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**Final Evaluation of the 'Support to Rule of Law  
and Anti – Corruption (RoLAC)' Programme  
and Formulation of the 'Support to Rule of  
Law and Anti - Corruption (RoLAC)'  
Programme Phase II**

**Evaluation Report  
July 2022**

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DAI Global Belgium



**DAI Global Belgium**  
Avenue de l'Yser 4,  
1040 Brussels  
Belgium  
[www.dai.com](http://www.dai.com)



**EUROPE Ltd**  
34 boulevard Terez  
1066 Budapest  
Hungary  
Telephone: +361 3268256  
+361 9200908  
[partner@europe.consulting](mailto:partner@europe.consulting)  
[www.europe.consulting](http://www.europe.consulting)



**NTT Data Belgique, SRL**  
Rue de Spa, 8, 1000  
Brussels, Belgium  
[www.nttdata.com/](http://www.nttdata.com/)

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## Acronyms

AC	Anti-Corruption
ACA	Anti-Corruption Agencies
ACAN	Anti-Corruption Agency of Nigeria
ACJA	Administration Criminal Justice Act
ACJL	Administration Criminal Justice Law
ACJMC	Administration Criminal Justice Monitoring Committee
ACTU	Anti-Corruption and Transparency Units
ADSACS	Adamawa State Anti-Corruption Strategy
AML/CFT/P	Anti-Money Laundering and Countering the Financing of Terrorism Policy
ANEEJ	Africa Network for Environment and Economic Justice
ANSACS	Anambra State Anti-Corruption Strategy
BC	British Council
BPP	Bureau for Public Procurement
CCB	Code of Conduct Bureau
CCT	Code of Conduct Tribunal
CFT	Counter Financing of Terrorism
COVID-19	Coronavirus Disease
CPN	Child Protection Network
CRA	Child Rights Act
CRA	Corruption Risk Assessment
CRL	Child Right Law
CSO	Civil Society Organisations
DAC	Development Assistance Committee
DFID	Department for International Development
DoA	Description of Action
DPP	Department of Public Prosecution
DSVRA	Domestic and Sexual Violence Agency
EC	European Commission
ECOWAS	Economic Community of West African States
EDF	European Development Fund
EDSACS	Edo State Anti-Corruption Strategy
EFCC	Economic and Financial Crimes Commission
EndSARS	End Special Anti-Robbery Squad
EQ	Evaluation Question
EU	European Union
EUD	Delegation of the European Union to Nigeria
FCT	Federal Capitol Territory
FGD	Focus Group Discussion
FJSRCC	Federal Justice Sector Reform Coordinating Committee
FMOJ	Federal Ministry of Justice
FMWA	Federal Ministry of Women Affairs
FOI	Freedom of Information
GAP	Gender Action Plan
GIZ	Deutsche Gesellschaft für Internationale Zusammenarbeit
GoN	Government of Nigeria
HiMAT	Hi-Level Multi-Agency team
IATT	Inter-Agency Task Team
ICPC	Independent Corrupt Practices and Other Related Crimes Commission
ICRC	International Committee of the Red Cross
IL	Intervention Logic

INL	Bureau of National Narcotics and Law Enforcement Affairs
IP	Implementing Partner
JC	Judgement Criteria
JSRT	Justice Sector Reform Team
JUSUN	Judiciary Staff Union of Nigeria
KANSACS	Kano State Anti-Corruption Strategy
LMDC	Lagos Multi-Door Courthouse
MDA	Ministries and Development Agencies
M&E	Monitoring and Evaluation
MCN	Managing Conflict Nigeria
MBNP	Ministry of Budget and National Planning
NACS	National Anti-Corruption Strategy
NAO	National Authority Officer
NAPTIP	National Agency for the Prohibition of Trafficking in Persons
NBA	National Bar Association
NCS	Nigerian Correctional Services
NDICI	Neighbourhood, Development and International Cooperation Instrument
NEITI	Nigeria Extractive Industries Transparency Initiative
NFIU	National Financial Intelligence Unit
NOCOPO	National Open Contracting Portal
NORAD	Norwegian Agency for Development Cooperation
NPA	National Police Act
NPF	Nigerian Police Force
NSA	Non-State Actors
OECD	Organisation for Economic Co-operation and Development
OPD	Office of Public Defender
OSIWA	Open Society Initiative for West Africa
PCACC	Public Complaints and Anti-Corruption Commission
PDSS	Police Duty Solicitor Scheme
PIU	Programme Implementation Unit
PRODA	Projects Development Institute
PSTC	Project Steering and Technical Committee
PWD	Persons with Disability
RG	Reference Group
RoL	Rule of Law
RoLAC	Rule of Law and Anti-Corruption
SARC	Sexual Assault Referral Centres
SCUML	Special Control Unit Against Money Laundering
SDG	Sustainable Development Goal
SDS	Social Development Secretariat
SGBV	Sexual and Gender-Based Violence
SOP	Standard Operating Procedures
ToC	Theory of Change
ToR	Terms of Reference
ToT	Training of trainers
TUGAR	Technical Unit on Governance and Anti-Corruption Reforms
VAPP	Violence Against Persons (Prohibition Act)
UNCAC	United Nations Convention Against Corruption

## Executive Summary

### 1. Description of the evaluation

In January 2022, the European Delegation to Nigeria commissioned an independent evaluation of the “Support to the Rule of Law and Anti-Corruption (RoLAC)” programme funded under the 11<sup>th</sup> European Fund Development, implemented by the British Council with a budget of 24 million euros.

#### 1.1 Country and sector background

Nigeria, with the largest population in Africa and despite its rich natural resources and cultural diversity, remains confronted with political, socio-economic, environmental, and security challenges. Although slowly resuming economic recovery in 2021 after the recession yielded by the COVID pandemic, growth prospects remain fragile, and a third of the population lives below the poverty line. Social and political unrest as well as insecurity and criminality, in the Northern and Southern states, continue to hamper reform efforts. Following the violent demonstrations of 2020, structural and constitutional reforms are taking place to improve governance in the wake of the coming general elections in February 2023. The justice reform process has been slow, although supported by many development partners for the last twenty years, including the European Union (EU). The passage of the Administration of Criminal Justice Act (ACJA) and other justice reform acts provided a major step forward in the justice sector, but also generated challenges to enforce the legal framework. The Government of Nigeria (GoN) has prioritised the fight against corruption as one of its main national development policies objectives in line with its international obligations. A national anti-corruption (AC) strategy was developed, and AC agencies (ACA) established. Despite positive changes registered in the areas of legislation, policies and capacities of ACA, gaps persist with overlapping mandates, coordination issues, underperforming systems, and deficits in public accountability.

#### 1.2 Presentation of the RoLAC programme

The programme’s overall objective is “to enhance good governance in Nigeria by contributing to strengthening of the rule of law and curbing corruption”. It includes four main outcomes focusing on effective and transparent dispensation of criminal justice and improved access to justice for women, children and persons with disabilities at federal and local state levels; enhanced performance and coordination among Anti-Corruption Agencies (ACAs) to address fight against corruption in the criminal justice sector, public procurement and the extractive industries; and empowerment of civil society, public and private sector to engage on criminal justice reforms and fight against corruption. The British Council managed the programme through a programme implementation unit (PIU) in Abuja and team members in the targeted focal states: Federal Capital Territory (FCT) Abuja, Lagos, Kano, Edo, Anambra and Adamawa. The programme oversight is ensured by Steering and Technical Committees at federal and state levels and a trilateral structure at federal level composed of the European Union Delegation (EUD), British Council, and the National Authorising Officer (NAO).

### 2. Objectives and scope of the evaluation

This final evaluation is an overall independent assessment of the performance of the RoLAC programme from its inception in July 2017 until the 31<sup>st</sup> of December 2021. The assignment specifically seeks to assess the expected results of RoLAC, how it responded to the needs and capacities of the national partner institutions and contributed to improve the justice sector reform and the fight against corruption, in the FCT and the five focal states. It also aims to identify enabling and hampering factors that positively or negatively affected the programme and intends to draw on key lessons learnt for the formulation of the follow up action.

#### 2.1 Evaluation methodology

The assignment started on 25 January 2022 in five phases: inception, desk, field, synthesis and dissemination. The design of the overall approach to the evaluation is evidence-based, focusing on

the use of quantitative and qualitative primary and secondary data sources. The assessment was guided by the reconstruction of the Intervention Logic (IL) of the programme at inception, underlying its results-chain framework, and then revisited after analysis of the evaluation findings.

The intervention was assessed based on five evaluation criteria: efficiency, effectiveness, early signs of impact, sustainability, added value, and nine evaluation questions (EQs), presented with associated judgement criteria and indicators in an evaluation matrix to guide analysis of findings. Conflict sensitivity, gender equality and human rights were addressed across the assignment. The evaluation team has applied a mix of data collection and analysis methods based on in-depth research and participatory consultations with programme stakeholders and the Reference Group. The tasks among the team members were shared according to their role and specialisation. All experts were involved in the data collection process given the large scope of the assignment, while the evaluation experts proceeded with the analysis, synthesis and reporting of the findings.

## **2.2 Limitations and risks**

The evaluation team identified several limitations and risks inherent to the implementation of the assignment at inception phase, including risks related to conflict and gender sensitive issues, ethical considerations, and adjusted mitigation measures. Key challenges encountered during the assignment mostly related to the large number of programme stakeholders to interview, vast geographic coverage and documentation to process; difficulty to combine both formulation and evaluation simultaneously, and limited time to synthesise evaluation findings and lessons learned.

## **3. Key findings/ Answers to Evaluation Questions**

The findings of the evaluation are summarised under each evaluation criteria and question.

### **EQ 1: Efficiency**

Despite a very qualified and experienced staff, the programme was appraised as overambitious in terms of scope and human resources invested. The broad scope of work defined in the Description of Action (DoA) and in the annual plans demonstrated an ambitious number of actions planned considering the surrounding fragile context, the different crisis that occurred in 2020 and their enduring effects until beginning 2021. The daunting amount of outputs and activities to deliver has proved to be resource intensive and time consuming, overstressing the implementation agency's staff and experts, who had to support, majorly on an individual basis, more than one hundred beneficiary institutions and organisations. The budget allocated to the human resources has however never been fully spent during the 4 years, with no costs incurred for the national pool of experts. International experts were less mobilised due to the COVID restrictions and other security issues. Other procurement, logistic, administrative and financial tasks, that had to fulfil strict ethics compliance regulations under British Council's procedures, proved complex and cumbersome to follow by stakeholders, yielding delays of payments. These hampered the efficiency of programme implementation, despite IP's attempts to correct these deficiencies. Although the governance structures established at formulation stage had foreseen a wide consultation process, they did not provide sufficient space for joint strategic thinking over key sector issues to prioritise the programme orientations. The Implementing Partner (IP) has developed an elaborate monitoring system and detailed log frame matrix, which allowed smooth tracking and quality reporting on achievements.

### **EQ 2, 3, 4 and 5: Effectiveness**

#### **General achievement of programme expected outputs and outcomes**

The programme overall demonstrated satisfactory progress against its planned outputs, with varied levels of advancement and completion in sector areas and targeted locations. In the justice sector, the most advanced achievements were observed under outputs related to the adoption, review, domestication and implementation of the Administration of Criminal Justice Act (ACJA), complementary criminal laws, laws and acts facilitating access to justice and protection of vulnerable groups. Improved coordination of the criminal justice sector was also partially achieved, RoLAC having strengthened collaboration opportunities and inter-agency cooperation among justice sector institutions, including with CSO, namely through the reinforcement of coordinating committees. This increased understanding for joint-cooperation work has however not yet led to strategic and



structured justice reform initiatives, and moderately influenced the timely and effective dispensation of justice service delivery. In the anti-corruption (AC) sector, some notable initiatives were undertaken to support legislative and institutional reforms. These mainly have been the passage or amendment of procurement laws, the development of the National Anti-Corruption Strategies (NACS) and the establishment of NACS monitoring and evaluation (M&E) Committees at the Federal level and in the focal States. These initiatives achieved various degrees of success due to financial challenges affecting the effective implementation of the NACS and the establishment of AC commissions in the states to further capacitate Ministerial and Administrative Departments (MDA). The programme has, to a reasonable extent, strengthened and improved the coordination framework among ACA, mostly at federal level, through supporting the technical upgrade of existing platforms. At the state level, mechanisms for vertical and horizontal coordination among ACA and justice sector institutions are to be enhanced. A comprehensive approach and results-oriented information sharing mechanisms along the criminal chain also lag behind effectively curb corruption practices on a longer-term basis. Progress was particularly achieved to improve transparency, accountability and integrity in key thematic sectors targeted by the programme. Based on this progress, RoLAC could however partially achieve its expected outcomes, as the different degrees of performance mainly relied on external factors that affected and limited the programme's effectiveness: COVID, insecurity in parts of the country, violent protests, strikes, and persisting institutional bottlenecks, that go beyond the control of the programme.

### **Effectiveness in contribution to access to justice and the fight against corruption**

The programme has effectively ensured the implementation of the criminal justice framework with the development of guidelines, standard operating procedures, practice directions, systems that enabled justice and law enforcement institutions to enforce measures in compliance with the criminal laws and speed up dispensation of justice for offenders and victims. The programme has also offered a strong operational support to facilitate access to justice mechanisms, through sensitisation and implementation of legislations, support to legal aid providers as well as protection structures assisting women, children and PWD at risk and SGBV survivors. Although awareness and accessibility to justice institutions for vulnerable persons increased, institutional engagement mostly depends on external funding by default of state budget support. The programme has supported AC institutions to develop tools and systems that facilitate accountability and transparency in the three targeted sectors despite improvements needed to systematically ensure their effective implementation through the NACS application by MDA, and establishment of ACTU and AC commissions. The programme encountered more success in public procurement, due in particular to personality drive as well as the commitment of CSO and public procurement agencies' staff at federal and states' levels. However, RoLAC has only considered corruption cases coming from outside but not within institutions, which prevented law enforcement and AC agencies to tackle accountability issues jointly and effectively both on supply and demand sides. CSO involved through grants, supporting the demand side of the programme's priorities, have shown instrumental complementarity to institutions' initiatives on legal awareness and counselling at community level. RoLAC's training provided to the media and CSO in investigative journalism and budget tracking enabled them to engage more effectively in investigating and reporting on criminal and corruption issues.

### **Effectiveness in strengthening the capacities of the various programme stakeholders**

Training activities provided to all justice and AC actors generally received positive feedbacks and impressive outcomes, mainly when delivered within a multi-stakeholder framework, peer-learning environment or through mentoring processes allowing cascading of knowledge and skills' transfer. These methods delivered positive results when training curricula were adopted by beneficiaries' schools or institutes, and when followed up activities were organised to guarantee more ownership. Although generally appraised as very useful and helpful, most justice institutions and AC agencies and CSO have requested further training to consolidate the knowledge gained. Assimilation and integration of knowledge and skills in the justice sector proved more successful because of guidelines jointly developed, and exchanges of experiences among counterparts. In the AC sector the trainings and tools developed have greatly helped their daily operations, strengthened their investigation techniques and coordination structures. The capacity building of ACA and CSO were reported to result in increased citizens' awareness on how to address their complaints of corrupt practices. However, there is still need for a robust capacity needs assessment on specific matters in

addition to training of trainers or embedding of mentors in certain agencies to adequately transfer knowledge and institutionalise the training.

### **Effective integration and mainstreaming of the rights-based approach, gender equality and conflict sensitivity**

Gender equality and rights-based approach were incorporated in the programme at formulation stage and throughout project implementation. Outcome 2 specifically focused on the provision of rights-based and gender-responsive mechanisms. Gender balance representation and inclusion of vulnerable groups were also promoted throughout legislative enforcement processes, training and dissemination activities, programme management and production of materials, but less mainstreamed and factored in the support provided to the AC agencies. Inclusion of PWD's interests in programme activities, empowerment of rights holders and victims of SGBV, as well as due respect of defendants and inmates' rights were promoted and emphasised. Although human rights issues and risks were identified in the M&E strategy of RoLAC, the discrimination risks of vulnerable groups and the conflict sensitivity of assistance measures have not been sufficiently assessed into the AC sector, and mitigating measures to reduce those risks not adequately addressed during the action.

### **EQ 6: Impact**

In general, the RoLAC programme was considered to have a clear influence on the justice sector and anti-corruption reforms at federal level and in states where it operated. The programme has contributed to tangible changes in policies, legislations and systems in the geographic and thematic scope under its influence. However, sustained efforts are needed to achieve the overall objective, as a 5-year programme is not sufficient to achieve enhanced good governance, strengthening of RoL and curbing corruption. Early signs of impact in criminal the justice sector have been directly influenced by RoLAC support while other changes occurred in the field of access to justice can be attributed to RoLAC and other development partners. In the AC sector, external support rightly complemented RoLAC's assistance and started to improve behavioural changes at both federal and state levels, namely in transparency of procurement processes, convictions of AC cases, and investigative reporting. Early signs of impact were also reported in the access to justice for vulnerable persons provided at local government levels, namely for PWD.

### **EQ 7: Sustainability**

RoLAC has tried to ensure sustainability of programme interventions through operationalising policies, processes and tools developed into the practices of institutions supported. Continuous support in capacity building and provision of expertise is still required by two thirds of the institutions interviewed except those that have incorporated the training modules into their curricula. The issue of high turn-over in some institutions and the low financial and /or human capacity of others raise concerns over the institutionalisation of these trainings. The evaluation team assessed that structural and financial issues in both sectors were interlinked with the capacity gaps of partner institutions, as they prevent them fully assume ownership over programme results. In the AC sector, although training on Corruption Risk assessment (CRA) was highly appreciated, it has somehow led to a misunderstanding on the certification process and limited the capacity of the agents trained to apply their knowledge. RoLAC developed exit strategies to guarantee a smooth handover process to partner institutions and consolidation of results in the last six months of the programme.

### **EQ 8 and 9: Added Value**

The team of evaluators found that the programme was coherent with other actions funded by the EU, among which two others were implemented by the British Council and adequately complemented RoLAC programme, henceforth benefiting to the beneficiaries. The programme also cooperated, to a certain extent, with the EU/UN Spotlight initiative for the protection of SGBV victims, in three states covered by RoLAC. Interesting and beneficial synergies took place with other national and international partner agencies assisting the same institutions, in the same states and on similar matters. The programme benefitted from a very good communication plan, and media strategy, which enabled an effective dissemination of programme results and excellent visibility for the EU.

### **Main lessons learned and conclusions**

- Although the sector wide approach initially researched could not be fully reached, and despite the difficult political and institutional Nigerian environment surrounding the programme, RoLAC has maintained a very good balance between the supply and demand sides, and adapted to the institutional, operational and coordination capacities of beneficiary partners.
- The programme planning and management approach responding to the individual requests and needs of targeted institutions, did not result in the initially planned integrated sector approach, as it had to struggle between competing institutional agendas and mostly unreliable systems.
- The programme governance structures are whether too broadly represented or too limited in their mandate to ensure efficient strategic orientation, coordination and oversight of the programme.
- Multi-stakeholder capacity building, peer learning initiatives and ownership of training curricula have proved to be more effective for replication of good practices and knowledge transfer.
- The support provided to the coordinating committees legally or statutory established to lead, administer and oversee the implementation of criminal justice reforms, has allowed to improve inter-agency cooperation and brought positive results in respective reform agendas.
- The interconnectedness of the criminal justice chain was difficult to address due to the separate development and handling of both justice and AC sectors.
- Inclusion and mainstreaming of human rights and gender equality are required to be further promoted and operationalised at grassroot levels, through support at local government level. Assessment of risks encountered by CSO in the justice and AC sectors, and discrimination of vulnerable groups and inclusion of their needs was not sufficiently addressed in the AC sector.
- The timely and effective dispensation of justice relies on external factors and structural gaps affecting both justice and AC sectors, as both reform agendas require more investment from States, ownership and leadership of reform processes, including on infrastructure.
- Full implementation of the NACS and results achieved within the public procurement space in the MDA that participated in the programme are to be further embedded and consolidated.
- Public engagement of CSO and citizens by public institutions on key transparency, accountability and integrity reforms has been limited in sector areas where corruption risks exist, despite CSO advocacy and oversight supported by the programme, and could only moderately improved.
- Cooperation with external development partners have proved essential to develop specialised expertise and increase awareness on legal rights and corruption issues at a decentralised level.

### **Key recommendations**

- The next implementing agency should primarily capacitate and engage the coordinating committees in the management of the programme and rationalise the planning and decision-making process of the intervention over key common issues and shared priorities in both sectors.
- The EUD should intensify its policy dialogue with federal and state governments to level up their investment in both sector reforms, namely to support the functioning of the coordinating bodies.
- Legal frameworks, capacity building processes and working tools that were developed under the first phase, as well as awareness and buy in among justice and AC actors should be further sustained, institutionalised and their compliance overseen to strengthen the impact and ownership of the gains achieved so far. Training curricula and modules should be further integrated into the curricula of relevant training institutes, to ensure transfer of skills.
- Based on RoLAC's, partners' and states' existing initiatives that set up technologic data information and case management systems, the next phase of the action should further assist beneficiaries with digitalisation and e-transformation solutions in assessed pilot states.
- Close coordination and synergies with other donors active in both sectors should further ensure capitalisation of gains and sustain efforts in promoting transparency and accountability, by tailoring support with the needed equipment and specialised skills training.
- Linkages between justice and AC sectors should be strengthened to improve transparency and accountability in both systems, with a focus on complaints and oversight mechanisms.
- Accountability and integrity programmes should include risks and mitigating measures of potential discrimination towards disadvantaged and vulnerable groups in the AC sector.
- Finally, the support to CSO should be increased, encourage joint initiatives with other CSO or other public institutions and enhance their roles as agents of change, by further supporting their engagement in public dialogue, investigative, monitoring and reporting functions.

## 1. Introduction

This draft final report relates to the final evaluation of the “Support to the Rule of Law and Anti-Corruption (RoLAC)” programme funded under the 11<sup>th</sup> European Fund Development and implemented by the British Council, for an amount of 24 million euros.

The report is structured in accordance with the requirements of Annex III to the ToR (Annex 1). It explores how the current action is responding to the objectives of the reconstructed Intervention Logic described in the inception report, along five evaluation criteria and nine Evaluation Questions formulated with their corresponding judgement criteria and indicators. Based on the findings, the evaluation team articulated a series of lessons learned, conclusions and recommendations proposing suggestions for the follow up phase of the programme, which formulation was running in parallel to this assignment.

This report outlines the following sections:

- the country and sector background
- the description of the RoLAC programme
- the objectives and scope of the evaluation
- the evaluation methodology
- The key findings analysed under the Evaluations Questions
- The assessment of the Theory of Change at the final stage of the programme
- The lessons learnt, conclusions and recommendations

### 1.1 Country and sector background

With an estimated population of 211 million in 2021, Nigeria is the most populated country in Africa with over 60% of the population under the age of 25. Despite its wealth of natural resources and thriving entrepreneurial culture, the country is confronted with political, socio-economic, environmental, and security challenges. Nigeria positions in the low human development category. Despite the devastating economic and social impact of the Coronavirus Disease (COVID-19) in 2020 and 2021, the Nigerian economy is expected to grow by 2.5 per cent in 2022, due to higher oil prices and growth in telecommunication and financial services. However, inequality remains high and has adversely affected poverty reduction with 40% of Nigerians who live below the country’s poverty line.

At the political level, six successive election terms were held since the return of civil administration in 1999. Muhammadu Buhari was re-elected for a second term following the 2019 presidential elections, with its party holding the majority of seats at both Senate and House of Representatives. Next general elections are scheduled in February 2023. The National Assembly is currently carrying out its fifth amendment of the 1999 Constitution, following recommendations collected during public hearings held across the country and requested by various agencies and groups. Among others, on police reforms, devolution of powers to state and local governments, financial autonomy of the judiciary and local governments, electoral reforms, improved human rights and gender inclusiveness.

In addition to the lockdown and restrictions imposed during the COVID pandemic, the social and political unrest observed during the End Special Anti-Robbery Squad (EndSARS) nationwide protests, in September-October 2020, further slowed down some reform efforts. The violence emerging during these events hampered the functioning of the police and judicial institutions, as courts and police stations burnt down and became inaccessible for security reasons.

The security situation remains challenging in the North-Eastern part of the country due to the attacks of non-state armed groups, coupled with cases of criminality, banditry and kidnappings in the north-west and continued unrest in the southeast resulting from separatist agitations. Despite progress achieved in strengthening its institutions, democracy and civic space, Nigeria still faces challenges in fulfilling its legal obligations and commitments, as demonstrated by its low to medium scores recorded in international and regional Rule of Law, Governance, human rights and gender Indexes (see Annex 12 for further details, namely over ranks and scores in the different sectors).



The criminal justice system in Nigeria has been on the path of reform since the return to democracy in 1999 with varied results and setbacks. It has attracted significant support and investment by government, civil society and development partners such as the EU and Department for International Development (DFID). The major leap forward came with the passage of the Administration of Criminal Justice Act (ACJA) in 2015. Its application was nationwide, in federal courts only, and the arduous process of getting states to pass and apply the ACJA by state courts exemplified the difficulty of coordinating the justice sector reforms in Nigeria. From 2015 to 2020, other major legal milestones were achieved with the passage of the Violence Against Persons (Prohibition) Act (VAPP) to address the rise of domestic, sexual and gender-based violence; the Correctional Services Act for reform in prisons and detention facilities and the Police Act, to improve work and cooperation between law enforcement and judicial processes.

Corruption has been posing a major threat in the overall development of the country and the Government of Nigeria (GoN), since 2019, has identified the fight against corruption as one of the main national priorities. Therefore adopting legislative measures, policies and strategies and establishing different Anti-Corruption agencies (ACA) with law enforcement and preventive roles to comply with its international and regional obligations under the different conventions and protocols the country signed and ratified (see Annex 12 for details). Many positive achievements have been registered in areas of legislation, policies and enhanced capacities of ACA. Nonetheless, gaps persist in the Nigerian AC sector such as inadequacies in ACA's establishment Acts, lack of coordination among ACA, underperforming ICT infrastructure, delays in prosecuting corruption cases, inadequate funding and deficits in demands for public accountability.

The European Union has been supporting the Nigerian justice and anti-corruption (AC) sectors since the 9<sup>th</sup> European Development Fund (EDF), starting with a capacity building intervention of the Economic and Financial Crimes Commission (EFCC). The 10<sup>th</sup> EDF financial support to the justice and anti-corruption sectors, aimed to improve the judicial and prison systems, strengthen human rights, efforts to reform the police, and strengthen the fight against impunity and against corruption.

## 1.2 Presentation of the RoLAC programme

The RoLAC programme, implemented by **the British Council (BC)** in the framework of the 11<sup>th</sup> European Development Fund (EDF), continues to support the justice and AC agenda of the GoN over the period July 2017 to July 2022, for an amount of 24 million euros.

Its overall objective/ impact is "To enhance good governance in Nigeria by contributing to strengthening of the rule of law and curbing corruption".

Its Specific Objectives (SO) / Outcomes are the following: **1)** Timely, effective and transparent dispensation of criminal justice at federal and local state levels, **2)** Improved access to justice for women, children and persons with disabilities at Federal level and in selected local State, **3)** Enhanced ability to address fight against corruption in the criminal justice sector, public procurement and the extractive industries, including through performance and coordination among Anti-Corruption Agencies (ACAs) and **4)** Empowered civil society, public and private sector to engage constructively on criminal justice reforms and in the fight against corruption. The programme is composed of 19 outputs, with each main component (for each outcome) comprising 4 to 6 outputs, and correlated activities described in the description of Action document.

The Programme is being undertaken in five focal states - Lagos, Kano, Edo, Anambra and Adamawa and the FCT, Abuja. Its operational management is entrusted to a project coordination unit within the British Council in Abuja, and team members in the six locations of the programme.

A **Steering/Technical Committee** meets regularly (quarterly meetings prior to the COVID restrictions) to oversee the programme and includes representatives of all stakeholders. This governance structure has a three-tier level made up of the Project Steering and Technical Committee (PSTC) at Federal level, the State Project Steering Group at States levels and the trilateral meeting.

**The main users of this evaluation** will be the EUD, the British Council, the Federal Ministry of Finance, Budget and National Planning (FMFBNP), the Federal Ministry of Justice (FMOJ), State Governments of the focal states, key project beneficiaries and other national stakeholders, including civil society groups. Based on the ToR, the progress of the assignment was followed closely by Reference Group (RG) consisting of members of the EU Delegation, the British Council, the National Authorising Office and the next Implementing Partner (IP).

### **Objectives and scope of the evaluation**

**The general objective** of this assignment was threefold and aimed to provide the relevant services of the EU, the interested stakeholders and the wider public with the following:

1. An overall independent assessment of the achievements and performance of the RoLAC Programme, with particular attention to its final results and reasons underpinning those results.
2. Key lessons learned conclusions and related recommendations for future interventions.
3. The development of the follow up sector action to be formulated under the Neighbourhood, Development, and International Cooperation Instrument (NDICI) programming.

**The specific objectives** of the evaluation were to assess:

- The extent to which the action has achieved its expected results (inputs, outputs outcomes and impact), reflected the needs of the national partner institutions and contributed to improve the justice sector reform and the fight against corruption;
- How the action has contributed to strengthen the capacities of the beneficiaries; and how both programme management and stakeholders perform in implementing the action;
- Changes that were brought about by the action and processes that led to these changes, understanding the context within which they occurred by identifying key hampering or enabling factors that may have negatively affected or positively influenced the changes observed, and / or by underlying intended or unintended achievements towards the researched impact;
- The effects of the action on the inter-agency cooperation (among programme stakeholders) and the coordination process with external partners;
- The extent to which the programme has influenced the sustainability of its achievements/deliverables and contributed to the monitoring and evaluation systems put in place in the sectors supported by the programme, including the improvement, quality and credibility of services delivered/structures set up;
- The effects of the programme's visibility and communication and its added-value.

The RoLAC programme is to be evaluated from its inception on **17 July 2017 until the 31<sup>st</sup> of December 2021**. It is to be noted that the Programme is still ongoing and was extended until July 2022. The **geographical scope** of the assignment covers the Federal Capital Territory (FCT) and the five focal states of Adamawa, Kano, Anambra, Edo, and Lagos. The final evaluation of the RoLAC programme is being conducted, in parallel with the formulation of the next phase, over a period of 6 months, started on **25 January 2022**, and in five phases: inception, desk, field synthesis and dissemination.

### **Evaluation methodology**

**Our overall methodological approach to the final evaluation of the RoLAC** programme is drawn from the requirements outlined in the ToR and based on the quality standards, principles and norms set out in the EU Better Regulations Guidelines and instruments, manuals and tools. The evaluation methodology, described below, is further developed in **Annex 2**.

As required in the ToR, the evaluation team **reconstructed the Intervention Logic (IL)** of the action during the inception phase to capture the chain's results and cause-and-effect links sequence of the action. The evaluation team drew up a diagram to present the preliminary analysis of the IL (see Annex 3) and described a narrative of the **Theory of Change (ToC)** to visually construct the initial performance framework of the action.

This diagram was further refined to assess the validity of the ToC at the final stage of the programme (Annex 3- 2) and reflect the changes observed compared to the initial objectives and plans. The assessment of the reconstructed ToC is in **Annex 3**.

The intervention was required to be assessed using the **four standard Development Assistance Committee (DAC) evaluation criteria**, namely: effectiveness, efficiency, sustainability, early signs of impact and the **EU added-value criteria**.

Henceforth, the Consultant had not to assess the relevance of the programme except to:

- Determine if the assumptions are still valid and if / how they are affecting the programme
- Determine if other assumptions have emerged and are therefore affecting the achievement of objectives and outcomes they supported;
- Assess the relevance of any existing set of indicators and mechanisms that have been defined to measure benefits and impact, based on the logframe and its updated versions.

Based on the indicative evaluation questions (EQ) formulated in the ToR, the context analysis and the reconstruction of the IL, the evaluation was structured around a set of nine EQ as follow:

Table 1: Evaluation criteria and Evaluation Questions

Criteria	Evaluation Questions (EQs)
Efficiency	<b>EQ1:</b> To what extent was the organisational and management set up of the programme conducive to an efficient programme delivery?
Effectiveness	<b>EQ2.</b> To which extent the project has achieved the expected outputs and outcomes? <b>EQ3.</b> How has the project contributed to the sectors of access to justice and the fight against corruption in Nigeria? <b>EQ4.</b> To what extent has the project strengthened the capacities of the various beneficiary Ministries, agencies and stakeholders? <b>EQ5.</b> To which extent were gender, human rights and conflict sensitive principles and measures reflected and mainstreamed in all phases of the project management cycle?
Impact	<b>EQ6.</b> To what extent has the programme achieved the overall objective and an actual change in the justice sector reform and the fight against corruption?
Sustainability	<b>EQ7.</b> Which modalities have the programme put in place to ensure continuation of net benefits after the intervention ends?
Added value	<b>EQ8.</b> To what extent has the project supported internal EU coherence and contributed to the coordination and the complementarity of EU activities, with the programmes of other donors in Nigeria, particularly Member States? <b>EQ9.</b> To what extent has the strategy and activities in the field of visibility, information and communication been effective?

These evaluation questions are presented with their associated judgement criteria, indicators, data sources and data collection as well as analysis methods in an evaluation matrix (**Annex 4**). It needs to be noted that only JC 9.1 under the EQ9 has been modified in its formulation. Conflict sensitivity, gender equality and human rights were emphasised in EQ5 but also embedded in all EQ and data collection tools to ensure that these issues were addressed across the assignment.

### **Evaluation methods and tools**

The evaluation team has applied an **evidence-based approach**, focusing on a mix of data collection and analysis methods, and using a combination of qualitative and quantitative, primary and secondary data, based on available sources, internal and external to the programme.

The evaluation team used the following tools and methods to collect, structure, process and analyse the necessary information to ensure the reliability and validity of conclusions, linked to the EQs.

**A desk review** facilitated by the development of a coding structure (Annex 5) to allow identification of relevant quantitative and qualitative content of the in-depth document analysis during the desk phase (Annex 6). The field mission, which took place from 14 February to 28 March 2022, placed particular emphasis on processes and gaps, which could not be fully covered by the desk analysis.

**Bilateral and group interviews on the field** were conducted based on the key informant interview guidance (Annex 7) developed during the desk phase and adapted for the field phase.

**Focus group discussions (FGD)** were organised for meetings gathering several CSO partners and / or representatives of partner agencies focusing on the same key thematic issues.

(See the non-exhaustive list of persons interviewed in all focal states, field schedules **in Annex 9**).

**Two triangulation sessions were organised with the British Council** in March on logistic, financial and thematic aspects of the programme to receive clarifications.

**Two presentations** of the new formulated programme and the evaluation findings were delivered on the field with the Reference Group to discuss questions on the findings and recommendations.

**Data analysis and synthesis tools:** triangulation, contribution and attribution analyses.

**Distribution of tasks among team members:** As initially planned, all experts were involved in the data collection process during their meetings with the targeted beneficiary institutions and organisations and gathered information relating to both evaluation and formulation processes, on their respective sector of specialisation (justice or anti-corruption). The experts shared their respective inputs during weekly meetings, followed by briefing notes and further informal exchanges. All documentary information and interview notes were shared on a common database. Analysis of findings and reporting was distributed among the two evaluation experts and the Team Leader for finalisation of deliverables.

### Limitations and risks related to the assignment

At the Inception phase, the Consultant had identified a series of key challenges and limitations that might affect the smooth implementation of the assignment. These limitations and risks included conflict sensitive and gender sensitive issues, ethical and confidentiality considerations related to data privacy, with mitigating measures proposed in order to ensure achievement of the expected services. Except for the delays occasioned by the challenges cited below, the evaluation process has not been affected by the risks initially assessed. Tables underlining these limitations, risks and mitigating actions have been reviewed during the assignment (see updated table in **Annex 10**).

The key challenges encountered during the assignment were as follow:

- The overwhelming number of key stakeholders interviewed 400 persons in 120 institutions.
- The difficulty to combine the evaluation and the formulation phases at the same time, as an identification would have been more realistic to conduct while the final evaluation was ongoing.
- The difficulty to draft an action document while the full analysis and synthesis of the findings was still taking place. This led to the impossibility, as planned in the inception report, to produce deliverables for formulation and evaluation simultaneously and without any delays. Moreover, the evaluation experts were only two instead of four during the mid-term evaluation.
- The quality control of the EU HQ was also not factored in the initial timelines provided for the exchanges of comments and required twice more time to answer and integrate.
- The sheer scope of the RoLAC programme containing a large scope of work and covering more than two hundred activities per year was a challenge.
- The sensitive issues of the programme, touching upon criminal justice, sexual and gender-based violence (SGBV), corruption, lack of funding etc.
- The length of the field mission was not sufficient to grab a comprehensive assessment of all capacity needs and interests of beneficiary institutions and to verify their functions accordingly.
- Data collection was also a challenge, particularly with follow-up requests for documentation and statistics, needed to be researched or requested to British Council.
- Although not foreseen initially, the experts' team had to prepare **two feedback sessions** with the key partner agencies on 14 and 15 March 2022, that sixty representatives of the justice and AC institutions attended to provide their inputs on the new programme outline.



