption programming and results to achieve results that are resilient in different contexts?
- 10) What is needed to build even more inclusive accountability networks, and how might organizations do so, based on the experience of On Nigeria?

Annexes

Annex 1. Glossary

Accountability: the extent to which ecosystem actors systematically leverage informal and formal institutional processes to demand accountability and hold corrupt actors to account for their actions.

Accountability bodies: Accountability bodies are Nigerian government bodies that have the power to issue sanctions to other government or judicial actors, including the powers to censure/reprimand, suspend, or remove (or recommend the removal of) the actor from office, among other powers. The accountability bodies that were particular foci of On Nigeria 2.0 include the National Judicial Council, the Code of Conduct Bureau, and the Code of Conduct Tribunal.

Accountability ecosystem: the dynamic relationships between, and practices and functions undertaken by, a diverse set of anticorruption actors representing civil society, the media, communities, and government. The accountability ecosystem includes formal organizations as well as individual actors and champions from all sectors of society (public, private, and civil), who collaborate and draw on the infrastructure provided by laws, policies, programs, and norms.

Accountability mechanisms: Accountability mechanisms are based on previous grantee work and include legislative hearings, investigative panels/judicial inquiries, emerging developments such as transparency guidelines/frameworks developed by Independent Corrupt Practices and other related offences Commission (ICPC) for COVID-19 spending, as well as new grantee commitments such as SERVICOM.

Administration of Criminal Justice Act & Administration of Criminal Justice Laws (ACJA/Ls): Passed in 2015, the Administration of Criminal Justice Act (ACJA) is a federal law in Nigeria that mandates clear and improved criminal procedure across the federation. Because Nigeria operates a federal system, criminal justice is largely a state responsibility, and federal laws like the ACJA apply only to federal courts. To implement its reforms nationwide, each state must enact its own Administration of Criminal Justice Law (ACJL), adapting the federal framework to its jurisdiction.

Administration of Criminal Justice Monitoring Committees (ACJMCs): Federal- and state-level bodies that monitor the criminal justice sector's compliance with and implementation of the ACJA (federal) or state-level ACJ/Ls.

Anticorruption agencies: Nigerian government bodies that have the express purpose of investigating, prosecuting, or punishing cases of corruption, or in initiating anticorruption policy reforms or programs; in total there are 26 ACAs in Nigeria. Key anticorruption agencies include the Nigeria Financial Intelligence Unit, the Economic and Financial Crimes Commission (EFCC), the Technical Unit on Governance and Anti-Corruption Reforms, the Presidential Committee Against Corruption, the Office of the Auditor General for the Federation and the ICPC.

Anticorruption laws: Laws that criminalize corrupt acts such as money laundering or protect actions that counter corruption, such as whistleblowing. In most cases, one or more anticorruption agency is responsible for enforcing the law. Key anticorruption laws include the Freedom of Information Act, the Procurement Act, and legislation related to proceeds

management, beneficial ownership, and whistleblowing. In some cases, anticorruption laws are also governing laws, depending on what is included in their provisions.

Civic space: According to CIVICUS Monitor, civic space describes a state's duty to protect its citizens and to respect and facilitate their fundamental rights to associate, assemble peacefully, and freely express views and opinions. Civic space in a country can be described as open when a government is fulfilling these duties, or closed when it is not. "Opening" or "closing" would refer to a trend towards one of these states.

Civil society: The "third sector" of society. Alongside the government (public) and business (private) sectors and distinct from the family, civil society comprises both organized and organic types of affiliation. "Organic" types of civil society include online groups and social media communities, social movements, and social entrepreneurs. In the context of On Nigeria, Civil Society Organizations (CSOs) are formal registered entities, including non-governmental/non-profit organizations, think tanks, community-based organizations, faith-based organizations, professional associations, labor groups, and educational institutions.

Collective action: In the context of the Behavior Change module, unified action by a group of people and/or organizations, including but not limited to citizens, communities, and policymakers, against corruption.

Criminal justice actors: An umbrella term covering administrative court staff, judicial actors such as magistrates, high court judges, court of appeal judges, and supreme court judges, as well as credentialed legal actors.

Historically disadvantaged communities: Groups of people sharing a common identity characteristic that have typically been relegated to the periphery of society, and been denied full participation in political, economic, social, and cultural activities and power structures. In the Nigerian context, particular groups with a history of marginalization include women, youth, non-English speakers, persons with disabilities, residents of rural areas, the poor, and sexual and gender minorities, among many others. An individual may belong to more than one of these groups, leading to intersections of identities and marginalization. On Nigeria features a cross-cutting approach focused on advancing equity and social inclusion of historically marginalized communities; while the approach is not limited to specific groups, the strategy places particular emphasis on gender (women), geographic (rural), and generational (youth) equity and inclusion. In the Theory of Change, "historically marginalized communities" should be understood to refer to both physical (geographic) communities and social (identity) groups.

Investigative reporting: Investigative articles aim to meet the following two standards: 1) reporting investigates a single topic in-depth (i.e., examination attempts to be systematic, thorough, or from more than one perspective), typically to "uncover corruption, review government policies or corporate houses, or draw attention to social, economic, political, or cultural trends"; and, 2) reporting proactively gathers information that was not previously public, and is NOT simply a passive reaction/report on press releases, government announcements, or related content.

Nigeria's Whistleblower Policy: Approved by the Federal Executive Council in December 2016 and created by the Federal Ministry of Finance for whistleblowers, the policy provides that if the government is able to recover stolen or concealed assets based on the information provided by a whistleblower then s/he may be entitled to between 2.5%–5% of the amount recovered. This policy is not a law.

On Nigeria cohort: On Nigeria's cohort-based approach to grantmaking was intended to facilitate collaboration across grantee organizations. The cohort model includes making

grants on an aligned schedule to the organizations that work within each module, as well as convening regular cohort meetings where grantees share learning and coordinate activities and interventions. The cohort was comprised of the grantee organizations working in each module.

Participation: The extent to which a broad and diverse constellation of actors systematically participate in official and unofficial public decision-making processes, and shape the use of public resources.

Proceeds of Crime Bill: Now the Proceeds of Crime (Recovery and Management) Act, the bill was signed into law in 2022 to create a unified, transparent system for seizing and managing assets from criminal activity. The National Assembly introduced an amendment bill in 2023–2024 to address concerns raised about the centralized asset-management structure.

Sandwich Strategy: Refers to approaches which leverage the interplay between a push from below, by which citizens demand change (“voice”), and a squeeze from above to encourage public and private institutions to develop and enforce laws and regulations (“teeth”).

Social Accountability: Refers to the extent and capacity of citizens to hold the state and service providers accountable and make them responsive to the needs of citizens and beneficiaries.

“Teeth” actors: Public institutions and agencies, government officials, policymakers, decisionmakers, and other high-level actors that develop and enforce laws and regulations, including by implementing systems for transparency, monitoring compliance, and using incentives to discourage corruption and sanctions to punish it.

Transparency: The extent to which institutions and agencies are systematically transparent about their actions, the use of public resources, and decision-making.

“Voice” actors: Members of civil society demanding accountability, advocating for reforms, engaging citizens in anticorruption issues, monitoring public projects and legal compliance, and/or publishing more reporting on corruption and anticorruption issues.

Yahoo Boys: People, typically young men, who commit fraud on the internet.

Annex 2. Detailed Methods

The final evaluation leveraged four distinct methods: 1) social network analysis, 2) case studies, 3) literature review, and 4) Delphi technique to collect and analyze data for this evaluation. This annex provides a comprehensive description of each of the methods and phases for this evaluation.

Phase 1. Data Collection and Analysis

#1. SNA



The endline social network analysis (SNA) is based on two SNA surveys and a set of Focus Group Discussions (FGDs) with actors in the accountability ecosystem (grantees and non-grantees). In October 2024, the Evaluation and Learning Partner (EL Partner) held a workshop in Abuja, Nigeria with all On Nigeria grantees for the final annual, in-person learning event of On Nigeria 2.0. Grantees represented all four cohorts (Behavior Change, Criminal Justice, Joinbodi, and Media and Journalism). Each grantee in attendance completed a survey, in which they identified their primary partners, and in November 2024, the EL Partner followed up with each grantee via online survey to identify additional partner relationships. In January 2025, the EL Partner sent a survey to non-grantee organizations that were identified by grantees as connections to develop a more robust network and to learn from organizations in the accountability ecosystem, but that are also outside of the grantee network.

The SNA sample included 172 organizations of which 63 were On Nigeria grantees and 109 were non-grantees. The types of organizations and cohorts that they represented are detailed in the exhibit below.

Exhibit 16. Organizations in the SNA

Types of Organizations	
International NGO	8% (14)
MDA	22% (37)
NGO	54% (93)
Private Business	16% (28)
Organizations by Cohort	
Behavior Change	10% (7)
Criminal Justice	5% (8)
Joinbodi	13% (22)
Media and Journalism	9% (16)
Non-grantee	65% (109)

To clean, analyze, and visualize the endline network data, the EL Partner used the R programming language. To provide additional context around the network statistics, the EL Partner employed a Monte Carlo simulation approach to generate 1,000 similar networks based on the actual network density and the actual number of connections. This provides a point of comparison for the actual network's network statistics. Exhibit 16 provides a snapshot of the SNA organizations.

The survey was supplemented with six FGDs with grantees (4 FGDs) and non-grantees (2 FGDs) in February 2025. Respondents all represented voice actors and were primarily from NGOs. There was one International NGO represented in the Criminal Justice FGD, six participants represented private businesses (primarily media organizations), and one

government entity was represented in the Joinbodi session. In terms of geography, fourteen participants' organizations were based in the Federal Capital Territory (FCT), nine were based in Lagos, two were from Kano, and one each were from Kaduna, Kwara, Plateau, and Akwa Ibom. Six respondents were female, while the rest were male. Finally, the cohort breakdown was: four Criminal Justice grantees, eight Joinbodi grantees, seven Media and Journalism grantees, four Behavior Change grantees, and six non-grantees. The FGDs were all conducted remotely over Zoom, and the transcripts were analyzed using the artificial intelligence-supported analysis platform, CoLoop.

#2. Case Studies



A total of 15 case studies were conducted—nine in 2023 and 2024 and six in 2025. The first nine case studies consisted of 37 interviews and reviewing 77 documents, a podcast, and a radio episode.

The six new cases were selected from success stories submitted by grantees before and during the annual grantee learning event in October 2024. Cases were coded against a set of pre-determined criteria to identify those that reflected the work carried out under On Nigeria, based on the strength and level of the TOC to which they contributed. Selection also ensured diversity across cohort, region, and the degree of gender equity and social inclusion (GESI) integration.

Following selection, the EL Partner collected background documents through internet searches, grantee websites, PartnersUnited, media monitoring data, and submissions from the Program Team and grantees. These documents were reviewed, coded, and analyzed to build a foundational understanding of each case, which informed both the selection of key informant interview (KII) respondents and the design of tailored KII guides for different respondent types. Key informants included grantee staff, partners, and intervention participants or beneficiaries. In total, 78 documents were reviewed, and 55 KIIs were conducted across the six new cases.

KII transcripts were cleaned using CoLoop.ai, with additional review by EL Partner team members. Transcripts were then coded in Dedoose. The team used CoLoop.ai to analyze segments within each code and identify emerging themes, ensuring artificial intelligence-supported thematic analysis was supervised and validated by human analysts.

