Evolving anti-corruption programming amid COVID-19

This Learning Brief aims to share lessons from the UK Foreign, Commonwealth and Development Office (FCDO)-funded Anti-corruption in Nigeria (ACORN) programme. It draws on the efforts of organisations that work in this area, in adapting their strategies in the face of the COVID-19 pandemic.

Itad is providing bespoke support to ACORN to develop tailored skills, tools and systems to support their work. With ACORN coming to terms with the emerging crisis around COVID-19 and the implications for programming and for issues of anti-corruption, this Learning Brief has been prepared to share some insights on how the programme has adapted to address emerging challenges of the COVID-19 pandemic.

1. Overview: The Anti-corruption in Nigeria (ACORN) programme

The ACORN programme is designed to support Nigeria's efforts in tackling corruption by reducing public acceptance and improving enforcement strengths that will increasingly disapprove of and take action against corrupt practices. A key focus of the programme is helping organisations working on the programme to develop their core adaptative capacities in understanding and shifting the power dynamics and incentives that drive corruption and entrench vested interests.

The support ACORN provides falls into the following three inter-locking dimensions, each of which addresses a key challenge facing governance reformers and change agents. The first two dimensions require ACORN interventions to build capacity both on the demand and supply side. On the demand side, with citizens, youths and related public platforms for effective engagement that promotes attitudinal and behavioural changes leading to individual and collective actions; and on the supply side with enforcement agencies for a more accountable and transparent management of recovered stolen assets. The third dimension ensures that partners understand governance challenges and opportunities (see below for the ACORN programme model).

The three dimensions of ACORN's programme

	Stronger sanctions regime	Improve capacity of enforcement agencies to detect, investigate and prosecute those who break the rules and to recover stolen assets.
	Supportive society and social norms	Strengthen citizens' capability to resist and act on corruption. Strengthen capability of youth and other marginalised groups to participate in the fight against corruption.
	Results, evidence, coordination & communication	Update evidence on corruption to stimulate public discourse and ensure the continued relevance of programme coherence and effectiveness of UK support by coordinating HMG anti-corruption interventions.

2. Shaping ACORN's interventions for a faster response

The COVID-19 crisis has unfolded into an unprecedented public health and economic crisis. The sudden reduction in economic activity has put severe stress on businesses and on employment, requiring swift and strong government actions. The government of Nigeria has put in place a range of immediate economic policy actions to avoid or mitigate a massive recession, which could have irreparable consequences for citizens, labour markets and the corporate sector.

ACORN's implementing actors are playing an important role to ensure the "convergence" of interests, and, by extension, better services, an improved environment for business and investment, improved performance on security, which ultimately creates the environment for inclusive growth and poverty reduction. Here are a few examples of how the ACORN programme has been adapted to respond to the COVID-19 pandemic.

2.1 Rethinking accountability

Given the lingering suspicions and issues of isolation and distrust among individuals and between individuals and those in power, concerns over how, where and when recovered public funds are disbursed dominate the day-to-day reporting practices in development programmes. The COVID-19 crisis has provided opportunity for ACORN to think in a longer-term way about the impacts the pandemic might have on accountability, engagement and conceptions of community. A main focus of the programme has been to rethink accountability in a way that ensures that public integrity is not compromised in the management of government economic stimulus packages, and that these, in turn, produce the intended benefits.

First, ANEEJ and its MANTRA partners issued a press statement on 29 March 2020 calling on the President to direct the National Cash Transfer Office to commence payment to poor Nigerians enrolled in the nation's social protection register. This was a paradigm shift from allocating recovered (looted) funds for infrastructural development projects to palliatives for COVID-19. Information from the Ministry of Humanitarian Affairs, Disaster Management and Social

Development suggests that there was an increase in the number of conditional cash transfer (CCT) beneficiaries from 2.6 million to 3.6 million poor Nigerians.

ACORN's implementing actors put in place measures to limit bribery and corruption risks by monitoring the implementation of the recovered Abacha loot allocated for COVID-19 response. A Field Spot Check Report by ANEEJ covering the period from January to April 2020 was published and used to progressively contribute to strengthening the grievance mechanism of the CCT Programme and the global discourse on asset recovery guidelines and management. ANEEJ has also commenced update for the MANTRA session at the 19th International Anti-Corruption Conference (IACC), focusing on the COVID-19 pandemic and related corruption consequences. The conference will be held between 30 November 5 December.

