DATA USE
IN CONTEXT
Opportunities and challenges for the use of data for accountability in Nigeria

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GLOBAL INTEGRITY
Data, Learning & Action for Open Governance

TRANSPARENCY & ACCOUNTABILITY INITIATIVE
## List of acronyms

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<tr>
<th>Acronym</th>
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<tr>
<td>ACA</td>
<td>Anti-Corruption Agencies</td>
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<td>ANEEJ</td>
<td>Africa Network for Environment and Economic Justice</td>
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<td>AICCON</td>
<td>Association of Indigenous Construction Contractors of Nigeria</td>
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<td>BPP</td>
<td>Bureau of Public Procurement</td>
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<td>CAMA</td>
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<td>Code of Conduct Bureau</td>
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<td>Centre LSD</td>
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<td>CISLAC</td>
<td>Civil Society Legislative Advocacy Centre</td>
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<td>CSO</td>
<td>Civil Society Organizations</td>
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<td>D4Acc</td>
<td>Data for Accountability Initiative</td>
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<td>FOI</td>
<td>Freedom of Information Act</td>
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<td>GI-ACE</td>
<td>Global Integrity Anti-Corruption Evidence</td>
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<td>HEDAR</td>
<td>Human and Environmental Development Agenda</td>
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<td>NEITI</td>
<td>Nigerian Extractive Industries Transparency Initiatives</td>
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<td>NEITIBO</td>
<td>NEITI Beneficial Ownership</td>
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<td>NOCOPO</td>
<td>National Open Contracting Portal</td>
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<td>OCDS</td>
<td>Open Contracting Data Standard</td>
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<td>OCP</td>
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<td>ODC</td>
<td>Open Data Charter</td>
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<td>Open Government Partnership</td>
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<td>Premium Times Centre for Investigative Journalism</td>
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<td>SFTAS</td>
<td>States Fiscal Transparency, Accountability and Sustainability</td>
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Nigeria has made progress advancing transparency, accountability, and anti-corruption agendas. This progress is reflected in the adoption of commitments through international fora and also in the launch of platforms to disclose information previously not available to the public. It is also evident in the innovative work led by a vibrant community of civil society organizations disclosing data, sharing it in ways that are relevant to citizens, and promoting the uptake of this data by experts, media, and citizens to demand accountability.

This review is part of the Transparency and Accountability Initiative’s (TAI) Data for Accountability Initiative (D4Acc) and aims to assess progress and remaining challenges around the use of data for anti-corruption in Nigeria. It builds on previous findings by TAI on using data to fight corruption in Nigeria and focuses on the political and technical dynamics hindering the use of data on public procurement and tracing illicit assets.

Global Integrity is the learning partner in this initiative. In this role Global Integrity works with TAI and partners to gather evidence and answer learning questions collectively agreed in the shared learning agenda. This review is complemented with in-depth work supporting projects funded by TAI members to improve the availability and use of data led by Human and Environmental Development Agenda (HEDA) on illicit assets and Public Private Development Centre (PPDC) on public procurement in Nigeria. The results from this in-depth work will focus on the effectiveness of the approaches used by HEDA and PPDC to improve the use of data and we will share them in mid 2021.

The review is guided by three questions identified by donors and grantees in a shared learning agenda:

- How do civil society strategies to promote data use differ across user groups and how do those strategies affect the achievement of project goals?
- How do civil society strategies to promote data use differ across administrative levels and how do those strategies affect the achievement of project goals?
- How do international mechanisms support or hinder data for accountability initiatives?

To answer these questions and provide an update on the use of data for anti-corruption in Nigeria, we reviewed grey and academic literature, blogposts and reflection pieces by organizations working in Nigeria, and carried out interviews with ten Nigerian experts. We found that there is significant progress in securing high-level political commitment and increasing the capacity of civil society organizations. However, the implementation of government commitments has not been effective in overcoming most of the challenges identified previously by TAI. We explore causes of this mixed progress and provide insights that can inform future efforts to support local champions in addressing the system dynamics that are hindering progress in the country.

In this document we present headline findings emerging from the literature review, interviews, and Global Integrity’s experience supporting projects related to the use of data and dialogue with partners in Nigeria. Sections 1, 2, and 3 outline the approach used for the review and discuss progress and remaining challenges since TAI’s research in 2018. Then, section 4 covers the main dynamics among user groups in driving progress towards increased use of data. We find that civil society’s capacity and collaboration with other groups has increased significantly and that while their approaches have diversified it’s a good time to test new and refined approaches.