In addition to the case studies, a cross-case survey was conducted to broaden understanding of anticorruption perceptions among those directly and indirectly involved in On Nigeria. Respondents were purposively sampled and included grantees from all 15 cases, participants from the SNA survey, and additional partners, program participants, and beneficiaries. Six additional grantee organizations, whose work aligned with the On Nigeria theory of change (TOC) but were not part of the 15 case studies, were also invited to participate. A total of 143 individuals responded to the survey.

To assess broader perceptions of corruption and the effectiveness of anticorruption efforts since 2020, the EL Partner analysed both quantitative and qualitative survey data. Quantitative data were analysed using R, focusing on descriptive statistics and demographic disaggregation to identify patterns across respondent groups. For the qualitative data, open-ended responses and audio submissions (transcribed using CoLoop.ai and Turboscribe.ai, and translated from local languages by a consultant) were initially coded in Excel. Thematic analysis was then enhanced through CoLoop.ai tools to deepen insights and triangulate findings.

#3. Literature Review



The Literature Review component involved collecting and analyzing two categories of documents: program-focused literature, which examined On Nigeria 2.0 programming through grantee activities, outcomes, and results; and context-focused literature, which provided insights into the broader landscape of corruption and social accountability in Nigeria.

To gather program-focused literature, the EL Partner accessed proposals, reports, and other program documents from TheLoop, conducted internet searches, and requested additional materials from all grantees. Past learning briefs were also included. For context-focused literature, the EL Partner collaborated with the Program Team to co-create a list of relevant websites, solicited documents from both the Program Team and the Reference Group, and conducted additional searches via Google and the USAID Development Experience Clearinghouse.

In total, 488 program-focused and 133 context-focused documents were analyzed. Using AILyze, the EL Partner grouped the program-focused documents by grantee cohort to identify emerging themes aligned with components of the On Nigeria TOC. Context-focused documents were organized by year. As with the case study KII analysis, a combination of artificial intelligence tools and researcher review was used to validate artificial intelligence-identified themes and uncover new ones.

#4. Delphi Panel



The Delphi survey was administered to a panel of 12 recognized experts of Nigeria's accountability ecosystem and consisted of two consecutive surveys. The experts were identified by the MacArthur Foundation Program Team and the EL Partner (including Nigerian team members) using a set of pre-determined criteria. The selected panel was made up of six males and six females, including one person with disabilities, from a variety of sectors. The EL Partner also categorized the respondents into groups based on their level of knowledge of the MacArthur Foundation and the On Nigeria Program. The following exhibit shows how respondents were divided across the three groups with Group 1 having the least familiarity and Group 3 having the most familiarity.

Exhibit 17. Delphi Survey Respondents by Group

Category	Number of Respondents	Selected Level of knowledge with the MacArthur Foundation and the On Nigeria Program
Group 1	3	"I am not familiar with the MacArthur Foundation." "I am not familiar with the On Nigeria program and have not worked with the MacArthur Foundation."
Group 2	3	"I am not familiar with the On Nigeria Program but have been engaged with the MacArthur Foundation on other activities." "I work for an organization that did/does not directly engage with On Nigeria grantee(s), but I am aware of the On Nigeria program."
Group 3	6	"I work or have worked for an organization that engaged directly with On Nigeria grantee(s) but did not receive a grant itself." "I work or have worked for an organization has received an On Nigeria grant in the past."

The first survey was conducted in mid-April 2025, and the second survey was conducted in late May 2025. Panelists responded to a survey, in which they were asked to rate their level of agreement with 16 statements about the status of the accountability ecosystem in Nigeria, and more broadly, transparency, participation, and accountability. For each statement, panelists assessed their level of confidence in their agreement rating and explained their answer. EL

Partner team members analyzed and synthesized the first round of responses, then sent each panel member a report that highlighted their quantitative and qualitative responses and anonymized quantitative responses for all other panelists, as well as a summary of the panel's qualitative response. Panelists then took the survey a second time.

The EL Partner synthesized the findings to understand how the overall group responded, how males and females responded, and how level of knowledge of the MacArthur Foundation and On Nigeria affected responses.

Phase 2. Synthesis

During a structured series of internal Data Analysis, Integration, and Synthesis sessions, the EL Partner:

- Reviewed and integrated themes and emerging findings from the four evaluation methods
- Applied portfolio-level rubrics to assess how and to what extent desired outcomes in the On Nigeria TOC have evolved since 2020, and drafted briefing notes to summarize these changes
- Assessed key factors that facilitated or hindered progress
- Identified the mechanisms through which observed outcomes emerged

The EL Partner engaged Reference Group members to gather feedback and questions on the draft findings and began co-creating conclusions. Following the Reference Group meeting, the EL Partner revised the findings as needed and drafted initial conclusion statements. The Program Team—via another participatory sensemaking session—reviewed and provided feedback on these materials, after which the EL Partner conducted another round of revisions to reflect collected inputs.

Phase 3. Participatory Sensemaking

In August 2025, together with the Program Team, the EL Partner convened a one-day, in-person workshop in Abuja, inviting representatives from each On Nigeria cohort and a Reference Group member based in Abuja. Participants were asked to review the draft evaluation findings and conclusions in advance.

During the workshop, the EL Partner facilitated a futures-thinking-informed exercise to consider what more is needed to strengthen Nigeria's accountability ecosystem, and sustain On Nigeria's results, based on evaluation evidence. Following the workshop, the EL Partner synthesized participants' reflections and integrated their thinking into the findings and considerations presented in this report.

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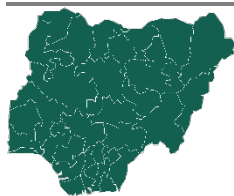
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Annex 4. 2025 Case Study Summaries

CASE: Accountability Lab



STATES

Integrity Icons receives nominations from 30–35 states

Integrity Hubs are geographically grouped:

- *Northeastern Nigeria: Covering states like Gombe and Adamawa.*
- *North Central Region: Including Abuja, Nasarawa, Kaduna, and Kogi states.*
- *Southern Nigeria: Encompassing the southeast, west, and south-south regions*



PARTICIPANTS ENGAGED

Public servants and staff at ministries, departments, and agencies and youth.



GOALS: To transform public perception of public service and inspire others in public service to uphold similar ethical standards, foster collaboration and promote accountability and integrity within public institutions, and empower young changemakers (Accountapreneurs) to advance initiatives that promote transparency, integrity, and community development at the grassroots level across Nigeria.

ACTIVITIES:

- **Integrity Icon Awards:** workers throughout government ministries, departments, and agencies submit nominees for “Integrity Icons” to honor public servants working with accountability and integrity at the forefront of their roles. The five annual winners are honored through “naming and faming” in news articles, documentaries, and an awards ceremony.
- **Integrity Innovation Lab:** An annual forum where Integrity Icons connect with other public servants, share experiences, and explore ways to sustain and expand their integrity-driven initiatives.
- **Integrity Hubs:** Regional networks that bring together icons and other public servants on a regular basis to discuss integrity challenges and practical solutions in their workplaces.
- **Accountability Incubator:** A program that supports young changemakers (“Accountapreneurs”) with training on non-governmental organization (NGO) startup and management, funding, and monitoring and evaluation, as well as provide mentorship, seed funding, and networking opportunities to turn their community development ideas into action and incorporate anticorruption messaging for dissemination at the grassroots level.
- **Support on National Ethics and Integrity Policy and Code of Conduct:** Accountability Lab Nigeria supported ministries, departments and agencies to raise awareness of the National Ethics and Integrity Policy and Code of Conduct by simplifying materials and distributing them widely among government workers



PARTNER ORGANIZATIONS REPRESENTED

Independent Corrupt Practices and Other Related Offences Commission (ICPC): Nigeria’s anticorruption agency established in 2000 to combat, prevent, and prosecute corruption in public institutions, supported Accountability Lab’s Integrity Icon campaign by amplifying campaign messages and promoting recognized public servants as “Integrity Icons.” Through its platforms and networks, the ICPC helped enhance the campaign’s visibility and credibility nationwide.

Bureau of Public Service Reforms): A federal agency responsible for public service reforms, collaborated with Accountability Lab on the National Ethics and Integrity Policy and Code of Conduct by providing legal experts (lawyers and judges) to review and strengthen the policies. The agency also supported dissemination through QR codes and printed copies. Additionally, the Bureau supported the Integrity Innovation Lab, contributing to the advancement of integrity-driven reforms, though the specific nature of this support was not elaborated upon.

The Service Compact with All Nigerians (SERVICOM): A government program established to improve service delivery across Ministries, Departments, and Agencies by promoting efficiency, accountability, and citizen satisfaction.

The Technical Unit on Governance and Anti-Corruption Reforms: Contributes to governance and anticorruption initiatives through research, diagnostics, monitoring, and policy development.

Step Up Nigeria: Another On Nigeria 2.0 grantee, a civil society organization, works to build trust between citizens and government, promote integrity, and combat corruption through education and storytelling.

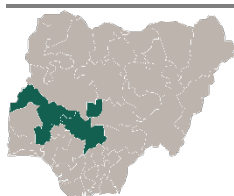
The Aig-Imoukhuede Foundation: A philanthropic organization focused on transforming public service delivery and strengthening leadership capacity, supports governance reform efforts across Nigeria and Africa.

Lux Terra Leadership Foundation: Another On Nigeria 2.0 Joinbodi grantee, provides leadership training, advocacy, and capacity-building programs that promote ethical governance and servant leadership.

Agora Policy: A Nigerian think tank that conducts research, facilitates dialogue, and promotes evidence-based policymaking to improve governance outcomes.

Policy Innovation Centre: The first institutionalized behavioral insights initiative in Nigeria works with public and private institutions to design and implement evidence-based, behaviorally informed policies and programs.

CASE: Al-Habibiyyah Islamic Society



GOALS: To reduce corruption among the Muslim population in Nigeria by promoting integrity, accountability, and economic independence through faith-based and community-driven approaches.

STATES

Multiple locations in Nigeria, including states such as Kogi, Kwara, Osun, and Abuja (FCT).



PARTICIPANTS ENGAGED

Citizens, community-based organizations (CBOs), legal professionals, youth groups and associations, women's groups, Community Development Committees, and leaders such as community chiefs, heads of towns, and traditional leaders.

