

UNDEF



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EVALUATION REPORT



UDF-NIR-08-233: Nigeria Procurement Monitoring Project

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Authors

This report was written by Phillip Rawkins and Sanusi Nurain Olalade. Landis MacKellar was responsible for quality assurance with the support of Aurélie Ferreira, Evaluation Manager. Eric Tourrés was Project Director at Transtec.

Disclaimer

The views expressed in this report are those of the Evaluators. They do not represent those of UNDEF or of any of the institutions referred to in the report.

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I. Executive Summary

i. Project Data

This report is the evaluation of the project entitled “Nigeria Procurement Monitoring Project”, implemented by the Public and Private Development Centre Ltd (PPDC), based in Abuja. Project implementation began on 13 October 2009 and was completed on 30 April, 2012 (31 months), including a 6-month extension. The project benefited from an UNDEF grant of \$325,000, with a project budget of \$300,000, plus an UNDEF monitoring and evaluation component of \$25,000.

The project was undertaken in association with the National Procurement Watch Platform (NPWP), a civil society umbrella group, closely associated with PPDC and also based in Abuja, but with member organizations throughout the country. While NPWP was designated as an “implementing partner”, PPDC maintained full responsibility for managing the project.

Abuse of power through corruption of public officials, including providers of basic services, is widely recognized as endemic at all levels in Nigeria. The project’s - and the grantee’s - focus on monitoring public procurement stemmed from a recognition of its centrality to the broader problems of corruption and government accountability.

The project’s overall objective was: *to increase the effectiveness of procurement observation and monitoring by non-state actors pursuant to the Public Procurement Act 2007 in Nigeria within two years.* The provisions of the Act allowed for monitoring of the procurement process by accredited civil society observers. Hence, project activities focused on core dimensions of the capacity gap holding back Nigerian civil society from playing an active and effective role in this regard. The project was built on a thorough analysis of the current situation regarding government procurement and mechanisms for monitoring and reporting on the process.

ii. Evaluation Findings

Relevance:

The Executive and political class in Nigeria is, at best, ambivalent about political reform aimed at tackling corruption. For this reason, efforts to address the problem which focus on the institutional (or “top-down”) dimension of government accountability and transparency alone are likely to have very limited success. Hence, the value of efforts to move beyond the “supply side” and focus on nurturing public demand for improved governance. In this context, the initiative to follow up on the adoption of the Public Procurement Act (PPA) of 2007 by strengthening the capacity of civil society organizations to monitor public procurement and opening the space for their engagement in this work takes on particular relevance.

As the World Bank has pointed out, procurement often appears as something technical and arcane, and as remote and beyond the understanding of most citizens. Effective monitoring of procurement seeks to bridge this gap in knowledge and understanding. However, to do so requires familiarity with the legal provisions of the PPA and of a complex set of technical procedures. To be credible, monitoring reports, and analysis built on the reports, must demonstrate an appreciation of both context and content, understanding the need for the essential documents required to prepare full and

accurate reports. This was the driver of PPDC in designing and implementing the UNDEF Project.

Effectiveness:

PPDC's technical knowledge and organizational skills provided a solid foundation for project effectiveness, as did its credibility with both civil society organizations and government regulatory bodies. The place of the grantee at the centre of a network of like-minded organizations, bound together by a common interest and shared experience, also ensured a close link between the needs and capacity limitations of civil society concerned with procurement monitoring and the focus of the activities undertaken.

With one or two partial exceptions, the long list of project activities was completed as planned, and, taken together, they represented an important step towards the achievement of specified results. Particularly important was the design, launch and operation of an internet Portal to facilitate the uploading of completed monitoring reports and the sharing of information. In preparation for the design of the Portal, the project also supported the peer review and updating of the existing monitoring checklist and reporting template. The development of the Portal is regarded as an important achievement, not only by civil society, but also by government regulatory bodies and international donors, including the World Bank, UNDP and PACT Nigeria (supported by USAID).

The publication of two carefully-researched annual assessment reports on the state of public procurement and the level of stakeholder knowledge of the requirements of the PPA proved to be an effective mechanism for drawing attention to the centrality of public procurement to the broader issue of integrity in governance in Nigeria. The second report also noted areas where improvements had been made over the previous twelve months. The development of new tools for training of trainers in procurement monitoring and the training of 33 monitors were also valuable. Patient and respectful dialogue and cooperation between PPDC and its allies in the National procurement Watch Platform and the Bureau of Public procurement (BPP) also paid dividends in the shape of agreement by the Bureau to issue a directive to government ministries, departments and agencies to collaborate fully with civil society monitors. BPP also agreed to do more to make information on government procurement plans available in advance.

Efforts to work closely with the legislature and build the awareness of members of relevant committees of key issues concerning government procurement processes began well, with the Committee on Public Procurement of the House of Representatives demonstrating willingness to follow up on concrete problems identified in meetings with PPDC and its allies. However, the 2011 Parliamentary Elections brought about a wholesale change in the membership of both houses of the National Assembly. The leading champions of reform in regard to public procurement were defeated, and there was no longer an interest among elected members in working closely with PPDC, although a positive working relationship was established with the parliamentary secretariat.

Efficiency:

A review of the project budget indicates a well-balanced deployment of resources in support of project objectives. Funds were managed carefully and all actual costs were

in line with those projected in the initial budget. In a few cases, notably the capacity development (training of-trainers) workshop, activities were under-budgeted. This was the result of an overly-ambitious agenda, given the resources available.

Impact:

The Development Objective for the project was modest and realistic in the scope of its ambition, and it may be concluded that the project had an impact on the problem, as stated. The Nigeria Project Monitoring Project took forward the effort to enhance transparency in government decision-making. At the same time, it also demonstrated what could be done through practical action by civil society groups in building up and focusing the demand for good governance.

Sustainability:

One of the difficulties to be confronted in considering work such as that undertaken by PPDC and its allies concerns the constant need for external resources to support the continuation of activities. Given the need to maintain independence in order to ensure the credibility of its activities, accepting funding from the government is not an option. Hence, unless public or private donors are prepared to support an endowment or trust fund, the continuing struggle to survive on the basis of project funding will continue.

The project succeeded in putting in place a system for guiding and recording monitoring reporting, which has been widely accepted and endorsed. It continues to operate. Although some of the longer-established NGOs are able to support some level of monitoring activity from their own resources, inevitably, the overall level of activity will decline without additional dedicated funding. Further, there is regular turnover in CSO ranks, and the level of knowledge required to be an effective monitor is significant. Therefore, there is a need for continuous training simply to maintain current numbers.

UNDEF Added Value:

The UNDEF project provided an injection of funding at a critical time in the development of the initiative to facilitate civil society monitoring of public procurement. The project contributed significantly to the building and acceptance of a system to provide for a consistent methodology for both monitoring and reporting, which proved acceptable to all parties. The level of financial support provided by UNDEF represented by far the largest contribution to date to PPDC and enabled it to invest the necessary resources in some key areas of activity, which have served to enhance the credibility of the civil society role in this sphere.

iii. Conclusions

- The Nigeria Procurement Monitoring Project represented an effective use of UNDEF funds. It contributed in a modest but positive way to building integrity and transparency in governance, while also strengthening the capacity of civil society to make a difference in ensuring that the awarding of public contracts is done in accordance with the law.

- The close working relationship, based on mutual trust and shared experience, between PPDC and its peers in the civil society governance and anti-

corruption network represented a clear value added. This certainly contributed to enhance the project credibility with government and international donor stakeholders, as well as Nigerian civil society.

- Only 33 monitors were trained directly through the project (others were trained indirectly by those who had completed the training-of-trainers course). This could be regarded as disappointed, but it is to be recorded that it was *not* a training project, and what was more important was the contribution to developing and testing the curriculum and methodology for training of trainers. But still, a large unmet need for the training of large numbers of additional monitors, capable of meeting accreditation standards, as well as for strengthening the capacity of those who have already been trained remain.