In section 5, we take stock of the dynamics of data use at the subnational level. We identify increasing interest by subnational governments to open data, but note that this interest has been mostly in response to top-down initiatives thus failing to address power and technical dynamics that hinder the use of this data to fight corruption and demand accountability. Section 6 explores the role of international mechanisms in promoting the use of data. We find these mechanisms have effectively encouraged high level political support and kickstarted data publication, but low levels of ownership and investment by Nigerian government agencies hinder the implementation of commitments and the achievement of results. Finally, Section 7 presents a number of recommendations about the way in which TAI members and other donors can more effectively support progress to improve the impact of efforts to use data for accountability and anti-corruption in Nigeria.
1. The use of data for accountability and anti-corruption

The process leading from data production, through data use to achieve improved development results, is both technical and political (see figure 1). Technical and political dynamics interplay to generate value or to stall the achievement of relevant progress in accountability, corruption, and development results. On the technical side, this process has six building blocks: data production, data sharing, data use, response by target audiences, accountability, and changes that lead to improved development results. These moments are usually seen as a linear technical process, but in practice are rarely linear. For instance, data use - often seen as an additional building block - is in reality an important driver for shifting the incentives, practices, and relationships that underlie the publication and sharing of quality data, as well as the engagement of audiences and activation of accountability mechanisms. This is especially the case when talking about contested datasets that can disrupt economic and political dynamics.

In contexts with low levels of data production and transparency, it is difficult to change standard practices. Using data obtained through freedom of information requests, whistleblowers, or from other jurisdictions to evidence injustice, waste, and corruption can shift the incentives of powerful actors, pressing them into improving data production and sharing.

The use of these types of data can also mobilize citizens and activate accountability agencies or generate incentives for public servants to behave in more accountable and responsive ways. Such dynamics can lead to better development results by improving service delivery, preventing or catching corruption, and enhancing public participation and dialogue between government and civil society. International actors can support these initiatives by providing technical assistance for data analysis and communication, facilitating collaboration, and strengthening advocacy.

Conversely, the lack of data use and lack of citizen engagement – due to apathy or fear of repercussions, among other factors – can hinder the whole process, creating an excuse for powerful actors to not disclose information, or disclose it in ways that are not useful in relation to revealing or tackling corruption and mismanagement. The lack of data use can also be linked to lack of social mobilization and the inactivity of accountability agencies. Such a situation would likely lead to the persistence of unequal and inefficient incentives, practices, and relationships among relevant stakeholders, failing to shift power dynamics that hinder the achievement of development results.

Many organizations working to promote data use for accountability are aware of this. In most contexts, there are projects that support civil society’s efforts to press for government publication of data through investigations and advocacy, as well as projects to incentivise and support government publication of data through open data platforms. Yet, oftentimes, the coordination among those initiatives is weak and most resources are targeted at supporting governments in producing and publishing data. In Nigeria, donor support has enabled the deployment of data collection and sharing tools and helped to increase civil society and media capacity to use data to
mobilize citizens and demand accountability. Additionally, international mechanisms have spurred multistakeholder dialogue and collaboration around the implementation of Open Government Partnership (OGP) commitments and created incentives for data publication at the subnational level, through adherence to OGP commitments and implementation of World Bank funded projects. This progress is remarkable but it has been mostly focused on data production and sharing with low levels of data use by the government to improve processes (see Annex 1). There are various challenges to move towards impact through the use of data.

These challenges include:

- Political party dynamics stalling investigations and hindering anti-corruption activities
- Constant changes in personnel and funding in key government agencies
- Weak government capacity for and interest in complying with data publication policies
- Weak enforcement of regulations
- Low levels of interest in the government to use these new sources of data

In the following sections, we identify political and technical factors that are hindering the use of data to achieve impact through the use of data on open contracting and tracing illicit assets. We then build on these findings to propose recommendations that can inform donors’ and practitioners’ efforts to build on current progress and devise innovative approaches to shift the underlying incentives, practices, and relationships that stand in the way of the effective and impactful use of data.
## TAI FINDINGS

