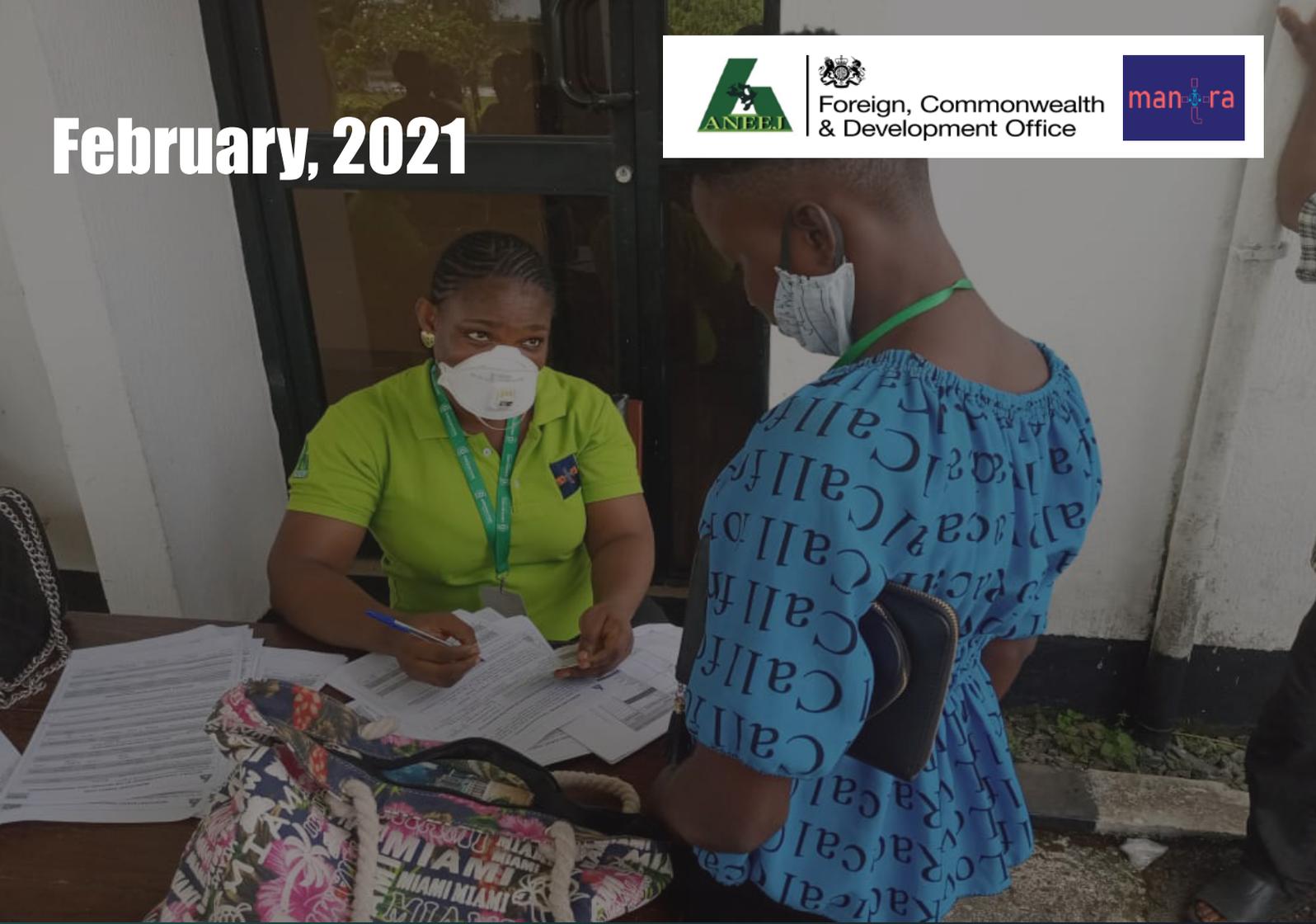


February, 2021



Foreign, Commonwealth
& Development Office



FINAL PROGRAMMATIC REPORT OF MANTRA PROJECT

BY

**AFRICA NETWORK FOR ENVIRONMENT
AND
ECONOMIC JUSTICE (ANEEJ)**

ACKNOWLEDGEMENT

The Africa Network for Environment and Economic Justice (ANEEJ) wishes to appreciate all stakeholders for the smooth implementation of the Monitoring of Recovered Assets Through Transparency and Accountability (MANTRA) Project, a vehicle for the monitoring of the recovered \$322.5 million Late General Sani Abacha loot II in Nigeria.

First, our appreciation goes to God almighty who assembled the ACORN-MANTRA team from all backgrounds and gave us wisdom, good health to implement the project.

We also appreciate the invaluable support provided by the Foreign, Commonwealth and Development Office (FCDO) through its broader Anti-Corruption in Nigeria (ACORN) Programme aimed at strengthening the anti-corruption regime in Nigeria. In this respect, we wish to place on record the significant role played by the ACORN team led by Mr Chris Okeke throughout the innovative processes which the project entails. We also place on record the invaluable role of the former ACORN programme SRO, Ms Sonia Warner who followed through all our initial plans for MANTRA and provided very useful insights and guide for a successful implementation.

We equally appreciate the eight MANTRA implementing partners across the six geopolitical zones of Nigeria: Bayelsa Non-Governmental Organisations Forum (BANGOF), Bayelsa State, Civil Resource Development and Documentation Centre (CIRDDOC) Enugu, Resource Centre for Human rights and Civil Education (CHRICED), Kano, Centre for Social Justice (CSJ), Abuja, Socio-Economic Research and Development Centre (SEDEC), Lokoja, the New Apostolic Church Centre for Development, (NAC Centre for Development, Benin City, Fahimta Women and Youth Development Initiative (FAWOYDI), Bauchi State and New Initiative for Social Development (NISD).

It is equally important to acknowledge the government stakeholders for their collaborative spirit and positive disposition towards the implementation of the project. These include the Vice President of the Federal Republic of Nigeria, Prof Yemi Osinbajo who launched the MANTRA Project, the Honourable Attorney-General and Minister of Justice, Abubakar Malami (SAN), Special Adviser to the President on Social Investment, Mrs. Maryam Uwais, Special Adviser to the President on Justice Sector reform, Mrs Juliet Ibekaku-Nwagu, Head of the Asset Recovery and Management Unit (ARMU), Hajia Ladidi Mohammed, the Coordinators of the National Social Safety-Nets Coordinating Office and the National Cash Transfer Office, Mr. Iorwa Apera and immediate Past Head of NCTO, Dr. Temitope Sinkaiye, members of the National Assembly both the Upper and Lower chambers, in particular, Senator Chukwuka Utazi as well as the Open Government Partnership Secretariat.