## 2. Findings / Answers to Evaluation Questions

These findings are based on primary and secondary evidence collected in project documentation of the RoLAC programme, external sources of literature, and interviews conducted with all key institutions and persons interviewed.

The findings presented below follow the structure of the evaluation matrix and answer the evaluation questions under the judgement criteria identified, guided by the indicators suggested in the matrix, which are however not reproduced below.

### 2.1 Efficiency

#### EQ1. To what extent was the organisational and management set up of the programme conducive to an efficient programme delivery?

<b>JC 1.1 Staff allocation was sufficient to implement the action efficiently</b>
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During the mid-term evaluation, the RoLAC programme was appraised as overambitious in terms of scope; resources invested were assessed as too scarce in view of the work to accomplish, depriving the project of more sustainable gains such as long-term knowledge of transfer (see references in Annex 12).

Component managers in the PIU and state programme coordinators, received more support with programme officers at PIU level and state office administrative and resource assistants during the programme implementation (from year 2 onwards). Five finance staff and four procurement staff posted in Abuja worked for the three programmes run by the British Council, which allowed the IP to mutualise logistic and financial functions and make some savings on personnel costs. However, the situation remained unchanged at the time of the final evaluation stage. The Evaluation team notes that the institutional support and capacity delivered to the beneficiary institutions were mostly provided on individual basis, which was time consuming and resource intensive (see details in Annex 12). Most beneficiary partners considered that the programme management staff, mostly at the PIU level, was overstretched by this large number of activities to implement.

With the extension of the programme to July 2022, and the increase of the programme budget to 24 million euros before the 4<sup>th</sup> year of implementation (from mid-July 2020 to mid-July 2021), the total amount allocated for human resources went from 5.851.535 euros to 6,418.688 euros. However, there was 161.000 euros less spent on this chapter than forecast for this 4<sup>th</sup> year, with all lines underspent. Moreover, all financial reports from years 1 to 4, indicate that none of the costs allocated for the consultancy pool of national experts was spent. Their described role in the Description of Action (DoA) was “to work with the programme team on implementing the project for each component”. These could have supported the component managers, programme officers and state programme coordinators in implementing technical and operational tasks.

According to the beneficiaries, this overload of planned activities yielded more focus on administrative and logistic aspects than on technical engagement and transfer of know-how. Some partners regretted that activities interrupted following the outbreak of the COVID pandemic, had not been re-initiated until the time of the field visit. They also pointed out the lack of follow up mentoring sessions after training was provided, or the lack of feedbacks after the completion of CSO grants). The lack of work force also affected the efficiency of procurement and financial procedures JC 1.3).

<b>JC 1.2 The managerial capacities and technical skills of the KE and NKE were appropriate to implement this programme</b>
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Based on their interaction with the Experts’ Team and the general feedbacks received by programme stakeholders, the staff of the PIU and state coordinators seemed very qualified, knowledgeable, and skilled in their respective functions. Most of them have had experience in the justice and anti-corruptions sectors, due to their previous work for the Justice for All Programme,

funded by the Department of International Development (DFID).

**Most staff and experts mobilised** for the institutional strengthening and capacity development of beneficiary institutions **were local experts**; only six international experts were reported by British Council<sup>1</sup>. The costs allocated for the consultancy pool of international experts was absorbed at 60% by July 2021. The mobilisation of international experts within this programme was challenging during the COVID pandemic period and because of the security conditions<sup>2</sup>. However, sufficient budget for international experts continued to be forecast until the end of year 4 (see additional information in Annex 12).

Due to these limitations, RoLAC used CSO grants to provide services and technical assistance partially or fully to national institutions, e.g. the support provided by the non-governmental organisation Prisoners Rehabilitation and Welfare Action (PRAWA) to the Nigerian Correctional Service (NCS). Judges from the High Court of Lagos have also been recruited as technical experts to train their peers in other states and replicate the good practices they had put in place in their jurisdictions and services. It is also to be noted that the transfer of expertise foreseen to training institutions. Such as the Nigerian Institute of Advanced Legal Studies (NIALS), Police Training Institutions and training academies of the Economic and Financial Crimes Commission (EFCC) and the Independent Corrupt Practices and Other Related Crimes Commission (ICPC), started to be initiated at a later stage in the programme. Therefore, in this field, the managerial capacities and technical skills of the staff and non-key experts have been very limited compared to the plan for establishing and developing a Centre of Excellence or a Training, Research and Innovation Hub<sup>3</sup>.

### **JC 1.3 The internal programme management and procurement procedures, coordination and monitoring mechanisms were executed timely and with quality**

Complaints from programme stakeholders in FCT and the focal states (two thirds of the people interviewed) continued to be made on the several months delays in reimbursement of transportation allowances, per diems (for participants who attended meetings) and are reported to affect the attendance of participants. Most CSO grantees also noted, during their interviews, that British Council had a complex and cumbersome administrative and financial procedure and that late payment of the tranches delayed some of their planning.

**Reproaches on procurement procedures** for the selection and recruitment of consultants were also addressed, some institutions complaining about the lack of consultation on experts has required professional criteria (technical knowledge), their lack of contribution to the terms of reference and the lack of coherence of the proposed training activities with partners' mandate. Some partners also requested to be more involved in the management process of the programme and have more transparency on budget allocated for activities to be delivered. This is a sensitive matter to address given that British Council's budget is output focused and that interference of partners into financial management could potentially lead to some conflicts of interests. However, technical support provided to institutions on budgeting and costing of their action plans could lead to transparent discussions and further explanations on programme expenditures.

As per the conversation held with British Council on 7 March 2021, they admitted the delays observed with payments due to the strict reporting and financial procedure in place, which does not allow flexibility when there are mistakes in the bank accounts transmitted or if invoices and evidence supporting award processes are not submitted. The administrative, finance and procurement staff of the British Council works on the 3 programmes implemented by the organisation, which is allowing

<sup>1</sup> Meeting with the British Council on 7 March 2011

<sup>2</sup> For this assignment, European expatriates were not recommended to go to three of the focal states

<sup>3</sup> The Description of Action (DoA) was outlining that it would be the first of its kind and it would save resources used in travelling and paying for international experts. Once it would have been set up, support was required in the first year of the programme to develop the curriculum and identify trainers.

them to save costs and but is also slowing down the efficiency of administrative processes. BC also conceded that their internal rules do not generally foresee and approve participation of the beneficiaries in the recruitment process of experts, to avoid favouritism and conflict of interests. However, BC stated they made a few exceptions in specific cases and has involved beneficiaries in the selection of vendors e.g. the development of the Sex Offender Register with the National Agency for the Prohibition of Trafficking in Persons (NAPTIP), the EFCC e-archiving system with EFCC.

**The governance structures**, as established during the formulation stage, also appeared ill adapted to the programme features during the implementation process. Despite consultation of stakeholders on annual workplans developed and reviewed during PSTC, the number of representatives attending those meetings has raised to fifty participants. This is not adequate (according to the evaluators) to deepen the conversation on strategic objectives of each sector component and existing gaps, namely because senior staff are not always present. PSTC members agreed to hold separate individual meetings with focal points of key agencies at a meeting of 23 November 2018. Moreover, there has been disagreements between the IP, the focal person of Federal Ministry of Justice (FMOJ) - also coordinating the Federal Justice Sector Reform Coordination Committee- and the EUD, namely because the FMOJ was not part of the trilateral meetings at the federal level governance

**This trilateral meeting** was considered less important than the PSTC, in the hierarchy of the programme governance structures, and was therefore less strategic. However, the focal person of the FMOJ stated that he would have liked the Ministry to be officially part of this managerial meeting, which mandate was to review upcoming activities and management issues, together with the EUD, the NAO and the British Council. Although the FMOJ was conveyed to organise quarterly meetings between the FMOJ, the Ministry of Budget and National Planning (MBNP), EUD and British Council, the FMOJ never accepted this proposition.<sup>4</sup>

Except for these drawbacks in efficiency, the management of the programme as well as the monitoring and evaluation (M&E) system and tools developed by the IP are generally considered efficient and effective. The British Council developed and updated an M&E strategy (last version in August 2019) and an Indicator Handbook (last version in July 2020). These tools enable a smooth and easy tracking progress of the programme results. They are used to complete the log frame matrix and the annual reports. Additionally, annual experts' assessment reports provide an external appraisal on the progress of the programme, for each component, through surveys conducted with partners' institutions and justice and public users. These experts attribute a score to each of their main EQs and inform indicators that require an assessment. The log frame matrix is very detailed and well evidenced, with well-developed indicators, baselines and targets which have been regularly updated (Annex 11). A sample of ten post-training evaluations reports based on a questionnaire submitted to trainees was made available to the team of experts. These reports provide information on if and how trainees applied the knowledge learned during the workshops and how they have adapted or not the techniques or tools in their professional practice. These reports inform about the self-performance of the trainees based on subjective perceptions but are relevant for M&E process.

As of 31 December 2021 (cut-off date of the evaluation period), RoLAC had absorbed 80% of its €24 million budget. One or two budget lines linked with outputs under each of component remain underspent with only 40 to 60% absorbed. The least expenditures recorded is the budget line dedicated to output 2.5 "Enhanced dispensation of justice by formal, informal and traditional entities at local level" which is only spent at 20%. Given the remaining life span of the programme after this financial situation (7 months), and the committed expenditures made until July 2022, the IP was examining if another prolongation could be made until beginning of 2023, to transition with the follow up phase. The actions foreseen under the exit strategies for the last months of the programme seem to require a lot of human resources based on the handover planned, reallocation of budget on priority measures or implementation of activities that have been interrupted and need to be further sustained.

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<sup>4</sup> These tensions were clearly exposed during the Experts' Team interview with the FMOJ and the issue was debated between the focal point of the Federal Justice Sector Reform Coordination Committee (FJSRCC) and the representative of the EUD during the feedback session of 14 March 2022.

## 2.2 Effectiveness

### EQ2. To which extent has the project achieved the expected outputs and outcomes?

It results from the colour coding applied to the target values achieved in the log frame matrix, that the programme has been able to achieve partially its goals at output and outcome level.

The following findings are attempting to explain how each main programme component and key elements have reached (or not) the expected set results and targets.

#### **JC 2.1 Progress achieved in passage of laws and adoption/ implementation of policies / strategies**

##### In the Justice sector

Under the first component related to the implementation of the Nigerian Criminal Justice Reform Agenda, the first three outputs have been mostly achieved, while the fourth is on its way to being completed. The relevant legal frameworks for criminal justice reform have been put in place, strengthened, and publicized.<sup>5</sup>

Output 1.1 on implementation and adoption of the Administration of Criminal Justice Act (ACJA) and Administration of Criminal Justice Laws at federal and state level respectively, has been achieved, except for Anambra where the ACJL is being finalized following the review supported by ROLAC. (See Annex 12 for details).

At the federal level, the Administration of Criminal Justice Act (ACJA) was passed in 2015 and ROLAC has invested in its implementation since 2017. At the state level, significant success has been recorded in all the focal states on the passage or review of the Administration of Criminal Justice Laws. Those that have not been passed are mostly in advanced stages in the legislative houses. ROLAC supported the passage of the ACJL in Adamawa and Kano. Anambra, Edo, and Lagos states already had a version of the ACJL before ROLAC's intervention. ROLAC however supported the review of the ACJL in Anambra and Lagos to address gaps in the existing laws.<sup>6</sup>

The Lagos ACJL has been passed and assented to since October 2021, while the Anambra ACJL is at the Committee state in the State Legislature. The success in the passage and review of these laws draws largely from an increased awareness amongst justice actors on the possibilities for reform and the positive impact the changes have on the criminal justice system. Lessons learnt from the implementation of the ACJL at the Federal level and states like Lagos, also helped to inspire other states to adopt the ACJL. However, progress within the states is often dependent on internal dynamics (external to ROLAC) such as the priorities of the State legislature and their relationship with the Executive, especially the office of the Attorney General.

Output 1.2 on enactment and implementation of the critical criminal justice reform bills complementary to the implementation of the ACJA at federal and state level has been partially achieved.

At the Federal level, the relevant laws have been adopted owing to concerted efforts from ROLAC, CSO, and in some cases, the relevant government institutions. The results differ from states to states, often due to differences in time of enactment and internal capacity for implementation.<sup>7</sup>

ROLAC supported the passage of the **Nigerian Correctional Service Act (NCSA)** in 2019 and the

<sup>5</sup> British Council: Document "Tracking the ROLAC Theory of Change, Component One" page 1

<sup>6</sup> ROLAC Year 4 Annual Progress Report, page 15. The reviews focus on 'provisions that authorise oversight visits and strengthen remand administration, as well as the creation of mechanisms like the Administration of Criminal Justice Committee (ACJMC) to promote and monitor ACJL implementation.'

<sup>7</sup> Due to differences in time of enactment and internal capacity for implementation. See Section 4.1.8 Year 4 Expert Assessment Report – Impact level.

development of training manuals, guidelines, procedures, and structures to implement the law.<sup>8</sup> RoLAC was considered as instrumental in the finalisation of this Act (see reference in Annex 12). The NCSA ensures compliance with the ACJA and international human rights standards, promotes non-custodial penalties, restorative justice, and rehabilitation of ex-prisoners.

The **passage of the Nigerian Police Act (NPA)** in 2020 was also a major boost for criminal justice reform,<sup>9</sup> the law applying in Abuja and all the states of the Federation. Following the enactment of the NPA, RoLAC supported the Police Service Commission (PSC) and Civil Society in the review of the Police Service Commission Act by the National Assembly. At state level, Adamawa has reviewed and passed the Penal Code Law. Additionally, in Anambra, the Magistrate Courts Law has been passed and was assented to in December 2021. The Multi-Door Court House Law is at 2<sup>nd</sup> reading before the Anambra State Legislature. The Criminal Code law reviews have been completed in Anambra (awaiting passage), Edo and Lagos state.<sup>10</sup>

Outputs 2.1, 2.2 and 2.3, which refer to the implementation of the Violence Against Persons (Prohibition) Act (VAPP), the Child Rights Act (CRA) and other laws that facilitate access to justice for women, children and PWD, have also been partially achieved. Though the Federal laws are in place, the results at state level are still varied in line with reasons given under the Outputs above (Details on the passage and implementation of these acts at federal and level states in Annex 12) .

Although there are visible signs of progress, much work still needs to be done to create awareness on the new legal frameworks. For some partners, these legal innovations yield additional work as they have to adapt to the new rules and requirements. There is also need and necessity to overcome institutional limitations such as the lack of vehicles to transport detainees or lack of an adequate budget for prosecuting cases in the DPP's office. These are beyond the scope of RoLAC.

#### In the AC sector

Output 3.2 of the programme is mostly encompassing the key thematic areas of adoption and implementation of laws, policies and strategies, which are at various degrees of advancement.

At the federal level, some activities have been undertaken towards enabling laws and institutional reforms to tackle corruption. Some notable initiatives include the following: the Proceed of Crime Bill, the EFCC's five-year strategic plan, the deployment by the ICPC of the Ethic and Integrity Compliance Scorecard as well as the deployment by the NFIU of the Crimes Record Management System (CRIMS)<sup>11</sup>. Policies, regulations, frameworks, systems and practices have been adopted and are in place to increase transparency and accountability. The passage or the amendment of Public Procurement Laws in Kano, Anambra, Adamawa and Edo States<sup>12</sup> are notable examples.

In addition, RoLAC support has led to the development of the National Anti-Corruption Strategies (NACS) and the establishment of NACS (Monitoring and Evaluation) M&E Committees to monitor implementation of the strategy at the Federal level and in the focal States. Priorities areas have been identified in the NACS action plan; and have progressed at varying degrees at both the Federal and States levels, including the establishment and/or implementation of M&E frameworks<sup>13</sup>.

This was confirmed/demonstrated by interlocutors during the field missions where copies of the NACS for instance, were distributed or shown to the evaluation team. RoLAC also supported the printing of the NACS for the Ministries, Departments and Agencies (MDA) in the focal States for awareness raising and implementation purposes.

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<sup>8</sup> As per interview with officials of the Nigeria Correctional Services 17 February 2022 in Abuja

<sup>9</sup> The previous Police Act predates Nigeria's independence, was archaic and out of touch with current criminal justice aspirations especially in the light of the ACJA.

<sup>10</sup> RoLAC Year 4 Annual Progress Report, page 22

<sup>11</sup> RoLAC updated Logframe

<sup>12</sup> RoLAC results-based framework 2021

<sup>13</sup> RoLAC Year 4 Annual Report 2021



Focal states have taken ownership and are implementing their NACS albeit at different levels e.g.: Kano State Anti-Corruption Strategy (KANSACS) in Kano State, Adamawa State Anti-Corruption Strategy (ADSACS) in Adamawa State, Edo State Anti-Corruption Strategy (EDSACS) in Edo State, and Anambra State Anti-Corruption Strategy (ANSACS) in Anambra State<sup>14</sup>. This has greatly facilitated the ability of the committee to have oversight over procurement issues for example, from the start of the procurement process through to award of contracts. According to the committee members, the Public Procurement Agencies staff and the CSO, this has also brought about some level of transparency in the procurement processes (See Annex 12 for further details).

## JC 2.2 Progress achieved in terms coordination among justice and / or AC institutions

### In the justice sector

Although output 1.4 on improved coordination of the criminal justice sector at the federal and state level, and between states is only partially achieved, considerable progress has been made in that regard.

**ROLAC support created opportunities for collaboration between justice sector actors.** For instance, ROLAC supported peer learning and collaboration between the Department of Public Prosecution (DPP) and other justice actors (judicial officers, defence attorneys) in the focal states to share experiences from the success of Plea Bargain in Lagos (See further explanations on the Lagos experience, examples in other focal states and results - Annex 12).

**It also strengthened partnerships with CSO and the media, as well as with the communities** so that it was easier to identify and arrest sexual offenders and perpetrators. It revitalized the functionalities of various Committees in the states and improved coordination amongst them. These include the Justice Sector Reform teams and the Administration of Criminal Justice Monitoring Committee (ACJMC) in all the states and FCT; the Child Rights Implementation Committees and Child Protection Networks (in Lagos and Anambra), the VAPP Committee in Anambra, the Hi-Level Multi-Agency team (HiMAT) (in Adamawa) and Service Providers Accountability Resource Committee (SPARC) (in Edo and Adamawa).

**In all the states, the establishment of the Justice Sector Reform Team (JSRT) has enhanced coordination amongst justice sector actors.** It helped to eliminate or minimize rivalry between agencies. Justice sector actors are no longer taking sole credit for results based on their respective agencies. Overall, there is more inter-agency interaction, with increased understanding of roles of other agencies and their challenges<sup>15</sup>.

However, despite inputs provided to the yearly workplans elaborated by ROLAC, **most state partners did not show a preparedness for many of the reform initiatives.** Most activities were chalked up as achievements without commensurate evidence of impact. More importantly, the activities did not reflect an internal and deliberate reform agenda that demonstrated an understanding of what needs to be done and when. During the 4<sup>th</sup> year of the programme, RoLAC has therefore provided the Justice Sector Reform Teams (JSRT) with the capacity to develop reform initiatives, raise funds, and monitor and evaluate projects, to improve the long-term sustainability of justice reform initiatives that RoLAC has supported in each state so far. RoLAC hosted workshops for JSRT in all focal states except Edo, to train them in project design, management, monitoring and evaluation, and fundraising.

Despite the gains achieved on coordination among justice actors, there are still a few challenges hindering effectiveness of this process. First, though the various actors have a better understanding of the other institutions and their challenges, this has not translated into the effectiveness expected because of persisting institutional bottlenecks.

<sup>14</sup> Meetings with Heads of Civil Service Teams in focal States

<sup>15</sup> Feedbacks from stakeholders' interviews in all focal states

Second, there seems to be a lack of actionable plans and follow up on the outcomes of the joint meetings organised. Lastly, in cases where identified issues lingered without resolution, a more technical role of the PIU, beyond the administrative support, was missing to facilitate speedy resolution of these problems.

### In the AC sector

Under Output 3.1: “Enhanced coordination among ACAs”, the following achievements<sup>16</sup> have been made:

- EFCC and ICPC recorded highest number of prosecutions and convictions in 2021 than in the entire history of their existence.
- The NACS is slowly but surely becoming a central coordination framework for national and sub-national Anti-Corruption reform efforts.
- All focal states now have their state-specific Anti-Corruption strategies with implementation structures established.
- The Nigeria Financial Intelligence Unit (NFIU) shares regular intelligence with all ACAs and LEAs thereby improving investigations and prosecutorial outcomes.
- Partnership MOUs between NEITI and ICPC, NEITI and EFCC, as well as between NFIU and ACAs, EFCC – NEITI for improved corruption investigations
- Improved technical level cooperation and coordination under TUGARS’s Inter-Agency Technical Team (IATT) platform, for implementing UNCAC COSP Recommendations.

Notably at the Sub-National level:

**The ANSACS and OGP in Anambra** now have a common M&E Committee for improved coordination and cooperation. This would however need building upon e.g. providing funds for a more effective functioning of the committee. The committee expressed their desire for funding to be integrated into the MDA’s budget for the activities of the ANSACS. The NACS is slowly but surely becoming a central coordination framework for national and sub-national Anti-Corruption reform efforts.

**At the Federal level, TUGARS’s Inter-Agency Technical Team (IATT) and the NFIU Intelligence Sharing Framework** are the main coordination platforms established and upgraded for coordination of ACA. This, as mentioned by the implementing agency, is informed by lessons learnt from the past as the best and most practical approach for now. There has been an improved technical level cooperation and coordination under (IATT) platform, for implementing UNCAC COSP Recommendations.

**At the state level, due to the lack of specialised AC agencies**, RoLAC is supporting ACA coordination and cooperation more from the platform of the NACS in the focal States<sup>17</sup>. As part of efforts to foster better inter-agency cooperation and coordination, RoLAC delivered procurement advocacy training for operatives of anti-corruption agencies (ACAs) and some law enforcement agencies (LEAs), towards improving their capacity to investigate and effectively build watertight cases for successful prosecution of procurement fraud. The training was delivered to 65 operatives and prosecutors (including 35 women) drawn from the EFCC, ICPC, FMOJ and the Nigerian Police.

The evaluation team is however of the view that outside the joint events organised by RoLAC, there is need to explore the possibility of other mechanisms at Federal and State levels for vertical and horizontal coordination among target Anti-Corruption Agencies (ACAs) and justice sector institutions.

RoLAC supported the training of Authorized Intelligence Officers on NFIU reporting resources and development of effective feedback mechanisms between ACAs and LEAs. It is however not clear

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<sup>16</sup> British Council PowerPoint presentation of component 3

<sup>17</sup> BC briefing and presentation, Feb 2022

how this information sharing between the NFIU and the Authorized law enforcement agencies' Intelligence Officers is to demonstrably curb corruption in Nigeria and /or the focal states for that matter. It goes without saying that, the fight against corruption is a complex one, hard to prove and must be tackled in a holistic manner. To exclude the reporting part in the chain of *report-detect-investigate-prosecute-adjudicate* makes it difficult to tackle adequately corruption in Nigeria (see Annex 12 for details).

### JC 2.3 Progress achieved under each outcome

Despite efforts accomplished on the operationalisation of the legal and policy frameworks (see JC 2.1), Outcome 1 cannot be considered as attained as the progress towards a timely and effective dispensation of justice is slow and the decongestion of courts and prisons remains challenging. Beyond the institutional constraints, many external factors may have contributed to this and increased the delays. First, the outbreak of COVID 19 prevented courts from sitting which impacted the caseloads. Second, the strike action by court staff led to closure of courts for a period of time, which caused further congestion. Lastly, insecurity in some parts of the country, Anambra and Edo for instance, and the nationwide EndSARs protest affected police formations and court processes in some jurisdictions.

Nonetheless, through ROLAC's support, visits to places of detention by Magistrates and the NBA (through the Police Duty Solicitor Scheme – PDSS-) have increased scrutiny of arrests/detentions, reduced time spent in police custody and increased due process safeguards for accused persons (see further details on results and compliance to reporting in Annex 12).

However, the information provided by the external experts along the 2 last years' assessments (2020 and 2021) mark an inertia on the average time on remand of Awaiting Trial Persons which remains at 968 days. These might also be attributable to the effects of COVID, and the EndSARs protest.

ROLAC has greatly invested in capacity building to enlighten the heads of justice institutions on the new laws and the processes/guidelines for operationalising them, and justice actors in focal states report to be more aware of the transformative implications of the new laws and committed to their implementation. Nevertheless, the indicator for output 1.3 records a low level of stated awareness and application of the ACJ law amongst Justice service providers, respectively at 28% for awareness and at 34% for application. The sheer volume and scope of the ACJA/L necessitates a piecemeal approach to awareness building and incremental implementation training for end-users.

**The Statement Taking Rooms (STR)** in police commands have enhanced the veracity of confessional statements and reduced incidents of coerced confessions and prolonged trials in serious crime cases as video recording of STR used in courts can testify of compliant interviews. The establishment of liaison persons between the MoJ and the Police has also helped to reduce delays occasioned by lapses in transmission of cases from the Police to the DPP.

**ACJL provision on timelines for issuance of legal advice** have improved efficiency and reduced delays in handling cases. The measurement of indicator 1.1 on the extent to which dispensation of justice at federal and state level is more timely, effective and transparent shows an increase of 12 points from the start of the programme, in the log frame matrix based on the expert' assessment.

However, **acceptance of plea-bargaining decisions and issuance of non-custodial measures** still require time and sensitisation for defendants and justice actors. Some provisions of the ACJL are a major break from previous entrenched practices in criminal justice administration. Actors are still adapting to the new rules, the areas of overlap as well as how their roles complement each other<sup>18</sup>. Even in Lagos, where these changes have been reported as positive and despite the existence of an automated Criminal Information System, the MoJ's representatives estimate that

<sup>18</sup> RoLAC reports and briefing backed up by declarations of DPPs, magistrates and judges in the FCT and all states



65% of cases are still not effectively processed and remain in docket congestion<sup>19</sup>. The registrar and judges of the High Court in Lagos told the evaluation mission that for the 7 months of 2021, among the 1179 remand cases they received, 524 were sent to courts. Only 58 inmates were released and 218 were issued bail.<sup>20</sup> Since its inception in 2020, Magistrates have resolved over 40 cases through the **restorative justice process**. The number of these cases remain low due to its novel and innovative process, which remains to be explained to defendants and to be accepted by magistrates as they consider it somewhat time consuming (see details in Annex 12).

ROLAC has also supported institutional development through capacity building and provision of tools like the CMS. This is already in use in some states, reducing case dockets while increasing access to justice. The CMS in Anambra has helped reduce delays at the High Court. It is also used as a tool to assess the performance of judicial officers. There is still much work to be done in mainstreaming the CMS across all the focal states, and in places where they already exist, implementing them beyond the state capitals and headquarter judicial divisions. The Case filtering systems used in Lagos and Anambra (Edo is still developing) is helping prosecutors sort out charges brought to the courts by the case and help eliminate civil cases masked as criminal cases (see details in JC 3.1)

RoLAC has helped to revive interest in sustained justice reform by **establishing the right legal frameworks for effective criminal justice administration** and raising awareness amongst the justice institutions on the opportunities for advancing criminal justice. RoLAC has also increased interface with the public on on-going reforms, through serialised primetime radio programmes in focal states. It also helped to introduce complaint boxes, placed in conspicuous places in the courts, to enable court users provide feedback for improvements in the administration of criminal justice. The 4<sup>th</sup> year expert assessment report (at the impact level) notes that there were slight improvements despite interruptions to judicial functions occasioned by COVID-19, security challenges in some states like Anambra and Edo, and the strike by the Judiciary Staff Union of Nigeria (JUSUN).

Many external factors continue affecting the justice sector:

- The lack of accurate figures on court backlogs;
- The lack of automated systems to process judicial data,
- Insufficient resources to ensure witnesses appearance in courts,
- Difficulty for judges to handle their cases based on evidence received from SARC,
- Public prosecutors' offices and legal aid offices understaffed,
- Problems of transport for offenders,
- Police's structural issues,
- Limited scope of case managements systems installed,
- Lack of digital systems to accelerate the treatment of cases (e-court, audio recording, e-libraries).<sup>21</sup>

Under outcome 2, ROLAC supported sensitisation and the implementation of various aspects of legislations and policies, which have an impact on women, children, Persons with Disability (PWD), and access to justice for indigent persons and vulnerable groups (see data available on the number of persons who had access to justice through the project – See Annex 12).

Collaboration with the NBA and the Legal Aid Council, especially around the PDSS has also meant increased legal representation for the indigent and vulnerable persons. ROLAC supported legal aid and the PDSS in all the focal states. Through these, private lawyers were stationed in police stations to offer free legal representation. This was particularly helpful during the lockdown. This approach has brought legal representation closer to indigent citizens.

The regular visit to places of detention by Magistrates (and NBA) has also helped in decongesting places of detention (See further details on this outcome under EQ3).

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<sup>19</sup> Meeting at MoJ Lagos on 23.02.2022

<sup>20</sup> Meeting with the Lagos State Judiciary on 23.02.2023

<sup>21</sup> Feedbacks received from all

Outcome 3 of the programme sought to strengthen the fight against corruption, namely by reinforcing mechanisms of Anti- Corruption Agencies (ACAs) to effectively address corruption in key thematic sectors: criminal justice sector, public procurement and the extractive industries.

Beyond outputs 3.1 and 3.2 described above, achievements reported and confirmed by the Stakeholders in the various State capitals on outputs 3.3, 3.4, 3.5 and 3.6 can be considered as partially to nearly fully achieved given that the qualification of “improved” for these outputs was broad and not specifically targeted the change to be considered.

#### Output 3.3: Improved transparency, accountability and integrity in the criminal justice sector

- FMOJ mandated Freedom Of Information (FOI) Units for all MDA. 264 MDA now have FOI Desk from 89 in 2018 following FMOJ’s directive.
- FOI Proactive Disclosure protocol developed. CSO have particularly benefitted from this and have requested more awareness raising events to capacitate all CSO in understanding and using these protocols.
- Justice Sector Reform Teams in one focal state provide citizens / clients information boards for the police stations and courts for increased transparency in these sectors. This is helpful in curbing endemic institutional corruption.
- Anambra state judiciary established Court Users Complaints Guide.

#### Output 3.4: Improved transparency, accountability & integrity in the extractive sector

RoLAC support to NEITI has been very productive and has capacitated the NEITI and relevant CSO in maintaining pressure on and ensuring that the extractive sector in Nigeria is more transparent in transactions and more accountable to the people of Nigeria. Issues regarding procurement processes for the provision of consultancy services and recurrent postponement of activities linked to the consultancy service, from one year to another due to the inability to provide a sector specific qualified consultant to the institution, has been an issue that hampered progress in this area. However, NEITI has been proactive and recorded some level of achievement with additional support from other donor partners that collaborate with them. The evaluation team is of the view that NEITI capacity has been enhanced through RoLAC and other donor engagements which has resulted in NEITI taking proactive actions as it relates to the extractive sector.

NEITI launched the Extractive Industries Beneficial Ownership Register thereby empowering state and non-state actors to hold better extractive sector actors to account, thus improving transparency and fairness. It is important to state that NEITI receives support from other donors that help NEITI in the development of their programme. RoLAC has leveraged on some of the activities in order to bring to fruition some of the progress achieved.

It is also reported that NEITI Civil Society Steering Committee has been reconstituted and now exercising oversight of the extractive industry in Nigeria<sup>22</sup>. Activities of the CSO revealed N2.6 trillion<sup>23</sup> owed government by some oil companies. This information will assist the FGoN to recover those resources.

#### Output 3.5: improved effectiveness, efficiency & transparency in the area of public procurement

At the State level, Bureau of Public Procurement (BPP)’s National Open Contracting Portal (NOCOPO) tool has made procurement processes more open, more transparent and fairer. Users of the NOCOPO have mentioned the transformation that this has brought to the management of public procurement.

Federal contractors’ reliance on the NOCOPO for information on the procurement actions of MDA speaks of confidence in BPP’s ability to act more equitably. As at July 2020, over 154 MDA, with 730 users who have uploaded procurement plans on the platform on behalf of their MDA. 19 253 persons

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<sup>22</sup> RoLAC Year 4 Report

<sup>23</sup> RoLAC results-based framework – 2021/22

have visited the Citizens Engagement Page since its launch in 2019. A misleading status of a project as 'completed' on the Adamawa Open Contracting Data was flagged by a CSO as "abandoned" leading to remedial actions by the state. This shows that not only are CSOs vocal and active in bringing such information to the attention of the authorities, but that the authorities are also listening and taking action.

Adamawa commenced implementation of their e-procurement, with 4 pilot MDA set to e-procurement cycle. Training on e-procurement is ongoing in the state. Adequate space for Public Procurement Agency remains a factor affecting progress. Adamawa for example has a new building provided by the State, but it needs to be furnished in order to accommodate them.

Lagos deployed new procurement tools including Audit Templates and Debarment Procedures. Kano has set up a Public Procurement Agency established under the law passed. Edo has a revised Public Procurement Law and implements e-procurement system for greater transparency, too. All contracts now subscribe to the Edo Public Procurement Code of Conduct, deploy Procurement Audit Template and Open Contracting Data Standards are functional.

### Output 3.6: improved capacity to prevent corruption through risk assessments & asset declarations

ICPC is currently implementing annual Ethics and Compliance Scorecards for MDA because of the ICPC's ACTU effectiveness Index.

More CSO are now aware of and using the FOI Act to demand accountability. More than 10 FOI cases instituted in Kano state alone within one year. The Kano College Sex Assault Case and the suspension of the director of the Projects Development Institute (PRODA) are examples.

The general achievement on Outcome 3 will be further described under EQ3 in relation to the programme's contribution to the fight against corruption.

Outcome 4 aimed to enhance civil society and media engagement on criminal justice reforms and in the fight against corruption. Grants supported by RoLAC enabled CSO to interact more with government agencies for better understanding their challenges and opportunities for collaboration on criminal justice reforms and the fight against corruption in Nigeria. However, Component 4 mostly took off after the midterm evaluation and its late commencement has reduced the impact foreseen on the criminal justice issues and AC challenges to tackle. It is however important to highlight that the capacity enhancement interventions provided for CSO including investigative journalists has heightened the confidence and greatly improved the capacity of the CSO in demanding and maintaining pressure on duty bearers' account for disbursement of funds as well as awards of contracts. Achievements on outputs and outcome 4 will also be further described under EQ3.

### EQ3. How has the project contributed to the sectors of access to justice and the fight against corruption in Nigeria?

#### **JC3.1 Progress achieved in developing procedures, systems, practices to improve Access to Justice and AC sectors**

##### Justice sector

This section addresses criminal justice procedures, systems and practices that have contributed to speed up the dispensation of justice in the criminal chain (Output 1.3) and facilitated access to justice for offenders and victims (Outputs 2.4 and 2.5).

Beyond the adoption and review of laws (see EQ2), ROLAC supported under Output 1.3, the development of systems, procedures and administrative structures to advance the priorities of the ACJ Law and complementary bills.

ROLAC supported the implementation of the plea bargain procedure, provided for in the ACJA and ACJL, through the development of the Plea Bargain manual and the training of prosecutors, magistrates, judges and lawyers on how its application. According to respondents trained, these have been helpful to decongest criminal cases. In Edo state, the programme also supported the development of a complaint policy manual and information boards within the Judiciary.

Standing Orders and Operational (SOP) Guidance Notes have been developed for the NCSA as well as guidelines for NCS COVID 19 response (which contributed to zero outbreaks during the lockdown) and on Custody Management for the Administration of Criminal Justice Monitoring Committees (see other examples in Annex 12).