ACTIVITIES:

- **Entrepreneurial Training for Imams:** Capacity-building sessions that equipped Imams with practical business and entrepreneurship skills to support their financial independence and community leadership.
 - **Sermon Guides for Imams:** Development of and training on tools and reference materials to help Imams prepare sermons on accountability and anticorruption, grounded in relevant scriptural teachings.
 - **Digital Youth Skills Program:** Training for young people focused on digital literacy and income-generating skills to enhance employment and entrepreneurship opportunities to reduce economic hardship enabling them to resist temptation to participate in corruption for income.
 - **Teenagers' Workshop:** Practical workshops where teenagers learned marketable skills—such as cooking, digital design, and box making—combined with lessons on accountability and anticorruption.
 - **“Just Radio” Program:** A public sensitization and call-in radio show that engaged broader audiences on issues of corruption, transparency, and good governance.
 - **Sensitization Sessions for Men and Women:** Gender-specific learning sessions addressing the nature, causes, and impacts of corruption, while promoting accountability and ethical behavior.
-

- **Ramadan Tafsir:** Quranic interpretation sessions held during Ramadan that explored the relationship between faith, corruption, and accountability.
- **Ramadan Unity Lecture:** A community lecture series fostering unity and shared moral reflection during Ramadan, with a focus on integrity and civic responsibility.
- **Intergenerational Dialogues:** Forums bringing together elders and youth to exchange experiences and perspectives on governance, ethics, and social accountability.
- **Sensitization Sessions for Men and Women:** Gender-specific learning sessions addressing the nature, causes, and impacts of corruption, while promoting accountability



PARTNER ORGANIZATIONS REPRESENTED

Islamic, Women's, and Christian Organizations: Supported recruiting participants from various social groups such as different Islamic sects, women, youth, and Christians. These organizations included Supreme Council for Islamic Affairs, Jama'atu Izalatil Bid'ah Wa Iqamatis Sunnah, Ansar-Ud-Deen Society, Jama'atu Nasril Islam, Federation of Muslim Women's Associations in Nigeria, Muslim Students Society, Christian Association of Nigeria, and Women and Youth Christian Association of Nigeria.

Anticorruption Agencies: Served as resource persons to educate people on corruption and accountability. These organizations included: EFCC, ICPC, National Orientation Agency, National Agency for the Prohibition of Trafficking in Persons, Legal Aid Council, Code of Conduct Tribunal, Nigeria Police Force, Department of State Services, Independent National Electoral Commission.

Human Rights Radio: Broadcasts the "Just Radio Program", promoting justice and accountability through public engagement.

Small and Medium Enterprises Development Agency of Nigeria, National Directorate for Employment, and All Farmers Association of Nigeria: Supported entrepreneurial training by teaching small business and farming skills.

JAIZ Bank and Keystone Bank: Provided financial support for imams to support income generation.

CASE: Centre for Media Policy and Accountability (CMPA)



STATES

While the project activities are national in scope, the key location for project activities is Abuja.



PARTICIPANTS ENGAGED

Anticorruption agencies, CSOs, and media organizations.



GOALS: To improve transparency, accountability, and effectiveness in fighting corruption by equipping anticorruption agencies with the necessary platforms and skills to report their activities in a way that the public could understand and consume.

By strengthening the reporting and communication of anticorruption efforts, it aims to impact Nigeria's performance in international benchmarks positively.

ACTIVITIES:

- **Training and Capacity Building:** A core component of the project focused on building the capacity of key stakeholders through targeted training sessions and workshops.
- **Advocacy visits and outreach to anticorruption agencies:** To build collaboration and gather institutional feedback. The project prioritized high-level advocacy to foster stakeholder buy-in and ensure continued support for project objectives.

- **Collaborative Meetings and Dialogues:** To facilitate knowledge exchange and stakeholder alignment, the project organized a series of dialogues and meetings, thereby facilitating synergy among stakeholders such as anticorruption agencies, CSOs, and media.
- **Research:** Conducted to evaluate the reporting methods of anticorruption performance, identifying complications and inconsistencies in how agencies reported figures.
- **Reporting Templates and Tools:** Developed to support standardization of reporting practices to ensure consistency and comparability across agencies.
- **National Dialogue:** Bridging the gap between anticorruption efforts and public perception through improved communication



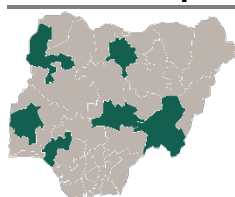
PARTNER ORGANIZATIONS REPRESENTED

Anticorruption Agencies: The EFCC, the ICPC, and Code of Conduct Bureau. These agencies were involved in training, dialogue activities, and policy development discussions. Other associated agencies participated in events and training sessions organized by the project.

CSOs: CSOs collaborated in research, advocacy, and training activities and fostered collaboration and understanding between journalists and anticorruption agencies. Partners included the Centre for Fiscal Responsibility, Integrity Watch, Centre for Democracy and Development, Civil Society Legislative Advocacy Centre (CISLAC), Centre for Fiscal Transparency and Public Integrity, the International Centre for Investigative Reporting and Daily Trust Foundation.

Media Organizations: Supported the project to disseminate information and raise public awareness about anticorruption efforts. Key media partners engaged included Leadership, Channels TV, The Punch, Guardian Newspapers, Arise TV, Premium Times, The Cable, The Punch Newspapers, The Daily Trust, NTA, Radio Nigeria, among other media organizations. Also engaged is the News Agency of Nigeria.

CASE: Independent Corrupt Practices and Other Related Offences Commission Anti-Corruption Academy of Nigeria (ICPC ACAN)



STATES

Kebbi, Nasarawa, Kano, Oyo, Ondo, and Taraba



PARTICIPANTS ENGAGED

- Chief Executive Officers
- CSOs
- Staff of Anticorruption Agencies
- Other stakeholders (not identified)



GOALS: To promote integrity, ethics, and anticorruption practices across various sectors in Nigeria, to raise awareness about the National Ethics and Integrity Policy and ensure its principles are integrated into social and cultural behaviors, and to equip stakeholders with the knowledge and tools needed to implement integrity-based interventions effectively.

ACTIVITIES:

- **Workshops and Lectures:** In-person workshops for senior executives featuring expert lectures, discussions, and case studies.
- **Policy Dialogues:** National dialogues focused on social norms and behavioral change in anticorruption.
- **Educational Materials:** Development of animated learning tools and publication of policy briefs.
- **Training of Trainers:** Capacity building for organizational representatives to replicate anticorruption training within their institutions.



PARTNER ORGANIZATIONS REPRESENTED

Anti-Corruption and Transparency Units of MDAs: Monitor compliance with anticorruption policies within MDAs. Members of these units are trained by ACAN to enhance their ability to detect, prevent, and address corruption within their respective organizations.

Brazilian Government and International Academy of Anti-Corruption: Partners in global networking

CASE: Signature Development and Media Foundation



STATES

*Oji-River Local Government
Area of Enugu State*



PARTICIPANTS ENGAGED

Market women, persons with disability, artisans, okada & Keke riders, farmers, cattle sellers, youths, school children, Faith Based Leaders, Political Office Holders, Traditional Rulers, Town Union Leaders, ethnic association etc.



GOALS: To empower grassroots communities to combat corruption by fostering awareness, accountability, and collective action and to foster a sense of local ownership of anticorruption efforts at the grassroots level while promoting sustainable community-driven solutions.

ACTIVITIES: The Corruption Tori Town Hall in Achi was part of a series of Corruption Tori town halls, each conducted as a grassroots initiative aimed at addressing local community issues. In Achi these included non-functional clinics, lack of electricity (with an unused transformer for 20 years), poor road conditions, school access challenges, and police harassment of market women. The town hall provided a platform for open dialogue between community members and local law enforcement (and potentially, local politicians), breaking down complex anticorruption concepts into accessible discussions. It focused on empowering local communities to take ownership of the anticorruption campaign while fostering accountability from leaders.

Signature Development and Media Foundation employed a comprehensive strategy to ensure the program's success. They prioritized grassroots engagement by connecting directly with ordinary people and mobilizing communities through influential local figures like traditional rulers. The approach was highly interactive, emphasizing conversations over lectures and using relatable examples to demonstrate corruption's impact on development. Inclusivity was central to the strategy, with diverse groups actively participating. Discussions were conducted in Pidgin English, Igbo, and Hausa to ensure accessibility.



PARTNER ORGANIZATIONS REPRESENTED

Traditional/community leaders/rulers: Served as anticorruption ambassadors and leaders of the local anticorruption fight, and are honored at town halls.

Governmental Agencies, Anticorruption Agencies like EFCC, ICPC, Police and Non-Governmental Agencies

CASE: Women Radio Network



STATES

National – all 36 states



PARTICIPANTS ENGAGED

Citizens, CBOs, legal professionals, youth groups and associations, women's groups, Community Development Committees, and leaders such as community chiefs, heads of towns, and traditional leaders.



GOALS: to address the lack of a unified platform for women across Nigeria, connecting grassroots and urban communities. Created under a 100% female-centric radio station, Women FM, it serves as a safe space designed by women, for women, to amplify their voices and foster meaningful connections. The initiative focuses on empowering women through media advocacy, personal and professional development opportunities, and providing a platform to share stories often overlooked in traditional media.

The Women Radio Network was strategically designed to empower and connect women in the 36 states in Nigeria across the six geopolitical zones to provide accountable solutions for protecting women and girls in communities. The Women Radio Network collaborates with CBOs to reach underserved populations. Its activities include virtual meetings, broadcasting anticorruption programs in indigenous languages. The network aims to bridge the gap between urban and grassroots women while fostering dialogue on critical issues like gender-based violence, accountability, corruption, and women's rights.

ACTIVITIES:

- **WhatsApp Platforms:** Women Radio Network created WhatsApp groups segmented by regions and states to facilitate communication among members. These platforms allowed women to share news, issues affecting them, and opportunities while fostering engagement.
- **Radio Program:** The network amplified women's voices through radio programs aired on Women FM that covered stories often ignored by traditional media. They highlighted issues such as gender-based violence, accountability, corruption, and the challenges faced by grassroots women.
- **Virtual Meetings:** The network hosted virtual meetings, like their inaugural general meeting. These meetings, which were attended by their members from different locations, provided an opportunity for members to connect and discuss shared concerns.
- **Collaborations with CBOs:** Women Radio Network partnered with 39 CBOs across six geopolitical zones in Nigeria to amplify women's voices at the grassroots level by creating platforms for dialogue, they also talk on radio about issues affecting women, and ensure their stories were heard on larger platforms.
- **Awareness Campaigns and Advocacy Programs:** through support given to organizations for 16 days of Activism: Activities included campaigns against gender-based violence and advocacy empowerment programs aimed at raising awareness about critical issues affecting women.
- **Grassroots Engagement:** The network prioritized engaging grassroots women directly through outreach efforts that bridged the gap between urban and rural communities. The network ensured that stories from grassroots communities were shared in real-time on its platform and amplified through traditional media channels like Women FM.
- **SME Mart:** Women Radio Network implemented the SME Mart a program that provided a platform exclusively for network members,

offering opportunities for business promotion and development. Through this program, the network facilitated a Radio Business Hub that featured women entrepreneurs, allowing them to showcase their businesses and gain visibility. Additionally, the SME Mart served as a space where members could connect with customers both locally and internationally through platforms like WhatsApp groups. It also provided free access to Voice of Women conferences as participants or speakers, further enhancing networking opportunities and professional growth. Regular engagement was maintained through weekly SME Mart programs on the radio and monthly newsletters, ensuring continuous support for women entrepreneurs across Nigeria.

- Women Radio Network's activities led to the creation of '**Nimi AI**', an artificial intelligence designed in response to women expressing feelings of loneliness and the need for a non-judgmental companion, providing guidance and support through radio programs and online platform.



PARTNER ORGANIZATIONS REPRESENTED

CBOs: Amplified Women Radio Network's presence within communities. They encouraged women to join the network, organized events and activities for their members, and supported advocacy efforts as well as community engagement activities. They also engaged in activities commemorating 16 days of activism, supported by the network.