- The Annual Assessment Reports proved to be an excellent tool for drawing attention to the depth of the problem to be addressed in public procurement, while also acknowledging improvements where they had been made. At the same time, the Evaluation identified weaknesses in the research which provided the basis for the reports, pointing to the need for PPDC to draw on social science expertise in survey design and data analysis to remedy the deficiencies.

- The project budget review demonstrates that UNDEF funds were deployed with care in support of achieving project results. A few key activities were under-budgeted, reflecting an over-ambitious agenda.

- Sustainability is problematic, given the absence of domestic sources of finance outside government, and the paramount need for PPDC to retain its independence. However, a number of steps have been taken to ensure that core activities supported by UNDEF will continue beyond the project.

iv. Recommendations

It is recommended that:

- Considering the frequent difficulty experienced by international donors in identifying projects which might make a difference in countries with high levels of corruption, UNDEF gives particular attention to the viability of providing support to other, well-prepared, projects concerned with civil society monitoring of public procurement.

- UNDEF considers providing a further grant to support its work, should a well-planned proposal be received.

- **PPDC** continues with the approach to focus its efforts to identify and work in priority sectors and strengthens its research efforts which provide the foundation to its annual assessment reports.

- PPDC gives careful thought to focusing resources in future projects on major activities, critical to the achievement of core results, ensuring that they receive the funds required to complete the work and reinforce short-term outputs, particularly in the sphere of training.

- Particularly given its experience in working with the legislature, PPDC gives closer attention to risk assessment and risk mitigation strategies at the time of project design and specification of results.

II. Introduction and development context

i. The Project and Evaluation Objectives

This report is the evaluation of the project entitled “Nigeria Procurement Monitoring Project”, implemented by the Public and Private Development Centre Ltd (PPDC), based in Abuja. Project implementation began on 13 October 2009 and was completed on 30 April, 2012 (31 months), including a 6-month no-cost extension). The project benefited from an UNDEF grant of \$350,000, with a project budget of \$325,000, plus an UNDEF monitoring and evaluation component of \$25,000.

The project was undertaken in association with the National Procurement Watch Platform (NPWP), a civil society umbrella group closely associated with PPDC and also based in Abuja, but with member organizations throughout the country. While NPWP was designated as an “implementing partner,” PPDC maintained full responsibility for managing the project.

PPDC describes itself as “a Nigeria citizenship sector organization.” It was formerly known as “Public and Private Right (*sic*) Watch,” established in 2001. Its work focuses on anti-corruption, good governance and citizen participation in addressing corruption.¹ According to the PPDC web-site, the UNDEF-funded project built on its earlier work, undertaken through the USAID-supported Procurement Watch Program, implemented through the NGO PACT Nigeria. It is a small organization, with a secretariat of six permanent staff occupying modest premises.

The project’s - and the grantee’s - focus on monitoring public procurement stemmed from a recognition of its centrality to the broader problems of corruption and government accountability. The project was built on a thorough analysis of the current situation regarding government procurement and mechanisms for monitoring and reporting on the process. Its overall objective was:

To increase the effectiveness of procurement observation and monitoring by non-state actors pursuant to the Public Procurement Act 2007 in Nigeria within two years.

Its four subordinate objectives focused on core elements of the capacity gap holding back Nigerian civil society from playing an active and effective role in this regard. The four objectives, as stated in the Final report, were:

- a. To build the capacity of non-state actors on procurement observation and monitoring;
- b. To enlighten the federal legislature on procurement oversight and monitoring;

¹ <http://www.procurementmonitor.org/index.php?page=About>

- c. To improve access, analyses and sharing of procurement information; and,
- d. To strengthen advocacy for improved transparency and accountability in the procurement process.

ii. Evaluation methodology

The evaluation was conducted by two experts, one international and one national, under the terms of a framework agreement between UNDEF and Transtec. The methodology of the evaluation is set out in the Operational Manual governing this framework agreement, as well as in the evaluation Launch Note. A set of project documents was provided to the evaluators in the weeks preceding the field mission. On that basis, they prepared the Launch Note (UDF-NIR-08-233) setting out key issues and particular areas of focus to be considered during the field mission, which took place from March 18 - 22, 2013. Additional documents drawn on in the Evaluation were obtained from the grantee during the field mission and from other relevant sources.

All meetings took place in Abuja, the national capital, which is the principal location for the procurement process for all major federal government contracts. One telephone interview was held with a project participant based in Ibadan. Several meetings were held with senior staff of PPDC. In addition, one extended meeting was held with a larger staff group to review project activities and the project budget in detail. A long interview was also conducted with the chair of the National Procurement Watch Platform.

In addition, individual and small group interviews took place with a series of project participants and stakeholders. The latter group included UNDP, the World Bank's senior procurement specialist, the USAID-supported PACT, and the Open Society Institute of West Africa (OSIWA), Nigeria Branch. Others interviewed included a former Chair of the House of Representatives' Committee of the Legislature on Public Procurement, and senior officials from the government's Bureau on Public Procurement and the Economic and Financial Crimes Commission. Among those from civil society interviewed were several who are active as public procurement monitors/observers and who had been trained through the project.

iii. Development context

Corruption in Nigeria undermines democratic institutions, retards economic development and contributes to government instability. Corruption attacks the foundation of democratic institutions by distorting electoral processes, perverting the rule of law, and creating bureaucratic quagmires whose only reason for existence is the soliciting of bribes.²

Abuse of power through corruption of public officials, including providers of basic services, is widely recognized as endemic at all levels in Nigeria. A Human Rights Watch report in 2012 commented that graft "has turned public service for many into a

² Independent Corrupt Practices and Other Related Offences Commission, ICPC (Nigeria), introductory statement on web-site, home page: <http://icpc.gov.ng/>

kind of criminal enterprise.”³ While there is broad public support for the efforts of the country’s anti-corruption agencies, financed, in part, by international donors, the campaign to address corruption has lost momentum in recent years, and members of the political and economic elite have proven proficient in using the courts to mount effective defences against corruption charges.⁴

A side-effect of system-wide corruption has been the distortion of state priorities and the diversion of public resources from support to basic services. Hence, despite its oil wealth, which gives it the status of a middle-income country, Nigeria’s performance in terms of reducing poverty and improving human development achievements in recent decades has been poor. It is ranked at 142 of 169 countries on the Human Development Index, placing it in the “low human development” category, and at around the median for Sub-Saharan Africa. It is estimated that more than 53 per cent of the population survives on an income of \$2 per day. Levels of educational attainment are low, with school enrolment at 50 per cent of the age-group, an adult literacy rate of 60 per cent, and government expenditures on education at only 0.9 per cent of GDP.⁵

Oil and gas revenues provide 40 per cent of GDP, 95 per cent of foreign exchange earnings and 65 per cent of government revenues.⁶ Control of these revenues and their distribution has led to the emergence of a strongly-entrenched political elite, and “state capture” by those who stand to gain from a continuation of the status quo. The beneficiaries of this state of affairs have little interest in reforms which would dilute their power and influence. Further, public policy in Nigeria tends to be driven by informal interest group lobbying, and not by formalized consultation and public debate.⁷ Power in the political system is concentrated in the hands of the President, who, along with the state governors, the military and other senior officials, controls an enormous, country-wide patronage network. The legislature is weak and the independence of the judiciary somewhat compromised.

Civil society remains weak and lacking in both financial resources and a strong membership base, though it is growing to a modest degree in importance as a political force.⁸ The mass media, for the most part, are independent and active in reporting on public affairs. Further, the awareness of corruption, and an understanding that it is a crime, and not a given in public life, has emerged among citizens, as a result of growing access to the internet and mobile phones.⁹

Given its resource wealth, Nigeria is unlikely to be swayed by donor pressures to accept international standards for accountability and transparency in governance processes. However, with an economy largely dependent on the export of oil and gas, in order to maintain the flow of revenues, the country does need to look to its reputation in the eyes of the world. More specifically, it must do what is necessary to continue to secure foreign investment and maintain positive relations with major international

³ As quoted in report in *Financial Times*, Section on Investing in Nigeria 2012, Tolu Ogunlesi, “Corruption: system is rife with abuse”, November 27, 2012: <http://www.ft.com/cms/s/0/ceca4c64-3493-11e2-8b86-00144feabdc0.html#axzz2QYcY3QV1>

⁴ See: Bertelsmann Stiftung Transformation Index, *BTI 2012: Nigeria Country Report*, p.5.