Our deepest appreciation also goes to Religious leaders, Community Leaders, Civil Society Organisations and over 800 monitors who were deployed in the field for the monitoring exercises, without whose cooperation and active participation, implementation of this project would not have been possible. We equally appreciate the various media houses whose participation, exceptional media coverage and publicity contributed in consolidating the achievements recorded in this project.

Finally, we recognise the leadership and supervisory role provided by the Deputy Executive Director of ANEEJ, Mr. Leo Atakpu and other team leaders in the implementation of the Project. We remain grateful to Mr. Innocent Edemhanria for coordinating the monitoring exercises, the M&E Consultant, Dr Omowunmi Olabalu Asani for her leading role in the design and implementation of the monitoring framework, as well as all other staff who worked untiringly to ensure the successful implementation of the MANTRA project.

Rev. David Ugolor

Executive Director, ANEEJ

ACRONYMS

ACORN	DFID Nigeria's Anti-Corruption in Nigeria Programme
ANEEJ	Africa Network for Environment and Economic Justice
ARMU	Asset Recovery and Management Unit
BANGOF	Bayelsa State Non-Governmental Organisations Forum
CBN	Central Bank of Nigeria
CBOs	Community Based Organisations
CIFAR	Civil Forum for Asset Recovery
CIRDDOC	Civil Resource Development and Documentation Centre
CHRICED	Resource Centre for Human Rights and Civic Education
CPI	Corruption Perception Index
CSJ	Centre for Social Justice
CSO	Civil Society Organization
DEC	Development Exchange Centre
DFID	Department for International Development
DQA	Data Quality Assessment
DSS	Department of State Service
FACTI	Financial Accountability Transparency and Integrity
FAWYODI	FAHIMTA Women and Youth Development Initiative
FAQ	Frequently Asked Questions
FBOs	Faith Based Organisations
FCDO	Foreign, Commonwealth and Development Office
FMOJ	Federal Ministry of Justice
GFAR	Global Forum on Asset Recovery
IACC	International Anti-Corruption Conference
IACT	International Action Against Corruption
LEAs	Law Enforcement Agencies



LGA	Local Government Area
M&E	Monitoring and Evaluation
MANTRA	Monitoring of Recovered Assets in Nigeria through Transparency and Accountability
MD	Managing Director
MDA	Ministry, Department or Agency
MNDA	Ministry of Niger Delta Affairs
MOU	Memorandum of Understanding
NCD	New Apostolic Church Centre for Development
NASS	National Assembly
NASSCO	National Social Safety-Nets Coordinating Office
NBR	National Beneficiary Register
NCTO	National Cash Transfer Office
NDDC	Niger Delta Development Commission
NG	Non-Governmental Organisation
NISD	New Initiative for Social Development
NNSA	Nigerian Network on Stolen Assets
NSIO	National Social Investment Office
NSR	National Social Register
OGP	Open Government Partnership
PACAC	Presidential Advisory Committee Against Corruption
POCA	Proceeds of Crime Act
PPEs	Personal Protective Equipment
SERDEC	Social Economic Research and Development Centre
STAR	Stolen Asset Recovery Initiative
UNCAC	United Nations Convention Against Corruption
UNGASS	United Nations General Assembly Special Session
UK	United Kingdom
USA	United States of America

PROJECT SUMMARY

Short Title of Project	Monitoring of Recovered Assets in Nigeria through Transparency and Accountability (MANTRA) Phase II.
Name of Lead Organisation	Africa Network for Environment and Economic Justice (ANEEJ)
Start Date	1 April, 2018
End Date	31 January, 2021
Brief Summary of Programme	<p>ANEEJ, working with Eight (8) partners drawn from the six geo-political zones of the country, is implementing MANTRA project under Anti-Corruption in Nigeria (ACORN) programme of DFID Nigeria. This project is to deepen the gains recorded in Mantra Phase I by mobilizing Civil Society Organisations and citizens to monitor the use of repatriated \$322.5million loot and any other recovered loot as well as advocate for the improvement of the policy and legislative framework for asset recovery in Nigeria.</p> <p>MANTRA II is focused on Monitoring the \$322.5million Abacha loot returned from Switzerland and the \$900,000 connected to Bayelsa State former Governor, Late Diepriye Alamiyeseigha expected to be returned from United States of America (USA), as well as the £73,000 Malabo Oil loot returned from United Kingdom. ANEEJ and its 8 partners are engaging relevant government officials to improve the policy environment for asset recovery and management of returned loot as well as contributing to improving the implementation of the commitments arising from the 2016 London Anticorruption Summit and Global Forum on Asset Recovery (GFAR).</p> <p>Mantra Phase II is also working on behavioural changes and Social Norms that fuel corruption in Nigeria with a view to taking actions that would bring about needed changes and reversal of the trend.</p>
Target Groups/Beneficiaries	Poorest of the poor Nigerians enrolled under the Conditional Cash Transfer Programme by NASSCO, Government Institutions (FMoJ), Edo Government, Bayelsa Government, Asset Recovery and Management Unit (ARMU), religious and social groups, political parties and Nigerian citizens who are victims of corruption.
Consortium Partners	Africa Network for Environment and Economic Justice-ANEEJ (Consortium Lead), Bayelsa State NGO Forum (BANGOF), Civil Resource Development and Documentation Centre (CIRDDOC), Centre for Social Justice (CSJ)), New Initiative for Social Development (NISD) and Resource Centre for Human Rights and Civic Education (CHRICED), New Apostolic Church Centre for Development (NACCED) and Socio-economic Research and Development Centre (SERDEC).
Report Prepared By	Africa Network for Environment and Economic Justice (ANEEJ)

EXECUTIVE SUMMARY



This is the final report of the MANTRA Phases 1 and 2 projects implemented between the period of April 2018 to January 2021. Over 200 interventions were conducted in 32 states of Nigeria and 3 international countries namely Canada, UK and Abu Dhabi with a participation of over 4,000 unique individuals. The MANTRA project is designed to address the problems of lack of a clear policy framework for the management of looted assets recovered, re-looting of recovered assets by corrupt public officials and low public awareness and advocacy on the recovery and use of looted assets.

The MANTRA project contributed to increased Coordination of Asset Recovery in Asset recovery MDAs (Federal Ministry of Justice (FMOJ) in Nigeria and the National Cash Transfer Programme). MANTRA supported the Federal Ministry of Justice through ARMU to develop a Central Database for Asset Tracing, Recovery and Management Regulations (ATRM), and the Central Criminal Justice Information System (CCLIS) as well as strengthening of transparency in reporting utilization of recovered assets and ensuring identification of corrupt acts in the disbursement of the recovered assets to prevent re-looting of such assets. This has further led to the setting up of an Inter-ministerial Committee approved by the President for the disposal of all forfeited assets amounting to some N4-5trillion. ANEEJ is representing Civil Society in this presidential committee.

