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APPENDIX 3

NIGERIA CASE STUDY

DRG LEARNING, EVALUATION,
AND RESEARCH ACTIVITY:

TASKING N007

FINAL PERFORMANCE EVALUATION
FOR THE LEGAL ENABLING
ENVIRONMENT PROJECT II (LEEP II)

August 2018

Contract No. GS-10F-0033M/AID-OAA-M-13-00013

This publication was produced for review by the United States Agency for International Development. It was prepared by NORC at the University of Chicago. The author's views expressed in the publication do not necessarily reflect the views of the United States Agency for International Development or the United States Government.

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USAID DRG-LER

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ACRONYMS

CAC	Corporate Affairs Commission
COSEP	Consejo Superior de la Empresa Privada
CSO	Civil Society Organization
DRG-LER	Democracy, Human Rights, and Governance-Learning, Evaluation and Research Activity
ECNL	European Center for NGO Law
FATF	Financial Action Task Force
FIRS	Federal Inland Revenue Service
ICNL	International Center for Non-Profit Law
KII	Key Informant Interview
LEEP II	Legal Enabling Environment Project II
NFIU	Nigerian Financial Intelligence Unit
NGO	Non-governmental organization
NLM	NGO Law Monitor
NNNGO	Nigerian Network of NGOs
SCUML	Special Control Unit on Money Laundering

BACKGROUND ON NIGERIA

Nigeria, the most populous nation in Africa (190.6 million population, 2017 est.), has a relatively open environment of politics and free expression as well as an organized civic sector that significantly pre-dates the country's 1960 independence. After its descent into civil war and military rule, Nigeria adopted a new constitution in 1999 and made a peaceful transition to civilian government. The government continues to face the daunting task of institutionalizing democracy and reforming a petroleum-based economy, whose revenues have been squandered through corruption and mismanagement. In addition, Nigeria continues to experience longstanding ethnic and religious tensions. Although both the 2003 and 2007 presidential elections were marred by significant irregularities and violence, Nigeria is currently experiencing its longest period of civilian rule since independence. The general elections of April 2007 marked the first civilian-to-civilian transfer of power in the country's history.

Nigeria is also Sub-Saharan Africa's largest economy, with a Gross Domestic Product (GDP) per capita (PPP) of US \$5,900 (2017 est.). The country relies heavily on oil as its main source of foreign exchange earnings and government revenues. Following the 2008-09 global financial crises, the banking sector was effectively recapitalized and regulation enhanced. But economic diversification and strong growth have not translated into a significant decline in poverty levels; over 62% of Nigeria's people still live in extreme poverty. Nigeria entered recession in 2016 as a result of lower oil prices and production, exacerbated by militant attacks on oil and gas infrastructure in the Niger Delta region, and detrimental economic policies including foreign exchange restrictions. GDP growth turned positive in 2017 as oil prices recovered and output stabilized.¹

Since 1999, civil society, political competition, and open debate via the press, airwaves, and social media have blossomed – albeit within implicit limits policed by the military and security services. CSOs cluster in networks based loosely on sectors or themes including education, gender equity, and health concerns such as HIV. Interviewees suggest that these networks are more often driven by personalities and fund-raising imperatives than by strategic vision or institutional sustainability, and their appeal usually does not reach far beyond the regional base of their leadership.

Nigerian press remains largely free. Journalists, however, face harassment, and the implementation of a 2015 Cyber Crime Act threatens to curtail freedom of expression. Arrests of journalists are not uncommon, with recent instances based on such offenses as severe criticism of senior officials and the army, and coverage of sensitive religious issues. The director of defense information announced in August 2017 that the military would monitor social media for “hate speech, anti-government and anti-security information.” The government also directed the National Broadcasting Commission to sanction any radio or television station that broadcasts hate speech, and threatened to prosecute people for this reason under the Terrorism Prevention Act.²