Health practitioners: Offered free medical consultations to its members. They also participated in radio programs to provide health advice and support women's health initiatives.

NGOs (e.g., Women in Management, Business, and Public Service, Nigerian Women Trust Fund, Vision Spring Initiatives): Partnered with Women Radio Network to support women's empowerment initiatives and promote information about the network on their platforms to draw in members. For example, the network shared links to their resources with Women in Management, Business, and Public Service members, thereby expanding the reach of Women Radio Network's programs and fostering connections among women in business and leadership roles.

Lotus Bank: Supported a physical training session for Women Radio Network members, contributing resources that facilitated skill development among participants.

Annex 5. Rubrics

In-Case Analysis

Method #2 explored a total of 15 cases; six new, plus the nine cases that already feature in the *Case Study Analysis* reports produced by the EL Partner since 2021. The evidence from the nine cases was re-analyzed for the final evaluation.

The EL Partner applied the rubric presented in Exhibit 18 to each of the 15 cases. The rubric uses the [Response, Responsiveness, and Responsive Accountability logic](#) developed by Fox, McGee, et. al, as a jumping off point for an analytical framework. This framework, built into the rubric itself, reflects the underlying logic of many of the projects supported by On Nigeria grantmaking, and echoes the thinking in cohort-level theories of change, in which grantees seek to build the capacity of other ecosystem actors to take action to demand and eventually, obtain accountability.

For each case, the EL Partner:

1. Assessed where on the rubric the case began
2. Assessed where the case ended
3. Evaluated the level of change between start to end

For each start and end point, the EL Partner assessed the quality of the underlying evidence, to clarify the confidence level regarding the identified levels of change. This temporal analysis helped clarify the level of change that occurred, assess On Nigeria's contribution to and/or mitigation of observed changes, and support identification of the contextual factors and causal mechanisms that contributed to observed changes (positive or negative) at case level.

Exhibit 18. Within Case Analysis Rubric

Minimal and/or Restricted Anticorruption Engagement/Action (0)	Limited Anticorruption Engagement/Action (1)	Emerging Anticorruption Engagement/Action (2)	Preliminary Government Response (3)	Government Responsiveness (4)	Accountable Responsiveness (5)
<p>The case meets AT LEAST TWO of the following conditions:</p> <p>1) There is little evidence of engagement or action to reject corruption and/or improve accountability in the target context/sector</p> <p>2) Government officials and/or authority figures actively restrict or prevent anticorruption engagement and/or action in the target context/sector</p> <p>3) Corruption and/or malfeasance are widespread in the target context/sector</p>	<p>The case meets BOTH of the following conditions:</p> <p>1) There is some evidence of limited engagement or action to reject corruption and/or improve accountability in the target sector</p> <p>AND</p> <p>2) The number and type of actors involved in such work is quite constrained, while openings for broadening and/or deepening engagement/action remain limited</p>	<p>The case meets BOTH of the following conditions:</p> <p>1) There is strong evidence of at least some anticorruption engagement/action within the target context/sector</p> <p>AND</p> <p>2) There is some evidence of emerging openings for broadening and/or deepening additional engagement and action in the target context/sector</p>	<p>The case meets ONE OR MORE of the following conditions.</p> <p>In response to anticorruption engagement/action, there is evidence of:</p> <p>1) One-off, verbal responses on the part of one or more government officials (acknowledging or speaking about complaints/problems in a public forum or official capacity)</p> <p>AND/OR</p> <p>2) Promises for action and redress, made by authorities relevant to the target issue, that have not yet been delivered</p> <p>AND/OR</p> <p>3) Discussion/debate relevant to the target issue in official government fora, spaces, and/or documents, indicating that the issue is not being ignored or sidelined</p>	<p>The case meets ONE OR MORE of the following conditions.</p> <p>There is evidence of:</p> <p>1) Promises of change that were actually kept / delivered on by government officials and/or the answerable authorities (such as investigations, the resolution of a particular issue, application of sanctions, one-off prosecutions, etc.)</p> <p>2) Sustained access to decisionmakers and/or officials to share and/or voice citizen concerns beyond the target issue.</p> <p>"Sustained" will be defined in the context of each case, but must persist beyond the term of an initial complaint or issue, and at least suggest durable changes in the responsiveness and/or answerability of government institutions or officials.</p>	<p>The case meets ONE OR MORE of the following conditions.</p> <p>There is evidence of:</p> <p>1) The consistent conviction and punishment of multiple corrupt actors over time</p> <p>2) Institutional reforms to address the root causes of identified corruption problems in the target context/sector</p> <p>3) Changes in power sharing agreements and/or practices, such that citizens and CSOs are not just accessing decision-making spaces, but actually influencing the decisions made in the target context/sector on a regular basis.</p>
<p>Confidence Levels (to be applied to each selected score for each case)</p> <p>HIGH: Across all sources and data streams, the evidence consistently supports the selected score.</p> <p>MEDIUM: The evidence on the selected score is mixed, with either different datastreams and/or sources within the same datastream diverging.</p> <p>LOW: Limited or anecdotal evidence on the selected score.</p>					

Portfolio-Level Rubrics

During the *Synthesis* phase of the Final Evaluation, the EL Partner reviewed, integrated, and synthesized evidence from *Methods #1–4* (Annex 1). As part of the integration and synthesis process, the EL Partner used the rubrics included in Tables 4–6 to assess progress towards key outcomes in the On Nigeria 2.0 TOC and whether/how On Nigeria contributed towards progress.

The rubrics are organized by the level of the TOC to which they correspond. Each rubric is broken down to assess progress—from Considerable Decline to Strong Gains—against the different components at each outcome level. Throughout, “No Change” scores reflect the state of each component in 2020, at the beginning of On Nigeria 2.0.

The rubrics are grounded in the logic, definitions, and expectations regarding success by 2024 outlined in the On Nigeria 2.0 TOC. The focus and intended use of each rubric is summarized and presented below.

The Accountability Ecosystem

Overview

This rubric focuses on the accountability ecosystem (the “trunk” of the TOC). On Nigeria sought to contribute to the emergence of a strong accountability ecosystem that was diverse, collaborative, coordinated, resilient and adaptive, and demonstrated aspects of institutionalization and the ability to scale promising interventions across geographies and levels of governance.

The EL Partner used Exhibit 19 to explore whether and how key elements of the accountability ecosystem have shifted in the period 2020–2024, due to contributions from On Nigeria.

2024 Expectations

By the end of 2024, the program expected concrete progress and momentum towards this outcome.

Components

The On Nigeria TOC sets out several components that are fundamental to a strong accountability ecosystem. These components, which have been adapted slightly from their original articulation in the TOC to reflect the experience of On Nigeria since 2020, are:

- **Diversity:** the breadth and number of actors, organization types, and historically disadvantaged groups engaged in the ecosystem at different levels and in different sectors
- **Collaboration & coordination:** the extent to which different actors are proactively working together to design and implement complementary anticorruption strategies, actions, and programming to reduce overlap and duplication and improve overall effectiveness throughout the ecosystem
- **Adaptive resilience:** the extent to which ecosystem actors are regularly learning and adapting to emerging changes in context and evidence, individually and collectively
- **Institutionalization:** the extent to which ecosystem actors’ work will endure beyond 2024
- **Scale:** the extent to which ecosystem actors’ work has been taken up and/or scaled in other geographies and sectors

The Accountability Ecosystem rubric is framed around these components, and for each, explains the conditions and criteria by which the EL Partner assessed the extent of progress. On Nigeria’s approaches—Skill-building, Collaboration, and GESI—were used to articulate On Nigeria’s efforts as the rubric was applied.

The scores in the rubric are built out (both to right and left) from the *No Change* middle category which, as stated, represents what the situation was in 2020.

Exhibit 19. On Nigeria's Contributions to the Strength of the Accountability Ecosystem since 2020

Acc. Ecosystem Elements	Considerable Decline without ON Mitigation (0)	Slight Decline with ON Mitigation (1)	No Change Relative to 2020 (2)	Slight Gain with ON Contribution (3)	Strong Gains with ON Contribution (4)
Collaboration	<p>The vast majority of ecosystem actors work individually, and rarely engage others in developing a common purpose or goals, or collective design and implementation. Strategic coordination of accountability strategies is rare. Even communication between ecosystem actors is the exception to the rule.</p>	<p>Few ecosystem actors actively share a common purpose and goals, and collectively owned anticorruption initiatives—though present—are mostly localized to specific sectors and/or geographies. Overlap and duplication are common, and though some horizontal, vertical, and diagonal accountability strategies are apparently, only rarely are they mutually reinforcing. Most ecosystem actors work individually, though they may occasionally communicate with others about their work.</p> <p>On Nigeria's efforts have contributed to the evident collaborations, but not enough to head off an overall decline.</p>	<p>Some ecosystem actors from various sectors and geographies share a common purpose and goals and coordinate their work on accountability to reduce overlap, duplication, and strengthen overall effectiveness, while deploying a range of complementary horizontal, vertical, and diagonal accountability strategies. Many others collaborate only rarely, operate in siloes, and do not systematically develop and implement initiatives with partners.</p> <p>On Nigeria's efforts to strengthen collaboration have contributed to holding off declines in the collaborative capacity of the ecosystem as a whole.</p>	<p>Many ecosystem actors work across sectors and geographies to develop shared purpose and goals and engage in collectively owned initiatives to reduce overlap and duplication, while leveraging a range of mutually reinforcing horizontal, vertical, and diagonal accountability strategies to strengthen the overall effectiveness of their efforts to tackle corruption. The majority of these initiatives are still nascent or in their early stages, but there are at least a few examples of emerging cross-organization, sector, and/or geographical coordination.</p> <p>On Nigeria's efforts to strengthen collaboration have contributed to emerging collaborative initiatives.</p>	<p>Most ecosystem actors work across sectors and geographies to develop shared purpose and goals and engage in strategically coordinated and mutually reinforcing collectively owned initiatives to tackle corruption. Many of these initiatives are well-established, and set up for success in the future, with many robust examples of cross-organization, sector, and geographical coordination.</p> <p>On Nigeria's efforts have contributed to laying the foundation for these strong collaborations.</p>
Diversity	<p>The number and type of actors involved in the accountability ecosystem has fallen considerably, and is restricted to a relatively small number of civil society organizations and established NGOs organizations funded by international donors.</p>	<p>The number and type of actors involved in the accountability ecosystem has fallen slightly. The majority of ecosystem actors are part of civil society organizations and established NGOs. Other actors—from government, the private sector, communities, the media, and historically disadvantaged groups—occasionally participate in but do</p>	<p>Some actors are engaged in accountability work at community, state, and/or federal levels, but most are part of civil society organizations and NGOs, as well as federal level government officials. Other actors – representing subnational governments, the private sector, communities,</p>	<p>Many actors from different types of organizations (civil society, government, etc.), levels (federal, state, and community), and groups (including historically disadvantaged groups) are actively engaged in the accountability ecosystem. Civil society organizations, NGOs, and federal government officials lead many accountability initiatives,</p>	<p>Many actors from a variety of types of organizations, levels, groups, and sectors are actively engaged in the accountability ecosystem. Civil society organizations, new and established NGOs, government officials, the private sector, communities, the media, and historically</p>