<https://www.aneej.org/fg-inaugurates-22-member-asset-disposal-committee-gives-6-months-timeline-aneej-chief-assures-on-use-of-gfar-principles/>

The project has largely contributed to reforms in the FMOJ which include development of the Asset recovery and Management Guidelines which is now a gazette. The passage of the Proceeds of Crime Bill POC Bill (even though not assented to by the President) and Mutual Legal Assistance Act. It also supported the Open Government Partnership (OGP) in Edo state making it the first state to signed in the South-South in September 2018 as well as Delta state which has indicated interest. The project also supported the OGP National Secretariat and the anti-corruption subcommittee of National OGP. The project intervened in the dispute between Delta State and the Federal Governments on who takes ownership of the utilization of the £6.8 million James Ibori repatriated funds.

Similarly, engagement meetings of MANTRA team also led to assigning the utilization of the former Governor Diepriye Alamiyeseigha of Bayelsa State assets to the health sector instead of Judges Quarters earlier proposed by the state government.

MANTRA project witnessed the repatriation of 6 recovered assets to Nigeria during the life of the project. These recovered assets are Recovered \$322.5 million Abacha loot (Abacha 2), \$85 million from the UK relating to the Malabo oil deal involving a former Minister of Petroleum Resources, Mr. Dan Etete, \$900,000 Alamiyeseigha loot from the United States of America, £ 6.8 million James Ibori Loot, \$311.79 Recovered Abacha loot (Abacha 3) and €5.5million Recovered Abacha Loot from Ireland(Abacha 4).

1. Democracy Day: ANEEJ Tasks 9th National Assembly On POCA, Other Anti-Corruption Bills

<https://www.aneej.org/democracy-day-aneej-tasks-9th-national-assembly-on-poca-other-anti-corruption-bills/> SIGN POCA, MLA BILLS INTO LAW, ... ANEEJ, MANTRA Partners Urge President Buhari

<http://www.aneej.org/sign-poca-mla-bills-into-law-%EF%BB%BFaneej-mantra-partners-urge-president-buhari%EF%BB%BF/> SIGN POCA, MLA BILLS INTO LAW, ... ANEEJ, MANTRA Partners Urge President Buhari

<https://easitimes.com/sign-poca-mla-bills-into-law-aneej-mantra-partners-urge-president-buhari>

An end-to-end monitoring of use of returned \$322.5million Abacha loot II being disbursed to poor Nigerians through the conditional cash transfer programme of the Nigeria Social Investment Programme (NISIP) For instance, \$148 million (46%) has been spent so far from the Abacha 2 funds. 950,783 poor families benefited from the returned asset disbursed through the country's Conditional Cash Transfer in 32 States of Nigeria as at August 2020.

Over 76 key documents produced comprise Programme reports, Baseline reports, research and policy briefs, monitoring reports, Monitoring and Evaluation reports and online news reports, Updates and fliers.

At the international level, MANTRA Model was globally accepted. ANEEJ organized side meetings at three international events to share lessons on the MANTRA model of asset recovery and management. These events were the OGP Summit in Ottawa, Canada, May 2019, the World Bank annual meetings held 18 October, 2019 and at the 8th Session of the Conference of the States Parties to the United Nations Convention Against Corruption held at Abu Dhabi, United Arab Emirate 19th December, 2019. Also, MANTRA project made submissions to the guidelines on stolen Assets and Human Rights, UNGASS, IACT and FACTI. MANTRA project impact was also acknowledged in Transparency International report published 2020 titled EXPORTING CORRUPTION; Progress report 2020: Assessing enforcement of the OECD Anti-Bribery Convention.

<https://images.transparencycdn.org/images/A-short-version-of-Exporting-Corruption-2020.pdf>

On the social norm work and behavior change, MANTRA team began a process of public sensitization through the launching of “corruption must not pay” campaign in Abuja at the first year of the project. This campaign was trickled down to the states leading to workshop of religious and traditional leaders and related interventions. The response of the MANTRA project to the COVID-19 Pandemic was demonstrated in the programmatic and organizational operations of MANTRA project. This led to development of COVID-guidelines and increase spot checks of the Cash transfer programme among others. This eventually led to the first payments to CCT beneficiaries in Bayelsa, Abia, Delta and subsequently in Akwa Ibom after the last payments was made in December 2019.

The MANTRA project also witnessed increased support and fulfilment of 4 of the GFAR commitments identified, 3 Nigerian London anticorruption summit commitments and 1 UNCAC commitment. All these results were achieved through the collaborative working relationship with the Nigerian and UK Governments, the donor community, Civil Society and citizens. This remains a major lesson of the project and we thank the Foreign, Commonwealth and Development Office (FCDO) for the support and it is hoped that with the termination of contract by the FCDO, MANTRA would leverage on the existing structures and goodwill of various stakeholders to continue the momentum of combating corruption through advocacy for transparency and accountability in Asset recovery and Management.

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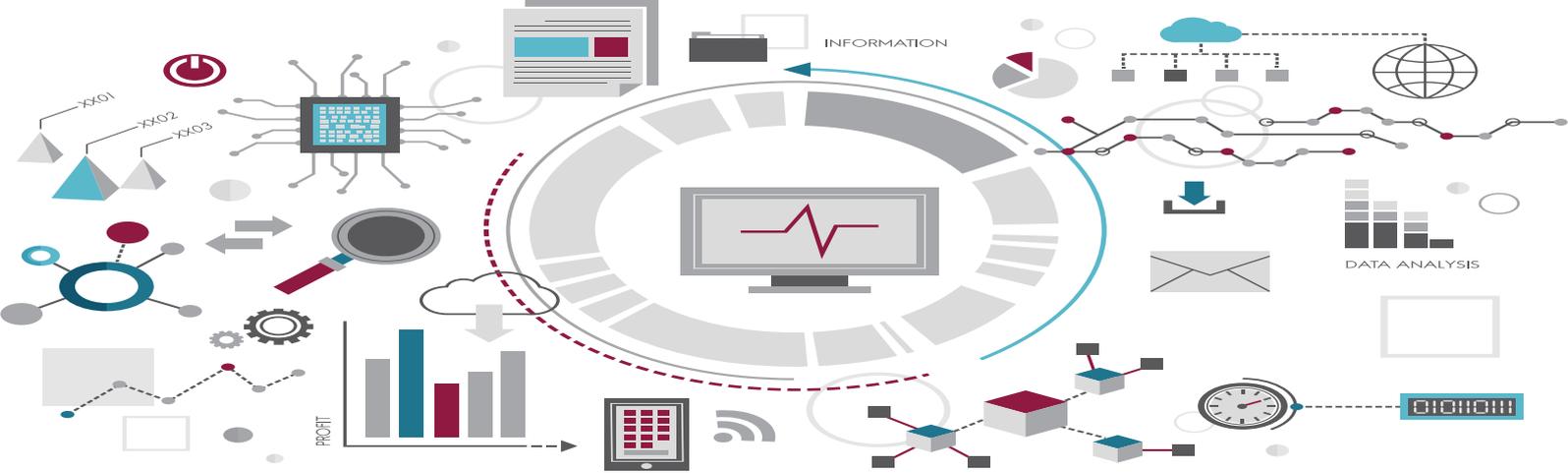
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1.1 Background