¹ <https://www.cia.gov/library/publications/the-world-factbook/geos/ni.html>

² <https://www.hrw.org/world-report/2018/country-chapters/nigeria#761225>

PROGRAM CONTEXT: LEEP II IN NIGERIA

ICNL does not have a presence in Nigeria, nor any program of periodic visits. Rather, it intervenes through its national partner, the Nigerian Network of NGOs (NNNGO), and also coordinates with others, notably ECNL, on a less regular basis. The participation of NNNGO is supported under LEEP II by way of sub-grants, recent instances being one for \$20,668 (Mar. 2016 to Jan. 2017) and another for \$21,954 (Sept. 2017 to Feb. 2018). NNNGO, founded in 1992, is a coalition of some 2,400 organizations. It was formed under an agreement by government, donors and embassies, with 60 members at inception. Its current Executive Director assumed leadership in 2012 and was a member of CIVICUS. The Network in 2012 developed a five year strategy (2012-2017) with the following objectives: 1) to protect civic space, 2) build the capacity of non-profits, and 3) campaign to achieve the SDGs in Nigeria. The organization has a partnership with the University of Ibadan to provide internship opportunities for master's-level students – and currently has five interns and seven paid staff.

LEEP II-supported activities in the last few years have included the following.³ ICNL supported NNNGO's successful advocacy efforts against the Social Media Bill, which would have imposed criminal penalties for errors in posts on Facebook and WhatsApp. The Bill was withdrawn in 2016 in the face of widespread opposition from civil society and the international community. ICNL also recommended improvements to the Not-for-Profit Organizations Code of Governance – a code promulgated in 2016 by a committee established under the Ministry of Trade and Industry. Also, NNNGO held a series of discussions with the National Assembly leadership on the NGO regulations and with the Federal Inland Revenue Service on NGO tax laws.

Beginning in 2016 and continuing to date, NNNGO has been arguing publicly and mobilizing opposition against the NGO Regulatory Agency Bill, which aims, among other objectives, to introduce a powerful regulatory commission and to restrict a number of protections and freedoms for non-profits in Nigeria. The Bill would require NGOs to register with the Commission and to submit their strategic plans and budgets. Registration applications would be reviewed by the relevant sectoral ministry – and NGOs could be denied or de-registered if they did not provide complete information. ICNL prepared an analysis of the Bill, which was shared with NNNGO and then a wider audience in the National Assembly and civil society. The Bill passed its second reading, but opposition appears to be succeeding in preventing it from passing out of committee for the next stage. NNNGO is leading advocacy efforts to ensure the Bill does not pass in the National Assembly, and has used ICNL's analysis in addressing the Bill in several public forums. Interviewees suggest that the impetus for the Bill comes from terrorism concerns, and the desire to shut down NGOs that may be serving as a financial conduit to insurgents.

³ Annual Programmatic Report October 1, 2015 – September 30, 2016; Annual Programmatic Report October 1, 2016 – September 30, 2017.

NNNGO's goals under its two recent sub-grants from ICNL included (1) institutionalizing engagement with the Senate and House of Representatives Committee and with the Federal Inland Revenue Service; (2) convening a sector-wide conference to discuss the Companies and Allied Matters Act (CAMA) and help participants gain a deeper understanding of the NGO sector in Nigeria; and (3) improving understanding among non-profits on tax and tax-related issues. NNNGO has undertaken a range of activities to achieve these goals. One was to convene the first dialogues between the regulatory Corporate Affairs Commission (CAC) and NGOs, with close to 250 participants from 23 States of the Federation, and the aim of improving the relationship between the CAC and NNNGO, as well as its members, on issues of NGO regulation. NNNGO also conducted a campaign to raise awareness of the benefits of civil society to the general public, and also presented comparative research by ICNL in deliberations with the Financial Reporting Council in the Nigerian Ministry of Trade and Investment.

Under LEEP II Objectives 2 and 3, capacity-building and research activities were carried out including the following. ICNL issued calls for fellowship applications and extended an invitation to a prospective Nigerian candidate. Research fellows conduct their fellowships in ICNL's Washington, D.C. offices. The fellow's research focused on the legal framework governing freedom of assembly, association and expression online in Nigeria in comparison with international legal norms. Publications by ICNL, to which NNNGO contributed, included updates to the *Civic Freedom Monitor: Nigeria* and the *Nigeria Philanthropy Law Report*. ICNL also contributed to the *Guidelines on Freedom of Association and Assembly in Africa* issued by the African Commission on Human and Peoples' Rights. Last, NNNGO conducted research to gauge the economic impact of Nigerian non-profits, and issued its findings to over 2,000 NGOs through plain-language information and infographics.