⁵ UNDP, *Human Development Indicators: Nigeria, Country Profile 2011*; and, *BTI 2012*.

⁶ From sources quoted in: Inge Amundsen, *Good Governance in Nigeria: A Study in Political Economy and Donor Support*, NORAD, August 2010, p. ix.

⁷ See: Pat Utomi, Alex Duncan and Gareth Williams, “Nigeria: the Political Economy of Reform: Strengthening the Incentives for Economic Growth”, *The Policy Practice*, Updated Version, October 2007.

⁸ See: Inge Amundsen, “Who Rules Nigeria?” *Norwegian Peace-Building Research Centre (NOREF) Report*, November 2012. See also: Carl LeVan and Patrick Ukata, “Nigeria”, in *Countries at the Crossroads*, Freedom House, 2012; and, “Nigeria” *BTI 2012*, *Op. Cit.*

⁹ See: “Nigeria”, in *Countries at the Crossroads*, *Op. Cit.*; *Financial Times*, November 27, 2012, *Op. Cit.*

partners. For international companies considering investment in Nigeria, governance issues are increasingly of concern, particularly because of closer scrutiny of international transactions by regulators in the US and Western Europe.¹⁰ For these reasons, a combination of external and internal pressures has led to the grudging adoption and hesitant implementation of some reform measures.



Map of Nigeria

These have included the adoption of anti-corruption laws and establishment of monitoring and enforcement bodies. More recently, a Freedom of Information Law was adopted by the Federal Legislature (National Assembly). A further landmark of significance in the effort to defend the public sphere in Nigeria against corruption was the passage by the National Assembly in 2007 of a Public Procurement Act. The provisions of the Act were guided by the findings of the Country Procurement Assessment Report (CPAR), completed in 2000, and supported by the World Bank. The intention of the Act was “to introduce legal and regulatory reforms, as well as the harmonisation of standards and practices and to achieve transparency, competitiveness and value for money in public procurements.”¹¹

The adoption of the Act was a major step forward. However, as with other recent reforms intended to improve accountability, implementation of its provisions has proved to be problematic. The bodies empowered under the Act to monitor and provide oversight concerning public procurement have lacked the capacities and resources to play their part.¹² The UNDEF-funded project sought to address one aspect of this critical gap.

¹⁰ See: *Financial Times*, Op. Cit.

¹¹ From Section 4 of the Public procurement Act, as reported in PPDC, *Public Procurement Act 2007: A Simplified Version*, not dated, P.3.

¹² For a thorough review of the manipulation of the public contracting process and challenges to efforts at anti-corruption reform, see: Inge Amundsen, *Good Governance in Nigeria*, Op. Cit., particularly Section 2.3.3. On presidential politics and addressing corruption, see also Xan Rice, “President’s Mild Manner Adds to Sense of Drift”, *Financial Times*, Special Report on Investing in Nigeria, November 27, 2012: <http://www.ft.com/intl/cms/s/0/0e6510a4-33ca-11e2-9ce7-00144feabdc0.html#axzz2QYcY3QV1>

III. Project strategy

i. Project approach and strategy

PPDC Background and the Context of the UNDEF Project: PPDC has been active in supporting and facilitating the effective implementation of a transparent, fair and consistent public procurement process since the adoption of the Public Procurement Act (PPA) in 2007.¹³ At the time of the adoption of the Act, The organization was small, and, though recognized for its technical and professional competence, needed support in building up its structure and systems. It succeeded in obtaining a series of small grants from the PACT Nigeria USAID Advance program. This support, which began in 2008, was critical in enabling PPDC to strengthen its management capacities and take on programming work in line with its ambitions.

Its key role has been in building the enabling environment for civil society organizations to play an active role in putting into practice the provisions in the PPA concerning the monitoring of government procurement processes, as well as building their capacity to contribute in this way. With PACT support, it contributed to the establishment of the National Procurement Watch Platform, a civil society coalition. It is the Platform which takes the lead in advocacy activities, while PPDC plays a research, policy and capacity development role. It also operates as a hub for information sharing and exchange and acts as a bridge between civil society and other stakeholders, notably official bodies, but also including the private sector. Beyond this, it has also supported the Bureau for Public Procurement in establishing the mechanisms to govern and facilitate the monitoring of the procurement process.

The UNDEF-financed project provided support to PPDC in its efforts to reinforce and confirm its role in these respects. However, as the foregoing might suggest, the approach adopted and the results accomplished are best understood as building on, and continuing, earlier efforts.

The project combined technical work, focusing on improving the instruments for monitoring and documenting procurement practice, with training and accreditation of monitors and the building of cooperation within Nigerian civil society. Efforts were also made to enhance working relationships between civil society and official bodies. Underlying, and contributing to these aspects of the project was a program of research and documentation concerning the status of current initiatives to implement the PPA, highlighting key areas where further action was required.

Key activities included:

- The Mapping of Non-State Actors involved in procurement Observation;
- The Review of Existing Reporting Instruments (for procurement monitoring);
- Advocacy visits to the Federal Legislature;
- Design and Operation of an ICT Portal to support Procurement Monitoring;
- Support to an Expert Group engaged in the development of the Procurement Observation Handbook;
- Training of Trainers on “Procurement Watch” for selected CSOs and

¹³ The organization, founded in 2001, was formerly known as “Public and Private Right (*sic*) Watch”.

- professional associations;
- Systematic Assessment of the Extent of Implementation of the Public Procurement Act for two periods: 2007-2009 and 2010-2011;
- Capacity Development for Legislative Committee Members and staff.

Earlier projects had enabled PPDC, working in partnership with the National Procurement Watch Platform and its organizational members, to build an initial foundation for civil society engagement in the process of documenting the procurement process and the extent to which particular cases met the required standards as set out in the PPA. An initial guide for procurement monitoring had been developed, and a number of CSO activists, including representatives of professional associations, have been trained to use it. In addition, work had been done with the Bureau for Public Procurement to ensure consistency with its own work in documenting government procurement activities.

The UNDEF project, which was larger in terms of its budget and longer in duration than project funds provided by other donors, was intended to enhance the credibility and professionalism of CSO monitoring work by: strengthening the “critical mass” of active monitors; improving methods of documentation and reporting; building a national data-base of monitoring reports; and, preparing and publishing reports based on systematic analysis of information obtained from the data-base and surveys of government procurement stakeholders. There was also to be a focused effort to build closer cooperation with the legislature, encouraging its relevant committees to utilize their constitutionally-based powers to enhance legislative oversight activities regarding procurement.

Management arrangements:

The project was managed by the grantee alone, through a small program management committee. Throughout the project, PPDC worked closely with the National Procurement Watch Platform. In addition, an Advisory Board for the Portal was established. The Board included senior representatives from the government’s Bureau for Public Procurement and the World Bank, as well as from civil society.

ii. Logical framework

The chart is based on detailed information included in the project's results table and Final Report. A difficulty encountered in preparing the chart is that project documents list both a set of five outcomes, as well as four objectives. It is apparent to the Evaluation Team that the four objectives correspond to Medium-Term Impacts, and they have been used as such in the chart. Since activities are also organized in relation to the objectives in project reporting, the "outcomes" are left aside. Some activities contribute to more than one Medium-Term Impact, and, by necessity (with one exception), a decision has been made to relate activities to only one Medium-Term Impact in each case.