Corruption remains a major impediment to development in Nigeria. Despite years of concerted anti-corruption efforts, the perception of the prevalence of corruption remains high, with its public institutions considered ineffective and incapable of controlling corruption and preventing the mismanagement of state resources. It is also estimated that the country loses about 40 percent of its natural wealth to corruption and corruption-related mismanagement. A report by the Thabo Mbeki High Level Panel on Illicit Financial Flows from Africa indicated that Nigeria lost about \$40.9 billion through illicit financial flows between 2001 and 2010.

Some progress has been made in recent years in terms of repatriation of stolen funds from foreign jurisdictions as well as local recoveries in the country. These include commitments made by Nigeria under the Global Forum on Assets Recovery (GFAR), the London Anti-corruption Summit, United Nations Convention against Corruption (UNCAC) and other global regimes and the involvement of Civil Society Organizations (CSO) in monitoring the use of recovered assets. However, Nigeria had a very low baseline in this area. For example, the Swiss Government returned over \$700 million to Nigeria over the past decade, with very limited accountability and transparency in terms of what these monies were used for. Emerging research also points a broader normative problem in the Nigerian society, citizens often demonstrate a degree of tolerance for corruption and are slow in acting against the crime. In 2017, almost a third (32.3 per cent) of Nigerian adults paid bribes when in contact with public officials, with roughly N400 billion spent on bribes each year.

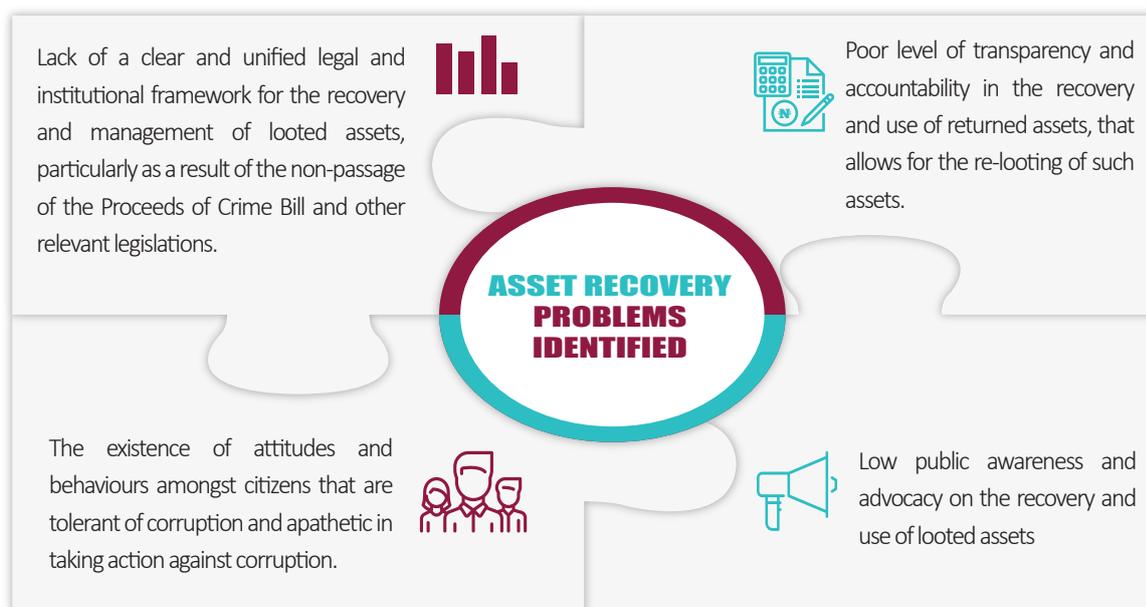


Figure 1: Asset Recovery Problems Identified

² Amanda Wheat, "West Africa: The BP Oil Spill Spells Disaster for Region" MediaGlobal (18 June 2010).

³ Report of the High-Level Panel on Illicit Financial Flows from Africa, Commissioned by the Africa Union/ECW Conference of Ministers of Finance, Planning and Economic Development (2015)

<https://www.uneca.org/sites/default/files/PublicationFiles/iff_main_report_26feb_en.pdf> accessed 10 January 2010.

⁴ UNODC and NBS, Corruption in Nigeria: Bribery; Public Experience and Response (UNODC, 2017)

MANTRA was designed to address issues of corruption within the broader objectives of the Anti-Corruption in Nigeria (ACORN) programme of the British Government's Foreign, Commonwealth and Development Office (FCDO) which aims to strengthen the anti-corruption regime in the country. The MANTRA project aims to ensure that assets recovered are disbursed or invested in programmes for the benefits of the citizens of Nigeria. ANEEJ is the host of the MANTRA project. ANEEJ led a coalition of civil society organizations (CSOs) in providing independent monitoring of the use of the recovered funds to prevent re-looting, (which has been the case with previous returns) and to achieve institutional strengthening for asset recovery, management and utilisation in Nigeria.

ANEEJ selection for participation in this process was based on her history, previous engagement and relationship of ANEEJ with government on recovered assets in Nigeria. ANEEJ had conducted high level policy dialogues on asset recovery, and monitored the use of previously recovered assets. ANEEJ had also engaged with the Switzerland Government at the policy level on GFAR principles. As part of her history, ANEEJ led capacity building of selected CSOs and journalists to support anti-corruption effort by engaging the relevant arms/agencies of government on the implementation of OGP and UNCAC6. ANEEJ had also led CSOs participation in the 2nd UNCAC review cycle. ANEEJ led Civil Society participation at the maiden GFAR summit in Washington DC in 2017.