Acc. Ecosystem Elements	Considerable Decline without ON Mitigation (0)	Slight Decline with ON Mitigation (1)	No Change Relative to 2020 (2)	Slight Gain with ON Contribution (3)	Strong Gains with ON Contribution (4)
	Other actors—government, private sector, communities, the media, and historically disadvantaged groups—are not visible or active members of the ecosystem.	not typically support anticorruption work. On Nigeria efforts have contributed to diversity and numbers, but not enough to head off an overall decline.	the media, and historically disadvantaged groups – occasionally participate in and consistently support anticorruption work, even if they are not always directly engaged. On Nigeria's efforts have contributed to holding off declines in the diversity of the ecosystem.	but other actors representing a combination of subnational governments, the private sector, communities, the media, and/or historically disadvantaged groups are directly engaged in and advancing anticorruption work in some cases. On Nigeria's efforts have contributed to emerging diversity gains.	disadvantaged groups are all active participants in anticorruption work, and regularly work together to advance a social accountability agenda. On Nigeria's efforts have contributed to this expanded diversity.
Adaptive Resilience	Systematic learning and adaptation are largely absent from the accountability ecosystem. The vast majority of ecosystem actors: do not adapt to context changes or emerging evidence, or have staff focused on MEL. Examples of lessons learned being applied to action are rare.	A small number of ecosystem actors sometimes apply an iterative approach to their work on corruption, and collect and use data on an ongoing basis. The majority continue to use more traditional and linear approaches to project design and implementation, and data collection and use is weak. There are examples of learning and adaptation in the ecosystem, but they involve a relatively small number of actors. On Nigeria's efforts to strengthen adaptive resilience have helped some, but not enough to head off an overall decline the resilience of the overall ecosystem.	Some ecosystem actors regularly and systematically apply an iterative approach to their work on corruption. They collect and use evidence on an ongoing basis, identify lessons and changes in context, and adapt their strategies as they engage in work to strengthen accountability. Many actors continue to use more traditional and linear approaches to project design and implementation, and only rarely learn and adapt. On Nigeria efforts to strengthen learning and adaptation have contributed to the observed gains, and potentially held off further declines.	Many ecosystem actors regularly and systematically apply an iterative approach to their work on corruption. They collect and use evidence on an ongoing basis, identify lessons and changes in context, and adapt their strategies, while also sharing lessons learned with others. A significant portion of ecosystem actors, however, continue to use more traditional approaches. On Nigeria's efforts have played a role in the emergence of a more adaptive, resilient ecosystem of accountability actors.	Most ecosystem actors regularly and systematically apply an iterative approach to their work on corruption. They collect and use evidence on an ongoing basis, identify lessons and changes in context, and adapt their strategies, while also sharing lessons learned with others. Across the ecosystem, many actors work together to disseminate and use emerging lessons to inform programming choices. On Nigeria's efforts have contributed to this strong, adaptive, and resilient ecosystem of accountability actors.
Institutionalization	The vast majority of accountability initiatives	A small number of accountability initiatives have the long term	Some accountability initiatives and/or organizations have the	Many accountability initiatives and/or organizations have the	Most accountability initiatives and

Acc. Ecosystem Elements	Considerable Decline without ON Mitigation (0)	Slight Decline with ON Mitigation (1)	No Change Relative to 2020 (2)	Slight Gain with ON Contribution (3)	Strong Gains with ON Contribution (4)
	in the ecosystem lack the financial and/or human resources needed to endure beyond 2024. Very few projects or programs have been institutionalized, and accountability efforts are unlikely to persist past the end of On Nigeria.	financial and human resources to endure beyond 2024. The majority have yet to be institutionalized, and the overall durability of accountability efforts is doubtful. On Nigeria's efforts to institutionalize accountability programs and practices have helped to strengthen the durability of some work, but not enough to head off an overall decline.	long term financial and human resources needed to endure beyond 2024. Some initiatives may have been institutionalized, and built into existing systems or practices supported by government and/or other actors. The overall durability of accountability efforts, however, remains in question. On Nigeria's efforts to strengthen institutionalization have contributed to maintaining this steady state.	long term financial and human resources needed to endure beyond 2024. There are several examples of efforts having been institutionalized (taken up and incorporated by government partners or other accountability actors). At least a significant minority of accountability initiatives are likely to continue beyond 2024. On Nigeria's efforts to strengthen institutionalization have contributed to these emerging gains in sustainability and durability.	organizations have long term financial and human resources to endure beyond 2024. There are many examples of efforts having been institutionalized. The majority of successful accountability initiatives are likely to continue beyond 2024. On Nigeria's efforts have contributed to the institutionalization of accountability work in the country.
Scale	Very few, if any, promising accountability initiatives have been taken up by new actors or scaled horizontally or vertically.	A small number of new, promising accountability initiatives have been taken up by new actors or scaled horizontally (to new geographies and/or sectors) or vertically (to new levels of governance). The majority of such initiatives, however, remain isolated and are unlikely to be scaled. On Nigeria's efforts to support scaling have helped in some respects, but not enough to head off an overall decline.	Some promising accountability initiatives have been taken up by new actors, and/or scaled horizontally (to new geographies and/or sectors) and/or vertically (to new levels of governance). Many other initiatives remain isolated or localized. On Nigeria's efforts to support scaling have contributed to this steady state of affairs.	Many promising accountability initiatives have been taken up by new actors, and/or scaled horizontally (to new geographies and/or sectors) and/or vertically (to new levels of governance). Other promising initiatives, even if not yet taken to scale, have been shared with potential partners and backers. On Nigeria's efforts to support scaling have contributed to emerging gains.	Most promising accountability initiatives have been taken up by new actors, and/or scaled horizontally and/or vertically. On Nigeria's efforts have contributed to these scaling wins.
Confidence Levels (to be applied to each selected score) HIGH: Across all sources and data streams, the evidence consistently supports the selected score. MEDIUM: The evidence on the selected score is mixed, with either different data streams and/or sources within the same data stream diverging. LOW: Limited or anecdotal evidence on the selected score.					

Systems and Actions to Prevent, Prosecute, and Reject Corruption

Overview

This rubric focuses on the systems and actions needed to prevent, prosecute, and reject corruption (the “branches” of the TOC). On Nigeria sought to contribute to progress towards a range of practices and actions related to these outcomes, from the implementation of policies, programs, and laws that make it difficult to commit corruption, to the implementation of the ACJA/Ls, the independence of anticorruption agencies, and awareness of and action against corruption on the part of non-state actors.

The EL Partner used Exhibit 20 to measure whether and how progress towards these long-term outcomes has occurred in the period 2020–2024, due to contributions from On Nigeria.

2024 Expectations

By the end of 2024, the program expected momentum and signs of progress towards the outcomes at this level of the TOC.

Components

The components of this rubric are linked to Outcomes 3–6 in the On Nigeria 2.0 TOC, and include:

- **Prosecution and Prevention:** 1) the passage and effective implementation of the ACJA/Ls; 2) independent enforcement of corruption and criminal justice laws and policies by legal system actors and anticorruption agencies
- **Rejection:** 1) A broad swathe of Nigerians is aware of the harmful effects of corruption, and 2) state and non-state actors reject and demand accountability for corruption

The rubric is framed around these elements, and for each, explains the conditions and criteria by which the EL Partner assessed the extent of progress and On Nigeria’s contribution.

Exhibit 20. On Nigeria's Contributions to the Systems and Actors that Affect the Prosecution, Prevention, and Rejection of Corruption since 2020

PPR	Considerable Decline without ON Mitigation (0)	Slight Decline with ON Mitigation (1)	No Change Relative to 2020 (2)	Slight Gain with ON Contribution (3)	Strong Gains with ON Contribution (4)
Prevention: <i>ACJA/L passage & implementation</i>	Less than one third of Nigerian states have passed ACJ/Ls that <i>de jure</i> include the core essential elements of the ACJA. Very few, if any, ACJMCs have power or influence and there is little evidence that other essential elements are being implemented. Historically disadvantaged groups consistently suffer disproportionately in the justice system.	Fewer than half of Nigerian states have passed ACJ/Ls that <i>de jure</i> include the core essential elements of the ACJA, and/or have weakened ACJ/Ls previously passed. Some ACJMCs may be active, but they typically have little power or influence, and only a few states demonstrate implementation of other essential elements in practice. Most historically disadvantaged groups still suffer disproportionately in the justice system On Nigeria's efforts have helped to maintain some aspects of ACJ/L implementation, but not enough to hold off an overall decline in the administration of criminal justice.	More than half of Nigerian states have passed ACJ/Ls that <i>de jure</i> include the core essential elements of the ACJA. In some of these states ACJMCs are active, though evidence of other essential elements being implemented in practice may not be apparent. At least some historically disadvantaged groups in a few geographies have benefited from this work. On Nigeria's efforts have contributed to maintaining these gains, but have not advanced further progress.	At least three quarters of Nigerian states have passed ACJ/Ls that <i>de jure</i> include the core essential elements of the ACJA. In many of these states, ACJMCs are active, and there is evidence of other essential elements being implemented in practice. Many historically disadvantaged groups benefit from this work. On Nigeria's efforts have contributed to these emerging gains.	All Nigerian states have passed ACJ/Ls that comply with the core essential elements of the ACJA. The majority have operational ACJMCs that actively oversee implementation, and demonstrate the in-practice implementation of other essential elements. There is no evidence that historically disadvantaged groups are disproportionately affected by aspects of the criminal justice system. On Nigeria's efforts have contributed to these improvements in ACJA/L implementation and the administration of criminal justice.
Prosecution: <i>Independence and capacity</i>	The majority of legal system actors—police, lawyers, judges, and others—and anticorruption agencies do not investigate or prosecute corruption or other criminal violations. Corruption typically goes unpunished, and authorities are not responsive to public complaints or concerns.	Many legal system actors—police, lawyers, judges, and others—and anticorruption agencies do not effectively, independently investigate or prosecute corruption and other criminal violations, and rarely respond to public concerns. Some pockets of success exist, but these are not widespread, and do not benefit historically disadvantaged groups.	Some legal system actors—police, lawyers, judges, and others—and anticorruption agencies have the capacity to effectively, independently investigate and prosecute corruption and other criminal violations. Capacity and performance vary widely across states and stakeholder groups, but there are several compelling instances of authorities' responding to	Many legal system actors—police, lawyers, judges, and others—and anticorruption agencies have the capacity to effectively, independently investigate and prosecute corruption and other criminal violations. The number of investigations in response to complaints has improved, year on year, since 2020 in at least a significant minority of states and at the federal level.	The majority of legal system actors—police, lawyers, judges, and others—and anticorruption agencies have the capacity to effectively, independently investigate and prosecute corruption and other criminal violations. The number of successful prosecutions has improved, year on year, since 2020 in most states and at the federal level. Authorities are almost