All the focal states and FCT now implement regular oversight visits by Magistrates in line with the ACJA/L.<sup>24</sup> The increased participation of Magistrates in visits to places of detention had a measurable impact in decongestion and increasing access to justice for detainees (see records provided in Annex 12). The NBA has led on the PDSS through partnership with ROLAC, and thus collaborating with the judiciary and police in increasing access to justice.<sup>25</sup>

ROLAC has supported the Nigeria Police Force (NPF) with the development of Standards of Practices on a range of ACJA provisions (see references in Annex 12). This work resulted in the adoption of six Force Orders<sup>26</sup> in line with the new provisions of the ACJA and the Nigerian Police Act: on Arrest and Management of Persons in Police Detention and Custody; on Conducting Searches and Seizures; on Criminal Investigation; on the Conduct of Identification Parade; on Investigative Interviewing and on Search and Seizure.<sup>27</sup> RoLAC also assisted the NPF with the set-up of Statement Taking Rooms in Police Commands in Lagos, Adamawa, Anambra, and the FCT. The one in Edo is currently under construction.<sup>28</sup> These have recorded 982 confessional statements, which are now been used to avoid previously observed delays in courts for 362 of the cases that proceeded to trial.<sup>29</sup>

**ROLAC support for Case Filtering process** has reduced delays at the Department of Public Prosecution (DPP) and the High Courts and helped the prosecutors to look through cases brought by the Police at the Magistrate Courts to eliminate civil cases masked as criminal ones and eliminate ADR cases from the criminal cases (see example in Annex 12).

In Adamawa, the programme re-introduced the Bar and Bench Forum which helped lawyers and judicial officers talk through challenges to the administration of justice. For example, the issue of disparity in court fees in different courts was sorted and a uniform schedule of fees adopted.

**Case management systems are in place in Anambra and Kano** through RoLAC's support (see Annex 12 for details on results). In Edo, a case monitoring database and a Central Criminal Records Registry (CCRR) were introduced. The case management system is still being set up.

**Several process changes have also made access to justice easier for vulnerable persons in the focal states.** For most vulnerable groups and victims of violence, the formal justice system remains an expensive enterprise. The programme has therefore offered a strong operational support to facilitate access to justice mechanisms for the most vulnerable groups, namely by supporting the **Police Duty Solicitor Scheme (PDSS)**, the National Bar Association and the Legal Aid Council through expansion of first response assistance and legal aid of SGBV victims through SARC and SGBV Response Teams. Members of the National Bar Association have joined the PDSS after the trainings provided by ROLAC. Some of them however need mobilisation or motivation to continue or engage the PDSS. For those who have actively participated in the scheme, it has improved their relationship with the Police and their practical experience in legal aid provision.

<sup>24</sup> ROLAC Theory of Change, Component One page 1, BC's Annual reports and experts' assessment reports

<sup>25</sup> ROLAC Year 4 annual report, August 2021.

<sup>26</sup> ICRC cooperated with ROLAC and NPF on the adoption of one of the six.

<sup>27</sup> ROLAC Fourth Year progress report, page 17

<sup>28</sup> Experts visited the Edo Police Command (State CID) and inspected the site on 8 March 2022.

<sup>29</sup> ROLAC Year 4 Annual Progress Report and monitoring tracking of the RoLAC ToC Component 1



Some NBA members also joined the Magistrates in their oversight visits to police stations and places of detention. It has helped lawyers interact more with the Police and helped the Police to appreciate the utility of the PDSS. The police forces are now more willing to invite the lawyers when a suspect is not represented by a lawyer during their custody.

**From interviews with beneficiaries of the SARC and legal clinics**, RoLAC support has also helped to restore hope to indigent people, banish their fears of unaddressed legal wrongs and provide assistance in their quest for justice, mainly through Legal Aid Committees and VAPP committees. These helped indigent persons with court proceedings or settlements.<sup>30</sup> The awareness outreaches and legal clinics have deliberately targeted women and young girls and PWD to ensure that their interests are represented in the administration of criminal justice. The NBA and other VAPP Committees organised regular legal clinics in communities to enlighten citizens and offer pro bono legal services where needed.

ROLAC has also helped to set up family courts for the respective states as well to increase access to justice and the quick dispensation of cases, especially for cases involving children. In Adamawa, ROLAC helped increase access to justice by enabling more judicial divisions (details in Annex 12)

The creation of the SARC provided medical and psychosocial support and relief for SGBV survivors. SARC serve as one stop shop for SGBV survivors as well as platform for multi-sector collaboration for actors like the Ministry of Health, Ministry of Justice and Ministry of Women Affairs, CSO and Police. The field visits carried out by the experts in February and March 2022 to the SARC and other information allowed gathering the number of cases handled by the SARC supported by the RoLAC programme since their establishment (see Annex 12 for number of cases recorded by SARC).

The transition to legal justice through the SARC is still challenged by other factors in the justice system but the awareness and progression is tangible. The SARC, established under this programme, have received an increased number of survivors of violence. Although the prevalence of violence against women, girls, and children is still high, the reporting of SGBV remains low due to the stigmatisation of the victims according to specialised agencies and NGO interviewed<sup>31</sup>. The SARC however remain the most visible evidence of direct impact to beneficiaries.

The programme has also influenced the increase of prosecution and convictions of SGBV cases, through CSO's advocacy and judicial assistance, the designation of SGBV judges, the support of family courts and establishment of SGBV courts (in Adamawa and Abuja High Courts) – see rates of prosecution and convictions under EQ7 -. ROLAC also supported the **SGBV Response teams** and helped train their social workers as court assessors (for the first time in Nigeria). They also trained medical personnel as social workers and trauma counsellors to support the SARCs.

ROLAC provided **support for PWD** during court proceedings by training PWD on sign language and supported them to develop a directory of sign language interpreters to ensure PWD can follow court proceedings. The experts also noted that the programme enabled PWD to better coordinate and organise themselves, especially along their various clusters. Sign language interpreters now have an association, leadership, and structure for engagement. ROLAC developed a strategy for access to employment to facilitate inclusion of PWDs in employment medical and legal services.

In Abuja, an implementation framework for the Child Rights Act is in place. RoLAC is currently finalising the Practice Direction for Protection Order in SGBV cases based on the VAPP Act. ROLAC also supported the resuscitation of the Child Rights Implementation Committees in 3 focal states (Anambra, Edo, and Lagos), the development of Child Protection Policy in Kano and the establishment of Family Courts in Anambra and development of adjudication guidelines for handling

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<sup>30</sup> Based on feedback from and interviews with SGBV survivors in Anambra and Edo states.

<sup>31</sup> The Nigerian Demographic and Health Survey conducted in 2018 by the National Population Commission in Abuja reported that 31% of women aged 15 to 49 had experienced physical violence and 9 percent sexual violence. The Nigeria Violence Against Children Survey released in 2015 revealed that six out of 10 children younger than age 18 had experienced some form of physical, emotional, or sexual violence during childhood (with one in 4 girls and 1 in 10 boys had experienced sexual violence).

cases. The Child Protection Network in Lagos provided assistance to over 274 cases of child abuse. They have referred over 100 cases to NAPTIP, the Police and the MOJ. In all the states, the Child Protection Network is vibrant with rescue missions being conducted regularly to prevent child abuse and provide relief where it happens. ROLAC supported the establishment of National Sex Offenders Database managed by NAPTIP, with similar registers in some focal states (Adamawa and Edo, with the one in Kano yet to be launched) managed by the State Ministry of Justice.

The log frame matrix measured some improvements or regressions based on three indicators under component 2. The number of policy-practice changes introduced / implemented by justice service providers that enhance the access to justice and rights of women, children. PWDs and other vulnerable persons (including legislation passed and amendments to existing laws) have been progressing very slowly in comparison to the two other indicators on access to justice for women, children and PWD at federal level and in selected focal states, supported by the project and whose rights have been accessed through a legal process.

### AC sector

Progress has been registered under the AC component with the development of tools. Such as NOCOPO, E-procurement, mechanisms/initiatives such as the NFIU intelligence sharing mechanism to facilitate information sharing among relevant LEAs of ACAs both locally and internationally; the NACS which is the main anti-corruption coordination framework nationally and sub-nationally; including joint activities e.g. training, development of MOUs among ACAs. These tools developed with the support of the programme have prompted the thinking of most of the actors to do more to address corruption in the criminal justice sector, public procurement and extractive sectors have enhanced the working habit of users. However, this has not guaranteed the continuous use of those tools to bring about collaboration among ACA (see Annex 12 for further reading).

The RoLAC reports confirmed by interviews in the focal States show that about 77% of MDA had taken some actions towards implementing the NACS Action Plan. However, there was the need for further embedding of systems to ensure the full implementation of the NACS in MDA, particularly through the establishment of ACTU, Anti-Corruption Commissions, or the resuscitation of non-functional ones.

The ability of the programme to address corruption in the public procurement sector has been visibly enhanced. An assessment of the Action puts the figure at +6 points from baseline<sup>32</sup>.

The main achievements in the area of public procurement are as follows:

- Finalisation of a Debarment Procedure;
- Training of MDA on the use of National Open Contracting Portal (NOCOPO) and development of draft User Manual;
- National stakeholders' roundtables to review draft disclosure guidelines for mainstreaming beneficial ownership into federal public procurement;
- Private sector stakeholders' and CSO' consultations on open contracting;
- At the federal level, there has been joint BPP and ICPC training of key MDA ACTU Officers to double as procurement oversight mechanisms in MDA;
- Establishment of procurement councils in some of the States.

The focal states coordinators, CSO and public procurement agencies' staff seem very committed and enthusiastic about the programme. They have been the driving force behind the successes in the focal States and at the Federal level.

There is also the need to look into corruption cases not only outside target institutions but also within institutions, for instance, within the police, the judiciary and the MDA across board, in order to achieve outcome 3. However, the programme mainly looked at corruption or injustice cases coming from outside those institutions and therefore programmes were mainly tailored for that purpose.

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<sup>32</sup> ROLAC updated Logframe v41(Dec21)v5For EU ReviewTeam28Jan22v2corrected

Tools and mechanisms to rid institutions of endemic/ intrinsic corruption within those institutions are still required for progress to be made in fighting against corruption, both on the supply and demand sides, with CSO and citizens holding duty bearers to account.

The evaluators note the existence of resistance and turf fighting among both law enforcement and AC agencies, which affects coordination among the ACAs. This is mainly due to the lack of understanding that this is a common fight against corruption and laundering the proceeds of crime into the Nigerian financial system. While the criminals collaborate at all levels, the preventive and enforcement agencies continue to protect their territorial grounds. Enhanced awareness is needed to close this gap.

### **JC 3.2 Progress achieved in addressing the capacities and needs of CSO and citizens in the justice and AC sectors**

CSO were involved in the RoLAC programme, under its outcomes 2 and 4, to support the demand side of the three programme's priorities. RoLAC awarded 17 grants<sup>33</sup> to CSO to help them build capacity in these sectors, engage them in the provision of services and in advocacy actions in both justice and AC reform agendas. Civil society organisations who received grants from RoLAC, in the justice sector, achieved positive results in raising awareness on legal rights and sexual abuse at community level, providing legal counselling and other services for SGBV victims, or advocating for PWD's rights. These grants also enabled CSO to support states and citizens with publication of and access to financial information, public funds and resources. CSO and journalists in budget tracking, fact checking and investigative journalism to enable them to more effectively engage in investigating and reporting on criminal justice and corruption issues

ROLAC was however slightly below their targets on indicators that implied public engagement of civil society and government agencies in public dialogue on criminal justice reforms and anti-corruption policies.<sup>34</sup> This is partly because activities leading to outcome 4 did not commence fully until after the midterm and because of a challenging context prevailing in the anti-corruption sector.

The programme's achievements on CSO's support and involvement in advocacy and public engagement in each sector are further described below.

#### In the Justice sector

**Component 2** supported a harmonised approach around criminal legal issues and access to justice among government agencies and CSO and have improved their collaboration in these fields.

A list of CSO supported by RoLAC on the promotion and awareness of the ACJA/L, other criminal laws/codes and the legal aid system (see list in Annex 12).

NGO specialised on PWD's rights (see list in Annex 12) have consulted with relevant state authorities to advocate on the use of Disability Act/Law and to review policies in a more inclusive manner for PWD. They work with grassroot communities and leaders (including women) to advocate for PWD in their various communities and organizations. The actions of these CSO and Disability Clusters in other states (such as the Joint Association of Persons with Disability (JoNAPWD) have led to the appointment of disability desk officers in national institutions such as the Legal Aid Council, the National Human Rights Commission, the Police Command offices, the FCT High court or Anambra State Health Insurance Agency (ASHIA). Accessibility for PWDs in major government constructions has increased leading to the inclusion in malls and hotels of ramps and well-marked parking spaces for PWD.<sup>35</sup>

<sup>33</sup> Briefing Note for RoLAC Final Evaluation v 220131

<sup>34</sup> ROLAC Updated Logframe December 2021 and experts' assessment reports - Component 4, years 3 + 4

<sup>35</sup> Interviews with CSO mentioned. Feedback from PWD in Edo and Anambra states.

Other CSO active in access to justice have been empowered to support SGBV cases in the states and took sensitisation programmes to the grassroots levels, such as Women's Rights and Health Project (WRAHP), which provides related social services for GBV Survivors in Alimosho Local Government Area, in Lagos. While providing counselling and mediation services to victims of violence and referring SGBV cases to other institutions (such as the SARC), they also engage with local governments through community town halls and leaders (that the association has trained in the past) and raise awareness among the communities to make them aware on rights violations, also through social media, radio, etc.

The NGO Sexual Offences Awareness & Victims Rehabilitation Initiative (SOAR) considered RoLAC as supportive community developers. In response to the high number of SGBV cases during COVID, RoLAC helped them get movement pass, which enabled them respond to the 222 SGBV cases during the lockdown (See further details of SOAR initiatives and results in Annex 12).

### In the AC sector

The CSO in the focal states have been very instrumental and very much involved in the transparency and accountability in public procurement. They have devised strategies to follow-up on MDA that are having challenges in the e-procurement processes and procedures.

The programme **under its component 4** reached out to CSO and the media and provided them training as a group in different thematic areas. Those efforts were acknowledged by the CSO interviewed, for having strengthened the relations between the various civil society and the media in the focal States. All CSO interlocutors met have mentioned that the RoLAC programme was of immense help to them particularly concerning the training on the FOI Act and the training on how to seek and request information from the MDA. The CSO groups met, expressed how RoLAC through awareness raising and training, has helped them to find common grounds between the different groups and how this has been helpful by working together for stronger and more positive impact. CSO mentioned that through RoLAC support their knowledge of using the FOI provisions has been greatly enhanced. They however reiterated their interest in and need for deepening and expanding the knowledge<sup>36</sup> in the practical understanding and use of the FOI (freedom of information) Act, extending this to a wider segment of the relevant CSO communities.

The grant provided to the BudgIT Foundation facilitated the simplification of states financial data, making it accessible to the public and thus enabling the states (Adamawa, Anambra, Edo and Kano) to meet one of the conditions for the Disbursement Linked Indicator for the performance-based grant component of the World Bank-Assisted State Fiscal Transparency, Accountability and Sustainability programme (SFTAS). In addition, the social media engagements of Component 4 of the programme focussed on #HerStoryOurStoryNG<sup>37</sup> campaign initiated in November 2018, which has grown its social media, reach to over 80 million at the end of Year 4. This is benefitting Nigeria's largely youthful population that is using social media for social mobilisation.

CSO groups like BudgIT and PLSI have been supported by RoLAC to bring government budget information and audit accounts closer to the people of the focal States, in addition to other States, by simplifying the data for the public to understand. Local Governments are now calling on these two CSO groups to help them with budget and audit breakdowns<sup>38</sup> in their local areas. The work of BudgIT, PLSI and other similar groups has generally been picked up by the media and investigative journalists, which provides the opportunity for wider coverage for the people of country to understand and hold their community leaders to account. This was facilitated by the training provided to investigative journalists supported by RoLAC. CSO acknowledged that this training was very helpful and requested that more training be done so that other investigative journalists in the focal States can also benefit.

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<sup>36</sup> Interview notes (meeting with CSO group)

<sup>37</sup> The benefits of this demand side of accountability were confirmed by CSO interviewed in the focal states

<sup>38</sup> Year 4 Report 2021; RoLAC updated results framework 2021



However, it was reported that the impact would have been higher if the training for relevant CSO in the AC space had focused on training more journalists. The evaluators noted that some trainees were not investigative reporters thereby posing the question of its utility for to those who may not use it. Moreover, CSO expressed the need to explore the option of training trainers to train others thereafter and to continue the RoLAC programme with the same pilot States in order to consolidate the achievements that are yet to be well rooted.

**Under Component 4**, the public engagement of CSO by justice and AC institutions in criminal justice sector and anti-corruption reforms, more specifically in the law making or policy-review process, has been more challenging and occasional. There have been few structures or systems formalising regular consultation processes. The expert assessment report for Year 4 suggests that some engagements increased marginally in Edo and Adamawa States thanks to the facilitations and training programmes sponsored by RoLAC. In other places, engagements have remained the same or decreased because of paucity of funds.

In the justice sector, CSO working on PWD's issues mention issues with legislative accountability, as law and policy makers do not oversee the compliance of public and private institutions with the Disability Law/Act. Public engagement is difficult, as state government institutions need more capacity building on how to implement and monitor the provisions of the law. Moreover, local governments are not aware on how to engage with PWD.

In the AC sector, the RoLAC management team mentioned that CSO reported difficulties to dialogue with ACAs and the government, namely those working on budget and audit issues. The CSO had reported to RoLAC during a consultation taken place after the pandemic, that the government was less transparent and less open with public engagement, in particular during the last two years. These latter couldn't achieve their plans as they couldn't enlist the cooperation of key institutions in the area, mainly the Office of The Auditor-General and The Public Accounts Committee of The National Assembly.

However, some stakeholders such as the Attorney General's Office cooperated when the RoLAC programme was approaching its end. Some CSO reported to have mostly worked with ICPC while working on prevention, monitoring and tracking projects, reporting gaps in audits and in ensuring transparency in public finance. During our interviews, most CSO reporting threats to their safety and harassment experienced from representatives of public institutions and private corporations they investigate. For instance, investigative journalists are heavily controlled and not able to disseminate information in an independent manner. Some journalists trained by RoLAC were reluctant to accept small grants for further investigation because of these intimidations (see human rights section). In Anambra, RoLAC stated that it was difficult to identify journalists and few attendees were present at their meetings.

#### **EQ4. To what extent has the project strengthened the capacities of the various beneficiary Ministries, agencies and stakeholders?**

##### **J.C 4.1 Level of training, capacity building and other support activities delivered to all programme stakeholders**

###### Justice sector

Training activities were provided to all criminal justice institutions, coordination committees, agencies and CSO supported under Components 1, 2 and 4, with overall positive feedbacks or outstanding results. Few negative comments on these training activities were reported as impacting the work times of judicial officers.<sup>39</sup>

<sup>39</sup> For example, in Anambra there is a mandatory sit at home on Mondays. This leaves only a 4 working days week. RoLAC trainings take up 2-3 days and so leaves them with barely 2 sitting days in the week.

The ROLAC management team stated that they adopted multiple approaches to capacity development of beneficiaries. First, the training needs were identified in consultation with the target beneficiaries. Second, peer learning was also encouraged with and across the focal states.

The experts found that the trainings delivered by ROLAC had created substantial capacity building platforms for the partners. It provided them with a better understanding of the new legal frameworks in the state. A JSRT member stated, “The exposure with ROLAC has been helpful and impactful, especially from the angle of knowledge”.<sup>40</sup>

The workshops brought Magistrates in various states together for peer learning and sharing. Another partner observed that “outside ROLAC, you would barely find a situation where 10 Magistrates would come together to learn.”<sup>41</sup>

The capacity building initiatives had impressive outcomes especially around training on non-custodial measures and implementation of community services by the NCS (See Annex 12).

RoLAC developed mentoring programmes for the police on the provision of the ACJA, especially on remand, which has helped them achieve a level of decongestion in the cells and their cases in the courts. RoLAC also trained them on how to implement the provisions on recording confessional statements and supported key persons on how to operate the Statement Taking Rooms provided. RoLAC also supported the NPF on how to use the guidelines developed on investigative interviewing and criminal investigation, Standard Operating Procedures (SOP) on custody management and guidelines on the Stop and Search provisions of the Police Act (see details in Annex 12).

ROLAC trained Magistrates in the FCT who in turn trained Magistrates in the focal states on the oversight visits to places of detention. This has resulted in decongestion with over 1,610 detainees attended to and given bail, discharge or arraignment. ROLAC also supported with success, cross learning amongst the focal states through learning visits, namely exchange visits for various DPP to Lagos and trainings on the ACJL, Penal Code and Plea Bargain. These trainings were of tremendous importance and value to the prosecutors. Training of assessors that work in the family Courts helped to revive the Family Courts. Trainings on VAPP law also brought awareness and enlightenment to CSO and justice sector actors alike, as well as training on how to handle children in conflict with the law to increase their access to juvenile justice. All these have helped to speed up cases.<sup>42</sup>

However, the experts also found that ROLAC trainings had an unintended consequence of negatively impacting the work times of judicial officers, as they would not seat in court for the days of the training. In a place like Anambra where Mondays are compulsory stay at home days due to the insecurity, it means judicial officers have four workdays in the week and would spend more than half of those out of courts. On the other hand, lawyers and the Police complained that the duration of trainings could be longer than 2 days to ensure maximum impact on beneficiaries.

**Progress at state level often depended on the leadership** of the justice institutions and the extent to which they were welcoming the reforms. In states with progressive and reform-minded Chief Judges and Attorneys General, more results were recorded. In states where it was otherwise, the change was slower.<sup>43</sup> Additionally, in some cases, these trainings were one-off and not housed within those institutions. There were few instances of skill transfer (beyond knowledge sharing) and few trainings were cascaded within institutions. There were more results where there were follow up

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<sup>40</sup> As per interview with JSRT in Anambra on 3 March 2022. There are several innovations in the new legislations such as mandatory judicial oversight of places of detention, non-custodial sentencing, and plea bargaining that were novel to these judicial officers. The trainings helped to fill this knowledge gap.

<sup>41</sup> As per interview with JSRT in Anambra on 3 March 2022. Peer learning was greatly encouraged by the trainings and the judicial officers were able to compare notes on various issues and get comparative experience from other state jurisdictions on the new laws and good practices around them.

<sup>42</sup> Feedback from ROLAC on Component 1 trainings.

<sup>43</sup> Adamawa is a prime example. The experts found that the Chief Judge at the commencement of the project was skeptic about reform. Work therefore was stalled and slow until he retired and was replaced by a more forward-thinking judge.

trainings and activities, and use of the guidelines and templates developed, such as for the judicial oversight of places of detention, as the training was put to practice instantly after the training was done.

The evaluators noted most beneficiaries requested for more trainings. While this is useful, it is important to consider ways of institutionalising those trainings. So far, only the training by the NCS has been institutionalised. It is noted that as part of efforts to transfer ownership of the trainings to the institutions, the training manuals and content were handed over to the relevant authorities. The use of former participants as trainers from within the various institutions also helped to step down and solidify the knowledge sharing.

### AC sector

All stakeholders for ACA and the CSO expressed their satisfaction about the trainings received. Given the important number of trainings provided under Component 3 and 4, only a limited number of trainings are reported below.

Following the training and capacity needs assessment that was carried out in the MDA, a training plan was put in place and delivered through face-to-face and remote/online presentations. CRA for example took many weeks to complete from phase 1 (one) through phase 3 (three).

Overall, the timing of the training allowed participants to continue their work without long interruptions. The RoLAC training/capacity enhancement has been carefully thought through and has been built upon other trainings offered in the field for ACA institutions, after carefully examining the teaching materials of CRA and Investigative Journalists training.

The training of Procurement officers from planning through to the award of procurement, using the e-portal has also been a great success and a visible sign of promoting transparency in the award of contracts within the public procurement service. Some vendors (private sector) have been, and are currently undergoing training to use the portal. Unfortunately, no meeting was held with the private sector to corroborate this information. Trainings received by the MDA on E-Procurement is being used by the agencies.

The Code of Conduct Bureau and Code of Conduct Tribunal have received several short trainings in segments, which they are using in their investigation techniques. The Code of Conduct Bureau (CCB) and Code of Conduct Tribunal (CCT), during their respective interviews, however, have requested special training tailored to their specific needs e.g. training for registrars and other members of those Agencies. CCT has also made special request for tools that will help them put the training they had to appropriate use. The CCT expressed appreciation for the opportunity to benefit from the RoLAC programme, as this is one of the first to include them in such an important endeavour.

The NFIU received training assistance from RoLAC on the automation and digitalisation of its systems, in particular on the use of its Crimes Record Management System (CRIMS) software together with 60 authorized officers from LEA, ACA, and regulatory bodies. It was reported to have been useful and helpful to the agency in carrying out its mandate<sup>44</sup>.

Programme stakeholders reported more needs to be done to consolidate the gains e.g. more training for the National Strategy Committees in the focal States, as well as the M&E Committees for better oversight. More also needs to be done for CSO to continue to maintain the pressure on public officials to account for their service to the States. CSO mentioned that the investigative journalist training was not sufficient and that more investigative journalist needed to have the training, which was very helpful for them. This training has helped some journalists to win awards with their short stories. The training on FOI is being used by CSO to make FOI requests. This has helped CSO put pressure on MDA to release information on their budget and specifically on contracts being awarded.

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<sup>44</sup> Year 4 Expert assessment report, August 2021

## JC 4.2 Level of performance observed at institutional and operational level

Evaluators have been able to partially assess the level of performance achieved through declarations and perceptions of beneficiary institutions and a few post-training evaluation (PTE) reports provided by the RoLAC programme (10 reports). These reports allowed RoLAC to assess the usefulness, impact and relevance of the workshops and the extent to which the learning acquired during training was applied by participants in their work practice. Results obtained are more focusing on individual skills than institutional performance but provide information on the value of the training delivered.

### Justice Sector

The experts noted that most heads of justice institutions and relevant committees have improved in awareness and capacity about implementing the new laws. Justice actors also reported to use more frequently the guidelines and templates developed under RoLAC for the implementation of the new laws. RoLAC's trainings continued to address capacity gaps where they were identified and the process of developing implementation guidelines with the justice actors has increased their assimilation of the new frameworks.<sup>45</sup>

The CMS and case filtering systems in various states is relatively new and still mostly located in judicial divisions in the state capitals. The institutional challenges to the justice sector and institutional capacity of the actors continue but RoLAC's support has enabled them to tackle one challenge at a time.

For instance, Police is severely under resourced to conduct adequate investigations, also by lack of forensic capacities, which undermines the effective prosecution of cases by the MOJ. The tools and training developed for the police by RoLAC were linked to problematic aspects of police practice and part of what fuelled the ENDSARs protests. The use of these materials has helped to re-shape the opinion of some complainants and accused persons on the professionalism of the Police. The Inspector General has directed the police to integrate all the documents into the Police training college curriculum. This will give the Police an opportunity to extend the trainings to other Police officers coming through the system. The STR supported by RoLAC have enhanced prosecution of cases in compliance with the ACJL. They have however not been working optimally in Anambra state because of the insecurity crisis there. In addition, the high turnover of Commissioners of Police (CP) in Anambra has hindered work with the Police and progress with the justice sector. RoLAC resorted to institutionalising their directives by requesting the CP to document the directives as part of handover notes to their successors.

RoLAC supported the establishment of Legal Aid Coordinating Committee across the 5 focal states. Over 4000 persons have received legal aid through this initiative. However, most state Legal Aid offices are grossly understaffed. The highest number noted by the experts in a state office was 5 lawyers in Edo (Adamawa had 4; Anambra had 2 lawyers and 3 volunteers). This number is too small to cover all the judicial divisions in the state or respond to the cases brought by the DPP and the Police in the various court cadres.<sup>46</sup>

In general, the institutionalisation of training programmes delivered by RoLAC and the development of existing relevant justice and security sector training, such as foreseen in the DoA under output 3 component 1, i.e. the National Judicial Institute, Institute of Advanced Legal Studies, and designated Police Training Institutions, have not occurred. The Prisons Training Institutions benefited from this institutionalisation and more recently, according to British Council, the Police Training Department on the custody management SOP. Further mentoring and long-term capacity building activities are therefore requested by programme stakeholders in the next phase.

<sup>45</sup> RoLAC Post-training evaluation report of Training on the application of the Administration of Criminal Justice Law in Anambra State delivered in November 2018 – October 2019

<sup>46</sup> RoLAC Year 4 annual report

Some magistrates, police officers and personnel from the correctional service staff who received training from the programme have become resource persons or trainers for their own institutions. However, the redistribution of training among peers was not reported in most other justice sector institutions targeted by the programme, and the transfer of knowledge to institutions with high staff turnover, such as the Police, would need to be further monitored. Programme stakeholders are still requesting ROLAC to train new judges and new appointees.

The capacity building work of ROLAC with CSO, under Components 2 and 4, improved their knowledge of the justice sector and its actors. CSO Grantees have been able to meet and interact with other partners working on other issues. They also received some institutional strengthening on project / financial management in link with the other EU funded ACT programme.<sup>47</sup>

### AC sector

All stakeholders interviewed, mentioned that the capacity building programmes provided by RoLAC greatly helped their operations, and have been very useful in their daily activities. For instance, the strategies, policies, tools developed to assist the public procurement agencies to use the procurement system have made work easier<sup>48</sup> for the users as well as facilitating the issues of accountability and oversight in the procurement process in the focal states.

Some beneficiaries have however mentioned that there is need to carry out a more robust capacity needs assessment for trainings related to: procurement; law enforcement financial investigations; investigative journalism; and complex anti-corruption investigations.

For instance, the CID police officers that are at the forefront of crime and the first port of call need to have more training in addition to the needed tools and logistics to undertake their activities on detection, prevention and enforcement of the law as it relates to the Anti-corruption ecosystem. The police need to be capacitated as to where to escalate corruption related information when it comes to their doorstep. Police need to be capacitated in the classification of crimes including corruption related crimes in order to have a seamless transition of corruption related information through to the appropriate ACA. The police, aside from their LEA activities need to have the capacity to serve as the appropriate intermediaries between the public and the ACA as they are everywhere (communities) and are generally the first port of call. RoLAC support on Corruption Risk Assessment (CRA) training provided has boosted the confidence<sup>49</sup> of the users even though they are still waiting for certification long after the training.

The support by RoLAC to the BPP is highly appreciated by the beneficiary institutions. NOCOPO is slowly becoming a household name. E-procurement training has eased the work of users in the States and slowly gaining traction in the MDA. All focal State Public Procurement Agencies are very happy and satisfied with RoLAC's contribution in the training they received for using the E-procurement. This cannot be reversed (all public procurement interviewees mentioned).

The capacity and structures for coordination and joint working amongst ACAs are more effective and more strengthened than before, but there is room for improvement. It was also noted that Institutional capacity of ACAs to investigate and prosecute cases and seize assets is strengthened due to multiple donor's capacity training activities including RoLAC.

RoLAC supported CSO capacitation as well as the increased capacity of the ACAs has resulted in citizens becoming more aware of the avenues for engaging with each other and demanding effective responses to corrupt practices. More convictions have been achieved, impunity seems to be reducing and public confidence in the ability of ACAs to address corruption is slowly solidifying.

Transparency, Accountability and Integrity in the extractive industries and public procurement

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<sup>47</sup> As per interview with CSO in Abuja on 18 February 2022

<sup>48</sup> Stakeholder institutions interviewed

<sup>49</sup> Interlocutor in Edo



sectors – with better oversight mechanisms, are better capacitated and performing better today than before the RoLAC programme. Capacity of beneficiaries in Corruption Risk Assessment (CRA) has been strengthened and the few counterparts met who benefited from this training have expressed confidence in their ability to conduct CRA. They believe that without the certification, they are not allowed to undertake CRA in their institutions or other the MDA.

Investigations techniques have changed. The EFCC has made record recovery of assets in history since its establishment. This could not have been possible without the initial work from the NFIU. The NFIU's work is fed by the reporting institutions. NFIU and EFCC specifically mentioned that they are very well capacitated in the fields regarding corruption and laundering the proceeds of crime issues. They have already benefitted of intensive training and capacity enhancement from both international donors and bilateral agencies such as EU, UN, US, and UK. They would now like to be considered as local experts to assist the weaker ACAs.

In this framework, NFIU have requested specialised training and support on strategic analysis in areas such as extractive industries, environment, virtual financial crimes (such as SIM card cloning), local intelligence sharing network, and training of trainers on AML to deliver training to focal persons and induction training to new recruits. They also need assistance to train other stakeholders on reporting standards information that is sent to NFIU.

The EFCC Academy now provides specialised training in investigative and prosecution skills of crimes such as corruption and other economic and financial crimes for both EFCC, law enforcement entities, anti-corruption agencies and MDA within and outside Nigeria. To build a new EFCC Academy in Abuja, 3 billion Naira has been allocated for the year 2022. EFCC receives complaints and reports online, and it has a hotline devoted to receive such information.

EFCC has adopted a Strategic Plan (2021-2025) in line with the National Anti-Corruption Strategy centred on the five pillars of Prevention, Public Engagement, Ethical Re-Oriented, Enforcement and Sanctions, Recovery and Management of Proceeds of Crime. It also plans to develop a corruption prevention strategy. In this framework, EFCC would prefer to be also considered as a direct partner in the follow up phase of RoLAC in order to implement its strategy.

**EQ5. To which extent were gender, human rights and conflict sensitive principles and measures reflected and mainstreamed in all phases of the project management cycle?**

**JC 5.1 Extent to which cross cutting issues were incorporated at formulation and inception phases**

The DoA<sup>50</sup> formulated for RoLAC expressly outlined the inclusion of cross cutting issues within the programme and its compliance with the European Union Gender Action Plan 2016-2020. There was however, no reference to specific gender issues in the problems' analysis and no reference to national strategic documents (National Gender Policy 2007 and National Gender Policy Strategic Framework (Implementation Plan) 2008-2013).

**Gender equality and empowerment of women** were planned to be mainstreamed through Component 2 to enhance access to justice for women, through the implementation and enforcement of relevant legislation and the establishment of structures and frameworks assisting and protecting women, girls and boys. The action also planned to build the appropriate institutional set up and coordination between the different law enforcement and welfare agencies mandates focused on gender issues, namely by training police, judges and legal practitioners to address the specific needs of women and children.

Beyond the adoption/domestication of the VAPP Act, and other relevant SGBV laws, their

<sup>50</sup> Description of Action

dissemination and awareness process in cooperation with CSO, many capacity-building activities were planned for the justice sector and the provision of gender friendly services and initiatives guaranteeing access to justice by women and victims of gender-based violence.

**A rights-based approach (RBA)** was also integrated within the programme, with particular focus on the rights of the most vulnerable groups, including rights of persons living in poverty, female victims of violence, children and persons with disabilities. The DoA underlined that the RBA will be implemented by empowering the rights holders, raise awareness on risks, relevant laws and policies as well as protection mechanisms and by strengthening capacities of duty bearers to protect rights.

The programme design additionally sought to build Nigeria's ability to investigate, prosecute and adjudicate crimes, including on corruption, and to respect due process and rights of defendants. The focus on corruption was considered key for Nigeria to promote and protect citizen rights. However, **there was no specific conflict sensitive** measures foreseen in the programme design.

**JC 5.2 Extent to which cross cutting issues were mainstreamed during programme implementation by British Council and stakeholders (throughout activities, delivery of outputs and management procedures)**

During the field mission, in all states visited, the Consultant's experts have usually observed, an even gender representation in the meetings. Gender balance was promoted and emphasised in the participation of activities. RoLAC paid attention that gender balance was factored in throughout the male-female representation at training events. Sex disaggregated data was applied throughout implementation and reporting, although not indicated in the logical framework matrix<sup>51</sup>.

Overall, and mainly **under Component 2 and Component 4**, the RoLAC programme highlights a good performance in mainstreaming rights-based and gender equality principles and measures throughout substantive and managerial aspects. In line with the initial design, the programme has effectively applied a gender perspective by enhancing access to justice for vulnerable and marginalized groups, including women, inmates, children, and Persons with Disabilities (PWD), in line with the European Union Gender Action Plan 2016-2020 (see EQ2 and EQ3). Moreover, refer to Annex 12 for reference materials developed by the programme on Gender equity.

**A rights-based approach** was also integrated, mostly in components supporting access to justice, capacity building of duty bearers, empowerment of right holders, support to law enforcement and protection mechanisms, with focus on the rights of the most vulnerable groups, including rights of the defendants, persons living in poverty, victims of violence, children and persons with disabilities. The programme has specifically emphasised the inclusiveness of PWD in supporting different CSO activities specialised in the field and when supporting advocacy for the enforcement of "disability" laws, namely with the inclusion of sign language experts in most courts to increase access to justice for PWD<sup>52</sup>.

Across all the states, women working in MDA and CSO have played vital roles in the implementation of the programme and the delivery of outputs. The implementation of the VAPP law has been driven mostly by women groups and the Committees set up by the law.