Since the death of General Sani Abacha in 2004 believed to have stolen over \$4.3billion, Switzerland has repatriated close to \$1billion to the country and a huge chunk of his loot are still stashed in Switzerland, United States of America and other offshore destinations. Nigerian CSOs led by Africa Network for Environment and Economic Justice have been campaigning since 1998 for the repatriation of all Nigeria's looted assets stashed in secrete destinations overseas to finance development, popularising the "it takes two to tango" theory in the global war against corruption. In 2004-2005, ANEEJ led CSOs monitoring of repatriated Late General Sani Abacha loots in a tripartite agreement between the World Bank, Nigerian Government and Switzerland Government.

1.2 Overview of Project Approach



The MANTRA project addressed the 3 pillars of the ACORN project.

MANTRA utilized the following approaches to address the problems identified as at midterm of the project:

1. *Establishing relationships between government stakeholders and civil society in enhancing the policy and institutional framework for asset recovery in Nigeria*

The project established relationships between Government stakeholders at National and Sub National levels. Developing these relationships for engagement purposes was crucial and key to sustainable partnerships for improvements in asset recovery management framework, interventions and indices in the country.

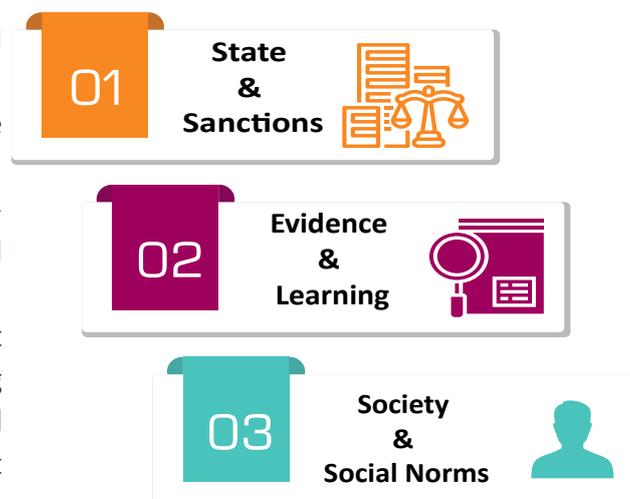


Figure 2: Three Pillars of the ACORN project

2. Engaged in advocacy to ensure the passage of essential anti-corruption bills and the establishment/strengthening of institutions in the area of asset recovery

MANTRA thereafter engaged stakeholders in the supply side of Government (the Executive and the Legislators) to ensure the passage of anti-corruption bills by the Legislators, and the establishment of the operational systems, framework and guidelines for the effective management of the recovered assets by the Executive (Federal Ministry of Justice). MANTRA also ensures there is a CSO presence in the systems and structure developed for asset recovery management to ensure sustainable citizens and CSO engagement on asset recovery interventions in the country

3. Strengthened the civil society partners on the MANTRA project to build a sustainable coalition of citizens around asset recovery

MANTRA has strengthened a network of 112 civil society partners for anti-corruption in asset recovery across the country. The project works through a strategy that engages with the CSO in a formal partnership arrangement. The other 104 grassroots based CSOs are thereafter engaged in a step-down manner in a loose structure of partnership to ensure sustainability and ownership of interventions at the community level.

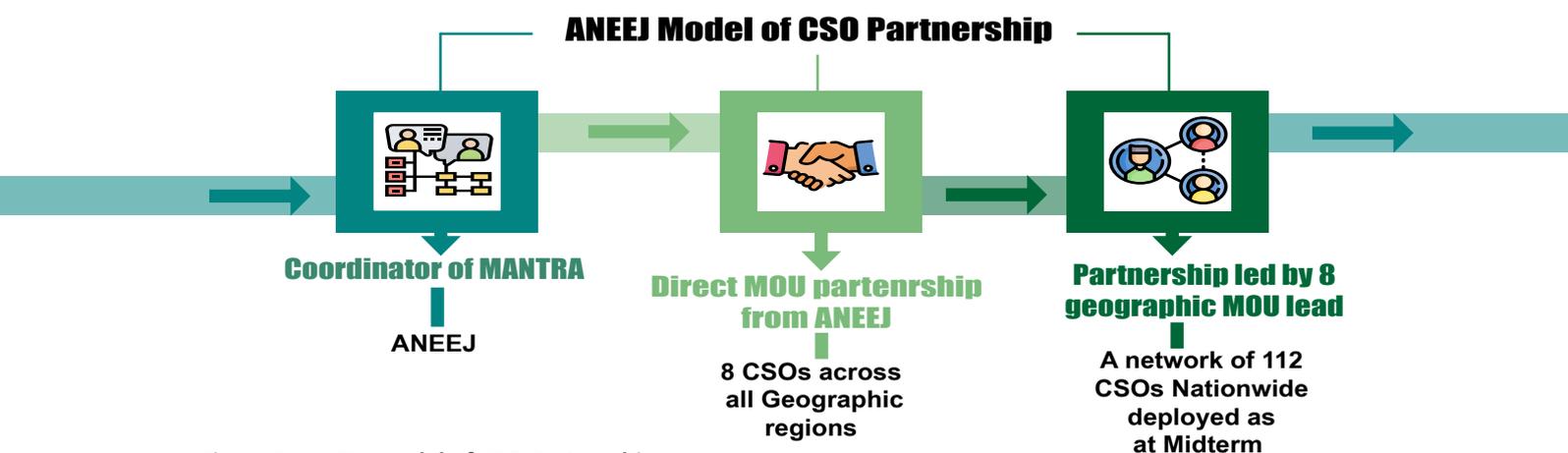


Figure 3: ANEEJ Model of CSO Partnership

4. Enhanced the capacity of CSO and citizens to monitor the recovery and utilisation of recovered assets in Nigeria

CSOs and citizens engaged for anti-corruption in asset recovery interventions had no prior history of intervention on the utilization or management of recovered assets in Nigeria. By training these citizens and organizations and coordinating them to effectively monitor and advocate for the transparent utilization of recovered assets in their communities, MANTRA has improved the capacity of a new group of CSOs and citizens to sustainably engage in asset recovery and monitoring interventions. This role is also acknowledged in the Transparency International report produced this year 2020 titled EXPORTING CORRUPTION; Progress report 2020: Assessing enforcement of the OECD Anti-Bribery Convention.

5. Applied behavior changes communication mechanisms geared towards changing social norms around corruption

The project commenced activities to improve knowledge on the status of asset recovery in Nigeria. This was the first step in a series of planned interventions to ultimately change social norms on corruption in Nigeria. The project also engaged citizens in campaign activities against corruption in Nigeria.