PPR	Considerable Decline without ON Mitigation (0)	Slight Decline with ON Mitigation (1)	No Change Relative to 2020 (2)	Slight Gain with ON Contribution (3)	Strong Gains with ON Contribution (4)
		On Nigeria's efforts have helped to support these isolated successes, but have not been able to hold off an overall decline.	public concerns or complaints, including complaints voiced by or on behalf of historically disadvantaged groups. On Nigeria's efforts to strengthen the capacity of legal system actors have contributed to these gains, but not advanced further progress.	Authorities are generally, though not always, responsive to public concerns or complaints, including those shared by historically disadvantaged groups. On Nigeria's efforts have played a role in these emerging improvements.	always responsive to public concerns and complaints, including those shared by historically disadvantaged groups. On Nigeria's efforts have contributed to these improvements.
Rejection: <i>Awareness and action</i>	Very few Nigerians are exposed to media coverage, film, sermons, or other behavior change interventions that address corruption and its harmful effects, and even fewer take action to demand accountability.	Some Nigerians across sectors, geographies, and ethnicities are exposed to media coverage of corruption and its harmful effects, but show little concern for historically disadvantaged groups. Few Nigerians have been exposed to information on corruption through film, sermons, and/or other behavior change interventions, such as training for public officials. A small number of non-state actors work together to demand accountability, but these are largely one off and localized instances. On Nigeria's efforts have helped to support this work, but not enough to stave off an overall decline in corruption awareness and action.	Many Nigerians across sectors, geographies, and ethnicities are exposed to media coverage of corruption and its harmful effects, including with respect to historically disadvantaged groups. Some Nigerians have been exposed to similar information through film, sermons, and other behavior change interventions, which may include training on social norms and corruption for public officials. Some non-state actors work together to demand accountability, but these efforts are not widespread. On Nigeria's work has contributed to this steady state of affairs.	Many Nigerians across sectors, geographies, and ethnicities are exposed to media coverage of the harmful effects of corruption, including with respect to historically disadvantaged groups. Some Nigerians have been exposed to similar information through film, sermons, and other behavior change interventions, which include training on social norms and corruption for public officials. On many occasions and in many geographies, non-state actors work together to demand accountability. On Nigeria's efforts have contributed to these emerging gains.	A clear majority of Nigerians across sectors, geographies, and ethnicities are exposed to the harmful effects of corruption, including with respect to historically disadvantaged groups, while many have been exposed to similar information through film, sermons, and other behavior change interventions. Many public officials have benefited from training on social norms and corruption. Non-state actors at all levels of society and governance regularly take action to demand accountability. On Nigeria's efforts have contributed to the widespread awareness and rejection of corruption.
Confidence Levels (to be applied to each selected score) HIGH: Across all sources and data streams, the evidence consistently supports the selected score. MEDIUM: The evidence on the selected score is mixed, with either different data streams and/or sources within the same data stream diverging. LOW: Limited or anecdotal evidence on the selected score					

Transparency, Participation, and Accountability

Overview

This rubric focuses on the program's desired contribution to impacts related to transparency, participation, and accountability (the "foliage" of the TOC). As noted below, On Nigeria sought to create momentum that would eventually help strengthen transparency, participation, and accountability outcomes far into the future, beyond the end of the program. Completely achieving these outcomes by 2024 was not considered realistic.

With this in mind, this rubric is different from those presented in Exhibit 19 and Exhibit 20. Specifically, the rubric *does not seek to assess On Nigeria's contribution* to outcomes. Instead, it functions as a heuristic for describing the overall system in Nigeria with respect to TAP as of the end of 2024.

After applying this rubric to describe the system, the EL Partner used evidence from the final evaluation to inventory the ways in which On Nigeria has made small contributions to progress towards transparency, participation, and accountability outcomes, in what context, and via what mechanisms. Use of this rubric was important for exploring the implications of On Nigeria programming, and charting a direction for the future work of accountability actors in Nigeria.

2024 Expectations

By the end of 2024, the program expected signs of momentum towards transparency, participation, and accountability outcomes, with the fully realized outcomes anticipated to emerge five to ten years beyond the end of On Nigeria.

Components

The elements explored in Exhibit 21 are informed by outcomes 7–9 in the On Nigeria 2.0 TOC:

- **Transparency:** the extent to which institutions and agencies are systematically transparent about their actions, the use of public resources, and decision-making
- **Participation:** the extent to which a broad and diverse constellation of actors systematically participate in official and unofficial public decision-making processes, and shape the use of public resources
- **Accountability:** the extent to which ecosystem actors systematically leverage informal and formal institutional processes to demand accountability and hold corrupt actors to account for their actions

The TAP rubric describes each of these elements, and explains the conditions and criteria the EL Partner used to describe the state of the overall system as of the end of 2024.

Exhibit 21. The State of Transparency, Participation, and Accountability in Nigeria at the End of 2024

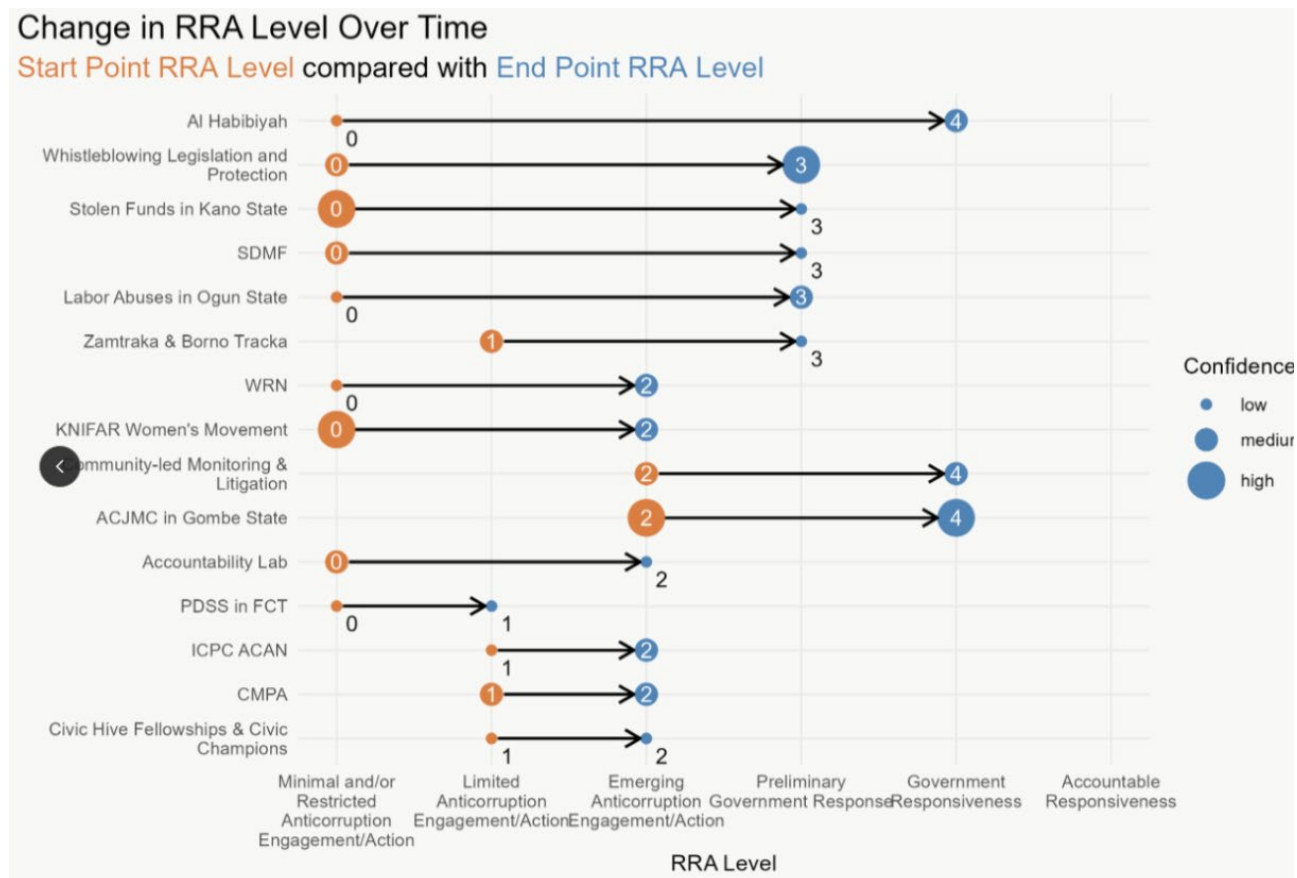
TAP Elements	Considerable Decline (0)	Slight Decline (1)	No Change Relative to 2020 (2)	Slight Gain (3)	Strong Gains (4)
Transparency	Very few government institutions and agencies at various levels (federal, state, and community) explain their decisions to the public, and public outreach almost never happens. In general, transparency is rare, and most agencies and institutions are opaque to the public, regardless of sector and level of governance.	A limited number of government institutions and agencies at various levels (federal, state, and community) explain their decisions to the public. Public outreach exists, but is uncommon. Policy and practice vary widely across sectors and level of governance, and overall transparency is quite limited.	Some government institutions and agencies at various levels (federal, state, and community) at least occasionally explain their decisions to the public, and engage in public outreach. Policy and practice vary widely across sectors and levels of governance, however, and overall levels of transparency are inconsistent.	Many government institutions and agencies at various levels (federal, state, and community) often explain their decisions to the public and engage in public outreach. More often than not, institutions and agencies across many sectors and all levels of governance are at least somewhat transparent.	The majority of government and institutions at various levels (federal, state, and community) consistently explain their decisions to the public and engage in substantive public outreach. In general, institutions and agencies across all sectors and levels of governance are transparent and accessible to the public.
Participation	Very few ecosystem actors participate in formal decision-making spaces and/or processes at any level. Public participation of any kind is rare, and historically disadvantaged groups are almost always excluded from decisions. Overall, civic space is highly restricted.	A small set of ecosystem actors may participate in formal decision-making spaces and processes at some levels (federal, state, and/or community) in some geographies. Participation rates and processes vary, and historically disadvantaged groups are particularly shut out of public decision-making spaces. In general, civic space is diminishing.	Some ecosystem actors representing civil society, government, the private sector, media organizations, and/or historically disadvantaged groups at least occasionally participate in formal and informal decision-making spaces and processes related to the use of public resources at various levels (federal, state, and community) across Nigeria. Rates and quality of participation vary widely, but there are pockets of success.	Many ecosystem actors representing civil society, government, the private sector, media organizations, and/or historically disadvantaged groups often participate in formal decision-making spaces and processes related to the use of public resources at various levels (federal, state, and community) across Nigeria. More often than not, substantive participation is a feature of the system, though many exceptions exist. Civic space appears to be growing.	A wide swathe of ecosystem actors representing civil society, government, the private sector, media organizations, and historically disadvantaged groups consistently participate in formal decision-making spaces and processes at all levels (federal, state, and community) across Nigeria. In general, substantive participation occurs throughout the country, and civic space is open.
Accountability	Very few ecosystem actors refuse or call out corrupt acts. Examples of corrupt actors being formally sanctioned or punished are	A small set of ecosystem actors sometimes refuse and/or call out corrupt acts. There are only a few examples of corrupt actors being formally sanctioned or	Some ecosystem actors at various levels (federal, state, and community) and sectors proactively refuse to participate in corruption, and there are examples of some corrupt	Many ecosystem actors at various levels (federal, state, and community) and sectors often proactively refuse to participate in corruption, and there are many examples of both	A wide swathe of ecosystem actors at various levels (federal, state, and community) and sectors consistently refuse to participate in corruption. In general, most corrupt actors

TAP Elements	Considerable Decline (0)	Slight Decline (1)	No Change Relative to 2020 (2)	Slight Gain (3)	Strong Gains (4)
	few and far between, and impunity is common.	punished, or those who operate with integrity being celebrated, and on the whole, corruption enforcement is weak.	actors being formally sanctioned and/or punished for illicit behavior, as well as some examples of those who refuse to engage in corruption being celebrated. Overall corruption enforcement is inconsistent, with some pockets of successful action for accountability.	corrupt actors being formally sanctioned and punished for illicit behavior and those who refuse to engage in corruption being celebrated. Corruption enforcement is improving, with examples of successful action across geographies, levels of governance, and sectors.	are formally sanctioned and punished, those who operate with integrity are celebrated, and corruption enforcement is strong throughout Nigeria.