### DATA AVAILABILITY AND QUALITY

- Data relevant for anti-corruption is hard to find
- Poor data quality and the complexity in which datasets are published were an important barrier to data use.
- The National Open Contracting Platform (NOCOPO) was launched. It is based in the Open Contracting Data Standard, but the data it collates is often untimely and incomplete.
- The Nigerian Extractive Industries Transparency Initiatives’ Beneficial Ownership Portal (NEITIBO) provides data related to the extractives industry, however this data requires a lot of cleaning, is not validated, and doesn’t enable beneficial owners to be identified. The Corporate Affairs Commission (CAC) committed to launch a Beneficial ownership portal in 2020.
- Data on asset declarations remains closed.
- The Freedom of Information Act (FOI) requests were difficult to use and usually received a slow response, if any.
- FOI requests are still hard to use, often getting slow or no responses, but civil society has increased their capacity to use them, demanding compliance through the judiciary, to demand accountability.

### DATA ANALYSIS AND UPTAKE

- Analysis skills were low and this, alongside the challenges in using available data, disincentivized data use.
- Data analysis capacity of Civil Society Organizations (CSOs) and journalists has increased significantly, enabling them to revamp data portals and carry out timely analyses. This has strengthened their role as infomediaries and their ability to support training for government agencies.
- Media houses were underfunded and reluctant to publish data-based stories.
- Media houses are beginning to see the value of data-driven storytelling publishing stories, in many cases even creating in-house groups for such reporting. Data journalism startups have also emerged.

### DATA-DRIVEN COLLABORATIONS

- Siloes among users of data for anti-corruption were relevant, but there were also collaborations that could be expanded.
- Collaboration and knowledge sharing among data users has increased, yet collaboration that goes beyond projects or specific activities is hard to sustain.
- Collaboration with government can be relevant to advance data initiatives but relationships are hard to build.
- Multistakeholder initiatives, such as OGP and EITI, have enabled spaces for collaboration among government, CSOs, and private sector, including working groups on anti-corruption and public procurement and relationships with reformers in government. However, these collaborations require an investments of time and effort by CSOs and other stakeholders that is hard to sustain.
- Development partners and multilateral institutions providing support, grants, and loans to governments at national and subnational levels can improve by including provisions for data production, storage, and sharing of data in agreements.
3. What is hindering efforts to open up data?

High level political support for the use of data for anti-corruption is mixed and fails to reach bureaucracy

International commitments and engagement in multistakeholder governance initiatives have provided space for the government to implement initiatives for data production and sharing such as NOCOPO and NEITIBO. These organizations create spaces for dialogue and collaboration and pass executive orders on public procurement and legislation such as the Companies and Allied Matter Act (CAMA) and the Executive Order 6 of 2008.

This high level political commitment and support has failed to reach full operational transparency, and thus has not enabled the creation of enough incentives to shift bureaucratic practices and relationships in a way that leads to improved accountability and effective anti-corruption.

Incentives for data publication and use in government are weak and not enforced

The agencies leading work on opening data do not have enough capacity and authority to train government agencies, ensure the quality of the data reported, and enforce compliance with data publication requirements. This situation, paired with the persistence of practices of partial compliance, i.e. sharing vague information on transactions or descriptions of payments, leads to data publication that is incomplete, inaccurate, and reported by a limited number of agencies.

Relevant political practices that hinder effectiveness in data publication and use include:

- The National Assembly has not passed legislation needed to open up information relevant for fighting corruption - such as asset declarations - while providing safety to individuals engaged in corruption by stalling investigations through political capture of accountability institutions.
- The heads of anti-corruption agencies are changed at discretion, affecting the continuity and effectiveness of data opening and investigations. This is common at national and subnational levels where applicable.
- Overlaps in the jurisdictions and functions of Anti-Corruption Agencies and ACAs hinder collaboration among them and with law enforcement agencies, an issue that also makes it hard for those denouncing corruption.
- The inconsistent allocation and disbursement of resources to ACAs hinder their capacity to implement their plans for each year, with resources often arriving late or not being disbursed due to changes in the federal budget.
- Inconsistent policies and programs of government with conflicting influence and impact on assets recovery management and disposal, demobilizing commitments and support from non-state actors.
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- Inconsistent policies and programs of government with conflicting influence and impact on assets recovery management and disposal, demobilizing commitments and support from non-state actors.