6. Sharing lessons learnt in the international arena

There was clear dearth of information on asset recovery interventions and progress in the Nigerian space in the international arena. This lack of information impedes other asset recovery efforts as it reduces the confidence of the international community in the ability of Nigeria to utilize the recovered assets in a non-corrupt manner for the benefit of its citizens. MANTRA ensured that lessons learnt from the project is disseminated to the international community through participation and organizing side meetings in dissemination events in different countries of the world. This contributed to CSOs advocacy for transparency in the repatriation of recovered loot to Uzbekistan with the inclusion of ANEEJ and invitation to MANTRA to train CSOs in Kenya and Congo. The MANTRA model ultimately leads to institutional reforms in war against corruption and in asset recovery management



1.3 Overview of project management

MANTRA engaged with 8 civil society organization partners in all geographic zones of Nigeria. The partnership was done through an MOU process with formal means of engagement and reporting on the project. MANTRA also engaged with Government stakeholders through a collaborative effort and MOU process in all activities and reports produced. This stakeholders' endorsed approach was reflected in all engagement designs and processes with the participating CSO and government to validate all MANTRA activities and results. MANTRA also worked with third party vendors engaged through a strict procurement process to aid the achievement of project objectives. (see section on financial management for more details on partner and vendor engagement and activities).



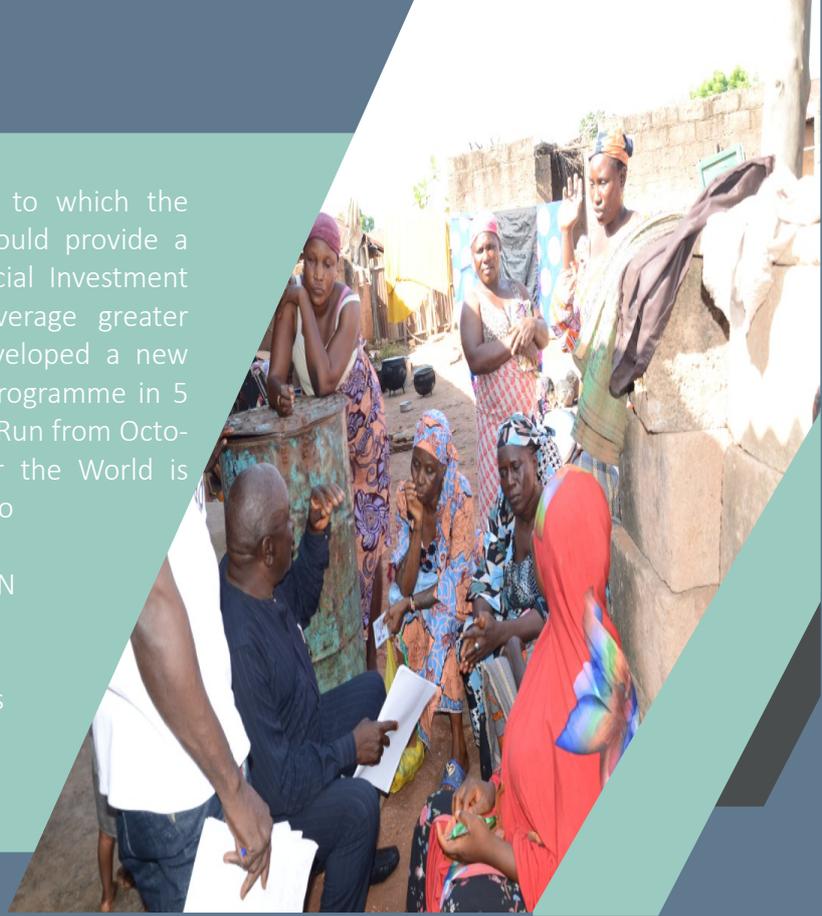
1.4 Responses to Feedback and recommendation from ACORN annual review

MANTRA project responded to FCDO Annual review during the implementation phase 1 and 2 of the project as follows:

The last annual review recommended that ANEEJ should develop appropriate communication lines (both proactive and reactive) to explain their relationship with Government and how they are working to ensure increased accountability and transparency in the management of recovered stolen monies, in consultation with DFID. A communication strategy was developed by ANEEJ and partners which informed further engagement with government. The annual review further recommended that ANEEJ should assess risks and propose mitigation measures for the "Mantra Model" in the run up to elections, particularly managing the delivery of its projects and politicization of the Social investment fund. The ACORN risk register was expected to reflect these risks by 31 March, 2019.

In compliance, ANEEJ reviewed its risk register for the MANTRA project in the build-up to the 2019 general elections. ANEEJ deliberately withheld the report of the field monitoring so as not to influence the electoral process. The report was finally released to the public in May 2019. Also, ANEEJ was advised to translate the data collected in the course of the project to tell a better story through capturing direct feedback from beneficiaries. ANEEJ has done this through the video documentary of some of beneficiaries of the NCTP during the monitoring exercise. During the ACORN Value for Money (VFM) training, ACORN Partners were advised to show complete VFM application in their report. ANEEJ has fully adhered to this as seen in the last quarter report and also evident in this final report.