Annex 6. Rubric Scores

In-Case Analysis

The graphic below shows how each of the 15 cases covered as part of *Method #2* scored against the Response, Responsiveness, and Responsive Accountability (RRA) rubric.



Results and Contributions in the Accountability Ecosystem

Collaboration



Finding [COLLAB 1:] Relative to 2020, the overall level and extent of collaboration and coordination across the accountability ecosystem has increased modestly. New collaborations and partnerships are evident among grantees across sectors and geographies, with several leading to specific results. For example, On Nigeria Joinbodi grantees led a multistakeholder coalition to support federal-level whistleblower protections, while another coalition of criminal justice grantees and partners supported the development and implementation of ACJLs in key holdout states. There is also evidence of grantees in all cohorts collaborating with government actors and other (non-grantee) civil society groups.

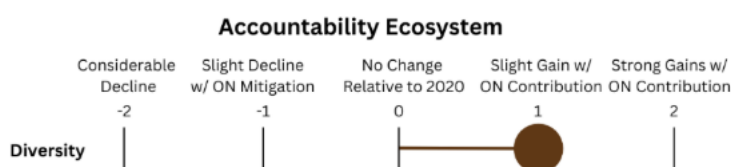
Despite these gains, and some evidence of long-lasting collaborations, many collaborative initiatives are nascent and/or supported by On Nigeria grants. There is limited evidence of

collaboration among other ecosystem actors—including government officials and agencies, as well as non-grantee media outfits and civil society organizations.

This situation exceeds the criteria for a score of 0, or “No gain,” but does not quite meet the threshold for a score of 1, or “Slight gain with ON contribution.” For that reason, a score of 0.5 is appropriate. There is substantial evidence showing a slight gain in collaboration over the period of On Nigeria among grantees, but there are still some gaps, particularly among non-grantee actors, that align with no change since 2020, resulting in **MEDIUM** confidence.

Finding [COLLAB 2]: A range of effective strategies to foster collaboration are apparent among actors throughout the ecosystem, including regular communication, convening, building trust, and using local networks. These were supported by On Nigeria’s cohort model, as grantees in all cohorts used these strategies to facilitate regular engagement, trust building, learning and skill sharing, and articulating organizations’ shared commitments and values. Collaboration was limited due to continuing lack of trust among certain groups or organizations, competition between CSOs, a lack of willingness to compromise, and lack of ownership or buy-in from government actors.

Diversity



Finding [DIVERSITY 1]: Relative to 2020, many On Nigeria grantees and their partners—especially in the Media and Journalism, Joinbodi, and Behavior Change cohorts—have successfully fostered the participation of historically disadvantaged groups, such as women, youth, and persons with disabilities in anticorruption programming. There are instances where members of such groups have assumed leadership of anticorruption efforts, as demonstrated by women in Achi (who organized a series of townhalls to mobilize citizen voice) and the Knifar women (who took up investigative reporting on government abuses).

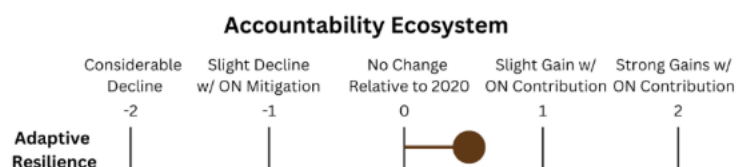
Though professional civil society organizations and a few government agencies continue to lead most accountability initiatives, there are several examples of non-usual suspects (media organizations, religious leaders, private sector actors, subnational officials and agencies) proactively initiating and leading anticorruption initiatives.

These conditions indicate that notable progress has been made in improving the diversity of the actors engaged in, and sometimes leading, accountability and anticorruption work in Nigeria. This situation meets the criteria for a score of 1, or “Slight gain with ON contribution.” Evidence is plentiful across all methods and sources and is consistent, which is why we are assigning a **HIGH** confidence level.

Finding [DIVERSITY 2]: On Nigeria grantees’ use of innovative strategies and their intentional focus on grassroots engagement contributed to observed diversity gains. Many Behavior Change grantees, for example, successfully trained youth in schools on how to identify and take action against corruption, while others celebrated government officials for acting with integrity (via the Integrity Icons initiative). Joinbodi and Media and Journalism grantees, meanwhile, implemented a variety of successful initiatives to help communities throughout the country participate in citizen monitoring efforts and town halls.

Despite progress, cultural and religious norms, excessive bureaucracy, geography, and economic hardships continue to hinder efforts to improve the diversity of the accountability ecosystem.

Adaptive Resilience



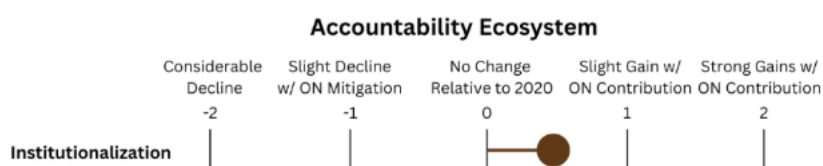
Finding [ADAPTIVE 1]: Relative to 2020, On Nigeria grantees in all cohorts have generally enhanced their capacity and practice related to MEL, and there are several examples of grantees using data to identify and respond to challenges (as in the case of the Akin Fadeyi Foundation's development of the FlagIt app in response to the COVID-19 pandemic). There is some evidence that a few non-grantees have also integrated ongoing MEL and adaptive processes into their operations, suggesting that—though these practices are not yet widespread beyond On Nigeria grantees—the adaptive resilience of the broader ecosystem may have slightly improved.

This situation exceeds the criteria for a score of 0 (“no change”), while there is some anecdotal evidence suggesting a score of 1 (“slight gain”). The strength of the evidence underpinning these claims is uneven, with some sources yielding higher scores and others lower. For this reason, 0.5 is the appropriate score, but with a **MEDIUM** confidence level.

Finding [ADAPTIVE 2]: On Nigeria's systematic encouragement to invest in and use MEL has led to many, but not all, grantees across cohorts adopting and using participatory MEL approaches, through which project partners and community members have supported the design and improvement of anticorruption programming.

Still, closing civic space, crises arising from the COVID-19 pandemic, rampant inflation, and the unrest surrounding the 2023 elections, as well as a general sense of inertia in many government agencies present obstacles that encourage continuous adaptation. One example of such adaptation is a switch to virtual or hybrid activities in response to COVID-19; still another is a shift to subnational- and community-level activities when struggling to gain traction at the national government level.

Institutionalization



Finding [INST 1]: Relative to 2020, a significant number of organizations in the accountability ecosystem have improved their financial and human capacity to continue work on anticorruption and social accountability issues. For example, many media actors have reportedly successfully diversified and grown their revenue, while On Nigeria grantees and their partners have consistently reported sustainable improvements in staff skills and organizational resilience.

Evidence of institutionalization is promising in some pockets and areas, as demonstrated by improvements in the implementation of criminal justice reforms. Several accountability initiatives, like the Corruption Tori Townhall initiatives started by Signature Development and

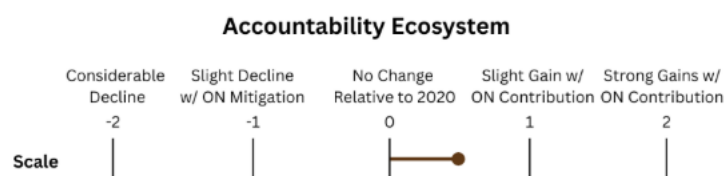
Media Foundation, emerging ACJMCs and similar bodies across the country, efforts to improve the capacity and practice of courts and lawyers, and training initiatives for anticorruption agencies, among others, have reportedly been taken up and incorporated by community leaders and some government institutions and are likely to continue beyond 2024.

This exceeds the criteria for a score of 0, or “No gain,” but does not quite meet the threshold for a score of 1, or “Slight gain with ON contribution.” For that reason, a score of 0.5 is appropriate. The evidence underpinning these claims comes from a wide range of data sources and methods, but some evidence does suggest a higher or lower score. For these reasons, the confidence level assigned is **MEDIUM**.

Finding [INST 2]: The MacArthur Foundation's 29% indirect cost rate policy has contributed to many grantees' growth in these areas. So too have grantees' commitments to collaboration and collective action, including via the cohort model, through which they created sector- and region-specific networks that facilitated efforts to strengthen sustainability.

However, many ecosystem actors—both grantees and non-grantees—still face persistent funding deficits, struggle with the consequences of “brain drain,” and/or fear they will face these challenges in the near future.

Scale



Finding [SCALE 1]: Relative to 2020, several grantee-led and/or supported accountability initiatives (featuring the work of grantees in all four cohorts) have been scaled horizontally, to new geographies. For example, BudgIT's Tracka and Connected Development Follow the Money platforms are now reportedly in use in communities across the country (Joinbodi). Additionally, Centre for Journalism Innovation & Development (CJID) noted that its fact checking initiative has been adopted by other media organizations that now run their own regular, live fact-checks of political debates (Media and Journalism), ACJMCs have rolled out in most states (Criminal Justice), and many faith leaders discuss corruption (Behavior Change).

Evidence of vertical scaling, however, is not readily apparent.

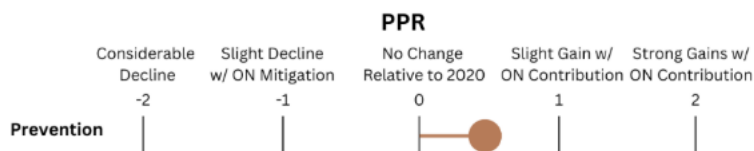
This situation exceeds the criteria for a score of 0, or “No change,” but does not yet meet a score of 1, or “Slight gain with On Nigeria contribution,” especially given the limited evidence of new actors stepping in to scale up accountability initiatives. For these reasons, a score of 0.5 is most appropriate. Despite several compelling examples and anecdotes, there is limited evidence, especially related to vertical and new actors scaling. A confidence level of **LOW** is warranted.

Finding [SCALE 2]: On Nigeria's emphasis on collaboration and co-creation—through which grantees worked together to share knowledge and resources and respond to new communities and actors demanding their support—contributed to these efforts, as did the long-term funding out of which several initiatives grew over time. With a few exceptions, however, non-grantees have played small or minimal roles in these successes.

Limited government support and political interference hinder efforts to take anticorruption efforts developed and spearheaded by On Nigeria grantees and their partners to scale.