Project activities	Intended outputs/outcomes	Medium-term impacts	Long-term development objective
<p>Mapping of non-state actors in procurement observation</p> <p>Review of the existing reporting template and checklist for procurement monitoring</p> <p>Consultative meeting between CSOs and the Bureau of Public Procurement (BPP)</p>	<p>Mapping report is completed. Findings inform other project activities.</p> <p>Review of template and checklist completed and the documents are amended</p> <p>BPP publishes 1st set of hard copy procurement plans for all Ministries, Departments and Agencies, MDAs (10 2010) & On-line (2011)</p> <p>BPP directive to MDAs to invite CSOs for procurement monitoring; improved performance by MDAs; BPP invites CSOs trained through project to take part in review of standard bidding documents</p> <p>Improved version of Observation Handbook is widely disseminated and made available on-line; through wide access to training manual, improved capacity of civil society groups to engage with new procurement framework</p> <p>Several NGOs trained have successfully conducted training for other NGOs, while also becoming active advocates to ensure full compliance with procurement process;</p> <p>Some NGOs begin advocacy for adoption of procurement laws at</p>	<p>Capacity of non-state actors on procurement observation & monitoring is built</p>	<p><i>Increased Effectiveness of procurement observation and monitoring by non-state actors pursuant to the Public Procurement Act in Nigeria within 2 years</i></p>

<p>Meeting of consultants/experts to design and develop the procurement Observation Handbook</p> <p>Selection of NGOs to be trained & Delivery of TOT Workshop on procurement watch for CSOs & professional associations</p>	<p>state level; some states have begun process of adopting such laws</p> <p>Several of those trained have begun to file completed procurement checklists with the portal on-line</p> <p>PPDC has facilitated accreditation of all trained CSOs with BPP</p>		
<p>Advocacy visits to targeted legislative committees</p> <p>Delivery of one capacity building workshop for 35 legislative committee members & staff</p>	<p>Relationship formed between PPDC & National Assembly (NA)</p> <p>Ongoing contact with staff of NA</p> <p>Evidence of willingness by Committee on Public Procurement to intervene in procurement process where monitors report possible cases of violation of rules</p> <p>Workshop delivered, but most attendees are staff members (election campaign & not possible to reschedule); useful research findings on level of activity of NA on procurement</p> <p>NA staff agrees to work with PPDC on further research on procurement practice.</p>	<p>The legislature is enlightened on procurement oversight and monitoring</p>	
<p>Design and deployment of ICT Portal</p>	<p>Design is completed and portal becomes active;</p> <p>Increasing use made of portal by CSO monitors: 2010 (49 procurement reports) and 2011 (107 reports, of which 82 were completed).</p>	<p>There is measurable improvement in access to, and analysis and sharing of procurement information</p>	
<p>First & second assessment of levels of implementation of Public Procurement Act for (i) 2007-2009, & (ii) 2010-2011.</p> <p>Trained CSOs observe procurement processes in selected sectors</p>	<p>Two assessment reports completed and modest signs of improvement noted in second report. However, major issues identified where more substantial improvements are required.</p> <p>Several of those trained have begun monitoring work and have filed completed procurement checklists with the portal on-line</p>	<p>Strengthened advocacy for improved transparency and accountability in the procurement process</p>	

IV. Evaluation findings

This evaluation is based on a set of Evaluation Questions or EQs, designed to cover the Development Assistance Committee's (DAC) criteria: relevance, effectiveness, efficiency, impact, sustainability, and value added by UNDEF. The Evaluation Questions and related sub-questions are presented in Annex 1.

i. Relevance

“After years of scandal, Nigeria has struggled to restore public trust in the government and rid the public sector of persistent corruption. Nowhere is this more apparent than in the government procurement process, where vast sums of money – approximately 70 percent of government activity – exchange hands behind seemingly closed doors. Complicating matters, public service contracting is often highly technical, making it arcane and difficult for the average citizen to take advantage of recent laws allowing civil society organizations to observe all stages of the procurement process. As a result, citizens are often unable to provide the civic feedback necessary to ensure effective governance.”

From [World Bank Web-Site](#), News, “Nigeria: Citizen Monitors Prevent Corruption and Ensure Corruption Accountability in Energy Sector”.

With the absence of full-hearted commitment on the part of the Executive and members of the “political class” to implement reforms to address corruption, efforts to enhance the “supply side” (institutional dimension) of government accountability, taken alone, are likely to have only very limited success. In this context, the initiative to strengthen the “demand side” of accountability, by broadening and deepening the engagement of civil society organizations (CSOs) in monitoring the government contracting process, becomes particularly relevant.

The work by PPDC and the core members of the National Procurement Watch Platform in building a civil society capacity and commitment to monitoring public procurement had begun with the support of earlier projects, funded by PACT (USAID) and the World Bank. However, the UNDEF project provided the means to build on these foundations in some key areas where investment was very much needed. There was a high level of endorsement for the value of the UNDEF project by the full range of stakeholders interviewed for the Evaluation. All beneficiaries of the training offered through the project, as well as users of the Portal and other products of the project, were extremely positive about the relevance of the activities delivered to their needs.

The focus of project investment in the following areas responded to the need to further professionalize and strengthen the credibility of civil society monitoring: enhancing the quality of training methods; emphasizing training-of-trainers and encouraging successful trainees to organize “step-down” training workshops for other members of their parent organizations and broader networks; and, more effective reporting and analysis and communication of monitoring findings. As the World Bank has pointed out (see quoted statement above), procurement often appears as something remote and beyond the understanding of most citizens. Effective monitoring of procurement seeks to bridge this gap in knowledge and understanding. However, to do so requires

familiarity with the legal provisions of the Public Procurement Act (PPA), as well as a complex set of technical procedures. To be credible, monitoring reports, and analysis built on the reports, must demonstrate an appreciation of both context and content, understanding the key documentation required to prepare full and accurate reports. This was the driver of PPDC in designing and implementing the UNDEF Project.



Participants and Trainers at Capacity Development Workshop

Risk: The grantee did not identify risks to project results in the Project Document. However, it was very well-aware of the main threats to project effectiveness. The principal risk which was confronted was the possibility that the absence of commitment to anti-corruption at the level of Nigeria’s political leaders would result in the absence of a willingness to cooperate on the part of the Bureau for Public Procurement (BPP), the key regulatory body, the legislature and other official institutions.

It sought to mitigate this risk by continuing dialogue, and through offering a partnership in addressing some of the internal capacity development issues confronting BPP and others. By continuing to build its network, which included professional associations and the private sector and the mass media, as well as international donors, PPDC enhanced awareness of its work, as well as its professionalism. This also reduced the prospect of its being rejected, as did the demonstration, over time, of its preference for a constructive approach and the avoidance of partisanship in a highly-politicized environment.

One risk that perhaps was not fully taken into account by PPDC was the impact of an election campaign, and its results, on its efforts to cooperate with the legislature. The project suffered a significant setback as a result of the outcome of the April 2011 Federal Election, which brought about a dramatic change to the composition of the membership of both the Senate and the House of Representatives.¹⁴ Key partners, who had proved to be enthusiastic in working with PPDC, during 2010, were defeated. Their replacements, by contrast to their predecessors, had a negative view of

¹⁴ As a result of the April 2011 Elections, 72 of 109 Senators were defeated. In the case of the House of Representatives, 260 of 360 members were newly-elected. Source: “Lessons from Nigeria’s 2011 Elections”, Africa Briefing, no.81, [International Crisis Group](#), September 15, 2011.

continuing the partnership. As will be discussed below, to a degree, the project was able to compensate for this setback by building a relationship with the Parliamentary research team. The timing of the elections also conflicted with the project timetable. For budgetary reasons, it proved impossible to reschedule a major workshop intended for parliamentarians. As a result, a majority of those in attendance were researchers and administrators.

ii. Effectiveness

PPDC is a thoroughly professional organization, built on solid technical knowledge of its field of engagement. It is also the hub of broad network held together by common interest and shared experience, at least among its core members. These attributes assisted greatly in contributing to the effectiveness of the project.