The SARC have been utilised as channels for providing access for women and PWD (who are more often undocumented victims of SGBV). RoLAC has also invested in providing conducive facilities for children in conflict with the law and the revival of family courts<sup>53</sup>.

Rights-based principles of inclusion, participation, non-discrimination and transparency have been mainstreamed and applied throughout activities and programme management. Despite the complaints reported on the lack of consultation for experts' ToR or content of trainings, the evaluation experts noted that beneficiaries were consulted in drawing up annual workplans by RoLAC and

<sup>51</sup> RoLAC annual programmes refer to the number of male and female attending training sessions.

<sup>52</sup> Feedbacks from state agencies, CSO and project beneficiaries.

<sup>53</sup> Experts' assessment reports – Component 2 – Year 2 to year 4

attended validation of those workplans. There were twelve PSTC meetings organised from June 2018 to November 2021. Close consultation process was reported by stakeholders with State coordinators, who are resident in the focal states where they work.

Gender issues have been less mainstreamed throughout the training and assistance delivered to ACAs and CSO in the anti-corruption sector. The expert assessment report on component 3 for year 4 (2021) found “that the interests and peculiar needs of vulnerable persons and groups have still not been mainstreamed or specifically protected by anti-corruption mechanisms” and that “the ACA have not consciously mainstreamed or factored these peculiarities into their procedures and processes, which may sometimes prejudice vulnerable individuals and groups.”

**JC 5.3 Extent to which cross cutting issues were monitored and evaluated, and extent to which corrective/adaptive measures were taken to improve their integration in the programme**

**Cross cutting issues** are regularly monitored and assessed by the programme through the different monitoring systems put in place by the IP. **The RoLAC annual reports** indicate how promotion and inclusion of gender rights, human rights and rights of PWD have been dealt with, namely under components 2 and 4. This regards support for advocacy to implement various laws and practical measures supporting the rights of persons with disability, children and women rights in the different states. Experts’ assessment reports conducted every year are including a specific section on cross cutting issues, surveying the accessibility and quality of services by people of different backgrounds irrespective of gender, age, disability, ethnic background.

**The first-year report** was used as a baseline assessment for all components, relying on a qualitative methodology and open-ended questionnaire, with a focus on the respect by state services of the gender equality and human rights principles. As well as application of relevant laws (VAPP, CRA, PWD legislation) to all justice users, and the current status of access to justice and rights for vulnerable groups (women, children, PWD). The following annual experts’ assessment reports continue reporting on cross cutting issues and attribute some scores under component 2 for each output (See further details on scores under Annex 12).

Although a list of risks has been identified in the M&E strategy and those risks are stated as being regularly assessed every three months, there is not much reporting on these risks and their mitigation actions in the annual reports. Human rights concerns or issues were also surveyed during the annual external assessments and most cases have been raised under components 3 and 4. For instance, the experts’ assessment reports on component 3 for year 2, 3 and 4 state that the key human rights concern that continues to feature is the indirect discrimination of disadvantaged and vulnerable individuals and groups whose peculiar needs and interests are not mainstreamed throughout anti-corruption mechanisms and laws. Conflict sensitivity has also not been sufficiently mainstreamed into the programme and assessment of risks encountered by CSO’s work with survivors of violence, namely community helpers and SGBV victims threatened by perpetrators have not been taken into account by RoLAC<sup>54</sup>. The harassment behaviours (financial bribes) or other types of reprisal or abuses against CSO active in the AC field should be further thought through and discussed with CSO grantees and responsible agencies.

## 2.3 Impact

### **EQ6. To what extent has the programme achieved the overall objective and an actual change in the justice sector reform and the fight against corruption?**

**JC 6.1 Identification and degree of changes / early signs of impact produced or visible at institutional and operational level in both sectors**

<sup>54</sup> These risks are not reported in the annual reports.



As noted in the mid-term Evaluation report, the indicators for assessing the achievement of the overall objective are too broad and are based on the World Governance Indicators (WGI), which indicate virtually no change in their measure since the base year of 2014. These indicators embrace effects far beyond the scope or capacity that RoLAC can influence. RoLAC is also operational in only 5 of the 36 states, plus FCT. The more appropriate indicators were set at the outcome level, but here too RoLAC activities represent but a small part of the overall picture.<sup>55</sup> The scope of these indicators could be better limited to RoLAC's contributions in the locations where it is working.

**The overall objective can only be achieved through sustained efforts**, and the provision of advice, training and equipment delivered during 5 years under the first phase of the programme is not yet sufficient to achieving the common goal to “*Enhance good governance in Nigeria by contributing to strengthening of the rule of law and curbing corruption in Nigeria*”. However, the RoLAC programme has yielded apparent initial changes and early signs of impact in both the justice and anti-corruption sectors.

#### In the justice sector:

The changes and early signs of impact perceived in the justice sector reform that have been directly influenced by and can be attributed to the programme were reported by beneficiary institutions and CSO as follow:

- Most states have designated specialised judges or courts to try SGBV cases and set up family courts in the respective states as well. This evidences that the impact of the trainings conducted by RoLAC have influenced the judicial system.
- The increased participation of Magistrates in conducting visits to places of detention had a huge impact in decongestion and increasing access to justice for detainees.
- The police in most focal states using the Statement Taking Rooms more regularly for serious crimes.
- Magistrates visit places of detention more regularly and report to their heads of Court.
- The CMS and case filtering systems in various states is relatively new and remains mostly located in judicial divisions in the state capitals. Heads of Court and DPPs are increasingly aware of the utility of CMS and are interested in operationalising them within their jurisdictions. In places where they are functioning already, the numbers indicate significant reduction in case and court congestion.
- The Statement Taking Rooms supported by RoLAC has enhanced prosecution of cases in compliance with the ACJL.
- The judiciary was provided with necessary regulatory framework based on a model Practice Direction and Regulations for the operationalisation of courts during public health emergencies. This helped them to continue providing judicial services during the lockdown without endangering public health.<sup>56</sup>
- Before RoLAC support, Adamawa had only one functional judicial division, with one other skeletal division. RoLAC assistance facilitated the creation of three additional High courts divisions. This has had a direct impact on public access to justice and considerably diminished case processing time from 3 to 4 years to approximately one year at present.

RoLAC and other development partners have contributed to the following changes in the justice sector, throughout their respective assistance

- There is improved dispensation of criminal justice through the implementation of the ACJL in all the focal states. Structures needed to operationalize the various justice sector laws are all in place and stakeholders are engaging meaningfully to address justice sector problems and challenges in the focal states.
- The ACJMC, JSRT, VAPP Committee and Child Protection Networks (CPN) meet regularly to discuss changes and issues in the administration of Criminal justice.

<sup>55</sup> EU RoLAC Midterm Evaluation Final Report, page 20.

<sup>56</sup> RoLAC Fourth Year progress report, 2021, page 21

- Sensitization on SGBV carried out has been impactful to beneficiaries including traditional rulers (VAPP) and secondary schools (SGBV).

In the anti-corruption sector, evaluators note that some practices in the AC space have started changing with the trainings provided to the staff of the public procurement agencies at both national and sub-national levels. Namely in relation to embracing and using the tools provided for the modernisation of procurement processes for the purpose of transparency, accountability and integrity in the system. In addition, the process for the procurement of goods and services places high premium on cost and quality. Where possible, costs have been negotiated downwards<sup>57</sup> with some vendors that provide ongoing services like hotels, travel agencies, etc.

All counterparts were very positive about the technical assistance brought to them by RoLAC, which has visibly affected the work of most ACA who have been left on the brinks for a long time without any State/Federal level funding.

According to RoLAC reports and confirmation by the counterparts in the field, the main following changes stem from the following information and elements:

- NOCOPO is now being used by a total of about 154 ministries, departments, and agencies (MDA), with 730 users who have uploaded procurement plans on behalf of their MDA. Following ANEEJs compliance ranking and advocacy, 173 MDA are now making their procurement information available on NOCOPO.
- Convictions recorded by EFCC between Januarys to March 2021 were 389 against 642 cases filed in courts. For ICPC the data from January to December 2020 shows 26 convictions against 73 cases filed in court (the 2021 figures are yet to be approved for the ICPC. Requests have been sent by the evaluation team to the ICPC in this direction. The CCB only one case and one conviction.
- ICPC recovered 82.57 billion in 2020, while its 2021 figures have not been published. The figures for EFCC are still under contention and verification. None reported for CCB.
- Capacity building and training of CSO and media professionals on the FOI and investigative reporting has also enhanced the work of these organisations and yielding positive results and awards.

However, as underlined in Experts assessment reports for Year 3 and Year 4 on Component 3, these improvements in the AC sector are not only to be attributed to the RoLAC programme, but also as a contribution building on the material support and capacity building initiatives led by other development agencies.

<p><b>JC 6.2 Level of changes and impact observed and achieved for final beneficiaries: CSO, citizens, vulnerable groups, media</b></p>
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In the justice sector

The following are the immediate levels of change and early impact that end beneficiaries reported as observed or achieved:

- The Police and the Judiciary cooperate to provide better judicial scrutiny of arrests and detentions by the Police. This has resulted in bail and release from detention for many suspects.
- The NBA, through the PDSS, has built better relationship with Magistrates and the Police in providing legal aid to indigent persons.
- Suspects are less prone to torture or coercion in providing statements as the focal states have increased usage of the Statement Taking Rooms
- Family Courts have increased access to justice particularly for cases involving children.

<sup>57</sup> Briefing Note for RoLAC Final Evaluation 31.01.2022

- ROLAC supported organisation of legal clinics at local government levels justice and legal representation at grassroot level, improving access to justice for vulnerable persons, including increased provision of legal aid through LACON and the PDSS.
- The establishment of Commissions for PWD at the National Level and at state level (Anambra and Lagos) fostered inclusion and a sense of belonging. It also created a platform for them to engage on justice issues that affect PWD.
- ROLAC helped the various Disability cluster groups and JONAPWD to organize themselves and coordinate activities of PWD. Sign language interpreters now have an association, leadership, and structure for engagement. The development of guidelines for disability employment strategies by the focal states led to increase the number of PWD employed in those states by the government.
- The establishment of SARC have been a direct source of succour and hope for final beneficiaries.
- The Lagos state Chief Judge expanded the judiciary's restorative justice programme by including restorative justice in the Lagos Multi-Door Courthouse (LMDC) programme. This facilitates the use of diversion mechanisms and alternatives to prison sentence i.e., non-custodial measures, probation, community service and sentencing with rehabilitative or correctional objective.<sup>58</sup>
- Internal impact of the project for some CSO was that working with ROLAC improved their knowledge of the justice sector and its actors. Grantee meetings by ROLAC also helped them meet and interact with other partners working on other issues. They also got institutional strengthening on project / financial management and on monitoring and evaluation.
- Sensitization on SGBV carried out has been impactful to beneficiaries including traditional rulers, secondary schools, trade unions and women working on markets.

In the AC sector, early signs of impact noted are as follow<sup>59</sup>:

With initial support from RoLAC, ACAs in Focal States have been instrumental in leading the process of developing their own strategic plans and now own it. They are currently supporting this through their existing institutional arrangements.

NACS and FOI driven by FMOJ, NOCOPO by BPP, ECS and ACTU Effectiveness Index by ICPC, Beneficial Ownership Register by NEITI are few examples of actions that have changed and will continue to change behaviours at both State and Federal levels. For instance, NEITI's establishment of the Beneficial Ownership Register of extractive companies is making a huge difference in accountability and transparency in business operations in the field of the extractive industry.

The BudgIT open States portal is also a major milestone achievement with the RoLAC support. This portal serves as a data repository for public finance documents such as budgets, audit reports, budget implementation reports, which gives opportunity for citizens to access and interact with government officials especially at the finance and budget offices. Each state has its unique identifier portal, which is managed by representatives of the budget or planning commission<sup>60</sup>.

Institutionalised demand-side structures by non-state actors ensure continuity like NEITI Civil Society Committee and FOI-Coalition partnership at national and state levels are very active in the field. For instance, the "story lines" of the investigative journalists have led to review of contracts and State authorities following up on constructions in some local communities in some of the local States. As confirmed by the media personnel met in some of the focal states. An interviewee in Anambra declared that "The investigative reporting training organized in 2019 by the Premium Times Centre for Investigative Journalism (PTCIJ) supported by RoLAC, was of great assistance to those in attendance, some of whom have won various awards with the stories they wrote after the training. It's one of the reasons RoLAC is known in every nook and cranny of the state".

<sup>58</sup> ROLAC Fourth year progress report, page 20

<sup>59</sup> Briefing Note for RoLAC Final Evaluation 220131 – confirmed by Interlocutors in the various States

<sup>60</sup> Interview with BudgIT

## 2.4 Sustainability

### EQ7. Which modalities have the programme put in place to ensure continuation of net benefits after the intervention ends?

**JC 7.1 Programme interventions on capacity development and skills enhancement are likely to be integrated into the organisational structure of beneficiary institutions and part of their working practices**

**ROLAC has tried to ensure that the relevant justice institutions, departments, and agencies warehouse on-going reforms.** All the templates and guidelines developed under ROLAC are reported as validated and domiciled within the various institutions for the operationalisation of the laws. Justice actors report that the technical assistance ROLAC has provided through training, development of tools and templates have been partially integrated in their functions.

However, as discussed under EQ4, **trainings remain to be developed into modules and curricula and handed over to heads of institution.** In the justice sector, except for the NCS, they have not been sufficiently mainstreamed into the relevant training institutions of all the justice actors, although recently the Police has taken some steps in that direction. In the AC sector, Trainings undertaken with the support of RoLAC and other collaborating partners are on the way to being embedded in the partner institutions – e.g. CRA by the Anti-Corruption Agency of Nigeria (ACAN) or the NACS M&E by TUGAR.

**Given the usual dearth of capacity and expertise within justice sector institutions,** especially with new recruitments, they all required the need to continue receiving expertise to sustain successful operations.<sup>61</sup> Throughout the assessment, the experts noted the requests for training and more re-training. The dependence of some of the institutions on this project for training and their clamour for other technical assistance suggest that their budgetary support might not sustain those trainings outside ROLAC. Turnover rates in some institutions as the Police also create a concern as trained personnel can be relocated without notice and new persons deployed. This makes it imperative to consider ways of institutionalising the trainings as much as possible. The mid-term evaluation report had already recommended that beneficiary institutions could be challenged to make budgetary investments in subsequent training to foster ownership and sustainability.<sup>62</sup>

**RoLAC hosted workshops for Justice Sector Reform Teams** in all focal states except Edo, to train them in project design, management, monitoring and evaluation, how to raise funds from a wide spectrum of traditional and non-traditional funders of justice reform initiatives.

**Capacity gap areas are usually linked and inter-related by partner institutions, with the structural and financial issues,** especially in cases where the institutions have not assumed ownership, have not been able to absorb or translate the knowledge acquired during the programme or could not match or follow up some initiatives with the necessary investments or resources. For instance, although the SARC are posting good scores for medical and psychosocial support to survivors, convictions on SGBV are barely reflective of the number of cases (see further details in Annex 12).

This low number is largely due to a myriad of issues including court delays, stigmatisation, intimidation and withdrawal by the complainant, for personal or financial reasons not to prosecute the cases. Community engagement, outreach and prevention at grassroot level has also not been sufficiently addressed under RoLAC<sup>63</sup>.

<sup>61</sup> EU ROLAC Midterm Evaluation Final Report, page 23 and stakeholders' interviews during this final evaluation mission

<sup>62</sup> EU ROLAC Midterm Evaluation Final Report, page 24

<sup>63</sup> Feedbacks received from the SGBV response teams and CSO having received grants from RoLAC, supporting referral of SGBV victims or providing legal and psychosocial counselling.

The sustainability of SARC remains fragile. In states targeted by the RoLAC programme, the staff working in SARC (doctors and nurses) reported to the evaluators that they are undertaking their duties for SARC as extra time and have not received incentives or additional salaries by the hospitals to carry out this additional work. As well as running costs are not supported by the hospital either and equipment is still needed. Funding issues and access to budget are reported in all focal states except in Lagos where the Domestic and Sexual Violence Agency (DSVRA) now is institutionalised and receives its own budget by the state government, when disbursed. An SGBV fund was also established under the Agency as well as a toll-free line.

Another area raising sustainability issues is the support provided by RoLAC to all coordination committees, for their quarterly meetings. In order to encourage ownership of these meetings by institutions, it is important that these costs to be progressively and partially subsidised by the state budgets. Advocacy for the institutionalisation of these coordinating committees and their support by the states' budget has not yet been addressed by the programme or the EU Delegation.

The CRA training was very well appreciated by those who received the training. However, beneficiaries need more clarity on the graduation and certification processes. The fact that over a year after graduation, there has been no information on both graduation ceremony and certification shows that the ICPC and ACAN lacked the capacity and tools to certify quickly those trained by them.

Even if due to COVID-19 restrictions the graduation ceremony could not take place, it is not clear why certification has not been accomplished. With the forthcoming National Anti-Money Laundering-Counter Financing Terrorism (AML-CFT) Risk assessment, the trained individuals could undertake the corruption risk assessment of their specific sector and/or agency, which should naturally feed into the National AML/CFT risk assessment. Knowledge gained and not used will certainly be impacted with time – as only practice makes perfect.

**JC 7.2 Contingency or transitional plans have been developed and are implemented to manage transition from support to ownership**

Contingency actions have been put in place by British Council under all components in order to sustain the achievements already made. Communication to the stakeholder institutions has been made about the end of the first phase of the programme.

Exit strategies/workplans were developed with specific tasks, designated responsibilities and timelines to be undertaken in the last six months of the programme. They describe how remaining actions need to be undertaken in order to consolidate the achievements under each component, and how the partner institutions may continue to work during the transitional phase before the start of the new phase<sup>64</sup>.

These exit workplans take into account the 1) Likelihood of a 'follow on' programme that includes the target work area, 2) the level of buy-in or commitment from counterpart agencies involved in this work area and 3) the capacity of partner agencies to continue with RoLAC initiated activities.

According to the exit plans, responsibility will be given to JSRT and heads of courts to manage the initiatives. In order to ensure their sustainability, RoLAC is providing the JRST with the capacity to develop reform initiatives, fundraise, and monitor and evaluate projects. Guidance is also being provided to enable them to take responsibility for sustaining the reform initiatives that RoLAC has supported in each state so far. RoLAC plans to have lesson learned discussions with justice institutions to ensure internalisation of the processes.

RoLAC is also supporting the criminal justice sector to develop four-year workplans to guide policy makers to prioritize and allocate public resources for criminal justice reforms in annual budgets. Adamawa and Anambra have developed drafts of these.

<sup>64</sup> RoLAC exit strategies developed on each component, received by email on 9 March 2022



ROLAC is working with stakeholders in the states to ensure their adoption.<sup>65</sup> However, the incentives provided to carry out some activities, namely those supporting the PDSS and visit to places of detention will need to be continued. Lack of logistics e.g. printing, copying and transportation for both police and magistrates to get defendants and/or witnesses to court remains a big handicap.

In the AC sector, there is need to further deepen these exit workplans and include the expressed needs of the target MDA and organisations for better appropriation and ownership. For instance, in Anambra State, which is in a transitional era, it will be good to re-strategise on how best to win greater approval of the incoming administration especially in the implementation of the anti-corruption strategy within the government MDA with the support of CSO. In Adamawa State for example, the State has allocated a new building to house the Public Procurement Agency, however the building stands without any furniture or equipment. This may need consideration going forward.

## 2.5 Added Value

### EQ8. To what extent has the project supported internal EU coherence and contributed to the coordination and the complementarity of EU activities, with the programmes of other donors in Nigeria, particularly Member States?

#### **JC 8.1 The objectives and interventions of the programme are coherent with other actions funded by the EU?**

Under the 11<sup>th</sup> EDF, the EU has been supported the security, justice and governance reforms of Nigeria, principally with the following programmes: the Rule of Law and Anti-Corruption (RoLAC), Managing Conflict Nigeria (MCN), Agents for Citizen-Driven Information (ACT), all three implemented by the British Council and the EU/UN Spotlight initiative implemented by UN agencies. The Experts' Team has not received information about other projects implemented in the targeted sectors. The National Human Rights Commission informed the Team Leader that they were funded by the EU, with UNDP, for a project over transitional justice in North-Eastern Nigeria and for their complaint center.

There has been collaboration between MCN and RoLAC, MCN assisting with equipment, running costs, mentoring and stipends for SARC personnel and SGBV Response Teams, established outside of MCN's three focal states, for other SARC in RoLAC focal states or SARC established previously by British Council (11 SARC). The EU ACT also enables to support the capacity strengthening of CSO for them to become more efficient, accountable and sustainable, mainly in relation to their strategic organisation, management, advocacy skills, governance, social and gender inclusiveness ( See annex 12 for more details).

There has been some cooperation between RoLAC and UN Spotlight Initiative in Lagos, FCT, and Adamawa on the support of SARC where both programmes are operating: on staff training, equipment, exchange of data collected on their respective information management systems (this latter with UNICEF only). Collaboration efforts of RoLAC with the other UN agencies was not successful. There seems to be some gaps in terms of harmonisation and standardisation of tools and data regarding the functioning of SARC (RoLAC) and one stop centres (Spotlight). The criteria for their establishment and administration are differing, as well as the referral tools used by CSO, the data recorded process on SGBV cases is also different although feeding the national GBV data reporting for the Federal Ministry of Women Affairs web platform / dashboard. Some tensions were reported between NAPTIP, responsible for the sexual assault register and the Ministry of Social Development.<sup>66</sup> There also seems to be duplication in the capacity building brought by UN agencies and RoLAC to the SGBV Response Teams, CSO, judges, police gender desks and family units.

Following interviews with the UN agencies and exchanges with RoLAC, the evaluation team notes that these coordination and harmonisation gaps seem primarily stemming from the ministries<sup>67</sup>

<sup>65</sup> ROLAC Fourth year progress report, page 21

<sup>66</sup> Feedback from stakeholders' interviews

<sup>67</sup> Women Affairs, Humanitarian Affairs, Health, budget and planning, Justice

overseeing the establishment of these structures, and responsible for setting the criteria of social and health response mechanisms. E.g., UN Spotlight has been informed of the impossibility to set up its one stop centre in Yola, Adamawa, only once the state government authorisation to do so was rejected due to the presence on the SARC set up by RoLAC. According to UNDP, the data collection process should be more unified as a technical group under the Ministry of Women Affairs has elaborated national indicators to rationalise the collection of data on SGBV cases. According to UN agencies, issues of staffing and budgets in states need to be further advocate with the responsible ministries and require a better standardisation process.

**JC 8.2 RoLAC is complementary to other projects implemented or assistance provided by other external development partners (EU MS and other donors/partners)**

Other interventions in the justice and anti-corruption sectors in Nigeria are mainly supported and implemented by the German cooperation, the Dutch Ministry of Foreign Affairs, NORAD, Italy, Denmark, ICRC, US INL, Canada, Switzerland, the Global Fund, UNAIDS, Mac Arthur foundation and Ford Foundation<sup>68</sup>. CSO and agencies implementing these projects often assist the same institutions and the same topics, namely ensuring the passage, domestication, review and enforcement of the ACJA, other criminal bills and protection laws (VAPP act, CRA), partly in the same focal states that RoLAC is operating. They also offer training to police officers, legal and non-legal practitioners, support to legal aid mechanisms and services for victims of violence, awareness and prevention on corrupt practices and support to ACAs. From interviews shared with other development agencies. RoLAC seems to have overcome apparent overlap among their respective programmes and activities, which were transformed into synergies and complementarities mostly in the justice sector. In the AC sector, ACA seem to receive more training, logistical and material support from other donors, which requires more attention for complementarity<sup>69</sup>. Synergies have taken place between RoLAC and different international and national partners to complement some activities in relation to the four programme components, which were initially planned by other agencies (See examples of these cooperations in Annex 12).

Less regular coordination has been observed with other donors and agencies active in both sectors, such as OSIWA, Ford Foundation, Mac Arthur Foundation or Partners West Africa for Nigeria (based on an INL funding), although informal contacts are established<sup>70</sup>. These partners have also developed broad programmes assisting the criminal justice system and the fight against corruption in similar and other states. The British Council will continue funding peacebuilding initiatives, as well as programmes empowering youth and women. As OSIWA and INL have provisionally suspended their funds in the justice sector, it can be relevant to review the impact of their programmes and consider some good practices that were developed in by these initiatives in other states. Mac Arthur will continue funding an AC programme of USD 10 million per year until the end of 2024, which enables the next RoLAC phase to create better synergy and further coordinate actions in both justice and AC sectors for external assistance to achieve common efforts in advancing both reform agendas. The previous donor coordination gathering UK FCDO, the US embassy and the EU, chaired by the British Council, is no longer active. EUD continues to have bilateral meetings with the US embassy mainly.

**EQ9. To what extent has the strategy and activities in the field of visibility, information and communication been effective?**

**JC 9.1 The Communication and visibility plan of RoLAC was implemented effectively**

The RoLAC programme has put in place a communication and visibility plan as well as a media strategy in line with the European Union (EU) Communications and Visibility Manual for External Actions. These have brought a good and effective visibility to the EU and programme goals.

<sup>68</sup> See mapping of donors' and development partners' initiatives in both sectors in the formulation study

<sup>69</sup> Stakeholders' interviews and Experts' Assessment reports Component 3 Year 3 (2020) and Year 4 (2021)

<sup>70</sup> These agencies were not referred by British Council as having partnerships with them, but their contacts were shared with the Team Leader on request.

The programme is well known among all institutions and organisations visited and by external development agencies active in the field of RoL. Media were engaged with CSO to build partnerships and ensure that their message got the broadest reach, namely under Component 4. During year 4 public awareness continued to rise in all locations, CSO active in the field of access to justice reported a 20% increase while anti-corruption CSO record a greater increase of 40%. Adamawa MDA reported a 20% increase.<sup>71</sup>

Visible signs are posted at RoLAC offices in FCT and the focal states, in front of initiatives established by RoLAC (e.g. SARC or Sexual Violence Response Teams). Recommendations from programme stakeholders were addressed for more visibility of Anti-Corruption signposts at the MDA in addition to the visibility of the EU as the sponsor of the programme. The programme helped to print several laws and other materials for the partners, provided to the experts' team, on which the EU logo is present. From the evaluators' perspective, banners, boards placed outside of offices and other projects outputs, also had sufficient visibility for the EU and other donors. However, RoLAC had no visible presence at the SARC in Adamawa, which was set up under the MCN programme (implemented by the British Council and funded by the EU) and has more visible support from the Pathfinders and the Spotlight Initiative.

**JC 9.2 Qualitative level of programme visibility and outreach to citizens, civil society, media.**

RoLAC supported the HerStoryOurStoryNg Campaign against SGBV and the #RapelsNoJoke Campaign during the 16 Days of activism and international women's day. This had massive online following and impact, grossing over 3.5 million views with 10,000 comments and 84.5 million reach on social media.<sup>72</sup> The experts noted that partners (including CSO) were consulted in drawing up annual workplans by RoLAC. They were also part of the validation of those workplans. The State coordinators were also resident in the state and maintained close contact with all the justice and AC actors. The only complaint was that feedback on reports and retirements were often delayed from the headquarters<sup>73</sup>.

The various fora and Committee meetings supported by RoLAC also established good communication platforms for the beneficiaries and partners. RoLAC covered a large number of media events or international days in relation to the programme's objectives, which beneficiaries are very thankful for, including non-targeted institutions (e.g. the National Human rights Commission). Legal clinics, community engagements and sensitisation programmes to various stakeholders ensured that the work carried out by RoLAC reach varied audiences and the grassroots. However, CSO and SGBV response teams interviewed stated that community mobilisation was not sufficiently addressed during the programme and required more support for community engagement, awareness and prevention work in both justice and AC sectors at the local government level.

There was evidently deliberate effort to include the media in most engagements with CSO. This helped to build partnerships and ensure that their message got the broadest reach. The organisation Isa Wali Empowerment Initiative (IWEI) reported that thanks to RoLAC, its Legal Empowerment Project (CLEEP) project, had allowed its paralegals to increase sensitisation and provision of legal aid cases, which led to wider reach and increase in awareness and response from 45% to 70%.<sup>74</sup>

<sup>71</sup> Experts Assessment reports – Component 4, year 4

<sup>72</sup> RoLAC Fourth Year progress report, page 64

<sup>73</sup> Field observations from the team and stakeholders' interviews.

<sup>74</sup> Experts assessment reports – Component 2, Year 3 and 4

## 3. Conclusions and recommendations

### 3.1 Lessons learned

- The RoLAC support to Justice Sector and Anti-Corruption Sector has not been able to improve the **interconnectedness of the criminal justice chain**; both sectors support has been majorly handled in silos. However, RoLAC had to deal with institutional competing agendas.
- The nascent establishment and/or revival of coordination committees established under the targeted criminal and complementary laws, and the extended time needed to capacitate them to implement reforms, has constrained the programme to reduce the scope **of the coordinated and sector wide approach** initially considered.
- Building synergy among actors to jointly decide over **targeted, specific and result oriented outputs** has proved to maximise resources and impact of the intervention and led to develop and apply a more structured and integrated approach.
- **The existing infrastructural gaps that limit the administration of criminal justice**, although beyond the scope of the programme, if remained unaddressed, can further undermine the benefits gained and negatively affect the continuity of the future intervention.
- **The lack of sufficient political commitment and budgetary investments** from states in on-going reform process have started and will continue to hamper the positive results achieved, namely those related to ownership of the justice and AC reform process.
- **Cross learning amongst the focal states** through learning visits and engagement of key resource persons in other places, were very effective and should be replicated in both components.
- **There is need to increase ownership** by partners over the programme and to manage their expectations through more sector-wide approach on the existing gaps and opportunities to develop and / or strengthen strategic plans or policies at state level.
- In order to **deliver timely and quality justice** to the people of Nigeria, the entire criminal sector from reporting, detection through investigation, prosecution and adjudication needs to be treated as a holistic chain.
- **The internal financial and procurement processes** of the implementing partner has not been convenient and satisfactory to expedite payments and reimbursements for programme stakeholders and remain to be adjusted in the follow up action to avoid counterproductive effect on project outputs and activities.
- **As SGBV cases are not making much progress in the courts**, advancing engagement from the SARCs through the courts and criminal justice system remains a priority, together with training of court assessors and prosecutors on handling SGBV cases.
- **The need for robust improvements** in data gathering is also critical, especially to inform policy development and improve resources on justice and AC sector issues.
- **The need to continue to support States** has taken steps to support the reforms.

### 3.2 Conclusions

#### Efficiency

The programme has been time-consuming and resource-intensive because the Project Implementation Unit and State Coordinators had to respond to the individual requests and needs of all institutions targeted. The decision-making process on programme planning and implementation has therefore been scattered among the different prerogatives and interest of institutions, and could not follow the harmonized and integrated approach, which is required from justice sector and anti-corruption in their respective sector policies. Moreover, the PSTC, mostly at federal level, were too broadly represented and therefore not adequate to carry out their orientation and monitoring functions effectively. There was not sufficient time for discussions on joint identification of key issues and shared priorities in both sectors.

## **Effectiveness**

The capacities of justice, AC actors and CSO, especially when strengthened within multi-stakeholder framework, have been significantly improved. ROLAC support has also enabled programme beneficiaries to participate in the development of processes and tools, which have sharpened their technical skills to replicate them in other areas, and in few cases, served as platforms for peer learning. However, despite their usefulness, a majority of training activities seem to have been organised as one-off activities, lacked complementarity across components, were not followed-up by mentoring programmes or were interrupted by the COVID and the endSARS events and were not re-initiated. There were few examples of collaboration with academies or training institutes of partner institutions that institutionalised training curricula and methods. Henceforth, most justice and AC institutions (i.e. supply and demand side entities) still require more capacity building support to further use or cascade down the knowledge and expertise provided/gained at an institutional level

The support provided by the programme to the various coordinating committees, established by law or with ministerial mandate, to lead and oversee the implementation of criminal justice and access to justice reforms at the federal level and in the focal states, has helped justice actors (including CSO) to better understand the roles, challenges, and limitations of other partner institutions. This increased partnerships among justice actors with positive impact for the benefits of offenders and victims of violence. However, the RoLAC support to Justice Sector and Anti-Corruption Sector seems to have been deployed in silos where each pursued activities independent of the other, which did not favour the already difficult engagement of the Judiciary on transparency and integrity matters.

The programme has promoted the inclusion and mainstreaming of human rights and gender equality throughout the implementation of criminal legal provisions and procedures, the diverse responses brought to justice needs of vulnerable groups, the adequate legal representation of offenders and assistance to SGBV victims. However, given the existing societal stigma and discrimination existing towards some vulnerable groups, there is a strong demand by relevant agencies and CSO to further advocate for gender and PWD's rights and further decentralise legal awareness and empowerment of victims at local government and grassroots levels. Moreover, risks encountered by CSO in the justice and AC sectors, as well as discrimination of disadvantaged and vulnerable groups and inclusion of their needs was not sufficiently addressed in the AC sector

## **Impact and sustainability**

Beyond the soft support ROLAC has provided, there are still many external factors, structural gaps and infrastructural issues, which limit the implementation of criminal justice, access to justice and AC reforms. ROLAC cannot tackle these gaps by itself. These gaps have undermined the effectiveness of the programme and will continue to do so in the following phase if they are not strongly addressed.

There are still systemic bottlenecks, especially regarding transmission and processing of cases along the criminal justice chain. Data tracking and case management initiatives that enable ease of sharing and follow up on criminal cases started to be developed, as well as procedures accelerating the treatment of criminal cases, by preserving the fair trial guarantees of offenders and increasing the application of alternative measures to detention. These initiatives are still perceived as new for a culture that remains punitive and requires further support to ensure long-term impact.

Very few state governments targeted by the programme demonstrate sufficient budgetary investment in the justice and AC reform process, which leads to unending 'shopping list' requests by partners and lack of ownership over reform process in which further investment from States is required. The RoLAC programme largely and visibly has changed the anti-corruption landscape in the FCT and the Focal States promoting transparency and accountability in the public procurement space. Established protocols and systems still need to be further concluded and embedded concerning full implementation of the NACS, and results achieved within the public procurement space in the MDA that are participating in this programme need to be further consolidated, such as the establishment of ACTUs in relevant MDA at the sub-national level.



Institutionalised and informal demand-side structures (coalitions, partnerships etc.) established by non-state actors ensure continuity of the programme results, favour empowerment of vulnerable groups on their rights, support prevention and monitoring of corrupt practices and foster advocacy on both justice and AC reforms. However, CSO engagement with justice institutions and ACAs on law/policy decision making and review, even though initiated through advocacy support and joint initiatives on access to justice referral processes and access to financial and public resources' information, is still not entrenched into the practices of national institutions. Support for investigative journalism around criminal justice issues and support of the reporting/complaint aspect has been missing due to the difficulty to engage the Judiciary on transparency and integrity matters. Moreover, confidence remains to be strengthened.

### **Added value**

Examples of close cooperative partnerships between development partners have proved helpful to accelerate and consolidate reform outcomes, in both justice and AC sectors, while complementing each other expertise in common areas of cooperation. These synergies and coordination efforts need to be more regular in order to leverage the results of the financial aid granted to both institutions and CSO, to enhance the ownership of the beneficiaries over the programmes supported and consolidate Nigerian justice and governance reforms' agenda.

### **3.3 Recommendations**

The recommendations below follow the order of the conclusions, which were developed and are addressed to the RoLAC programme, the national counterparts and the EUD:

To RoLAC and the EUD: In the phase 2 of RoLAC, the evaluation team recommends supporting the target institutions with a more harmonised and integrated approach, through increasing coordination and synergy among justice sector and AC actors. This could be done by rationalising the planning and decision-making process of the intervention over key common issues and shared priorities identified for each justice and AC sector or overlapping both sectors. These will be primarily addressed through the engagement and enhanced capacity building of existing coordinating bodies, which will co-design the workplans on behalf of their respective member institutions and take direct responsibility to lead and oversee the implementation of the reform policies throughout the programme's achievements. This is meant to ensure that the programme results are aligned with the strategic objectives of the institutions being represented and that the coordinating bodies execute their driving and coordination mandate over the justice and AC reforms.

To the Federal and state governments, RoLAC and the EUD: More investment and readiness to commit in both justice and AC reform processes are crucial to the efficient and effective implementation of the future RoLAC programme. The EUD should intensify its policy dialogue with the relevant federal ministries and the focal state governors to encourage further legalisation and institutionalisation of these committees, as well as their budget participation for material and logistic support of these committees.