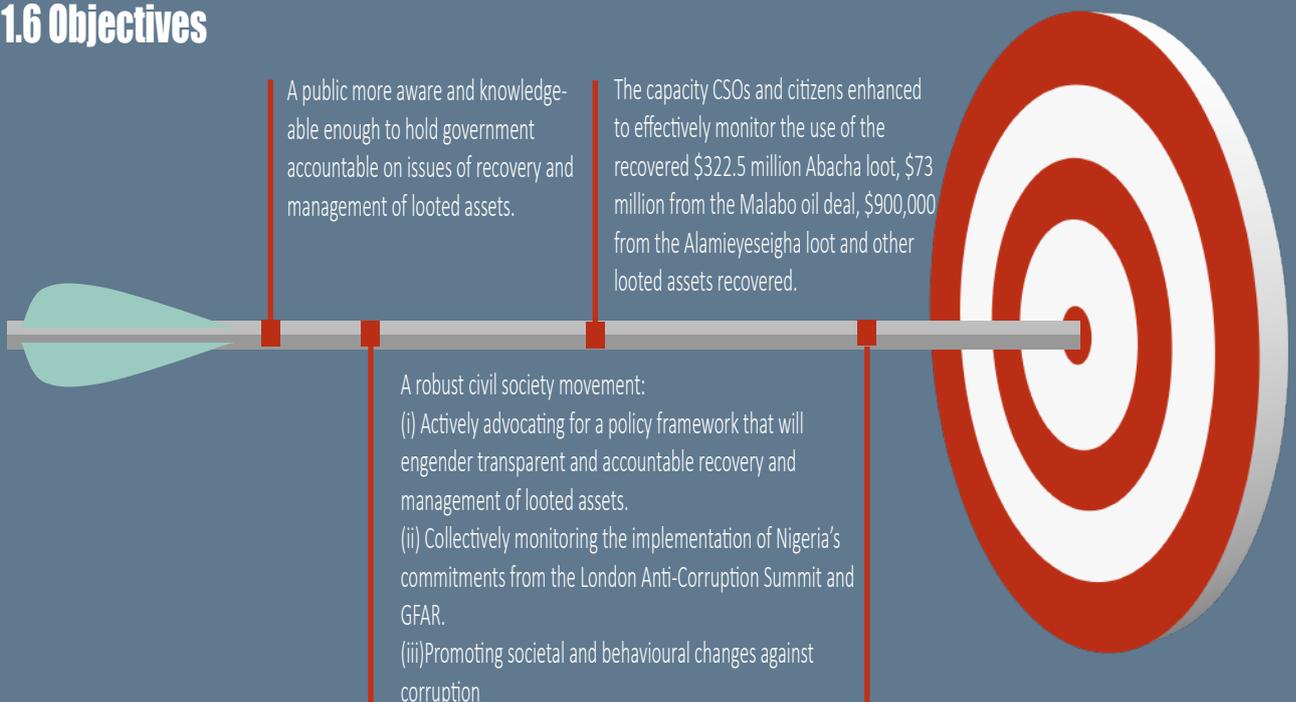
And lastly, FCDO should explore the extent to which the MANTRA Project or this type of approach could provide a suitable entry point to influence broader Social Investment Programmes, beyond Cash Transfers, to leverage greater pro-poor spending in Nigeria. ANEEJ has developed a new proposal titled “Enhancing Social Protection Programme in 5 States of Nigeria (ESPPIN) which is expected to Run from October 2020 to September 2023 and Bread for the World is supporting the project. ANEEJ has made effort to monitor beyond the Cash transfer programme as one of the recommendations from the ACORN 2019 Annual review. ANEEJ is also in discussion with Save the Children for deeper work around Social Protection in the country with more focus on Grievance Redress Mechanism.



1.5 MANTRA Goal

The project is created to achieve the goal of strengthening 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.

1.6 Objectives



1.7 The Geographic area of implementation

ACORN MANTRA PROJECT GEOGRAPHICAL COVERAGE

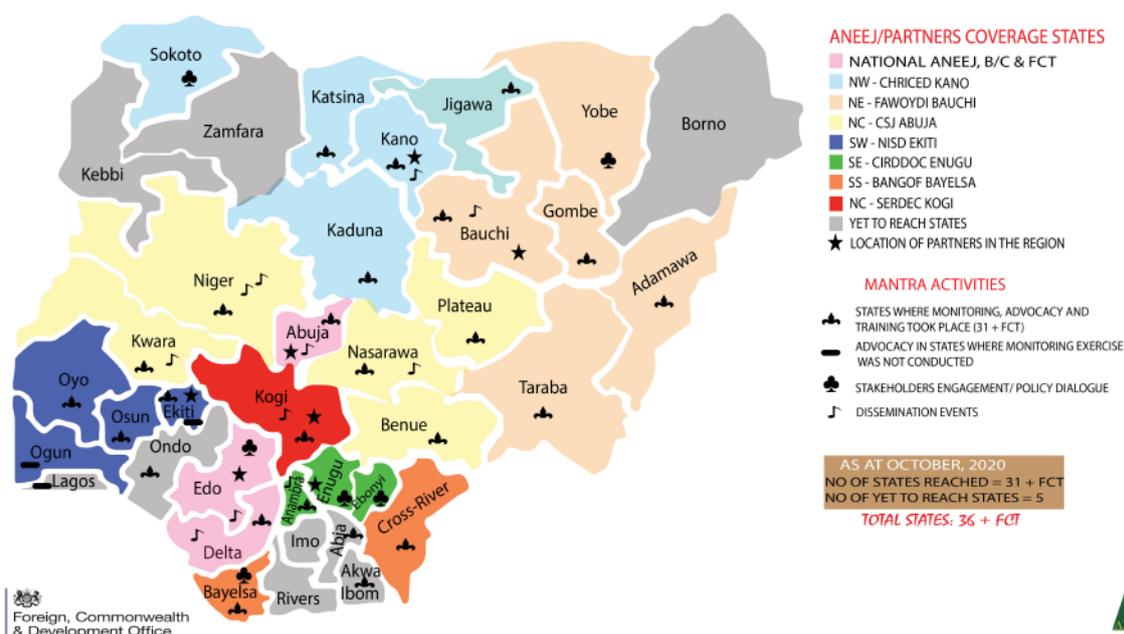


Figure 4: Geographic area of Implementation

2. Category of MANTRA Project Implementation



1. Asset Recovery Management/Institutional Strengthening

ANEEJ began this process by facilitating the pre-GFAR consultative meeting involving different stakeholders which led to the Nigerian and Region CSOs submission at the Global Forum on Asset Recovery (GFAR) organized at the GFAR meeting in Washington DC. ANEEJ led over 10 CSOs in Nigeria to the event which was funded by the seed grant from DFID and Mac-Arthur foundation as an initial take off the MANTRA project. The event gave rise to increase public awareness on the status of Asset recovery in Nigeria as well as other stakeholders’ dialogues on Asset recovery management such as the post-GFAR meeting and others in Nigeria.

ANEEJ, proceeded its engagement with the signing of an MOU with the Federal Ministry of Justice in January 2018 for the monitoring of the \$322.5 million recovered Abacha loot. Thus, establishing a framework for the monitoring of the implementation of the GFAR principles in Nigeria as well as the disbursement of the returned Abacha loot. This led to the establishment of the Asset Recovery and Management Unit (ARMU) which was clearly absent as shown in the MANTRA scoping studies that provides the baseline for the project. The MANTRA project provided technical and institutional support coupled with series of formal and informal engagements. such as strategic meeting with the Head of ARMU on the 1st of November, 2018, with the objective of working on a collaborative plan for establishing necessary policies, guidelines and operational plans for the operation of the unit, pending the passage of POCA. This collaboration was also strengthened with other institutions through advocacy visits to institutions such as NCTO, NASSCO and at state agencies such as SCTU.



Our collaboration equally contributed to strengthening of the grievance redress system leading to some resolved complaints by the beneficiaries of the Conditional Cash transfer programme. ANEEJ engages Edo and Bayelsa State Governments on Open Government Partnership. Edo State Government signed on to Open Government Partnership, becoming the first state in the South-South of Nigeria to so sign onto the global initiative aimed at preventing corruption. Seventeen (17) grievances were successfully resolved in 12 states. This number includes five (5) major independent investigations carried out by MANTRA team in four states. The outcome of report shows the termination of the key officials of the programme such as Head of units, operations, MIS, Desk officer, CTFs, and Grievance Officer involved in fraud. Secondly, original beneficiaries were re-enrolled, beneficiaries were paid their full amount after investigations were conducted, CTF were made to pay back all bribes he forcibly received from the poor beneficiaries.