Assessing the Project's Success in Achieving its Objectives: the first, and largest, set of outputs was intended to support the building of the capacity of non-state actors in procurement monitoring and observation. A difficulty which presents itself to the Evaluation Team in considering the value of these activities to the Medium-Term Impact Result derives from the fact that much of the core work of the project had been initiated under previous projects, funded by the PACT Nigeria USAID Advance Program, with in kind support from the World Bank Procurement Team in Abuja, and contributions in kind and cash from directors of PPDC and other members of the National Procurement Watch Platform as well as the critical support at the time of the Bureau for Public Procurement (BPP) www.bpp.gov.ng. These activities included: the training of civil society monitors; building cooperation with the Bureau for Public Procurement and the legislature; establishing a national network of civil society organizations committed to procurement monitoring and reporting; and producing and testing a template and checklist for reporting.

Observing a Bid Opening Process

Based on Observations Made by Participants in a Group Meeting with the Nigerian Society of Engineers

“When we attend a bid opening process as observers, we have no control over what goes on there. We are there to observe... It always looks as if everything is stage-managed, including the outcome. Yet, you can see that some MDAs (Ministries, Departments and Agencies) have a very thorough process, recognizing the need to share full information and documents with all present. But, in some cases, with too many participants present, it becomes chaotic, and is not managed properly... It becomes confused, and with so many bidders and so many documents, it may go on until after midnight (after a late morning start)... They have bid opening processes for all project announcements at the same time, lots 1-20, with 50 bidders for each contract! The hall becomes jammed with people and Monitors can just take what they can get, while officials become confused.”

However, interviews with the World Bank and PACT indicated the satisfaction of both organizations with regard to the focusing of the UNDEF project in building on earlier work and in avoiding duplication of effort. In fact, the World Bank procurement team advised PPDC in designing its proposal to UNDEF.

In order to provide a full appraisal of the degree to which PPDC succeeded in contributing to results beyond those accomplished earlier, it will be necessary to devote detailed attention to a review of a sub-set of project activities, beginning with the first three of those contributing to the capacity development result, noted above.

An initial survey of non-state actors involved in procurement observation was of value in setting a baseline for the project and in demonstrating the continuing, substantial need for training and technical support for CSOs and professional associations in procurement monitoring. It was determined that very few individuals or organizations completing the survey had the capacity to complete monitoring reports. It was also apparent that there was a limited appreciation of what was required to monitor the complete procurement process effectively.

Another of the findings of the survey concerned the limitations of the existing reporting template and procurement monitoring checklist, both of which had been developed under an earlier PACT-funded project by the National Procurement Watch Platform. Accordingly, major revisions to both tools were undertaken with a view to ensuring that monitors were able to complete full reports on the entire procurement process. A parallel concern was to develop a format suitable for entering reporting data on the internet portal, limiting the amount of text entry required, while also allowing for more robust analysis of the data.

Extensive consultations were carried out on the basis of draft revised versions of the checklist and template to ensure full buy-in and to take into account practical and substantive issues raised by key stakeholders. Those involved in consultations included the BPP, as well as a group of experts brought together in a workshop. A number of changes in both format and content resulted from inputs arising from the consultations.

A third activity was closely linked to the first two. It is described in the Project Document and the Logic Impact Model as “A Consultative Meeting between CSOs and the BPP.” In fact, it would be more accurately described as continuing dialogue leading up to a final consultative meeting, where agreement was finalized in resolving a number of issues which were critical to the overall effort to facilitate successful and effective monitoring.

Particularly important were the agreement by BPP to issue a directive to Ministries, Departments and Agencies (MDAs) to provide relevant information to accredited monitors, when requested, as well as giving at least one week’s notice of “bid opening” events. In addition, BPP agreed to publish annual procurement plans, including the dates when particular procurement processes were scheduled to begin. In turn, PPDC agreed to assist BPP by facilitating training seminars for Bureau staff members to ensure their ability to press MDAs on compliance with the provisions concerning transparency and access to information set out in the Public Procurement Act of 2007 (PPA).

All three activities were completed successfully, as planned. Beyond this, together, they contributed to the broader capacity development objective, as did the other activities intended to support the same overall result. The first of these concerned the preparation and publication of the Procurement Observation Handbook, completed in 2011. This work built on previous efforts, supported by PACT Nigeria (USAID) which led to the completion of the “User Guide to the Public Procurement Observation Checklist” (2010). The full name of the Handbook is “Public Procurement Monitoring: a Facilitator’s Manual”.

While covering the same ground as the earlier User Guide, the Manual is a far more comprehensive document, providing greater detail on all aspects of procurement and

monitoring, with a focus on its acting as a platform for training-of-trainers workshops. The core sections of the document were prepared by an engineer with long experience of public procurement, with sections added by others. The Head of PPDC (whose title is Program Coordinator) took overall responsibility for quality control of the



Chibuzo Ekwewuo, Program Coordinator and Head of PPDC, Speaking at the Launch Of the Internet Portal

Manual, which was reviewed with great care by PPDC staff, before circulation to a group of stakeholder experts and detailed review at a workshop. The final version of the Manual has been distributed widely and is available on-line as a download. It is also being used elsewhere in West Africa, and it has been provided to the World Bank IDF program and Open Society Initiative for West Africa on request for translation to French for use in French-speaking West African Countries. Feedback on the Manual from those interviewed for the Evaluation was extremely positive.

The Capacity Development Workshop, with a focus on training-of-trainers, was completed successfully, with 33 participants, instead of the 25 planned. All training modules used in the workshop were made available to the trainees on CD-ROMs for further dissemination and for use in their own training work. A number of those who completed the training have gone on to conduct training for others in their own organizations, and other CSOs in their networks. Others have begun active monitoring, and have begun to file reports on the internet Portal. The names of all of those who completed training have been forwarded to BPP for accreditation.

The workshop covered a great deal of complex and challenging material on an intensive basis over two long days. Although materials were circulated in advance, according to participants, only those with a good prior knowledge of procurement and some understanding of the legal provisions of the PPA would have been able to benefit fully from the workshop.

PPDC has explained that the constraint, both to the number of participants and the number of days allocated to the activity, derived from the budget. While much work went into the Workshop, which was much appreciated by those who took part, it is

apparent that additional resources would have enhanced its effectiveness. The nature of the material covered does not lend itself well to a two-day workshop, particularly where a key learning objective is training-of-trainers. Given the centrality of this activity to the project, it would have been sensible to eliminate at least one other activity in order to fully support this one.

The work with the legislature is the one project component which was not fully successful. This is partly because the result proposed was unrealistic, in view of the temporary character of membership of the legislature. As noted above, under Risk, good working relations were established with the legislature and a key committee. However, as a result of the 2011 Parliamentary Election, the “champions” of the committee exercising its oversight function with regard to public procurement were defeated. The working partnership with elected members ceased. In its place, PPDC succeeded in establishing a solid working relationship with the Policy Analysis and Research Project (PARP) of the National Assembly, a research and policy support body, now known as the Legislative Studies Institute. This linkage holds some promise for the future.

The two final Medium-Term Impact Results addressed: a) *Measurable improvement in access to, and analysis and sharing of procurement information*; and, b) *Strengthened advocacy for improved transparency and accountability in the procurement process*. The key input for achieving result “a” was the design, testing and full operation of the internet Portal. Prior to the establishment of the Portal, there was no mechanism for recording and collating monitoring data, and, hence, no effective means to provide systematic feedback to the BPP and other relevant bodies for action where infringements to the rules and regulations were observed. The process of uploading procurement reports to the Portal began in 2010, with 49 reports being added, though many were incomplete. In 2011, a further 107 were uploaded, and 82 of these contained all the required information. All stakeholders, including the BPP and international donors and donor projects, indicated to the Evaluators that the project had conclusively achieved the intended result.

The principal contribution to result “b” was the completion and distribution of two Annual Assessment Reports on the status of implementation of the PPA. The first report covered the period 2007-2009 and the second, 2010-2011. The first report was based on the analysis of data obtained from questionnaires distributed to procurement stakeholders, including MDAs, while the second drew both on questionnaire data and analysis of reports filed to the internet Portal. The analytic work and drafting of the reports was led by an experienced public finance specialist, with support from PPDC staff.