EVALUATION QUESTIONS

QUESTION I: HOW HAS LEEP II CONTRIBUTED TO A MORE ENABLING LEGAL ENVIRONMENT FOR CSOS/NGOS IN THE TARGET COUNTRIES, AS WELL AS REGIONALLY (IF APPLICABLE)?

As for direct effects of ICNL under LEEP II, the most important point appears to be its ability to bring credible international expertise to the table when matters of civil society law and governance are discussed. Interviews stressed ICNL's specialized comparative law competence, and its ability to bring to bear international norms and findings on free association – for example in crafting responses to proposed NGO regulatory legislation. Legal arguments based on international standards and comparative good practice add a powerful tool to advocacy on behalf of protecting civic space.

ICNL has supported NNNGO through various means including teleconferences, workshops, and webinars on select topics, often bringing in colleagues from Africa and beyond. This includes several webinars with the African Financial Action Task Force (FATF) network.

NNNGO describes the process of working with ICNL as follows. When an issue arises, ICNL staff respond quickly, making themselves available to work with NNNGO on the matter. NNNGO provides the background and problem description. ICNL responds by explaining the international legal position and providing material to support arguments based on it. NNNGO members write the advocacy piece or policy review and has ICNL review it before making it final. The process of concluding sub-grant agreements follows a similar pattern, with NNNGO proposing a plan of action and a budget, and then ICNL responding with comments and discussion. From NNNGO's perspective, it is important that ICNL does not impose a preconceived template or logframe. This allows NNNGO to focus in on "hotspots" where its members encounter problems with regulation.

Most interviews in Nigeria focused on the activities of NNNGO. The impacts here included stopping proposed legislation that would shrink civic space, bringing NGOs into active participation in policy debates, and educating the public about issues of law and the civic sector. LEEP funding was instrumental in supporting advocacy on the NGO Bill, enabling NNNGO to mobilize members to attend the public hearing on the Bill, engage the regulators, and develop a policy brief on the Bill. Technical and financial support from ICNL due to LEEP II funding allowed NNNGO to hold sector-wide conferences between the regulators (including CAC, Special Control Unit on Money Laundering, Federal Inland Revenue Service, and Nigerian Financial Intelligence Unit) and the NGOs, thus helping forge a partnership between the Network and the regulatory agencies. NNNGO also helped defeat the bill to regulate social media. NNNGO's insistence that new measures should meet international standards shaped the debates. NNNGO also works with CAC, which has reportedly adopted about half of the recommendations it has made on regulatory practice.

The regulatory commission initiative began as a private bill, and thus Senate committee staff were in the dark about it until NNNGO alerted them. Then, NNNGO played an instrumental role in stopping it. This was due in part to ICNL/NNNGO's careful analysis of the bill, which was framed as a response to FATF requirements and to pressure by the EU. NNNGO and ICNL found the bill to be unduly restrictive for CSOs.

NNNGO brought its member organizations into the legislative debates by keeping them informed via e-mail and Skype calls, supporting their travel to the capital, and facilitating their attendance at legislative sessions as well as official meetings. Some members were able to deliver position papers before legislative committees.

NNNGO's efforts also depended on its network of contacts and supporters in the National Assembly, hence its ability to reach out to legislators and staff, sharing information and encouraging allies to contribute policy papers. NNNGO's ability to provide resources in the form of information and analysis, added to its network of legislative contacts, helped open doors and advance its position.

Public awareness-raising and education were also major focal points for NNNGO. One aspect of this was educating legislators and executive officials about the issues and stakes involved in CSO-related law and regulation. More broadly, NNNGO raised awareness among its members (see below) and reached out to the general public. For example, NNNGO members have become a regular guests on a public affairs radio show, where they provide NNNGO's

perspective on laws affecting civil society and also recommends other speakers who can address related matters. Further, NNNGO has held town halls, joined other NGO forums, and used social media to further public awareness. By one account, NNNGO is “at the forefront of the effort to prevent government overkill” in the treatment of NGOs and is a voice for sanity, dialogue, and the need for government and the civic sector to agree on basic standards. Thus, NNNGO serves as an interface between civil society and government on policy issues, opening up space mutual understanding and mediating dialogue.