Results, Contributions, and Contextual Factors re: Prevention, Prosecution, and Rejection

Prevention



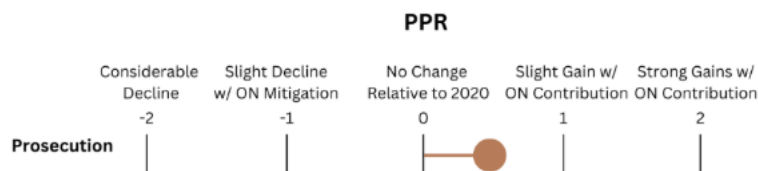
Finding [PREV 1]: Relative to 2020, prevention of corruption has structurally improved: all 36 states have now passed ACJ/Ls (up from 28 in 2020), 19 of which (53%) fully comply with the four core essential elements of the ACJA, and the vast majority of which contain GESI-related provisions; of the 31 states that have legal provisions for ACJMCs (or comparable oversight bodies), 27 now have them, as do three additional states. There are clear improvements in criminal justice procedures, due to the availability and institutionalization of information and communication technology improvements (like UWAZI), capacity building, and ACJA/L monitoring procedures, with pre-trial processes in states like Lagos and the FCT having seen especially notable progress. In practice, however, the implementation and effectiveness of ACJMCs varies widely, and evidence of the effects of GESI-related provisions on the practical experience of historically disadvantaged groups is limited.

The Prevention rubric includes four components which would have varying scores: 1) Passage of compliant ACJ/Ls (“Slight gain with ON contribution”); 2) active ACJMCs (“Slight gain with ON contribution”); 3) improvements in the dispensation of justice (“Limited gains with ON contribution”); and 4) evidence of benefits for historically disadvantaged groups (“No gain”). Considering these components together, the evidence suggests a score of 0.5 overall. The evidence comes from a variety of data sources and methods but is limited for the component of the score that refers to historically disadvantaged groups, which is why we are assigning a **MEDIUM** confidence level.

Finding [PREV 2]: On Nigeria grantees' collaborative programming, especially in the criminal justice cohort, guided the development and passage of ACJ/Ls in some states and supported the inauguration and implementation of state ACJMCs. In addition to the passage of ACJ/Ls, criminal justice cohort members created curricula and trained legal system actors, defined and disseminated best practices, established national minimum standards, and led peer review and court monitoring efforts, including through the development of digital platforms, which have contributed to the gains recorded.

However, high levels of turnover within government agencies and throughout the justice system and law enforcement, insufficient funding, poor infrastructure, and wide variations in political buy-in and support for reforms—as demonstrated by the persistence of frivolous adjournments and noncompliance with plea bargaining provisions—all continue to serve as barriers to these reform efforts.

Prosecution



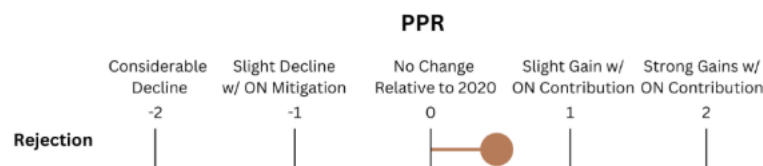
Finding [PROS 1]: Relative to 2020, the capacity and independence of police, lawyers, judges, anticorruption agencies, and ministries, departments, and agencies to investigate and prosecute and/or sanction corruption has improved, as evidenced by marked growth in the number of cases completed and convictions obtained by ICPC and EFCC. There are several notable examples of such actors taking action to address corrupt and/or improper acts (as demonstrated, in one instance, by police arresting a corrupt doctor in Plateau State). At the same time, survey results suggest that though lawyers and police are more effective than in 2020, police are still widely distrusted, and views are split on judges.

These conditions exceed the criteria for a score of 0, or “No gain,” but do not fully meet those for a score of 1, or “Slight gain with ON contribution,” as progress has not yet been reflected across a critical mass of legal system actors, and much more remains to be achieved with respect to the prosecution of corruption. For these reasons, a score of 0.5 is appropriate. The evidence underpinning these claims comes from a variety of data sources and methods, but some evidence suggests a higher or lower score, and some of the evidence is thin. For this reason, the confidence level assigned to the given score is **MEDIUM**.

Finding [PROS 2]: On Nigeria Criminal Justice grantees’ focus on building awareness and capacity with respect to relevant laws among legal system actors, their systematic collaboration and coordination with each other, and the way they have provided resources and staff to support trust-building and implementation, have contributed to improvements in the capacity and performance of some legal system actors. Also, strategic advocacy and investigative journalism in some instances have led to improvements in effective action against, and government response to, corrupt practices. At the local level especially, criminal justice grantees used local languages and tailored messaging to improve the reach of their campaigns.

Legal reforms undertaken since 2015 have also established a foundation for the observed changes. Political interference, persistent turnover, and the limited footprint of EFCC and ICPC staff, however, continue to hinder progress.

Rejection



Finding [REJ 1]: Relative to 2020, citizen awareness of corruption has grown considerably. Both media coverage and other forms of awareness raising—behavioural insights trainings, films, social media, and more—have expanded, and played a role in this improvement. Some citizens appear somewhat more likely to refuse to participate in or condone corruption; the number of people likely to refuse bribes has increased, and there are many examples of people and communities coming together to advocate for action against corruption.

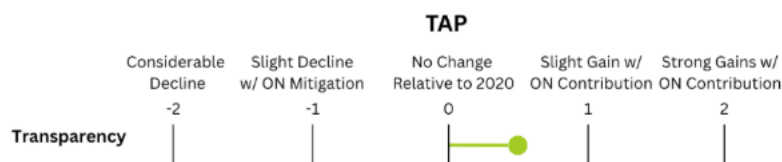
Still, many people are not actively engaged in rejecting corruption or taking accountability, and many populations—including those in historically disadvantaged groups—remain excluded from and/or unengaged in anticorruption initiatives.

This exceeds the criteria for a score of 0, or “No gain,” but does not meet the threshold for a score of 1, or “Slight gain with ON contribution.” For that reason, a score of 0.5 is appropriate. However, the strength of the evidence is uneven, with some sources yielding higher scores and others lower. For this reason, a **MEDIUM** confidence level is given.

Finding [REJ 2]: The use of local languages and amplification in media reporting, and an emphasis on naming and faming integrity champions, while sustaining consistent messaging over time, have all contributed to increasing awareness of corruption. Also, there has been an increase in religious leaders' frequency of addressing corruption, anticorruption enforcement, and integrity-related topics. Still, many people are not actively engaged in rejecting corruption or taking accountability, in part due to a lack of trust in government; shrinking civic space, economic instability, and violence also play a role. Many populations—including those in historically disadvantaged groups—remain excluded from and/or apathetic about anticorruption initiatives. Persistent social norms continue to enable corrupt behavior, and Delphi panelists point out that many rural communities are unaware of corruption and not involved in accountability initiatives.

Results, Contributions, and Contextual Factors re: Transparency, Participation, and Accountability

Transparency



Finding [TRANSP 1]: Relative to 2020, government transparency—especially in the areas of public financial management, procurement, and budgeting—has improved, as demonstrated by the launch of open contracting portals (26 states, plus federally), e-procurement portals (32 states). A variety of civic tech platforms supported by Joinbodi grantees, including Connected Development’s Follow the Money and BudgIT’s Tracka, are also widely in use.

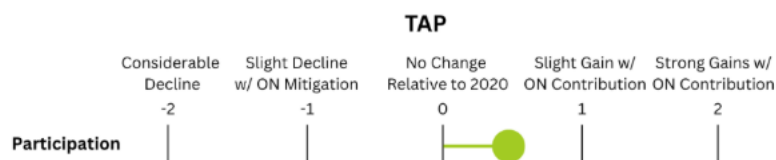
However, there is limited evidence of government institutions and agencies systematically explaining their decisions to the public, and/or engaging in public outreach.

These conditions indicate some improvement in the transparency of institutions and agencies in many sectors and across levels of governance, exceeding the criteria for a score of 0, or “No gain”. However, considering the limited evidence around public communication and engagement, the criteria for a full 1, or “Slight gain with ON contribution” is not fully met. Therefore, a score of 0.5 is appropriate. While there is evidence from various sources, the evidence for this variable primarily comes from the literature review. For this reason, there is **LOW** confidence.

Finding [TRANSP 2]: Technological advances, particularly the increasing adoption of digital technologies, such as e-payment, e-governance, and e-procurement systems (to which Joinbodi and Criminal Justice grantees have contributed), have facilitated transparency efforts, as has the presence and advocacy of multistakeholder platforms like the Open Government and Open Contracting Partnerships.

Shrinking civic space, however, and the centralized power of state governors—which makes state-level reform largely dependent on a single individual and/or administration—often undercut efforts to improve transparency.

Participation



Finding [PART 1]: Relative to 2020, there have been encouraging signs of momentum in civil society engagement and citizen participation in government processes. At least some citizens are increasingly participating in substantive ways at both the state and federal levels and actively shaping government decisions. Widespread protests catalyzed the demand for tools and platforms that enable citizen involvement in governance, prompting On Nigeria grantees to step in and provide just such tools and platforms, as demonstrated by the work of the Women Radio Network and Arewa Research and Development Project, among others. In spite of these modest gains, substantive participation by most citizens remains far off.

Overall, the situation since 2020 reflects a mixed picture, clearly exceeding the threshold for a score of 0 ("no change"), but not quite meeting the criteria for a score of 1 ("Slight gain"). A score of 0.5 is therefore appropriate. The strength of the evidence is uneven, with some sources yielding higher scores and others lower. A **MEDIUM** confidence level is given.

Finding [PART 2]: Ecosystem actors' decisions to systematically invest in building trust and relationships in local communities facilitated gains in participation, as did their focus on complementing and adding to existing platforms and networks, rather than trying to stand up new initiatives out of whole cloth.

Less encouragingly, Nigeria's civic space appears to be narrowing. Insecurity and violence are on the rise, and a series of ongoing political and economic crises have occurred since 2020. Collectively, these events have reduced citizens' ability and willingness to safely voice their opinions or engage in decision-making processes about the management of public resources.

Accountability



Finding [ACC 1]: Relative to 2020, there are a few examples of sanctions and enforcement being applied to corrupt actors, as well as some evidence of improved responsiveness and one-off instances of accountability on the part of government officials. For example, Media and Journalism grantees have documented the arrests and removals of many officials and individuals accused of corruption, and several case studies featuring grantees across cohorts, and their partners, capture instances in which officials have improved public service delivery in response to citizen complaints.

Consistent, long-lasting, and widespread improvements in responsive accountability, however, are not yet in evidence. There is still a widespread feeling that accountability and government responsiveness are weak, and there is little evidence of widespread refusal to participate in corruption on behalf of state officials, institutions, and non-state actors.

These conditions do not indicate significant growth in accountability since 2020, but nor is there evidence of backsliding or decline. This therefore meets the criteria for a score of 0, or “No gain,” with a **HIGH** confidence level.

Finding [ACC 2]: Ecosystem actors' collaboration has been a significant factor in the small accountability wins observed since 2020. For example, Media and Journalism grantees and their partners, including Joinbodi grantees, have collaborated to amplify investigative reports, ensure they reach the responsible parties, and advocate for meaningful government response. Criminal Justice grantees have worked with government actors to institutionalize ACJ/L-related reforms, and Behavior Change grantees have set up skill-building partnerships with several ACAs and MDAs.

However, structural issues such as judicial corruption, selective enforcement, and a self-serving public service culture, continue to hinder progress towards accountability.



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