In order to avoid the risk of fuelling corruption during the COVID-19 crisis, ACORN implementing actors have stimulated governments at both federal and sub-national level to support efforts such as monitoring public service delivery in the health sector, ensuring transparent procurement processes and management of health funds, as well as undertaking other targeted integrity efforts. UNODC galvanized civil society organisations around a common position paper to be presented at the 2021 United Nations General Assembly Special Session (UNGASS) on corruption.

Box 1. ACORN's sub-projects

Institutional Strengthening Facility (ISF) builds and supports enforcement agencies' capacity and ability to detect, investigate, prosecute and convict those who break the rules, and recover fraudulent assets. ISF is implemented by **Adam Smith International**.

Monitoring Asset Recovery in Nigeria through Transparency and Accountability (MANTRA) seeks to strengthen the capacity of CSOs and citizens to monitor the use of repatriated loot, embark on advocacy to improve the policy, legislative and institutional framework for the recovery and management of looted assets in Nigeria and mobilise collective action in demanding a cleaner society. MANTRA is implemented by **Africa Network for Environment and Economic Justice (ANEEJ).**

Strengthening Citizens Resistance against Prevalence of Corruption (SCRAP-C) aims to influence and interrogate the social norms and attitudes that help corruption thrive in Nigeria with a view to effecting social change. It will focus on social marketing to create an environment that discourages corruption, civil society educational campaigns on corruption, and citizen engagement initiatives that build public demand for anti-corruption. SCRAP-C is implemented by **ActionAid Nigeria**.

Socio-Economic Rights and Accountability Project (SERAP) focuses on analysing laws, institutions and practices facilitating corruption and contributing to the violations of economic and social rights. It also undertakes publicity, lobbying, grassroot mobilisation and campaigns to demand accountability from government and challenges violations of economic and social rights in relation to anti-corruption obligations

United Nations Office on Drugs and Crime (UNODC) is collaborating with the National Bureau of Statistics (NBS), to update National Household Surveys on Corruption in Nigeria; an update was done in 2019.

2.2   Decentralising feedback loops and monitoring efforts

ACORN's implementing actors have worked to ensure responsiveness in the programme by incorporating other actors in its monitoring efforts, including project partner NGOs and the media. This has been critical, both for better understanding community priorities and for supporting community ownership of initiatives. As part of the decentralisation of monitoring functions, open feedback and communications channels have been created to enhance exchange of information about opportunities and challenges between the different levels of implementation.

In its SCRAP-C project, ActionAid established an integrated monitoring system that included trackers for activity, participation and adherence. It also used participatory tools to understand how participants perceived and responded to the government's COVID-19 response such as palliatives, establishment of isolation centres and the National Social Investment Programme interventions such as the Home-Grown School Feeding Programme (HGSFP). The monitoring system uses varied toolboxes, including rapid assessments and investigative reporting, to collect real-time data and establish short-term feedback loops.

To enable the effective uptake of evidence generated through feedback loops, ActionAid held regular meetings with project partners, discussed data challenges and made collective decisions on how to advance the project. User-friendly and concise presentations of data facilitated this process. Working in tandem with government partners was also fundamental to enabling the methodological flexibility that characterized this programme. Leveraging on media capital, this innovation resulted in equitable allocation, disbursement and receipts of government's palliatives, funds and donations from private sector and donor community with a bias towards women, girls and persons living with disabilities.

The Socio-Economic Rights and Accountability Project (SERAP), on the other hand, intensified its media advocacy by leveraging on its well-established relationship with the media. From the first reported case of the pandemic till date, SERAP has sent out over 60 public media statements including 45 Freedom of Information (FOI) requests asking the governments at both Federal and state levels to provide information on how they have managed COVID-19 funds and palliatives. These efforts have led to the implementation of new policy directions and regulations in monitoring COVID-19 funds by the governments as well as improving their coordinating patterns. For instance, some government ministries, departments and agencies have started publishing procurement data on the Bureau of Public Procurement's NOPOCO – an open contracting procurement portal. NOPOCO is aimed at opening up public procurement in Nigeria through increased disclosure of procurement information.

2.3   Reconfiguring learning

ACORN's implementing actors have consciously examined the demands and requirements of learning amid the COVID-19 crisis to guide the chosen configuration. From a demand-led perspective, various forms of knowledge-sharing have been tweaked to include diverse channels that capture the varied ways each organisation gathers, processes and communicates information. These processes have been characterised by trust and safety, regular open communication and participation at all levels, all of which come with costs in terms of time and money. For instance, ActionAid hosted a webinar on adapting Monitoring and Evaluation (M&E) during and post-COVID-19 in Nigeria. The webinar explored several topics in the context of COVID-19, including adapting implementation strategies, data collection methodologies and tools, as well as how to ensure accountability and take value for money considerations on board in M&E activities.