QUESTION 2: HOW EFFECTIVE HAS THE PROJECT BEEN IN BUILDING LOCAL CAPACITY AND MOVING THE COUNTRY TOWARDS SUSTAINABLE POSITIVE CHANGES IN THE CIVIL SOCIETY LEGAL ENABLING ENVIRONMENT?

ICNL has partnered with NNNGO since 2012. In addition to providing technical assistance on draft legislation, ICNL has helped NNNGO strengthen its capacity as a civic network and source of CSO policy expertise and advocacy. According to ICNL, its support (in addition to sub-grants) began with information and skill-development, and built up year by year, evolving into joint work on legislative review and advice to the CAC and Inland Revenue. NNNGO reports that learning was transmitted largely through informal means, with its staff and interns working alongside ICNL on legislative review and advocacy.

NNNGO has increased its membership, built relationships with academics around Africa, and taken a more robust role in analyzing policy proposals and heading off potentially constraining regulation on NGOs, media, taxes, and other matters. This culminated in NNNGO taking a lead role in crafting a unified civic sector message of opposition to the proposed NGO regulatory bill in late 2017. NNNGO is increasingly sought out by policymakers and the media as a source of expertise in this area.

Thus, ICNL’s approach has been to strengthen its local partner while gradually stepping into a supporting role on policy analysis and advocacy. This strategy is well-suited to ensuring a sustainable capacity for civic policy advocacy in Nigeria, although the ultimate ideal – as pointed out by some actors in the sector – would be to have other organizations in addition to NNNGO playing this role.

According to NNNGO’s final report for 2016, “The consistency of support (technical and financial) by ICNL in the last four years and the freedom given to NNNGO to set its own agenda on how best to carry out the implementation of activities aimed at improving civic space in Nigeria is an important lesson for the successes achieved...This hand holding experience by ICNL has meant that NNNGO now has the capacity to lead effectively on the issue of civic space in Nigeria.” NNNGO backed this up in interviews, stating that it could not achieve what it has without ICNL technical support. This has allowed it to approach policymakers and regulators on the basis of equality as colleagues, and to convene meetings of all involved, as with recent national conferences each involving some 300 CSOs and regulators.

Since 2012, ICNL/LEEP II support has expanded NNNGO’s resource base, enabling it, for example, to fund some trips by members to lobby the National Assembly in Abuja. NNNGO leverages its resources through its relationship with the University of Ibadan, where it draws interns from the master’s degree program in sustainable development. Also, it is increasingly

able to obtain funding and connections from other sources such as CIVICUS, Open Society, the Government of Nigeria’s CAC, and the private sector.

On an individual level, LEEP II demonstrated positive direct influence on capacity building through its work with the program’s Research Fellowship. During the two-month fellowship, based at the Washington offices of ICNL, the researcher redefined his work to focus on internet expression and digital rights. ICNL provided mentoring, and linked the fellow with relevant contacts in the U.S. government and several NGOs. Upon the fellow’s return to Nigeria, he founded an NGO, has pursued legislation on digital rights, and filed legal cases – including one pending (as of July 2018) before the High Court. He is reaching out to other lawyers and seeking grant funding to expand his work.

In more indirect impacts, LEEP II also influenced local capacity in Nigeria. NNNGO member organizations consistently praised the information and training provided by the Network, and hoped for more. These NGOs, from across Nigeria, felt that NNNGO filled an informational void from which they suffered, and gave them access to the processes of policymaking and advocacy. “We don’t have the information they have in Lagos,” said one NGO leader. Regular email updates from NNNGO continued the flow of information and sought member input, while also sustaining contact among members and thus the vitality of the network. This, in turn, helps to expand the network, as members share know-how from the workshops with non-members, and encourage them to join.

Training workshops brought NNNGO members into contact with other Nigerians working in similar areas, and provided vital guidance on organizational structure, registration, accounting, planning, fund-raising, documentation, and legal developments in such fields as NGO regulation, taxation, and money laundering. “Master” training for NGO directors was also provided. Some of the workshops featured speakers from government departments dealing with NGOs, including CAC and SCUML. In addition to providing information, the trainings offered opportunities for discussion and peer learning. Not all members could afford to travel to Lagos for workshops or to Abuja for official meetings – and some expressed the wish for travel support in future.