To RoLAC and EUD: RoLAC capacitated institutions and their staff as well as citizens/CSO to build legal frameworks, processes and working tools, and heightened awareness and buy in amongst justice and AC actors on the potential impact of reforms in their work. These gains should be consolidated in the future phase of the programme and previous enhanced efforts sustained to strengthen and extend impact of the justice and AC reforms in the respective states. RoLAC phase 2 should develop a curriculum for training magistrates, justice and AC actors and institutionalise them with the state Judicial Services, the National Judicial Institute and ACA's academies, including mentorship, peer learning and monitoring programmes. For replication of good practices and transfer of knowledge in other states by institutions, the practice of embed technical experts within the institutions should be continued to facilitate the coordination and harmonisation of efforts.

To RoLAC and EUD: Provision of institutional strengthening and capacity development of institutions should be assisted with more infrastructure and equipment support in the next phase, increasing

digitalisation of targeted courts, justice, MDA and other services for victims to enhance modernisation, sustainability and accessibility of these services. Operationalization of data / case management systems and case filtering should be priority for the Judiciary and MoJ under the next action, following a thorough feasibility assessment of the existing environment and sustainability issues.

To RoLAC, EUD and partner institutions: Following MDA's experience to leverage additional support from other donor agencies in their pursuit to promote more transparency and accountability in their sector (e.g. public procurement & NEITI). It is essential for the future RoLAC in collaboration and close coordination with other donors active in both justice and AC sectors, to ensure capitalisation of gains by supporting the very needy institutions with the needed tools / equipment and specialised capacity building that will help in sustaining the efforts and bringing about change in behaviours. The same applies in the justice sector, where opportunities for synergies among international and national partners would reinforce the coordination between justice sector institutions and focus on the implementation of national strategic initiatives.

To RoLAC, EUD and partner institutions: The next phase of the programme should further strengthen the linkages between both justice and AC components in order to ensure a holistic approach to criminal justice reforms, access to justice and fight against corruption. Special attention should be paid to the entire criminal justice chain including its oversight. For instance, the programme should take into account the activities of the different complaint units and entities - established in law enforcement agencies, MDA, judicial services and independent institutions -, and to ensure how these are linked and interact with each other. These complaints and oversight units or entities should be further harmonised and some eventually mutualised for better impact.

To RoLAC: In parallel, grants to CSO should be increased in budget and time, foster joint initiatives among CSO and between CSO and institutions, enhance CSO role as agents of change and enable them to combine and improve service delivery, access to justice, advocacy and engagement with federal and state government. An earlier commencement of CSO programmes promoting accountability and monitoring of the reform processes would also increase impact and support for investigative, monitoring and reporting actions around criminal justice and AC issues. Conflict sensitivity should be further mainstreamed for CSO supported by the programme in the justice and AC sectors, in regards of the risks they encounter in their protection or investigative work (from perpetrators), and for the victims of violence and corruption acts they are defending. Mitigating strategies to reduce those risks should be discussed with CSO grantees and responsible agencies, namely to protect vulnerable persons from more discrimination and abuse.

## 5. Annexes to the report

### Annex 1: Terms of Reference

Will be added in the final PDF version

## Annex 2: Detailed evaluation methodology

### 1. General methodological approach

The final evaluation of the RoLAC programme was conducted over a period of 5 months starting on 24 January 2020, in five main phases: inception, desk, field synthesis and dissemination.

**Our overall methodological approach to the final evaluation of the RoLAC** are drawn from the requirements outlined in the ToR and based on the quality standards, principles and norms set out in the EU Better Regulations Guidelines.

The evaluation also took into account the instruments, manuals and tools developed by the EC to assist with the mainstreaming, assessment and management of gender equality, human rights and conflict sensitivity in EU programming and evaluation, *inter alia*, the Gender Evaluation Guidelines.

The RoLAC programme to be evaluated was primarily founded on the intervention logic presented in the logframe matrix of the Financing Agreement and its key performance indicators.

### 2. Reconstruction of the intervention logic (Theory of Change)

Based on the ToR requirements, and the need to aggregate the information withdrawn from the updated logframes submitted in the annual reports of the Implementing partner, the evaluation team proceeded with the reconstruction of an Intervention Logic for the RoLAC programme. In order to understand better the chain's results and cause-and-effect links between the inputs, activities, outputs, outcomes and impact of the action planned outputs and outcomes of the RoLAC.

According to the financing agreement, the RoLAC programme was anchored in the fundamental issues that hampered criminal justice reforms and the fight against corruption in Nigeria and intended to leverage apparent genuine political will to tackle these issues.

It meant to address the root causes of the problems **through a coordinated and sector wide approach**; recognising the interconnectedness of the criminal justice chain and the importance of involving both the supply and demand side in criminal justice reforms and the fight against corruption.

It sought to support the effective implementation of key established laws, policies, plans, while ensuring institutional capacity, in order to manage effectively the anticipated reform/change in place. It also aimed, by enabling civil society to exercise its role of watchdog on criminal justice and anti-corruption, and to initiate desired reforms to increase accountability in governance.

Civil society and the public in general, were therefore enhanced to contribute to changes in social norms and behaviour, by altering the parameters of socially accepted/sanctioned behaviour.

The ToR required the evaluation team to reconstruct the Intervention Logic (IL) of the action during the inception phase, based on the EU – Nigerian strategy and programme framework related to the action, the political and socio-economic context analysis and the first review of project documentation. The Consultant began to identify the different components of the IL by reference to:

- The objectives of the RoLAC, the Nigerian and EU related policies and instruments;
- The priorities and intended results identified in the EU-Nigerian National Indicative Programme 2014-2020;
- The project document, the financing agreement, project annual reports and other project documentation attached to the ongoing action.

**A diagram** was drawn up to present the preliminary analysis of the IL of the programme and emphasised the standard logical results sequence of the action (see Annex 3 – 1<sup>st</sup> diagram).

It also includes **the assumptions** on which the expected results are based. They were hypotheses about factors or risks that existed at the start of the programme and needed to be present for the planned outputs to be delivered and the outcomes and impact to be achieved. These assumptions were very limited and general in the project document and in the financing agreement. They were related to the success of the project on the commitment, active participation and close cooperation of project partners, as well as the quality of the project design, with consideration to conditionalities and sequencing.

Main assumptions were presented as follow:

- Fundamental issues hampered criminal justice reforms and the fight against corruption in Nigeria;
- The programme could leverage an apparent genuine political will to tackle these issues;
- The root causes of these problems could be addressed through a coordinated and sector wide approach, based on the interconnectedness of the criminal justice chain;
- Both the supply and demand sides in criminal justice reforms and the fight against corruption would be involved.

Additional assumptions were added in the logical framework later during implementation (see Annex 11).

Additionally, the Consultant was required to describe the **Theory of Change (ToC)** presenting a visual construction of the performance framework of the action. The narrative description focused on the design of the action, the implementation modalities, and the extent to which they have facilitated achievements/outcomes and initial impact.

**The Theory of Change of the RoLAC** was provisionally described as follow:

- If political will and commitment of government at Federal and States levels prevails to implement reform initiatives;
- If key criminal legislations are effectively implemented and justice institutions, procedures and systems are strengthened;
- If Nigerian-led institutional efforts are supported to strengthen accountability, transparency and integrity to combat corruption in key sectors;
- If incentives are provided for citizens, civil society, public and private sector to engage in the justice reform agenda and anti-corruption practices,
- Then, a comprehensive criminal justice legal and strategic framework will dispense timely and effective justice services and access namely to the most vulnerable groups;
- A coordinated and capacitated network of anti-corruption agencies and oversight organisations will contribute to promoting accountability of federal and state government measures;
- Nigerian citizens, civil society, public and private sector will be further engaged and empowered to participate to the change of the justice and the anti-corruption sectors reform;
- Henceforth contributing to enhance good governance and Rule of Law in Nigeria.

This diagram was further refined during the synthesis phase to assess the extent to which it corresponded to (or differed from) the reality. It was reviewed based on primary data collected during interviews and secondary data collected among the institutions.

**A revised and updated diagram** is developed in evaluation report to reflect the changes observed compared to the initial objectives and plans (Annex 3 – 2<sup>nd</sup> diagram)

### 3. Evaluation criteria and questions

The evaluation assessed the RoLAC programme using the **four standard evaluation criteria** of the Development Assistance Committee of the Organisation for Economic Cooperation and Development (**DAC/OECD**), required in the ToR and one **additional EU criteria** (see below).



Based on the preliminary programme assessment, the reconstruction of the intervention logic and the description of the ToC, the team proposed to refine the indicative evaluation questions formulated in the ToR, around a maximum set of nine evaluation questions (EQs) based on the criteria listed above.

- **Efficiency:** *will focus on the extent to which the intervention has delivered results in an economical and timely manner*

**EQ1.** To what extent was the organisational and management set up of the programme conducive to an efficient programme delivery?

- **Effectiveness:** *focused on the extent to which the intervention has achieved its objectives, and its results, including any differential results across groups*

**EQ2.** To which extent has the project achieved the expected outputs and outcomes?

**EQ3.** How has the project contributed to the sectors of access to justice and the fight against corruption in Nigeria?

**EQ4.** To what extent has the project strengthened the capacities of the various beneficiary Ministries, agencies and stakeholders?

**EQ5.** To which extent were gender, human rights and conflict sensitive principles and measures reflected and mainstreamed in all phases of the project management cycle?

- **Impact:** *focused on the extent to which the intervention has generated significant positive or negative, intended or unintended, higher-level effects*

**EQ6.** To what extent has the programme achieved the overall objective and an actual change in the justice sector reform and the fight against corruption?

- **Sustainability:** *focused on the extent to which the net benefits of the intervention are likely to continue after completion.*

**EQ7.** Which modalities have the programme put in place to ensure continuation of net benefits after the intervention ends?

- **EU added value:** *focused on the compatibility of the intervention with other EU and external donors' projects and on the extent to which the intervention brings additional benefits to what would have resulted from the intervention.*

**EQ8.** To what extent has the project supported internal EU coherence and contributed to the coordination and the complementarity of EU activities, with the programmes of other donors in Nigeria, particularly Member States?

**EQ9.** To what extent has the strategy and activities in the field of visibility, information and communication been effective?

The evaluation questions reformulated above were presented in an evaluation matrix inserted in Annex 4 with their associated judgement criteria, indicators, data sources and data collection and analysis methods.

#### 4. Evaluation methods and tools

Based on the ToR requirements and the objectives and scope of the evaluation, the evaluation team has applied an **evidence-based approach**, focusing on a mix of data collection and analysis methods, and using a combination of qualitative and quantitative, primary and secondary data, based on relevant and credible sources, internal and external to the programme, and described below:

- I. The quantitative /statistical assessment of the types of thematic assistance/support provided per sector area.

- II. The performance and results of a selected set of events conducted during the period of reference, including challenges and lessons learned, and
- III. The quality of a set of outcomes in terms of institutional strengthening and capacity development processes.

In this regard, three complementary levels of assessment were proposed for collecting evidence on the relevance, performance and other achievements against the results chain of the RoLAC Intervention Logic.

**The first level combined evidence-based data from primary and secondary information** collected and gathered, including annual reports, assessment reports, monitoring and evaluation reports including update log frames, results of interviews, and other external statistical documents obtained from national authorities/institutions or regional/global indexes.

**The second level focused on evaluating the performance and results achieved by the intervention in line with the criteria/requirements of the ToR**

The focus was on assessing the efficiency and effectiveness of RoLAC in compliance with the needs/request of the beneficiaries, the implementation arrangements of RoLAC support / assistance, the delivery mechanisms and procurement processes used in implementation and what outputs/outcomes have been generated by the intervention, and the extent to which impact (or early impact) has been identified and measured. The evaluation also assessed the underlying causes of under-performance/constraints where relevant, as well as any contextual/institutional factors that have affected RoLAC performance.

**The third level assessed the sustainability and added value of the RoLAC support provided**

The assessment included evidence on the sustainability of the institutional and capacity building support provided, and the extent to which the stakeholders who received technical assistance have engaged their peers and other organisations in their reform policies and processes (including CSO and media involvement).

The assessment highlighted the areas of added value and those requiring improvement. It also facilitated the identification of lessons learnt, conclusions and recommendations for strengthening/upscaling continued actions funded by the EU in the sectors of justice and A, and informing the preparation of the follow up RoLAC II action.

The collected and analysed data were used for tracking and measuring the achievements of all RoLAC programme components based on the indicators developed in the evaluation matrix for each evaluation question and judgement criteria. Indicators used in the logical framework of the RoLAC programme (in the financing agreement) are considered as references. The key performance indicators presented in the national strategies, their related operational plans, as well as SDGs targets under indicators 5, 16 and 17 of the 2030 Agenda were contemplated for comparative perspective.

### **Data collection tools**

The Consultant team intended to apply a mixed (quantitative and qualitative) approach for the assignment. From our tried and tested techniques, we have identified and applied a variety of data collection methods that were relevant for this assignment.

The Consultant team used the following data collection methods:

Tool	Description
First documentary analysis	The team identified collected and proceeded with a first review of secondary evidence on the political and institutional context and on the technical/cooperation framework of the EU support to the Justice sector in Nigeria (project documentation, strategic / programming EU documents, legal documents and external literature – see <b>Annex 6</b> ). Four experts already worked in Nigeria on previous or current programme related to the sectors of intervention and posted relevant archived documentation at the disposal of the Team in a shared database.
Mapping and analysis of stakeholders	The Team conducted a mapping exercise at inception phase that developed into an inventory of justice and AC institutions involved in or targeted by RoLAC at formulation phase, with a focus on interventions related to the criminal justice system, access to justice, the anti-corruption framework and public engagement on reforms. This was developed based on document sources collected by the experts' team. The stakeholders' analysis detailed roles/mandates, positions/ranks, specific sector of support and all other information relevant to overlap with mandate of other institutions or coordination / interaction processes established between agencies or institutions.
Coding grid for desk review	The team has developed a guidance to structure the desk review and facilitate the screening and analysis of the documents for the context/ legal/ and institutional background assessment (see <b>Annex 5</b> ). This coding grid has been used during the desk phase for analysis of the literature and project documents relevant to the RoLAC. It allowed identification of relevant quantitative and qualitative content of the in depth document analysis during the desk phase. This tool comprised general thematic categories relevant for answering the evaluation questions. This list of categories included the name of the category, a memo with the instructions for recognising in the text, particular instances of the overarching categories and sub-categories. Cross cutting issues were mainstreamed under each evaluation criteria.
In-depth assessment	The in-depth assessment of the documentation operated at desk phase and during the field mission aimed to: 1) Identify and collect evidence of the results achieved by the RoLAC action; and perceived changes among partner beneficiaries at output and outcome level; 2) Start developing preliminary responses to the EQs to be confirmed during field and synthesis phases; 3) Determine the limitations and issues facing the RoLAC in their implementation; 4) Identify hypotheses to be tested during the field and synthesis phases; and 5) Determine gaps to be collected and tested during further phases. Documentary evidence fed into the overall analysis and triangulation of data through the evaluation matrix.
Key informant interview guidance	The evaluation team has developed both structured and unstructured set of questions to guide the interviews with the stakeholders listed in the list of beneficiaries in order to engage programme stakeholders during the field phase on both sectors of intervention. They covered all topics targeted by the EQs, adhere closely to the OECD/DAC and EU framework for the evaluation criteria and questions, and advise which questions to ask according to the type of respondents (See <b>Annex 7</b> ). All these interviews allowed for documentation of the perception and understanding of the support to RoL and anti-corruption in partner countries by diverse categories of stakeholders as identified in the beneficiary list. These interviews also enabled the evaluation team to assess perceived inclusiveness and application of the Rule of Law, good governance and human rights principles, and the way cross cutting issues were translated into interventions and addressed the priorities of the RoLAC.
Guidance for focus-group discussions (FGD)	Given the large number of stakeholders involved in the programme, the team has requested the implementing agency to organise Focus Group Discussions gathering several CSO active in the same field or focusing on key thematic issues (fighting corruption, inclusiveness of PWD, etc.). Meetings were planned to convey project beneficiaries and organisations or institutions assisting them. These FGD were used to improve and understand particular groups and to explore the relevance of a particular type of intervention. This guidance was more suitable for discussions with several actors and helped capture the narratives of beneficiaries of the project on how relevant and impactful the programme was to them at institutional and personal levels, and within the contexts they operate without compromising security, confidentiality or any cultural sensitivities (see <b>Annex 8</b> ).

Tool	Description
Data summary matrix	This internal management tool was used to collect data and for tracking and measuring the achievements of indicators developed in the evaluation matrix for each EQ and JC. The findings gathered by the team was collected in this matrix, whereby data was organised by evaluation question and judgement criterion, under each data collection method (document review, interview, FGD, to allow for a joint, systematic sharing, crossed and analysis of the findings by all team members.
Evidenced-based matrix	Systematically to reference data sources for each EQ, Judgement Criteria (JC) and indicators of the evaluation matrix.

The experts respected the social and cultural context of Nigeria during the field phase. The team also respected the confidentiality of respondents and adapted the questionnaire to the audience targeted. The evaluation team used the developed evaluation tools above to collect and analyse substantive information towards answering the evaluation questions under the six evaluation criteria. In parallel, the team also verified that the final set of methods and tools was sufficiently comprehensive to ensure for adequate triangulation of findings, a high level of data reliability and validity of conclusions.

### Data analysis for evaluation

This evaluation covered a combination of data collection methods and sources to allow for adequate triangulation of findings from sources that are internal and external to the programme and that enabled different data analysis methods for answering the EQs.

The following **data analysis methods** were used to synthesise and evaluate the evidence-based findings:

Method	Description of Data analysis and Evaluative judgement (EJ) methods
Triangulation of data	<b>Triangulation</b> was used to strengthen the rigour of the evaluation and highlight any inconsistencies between document analysis, consultation’s findings and the perception of external parties on the benefits of the RoLAC cooperation. It was drawn from various direct and indirect sources to verify the concordance of the data collected: programme documentation, minutes/records of meetings, notes during Focus Group Discussions, but also external sources: reports from partner agencies, reports and official documents from national institutions and organisations, relevant national statistics, budget laws and related financial documentation, EU reports, notes of visits etc. Information relayed by individuals with a stake in the programme were carefully corroborated with other information sources to improve their reliability. The team tested and verified the preliminary hypotheses and findings while on the field. Triangulation/ cross checking of data collected with beneficiaries and stakeholders were conducted with British Council’s implementation unit staff in Abuja and state local coordinators at the end of the field visits and mission. Concept notes were required to national partners to summarise their learnings.
Attribution analysis	The evaluation team assessed the proportion of observed changes that can be attributed to the intervention evaluated and will measure and compare quantitative and qualitative indicators over time, and / or against the targets defined by each output and outcome. The assessed outcomes and possibly impact, were derived from this counterfactual approach and provide an estimate of the results / changes to be attributed to the programme’s achievements. In order to factor the attribution analysis, the Evaluation Team addressed questions on results that were achieved only under the support and influence of RoLAC, then comparing to the other initiatives and advancements the institutions or organisations had attained under other donors/ partners or national state assistance, when measurable.

Method	Description of Data analysis and Evaluative judgement (EJ) methods
Contribution analysis	<p>The evaluation team used contribution analysis as a method to assess the possible links between the EU/RoLAC support to RoL and AC and the outcomes anticipated in the IL and observed during evaluation. It was also employed, when it was impossible to determine causality of outcomes/impact due to the complex environment: political and socio-economic factors within which the programme was evolving, and where there were other influences and donors' support. This method is indeed appropriate when we cannot directly observe the counterfactual of the programme's interventions (what will be the case without these interventions) and cannot hold the context fixed (we cannot avoid that many events occur at the same time in the programme). Contribution analysis was used for those evaluation questions that were more related to the effects, the contribution and the performance of the programme in moving towards its expected outcomes and how the RoLAC interventions were influential in bringing about these results.</p> <p>The team of experts drew on their in-depth understanding and expertise of the justice and AC sectors in Nigeria and on their knowledge of change processes in justice and AC policies and systems to trace the results achieved by the RoLAC to establish the nature and extent of the impact (including unintended positive and negative outcomes).</p>
Comparative analysis	<p>The evaluation team assessed if whether changes that had occurred in the legal reforms, government policies, and in the management of justice and AC reforms were comparable with those brought about by other interventions funded by the EU and other donors, whenever possible.</p>

Following steps were taken to ensure a coherent synthesis of findings from the different evaluation methods described above.

- Each member of the evaluation team focused on its sector of expertise (justice and AC) while proceeding with all phases of the assignment. Despite their respective responsibilities on the formulation aspects, the two other experts contributed to collect data for their evaluation colleagues while not being able to cover all focal states.
- Findings of all five team members were collected in a data summary matrix (see below), whereby data was organised by source and evaluation question, to allow for a joint and systematic analysis within the team.
- The data collected by all team members was shared, compared and discussed once a week, in order to adapt the semi-structured interviews and other tools, crosschecked the findings at intermediary stages, and ensure uniform data-collection. These formal briefings fostered triangulation of findings and provided information for further improvement of the data-collection and analysis (to exchange more information on whether change had or not happened and if linkages need to be operated between the two sectors of information).
- After data collection, a fact-check discussion took place with the British Council in order to cross check the validity of some information provided by the beneficiaries and compare if figures or data are credible or verifiable.
- Although not foreseen initially, the experts' team added to its field mission the preparation of **two feedback sessions** with the key partner agencies on 14 and 15 March 2022. During these, sixty representatives of the justice and AC institutions attended (members of the PSTC and additional Civil Society Organisations – CSO -) provided their inputs on the new programme outline. They expressed some of the gaps and challenges observed during the 1<sup>st</sup> phase, and changes they liked to experience during the next phase.
- The evaluation team presented their preliminary findings during a presentation at the end of the field mission to the EUD and the Reference Group.
- An intermediary note was shared one week after the end of the field phase.
- In the final analysis, the evaluators passed judgement on each of the evaluation criteria. The evaluators' judgement was explained, data sourced, research methods specified, and evidence triangulated.
- The draft evaluation report responded to evaluation questions, mixing the different data sources and analysis methods, in order to make sure these strengthen each other towards clear conclusions based on different sources. The two evaluation experts analysed EQ 2, 3, 4, 6, 7 and 9 and withdrew lessons learnt from their findings. The Team Leader worked on three EQs



(EQ1, EQ 5 and EQ8) and contributed to other sections of the report, namely those related to CSOs' actions.

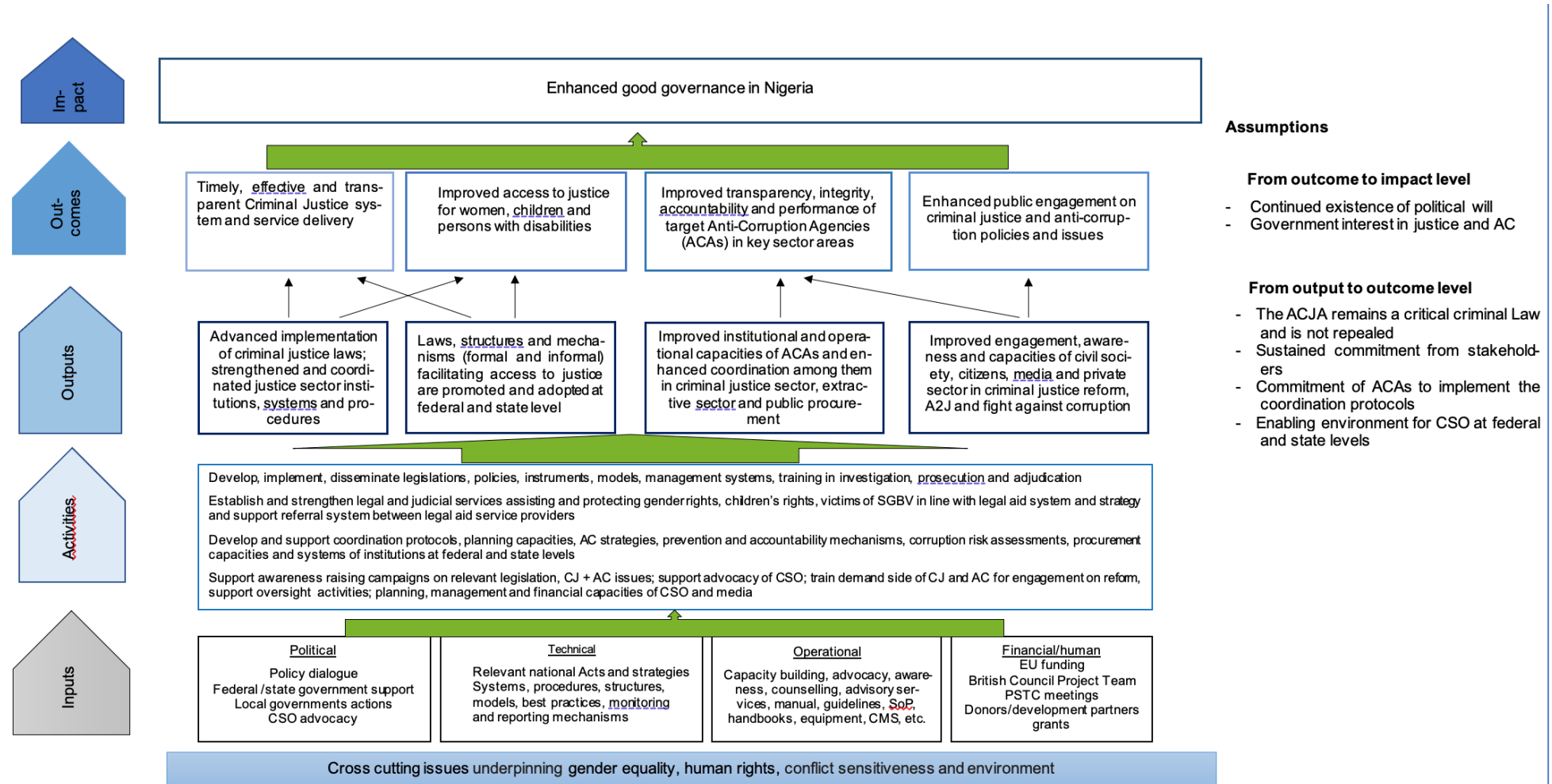
- Once the analysis and synthesis of data were conducted and summarised, the Evaluation Team developed their conclusions and recommendations in a **final draft evaluation report**, based on structure described in the ToR. The TL compiled all findings and finalised the draft and final evaluation reports.
- This draft final report also explores how the current action is responding to the objectives of the reconstructed Intervention Logic and the ToC and how the action can be reviewed by the programme management or improved through the formulation of the new action.
- Following the evaluation phase and the submission of the final report, a dissemination seminar organised with main counterparts and stakeholders will be organised to discuss findings, conclusions and recommendations.

**Cross-cutting issues** were taken into consideration and mainstreamed throughout the assignment: adherence and respect to democratic values, as well as all standards and instruments linked to the justice / anti-corruption sector: human rights, gender rights, diversity, governance, conflict sensitivity and principles of the rights-based approach.

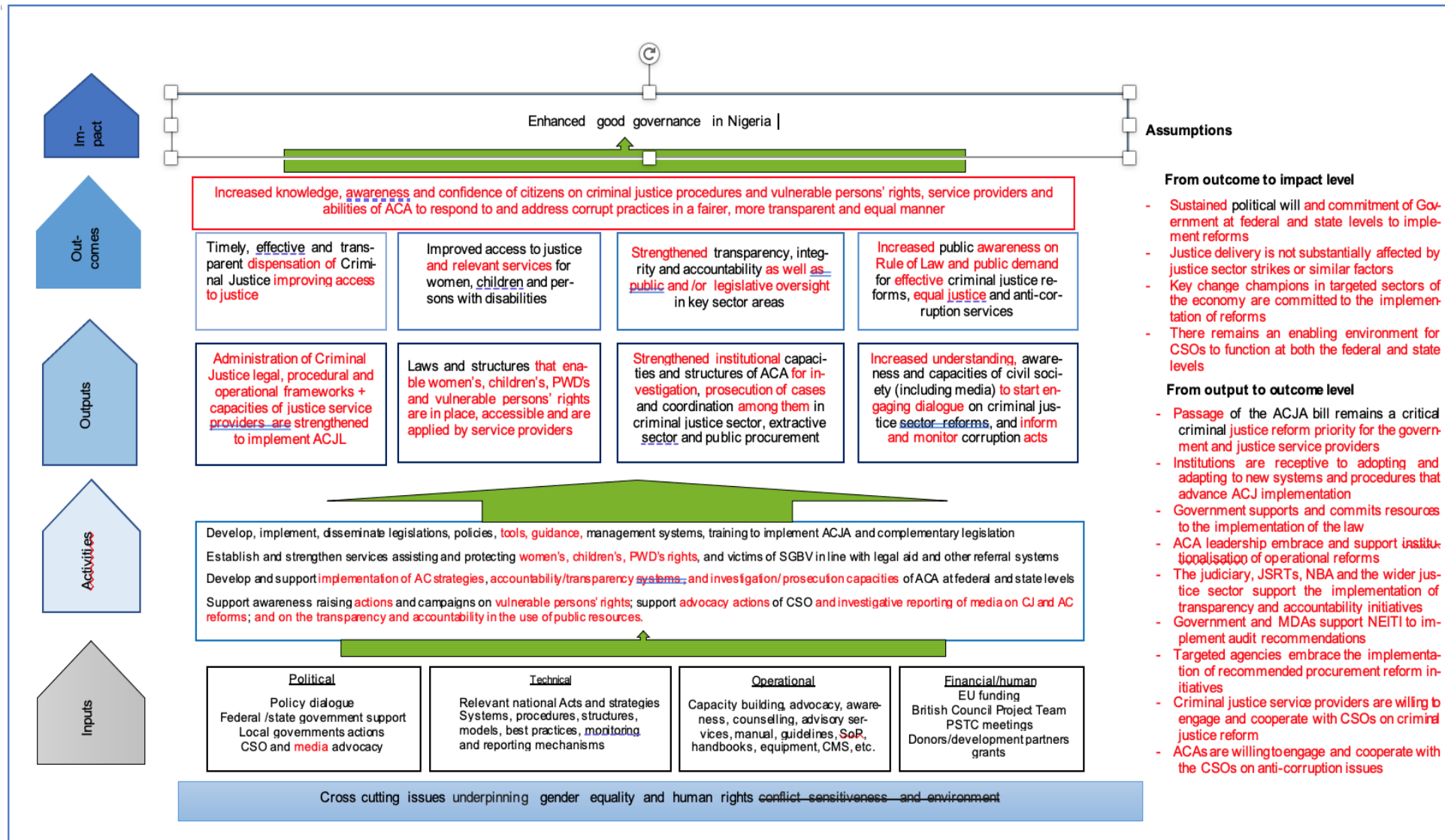
The evaluation assessed if these principles had been reflected in the design and implementation of the RoLAC programme and embedded them in all evaluation phases, criteria and questions as well as during the identification and formulation process of the new action. In particular, the team examined how the RoLAC Programme's interventions have contributed to the advancement of human rights and gender equality in the criminal justice /anti-corruption sectors reform process and how the Programme achieved to integrate right-based and gender-oriented measures within the programme results.

### Annex 3: Diagram of the reconstructed Intervention Logic/ Theory of change

- Initial ToC at inception phase (based on RoLAC formulation documents)**



## Revisited ToC at final evaluation phase (after analysis and synthesis of findings and based on RoLAC “ToC tracking document”)



### Annex 3 bis - Assessment of the reconstructed ToC at evaluation phase

Following the analysis and synthesis of our findings and based on the elements of Theories of Change that British Council is tracking for progress on each component, the evaluation team has reassessed the initial intervention logic of the programme and examined how its structure and sequence had evolved in comparison to the preliminary analysis that was conducted at inception phase.

Based on this review, we have updated the diagram of the ToC preliminary designed and underlined in red the changes that occurred in the results chain (see Annex 3, 2<sup>nd</sup> diagram). The modifications and changes are further described below:

The specific objectives / outcomes are less ambitious than initially planned, based on the progress effectively achieved. They are built on more realistic expectations but also better outline the emphasis on the supply and demand side that was initially described in the DoA but not apparent in the results chain. Indeed, a mainstreaming outcome linking and cross cutting the other 4 programme components can be clearly subsumed from the elements of change that were introduced throughout all components. This crosscutting outcome relates to the demand side focusing on increasing the empowerment of citizens and vulnerable groups on accessible criminal justice procedures, knowledge on their rights, availability of services supporting and responding to their demand for accessible justice services, equal justice and transparency.

The outputs under each outcome have also been changed their orientations and are more specifically targeted at the elements and services that were delivered. Outputs of the ToC as designed at final stage are more directed at strengthening legal and procedural frameworks, institutional and operational capacities of criminal justice sector institutions and ACA and service providers, as well as increasing public awareness and reinforcing CSO to advocate on justice and AC reforms. If we compare to the initial outputs for each component, the intended reachable outputs are less broadly defined and entail less advanced levels of achievements, namely concerning the improvement in the coordination of the justice sector institutions and ACA, and the engagement of CSO and media with the public institutions to influence on criminal justice and AC reforms.

As logically, derived from these revised outputs, the improvements sought under each component / outcome are also addressing results that are more specific. For instance, as the effective, timely and transparency of criminal justice service delivery was too broadly determined, it is more focusing on an improved access to justice through implementation of the relevant laws, procedures and practices of the justice sector institutions, linking both supply and demand side. It is observed that Component 2's objective is overlapping with the first outcome but it is more targeting vulnerable persons. As to component 3, which initially encompassed an ambitious intention, the scope of expectations have been reduced to strengthening (and no more improving) transparency, integrity, accountability and performance of ACA in the targeted sectors, based on the results obtained. However, the programme has also put more emphasis on public and legislative oversight actions to complement the lesser than expected progress made on institutional, operational and coordination capacities of ACA. As to component 4, the outcome has also not fully reached its intended purpose for public engagement but has enabled a reasonable progress in increasing public awareness and understanding on justice and AC reforms and enabled more confidence of CSO and media to start engaging public institutions on these issues.

Some initial assumptions, which have been aligned in the new diagram with those presented in the log frame matrix, such as the political will and commitment of Government at federal and state level. The commitment of key change champions in targeted sectors of the economy to reforms, can no more be considered valid conditions supporting the achievement of the programme overall objective and obviously reduce the impact researched.