Both reports generated a response from the stakeholder community. The first led to an initially hostile response from government. However, as it became apparent that the findings and recommendations included in the reports were all based on hard data, the response became more muted. The tone taken in the documents was that of offering a constructive appraisal, including very specific proposals, aimed at informing efforts to improve performance, and the value of the contribution made by the reports was acknowledged by the time of the publication of the 2010-2011 Report. It is apparent that the findings of the reports have provided an important tool for advocacy in service of strengthening the various dimensions of action relating to the implementation of the PPA.

The Assessment Reports are valued because of the objective methodology and evidence-based analysis on which they are built. However, while no criticisms were made by any of those interviewed for the Evaluation, it must be noted that, from a social science perspective, there are limitations to the research base of the work, which should be addressed.

The sample size for the stakeholder groups are extremely small, with a very low return rate for the questionnaires distributed. This undermines the claims made that the findings represent a cross-section of stakeholder support. Further, surprisingly, rather limited numbers of questionnaires were distributed. As noted elsewhere in the report, PPDC prides itself on its professionalism and credibility in the eyes of stakeholders, including the mass media. With this in mind, as a means to enhance the quality of its research work, it will do well in the future to seek the technical support of a social scientist –or relevant research centre- with proven expertise and experience in survey design and data analysis.

A second contribution to *Strengthened Advocacy* was the plan for selected NGOs, whose members had been trained through the Capacity Development Workshop to begin monitoring within specified priority sectors. Part of the agreement with three large international NGOs, which sponsored members of their CSO networks to take part in the training, was for the sponsoring organizations to take responsibility for supporting those trained in active step-down training, as well as monitoring in the education and health sectors. The three organizations concerned were ACTION AID, the Open Society Institute for West Africa and SRIP (EU). The agreement with ACTION AID and SRIP did not lead to follow-up action as a result of a turnover in senior staff with both organizations. There has been on-going cooperation with OSIWA. However, the plan for sector-focused monitoring has not fully materialized.

With the exception of the major setback experienced in the component concerning working with the legislature, and one element of the *Strengthened Advocacy* component, the project completed activities as planned and did an effective job in working towards the achievement of specified results. It is apparent that a greater contribution of resources in core areas and elimination of a few, less central activities, would have made for a stronger project. However, PPDC has an agenda to serve and support the community of organizations engaged in the effort to monitor and report on public procurement. All activities were relevant to that overall objective, and all will continue, in some fashion, beyond the UNDEF Project.

iii. Efficiency

A review of the project budget indicates a well-balanced deployment of resources in support of project objectives. Funds were managed carefully and all actual costs were in line with those projected in the initial budget.

Given the sheer volume and quality of outputs produced, it is clear that the project received good value from the salary costs of \$88,632 charged to the budget, amounting to 29.5% of funds available to the grantee. A further \$6,310 (2.1%) was billed for internal monitoring and evaluation and administrative/financial support. The two major components of programming costs were those associated with Meetings and Training Courses (\$78,406, or 26%), and Advocacy/Outreach (\$68,233, or 22.7%). The latter included publication costs and the development of the internet Portal. The costs for all budget items seem to have been reasonable.

In a few cases, as noted above in the case of the Capacity Development Workshop, project activities were under-budgeted. A second case concerned funding which was set aside to provide contributions to cover the costs incurred by individuals undertaking monitoring activities and completing reports. A system was devised for accredited individuals to register individual procurement monitoring initiatives, with a funding contribution to be made on uploading of a completed report. However, the amount allocated for each payment proved to be completely inadequate. Fortunately, PACT Nigeria agreed to fill the funding gap.¹⁵



Yussuf Maitima Tuggar, at the time, Chair of Legislative Committee on Public Procurement (in white) at PPDC Advocacy Visit to the Committee.

Project management responsibilities were borne by PPDC alone. Well-qualified and experienced consultants were recruited to undertake some major substantive tasks, including the preparation of the Procurement Monitoring Handbook and the drafting of the Procurement Assessment Reports. In addition, following a competitive bidding process, a contract was awarded to a private firm for design and development of the internet Portal. Given the importance of the place of the Portal in procurement monitoring and its performance in meeting stakeholder expectations, the contract would appear to have been a solid investment.

While this could not be readily expressed on an organization chart, there is an important and essential relationship between PPDC and the other core organizations within the National Procurement Watch Platform. Working relationships among individuals are built around trust, mutual support and shared experience and commitment. Throughout the project, PPDC received substantial in-kind support from core members of the network, while extending support to them in return. These trust-based working relationships were one of the foundations of project effectiveness and

¹⁵ Costs incurred for each monitoring initiative could be significant in terms of transportation and document copying charges. It might well be necessary for a monitor to visit the relevant government body on several occasions in order to obtain the required documentation. Two of the most experienced monitors suggested that it might well take four to five working days over a period of time to obtain the information necessary to facilitate the completion of the monitoring report.

efficiency, enabling the project to achieve more than an examination of the Project Document and budget might lead the reviewer to expect.

iv. Impact

The Development Objective for the project was modest and realistic in the scope of its ambition, and it may be concluded that the project had an impact on the problem, as stated. The Nigeria Project Monitoring Project took forward the effort to enhance transparency in government decision-making by increasing the pressure on government ministries, departments and agencies to live up to the provisions of the Public Procurement Act.

The initiative to build a strong and active cadre of trained and accredited monitors, to provide broad coverage of all procurement processes, at both federal and state levels, is at an early stage. However, what PPDC and its allies have accomplished is important in building the “infrastructure” to make reaching long-term goals feasible. Significant progress was made in this regard through completion of the activities supported by UNDEF.

The project also contributed to the growing recognition of the importance of transparent procurement processes in cleaning up corruption in the public sector. At the same time, it demonstrated what could be done by civil society groups in building up and focusing demand for good governance and strengthened democracy.

More broadly, the project has helped to enhance the standing and credibility of PPDC, indirectly strengthening its ability to carry out work beyond the scope of the project strictly defined. Following up on its efforts to open up the public procurement sphere to public scrutiny, with the support of like-minded law firms, PPDC launched a number of public interest legal cases against specific MDAs to enforce the requirement of the PPA concerning the obligation of government bodies to release all relevant information to civil society observers. A positive result was achieved recently in one such case, concerning the Power Holding Company of Nigeria (PHCN), which had refused to provide the necessary documents to an accredited monitor. In March, 2013, the Federal High Court in Abuja obliged the company to disclose materials containing details of a World-Bank supported contract for the supply and installation of High Voltage Distribution systems in Abuja, Lagos and Ibadan. The Court also instructed PHCN to pay the legal costs of PPDC, which initiated the case. The documents were released in compliance with the court order a month later on April 13.¹⁶

Moving beyond its focus on public procurement PPDC has also adopted innovative approaches to drawing broader public attention to the broader issue of corruption and its impact on ordinary citizens, notably through its engagement with the high-profile Nigerian film industry (“Nollywood”). In this respect, it organizes an annual film awards festival (the “Homevida Awards”) to encourage and honour both major films and short videos which emphasize the value of integrity in public life.¹⁷

¹⁶ See PPDC Web-site: <http://www.procurementmonitor.org/index.php?page=News&id=76>

¹⁷ <http://www.homevida.org/>

v. Sustainability

One of the difficulties to be confronted in considering work such as that undertaken by PPDC and its allies concerns the constant need for external resources to support the continuation of activities. In terms of GDP, Nigeria is a middle-income country. However, as discussed above, levels of poverty are high and inequality is extreme. Except within religious communities and at local level, there is no tradition of philanthropy in the country. Those NGOs which accept financial assistance from the government lose their independence.

PPDC has succeeded in obtaining funding from PACT Nigeria (USAID), as well as the World Bank and OSIWA. However, all assistance provided has been on a project-by-project basis. The World Bank, UNDP and PACT, all appreciate the need for reliable funding to facilitate continuous support to civil society public procurement monitoring. The Bank is now funding a West Africa (four-country) project to examine the issue further. For all this, unless public or private donors are prepared to support an endowment or trust fund, the continuing struggle to survive on the basis of project funding will continue.