Interactions with officials allowed NNNGO to play both a training and a mediating role in helping the civic sector understand and comply with existing regulations. Visits to Abuja brought select members into contact with legislators and with officials of the agencies just mentioned as well as the Economic and Financial Crime Commission (EFCC), which also oversees NGOs as part of its remit. Member NGOs were able to ask questions of government officials and air their opinions about the regulations.

NGO interviewees said that they put guidance from the training sessions into practice by adjusting and properly formalizing their legal structures, regulatory filings, and accounts – and launching proposals for new programs. Some members are using the knowledge gained to raise concerns with state-level governments, and they expressed interest in getting information and support on this topic. The NGOs also expressed a sense of empowerment, of having greater confidence in dealing with both policy and organizational issues, of having a support group that provides mutual aid and information-sharing, and of being part of a coalition actively lobbying on CSO issues.

NNNGO is also a service provider. Interviewees stressed that it responds to requests for help with legal and organizational issues from both members and non-members. Among the recipients are media organizations – for example, NNNGO has helped educate radio broadcasters to address civic sector issues. Further, NNNGO plays a civic sector umbrella role, linking funders to relevant NGOs on the ground and providing guidance to both sides. (A concern was expressed that this role can turn into a kind of monopoly control point – see below.)

Public officials have also benefitted from NNNGO’s information and training. In the National Assembly, these interventions have helped legislators and staff to understand the problems and concerns of the NGO sector, and have exposed them to the international standards and best practices embodied in the sector’s policy positions. The same applies in the case of bureaucratic officials.

In the latter case, there is also an important added benefit, namely that NNNGO’s work with the non-profit sector helps administrators to carry out their work by improving mutual understanding and helping bring NGOs into compliance with the regulations. NNNGO provides information and training to its members on these issues, among other things highlighting the fact that getting registered is necessary for NGOs to open bank accounts and benefit from tax advantages. Senior public servants at such agencies as CAC can contribute to the training and get their message heard, and can also bring their learning from the workshops back to their organizations. For example, CAC reports having translated some of the NNNGO trainings into internal workshops to improve its own handling of NGOs. On the other hand, executive decisions to cut fees and agency budgets have complicated this work and challenged agencies such as CAC to deconcentrate and automate more of their functions.

Another result due at least in part to NNNGO’s work, is a greater sense of trust and collegiality between government administrators and the civic sector. On the NGO side, this encourages groups to come forward and regularize their status and structures. On the government side, this seems to have encouraged a sympathetic view of the sector, to the extent that senior officials have expressed opposition to such measures as the NGO Regulatory Commission Bill as unnecessary and unduly intrusive. Officials are also seeing the need to be more proactive in informing and reaching out to the NGOs.

QUESTION 3: HOW EFFECTIVE HAVE OTHER LEEP II PROJECT COMPONENTS – (I) CIVIC FREEDOM MONITOR AND (II) COUNTRY ASSESSMENTS OF THE CIVIL SOCIETY LEGAL ENVIRONMENT AND RESEARCH PAPERS – BEEN IN INCREASING THE KNOWLEDGE BASE FOR CIVIL SOCIETY LAW REFORM AT THE COUNTRY AND REGIONAL LEVEL?

ICNL and NNNGO provide vital information in their respective spheres. ICNL’s Civic Freedom Monitor, country assessments, and other publications provide information and analysis of a type and quality not easily available elsewhere.⁴ ICNL reports that local partners help to produce the periodic updates to the Monitor, and participate as well in producing the country assessments. This brings in necessary domestic perspectives while also helping build

⁴ A major ICNL publication on Nigeria, the Philanthropy Law Report (2017), was supported not by LEEP II but the Gates Foundation.

internal capacity to conduct such assessments and maintain the data independently. NNNGO and others in Nigeria and elsewhere in Africa use these publications and find them helpful.

As noted above, NNNGO members stated that the Network has provided important information that was not otherwise available to them. The information comes primarily from e-mail news updates and periodic conference calls. NNNGO posts some of its analyses and NGO resources, but it has not positioned itself as *the* key repository of information and research on all civic sector issues. One interviewee acknowledged that NNNGO produces high quality information, but admitted going elsewhere for more in-depth research related to the civic sector.