## Annex 4: Draft Evaluation matrix – Inception phase - Final evaluation of the RoLAC

Evaluation Questions	Judgement criteria	Indicators	Methods and tools	Sources of information
<b>Efficiency</b>				
<p>1. To what extent was the organisational and management set up of the programme conducive to an efficient programme delivery?</p>	<p>JC 1.1 Staff allocation was sufficient to implement the action efficiently.</p> <p>JC 1.2 The managerial capacities and technical skills of the KE and NKE were appropriate to</p>	<p>1.1.1 Mobilisation of staff by British Council proportionate to the overall management tasks and activities to implement</p> <p>1.1.2 Level of human and financial resources dedicated to programme outputs by implementing agency and beneficiary institutions</p> <p>1.1.3 Costs / results ratio against programme activities / interventions</p> <p>1.2.1 Level of managerial and technical skills among management team and NKE</p> <p>1.2.2 Experts reports adequately addressing and solving the issues identified in both justice and AC fields</p>	<p>Document review</p> <p>Stakeholder interviews</p> <p>Focus Group discussions</p> <p>Triangulation analysis</p> <p>Attribution analysis</p>	<p>Annual narrative and financial reports</p> <p>Reports of experts</p> <p>Ministerial reports</p> <p>National statistics</p> <p>Stakeholders financial reporting system (NAO)</p> <p>EUD reports</p>



Evaluation Questions	Judgement criteria	Indicators	Methods and tools	Sources of information
	<p>implement this programme</p> <p>JC 1.3 The internal programme management and procurement procedures, coordination and monitoring mechanisms were executed timely and with quality</p>	<p>1.2.3 Level of absorption of programme inputs/resources by the beneficiaries (TA mobilisation and use of funds)</p> <p>1.3.1 Effects of delays observed in management and procurement procedures</p> <p>1.3.2 Level of adequacy of coordination (PSTC)/ monitoring and financial control system + risk assessment/ management procedures and mitigation measures</p>		CSO reports
<b>Effectiveness</b>				
<p>2. To which extent has, the project achieved the expected outputs and outcomes.</p>	<p>JC 2.1 Progress achieved in passage of laws and adoption/ implementation of policies / strategies</p>	<p>2.1.1 Level of advancement of key criminal laws and A2J adopted, and policies / strategies implemented</p> <p>2.1.2 Level of advancement of key AC law reforms, policies and strategies implemented</p>	<p>Document review</p> <p>Stakeholder interviews</p> <p>Focus groups discussions</p>	<p>Laws</p> <p>National policies / strategies</p> <p>Legal and strategic reviews</p>

Evaluation Questions	Judgement criteria	Indicators	Methods and tools	Sources of information
<p>3. How has the project contributed to the sectors of access to justice and the</p>	<p>JC 2.2 Progress achieved in terms coordination among justice and / or AC institutions</p> <p>JC 2.3 Progress achieved under each outcome</p> <p>JC3.1 Progress achieved in developing procedures, systems, practices to improve A2J and AC sectors</p>	<p>2.2.1 Level of cooperation among criminal justice sector institutions/ agencies at the federal and/between state level</p> <p>2.2.2 Level of ACA coordination among target agencies, including</p> <p>2.3.1 Level of benefits gained by target justice and AC institutions, in terms of effectiveness, transparency, accountability and integrity</p> <p>2.3.2 Level of benefits for CSO to engage in public dialogue on justice and AC reforms</p> <p>3.1.1 Level and quality of A2J initiatives and services developed for women, youth in conflict with the law, children and PWD</p> <p>3.1.2 Level and quality of actions addressing corruption in the criminal justice, public procurement and extractive</p>	<p>Institutional needs assessment</p> <p>Capacity gaps analysis</p> <p>Comparison analysis</p> <p>Contribution analysis</p> <p>Triangulation analysis</p>	<p>published by ministries / agencies/ academia/ oversight agencies</p> <p>Government reports at Federal and State levels</p> <p>Annual reports</p> <p>Reports of experts</p> <p>PSTC meetings minutes</p> <p>Stakeholders financial reporting system (NAO)</p>

Evaluation Questions	Judgement criteria	Indicators	Methods and tools	Sources of information
<p>fight against corruption in Nigeria?</p> <p>4. To what extent has, the project strengthened the capacities of the various beneficiary ministries, agencies and stakeholders?</p>	<p>JC 3.2 Progress achieved in addressing the capacities and needs of CSO and citizens in the justice and AC sectors</p> <p>J.C 4.1 Level of training, capacity building and other support activities delivered to all programme stakeholders</p> <p>JC 4.2 Level of performance observed at institutional and operational level</p>	<p>industries sectors</p> <p>3.2.1 CSO's perception on their engagement in CJ reforms and involvement in the implementation of laws supporting the rights of vulnerable groups</p> <p>3.2.2 Perception of CSO, media and citizens on the results they achieved in the fight against corruption</p> <p>4.1.1 Volume and quality of training and ToT programmes delivered to all target groups (justice and AC institutions, CSO, media, etc.)</p> <p>4.1.2. Extent of training monitoring and competency-based analyses conducted</p> <p>4.1.3 Improvements in infrastructure and operational processes due to interventions from the programmes</p> <p>4.2.1 Types of capacities and techniques improved by justice and AC sector actors thanks to</p>		<p>EUD reports</p> <p>CSO reports</p>

Evaluation Questions	Judgement criteria	Indicators	Methods and tools	Sources of information
<p>5. To which extent were gender, human rights and conflict sensitive principles and measures reflected and mainstreamed in all phases</p>	<p>JC 5.1 Extent to which cross cutting issues were incorporated at formulation and inception phases</p> <p>JC 5.2 Extent to which cross cutting issues were mainstreamed during programme implementation by British Council and stakeholders (throughout activities, delivery of outputs and management procedures)</p>	<p>the RoLAC programme</p> <p>4.2.2 Examples of quality interventions dispensed by justice institutions and ACA agencies</p> <p>4.2.3 Number and quality of interventions implemented or replicated in non-focal states</p> <p>5.1.1 Elements of rights-based and gender-based approach</p> <p>5.1.2 Elements of environment/climate change</p> <p>5.1.3 Elements of a conflict-sensitive approach</p> <p>5.2.1 Rights-based and gender-oriented measures developed and applied</p> <p>5.2.2 Environmental measures applied</p> <p>5.2.3 Conflict-sensitive measures developed and implemented</p>		

Evaluation Questions	Judgement criteria	Indicators	Methods and tools	Sources of information
of the project management cycle?	JC 5.3 Extent to which cross cutting issues were monitored and evaluated, and extent to which corrective/adaptive measures were taken to improve their integration in the programme	5.3.1 Rights-based and gender-oriented measures 5.3.2 Environmental measures 5.3.3 Conflict-sensitive measures		
<b>Impact</b>				
6. To what extent has the programme achieved the overall objective and actual change in the justice sector reform and the fight against corruption?	<p>JC 6.1 Identification and degree of changes / early signs of impact produced or visible at institutional and operational level in both sectors</p> <p>JC 6.2 Level of changes and impact observed and achieved for final beneficiaries: CSO, citizens,</p>	<p>6.1.1 Description of key changes observed in both justice and AC sectors</p> <p>6.1.2 Existence of unintended positive or negative results obtained</p> <p>6.1.3 Positive or negative impact of external factors on the component</p> <p>6.2.1 Perception of criminal justice institutions and their service delivery</p> <p>6.2.2 Satisfaction of vulnerable</p>	<p>Document review</p> <p>Stakeholder interviews</p> <p>Focus group discussions</p> <p>Contribution analysis</p> <p>Triangulation analysis</p>	<p>Annual reports</p> <p>Updated log frames</p> <p>Government documents at Federal and State levels</p> <p>Reports of experts</p> <p>PSTC meetings</p>



Evaluation Questions	Judgement criteria	Indicators	Methods and tools	Sources of information
	vulnerable groups, media	<p>groups and victims over access to justice services and structures supporting their rights</p> <p>6.2.3 Perception on evolution of corruption issues (integrity and compliance score card system)</p>		<p>minutes</p> <p>Stakeholders financial reporting system (NAO)</p> <p>EUD reports</p> <p>CSO reports</p>
<b>Sustainability</b>				
7. Which modalities have the programme put in place to ensure continuation of net benefits after the intervention ends?	<p>JC 7.1 Programme interventions on capacity development and skills enhancement are likely to be integrated into the organisational structure of beneficiary institutions and part of their working practices</p> <p>JC 7.2 Contingency or transitional plans have been developed and are implemented to manage transition from support to ownership</p>	<p>7.1.1 Level of ownership taken by beneficiary institutions and other stakeholders over the programme activities/ results</p> <p>7.1.2 Amount of sustainability provisions being stated and implemented by the implementing partner and national counterparts</p> <p>7.2.1 Effects of resourcing and financing on sustainability of laws, policies and procedures introduced / enabled by RoLAC</p> <p>7.2.2 Evidence of new or developed techniques and technologies which affect attitude and behaviour likely to ensure</p>	<p>Document review</p> <p>Stakeholder interviews</p> <p>Focus group discussions</p> <p>Attribution analysis</p> <p>Contribution analysis</p> <p>Triangulation analysis</p>	<p>Annual reports</p> <p>Updated log frames</p> <p>Monitoring reports</p> <p>PSTC meetings minutes</p> <p>EU reports</p> <p>Other donors' reports</p> <p>CSO reports</p>

Evaluation Questions	Judgement criteria	Indicators	Methods and tools	Sources of information
		sustainability of programme developments		
<b>EU Added Value</b>				
<p>8. To what extent has, the project supported internal EU coherence and contributed to the coordination and the complementarity of EU activities, with the programmes of other donors in Nigeria, particularly MS?</p>	<p>JC 8.1 The objectives and interventions of the programme are coherent with other actions funded by the EU?</p> <p>JC 8.2 RoLAC is complementary to other projects implemented or assistance provided by other external development partners (EU MS and other donors/partners)</p>	<p>8.1.1 Existence of linkages between RoLAC and other relevant EU projects.</p> <p>8.1.2 Level of coordination among EUD sections working on both sectors</p> <p>8.2.1 Level of complementarity and coordination with other EU MS's and donors' assistance in CJ, A2J and AC sectors</p> <p>8.2.2 Evidence of positive synergies and joint initiatives with EU MS and donors in both CJ, A2J and AC sector.</p>	<p>Document Review</p> <p>Stakeholder interviews</p> <p>Comparative analysis</p> <p>Triangulation analysis</p>	<p>Annual reports</p> <p>Monitoring reports</p> <p>PSTC meetings minutes</p> <p>EU reports</p> <p>Other donors' reports</p> <p>CSO reports</p>
<p>9. To what extent has the strategy and activities in the field of visibility, information</p>	<p>JC 9.1 The Communication and visibility plan of RoLAC</p>	<p>9.1.1 Volume of communication materials / events developed and</p>	<p>Document Review</p>	<p>Communication and visibility</p>



## Annex 5: Coding structure for the desk review

<b>Relevance</b>
Validity of initial assumptions at the inception phase and during the implementation.
Quality of indicators and mechanisms put in place to measure the benefits and impact of the programme.
<b>Efficiency</b>
Functioning of the programme management. What structures are in place (ex. PSTC)?
Description of the procedures used by BC: for procurement, finances, logistic, use of incidentals+ spending ratio (proportional to inputs / outputs)
Appraisal of monitoring system in place and of log frame updates
Appraisal of the risks assessment matrix, and follow up management. Mitigation measures put in place namely to prevent negative counter effects/ avoiding do not harm and preserving security
<b>Effectiveness</b>
General progress achieved on laws, strategies (based on annual reports)
Progress achieved in development and application of procedures, methods, practices
Progress achieved in services developed by justice institutions for A2J and initiatives developed / implemented to curb corruption
Progress achieved on capacities, skills and coordination of justice and AC target institutions (if any)
Mainstreaming of gender and human rights oriented measures
Other rights-based, conflict sensitive measures or environmental oriented measures integrated in programme activities and management
<b>Impact</b>
Description of early signs of impact, positive / negative changes, unintended results?
<b>Sustainability</b>
What are / are they sustainability measures foreseen in project document/FA
Check in reporting if transitional measures, transfer mechanisms or exit strategies have been foreseen for effects of the programme to be continued
<b>Added value</b>
Actors/donors active in the field of justice and AC, with which programmes + amount of funding
Quality of the com & visibility strategy

## Annex 6: Bibliography

### Contractual documents

- (a) Addendum to contract (not signed)
- (b) Contract signed with JoyAdonai travels and tours Ltd (visibility\_
- (c) Financing agreement
- (d) General conditions
- (e) Organogram – programme structure management
- (f) PADODA agreement with the British Council
- (g) Project document

### Programme documents

- (h) Annual narrative and financial reports - year 1 to 4 and annexes
- (i) YR1 Baseline Expert Assessment Reports
- (j) YR2 Expert Assessment Reports
- (k) YR3 Expert Assessment Reports
- (l) YR4 Expert assessment reports for C1 to 4 and Impact level
- (m) Terms of Reference for PSTC and SPSTGs
- (n) RoLAC Indicator Handbook v6 200920
- (o) RoLAC M&E Strategy v6 reviewed August 21
- (p) RoLAC updated Logframe v41(Dec21) version 5 for EU Review Team 280122
- (q) Nigeria Briefing note for RoLAC Final Evaluation version 220131
- (r) Factsheet April 2021 – Overview of all Nigeria justice programmes
- (s) Factsheet Rule of Law and Anti-Corruption in Nigeria
- (t) PSTC meetings minutes
- (u) Communication and visibility strategy
- (v) PDSS report to RoLAC

### RoLAC formulation documents:

- (w) Revised Annex 1 - EUDF RoLAC DoA Amendment 2019
- (x) Project Identification Report

### 10<sup>th</sup> EDF formulation documents

- (y) Formulation of the Anti-corruption support project in Nigeria- final report April 2011
- (z) Formulation of the justice support project in Nigeria - final report July 2010

### Evaluation reports:

- (a) Mid-Term Evaluation report of EU support to justice sector in Nigeria - 2015
- (b) Mid-Term Evaluation report of the EU support to Anti-Corruption in Nigeria– 2015
- (c) Mid-term evaluation report of the RoLAC Programme , 2020

### Templates for Action document (NDICI)

- (aa) Action document with instructions
- (bb) Mainstreaming assessment
- (cc) Assessment / rationale for the proposed implementing partner



## EU Documents and guidance

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- (gg) Human Rights and Democracy Country Strategy
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## Acts & strategies and other legal documents

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- 15 Economic and Financial Crimes Commission : Strategic Plan 2021 – 2025
- 16 Force Order No 20 as amended (Police Duty Solicitor Scheme), 2017
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## Annex 7: Guidance for Key informants' interviews

### Justice sector

<b>Efficiency</b>
Have you experienced challenges during the programme implementation? (Delays, logistic, payment?)
Are PSTC meetings useful for your institution/ organisation? Are the national justice sector committees revived and supported by RoLAC at the federal and state level functional? Which key institutions are participating?
Which model instruments and mechanisms proposed and implemented by RoLAC have contributed to the efficiency of your institution / organisation?
What are the internal cooperation systems put in place by RoLAC to consult and monitor your action plan/grant?
<b>Effectiveness</b>
How has the programme contributed to the implementation and / or review of the ACJA, other relevant criminal justice bills or Access to Justice laws during programme implementation?
Which systems, procedures, have been adopted and implemented by your institution with the support of RoLAC? Which benefits were observed? (E.g. How are SARC established / functioning, how is the legal aid system has been improved, how have restorative justice models been adapted)
What kind of IMS or CMS been developed and deployed? Are they well-functioning and used by staff?
Which cooperation and coordination mechanisms have been put in place in the criminal justice system and access to Justice system? How are these committees functioning? (support of RoLAC)At federal and state level? Between Federal state and States?
What were the delivered outputs / activities implemented under RoLAC? Were you satisfied by the quality of the support of the training / capacity building delivered?
How has access to justice been improved for women, children, persons with disabilities and other vulnerable groups? To which extent RoLAC contributed to the assistance and protection of these vulnerable groups with your institution/ organisation.
How were gender sensitive and human rights measures mainstreamed and incorporated in justice service delivery? How effective these measures are?
Are structures, systems and procedures established in the field of SGBV comply with international standards? Are risk assessment and conflict sensitive measures taken to avoid any adverse effects of the assistance and protection measures?
How or how far has your organisation (CSO) been engaged in the criminal justice sector reform agenda (federal/state level) thanks to RoLAC? Are you consulted by government institutions in relation to your work and has RoLAC improved your advocacy / dialogue with relevant administrations?
How is your institution (government agency) engaging CSO, public or other actors in the development and implementation of the justice reform agenda?
How has your institution's organisation raised awareness/ promoted access to justice and rule of law under RoLAC (federal/state level)? What kind of communication/ outreach activities were implemented?
<b>Impact</b>
Do you think the intended objectives planned for your organisation/ institution and of the programme been achieved? What are the main changes observed in terms of transfer of know-how, organisational/ institutional improvement, benefits, ownership? Any examples of ownership?
How has RoLAC contributed to the improvement of the criminal justice system and the service delivery of criminal justice institutions?
How has the programme contributed to the improvement of Access to Justice in Nigeria?
What are the changes observed at the level of the communities/effects and impact on vulnerable groups?
How your organisation (CSO) have been involved in the development and implementation of criminal justice bills and other draft laws or legal amendments, justice policies and strategies?
<b>Sustainability</b>
What plans/modalities are in place to ensure sustainability of RoLAC beyond the EU or other donor assistance? Were contingency and transitional plans designed with your institution / organisation?
To which extent capacity and know how have been developed? Any new skills or methods that you have learned from the programme and that you have applied in your work practices? Are these methods integrated into the organizational structure of your institution/organisation? Can you briefly explain?
<b>Added Value</b>
What is the value of this EU support? What does this add to the assistance you received by the other international donors and development partners?
How your institution or organisation has raised awareness/ promoted access to justice and rule of law with or without the support of RoLAC (federal/state level)? What kind of communication/ outreach activities were implemented?

## Anti-corruption sector

<b>Efficiency</b>
Have you experienced any kind of challenges during the implementation of programme activities with RoLAC? Please describe (logistic, delays in implementation or payments, other problems)
What mechanisms did RoLAC support you with to ensure planning, coordination and reporting process with your institution/ organisation? Were these mechanisms helpful?
How have risks on AC activities/initiatives been assessed, and monitored? Any mitigation measures that were taken to avoid occurrence of these risks under RoLAC or under your own institution/organisation?
<b>Effectiveness</b>
Can you please provide a brief overview of the delivered outputs / activities that RoLAC supported your institution/ organization with? How was the quality of capacity building or support provided?
Please describe how your agency cooperates with other ACA and with the Justice sector? Which protocols are in place?
Which regulations were implemented for the implementation of AC laws and AC strategy? Have there been new laws drafted or enacted in the sector? Any specific policies with regards to integrity in criminal justice, public procurement, extractive sector...?
How has RoLAC contributed to the advancement of the fight against corruption (at federal level / in your state)? What systems and procedures have been adopted/implemented to enhance cooperation among target ACAs (with or without the support of RoLAC)?
Can you please describe key AC achievements in terms of reforms, policies and strategies attained under RoLAC? How have these been implemented? How many AC cases were detected, investigated, prosecuted and adjudicated thus far/ per year? Please provide a brief explanation as to how this has worked in the key target areas (criminal justice, public procurement and extractive sector).
Can you please describe how gender sensitive measures, rights-based approach and conflict sensitive measures were incorporated into the programme activities implemented with your institution/ organization (at output level and / or within the management)? What are examples of success (or not) of this gender-human rights mainstreaming elements?
For CSO/journalists/public or private sector: how did you benefits from awareness or training received on Anti-corruption? Have you been able to improve advocacy on AC? Have you participated in some policy-decision making processes with government agencies or influence any AC policy?
<b>Impact</b>
Have all intended objectives been achieved? What are the main changes observed following the support of RoLAC in terms of staff skills, service delivery, organisational/ institutional improvement, benefits for the communities? Have you been to cascade down the training received? How? Please provide examples of positive or negative effects observed.
Changes and early impact obtained at CSO and citizens level? What is your perception / satisfaction of AC initiatives developed by the programme? Any unintended positive or negative results? Other lessons learned?
<b>Sustainability</b>
What plans/modalities have been put in place to ensure sustainability of the project activities beyond the end of the programme? Do you still need to sustain some benefits of the programme? Which ones?
How much capacity has been developed within your institution/organisation? Any new skills or methods that you have learned from the programme and that you have applied in your work practices? Are these methods integrated into the organizational structure of your agency? Can you briefly explain?
What contingency or transitional plans were established to secure the transfer of know how beyond the project closure? How are your plans to manage the transition from EU support to FGN implementation? Is this programme considered as Nigeria's business or EU/international donor business?
<b>Added Value</b>
What is the value of this EU funded support? What does this add to the assistance you received by the other international donors / development partners?
What are the communication tools or materials developed during RoLAC to raise awareness / promote the fight against corruption? Which visibility events have been implemented to promote fight against corruption?

## Annex 8: Guidance for Focus Group Discussions

EU's Support to Nigeria's Rule of Law and Anti-Corruption Programme (2017-2020) under the 11<sup>th</sup> EDF has the objective of enhancing good governance by contributing to strengthening the rule of law and curbing corruption.

The fourth component of RoLAC aims at the enhancement of citizens' civic and public engagement in criminal justice sector reforms and the fight against corruption.

**Introduction: Greetings! My Name is Mr/Ms. \_\_\_\_\_ and my colleague is \_\_\_\_\_.** We are independent consultants working for EU on Final Evaluation of Support to the Rule of Law and Anti-Corruption in Nigeria (RoLAC) and Formulation of the next Phase of RoLAC.

**These views will be included in a report but the names and views of participants in the FGD will remain anonymous and confidential. I would like to ask your consent to be part of the assessment, which may take about an hour.**

**Your personal contributions and views will not be shared with anyone else in a way that can identify you. Are you willing to participate in today's discussion? [Confirm.] Thank you very much. Let's begin. Can we first go round and quickly introduce ourselves to each other?**

**After introductions, we will move onto the discussion.**

- What have been the major achievements accomplished under RoLAC, with your institution/organisation, in the improvement of the criminal justice sector reforms, access to justice or the fight corruption?
  - Civil Society Support / Network Committee in implementing legal provisions and justice service delivery, legal aid services, assistance to victims of SGBV, women, children and PWD
  - Civil Society Engagement In the Criminal Justice Reform Agenda and Access To Justice,
  - Citizen, Civil Society And Media Engagement In The Fight Against Corruption,
  - Capacity Of Civil Society And Media To Successfully Track; Investigate And Report Corruption,
- What were the major gaps/ challenges encountered during implementation of the various activities targeting civil society and media and how were the challenges overcome?
- How would you describe the significance and adequacy of the programme support towards achieving the overall objective of enhancing good governance in Nigeria by contributing to strengthening the rule of law and curbing corruption?
- Which priorities should the second phase of RoLAC focus upon to deepen and build on the gains or address the gaps under the first phase of RoLAC?
- What are the major factors, internal to the CSO/network/committee sector or external, impacting the success of the programme interventions? What measures do you recommend to mitigate the adverse impacts or scale up the positive impacts to the programme (namely to ensure human rights/gender based violations and corruption risk are avoided)?
- What are your current priorities towards enhancing civic and public engagement in criminal justice reforms, access to justice and anti-corruption? How do you think they should be better addressed?
- How do you describe your current technical, financial, organizational and human resources capacity towards achieving the enhancement of citizens and public engagement in criminal



justice reform and fighting anti-corruption? What measures/interventions do you suggest in enhancing your capacity to attain these goals? (Including mainstreaming of gender sensitive, conflict sensitive and rights-based measures / initiatives).

- How do you envision the contribution of your organisations/ networks in the next five years in enhancing access to justice, citizens and public engagement in advancing criminal justice reform and curbing anti-corruption? How best could this vision be attained? What strategies, outcomes and activities do you recommend?

**(Thank the participants and wind up the discussion)**

**Annex 9: Field schedules and list of persons met and interviewed**  
**FIELD SCHEDULES**

**Abuja: from 14 to 18 February**

		8.00am to 9.00am	9.30am to 11.00am	11.30am to 1.00pm	2.00pm to 3.30pm	4.00pm to 5.30pm
<b>Monday February 14</b>			European Union	MBNP / NAO	RoLAC/British Council	
<b>Tuesday February 15</b>	Justice Team		The Albino Foundation (9:30 – 10:00am)	Magistrates	FMoJ/FJSRCC (2pm to 3.15pm)	FCT High Court/ACJMC
	Anti-corruption Team		PACAC	Vacant-anti corruption	FMoJ/NACS (2pm to 3.15pm)	FCT High Court/ACJMC
<b>Wednesday February 16</b>	Justice Team	LACVAW/WRAPA (WRAPA Office)	National Agency for the Prohibition of Trafficking Against Persons (NAPTIP)	NPF FCID HQ	NPF FCT Command Garki II	Legal Aid Council of Nigeria (LACoN)
	Anti-corruption Team		ICPC -	EFCC		TURGAR -
<b>Thursday February 17</b>	Justice Team		Nigerian Correctional service	Federal Ministry of Women Affairs,	National Commission for PWDs	3 NBA branches
	Anti-corruption Team		CCB		BPP	NFIU
<b>Friday February 18</b>	Justice Team		SARC Bwari	SDS/SGBV RT	SOAR(FGD with beneficiaries)	DRAC with beneficiaries
	Anti-corruption Team		SCUML	PLSI (FGD with beneficiaries)	NEITI	PTCIJ (FGD with beneficiaries)

### Abuja: from 28 February to 17 March

- 1 March:** 9.00 am: EU MCN project; 2pm: ICIR  
**2 March:** 5.00 pm: EU ACT project  
**4 March:** 9.00 am: Action Aid  
**7 March:** 12.00 to 1.30 pm: British Council Procurement HR and finance; 3 pm: ICRC  
**8 March:** 10.00 am: National Human Rights Commission; 3 pm: GIZ  
**9 March:** 9.00 am UNICEF  
**10 March:** 9.00 am: OSIWA; 11.30 am: Spotlight; 2pm: UNODC  
**11 March:** 9.30 to 12.30 pm: triangulation meeting with British Council, 2pm: CLEEN Foundation; 3 pm: NIDTA  
**14 March:** 9. 30 to 12.30 am Feedback sessions with Justice Sector institutions, 1 pm: Code of conduct tribunal, 3.30 pm: Special Court  
**15 March:** 9. 30 to 12.30 am Feedback sessions with AC institutions, 1 pm: CISLAC  
**16 March:** 11.00 am: IPAS, 12.30 pm: UNDP  
**17 March:** 11.30 am National Judicial Institute, 1pm: FCT Judicial Service Commission; 4pm: Mac Arthur Foundation  
**18 March:** 1pm: Partners West Africa Nigeria

### Lagos: from 21 to 25 February 2022

DATE	TIME	Justice Team	Anti-corruption Team
Mon, 21 Feb 2022	12:30pm - 2:00pm	Lagos State Office for Disability Affairs (LASODA)	BUDGIT Foundation (CSO Grantee)
Mon, 21 Feb 2022	3.00pm- 4.30pm	Child Protection Network (CPN)  <i>Meeting to include</i> <ul style="list-style-type: none"> <li>• CPN</li> <li>• local govt officials that they engaged with</li> </ul>	Lagos State Public Procurement Agency
Tues, 22 Feb 2022	9.00am- 11.30am	Meeting with some CSO grantees + LACoN  <i>Meeting to include:</i> <ul style="list-style-type: none"> <li>• REPLACE (CSO Grantee),</li> <li>• Access to Justice (CSO grantee)</li> <li>• Legal Aid Council</li> </ul>	
Tues, 22 Feb 2022	12.00 noon- 1.00 pm	Ministry of Youths and Social Development – <i>Alausa Secretariat, Ikeja</i>	
Tues, 22 Feb	2.00pm- 3.30 pm	Partnership for Justice	Centre for Social Justice - CSO Grantee

DATE	TIME	Justice Team	Anti-corruption Team
2022		<i>To have FGD with Partnership for Justice (CSO Grantees and beneficiaries)</i>	
Wed, 23 Feb 2022	11.00a.m-12.30pm	Ministry of Justice  To meet: <ul style="list-style-type: none"> <li>• Commissioner of Justice</li> <li>• Permanent Secretary</li> <li>• OPD</li> <li>• Community Service Unit</li> <li>• DPP</li> <li>• CMC</li> </ul>	
Wed, 23 Feb 2022	1.30p.m-2.30pm	Nigeria Police Gender Desk – <i>Police Command Headquarters</i>	
Wed, 23 Feb 2022	3.30pm-5.30pm	Lagos State Judiciary- <i>High Court of Justice Ikeja</i>  <i>The Hon Justice Kazeem Alogba</i> <i>Hon Justice RIB Adebisi</i> <i>Hon Justice Oyefeso</i> <i>Chief Magistrate Fadeyi</i>	
Thurs, 24 Feb 2022	9.00am-11.00am	1. Site visit (only) to IDERA SARC at Alimosho General Hospital, Igando  2. Then proceed to Women Rights and Health Project (WRAPH – CSO grantee) office, at for a meeting with IDERA SARC Centre Manager and WRAPH Director with some beneficiaries.	
Thurs,24 Feb 2022	12.30pm-2.00pm	State Criminal Investigation Department (SCID), Pantl, Yaba. <ul style="list-style-type: none"> <li>• Deputy Commissioner of Police Pantl, DCP Adegoke</li> <li>• Statement Taking Room (STR officers) –</li> </ul>	
Thurs,24 Feb 2022	3.00pm-5.30pm	Lagos Multi door Court House, <i>High Court of Justice Ikeja</i>	
Fri, 25 Feb	9.00 am-	Domestic and Sexual Violence Response Agency,	

DATE	TIME	Justice Team	Anti-corruption Team
2022	10.30a.m	Ministry of Justice, Alausa Secretariat, Ikeja	
Fri, 25 Feb 2022	11.00am-12.30pm	Centre for Citizens with Disabilities To have an FGD with the following: <ul style="list-style-type: none"> <li>Centre for Citizens with Disabilities (CSO Grantee)</li> <li>Disability Cluster groups</li> </ul>	

### Adamawa: from 23 to 25 February 2022

		9.30-11.00am	11.30am- 1.00pm	2.00pm- 3.30pm	4.00pm-5.30pm
Wednesday 23 February	Justice Team	Ministry of Justice- Office of the Permanent Secretary/Solicitor General.	Justice Sector reform team- Office of the Solicitor General/Chairman JSTR	Nigerian Bar Association/ CSO/Media working on ACJL- NBA Secretariat opposite Correctional Service Headquarters.	Legal Aid Council (LACON) Police Duty solicitor scheme (PDSS) lawyers
	Anti-Corruption team	Bureau of Public Procurement- State Secretariat complex.  Contact person Zare Baba- 08039415043		Anti -Corruption transparency Unit.  Ministry of Justice conference room.  Contact person- Abubakar Saad- 08038530324	
Thursday 24 February	Justice Team	Judiciary-meeting with: Chief Judge, Magistrate and Administration of Criminal Justice Committee.	Nigerian Police force- Criminal investigation intelligence department (CIID)	-Meeting with High-level multi-Agency Team (HiMAT and Service providers Accountability Resource committee (SPARC).	

		Office of the Chief Registrar High Court Complex		Sexual Assault Referral center- Specialist Hospital Yola.	
	Anti-Corruption	Office of the Head of Service- Venue-Office of the Head of Service.	ADSAC CSO- Office of Head of service.		
Friday 25 February	Justice Team	Ministry of Women Affairs and Social development- State secretariat complex-	FGD with Child Protection Network (CPN), Federation of International Women Lawyers (FIDA), Joint National Association of Persons with Disabilities (JONAPWD) and WRAPA		

**Kano: from 28 February to 3 March 2022**

		9.30-11.00am	11.30am- 1.00pm	2.00pm- 3.30pm	4.00pm-5.30pm
<b>Monday 28<sup>th</sup> February 2022</b>	Justice Team			Judiciary High Court <ul style="list-style-type: none"> <li>• Chief Judge</li> <li>• Chief Registrar</li> <li>• Director of Training</li> </ul>	Nigerian Police (NPF), Nigerian Bar Association (NBA)  <input type="checkbox"/> Vice Chair NBA <input type="checkbox"/> Police rep of O/C Legal



		9.30-11.00am	11.30am- 1.00pm	2.00pm- 3.30pm	4.00pm-5.30pm
	Anti-Corruption team			CSO working on Open Government Partnership (OGP), Media Representatives: <ul style="list-style-type: none"> <li>• Co-Chair CSO on OGP</li> <li>• Chair, Nigerian Union of Journalists</li> <li>• Journalist (Online)</li> </ul>	
<b>Tuesday 1<sup>st</sup> March 2022</b>	Justice Team	Ministry of Justice to meet with: <ul style="list-style-type: none"> <li>• Attorney General</li> <li>• Permanent Secretary</li> <li>• Director of Public Prosecution</li> </ul>	Justice Sector reform team <ul style="list-style-type: none"> <li>– Secretary</li> <li>– Assistant Secretary</li> <li>– Member</li> </ul>		
	Anti-Corruption team		Public Complaint and Anti-Corruption Commission (PCACC) <ol style="list-style-type: none"> <li>1. Chairman</li> <li>2. Dir. Anti-Corruption</li> <li>3. Isa M. Bello M&amp;E Contact</li> </ol>	Public Procurement Bureau <ul style="list-style-type: none"> <li>• Permanent Secretary</li> <li>• Director Planning Research &amp; Statistics</li> </ul> Venue: Public Procurement Bureau,	

		9.30-11.00am	11.30am- 1.00pm	2.00pm- 3.30pm	4.00pm-5.30pm
			4. Aisha U. Gambo Head KANSAC Secretariat Venue: PCACC, State Road	State Road	
<b>Wednesday 2<sup>nd</sup> March 2022</b>	Justice Team	Kano Civil Society Forum (KCSF)  • Chairman & Secretary		Sexual Assault Referral centre (SARC);  Sexual Offender Database: HiMAT & SPARC  • SARC Manager • SGBV Response Team Chair • HiMAT Chair • SPARC Chair • NAPTIP IT Person	
	Anti-Corruption		Office of the Head of Service  • Director. Human Resource • Under Secretary		
<b>Thursday 3<sup>rd</sup> March 2022</b>	Justice Team	Ministry of Women Affairs  • Dir. Planning, Research & Statistics	CSO: WRAPA/FIDA/ IWEI/JONAPWD		LACON/Free Legal Service Providers Forum (FLSP)  • LACON State Coordinator • Secretary FLSP Forum

		9.30-11.00am	11.30am- 1.00pm	2.00pm- 3.30pm	4.00pm-5.30pm
		Venue: Ministry of Women Affairs, Off Bank Road, Kano	<ul style="list-style-type: none"> <li>a) WRAPA (CSO Grantee) State Lead</li> <li>b) FIDA (Former Chairperson)</li> <li>c) SCIAN Chair</li> <li>d) Isa Wali Empowerment initiative (iWEI) – CSO grantee</li> </ul>		

#### Anambra: from 1 to 4 March 2022

		9.30-11.00am	11.30am- 1.00pm	2.00pm- 3.30pm	4.00pm-5.30pm
<b>Tuesday March 1</b>	Justice Team		Commissioner of Police & Team	Attorney General –DPP; Solicitor General & Permanent Secretary	Chairman, Disability Rights Commission
	Anti-corruption Team		Attorney General; Head of Service; Anambra State Anti-Corruption Strategy (ANSACS) M&E Committee; Head Open Govt Partnership and Secretary ANSACS	Chairman, Bureau of Public Procurement Head due process	
<b>Wednesday March 2</b>	Justice Team	Deputy Chief Registrar (DCR) Inspectorate	Chief Judge – DCR Inspectorate	Anambra State Justice Sector Reform Team (ASJSRT) Chairman and Team member	
	Anti-Corruption Team	CSO on ANSACS operations & FOI			
<b>Thursday March 3</b>	Justice Team		Ministry of Women and Children Affairs	Nigeria Bar Association + Legal Aid committee; beneficiaries of legal	

				assistance FGD on legal assistance and advocacies on implementation of the provisions of the ACJL, NBA, Coordinator, Legal Aid Committee	
<b>Friday March 4</b>	Justice Team	SARC staff/Secretary SARC Steering Committee	Joint National Association of Persons with Disabilities (JONAPWD) (clusters)	VAPPL, CPN, ASCRIC, meeting with Social Protection Officers and beneficiaries on response to SGBV	

**EDO: from 8 to 10 March 2022**

		9.30-11.00am	11.30am- 1.00pm	2.00pm- 3.30pm	4.00pm-5.30pm
<b>Tuesday March 8</b>	Justice Team	Attorney General Director of Public Prosecution Citizens' Rights SGBV Prosecution Team		Chief Judge & Chair Administration of Criminal Justice Committee ( ACJMC) Secretary Administration of Criminal Justice Committee (ACJMC) Head of Criminal Court and Chairperson of the Justice Reform Team Deputy chief registrar – ICT) (Deputy Chief Registrar – Litigation )	Nigerian Police Force Officer in Charge of Legal
<b>Tuesday March 8</b>	Anti-corruption Team		Edo State Public Procurement Agency		
<b>Wednesday March 9</b>	Justice Team	Disability Clusters – Joint Association of Persons with Disability (JoNAPWD)	Service Providers Accountability Resource Committee (SPARC)	Nigerian Bar Association Edo State Coordinator of the PDSS Coordinator and Secretary of the Legal Aid Coordination Team (LACT)	
<b>Wednesday March 9</b>	Anti-corruption		The Africa Network for Environment and Economic Justice (ANEEJ) and		

	Team		Nigeria Union of Journalist (NUJ) + Beneficiaries		
<b>Thursday March 10</b>	Justice Team	Ministry of Gender and Social Development			

## LIST OF PERSONS MET AND INTERVIEWED

### JUSTICE SECTOR

#### ABUJA

##### **ALBINISM FOUNDATION AFRICA**

- Jake Epelle, CEO/Founder

##### **BWARI GENERAL HOSPITAL, ABUJA – SARC**

- DR. Abdullahi Anate, Chief Medical Director

##### **DRAC**

- Constance Omyemarchi, Executive Director
- Eze Chidiebere, Force Medical PR Liaison Officer
- Akinbola Olancke, NCPND
- Joris Agbohaje, Senior Program Officer
- Odeyinde Mojsola, Senior Program Officer

##### **LEGAL AID COUNCIL**

- Aliyu B. Abubakar, Director General
- Bamidele O. Ibikunle, Director, International and Corporate Operations
- I. I. Ibrahim, Deputy Director
- Oguche Victor O., Head of Statistics
- Janefrances Ojoma Bianeyin, Clad – International operations
- Jessica Mamven, Press
- Jonah Oplex Agyj, Administrative officer
- Akumabi Ojogbane, Press Department