- In NOCOPO, data is mostly outdated, incomplete, and fails to meet users’ needs. There are ongoing efforts to deploy an e-procurement portal that can improve data collection and sharing, however both capacity and incentives for data publication should be taken into account to prevent the replication of practices that make NOCOPO unreliable.
- In NEITIBO, data does not enable the identification of beneficial owners and suffers quality issues as it is reported by companies with no verification or implications for inaccuracies or gaps. With the passing of the Companies and Allied Matter Act (CAMA) the Corporate Affairs Commission (CAC) is launching a beneficial ownership portal with support by the World Bank’s multi-donor trust fund, Global Integrity Anti-Corruption Evidence Programme.
Data publication runs parallel to procurement and anti-corruption practices

In practice, there are no existing initiatives led by the government to use data published through the implementation of international commitments. Both literature and interviews make clear that opening data for accountability and anti-corruption is largely a compliance-led process.

- NOCOPO has prioritized the publication of the minimum fields in the Open Contracting Data Standard (OCDS), yet data is not compliant and the portal does not use any extensions needed to make data useful in the Nigerian contexts. Additionally, there is no evidence of the data in the portal being used for anti-corruption or efficiency purposes.

- Data relevant for preventing money laundering and illicit financial flows is reported by banks and port authorities, nevertheless it seems that it is not used to identify and prosecute suspicious cases (see this piece).

- There is a multiplicity of reporting formats in which agencies have to report procurement and spending data, and those formats are used by other government agencies and ACAs, which render reporting to the Bureau of Public Procurement (BPP) as an additional procedure that is unprioritized.

- Anti-corruption activities seem to be more reactive than proactive due to the prevalence of existing practices, funding constraints, and coordination challenges.

To some extent, the lack of interest in using data from these open sources can be explained for three reasons:

- Procurement practices, even when not related to corruption, tend to not comply with formal procedures and rely on personal relationships between buyers and sellers. This affects both government incentives to use data and private sector actors’ perception about the value of using data and reporting inappropriate behavior, as both practices are seen as inconsequential or even affecting the potential of winning future bids.

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- Anti-corruption activities seem to be more reactive than proactive due to the prevalence of existing practices, funding constraints, and coordination challenges.
4. What are the existing drivers of data use?

Corruption has remained high in the political agenda sparking citizens’ interest and mobilization, yet corruption messaging needs to evolve to effectively take advantage

Citizens’ interest and mobilization against corruption has grown in recent years. This has enabled civil society organizations and government reformers to use this momentum to engage citizens and provide them with information and capacities to act against corruption at federal and subnational levels. Nevertheless, recent research shows that the outright rejection of the existence of corruption might be an ineffective, if not risky, move. Cheeseman and Peiffer find that general anti-corruption messaging can generate “corruption fatigue” and lead citizens to see corruption as commonplace and cannot be changed, thus hindering collective action. Nonetheless, they also find that different groups tend to respond differently to anti-corruption messages and that there are some ways to frame messages that can motivate action (such as framing corruption as stealing taxes paid by citizens and deprivation of their social benefits and rights). There is a need to further advance the understanding of the audiences that are targeted with anti-corruption messages, how to engage these audiences, and the actions that the messages are inviting them to take.

Civil society and media capacities to access and use data to fight corruption and address issues that are relevant to citizens have increased significantly

CSOs’ and data journalists’ capacity to access and use data has increased significantly, enabling them to refine and test approaches to use of data for accountability and anti-corruption, and to strengthen their role as infomediaries to make government data useful. These data capacities are evident in the important role that these stakeholders are playing in building capacities and supporting government initiatives.

There is a thin line to walk balancing collaboration and support to government agencies’ priorities and demanding increased transparency and accountability, yet the diversity and strategies of Nigerian organizations is enabling them to walk it successfully. This balancing should be complemented with further deliberation and agreement on the priorities of multistakeholder collaboration, so these can evolve from getting data published towards using that data for accountability, anti-corruption, and improved service delivery.

There has been a diversification of entry points to use data to engage government agencies and demand accountability

In addition to the use of data on budgets, procurement, beneficial ownership, and citizen feedback, Nigerian CSOs have continued to test the limits and potentials on using data for accountability and anti-corruption. These explorations have the potential to take advantage of alternative entry points to engage government, anti-corruption agencies and mobilize citizens.