QUESTION 4: DOES THE PROJECT HAVE ANY GAPS OR ADDITIONAL AREAS THAT CAN BE INCORPORATED DURING THE REMAINING IMPLEMENTATION PERIOD, OR IN SIMILAR FUTURE PROGRAMS?

In this part, we first address matters of program focus and strategy in Nigeria – which means focusing on NNNGO. Later we discuss ICNL’s funding and technical support in Nigeria and the region.

As one would expect, NNNGO member organizations in interviews expressed their wish for more NNNGO programming, outreach, events such as meetings, and information. In particular, they advise NNNGO to put more effort into raising awareness in the wider civic community in Nigeria concerning its existence and what it has to offer. More training is desired, not only in the form of longer workshops that can delve deeper into certain topics, but also training on additional subject areas such as NGO corporate documentation, working with the UN, etc. Workshops should be held not just in Lagos but around the country. Nigerian NGOs also have a keen desire to meet and exchange views with counterparts in other countries, and to be linked up to international organizations. Some members would like NNNGO to play more of an umbrella role, seeking funding for the sector and entering sub-grants with specific NGOs.

Recommendations put forward by other interviewees focus more on NNNGO’s strategy going forward. These include bolstering its leadership and the strength of the sector through more aggressive outreach as well as fundraising from such sources as international donors. Outreach to policymakers and regulators could take the form of periodic (e.g. quarterly) meetings and phone calls, having NNNGO members write to officials to introduce the work of the network, publishing a civic sector “manifesto,” and compiling NGO complaints into written summaries. On the legislative front, such outreach could be aimed at alerting legislators to the sector’s vigilance and its policy positions, as well as educating legislators on international standards and best practices. This would help to discourage MPs from supporting unduly restrictive NGO legislation, and supply counter-arguments to well-disposed legislators. Such a proactive approach seems to be a logical next step in NNNGO’s efforts to ensure a supportive framework. It has been suggested that NNNGO should reach out in this way to the new government after the 2019 elections.

Another field where NNNGO needs to be proactive, according to some of the interviewees, is in coordinating the NGO sector’s political stance on governance and regulation. One aspect of this is to put forward a voluntary NGO code of conduct in order to reduce the perceived need for government control. Related to this, NNNGO could help the sector develop a framework

for information-sharing with government, thus helping allay concerns about undue foreign influence and illicit money flows. (This would not eliminate the need for NGO compliance with money-laundering regulation, but perhaps keep government demands within bounds.) The sector could be further strengthened in its dealings with government if NNNGO were able to bring more of the NGO sector on board to support objective, reasoned positions on policy matters. Examples such as the regulatory bill proposed by Senator Faseyi and the criticism generated by some NGOs in the Delta show that perceived partisanship by the NGOs can lead to political backlash – and harmful forms of regulation. In other words, the sector needs to be active in sustaining its legitimacy in the political sphere.

A further suggestion is for NNNGO to think critically about its value added and adapt its forward strategy accordingly. Some of its activities overlap with those of CIVICUS and Spaces for Change, and so it may need to consider where its comparative advantage lies. A secure, diversified funding base and more national profile (rather than its continuing emphasis on the Southwest) would strengthen NNNGO, shift more of its attention away from soliciting grants, and enable it to adapt to emerging trends and needs.

One forward-looking role suggested for NNNGO is to become more of an intellectual leader, research center, and repository of information on civil society issues. This would fit with meeting the need to understand and address major trends affecting the sector, as well as providing seed money for innovation. A problem in Nigeria, cited by several interviewees, is the tendency of NGOs to be vehicles for the leader's personality rather than sustainable, mission-driven institutions. A similar pattern is said to hold for networks, with the result that NGOs tend to join several of them – both to cover a range of issues and to have a kind of insurance in case certain networks disintegrate. NNNGO could bring universities into the network as intellectual resources, building on its current link to the University of Ibadan, from which it mainly draws interns. A next step would be to develop curricula, expert panels, and in-depth works of research and analysis. Last, NNNGO members are looking for support in dealing with state-level governments.