The United Nations Office on Drugs and Crime (UNODC) created two platforms: (1) a multi-stakeholder platform for the identification and management of corruption and fraud risks in COVID-19 related procurement; and (2) a platform of exchange between the providers of social protection

programmes (in particular cash transfers) such as the United Nations International Children's Fund, the International Labour Organization, the World Food Programme and the World Bank, and those involved ensuring the transparent and accountable disposal of the Abacha's loot (i.e. MANTRA).

2.4 Creating virtual communities and networks

The COVID-19 pandemic is putting pressure on governments and development agencies to deliver governance and services in the age of social distancing. Processes that were once subject to physical interactions – be it political conversations or information dissemination considerations – are increasingly migrating to the digital space. From an adaptive programming standpoint, ACORN's implementing actors entrenched certain pathways that will shape this ever-evolving relationship under extraordinarily compressed timelines by altering communication methods, teaching techniques and monitoring formats to suit the digital space. These changes have been driven by adopting digital tools to carry out work plans.

To compensate for in-person experience, video conferencing platforms, for instance, have emerged as the go-to technology for UNODC to deliver its work plans, except activities that are not affected by COVID-19 such as the production of a short film on the main findings of the corruption survey, or carrying out further research, for example on gender and corruption analysis. SERAP strategically adapted its advocacy on anti-corruption onto social media by posting findings of its anti-corruption social norms survey report. The direct interaction and engagement that social media platforms provide have been incredibly useful for many conversations on anti-corruption catalysed by ACORN's implementing agencies. Recently, SERAP engaged a social media advocacy consultant to generate and disseminate relevant content that will promote discourse among citizens around social norms that foster corruption and related behaviours.

Indeed, this pandemic has provided opportunity for ACORN's implementing actors to promote and make use of digital platforms, like Twitter and Facebook, to allow and encourage Nigerian citizens to speak out about corruption and the socio-economic effect of the pandemic and how it is being managed, which, for all practical purposes, play the role of both traditional media and the discussion rooms of yore that shaped public opinion in the past. In April 2020, the Senior Special Assistant to the President on Digital and New Media participating in a Twitter conference used the MANTRA first monitoring report to stimulate public discourse around the utilisation of the recovered Abacha $322.5 million disbursement in Nigeria.

ActionAid's online series of campaigns against corruption has reawakened the consciousness of its target population to share opinions and promote solidarity in the time of COVID-19, especially with persons living with disabilities whose vulnerabilities have been heightened by this pandemic. The series also targets young people with practical advice on how to stay safe and well during the pandemic.

Amidst the operational and financial challenges of COVID-19, ACORN's implementing actors are committed to protecting key stakeholders, while delivering vital interventions. Some of these organisations are letting their staff work from home across different regions, while others have implemented measures to protect their frontline staff.

3. What we learned: lessons for anti-corruption implementing actors

ACORN's implementing actors found that the adaptation of their programming in response to the COVID-19 outbreak yielded important insights into the dynamics and cadences of how they work. As well as helping them enormously, these organisations appreciated the willingness and flexibility of the donor, FCDO, who allowed them to tailor their approaches to emerging needs, rather than imposing 'blueprint' solutions. Some of the key emergent lessons are:

Having shared understanding of adaptive programming

For a programme to respond and adapt effectively in a complex environment, triggered by outbreaks such as COVID-19, it is crucial that all actors – donor, implementing organisations, local partners – understand that solutions to navigate this complexity need to be based on on-going strategic political economy and context analysis that is focused on locally-defined problems and adaptive planning processes informed by learning by doing.

Engaging the community to manage adaptability

One of the ultimate objectives of being adaptive is to deliver change as well as real solutions to real problems, thus a learning/reflecting space for communities/beneficiaries needs to be created to maximise the positive impact of programmes. By doing so, communities can take part in defining their own immediate needs, finding ways to address them and measuring their own success. Such an approach allows implementing actors to respond effectively to local challenges by empowering people and promoting sustainability, while building trust at the same time.

Striking the right balance between accountability and learning

Moving beyond monitoring and evaluation for accountability purposes and creating spaces to learn as part of the adaptive process is enormously important, and allows for real-time feedback, ongoing adaptation and improvement. Such an approach should be implemented to foster a reflective culture and inform intentional change. Providing data in real time complements the innovation process and helps to create a solid foundation of reliable information with which to make future decisions.

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