The project succeeded in putting in place a system for guiding and recording monitoring reporting, which has been widely accepted and endorsed. It continues to operate. Currently, PPDC is exploring the possibility of an arrangement with a newly-established university-based public procurement research and training centre, associated with BPP, to co-host the internet Portal.¹⁸

While some of the longer-established NGOs, which are members of the National Procurement Watch Platform, are able to support some level of monitoring activity from their own resources, inevitably, the overall level of activity will decline without additional dedicated funding.¹⁹ Further, there is regular turnover in CSO ranks, and the level of knowledge required to be an effective monitor is significant. Therefore, there is a need for continuous training simply to maintain current numbers.

Putting Procurement Monitoring Training into Practice Based on interview with Seyi Moses and Lugman Ade Kunle, Zero Corruption Coalition

On the Monitoring Process:

“To begin, we review procurement announcements in the press and in the BPP’s Public procurement News. We make contact with the MDA (Ministry, Department or Agency), and receive an invitation letter, indicating that a procurement process is being initiated.

- We then observe the Bid Opening process. MDAs often think that only an invitation to the bid is required, but we then write a letter asking for all the other documents on the contract.

-In some cases now, we are also invited at the bid registration stage, and for negotiations for the “best final offer.”

-We are entitled to obtain *all* bid documents, including the tabulation of results (in assessing the bids put forward by competing bidders) and the recommendations on the contract awards - Normally, we – the members of our Coalition - work together as a team, to ensure that we can cover more than the bid opening, and follow up.

-A key problem for us in completing our work is the slow response of MDAs: but, we find that when they receive our letters, which refer to the Freedom of Information Act and the PPA, they are unaware of their responsibilities. As a result, we may need to meet with them and build *their* capacity to respond... Some MDAs are very cooperative and want to respond, but it requires several meetings before they fully understand what is needed.”

¹⁸ The project to establish the centre is supported by UNDP.

¹⁹ Currently, PPDC is working with the World Bank on a project to train and support procurement monitoring in the petroleum sector.

vi. UNDEF Added Value

The UNDEF project provided an injection of funding at a critical time in the development of the initiative to facilitate civil society monitoring of public procurement. The project contributed significantly to the building and acceptance of a system to provide for a consistent methodology for both monitoring and reporting, which proved acceptable to all parties. The level of financial support represented by far the largest contribution to date to PPDC and enabled it to invest the necessary resources in some key areas of activity, which have served to enhance the credibility of the civil society role in this sphere.

As the Head of the organization has emphasized, PPDC operates in an area of heightened sensitivity. For this reason, it is essential that the organization demonstrates its professionalism in all of its work, and particularly through the quality of its products, whether a web-site, a manual, or the report on an appraisal of current performance in public procurement. The UNDEF grant enabled PPDC, which is a small organization, to recruit the best professionals to support its work in these key areas, and to devote the necessary degree of attention to quality control. Other funding resources are available, but grants received from other sources have been more modest in scope and more limited in duration. The UNDEF grant made a real difference.

V. Conclusions

All conclusions are derived from the findings of the Evaluation, presented above.

i. On the whole, the Nigeria Procurement Monitoring Project represented an effective and worthwhile initiative and an effective use of UNDEF funds. It contributed in a modest but positive way to building integrity and transparency in governance, while also strengthening the capacity of civil society to make a difference in ensuring that the awarding of public contracts is done in accordance with the process set out in law.

ii. A particular strength of the project was the close working relationship, based on mutual trust and shared experience, between PPDC and its peers in the civil society network focused on governance and anti-corruption activities. A related strength was its impressive ability, in the course of the project, to build and enhance its credibility with government and international donor stakeholders, as well as Nigerian civil society.

iii. The carefully-built linkages across project activities facilitated the project's ability to achieve most of its results. In all cases, solid preparatory work laid the foundation for major events, which, in most cases, represented the culmination of an extended process.

iv. Given the project's overall focus on capacity development, it is, at first glance, disappointing that only 33 monitors were trained directly through the project (others were trained indirectly by "step-down" training conducted by those who had completed the training-of-trainers course). However, this was *not* a training project, and what was more important was the contribution to developing and testing the curriculum and methodology for training of trainers.

v. There remains a large unmet need for the training of large numbers of additional monitors, capable of meeting accreditation standards, as well as for strengthening the capacity of those who have already been trained.

vi. The Annual Assessment Reports proved to be an excellent tool for drawing attention to the depth of the problem to be addressed in public procurement, while also acknowledging improvements where they had been made. At the same time, the Evaluation identified weaknesses in the research which provided the basis for the reports, pointing to the need for PPDC to draw on social science expertise in survey design and data analysis to remedy the deficiencies.

vii. A detailed review of the project budget in relation to the activities completed demonstrates that UNDEF funds were deployed with care in support of

achieving project results. A few key activities were under-budgeted, reflecting an over-ambitious agenda.

viii. As a result of its relatively narrow focus, careful preparations and the practical approach adopted, the project did have a modest, but significant, impact on the development problem addressed.

ix. Sustainability is problematic, given the absence of domestic sources of finance outside government, and the paramount need for PPDC to retain its independence. However, a number of steps have been taken to ensure that core activities supported by UNDEF will continue beyond the project.

VI. Recommendations

It is recommended that:

i. In view of the frequent difficulty experienced by international donors in identifying projects which might make a difference in countries with high levels of corruption, **UNDEF** gives particular attention to the viability of providing support to other, well-prepared projects concerned with civil society monitoring of public procurement.

ii. Given the scope of the problem addressed in this project and the positive review given in this Evaluation of the performance of the grantee, **UNDEF** considers providing a further grant to support its work, should a well-planned proposal be received.

iii. In light of the huge increase in capacity and numbers of qualified civil society monitors required to provide adequate coverage of Nigeria's overall public procurement activities, **PPDC** continue with the approach to focus its efforts to identify and work in priority sectors.

iv. **PPDC** strengthens the social science base of the research which provides the foundation to its Annual Assessment Reports.

v. **PPDC** gives careful thought to focusing resources in future projects on major activities, critical to the achievement of core results, ensuring that they receive the funds required to complete the work and reinforce short-term outputs, particularly in the sphere of training.

vi. Particularly given its experience in working with the legislature, **PPDC** gives closer attention to risk assessment and risk mitigation strategies at the time of project design and specification of results.

VII. Overall assessment and closing thoughts

The Nigeria Procurement Monitoring Project was a thoroughly worthwhile initiative and an effective investment of UNDEF funds. In a country which is highly politicized, and working in a sensitive area at the heart of public sector corruption, PPDC has developed an admirable reputation for professionalism, integrity and for taking a non-partisan approach. It has credibility with government anti-corruption agencies, as well as with civil society. The task on which it is embarked is enormous, but the UNDEF project represented a manageable piece of this much larger problem, and succeeded in achieving most of the results planned.

The scope of public procurement in Nigeria is vast. There are 800 MDAs, and, given the number of contracts awarded annually, it has been estimated that 8,000 monitors are required to provide adequate coverage. So far, only 137 monitors have been accredited by BPP. However, monitoring is not a full-time job, but can be managed as an add-on to the normal work of civil society groups. This is why it is urgent for PPDC and the National Procurement Watch Platform to engage with CSOs working in a variety of social, economic and cultural sectors. The link with OSIWA on health and education is a beginning in this regard.

The public procurement monitoring initiative represents a practical and focused way to make progress in addressing the seemingly intractable problem of corruption in Nigeria. It also stands out as an effective way for civil society to organize its efforts to bring about change in opening up what has been a closed governance system, built up over decades of military rule, ending only in 1999. There is much more to be done, but a solid foundation has been built. Given the quality of the work undertaken so far, and the huge unmet need to be addressed, UNDEF might be well-advised to give consideration to further investment in this sphere in Nigeria, as well as further support to the grantee.