Turning to ICNL itself, its focus areas in the Africa region are evolving. Since money laundering has become such a high-profile issue, ICNL is working with ECNL to create a regional hub of expertise and support in this area. Consistent with this emphasis, NNNGO held several conferences and workshops dealing with the Nigerian government's implementation of relevant FATF standards, and with NGOs' need for information and guidance on compliance. ICNL is working to improve its monitoring of trends in the region so that it has, in effect, an early warning system. Also, it is deepening its support for NGOs' use of regional legal mechanisms under the African Charter on Human and Peoples' Rights.

NNNGO estimates that ICNL provides about 10%-15% of its overall funding – and nearly all of the network's resources for work on regulation – through the sub-grant mechanism. Other funds come from sources such as the European Union and the Commonwealth Foundation. NNNGO increasingly feels the need for overhead funding to ensure sufficient staff and resources to sustain itself. For now, it relies heavily on interns.

As for the Research Fellowship, it was suggested that it be made longer and that it provide for travel to other cities, in order to allow for more in-depth research. A further suggestion is to

set up an alumni network of African research fellows who can advise new fellows, among other things. Last, support for litigation would be useful in helping enforce civil society protections such as digital expression rights.

QUESTION 5: WHAT ARE THE PROJECT'S MOST IMPORTANT ACHIEVEMENTS AND LESSONS LEARNED THAT CAN INFORM FUTURE PROGRAMS DEALING WITH SIMILAR OBJECTIVES?

LEEP II can claim several notable achievements in Nigeria. First and most obviously, the efforts of ICNL and NNNGO played a key role in halting legislative proposals that would have reduced civic space by restricting free expression or by bringing NGOs under much more stringent government control. Second, the project has helped to establish international legal standards and global precedents of good civic sector practice as important benchmarks for the development of Nigeria's NGO regulatory framework. These standards have become more familiar to policymakers, NGOs, and the general public as touchstones of good outcomes in Nigeria. Third, LEEP II and ICNL have built NNNGO's capacity to the point where it has an increasingly firm grasp of the technical issues as well as a growing ability to mobilize the civic sector as policy issues arise and to ensure that the sector sustains an active vigilance in this area. Fourth, ICNL and NNNGO have filled an important knowledge gap. The NGO sector appears to have much greater awareness of policy issues and international legal standards in this area, and receives regular updates on developments. Regulators and policymakers also seem better informed, with some – notably CAC – seeking further input from ICNL and NNNGO as well as setting up internal training workshops.

Several lessons learned are worth mentioning. First, the civic sector in Nigeria has an appetite for more training and exchange, especially in-person events in which they can talk with peers from Nigeria and abroad. In particular, such sessions would reach a wider sector audience more effectively if they could be conducted more frequently in venues outside of Lagos. There are no doubt logistical and budgetary reasons for the limitations here, but there does seem to be pent-up demand, hence the prospect that increased funding for a wider range of events would pay dividends.

Second, more proactive efforts to head off adverse legislation are warranted. As mentioned, NNNGO has made important strides in informing and building relationships with the public sector, mediating state-civic relations, strengthening mutual understanding, and monitoring policy initiatives. These efforts are worth deepening. Another element that would add significantly here is strengthening the NGO sector's self-regulation, through voluntary standards and outreach to enhance the sector's legitimacy as well as government's trust in it.

Last, careful consideration should be given to NNNGO's institutional development. It is often observed by Nigerians that NGOs have a tendency to serve as vehicles for the founder's personality, and that they tend to fail when leadership changes. This kind of problem arises with organizations everywhere as they mature. In NNNGO's case, there are issues of both strategic focus and leadership transition to be addressed. These matters are relevant to the current evaluation because LEEP II and ICNL have invested in NNNGO as the Nigerian partner. The partnership has been a successful one, but these organizational issues will need to be addressed for NNNGO to continue being such a partner (if this is in prospect) or to sustain its

momentum beyond LEEP II. The leadership transition issue is a straightforward one of cultivating a second tier of senior staff in the organization. Strategic focus means defining NNNGO's comparative advantage going forward, especially as other networks and centers of non-profit support emerge. One suggestion is that NNNGO should strengthen its research and information dimension, and perhaps deepen its university ties, with the aim of becoming a true intellectual leader on non-profit sector issues in Nigeria.