##### **FEDERAL JUSTICE SECTOR REFORM COORDINATING COMMITTEE (FJSRCC)**

- Felix Ota-Okojie, Secretary

##### **FEDERAL MINISTRY OF WOMEN AFFAIRS**

- Emmanuel Alhassa, SCDO
- Adegoke Michael, SCDO
- Balogun Ashreas, PSWD
- Nnaugha Helen Ogos, CDOI
- Adeyelure Adeyemo Adebayo, CSWO (PPnP), Fed Ministry of Women Affairs
- Adediram Adekunke Oeyani, PM (SOZO)
- Archibong Anderson, Ex. Secretary, National Council of Child Rights Advocate
- Soadatu Shettina, DDR, National Human Rights Commission
- Ms Manam F, AD Fed Ministry of Foreign Affairs

##### **NATIONAL COMMISSION FOR PERSONS WITH DISABILITIES**

- James David Lalu, Executive Secretary

##### **NATIONAL CORRECTIONAL SERVICE**

- DCG Shy Nwalanche, representing the CG, Operations
- DCG Adaobi Oputa, Inmate Training and Productivity
- ACG Sowemimo, Training and Staff Development
- Dr Adio, Controller Planning Research and Statistics
- Deputy Controller O Kosum, Legal Unit
- ASC Edomwanyi Omorochon, ICT Unit
- Dr. Lyn Agomoh, Executive Director, Prisoners Rehabilitation and Welfare Action (PRAWA)
- Honest Offu, Senior Programme Officer, PRAWA



### **NATIONAL JUDICIAL COUNCIL**

- Hadiza S. Saied, Director Performance Evaluation and Legal
- Bintur-Shik Florence, Director Admin (Secretariat)
- Zarah Babangida, Child Kegal Officer, SA to Secretary
- Ulmar M. Bangari, Esq., AG Director, Genetal duties, SSA to the Secretary

### **NATIONAL POLICE FORCE – CRIMINAL INVESTIGATION DEPARTMENT**

- SP Lydia A Ozoemena, Special Enquiry Bureau FCID
- CSP Okzchukwu Elegha, Interpol Section FCID
- CSP Esangbedo Emmanuel, Force Intelligence Bueau (FIB)
- DSP Regina Amos-Giwa, Admin section, FCID
- CSP Grace Wata, Special Fraud Unit
- DCP Clement Robert, Homicides
- A Austin Iwar, ROLAC Consultant
- ACP Alex O. Ebbah, FCID

### **NIGERIA BAR ASSOCIATION**

- Adjey Mondewi, NBA Bwari Branch
- Chioma Onyenucheya-Uko, Vice Chair, NBA Abuja Branch
- Ebenezer Amadi, Program coordinator YLF – NBA Abuja Bracnh
- Adehirah Deborah, NBA Abuja Bracnh
- Bulus Atsen, NBA Abuja Branch (Chairman)

### **SOAR AND PROJECT BENEFICIARIES (Focus Group Discussion)**

- Aisha Z. Yussuf, HDS Social Welfare Gender
- Chimyere Eyoh, SOAR
- Usman D Abubakar, Mentor Klukara
- Ibrahim Ali, CCPC, Secretary
- Levi Yakubu, SOAR
- Amazu Chimencheng, Officer, Case Manager, Survivor Support

### **NATIONAL JUDICIAL INSTITUTE**

### **NATIONAL HUMAN RIGHTS COMMISSION**

- Hilary Ogbona, Senior Human Rights Officer

### **LAGOS**

### **CENTRE FOR CITIZENS WITH DISABILITIES**

- David Anyaele, Executive Director
- Njoku Kingsley, Deaf
- Ihuoma Sussan, Physical
- Lalaheed Oguntade, Physical
- Peter Elamimi, Physical
- Atteh Florence
- Atmia Damilare, Physical

### **FGD CSO**

- Felicitas Aigbogun-Brai, Executive Director, Rights Enforcement Public Law Centre (REPLACE)
- Lateef Akiuborode, Executive Director Community Women's Rights Foundation (CWRF)
- Paul Olaleran, Voluntee People With Disability
- Osinugi Oladipupo, Egalitarian Chambers
- Chinelo Chinweze, Programme Officer, Access to Justice
- Bayo Akulade, Founder, Duty Solicitors Network
- Iyabo Akungbode, Legal Aid Council

- Bulowotan Manren, FIDA
- Iyabo Akingbade, LACON

#### **LAGOS MULTI-DOOR COURTHOUSE**

- Adeyinka Aroyewun, Director

#### **LAGOS STATE OFFICE FOR DISABILITY AFFAIRS (LASODA)**

- Ogundairo Oluwadamilare J., General Manager

#### **CHILD PROTECTION NETWORK**

- 1) Aderonke Oyelakin- State Coordinator
- 2) Lateef Akinborode - Deputy State Coordinator
- 3) Evans Enwefah - Ojo LGA Coordinator/Asst. Secretary
- 4) Rasaki Oseni - LNSC. Beneficiary- Ikorodu CPN
- 5) Juliet Olumuyiwa-Rufai- Member CPN Ikeja
- 6) Alh. Sonibare Lukman - Chairman - Ikorodu Local Government Child's Right Implementation Committee (LGSCRIC)

#### **HIGH COURT**

- Hon Justice R.I.B. Adetayi, Judge
- Hon Justice J.E. Oyefeso, Judge
- Falah Sholabitaie, Staff
- Fadeyi M.K.D Deputy Chief Registrar, Legal, Ikeja

#### **IRETI RESOURCE CENTER**

- Bose Irousi
- Tunrayo Falade, Legal Officer, WRAHP/IRETI
- Martinos Marcelina, Medical Social Welfare Officer
- Abimbola Abolarin, CDC Member
- Olufemi Ojo, CDC Secretary
- Rabi Kazeem, CDC
- Elizabeth Babatunde, ICCD Social
- Priscilla Adibola, MPF
- Babatunde-Martins Moromoke, Idera Sarc CM
- Bose Housi, ED
- Precious Ebare, WRAHP
- Diya Sharon, WRAHP
- Tunrayo Falade, Legal Officer
- Precious Eberechulanu, Community Representative

#### **LAGOS STATE DOMESTIC AND SEXUAL VIOLENCE AGENCY**

- Lililola Vivour Adeniyi, Executive Secretary

#### **LAGOS STATE MINISTRY OF JUSTICE**

- Titilayo Shutta-Bey, Permanent Secretary
- Ajayi Yetunde, Office of the Public Defender
- Shakira Karimu-Kotun, Director, Community Service Unit
- Abiola Oseni, Director, Citizen' Mediation Center
- Rotimi Odutola, CMC
- Adetutu Oshinusu, Citizens' Rights
- Dr Babajide Martins, Director of Public Prosecutions
- Bola Alansete, MOJ Secretary Criminal Justice Sector Reform Committee

#### **LAGOS MINISTRY OF YOUTH AND SOCIAL DEVELOPMENT**

- Dr Aiwa O. A., Permanent Secretary
- Oguulola, Legal Department
- Akinnenui B. O., Social Welfare Department

- Obilana A.O., Child Development
- Olalekan S. O., Social Welfare Office
- Oke S. K., Legal Unit
- Oklotto P.O., Child Development
- Aladelusi M. O., Child Development

#### **PARTNERSHIP FOR JUSTICE**

- Nkiruka Perpetus Opara, Procurement Officer
- Jennifer Isi Mogeke, Finance Officer
- Alexis Adelu, Programme Officer

#### **POLICE GENDER UNIT**

- Grace Agbuola (CSP), O/C Gender L/State Command
- Abimbola Williams, Deputy, Gender L/State
- Olaluncle Orebe, Admin Officer Gender Desk

#### **SARC**

- Martinos Marcelina, Medical Social Officer
- Babatunde-Martins Moromoke, Idera Sarc CM
- Abimbola Abolarin, CDC Member
- Olufemi Ojo, CDC Secretary
- Rabi Kazeem, CDC
- Elizabeth Babatunde, ICCD Social
- Bose Housi, ED
- Tunrayo Falade, Legal Officer
- Precious Eberechulanu, Community Representative

#### **STATE CRIMINAL INVESTIGATION DEPARTMENT (SCID)**

- Deputy Commissioner of Police Panti, DCP Adegoke
- Yusuf Ibrahim, Statement Taking Room (STR officers)

#### **KANO**

##### **KANO CIVIL SOCIETY FORUM**

- Ibrahim Waiya, President
- Peter Hassan Tijani, Secretary

##### **KANO MINISTRY OF JUSTICE**

- Salisu A. Marmara, Director
- Muhd. M. Suleiman, DCR
- Mustapha N. Muhammad, DPRS
- Amina Yusuf Yargaya, SG/PS
- Khalifa Auroac Hashim
- Habiba Abdulmumini Yelowa, DDCR
- Zakuja Aharuna, State NHRC
- Shebu Addullahi, Coordinator
- Aliyu Mohammed, Legal officer
- Katumi Mohd Oboirien, LACON Secretary of the Network

##### **KANO MINISTRY OF WOMEN AFFAIRS**

- Zabain Abdulmia Zubair, SSNO-AG: DDPRS
- Yakubu Muhd, DPRS
- Hauwa Musa Suleiman, Deputy Director Child Department

##### **SARC AND NAPTIP**

- Salma Ahmad D, Child Protection Network
- Abba Bello Ahmed, Sexual Assault, Referee, SARC

- Aliyu Abubeke, NAPTIP
- Muhammed Barde, NAPTIP

## **ADAMAWA**

### **Judiciary**

- Hon Justice Fatima Tafida, Judge of the High Court
- Hon Justice Kyanson Samuel Lawanson, Judge of the High Court
- Christopher Mapeo, Chief Registrar
- Abbas Adamu Hobon, Deputy Chief Registrar
- Magistrate Dimas Elshama Gwama

### **Nigeria Police Force, Criminal Investigation Department (CID)**

- Deputy Commissioner, Vugnoh Kwalmo
- Inspector Stephen Yohanna (Statement Taking Room officer)

### **Focus Group Discussion**

- Helen Ibrahim, Secretary General, Association of Sign Language Interpreters Adamawa State Chapter
- Lubna Dodo, Treasurer, International Federation of Women Lawyers (FIDA), Adamawa
- Hiradi Banil, Member, Child Protection Network
- Salamatu Abdullahi, Executive Director, Adamawa People Living With Disability and Vulnerable Support Initiative
- Yahaya Ahmad Iya, Secretary, Child Protection Network, Adamawa State
- Sani Sabo, State Chairman, JONAPWD

### **Justice Sector Reform Team, Ministry of Justice (MOJ)**

- Samuel Yaumande, Solicitor General/Permanent Secretary
- Ishaq Abdullahi Jada, Acting Director of Public Prosecutions
- Abdulrahman Iliyasu, Senior State Counsel II
- Zaiyanu Usman Yusuf, Senior State Counsel II
- Samuel Gamaniel, Nigeria Security and Civil Defence (NSCDC) Representative, Justice Sector Reform Team
- Ishaku David Kulthu, State Counsel II

### **Hi-Level Multi-Agency team (HiMAT) and Service Providers Accountability Resource Committee (SPARC)**

- Zaiyamu Usman Yusuf, Senior State Counsel II
- Adamu Abubauar, Senior State Counsel II
- Lubna Dodo, Senior State Counsel II
- Fabaryu Thliza, State Counsel I

### **Ministry of Women Affairs Yola**

- Saso Benson Ali, Permanent Secretary
- Edward Yadzugwa, Director, Rehabilitation

### **Nigeria Bar Association (NBA)**

- Jibril Inbrahim Jimeta, Chairman
- Benjamin Ngablai, Member NBA/CSO
- Fadimatu Aliyu, Member NBA/CSO

### **Legal Aid Council**

- Francis Adam Ogbe, State Coordinator
- Muhammed Abubakar, Counsel

### **SARC (Hope center)**

- Dr Usha Saxena, Director

- Aliyu Dahiru, M & E Officer
- Christiana Silas, Counsellor
- Ralias Simon, Admin officer

#### **ROLAC Adamawa State Coordinator**

- Hapsatu Abdullahi

#### **ANAMBRA**

##### **Nigeria Police Force, Criminal Investigation Department (CID)**

- Muhammed Yakubu, Deputy Commissioner of Police, CID
- Umaru Ozigi, Deputy Commissioner of Police, Admin
- Anayo Nwano, Officer in Charge (OC) Legal
- Ikenga Tochukwu, Assistant Superintendent of Police, Police Public Relations Officer

##### **Office of the Attorney General of Police**

- Dr Obianuju Nwogu, Honorable Attorney General and Commissioner of Justice
- Okwy Igwegbe, Head of Service, Anambra State
- Nkiru Nwankwo, Director of Public Prosecution (DPP)
- Lilian Oguchi, Secretary, Anambra State Anti-Corruption Strategy (ANSACS) Secretary
- Obiora Obiabunmo, Senior Special Assistant to the Governor on Economic Planning and Budget
- Arthur Iwuanya, Chairman M & E, ANSACS Committee
- Ogochukwu Orji, OGP Focal Person

##### **Inspectorate Division**

- Vivian Udedike, Deputy Chief Registrar (DCR)

##### **Anambra Justice Sector Reform Team (JSRT)**

- Justice Peter Obiorah, High Court Judge and Chairman JSRT
- Juliet Amasiatu, Anambra Broadcasting Station (ABS)
- Nkiru Nwankwo, Director of Public Prosecution (DPP), Ministry of Justice
- Roseline Okeke, Assistant Director, Ministry of Justice
- Mike Anyadiegwu, Magistrate
- Ifiora Chukwudozie, Principal State Counsel, MOJ
- Okoye Amaka, Public Relations Officer, State Ministry of Health
- Maduabuchi Amaka, State Coordinator, Legal Aid Council
- Attajadumi Simon, Anambra State Bureau of Public Prosecution

##### **Disability Rights Commission**

- Chuks Ezewuzie, Chairman Disability Rights Commission

##### **Nigeria Bar Association (NBA) and Legal Aid Committee**

- Ezekwe Chinaechem, NBA, Welfare Secretary
- Nkolika Ebede, Legal Aid Committee Coordinator
- Ifiora Chukwudozie, Legal Aid Committee Secretary
- Ken Nwanna, NBA Chairman
- Chineze Obiayo, NBA member
- Aniebiet Edet Davies, NBA, Member
- Raluchukwu Nonso Jane, NBA Member
- Damaris Nnajofofor, NBA Member
- Ezeobidi Oluchukwu, Beneficiary

##### **Child Protection Network (CPN), VAPPL and Anambra State Child Rights Implementation Committee (ASCRIIC)**

- Ifeyinwa Unachukwu, Anambra Broadcasting Station (ABS)
- Yohanna Rachel, member CPN
- Ekwemeze Francis, Legal Officer Intracom Africa

- Ifiora Chukwudozie, Principal State Counsel, MOJ
- Okoye Hope, Executive Director, Intracom Africa
- Onyedilefu Lovet Uju, Chairperson, CPN
- Emeka Ejirole, ASCRIC
- Gabriel Alonta, Editor, Orient Daily
- Chukwuanu Ogochukwu, Beneficiary
- Obun Chidimma, Beneficiary

#### **SARC Ntasi Center**

- Dr Uchendu Bernedette, Director

#### **JONAPWD Anambra Chapter**

- Ugochukwu Okeke, Chairman
- Ncheta Nwanokpara, Finance Officer
- Ogbonna Umeh Bonaventure, Programme Officer
- Collins Joseph, Sign Language Interpreter
- Amobichukwu Nwagwu, Chair Nigeria National Association of the Deaf
- Vivian Ezeonwumeru, Chairman, Anambra State Albinism Association
- Igwebe Ifeanyi, PRO JONAPWD

#### **ROLAC Anambra State**

- Josephine Onah, Coordinator
- Chigozie Chukwurah, State Admin and Resource officer

#### **EDO**

#### **Judiciary and Administration of Criminal Justice Monitoring Committee (ACJMC)**

- Justice J. I. Acha, Chief Judge and Chairman ACJMC
- Justice Efe Ikponwonba, Head of Criminal Division and Justice Reform Team
- Franca Ogbofor, Deputy Chief Registrar (ICT)
- Bright Oniha, Deputy Chief Registrar (Litigation)
- D.N. Iyalekhue, Assistant Director, Criminal Division
- Felicia Edokpolor, Secretary, ACJMC
- Iryn Omarogiwa, Secretary, Justice Reform Team

#### **Nigeria Police Force, Criminal Investigation Department (CID)**

- Peter Ugwumba, Chief Superintendent of Police, Officer in Charge (O/C) of Legal

#### **Ministry of Justice**

- Stella Okojie, Director of Public Prosecution (DPP)
- Orobosa Okunbor, Head of Prosecution
- Ikpefan Joan, Head of Legal Advice

#### **Ministry of Gender and Women Affairs**

- Marie Edeko, Honorable Commissioner
- Barbara Osobajo, Permanent Secretary
- Joy Ihensekhien, Director Gender Issues
- Kate Bello, Director Child's department
- Stephanie Orobator, Technical Assistant to Permanent Secretary

#### **Nigeria Bar Association (NBA)**

- Pius Oiwoh, NBA Chairman
- Amen Osagie, NBA member
- Osakwe Osamudiamem, Member
- Osayuki King Agbonghae, Member
- Theresa Sunday, NBA member
- Ofor Patrick, NBA, Member



- Francis John Okhiku, NBA Member
- Ephraim Onije, NBA Member
- Haruna Aje, NBA member
- Humphrey Osarenmwinda, NBA, Member
- Emmanuel Okorie, NBA Member
- Okwuegbu Egenti, NBA Member
- Faith Igbineweka, NBA Member
- Henry Nwaozor, NBA Member

#### **Service Providers Accountability Resource Committee (SPARC)**

- Priscillia Usiobaifo, Executive Director, BraveHeart and Chair of SPARC
- Theresa Omionawele, Secretary
- Joy Orawemen, GirlPower Initiative

#### **JONAPWD Edo Chapter**

- Ann Ojugo, Chairperson
- Lucky Imafidon, Member
- Janet Omole, Women Coordinator

#### **ROLAC Edo State**

- Uchenna Nwokedi, Coordinator

#### **Anti-corruption sector**

<b>Name</b>	<b>Institution</b>	<b>Position</b>
Mr Aliyu Aliyu	Federal Bureau of Public Procurement (BPP)	Director
Mansur Mamman	Federal Bureau of Public Procurement (BPP)	Open Contracting Technical Lead
Prof. Bolaji Owasanoye	ICPC	Chairman
Mr Abbia Udofia	ICPC	Director/Commissioner and HOD CMED
Akeem Lawal, FSI	ICPC	Director Operations
B.O.Mohammed	ICPC	Director Admin
Czayi B.B.	ICPC	D. PRS
Abbia Udofia	ICPC	D(SSR)
A.I. Raheou	ICPC	AG. Director
Ob Kingsleyi	ICPC	Assistant Director External Cooperation
Okoye Jude	ICPC	Ass. Dir. Plan PERF. MGT
Toyin Ayeni	ICPC	DIR. FINANCE & ACCOUNTS

Name	Institution	Position
Faison Maik	ICPC	CHIEF SUPR. ACAN
Olayinka A. Aiyegbayo	ICPC	ADCMED
Aliyu Wali	EFCC	Head External Cooperation
Michael Kayang	EFCC	Project Officer External Cooperation
Zephaniah Bulus	CCB	Director reforms coordination and service improvement
Sebastian Gwimi	CCB	Director Intelligence, Investigation & Monitoring
Aliya Edogi Aliya	BPP	Directorate(rd)
Mokuozu Adesina	BPP	Ass.CPO
Mansur Mamman	BPP	
Olusola Olowolade	BPP	Prog. Analyst
Lilian Ekeanyanwu	Technical Unit on Governance and Anti-Corruption Reforms (TUGAR)	Head
Jane Onwumere	TUGAR	Assistant Director
Oguntuberu Bosede	TUGAR	Assistant Team Head
Dr Orji O. Orji	Nigeria Extractive Industries Transparency Initiative (NEITI)	Executive Secretary
Obiageli Onuorah	NEITI	Deputy Director/ Head, Communications & Advocacy
Dr. Donald Tyoachim	NEITI	
Sadiya Ceashinbaki	NEITI	
Chris Ochonu	NEITI	
Ladidi Mohammed	Federal MOJ, Asset Recovery and Management Unit	Director
Bunmi Naiyeju	Federal MOJ, Asset Recovery and Management Unit	Senior Counsel ARMU & NACS Secretariat

Name	Institution	Position
Mohammed Ahmed	Nigeria Financial Intelligence Unit (NFIU)	Chief of Staff to the CEO
Fatima Bukar	NFIU	Director, International cooperation
Douglas Egwuemi	NFIU	
Mohammed Ahmed	NFIU	
Ijeoma Ani Igboji	NFIU	
C. Ogbaji	NFIU	
Daniel O. Okafor	NFIU	DIRECTOR RC & SI
Abu I . S	NFIU	Deputy Director
Alliu K. Adewuyi	NFIU	ASST. DIR
Ekenne Okezie Okafor	NFIU	ACSB
Bulus Z.I	NFIU	DIRECTOR EAS
Daniel Isei	SCUML	Director
Ibinabo Amachree	SCUML	Head data management and information
Enu Mathew	SCUML	
Mr Abdulamlik Shuaibu	Code of Conduct Tribunal	
Justice Ijeoma Ojukwu Mr Ambrose Unaeze	Federal High Courts (special courts)	Judge SA Legal and Constitutional Matters
Tosin Alagbe	Premium Times Centre for Investigative Journalism [PTCIJ]	Program Officer
Olusegun Elemo	Paradigm Leadership Support Initiative	Executive Director
Zainab Haruna	Step up for Social Development and empowerment in Nigeria	Programme director
Dayo Aiyetan	International Center for Investigative Reporting	Executive director

Name	Institution	Position
Gloria Agema Adeolu Kilanko,		Deputy Program Manager Program Manager
Onafowote Fatai Idowu	Lagos State Public Procurement Agency	Director General
Henry I. Idogun	Lagos State Public Procurement Agency	Managing Director/ CEO
Awoyemi Omobolaji - o	Lagos State Public Procurement Agency	Procurement Office
Kayode Rachael	Lagos State Public Procurement Agency	Tech Asst To DG
Kelechi Obinaku	Lagos State Public Procurement Agency	Legal Advisor
Subair Akintunde	Lagos State Public Procurement Agency	Head M&E Dept
Yusuf Adekunle Q	Lagos State Public Procurement Agency	Senior Procurement Officer
Ifeoluwa Ayeni	Lagos State Public Procurement Agency	Procurement Officer
Femi-Funja Francisca	Lagos State Public Procurement Agency	Procurement Officer
Alli A. Oluremi	Lagos State Public Procurement Agency	Chief Procurement Officer
Kemi Oyekan	Lagos State Public Procurement Agency	Legal department
Agboola I. Johnson	Lagos State Public Procurement Agency	Head Internal Proccurement
Adeladan O. Adewuyi	Lagos State Public Procurement Agency	Head ICT
Eze Onyepkere	Centre for Social Justice	Executive Director
Fidelis Onyejebu	Centre for Social Justice	Project officer
Abba Bello	Adamawa State Bureau for Public Procurement	Director-General
Musa Khalid	Adamawa State Bureau for Public Procurement	Secretary and Legal adviser

Name	Institution	Position
Zare Baba	Adamawa State Bureau for Public Procurement	Head Communications and Media
Musa. A. Gadzame	Adamawa State Procurement Agency	HOP,FIN, BD
Abubakar Bello	Adamawa State Procurement Agency	MOE & HCD
Hussaini Musa	Adamawa State Procurement Agency	Head ICT (BPP)
Haruna Ayuba Kwaha	Adamawa State Procurement Agency	Procurement Officer
Ishaya Theophilus	Adamawa State Procurement Agency	Procurement Officer
Jackson B. Senela	Adamawa State Procurement Agency	D F
Nuhu Hayatu	Adamawa State Procurement Agency	Procurement Officer
Iliya Yakubu	Adamawa State Procurement Agency	SPO
Ezekiel O. Obazele	Adamawa State Procurement Agency	Head, E-Procurement Dept
Haura Etsemhe	Adamawa State Procurement Agency	Head Registration Unit
Dr Edgar A. Sunday	Adamawa State Office of Head of Service	Adamawa State Head of Civil Service
Saadahu Saldu	OHOS	DIR. ADMIN
Patumbwa E. Valiq	OHOS	Internal Auditor
Maria Z. Niuge	OHCS	ACCT 2
Philemon J. Kayeni	OHCS	CAO/SEC.ADSACS UNIT
Panasung Yakubu	OHCS	Admin Officer II
Sadiq Abubakar	OHCS	Head Of Communications &Logistics ADSACS
Aggrey B. Ali	OHCS	Permanent Secretary
Barr Mrs Okwy Igwegbe	Head of Civil Service of Anambra State on	Head of Civil Service; ANSACS Secretariat

Name	Institution	Position
	Anambra State Anti-Corruption Strategy (ANSACS)	
Melie Onyejepu	Anambra State Bureau of Public Procurement	Chairman
Simon Attajudumi	Anambra State Bureau of Public Procurement	Head, Due Process
Henry Idogun	Edo State Public Procurement Agency	Managing Director/CEO
Anthony Okungbowa	Edo State Head of Service	Head, Edo State Civil Service
Priscilla Aziegbemhin	Edo State Head of Service	Permanent Secretary
Salisu Tahir	Kano Public Complaints and Anti-Corruption Commission	Advisor to the Chairman of PCACC
Zainabi Sani	KPCACC	Director
Aisha Usman Gombe	KPCACC	Head of HR Department
Kamalu Shehu Garba	KPCACC	investigator
Akilu Abdullahi Adam	KPCACC	
Abba A. Danguguwa	Head of Civil Service, Kano,	Director, Human Resources
Muhammed Nasir Ilu	Head of Civil Service, Kano	Undersecretary
Ibrahim Bello	RoLAC, Kano Office	Coordinator
Misbahu Ahmed Bedcawi	Public Procurement Bureau, Kano	Focal officer, Rolac
Murtala Al-hadji Gerba	Public Procurement Bureau, Kano	Director, Local Govt
Abbas Ibrahim	Journalists Union, Kano	CEO
Isyaku Ahmed	Global Platform, Stallion Times, media,	Civil Society Advisor, journalist
Kashifu Inuwa Abdullahi	NITDA - Ministry of communication and	Director General'CEO Chief IT officer of Nigeria



Name	Institution	Position
	digital Economy	
Iklima Musa Salihu	NITDA - Ministry of communication and digital Economy	Special assistant (strategy and Innovation) to the DG/CEO
Gary Kelechi Amadi	PACAC	
Ona Peters	PACAC	
Aghogho Agbahor	PACAC	
Olusegun Elemo	Paradigm Leadership Support Initiative (PLSI)	Executive Director
Mosunmela Akinsanyana	PLSI	Finance Officer
Abdulahi Adebayo	PLSI	Project Officer
Zainab Hauna	Step Up NAGENA	Programme Director

### **British Council**

Danladi Plan	National Programme Manager
Sanjiv Malhotre	Operations Manager
Oluwatoyin Badyogbin	ROLAC
Emmanuel Uche	C3 Manager
Samson Nduleme Onwusanye	P.O. 1
Hannatu Essien	P.O. 4
Uchenna Nwokeh	P.O. 2
Oluwatoyosi Giwa	C2/C4 MANAGER
Dala Pwanakei	P. O.3

#### State coordinators:

- Lagos – Ms Ajibola Ijimakinwa
- Adamawa – Ms Hapsat Abdullahi
- Kano – Mr Ibrahim Bello
- Anambra – Ms Josephine Onah
- Edo – Ms Uchenna Nwokedi

### **NAO:**

Eze Johnson

Head planning

Iwebafa Gifl Odibo	Assr director
Aliyu Wali	AG Head
David Orisanaiye	ICT department
Aayaah Michael	Section Head

### **Donors and development partners**

Laolu Olawumi  
Clément Boutillier  
**EU Delegation**

Ukoha Ukiho  
**Managing Conflict in Nigeria**

Damilare Babalola  
**Agents for Citizens' Transformation (ACT) Program**

Pietro Rosario Tilli  
Coordinator, Relations with Armed and security forces  
Ghaza Ghandour  
Deputy protection Coordinator Detention  
**ICRC**

Kate Okoh  
Gertjan de Gruitjer, head of project  
**GIZ (Police Program Africa)**

Hazida Mary Usman  
**Partners West Africa Nigeria**  
**Rule of Law and Empowerment Initiative**

Hadiza Dorayi  
**UN Spotlight Coordinator**

Onyinye Ndubuisi  
**UNDP**

Tosin Akibu  
**UN Women**

Amandine Bollinger  
Child Protection Specialist  
**UNICEF**

Oliver Stolpe  
**UNODC**

Tommy Ubong  
Adedunstan Adewale  
**Action Aid**

Tem Fuh MBUH  
**OSIWA**

Kole Shettima  
**Mac Arthur Foundation**

Lucky Palmer  
Country Director  
Doris Ikpeze  
**IPAS**

## Annex 10: Table of limitations, risks, mitigation actions, ethical and confidentiality considerations

Table 1: Risks and challenges related to the assignment and mitigating measures undertaken by the team of experts during the field phase

Risks/Challenges	Mitigation actions
Security risks for experts' field missions	<p>The DAI security team has been available 24/7 to ensure the security of the experts, mostly while they travelled to the focal states outside of Abuja. A security briefing was provided during the first week of the mission. A list of assessed hotels, transport companies and other important was provided to the experts. The experts were interacted with the security adviser through a WhatsApp group, briefing him regularly on departure/arrivals at airports, movements within the states, and following security instructions in regards of the vehicle used. The evaluation team, composed of a local and a regional expert, were willing to conduct data collection in states that were not deemed safe enough for European and international experts and therefore conducted field visits in the FCT and four of the five focal states. Beyond FCT, the formulation team conducted field visits in two focal states. The TL travelled to Lagos and attended meetings in Abuja</p>
Time limitations to collect primary and secondary data	<p>The experts' team was supported by the British Council to organize and plan the schedule of interviews with the relevant stakeholders. Due to traffic conditions and working hours, the experts' teams could conduct a maximum of 4 meetings per day. Strategic documents, legal documents, annual reports, statistic records and concept notes discussed during the interviews were collected at the end of each meeting or forwarded by stakeholders after the meetings. Although the Experts' team was experienced enough to deal with the potential information volumes, the evaluation team had more interviews to conduct (one week more of field missions) and it took longer for them to reconcile their interviews notes, the feedback and notes shared by their colleagues and to cross check information with the ongoing formulation study. Moreover, the conduct of both evaluation and formulation phases at the same time was not convenient and realistic. An identification process during the evaluation would have been more feasible and effective, namely in order to withdraw the lessons learned of the evaluation before formulating a complete and detailed Action Document. The current phasing has therefore put additional burden on the team and led to some gaps in harmonising and synchronising the deliverables. It was indeed premature to deliver the formulation study while analysis and synthesis of the evaluation process was not terminated. Moreover, the quality control carried out by the HQ over the deliverables had not been factored in the initial planning as only informed the first day of the field mission. The comments sent by Brussels led to further work that was going beyond the requests made in the ToR and entail in depth corrections that were not supported by any guidance in the ToR.</p>
Potential biased analysis of the action' results	<p>The team was provided with few performance and annual reports from the partner institutions. The information provided by RoLAC annual reports are counterbalanced and critically assessed by the experts' assessment reports conducted every year. Beneficiary institutions were not usually keen on providing data and statistics, as they had already referred them to RoLAC, and a few concepts were addressed to the Team. As information retrieved through interviews is likely to be subjective depending on the perceptions and opinions of officials or key agencies' representatives, the evaluators organised two triangulation sessions with the IP to ensure a balanced picture of the results achieved. The primary data collected on the field was shared and discussed among all team members on a weekly basis to fill in eventual gaps on the interests and challenges that may have been</p>

Risks/Challenges	Mitigation actions
	important to focus on during the following interviews. Data collected will some institutions was also systematically cross-checked with other institutions working in the sector, being part of the same network and also with external factors supporting the same institutions.
Acceptance of findings and of future programme priorities and interventions	Most partners institutions requested the Experts' Team to be consulted in the design process of the follow up programme and some stakeholders complained they had not been sufficiently consulted during the formulation of the current action. Although not foreseen in the ToR, the EUD consented to organise with the support of the IP, two feedback sessions of three hours during which the formulation team presented the outline of the follow-up programme (intervention Logic): one with justice sector institutions, the other one with the AC institutions. The presentation included the strengths and opportunities observed as well as the pending gaps and challenges that needed to be tackled (including those that occurred during the management of the programme). During the discussion following the presentation, partner institutions also provided their feedbacks on drawbacks and learnings of the current programme and additional substantial inputs to be taken account during phase 2. The ToR also foresee a dissemination seminar to deliver the findings of the evaluation and the orientations of the new action to all programme stakeholders. The team has also undertaken a participatory approach with the Reference Group (EUD, British Council and new implementer) at key points along the mission when challenges were encountered, or explanations were required on specific issues.
Do Not Harm and conflict sensitiveness	The team of experts has taken into account the diversity of general and public interests and values related to the assessment, namely in regards of the different cultures and customs existing in the focal states to visit. Our work was conducted in accordance with Do Not Harm principles by implementing a conflict-sensitive approach to the evaluation and formulation process, ensuring that our interventions minimise risks to, and burdens on, those participating in the process. The team focused on reducing any unnecessary harms that might occur without compromising the integrity of the assignment For instance, the team has paid attention to the health, safety or security risk of persons or groups interviewed, namely while conducting focus group discussions on sensitive issues (e.g. SGBV issues), while interviewing vulnerable end beneficiaries or CSO at risk of exposure.
Human rights / gender sensitivity and rights-based approach	The team of experts has respected the dignity and self-worth of respondents, project participants, and other evaluation stakeholders and behaved in a non-discriminatory manner. Evaluators integrated concerns and respect for human rights, child rights, women's and men's rights, throughout the evaluation process, provided that cross-cutting issues were also clearly mainstreamed within components of the programme. The team ensured cultural sensitivities were understood and respected, namely when discussing of human rights violations and SGBV issues. However, the experts' team has never found difficulties to address questions on sensitive areas of enquiry, even in states considered more conservative. Experts avoided to exacerbate existing tensions among institutions or between the IP and critical institutions.
COVID-19 outbreaks in relevant areas	All experts were fully vaccinated and complied with the prevention measures put in place by the Nigerian authorities to respond to the spread of the virus, following the directives and restrictions adopted by Nigeria at the time of the field mission (e.g.: PCR test, social distancing, wearing mask, and respecting hygiene related measures).