VIII. ANNEXES

Annex 1: Evaluation questions

DAC criterion	Evaluation Question	Related sub-questions
Relevance	To what extent was the project, as designed and implemented, suited to context and needs at the beneficiary, local, and national levels?	<ul style="list-style-type: none"> ▪ Were the objectives of the project in line with the needs and priorities for democratic development, given the context? ▪ Should another project strategy have been preferred rather than the one implemented to better reflect those needs, priorities, and context? Why? ▪ Were risks appropriately identified by the projects? How appropriate are/were the strategies developed to deal with identified risks? Was the project overly risk-averse?
Effectiveness	To what extent was the project, as implemented, able to achieve objectives and goals?	<ul style="list-style-type: none"> ▪ To what extent have the project's objectives been reached? ▪ To what extent was the project implemented as envisaged by the project document? If not, why not? ▪ Were the project activities adequate to make progress towards the project objectives? ▪ What has the project achieved? Where it failed to meet the outputs identified in the project document, why was this?
Efficiency	To what extent was there a reasonable relationship between resources expended and project impacts?	<ul style="list-style-type: none"> ▪ Was there a reasonable relationship between project inputs and project outputs? ▪ Did institutional arrangements promote cost-effectiveness and accountability? ▪ Was the budget designed, and then implemented, in a way that enabled the project to meet its objectives?
Impact	To what extent has the project put in place processes and procedures supporting the role of civil society in contributing to democratization, or to direct promotion of democracy?	<ul style="list-style-type: none"> ▪ To what extent has/have the realization of the project objective(s) and project outcomes had an impact on the specific problem the project aimed to address? ▪ Have the targeted beneficiaries experienced tangible impacts? Which were positive; which were negative? ▪ To what extent has the project caused changes and effects, positive and negative, foreseen and unforeseen, on democratization? ▪ Is the project likely to have a catalytic effect? How? Why? Examples?
Sustainability	To what extent has the project, as designed and implemented, created what is likely to be a continuing impetus towards democratic development?	<ul style="list-style-type: none"> ▪ To what extent has the project established processes and systems that are likely to support continued impact? ▪ Are the involved parties willing and able to continue the project activities on their own (where applicable)?
UNDEF value added	To what extent was UNDEF able to take advantage of its unique position and comparative advantage to achieve results that could not have been achieved had support come from other donors?	<ul style="list-style-type: none"> ▪ What was UNDEF able to accomplish through the project that could not as well have been achieved by alternative projects, other donors, or other stakeholders (Government, NGOs, etc.). ▪ Did project design and implementing modalities exploit UNDEF's comparative advantage in the form of an explicit mandate to focus on democratization issues?

Annex 2: Documents Reviewed

Amundsen, Inge, Good Governance in Nigeria: A Study in Political Economy and Donor Support, NORAD, August 2010.

Amundsen, Inge, "Who Rules Nigeria?" Norwegian Peace-Building Research Centre (NOREF) Report, November 2012.

Bertelsmann Stiftung Transformation Index, BTI 2012: Nigeria Country Report.

International Crisis Group, "Lessons from Nigeria's 2011 Elections", Africa Briefing, no.81, September 15, 2011.

LeVan, Carl and Ukata, Patrick, "Nigeria", in Countries at the Crossroads, Freedom House, 2012.

PPDC, Implementing the Nigerian Procurement Law: Compliance with the Public Procurement Act, 2007. An Evaluation of Procuring Entities, Civil Society Organizations, Bidders and the Bureau of Public Procurement, 2011 (covering the period 2009-2011), 2011..

PPDC, Non-State Actors and Procurement Watch in Nigeria, 2008.

PPDC, Public procurement Act 2007: A Simplified Version (not dated).

PPDC, Public Procurement Monitoring: A Facilitator's Manual, 2011.

PPDC, User Guide to Public Procurement Observation Checklist, 2010.

PPDC, Walking the path of Procurement Reforms in Nigeria, Compliance with the Public procurement Act, 2007: An Evaluation of Procuring Entities, Civil Society Organizations, Bidders and the Bureau of Public Procurement, 2012.

UNDP, Human Development Indicators: Nigeria, Country Profile 2011.

Utomi, Pat, Duncan, Alex and Williams, Gareth, "Nigeria: the Political Economy of Reform: Strengthening the Incentives for Economic Growth", The Policy Practice, Updated Version, October 2007

Annex 3: Persons Interviewed and Field Mission Schedule

March 19, Tuesday
<ul style="list-style-type: none"> • Initial meeting with Chibuzo Ekwekwuo, Coordinator, PPDC; • Seyi Moses and Lugman Adefohahan, Program Officers, Zero Corruption Coalition (at PPDC); • Auwal Musa Ibrahim Rafsanjani, Executive Director, Civil Society Legislative Advocacy Centre (CISLAC) and National Procurement Watch Platform; • Chief Bayo Awosemusi, Lead Procurement Specialist/OS Sector Leader, World Bank Nigeria Country Office.
March 20, Wednesday
<ul style="list-style-type: none"> • Dr. Patterson Ekeocha, Economic Policy Advisor, Nigeria Governors' Forum; • Adebowale A. Adedokun, Assistant Director, Bureau of Public Procurement; • Babatun deOluajo, Executive Secretary, Zero Corruption Coalition; • Detailed Review of Project Activities with PPDC team: Chibuzo Ekwekwuo, Program Coordinator; Ms Seember Nyager, Procurement Program Administrator; Ms Nkem Ilo, Program Officer; and Ms Helen Abawulo, Program Accountant
March 21, Thursday
<ul style="list-style-type: none"> • PACT Nigeria (USAID): Adu Liman, Country Director; Ahmed N. Mohammed, Deputy Country Director and Chief of Party, ADVANCE Project; Ms Augusta Akparanta-Emenogu, Program Manager, ADVANCE; Oghenewareghe Frederick-Simon, Director of Grants and Finance; • Ms Felicia Bot-Timothy, Acting Head, and Kalu Aja, Program Officer, Enlightenment and Reorientation Unit, Public Affairs Department, Economic and Financial Crimes Commission (EFCC); • Peter Ocheikwu, Program Coordinator, Nigeria, Open Society Initiative for West Africa (OSIWA); • Ms Folake Oluokun, Program Analyst, Anti-Corruption and Public Procurement, UNDP; • Dr. Adeyeye Adewole, Director, COPE-Africa, Ibadan (telephone interview).
March 22 , Friday
<ul style="list-style-type: none"> • Nigerian Society of Engineers: Dr. Tunde Olatunji, Director, Professional Development; Professor Abubakr, Head, Technical Committee; Engineer Deyo Olagboye; Engineer Isibor Simeon; • PPDC: review of the internet Portal, Seember Nyager; • Yosuf Maiama Tuggar, Nordic Oil and Gas Services and Neroli Technologies Limited, former Chair of House of Representatives' Committee on Public Procurement. • National and International Consultant, debrief and review.

Annex 4: Acronyms

BPP	Bureau of Public Procurement
CD-ROM	Compact Disc-Read Only Memory
CPAR	Country Procurement Assessment Report
CSO	Civil Society Organization
DAC	Development Assistance Committee
EQ	Evaluation Question
GDP	Gross Domestic Product
GE	Gender Equality
HDI	Human Development Index
ICPC	Independent Corrupt Practices and Other Related Offences Commission
ICT	Information and Communications Technology
MDAs	Ministries, Departments and Agencies
NA	National Assembly
NGO	Non-Governmental Organization
NORAD	Norwegian Agency for Development Cooperation
NOREF	Norwegian Peace-Building Research Centre
NPWP	National Procurement Watch Platform
OSIWA	Open Society Initiative for West Africa
PARP	Policy Analysis and Research Project
PHCN	Power Holding Company of Nigeria
PPA	Public Procurement Act
PPDC	Public and Private Development Centre
ToT	Training-of-Trainers
UN	United Nations
UNDEF	United Nations Democracy Fund
UNDP	United Nations Development Program
US	United States
USAID	United States Agency for International Development