Some examples include:

- Follow-up on the handling of corruption cases by the judiciary

This roles encompass several activities, including:

- Training government staff on data production and use
- Support in the design and deployment of data portals and tools
- Collaboration in visualizing and sharing data
- Facilitating engagement with target audiences to inform data strategies
- Public interest litigation and judicial action for the release of information
• Tap into other public sources of data, such as the legislative and audit institutions to trace the allocation and use of public money, as well as the achievement of development results.

• Empowering victims, insiders, and whistleblowers to take action against corruption through investigations, stories, complaints, and litigation.

Some of these approaches are nascent and require targeted support. Some of the support for these innovations was provided by the DFID-funded Mobilizing Open Data for Anti-corruption program and the termination of this program has left an important void. The use of additional entry points and innovations can take advantage of windows of opportunity to pressure decision-makers into taking action, thus promoting shifts in entrenched incentives, practices, and relationships that are limiting impact.

5. How are these dynamics scaling down to the subnational level?

Increased interest by subnational governments to publish data has been mostly enabled by external drivers.

There have been improvements in transparency and openness at the state level in Nigeria. Eighteen subnational governments have joined OGP and committed to publish data on budgets, provide opportunities for citizen participation, and improve public procurement. Additionally, 24 state governments have received grants ranging from USD 1.5 million to 11 million, from the States Fiscal Transparency, Accountability and Sustainability (SFTAS) program led by the World Bank as incentives for fiscal transparency – and other fiscal measures related to debt, income, and traceability of resources.

Subnational transparency and accountability efforts have generated some results including: increased citizen participation in budget processes either through need assessment initiatives or spaces for deliberation in local legislative bodies; publication of audited budgets (See BudgIT’s State of States report); the establishment of single accounts; and the initial publishing of procurement data - including through portals in states like Kaduna, Anambra, and Abia.

There is a risk of replicating dynamics of publishing low quality data and low data use at the subnational level.

CSOs and federal government agencies engaged in OGP along with the incentives and support provided through SFTAS, have played an important role in getting state authorities interested in transparency and accountability and promoting participation by local civil society. However, weak capacity in government and civil society at the state level as well as low political incentives risk making these subnational processes empty are not conducive to accountability and effective anti-corruption. Politicians facing corruption charges at the state level build ties with parties in the National Assembly and see the investigations against them stalled or dropped.

Interviewees highlighted that most states see transparency and accountability as a box-ticking exercise to access incentives or get recognition for implementing open government initiatives. Oftentimes, when information is published it is not in open formats or misses important details that reduce the value of the data. For instance, budgets might be opened but information on spending remains closed. Subnational parliaments are often captured by the executive and separation of power is eroded. Additionally, state level government capacity remains very low and the capacity of local civil society to demand greater transparency and participation from their governments is also weak. Efforts to effectively use data for accountability and anti-corruption depend heavily on the role of central CSOs that have developed the capacities to use federal data to identify projects and investments and mobilize citizens around these.
6. How do international mechanisms support or hinder data for accountability initiatives?

International mechanisms have kickstarted dynamics for data publication and dialogue between government and civil society, however these processes have focused on technical support for data publication.

International mechanisms such as OGP, the World Bank, Open Ownership, and the Open Contracting Partnership (OCP) have encouraged and supported the production of data portals that provide technical means to comply with international standards and to share information in open formats. This support has also helped to strengthen data capacities in CSOs and some government offices while promoting dialogue across different stakeholders around data production and sharing processes. However, these dynamics have focused on transparency and are yet to generate incentives for data publication and use that go beyond compliance in a context characterized by weak enforcement of rules.

According to OGP’s Independent Reporting Mechanism data, the design of commitments related to procurement and tracing illicit assets in Nigeria’s first national action plan have at best moderate potential impact. Additionally, political factors that hinder the implementation of international commitments and the use of data for accountability and anti-corruption include legislative interests in blocking needed reforms, party dynamics being used to stall investigations, and low incentives and support for reformers in government.

7. How to more effectively drive progress towards impact?

Low levels of national investment in the implementation of international commitments have failed to create ownership in reforms.

The OGP process in Nigeria has mostly been supported by donors, either through funding CSO engagement in it or through support to government agencies for the implementation of specific commitments such as the launch of NOCOPO or the development of the beneficial ownership portal. In practice, agencies lack the means to access government funds to advance the implementation of initiatives of data publication. This leads to lack of ownership of the initiatives by reformers in government and risks the prevalence of external perspectives and goals, over local innovations needed to accurately identify local challenges, and devise innovative ways to leverage data to address local problems that stand in the way of achieving impact in the fight against corruption.