**Table 2: Ethical considerations and confidentiality issues related to the assignment and comments on how the team of experts tackled these issues on the field**

Ethical and confidentiality principles	Comments
<p><b>Integrity and honesty</b></p>	<p>The experts were fully transparent with all stakeholders in relation to the purpose of the assignment and use of the data provided. During the interviews and consultations, the experts informed participants of the formulation and evaluation purposes, process and intended use / dissemination of their analyses, findings, conclusions, recommendations and lessons learned / best practices.</p>
<p><b>Confidentiality of data</b></p>	<p>The team secured the consent of participants and complied with confidentiality principles prior to all data collection activities and ensured that the Key informants and focus group discussions were undertaken in a manner that pays due respect to cultural practices and beliefs. Privacy, anonymity of participants and the confidentiality of information was also ensured in the reporting process. Information is being displayed in a way that does not compromise sources. In line with EU Regulation 2018/1725 related to the protection and management of personal data, the data collected for this assignment was securely protected, and identities exposed in the list annexed to the report have been done with the written permission of informants (who filled in an attendance list during the meeting). In addition, and as part of the Contractor's obligations, data protection is being ensured for all confidential information, including personal data of participants and confidential data which is made available to the evaluation team for the purpose of the present evaluation. Therefore, all telephone numbers or email addresses have been withdrawn from the list in annex. All the experts engaged in this assignment have been required to sign a Declaration of Confidentiality in accordance with EU procurement procedures. These requirements are further reinforced in the experts' contractual terms of engagement and have been applied all along the assignment, in particular following the request of the EUD not to unveil the name of the next implementing partner.</p>
<p><b>Impartiality and transparency</b></p>	<p>The Consortium ensured that experts' team adhered to ethical standards and exercised the highest degree of professionalism, impartiality and objectivity. The team acted with independence, expressing their views, freely and without any external pressure. The objectives of the evaluation as mentioned in the ToR were carefully analysed and taken into account in all the assignment's activities. The evaluation team also paid attention to the quality of their judgements, based on well-substantiated and robust evidence, or when not available on the most accessible relevant data. In case of any divergence or contradictory judgement between the experts and one or more of the stakeholders, the "dissenting views" or comments of the EU HQ, the EUD and the British Council made on this intermediary note have been taken into account, modified within the note and will be inserted more in details into the draft Final Evaluation Report.</p>



[Annex 11: RoLAC logical framework matrix from 2018 to 2021](#)



Annex 7 ROLAC  
Logframes.xlsx

## Annex 12 - Evidence-base matrix (for detailed responses and references)

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
<b>Introduction</b>			
Chapter 4, p. 12	Nigeria positions in the low human development category	Nigeria 161 <sup>st</sup> position out of 189 countries in the Human Development index of 2019	Human Development Report, UNDP, 2020
Chapter 4, p. 12	40% of Nigerians live below the country's poverty line	Almost 83 million people live below the country's poverty line of \$381.75 per year.	National Bureau Statistics report 2019
Chapter 4, p. 12	Nigeria ranks 121 out of 139 countries in the World Justice Project Rule of Law Index with an overall score of 0.41	Government powers, criminal justice and civil justice (respectively ranking 80, 83 and 86) and scores much lower on fundamental rights, absence of corruption and order and security (respectively ranking 113, 119 and 138)	World Justice Project Rule of Law 2021
Chapter 4, p. 12	Nigeria's ranks in governance, human rights, gender and accountability	Overall governance trend in Nigeria from 2010-2019 as in 'increasing deterioration' zone with an overall governance score of 45.5 in 2019 and a ten-year average trend result of -1.6, including warning signs in rule of law, security, participation, rights, gender, accountability, transparency and anti-corruption	Ibrahim Index of African Governance (IIAG), 2020

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
Chapter 6, p. 12	Nigeria's rank in Corruption Perception	75% of the Nigerian respondents questioned reported corruption has increased whereas only 8% reported corruption has decreased in Nigeria.	2017 Global Corruption Barometer (GCB)
Chapter 6, p. 12	Nigeria's rank and score on Gender	Ranks of 139 out of 156, scoring 0,627, with slight changes and evolution since 2006, most progress was achieved on economic participation but less on political empowerment.	Global Gender Gap Index for 2021
Chapter 2, p. 13	Policies and strategies of the GoN including the fight against corruption as a priority	Fighting corruption is identified as a prerequisite to achieve the National Vision.	First National Implementation Plan for Nigeria (Vision 2020)
Chapter 3, p. 13	International and regional commitments of Nigeria in the fight against corruption	Nigeria is a state party to the United Nations Convention against Corruption (UNCAC), the African Union Convention on Preventing and Combating Corruption (African Union (AU) Convention) and the Economic Community of West African States Protocol on the fight against Corruption (ECOWAS Protocol).	See ratifications and adhesion processes

**EQ1. To what extent was the organisational and management set up of the programme conducive to an efficient programme delivery?**

**JC.1. 1**

**Staff allocation was sufficient to implement the action efficiently**

Chapter 3, p.17	Large scope of work encompassed by the RoLAC programme	For instance, for the 3rd year: 631 activities were planned across the four components of the programme, and as of July 2020, 370 activities had been completed or were ongoing and 259 activities had not been carried out. Therefore, the mid-term evaluation recommended more staffing to be able to	Minutes of the 8 <sup>th</sup> Federal PSTC meeting (5 November 2020)  Mid-term evaluation of the RoLAC programme – Final report – November
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Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
		handle the workload.	2020, revised February 2021
Chapter 4, p.17	Additional reference related to the number of activities in workplan for year 5	Although the number of activities forecast for year 4 is not indicated in the minutes of the PSTC or in the annual report, 583 activities are listed in the workplans for year 5, across all components and states. This is without counting sub-activities identified under Component 1 mostly: e.g., 75 sub-activities were counted under C1 at federal level).	Workplans for the 4 components of year 5, Annexes 11 A, B, C and D of the annual report for year 4
Chapter 4, p.17	The Evaluation team notes that the institutional support and capacity delivered to the beneficiary institutions were mostly provided on individual basis, which was time consuming and resource intensive	This is without counting sub-activities identified under Component 1 mostly: e.g., 75 sub-activities were counted under C1 at federal level). Most beneficiary partners considered that the programme management staff, mostly at the PIU level, was overstretched by this large number of activities to implement.	Workplans for the 4 components of year 5, Annexes 11 A, B, C and D of the annual report for year 4
<b>JC 1.2</b> <b>The managerial capacities and technical skills of the KE and NKE were appropriate to implement this programme</b>			
Chapter 2, p. 18	Forecast budget analysis for international experts	Given the enduring COVID situation, there is not much difference between year 3 and year 4 if we compare the forecast and the real costs incurred for international experts. In these last two years, the average of 65% of the budget line on international experts was absorbed compared to 87% in year 2	
Chapter 2, p.18	Analysis of budget line for international experts	Given the enduring COVID situation, there is not much difference between year 3 and year 4 if we compare the forecast and the real	

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
		<p>costs incurred for international experts. In these last two years, the average of 65% of the budget line on international experts was absorbed compared to 87% in year 2.</p>	
<p><b>EQ 2: To which extent has the project achieved the expected outputs and outcomes?</b></p>			
<p><b>JC.2. 1</b> <b>Progress achieved in passage of laws and adoption/ implementation of policies / strategies</b></p>			
Chapter 1, p. 21	Status of the ACJA in Anambra	<p>In Anambra, the Administration of Criminal Justice Law (ACJL) review has been completed and it is being finalized. However, it may not require additional support from RoLAC, except for gazetting and printing when assented.</p>	<p>- Final Evaluation report, page 27 RoLAC had supported a retreat of representatives of the Anambra Justice Sector Reform Team and the Judiciary Committee of the state legislature to apprise them of proposed amendments to the bill. See RoLAC Year 4 Annual Progress Report, page 15.</p>
Chapter 6, p. 21	Testimony on the role of RoLAC in the passage of the NCSA	<p>RoLAC was instrumental in the finalisation of the new Nigerian Correctional Service Act (NCSA) enacted in 2019. During the interview with the Expert's Team, the representatives of the Nigerian Correctional Services (NCS) emphasise that they had been trying for 27 years to pass this new law and the British Council (through RoLAC) has been the only organisation that enabled them to drive this initiative and support them financially for its implementation. The NCSA ensures compliance with the ACJA and international human rights standards, promotes non-custodial penalties, restorative justice, and rehabilitation of ex-prisoners.</p>	<p>- Interview with NCSA</p>

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
Chapter 8, p. 21	<p>Passage and implementation of the Violence Against Persons (Prohibition) Act (VAPP), the Child Rights Act (CRA) and other laws that facilitate access to justice for women, children and PWD</p>	<p>At the federal level, ROLAC supported the implementation of the VAPP Act. All the focal states have passed a form of the VAPP. Edo recently passed an amendment to their VAPP law while Kano incorporated provisions of the VAPP law into their Penal Code Bill. Lagos State has the Domestic Violence Law, which is a VAPP equivalent, and the review to address identified gaps is ongoing. In Lagos, RoLAC supported the Ministry of Youth &amp; Social Development to review the Child Rights Law of Lagos State. In Adamawa, the Child Protection Bill has passed 2<sup>nd</sup> reading in the state legislature and in Kano, RoLAC supported the development of the Child Protection Bill in partnership with the NGO IPAS and CSO coalition. The bill is still pending before the state House of Assembly. ROLAC supported the passage of the Disability Law at the Federal level (FCT) and in Anambra, the Disability law in Edo is still pending before the state legislature.</p>	<ul style="list-style-type: none"> <li>- Passage of the VAPP Act in 2015 was supported by the EU through the Justice for All (J4A) programme</li> <li>- ROLAC Year 4 Annual Progress Report, page 15</li> <li>- Interview with Stakeholders in Edo state on 8-10 March 2022.</li> </ul>
Chapter 6, p. 22	<p>Implementation of policies &amp; strategies in the ACAs</p> <p>How to integrate NACS budget into the budget of MDAs</p>	<p>Some Members of the Committees met raised concerns about funding challenges, which has slowed the implementation of the strategy. Anambra committee for example is looking for ways to <b>integrate the cost of the implementation of the strategy into the budgets of the MDA</b> which will ensure sustainability. There were also <b>issues of sitting allowances</b> to compensate for transportation and time spent on committee</p>	<p>Interview with interlocutor, March 2022</p>



Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
	<p>Issues of payment of sitting allowances</p> <p>Very active and willing committee members eager to tackle corruption at their levels (national, sub-national)</p> <p>Integration of women at high-level very visible</p>	<p>matters – which is in addition to their regular work. As stated by one of the interlocutors, <i>“people are also asking why they should do more than what is in their contracts, for free. In Nigeria, the question is always about what is in it for me. Even though we all know that this is to help the State, we also understand that there is no free lunch anywhere”</i>. This line of thinking impacts the drive for probity and accountability. The Consultant is of the view that, unless incentive mechanisms are put in place in order to ensure commitment and effectiveness, the enthusiasm of the committed staff will be dampened.</p> <p>The Consultant noted that though the national AC Strategy committees have been successfully established with very active members including CSO networks, and women, not all of them have a secretariat where members could hold their regular meetings. They lamented that this impacts their ability to deliver on their mandate. They believe a space that serves as their official Secretariat with the necessary tools will present a more conducive environment to deliver. In some States, the members and the Head of Civil Service are actively pursuing the possibility of having the Committee directly under the Head of Civil Service Secretariat. This way, it is easier to reach out to all MDA to deepen the level of coordination among members from different agencies within the committee and have this level of coordination</p>	<p>For example - Anambra State Head of Service is a woman, Anambra, Adamawa, Edo States RoLAC Focal points are women</p>

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
		<p>trickle down to the institutions.</p> <p>In the pursuit of deepening the capacity of the NACS Committees, RoLAC facilitated the assessment of the Committees. The assessment of the NACS committees was undertaken by ANEEJ (a network of CSO) with the support of RoLAC. The exercise revealed among others the need for the establishment of an AC Commission with legal backing to monitor AC activities in the States. It was also reported that there is need for all MDA to acquaint themselves with the NACS for smooth collaboration among and between them. The evaluation team was informed that it is essential for the M&amp;E Committees to be capacitated for understanding the functioning of and for the Civil Service Commission, particularly in fiscal planning for the Budget Office. This would assist the various States in having full understanding of and proper planning of state budgets, especially concerning public procurement.</p>	<p>Interview with CSO groups in the States, March 2022; RoLAC year 4 report 2021</p> <p>Meeting with interlocutors</p>
<p><b>JC.2. 2</b></p> <p><b>Progress achieved in terms coordination among justice and / or AC institutions</b></p>			
Chapter 1, p.23	Example on collaboration between justice sector actors and sharing of information and experiences on plea bargaining in Lagos.	Lagos has pioneered the establishment of a plea-bargaining committee headed by the Attorney General to process applications and apply sentencing guidelines with more transparency and in a collective manner, so prosecutors cannot anymore individually decide on a case. Moreover, DPP publish their	Feedback from meeting held at the MoJ in Lagos on 23.2.2022, website <a href="https://lagosstatemoj.org">https://lagosstatemoj.org</a> , Tracking the RoLAC Theory of Change Component 1, February 2022

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
		<p>legal advice online (on the website of the Lagos MoJ), which allows the defendants to access information easily and avoid potential corrupt influence on the prosecutors' decisions. This process led to a 42% increase in plea bargain utilisation in two years (2019-2020) compared to the preceding two years.</p>	
Chapter 1, p.23	<p>Other example on the application of plea bargaining in other focal states and the collaboration between judicial actors</p>	<p>So far, Anambra and Edo have held their first Plea Bargain weeks. Adamawa, Anambra, Edo and Kano have also commenced setting up case filtering processes. The collaboration between the Magistrates, the National Bar Association (NBA) and the police on visits to places of detention has yielded good results. About 1,610 inmates have received legal assistance and judicial relief, which resulted in about 601 regaining their freedom and another 1000 persons receiving legal representation and assistance</p>	<p>ROLAC Year 4 Annual Progress Report, August 2021</p>
Chapter 6, p. 24	<p>For the chain to work seamlessly between justice and AC sectors, there needs to be a connection at all levels from the level of the police (public reporting of crimes and other complaints), through the chain to the adjudication at all levels from local to State to the Federal level. It is the view of the Consultant that there is a need for joint training between the Criminal Investigation Department of the police, NFIU, ICPC and EFCC for more proactive intelligence gathering on corruption cases from the</p>	<p>People should be able at the local level to report corruption to the police – which they do – However, there is not automated escalation of cases to the specialized AC agency from the police to deal with such cases. So the case dies at that level.</p> <p>Reporting corruption within the police service and other services is done using complaint boxes. This poses the question of who has the key to the box, opens the box and the</p>	

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
	<p>police (which is present in all communities), in order for a more holistic approach to fighting corruption and the laundering of proceeds of corruption into the financial sector. It is non-the-less noted that the training of Authorized Intelligence Officers on NFIU reporting resources and development of a feedback mechanisms between ACAs and law enforcement agencies (LEAs), has brought about a level of continuous conveyance of quarterly authorized officers' meetings, which seeks to improve the flow of intelligence between the NFIU and some of the relevant LEAs.</p> <p>Moreover, each justice sector institution and ACA have their own complaint units, which do not talk to each other. Those units are very rudimentary manual systems – use of suggestion boxes –, which is neither linked to, nor has the ability to be automatically escalated to the next level as a matter of urgency and/or necessity without discretion. This does not guarantee the reliability of the process of escalation within and between agencies. The fight against corruption needs to have strong inter-agency collaboration and coordination from reporting through to prosecution and adjudication of crimes.</p> <p>Nevertheless, the evaluators and British Council, agree that, due to conditions external to the programme, the capacity of the RoLAC programme to address corruption</p>	<p>discretionary powers in play regarding which complaints are escalated or not.</p>	

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
	<p>in the criminal justice sector was very limited in view of a few factors including the available funds as well as the limitation of time span under which the intervention is programmed.</p> <p>In the absence of sufficient time to do deeper and more comprehensive work on corruption in the justice sector, attention was given to short gestation interventions such as complaints policies, rights of court users and awareness of complaint processes. The time of the intervention also coincided with incidents of executive harassment of some judicial officers, with security agencies raiding the houses of judges. This made the judiciary reluctant to engage and slightly delayed the work.</p>	<p>Triangulation meeting with British Council on 11 March 2022.</p>	
<p><b>JC.2. 3</b></p> <p><b>Progress achieved under each outcome</b></p>			
<p>Chapter 1, p. 25</p>	<p>Results of ROLAC’s support to visits to places of detention by Magistrates and the NBA (through the Police Duty Solicitor Scheme – PDSS-)</p>	<p>British Council reports that 1,610 detainees received judicial reliefs, of which 601 reclaimed their freedom and that at least 1000 detainees received legal assistance via PDSS. There are also attitudinal changes around reporting requirements for criminal trials and status of places of detention. In the FCT, Magistrates now submit quarterly updates of criminal trials. More Police stations in Abuja are now providing regular monthly reports on arrests and detentions in their divisions. The</p>	<p>RoLAC ToC monitoring tool Component 1 – February 2022</p>

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
		<p>NCoS also submits periodic reports on pretrial detainees in their custody. More Magistrates in FCT, as well as in Lagos, Anambra and Edo, are also submitting reports on their reviews of remand orders in line with the ACJA and constitutional provisions and their findings from the judicial oversight visits to places of detention. There is still room for improvement in this regard though as the compliance is still partial.</p>	
Chapter 6, p. 25	Results of the restorative justice processes in Lagos	<p>The Lagos Multi-Door Courthouse has only handled 9 cases, with only 3 settled, the other cases referred were not settled or not conclusive because the defendant did not plead guilty, the complainant refused to meet the defendant, the defendant did not show or did not pay the damage. The development of restorative justice was also hindered by COVID, the strike by court staff and arson at the Lagos High Court.</p>	Meeting with the restorative justice personnel of the Lagos Multi-Door Courthouse on 24.02.2022
Chapter 3 p. 26	Data on the number of vulnerable persons reported to have access to justice through the project	<p>Available data from the Logframe on the number of women, children, PWDs and other vulnerable persons who were able to access justice through the project indicate that over 24,463 persons have until end of December 2021 benefited from, and 13,977 of them passed through the legal process.</p>	ROLAC Updated Logframe December 2021.
<b>EQ 3: _How has the project contributed to the sectors of access to justice and the fight against corruption in Nigeria?</b>			
<b>JC.3. 1</b>			



Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
<b>Progress achieved in developing procedures, systems, practices to improve Access to Justice and AC sectors</b>			
Chapter 17 p. 28	Examples of guidelines and practice directions developed in focal states	The programme supported the development of practice directions on sentencing guidelines in Abuja, Adamawa, Edo, and Kano, along with sentencing reporting templates and tools on oversight visits to places of detention (under section 34 of the ACJA). The Kano state Administration of Criminal Justice Rules 2020 was also elaborated.	See references in the report
Chapter 1, p. 29	Results of the actions supporting the implementation of the ACJA/L.	Available records provided by RoLAC, show that about 601 detainees reclaimed their freedom from police detention through admittance to bail or discharge orders. Magistrates issued at least 565 directives to have detainees arraigned in court, while at least 444 remand orders were given. In Anambra, Kano, Lagos and FCT, magistrates interacted with at least 1,839 detainees during visits to police detention facilities in the targeted states. The data collection was however interrupted by COVID-19, JUSUN and security challenges and there is no data from Adamawa and Edo states.	RoLAC ToC monitoring tool Component 1 – February 2022
Chapter 2, p. 29	Support to the NPF in the development of Standards of Practices on a range of ACJA provisions.	<ul style="list-style-type: none"> <li>• Conducting an arrest and Miranda Rights;</li> <li>• The human treatment of suspects in custody;</li> <li>• Record of arrest and inventorying of recovered property,</li> <li>• Capturing biometrics of a suspect in custody,</li> <li>• The recording of confessional statements on audio-visual devices or in the</li> </ul>	See references in the report

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
		<p>presence of the legal representative of the suspect or other person of his choice.</p> <ul style="list-style-type: none"> <li>• Bail administration while suspect is in police custody.</li> </ul>	
Chapter 3, p. 29	Results of the ROLAC support for Case Filtering process	For instance, the Case Filtering system in Lagos helped to streamline court cases and prevent the overload of Case Dockets. Transmission of case files from the Police to the DPP is faster now though not flawless. The appointment of Police liaison officer between the Ministry of Justice and Police also helped to improve the process of transmitting case files between both institutions.	ROLAC Tracking the Theory of Change Component One.
Chapter 4, p. 29	Details on the CMS results in Anambra and Kano.	Anambra has seen 2364 cases uploaded by the Judiciary and 1803 cases by the MoJ and the CMS system reduced delays by at least 265 days. In Anambra, assignment of cases has reduced from 59 to 18 days and the filing of information and proof of evidence from 108 to 15 days. In Kano, they have also uploaded over 1400 cases.	ROLAC Year 4 Annual Progress Report, pp. 25 and 26.
Chapter 1, p. 30	Number of cases recorded by the SARC supported by the programme	<ul style="list-style-type: none"> <li>• Abuja (established in 2020): 78 cases.</li> <li>• Lagos (established in March 2021): 109 cases.</li> <li>• Mirabel Center in Lagos (managed by an NGO and supported by other partners): Since its establishment in December 2013 until the field visit end of February 2022, the director reported about 7000 survivors (90% minors);</li> <li>• Anambra (established in 2019): 263 cases.</li> </ul>	<p>Number collected reported during the field visits or RoLAC information</p> <p>Nota Bene: The ROLAC Updated Logframe puts the numbers at 11,491. However, this could be more reflective of the figures from the network of SARCs across the country and not directly attributable to ROLAC.</p>

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
		<ul style="list-style-type: none"> <li>• Adamawa (established in 2018): 624 cases.</li> <li>• Kano (established in 2016): the formulation expert who conducted the field visit did not receive the information about the number of cases received by the SARC. RoLAC indicates that 3466 SGBV survivors accessed services at Waraka SARC, out of which 983 have been boys (which is the highest number of male/boy survivors recorded in all the SARCs): This center was established before the RoLAC programme, under the Justice for All programme led by the BC.</li> </ul>	
Chapter 2, p.31	<p>Structural and financial deficiencies may impact project achievement</p> <p>Additionally, as a result of the support received from RoLAC and other donor agencies as well as the FGoN, institutions such as the EFCC have understood the importance of being pro-active and getting closer to the public.</p> <p>Even though the activity presented in the second column is under the Justice Sector Component, it is essential to state that eliminating corruption within the justice sector is an outcome of this programme. For this to be achieved, it is essential for both Justice Sector and Anti-Corruption components to converge at a point in order to ensure that corruption within the Police is also practically dealt with. It was noted that the police officers are working under</p>	<p>For instance, the Consultant was informed that the 5-years (2021-2025) organisational strategy of the Economic and Financial Crimes Commission (EFCC) and its costed Action Plan were adopted with the support of RoLAC. However, the EFCC reported that it is currently in the process of rolling out the activities and is seeking assistance to have the costed plan rolled out as a matter of urgency.</p> <p>Therefore, the EFCC has established a radio programme called “Eagle-on-the-radio” which airs on Friday’s from 8:30am to 9am on Capital FM 92.9 Abuja. This initiative seems to have eased citizens’ reporting via the EFCC’s mobile app called ‘Eagle eye’ launched on 14 July 2021 which provides an interface for citizens to provide brief information and picture evidence of case(s) they would like the EFCC</p>	ROLAC Year 4 Annual Report, August 2021, p.49

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
	<p>tremendous pressure, are overstretched, with inadequate logistic support and facing many structural weaknesses. This is confirmed by all external development partner agencies, namely GIZ and UNDP that are supporting the Nigerian Police Forces (NPF) and will continue to support them in the 4 coming years, based on the coming police reform strategy.</p>	<p>to investigate<sup>75</sup>. This is a very innovative initiative, but it is not clear how many cases have been reported through this mechanism and how many of those reports have been investigated. The Radio programme is in pursuance of the public engagement objective in the EFCC Strategic Plan, which shows ownership of the strategy by the EFCC. It also shows that the EFCC has started implementing its strategic plan.</p>	
<p><b>JC.3. 2</b>  <b>Progress achieved in addressing the capacities and needs of CSO and citizens in the justice and AC sectors</b></p>			
Chapter 5, p. 32	List of CSO that have received grants by RoLAC on legal awareness	<p>Name and role of CSO</p> <ul style="list-style-type: none"> <li>- Prisoners Rehabilitation and Welfare Action (PRAWA) to improve the administration of criminal justice in Nigeria through implementation of provisions on non-custodial measures in the Administration of Criminal Justice Act (2015) and the Nigerian Correctional Service Act (2019).</li> <li>- Access to Justice to develop Anti-Torture tools and trainings as well as templates/trainings for oversight visits.</li> <li>- Women’s Rights Advancement &amp; Protection Alternative (WRAPA) to review the Kano State Penal Code and to incorporate about 30 key provisions of the VAPP Law. Their work informed the harmonisation</li> </ul>	List provided by RoLAC

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
		<p>process driven by CSO in collaboration with the Ministry of Justice to get the law passed.</p> <ul style="list-style-type: none"> <li>- Through a grant to REPLACE, several lawyers benefitted from training on the Police Duty Solicitor Scheme (PDSS) leading to 2,975 indigent persons (including 532 women, 70 children, and 93 PWDs) across Adamawa, Anambra, Lagos and Kano benefitting from PDSS services</li> </ul>	
Chapter 6, p. 32	List of CSO that have received grants by RoLAC to advocate for PWD's rights	<ul style="list-style-type: none"> <li>- The NGO Disability Rights Advocacy Centre (DRAC) was supported by RoLAC, among other actions, to develop a toolkit for disability inclusive service delivery in SGBV and documented evidence of violence against children in FCT. They also reviewed the Child Protection policy in the FCT to be more disability friendly and trained teachers in FCT on child protection issues.</li> <li>- The Center for Citizens with Disabilities in Lagos was partially funded by RoLAC and is supported by Ford Foundation and other donors.</li> </ul>	List provided by RoLAC
Chapter 1, p. 33	Activities and results of the NGO SOAR in the field of SGBV	SOAR was supported to do community rallies and sensitisation engagements, even in places of worship, and through radio programmes. They have worked well with the Area Councils in the FCT and with the SGBV Response Team. In their opinion, community engagements however remain key for prevention of cases, and prevention of SGBV is the best form of protection. ROLAC supported the establishment of community-	ROLAC Year 4 annual progress report, p.59 and power point presentation of SOAR provided to the evaluation team.

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
		<p>based child protection committees in 4 communities and the SOAR and Teen Support Center in FCT. SOAR has assisted 377 SGBV survivors. 110 community members trained as community child protection officers and 1194 children trained as mentors and peer educators in the FCT.</p>	
<p><b>EQ 4: To what extent has the project strengthened the capacities of the various beneficiary Ministries, agencies and stakeholders?</b></p>			
<p style="text-align: center;"><b>JC.4. 1</b></p> <p style="text-align: center;"><b>Level of training, capacity building and other support activities delivered to all programme stakeholders</b></p>			
<p>Chapter 2, p. 35</p>	<p>Outcomes of capacity building initiatives especially around plea bargaining and Sexual Offenders Register in the focal states</p>	<p>ROLAC, through the NGO Prisoners Rehabilitation and Welfare Action (PRAWA), provided capacity building for 2113 correctional service officers to implement non-custodial measures, and sensitisation to judges, ministries and public agencies on community corrections. So far, more than 30,000 offenders have completed community services under NCS supervision. The NCS reported having 384 instructors (trained 125 females and 259 males), who cascading down training over to 10,000 correctional officers in 2021.</p>	<p>Interviews with officials of the Nigeria Correctional Services 17 February 2022 in Abuja</p>
<p>Chapter 3, p. 35</p>	<p>Information on the number of police trained on force orders and ACJA.</p>	<p>About 120 Police officers were trained on new management force orders. About 25 mid-level police officers now put the Force Orders to use in mentoring exercises. The Police leadership has also approved mass training on the Force Orders. RoLAC also trained Police officers in Adamawa, Anambra, Edo and Lagos to step</p>	<p>ROLAC Fourth Year progress report, p. 24</p>

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
		down training on ACJL compliance.	
<b>EQ 5. To which extent were gender, human rights and conflict sensitive principles and measures reflected and mainstreamed in all phases of the project management cycle?</b>			
<b>JC.5. 2</b> <b>Extent to which cross cutting issues were mainstreamed during programme implementation by British Council and stakeholders (throughout activities, delivery of outputs and management procedures)</b>			
Chapter 4, p 40	Materials developed by the programme have embedded gender equity such as the	“Guidelines for managing women, children and persons with disabilities” into the Standing Order for the Nigerian Correctional Service, the “Lagos State Domestic and Sexual Violence unified response protocol and referral pathway”, the “toolkit on disability inclusive service delivery in sexual and gender-based violence response”, etc. (see Annex 6 Bibliography).	Material collected during field visits
<b>JC.5. 3</b> <b>Extent to which cross cutting issues were monitored and evaluated, and extent to which corrective/adaptive measures were taken to improve their integration in the programme</b>			
Chapter 3, p. 41	Scores attributed on cross cutting issues outputs under component 2	These scores have been rated as increasing for outputs 2.1, 2.2 and 2.3 during year 2 (+2), year 3 (+5) and year 4 (+7). However, the score for outputs 2.4 and 2.5 have remained at zero (0) from 2019 to 2021.	Annual experts’ assessment reports Y2 to year 4
<b>EQ 7 Which modalities have the programme put in place to ensure continuation of net benefits after the intervention ends?</b>			
<b>JC.7. 1</b> <b>Programme interventions on capacity development and skills enhancement are likely to be integrated into the organisational structure of</b>			



Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
<b>beneficiary institutions and part of their working practices</b>			
Chapter 5, p. 45	Number of prosecutions and convictions recorded par SARC supported under the programme	The SARC in Bwari that started to run late 2020, recorded to have refer 4 cases to prosecution out of the 9 cases they handled in 2022. The Iteri center (run by an NGO) supported by RoLAC in Igando, Lagos, reported to have referred 24 cases to courts out of the 466 registered since they started operating in September 2020). The Domestic and Sexual Violence Response Agency (DSVRA) in Lagos reported during the interview 240 convictions for sexual violence in the past two years, out of the 10007 cases recorded between May 2019 and August 2021 (reported cases available on their website). The SARC in Adamawa reported 1 conviction out of the 624 cases received. The SARC in Anambra, zero conviction out of the 263 handled. Edo: 1 conviction out of 54 cases.	Numbers collected during field visits
<b>EQ 8 To what extent has the project supported internal EU coherence and contributed to the coordination and the complementarity of EU activities, with the programmes of other donors in Nigeria, particularly Member States?</b>			
<b>JC 8.1 The objectives and interventions of the programme are coherent with other actions funded by the EU?</b>			
Chapter 4, p.47	Details over EU ACT programme	The programme operates in 10 states (including 5 states covered by RoLAC). These CSO were previously funded by the EU, were referred by RoLAC or MCN and operate in the thematic areas targeted by the EU. These two programmes will stop to be funded in 2023	Interview MCN and EU ACT programme managers

Chapter and page	General Findings	Relevant Examples	Evidence – Reference documents
<p><b>JC.8. 2</b></p> <p><b>RoLAC is complementary to other projects implemented or assistance provided by other external development partners (EU MS and other donors/partners)</b></p>			
<p>Chapter 2, p. 48</p>	<p>Synergies that took between RoLAC and different international and national partners to complement some activities in relation to the four programme components, which were initially planned by other agencies</p>	<p>This has been the case with GIZ and ICRC, which are supporting and training the police on investigation, prosecution, compliance with human rights standards. Those agencies developed SOoPs and force orders in cooperation with RoLAC based on their primary objectives or specialised expertise in the fields, which have built on RoLAC pre-existing or pre-developed activities with the NPF.</p> <p>Other national NGO have collaborated with RoLAC in the field of access to justice, legal awareness and accessibility of vulnerable groups (women, PWD), enforcement of laws and support of protection networks, in the focal states. As well as over thematic commonly covered by agencies like IPAS (partners for reproductive justice) in Kano, Action Aid (to set up Local Government Child Rights Implementation Committees in FCT and on an AC campaign in common focal states) and other CSO supporting the rights of PWD</p>	<p>Interviews with Stakeholders</p>

## Annex 13: Profiles of the evaluators

### Profiles of the experts

#### **E1/TL: Organisational Development Specialist; Evaluation and Formulation TL: *Ms. Sylvie Nicole***

Sylvie Nicole has actively participated in more than six projects as a Team Leader and has a strong academic background in International Criminal Justice and Rule of Law, which she has put into practice in the development cooperation context supporting human rights, gender, security, democratic governance, and civil society empowerment in fragile, transitional and post-conflict countries, particularly in Africa. Sylvie has extensively worked in developing countries on strategic planning, EU funding instruments and aid modalities, governance and anti-corruption. Sylvie has solid expertise in the identification and formulation as well as the implementation of the monitoring and evaluation methodology, including the application of Results Oriented Monitoring (ROM) and OECD/DAC evaluation criteria, in the context of various donor aid processes and procedures.

Sylvie has a track record of collaborating closely with civil society organizations in more than ten projects, as evidenced by her various assignments assessing the social and economic situations. Moreover, Sylvie has a long history of working directly in projects in Niger, Burkina Faso, Central African Republic, Guinea Bissau, Mali, and other similar areas.

#### **E2: Anti-corruption Expert (CAT I): *Ms Stella Attakpah,***

For more than 14 years, Ms. Stella Attakpah has led programming to trace, detect and suppress illicit financial flows and the economies, which fuel them. Critical for successful delivery of the assignment, Stella has extensive experience working across the anti-corruption space in West Africa and its member States including Nigeria. She brings long-standing relationships and trust with Nigeria's FIU, EFCC, ICPC, the Police Service and NPO/civil society organizations in relation to anti-money laundering and the financing of Terrorism. Moreover, Stella understands the challenges and opportunities of bi-lateral and regional cooperation on illicit financial flows and the policy and structures, which must be in place for such cooperation to succeed. For example, serving as the Head of the Law Enforcement Division in GIABA (2006 -2009 and 2013- 2015) Stella led technical assistance to ECOWAS member states FIUs, AML/CFT inter-ministerial committees, the private sector and civil society organizations in West Africa including Nigeria. Working with key relevant institutions in Nigeria recently Dec 2020-Oct 2021, Stella assessed their capacity to better capture and monitor information on the risks of corruption, money laundering and terrorist financing, as well as cross-border laundering of proceeds of other illicit activities. She lectures at the Opportunity and Risk Management Institute, training participants on managing the risks of corruption and money laundering, criminalisation, radicalisation and de-radicalisation of youths in deprived communities of Accra. She recently provided technical advice to the Securities and Exchange commission of Ghana of Assessing the risks of laundering the proceeds from politically exposed persons (PEPs).

#### **E3: Justice Sector Reform Expert (CAT I): *Ms. Dominique Minnegheer***

Dominique Minnegheer is a senior expert holding a master's degree in economics, Political Sciences and International Relations and has over 20 years' experience in mostly developing countries,

primarily in Africa, West Africa, and the neighboring countries. Dominique worked on global justice delivery standards and methods, as well as justice sector reform. Furthermore, Dominique has 18+ years of highly qualified experience as a Criminal Justice Expert in the Legal system, Police and Prison Reform especially in the Nigerian Justice sector and Nigeria's administration of criminal justice act. Dominique has focused on the development, implementation, planning, monitoring and management of numerous successful large Justice Sector reform projects in the area of complex political environments including access to justice issues in developing countries.

Dominique has worked in seven missions for leading international development organizations, including the EU, and has extensive knowledge in EDF programming procedures.

#### **E4: Anti-corruption Expert (CAT II): *Mr Nadew Geneyehu***

Nadew Zerihun GEBEYEHU is an independent consultant and lawyer with experience spanning over 28 years in programs and projects in areas such as justice, anti-corruption and governance, rule of law and human rights. Nadew holds MA Degree in Interdisciplinary Studies in Human Rights (2019-2021, Germany), LL.M Degree in International, EU and Comparative Law (2003-2004, Belgium) and Bachelor of Laws (1988-1993, Ethiopia). Nadew has participated in identification, formulation, implementation and evaluation of complex programs and projects in Sub-Saharan Africa including in Nigeria, Ethiopia, Lesotho and Somalia mainly with EU. Similarly, he has worked with other international development partners such as UNDP, USAID, Sida, AFD and DFID since 2009. Nadew has worked in law enforcement and prevention of corruption in the government sector and in international development as well as in the civil society sector in project identification and formulation, capacity assessment, capacity building, policy formulation, strategic planning and evaluation projects in developing countries.'

#### **E5: Justice Sector Reform Expert (CAT II): *Mr Chinedu Nwagu***

Mr. Chinedu Yves Nwagu is a prominent justice policy reform expert in the field of human rights development and project evaluation in Nigeria and Sub-Sharan countries. He has achieved master's in law majoring with Human Rights and Democratization, Bachelor of Law and special training on Monitoring and Evaluation, facilitated by DFID's Justice for All (J4A) program. He has above 15 years of overall professional experience in human rights development specialization in monitoring and evaluation, rule of Law, justice reforms, access to justice and prison reforms, administrative structure and capacity building.

In addition, Mr. Chinedu has more than 6 years of demonstrated experience in program evaluation including evaluation methodology & framework development, data collection tools development, data collection and analysis, impact assessment, reporting to top management, conducted meetings and presentations, reviewed related documents, capacity building and institutional strengthening and training on evaluation aspects. Furthermore, he has comprehensive experience in justice & prison reform and access to justice sector together with evaluation-related technical assistance, justice policy reforms, national human rights policy, legal aid support, sexual and gender-based violence, children & disable groups, governance reformation.

He has strong professional relationship with many international and local development agency like UNODC, IRRI, DFID, Swiss Embassy and OSIWA, PRAWA, CIVIC, WACSO, EISA, CLEEN Foundation, TrustAfrica, J.T.U. Nnodum, Open Society Foundations. He has excellent communication and report writing skills on English and Igbo languages.

**Quality control: *Ms. Judit Erdos***

Judit Erdos is the designated internal QA support and Project Manager from EUROPE Ltd. She is a senior consultant focusing on public sector advisory field in the past 13 years. With master's in electrical engineering specialised in ICT, she started her career as an IT and telecommunication expert working in Geneva, Switzerland and in Budapest, Hungary for 15 years. She has carried out multiple advisory contracts for the private sector in valuation and M&A. Judit Erdos task at the Ministry of Finance was to establish the State Treasury, which gave her in-depth public finance knowledge. She has 9 years' of work experience with financial institutions in Paris, Geneva and in Budapest. Her master's in economics specialised in Finance she obtained in 1997. Since 2004, she mainly carries out evaluation, impact assessment and monitoring assignments. Judit worked in 11 countries of Europe as well as in Kenya, Liberia, and Sierra Leone.