In this review we have found that efforts to promote the use of data for accountability in Nigeria show mixed results. Government agencies are facing many challenges to effectively implement data production, storage, and sharing initiatives. A strong and vibrant civil society continues to
find ways to innovate in how they get and use data to mobilize citizens, activate accountability mechanisms, and ultimately support community efforts to achieve improved service delivery. We then highlight that many of these issues are not only a consequence of limited government commitment and investment for improving data publication, but the causes go deeper and relate to the prevalence of entrenched incentives, practices, and relationships that in practice oppose and hinder efforts to achieve results in accountability and anti-corruption through the use of data.

The following are a series of recommendations that donors, international organizations, and Nigerian stakeholders can use to build on existing progress and target system dynamics that hinder progress towards impact.

Complement building public officials’ capacity with creating incentives for them to innovate using data in their work. Capacity building and compliance can only drive progress in the use of data so far. There is a need to promote government innovation to address accountability, corruption, and service delivery challenges to enable data initiatives to shift prevalent practices and relationships within government and between government and civil society. Additionally, such combination can increase the value of increasing CSOs’ efforts to support government in building awareness and capacity in government at local and federal levels.

Promote the diversification of goals in multistakeholder collaboration. Most current collaborations between government and civil society are focused on transparency – transforming data production and implementing portals – while most instances of impact are about addressing problems that affect citizens. Incentivizing collaborations to use data to achieve accountability, anti-corruption, or development goals can help to accelerate progress towards impact and identify new incentives that can be used to get support from decision makers and bureaucrats.

Help generate incentives for reformers in government and anti-corruption agencies. Existing reformers in government face important challenges to advance reforms, from path dependence to open opposition from vested interests, which often outweigh the incentives they might have through international recognition. Civil society can play an important role in supporting these reformers through actions such as identifying and supporting win-win initiatives that do not directly challenge vested interests and developing narratives that can highlight the value of their work or activate citizens to support these efforts.

Support and strengthen sustainable coalitions that cut across levels of government and sectors. Most innovations in the use of data for accountability and anti-corruption in Nigeria have come about through collaboration among CSOs at different levels of government that use data from different types of resource flows in strategic ways. Building on improvements in CSOs’ capacities and the preexistence of collaborations across levels of government can be an effective way to generate sustainable dynamics for building up capacities for data use and achieve impact at the state and local levels. This can also help mitigate existing risks around empty processes of transparency and accountability at subnational levels.

Facilitate capacity building for collaboration between governments and with CSOs related to tracing and forfeiture of illicit assets. Ineffective collaboration between ACAs of countries of origin and destination countries is an important factor hindering the recovery of illicit assets despite the whistleblower incentives. The failure of ACAs to forge alliances limits their capacity to take advantage of media and CSOs’ connections and resources. Development partners can facilitate media and CSOs’ engagement with ACAs in the tracing, forfeiture and recovery of illicit assets. Data production and sharing of recovered illicit assets can be an effective tool to promote accountability and encourage stakeholders to engage in investigations and filing complaints.

The results and recommendations presented in this document will be complemented with evidence from in-depth work with HEDA and PPDC around the effectiveness of innovative approaches to promote the use of data for accountability and anti-corruption in Nigeria. These results will be ready in early 2021. Additionally, similar results from work on the use of extractives industries data is being carried out in Colombia with Transparencia por Colombia and Corporación Comunidad de Juristas Akubadaura. The results from that work will complement findings from Nigeria and will be available in summer 2021. We hope the reflections in this note are useful to donors, governments, and civil society organizations working to fight corruption and improve accountability through the use of data. In the meantime, we are keen to continue the conversation and hear what resonates to others in the field and to learn more about the experiences and lessons from their work.
Annex 1. Engagement of government and civil society along data publication and use

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<th>DATA PRODUCTION</th>
<th>DATA SHARING</th>
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Harvey, J. Making records open does not always make them useful. Global Integrity Anti-Corruption Evidence. https://ace.globalintegrity.org/openregisters/
Harvey, J. Are Promised Changes to Nigeria’s Anti-corruption Architecture Built On Sand?.. Global Integrity Anti-Corruption Evidence. https://ace.globalintegrity.org/are-promised-changes-to-nigerias-anti-corruption-architecture-built-on-sand/