Thirdly, some of the allegations were baseless and malicious, further investigations were to be carried out in some cases handled among others, while others were recorded during our field monitoring exercise and those reported in the programme directly through the established channels. Refund of N1,000 Naira by community leader illegally deducted from each beneficiary in Dukku Town in Waziri Ward, Dukku LGA, of Gombe state discovered during the MANTRA Spot check conducted in May/June 2020 payment round. This was achieved through the help of DSS. In Ekiti State, MANTRA partner NSID engagement with SCTU contributed to the 92 grievances resolved out of 305 received between the period of March-August 2020. Source: The above claim/information was gotten from the State Grievance Redress Mechanism Manager Olatunbosun O.T Esq. In Bauchi State, MANTRA Partner NISD engagement with SCTU contributed to 62 grievances resolved out of 127 reported cases between the period of 26/12/2018 to 5/05/2020.

a) Legislative Advocacy: On the 5th of November, 2018, ANEEJ facilitated the holding of an Interactive Session between CSOs and the Attorney General of the Federation on the Final Push for the passage of the Proceeds of Crime Bill. The MANTRA project also inaugurated the Anti-corruption Working (AGW) group fast-tracking the progress of the Passage of the Proceeds of Crime Bill and other Anti-Corruption Bills including Whistle-blowers Protection Bill, Mutual Legal Assistance Bill and Money Laundering Bill, amongst others before the National Assembly. Hence, the MANTRA project engaged the executive, legislative and judicial arms of government. This process contributed to the passage of Mutual Legal Assistance Bill into Law and POCA by both Houses of Assembly. Unfortunately, the POCA Bill was not signed by the President into law as at end of project.

b) ANEEJ/MANTRA Intervention in public disagreement on the Utilization and Status of Asset Recovered: ANEEJ Strategically intervened in the public disagreement between the Wife of President Muhammadu Buhari and the Special Adviser on Social Investment Programme (SIP) as the issue was capable of undermining the results achieved by the MANTRA Project and the continuity of the use of returned loot for SIP going forward. ANEEJ advise to the President was obviously adhered to as reflected in the president's Democracy Day Broadcast to Nigerians.⁶

6. <https://guardian.ng/news/aneej-urges-buhari-to-resolve-issues-on-nsip-as-actionaid-lauds-programme/>

ANEEJ MANTRA one-year field monitoring report on the disbursement of the recovered \$322.5-million for Social Investment Programme in Nigeria became a reference point, as the Special Adviser to the President on Social Investment Programme, Hajiya Maryam Uwais, provided data in response to NASS leadership's comment on NSIP. NASS leadership had alleged that the Social Investment Programme was a failure, but this was debunked by Hayija Maryam Uwais quoting MANTRA Field monitoring report copiously.

The Federal Government, through the Senior Special Assistant on Media and Publicity, Mallam Garba Shehu issued an updated Press Release May 13, 2020 on the three key agreed infrastructural projects of returned Abacha \$311.7 million in response to ANEEJ Press Release issued May 6, 2020 and apologized for wrong information to members of the public. The earlier Press Release dated May 5, 2020 by Garba Shehu stated 4 projects namely: Abuja- Kano Road, Second Niger Bridge, Ibadan- Lagos Road and Mambila Power Project. ANEEJ issued a press statement May 6, 2020, stating the three key agreed infrastructural projects with the exclusion of the Mambila Power Project for the public to know the actual projects to be executed.

2.) Increase citizens' engagement, Collective action and awareness and action to resist corruption against looting of Assets;

a) One of the Objectives of the MANTRA project and ACORN programme is to increase citizens action to resist corruption, the MANTRA team began this process through public sensitization and launching of "corruption must not pay campaign" in Abuja at the first year of the project. This campaign was taken down to the state levels leading to media launch of 'corruption not in my DNA' rally organised in different states. This resulted in citizens especially the beneficiaries of the National Cash transfer programme reporting corruption cases in the programme. Also, citizens were on their own, given the massive awareness created by the project were calling for accountability from government on Asset Recovery utilization and management.

The Project launched the "corruption Must Not Pay" campaign in Abuja involving over 100 citizens/CSOs across the country with the message of the campaign duly delivered to FMOJ. There was also the launch of the MANTRA project in Abuja, Kano and Anambra states and the launch of Report on Implementation of the 2015 London Anti-Corruption Summit and GFAR commitments in Nigeria. Marking of the International Anti-Corruption Day events that progressed into #CorruptionNotMyDNA CAMPAIGN celebrated in Kogi and Benin and sensitization workshop for CCT beneficiaries in Kuje, Abuja in 2019 Anti-corruption day event. There were radio jingles to raise awareness, workshop for religious and traditional leaders, Stakeholders Consultative Forum on Social Norms Impacting Anti-Corruption Fight in the North West

Geo-Political Zone, public lectures. The campaign also progressed into citizens behaviour change and value reorientation programme as well as establishment of secondary school anti-corruption clubs in 8 schools in Bayelsa States. And as a result, the MANTRA team was assigned by the ACORN programme to anchor the research of the social norm component of the ACORN programme. A research report titled "Applying Social Norms in Anti-Corruption Programming" was produced.



corruption must not pay campaign Abuja



b) Trainings/Workshops: The MANTRA project started with a training of CSOs for stepping down the OGP process in Bayelsa state. Beneficiaries of the training also included community-based organizations, the Office of the Attorney-General and other relevant Ministries, Departments and Agencies in the State, members of the House of Assembly, professional bodies like the Nigerian Bar Association, amongst others. Other key trainings were the Anti-corruption workshop for religious/traditional leaders with the theme “Changing Social Norms and Behaviors that Promote Corruption: Using Religious/Traditional Institutions as a vehicle.” It brought together religious and traditional leaders from Edo and Delta states. There were also a pilot training in two states, training-of-trainers workshops, and 2 step-down trainings in the 11 and 20 states which equipped all the field monitors for the necessary requirements of the monitoring exercise. Other trainings were capacity Building Workshops for CSOs in the Kwara and Niger states., CSO/NGOs training on Assets Recovery & Management, Quick-Books Training for ANEEJ Finance staff and Financial Management training for MANTRA Partners

c) Monitoring the use of recovered assets and advocating for behaviour change: The monitoring exercise commenced with a pilot exercise on the 26th of October 2018 in two states; Nasarawa and Cross River in order to ensure that the field monitoring of the recovered Abacha loot proceeded efficiently. The National Data Quality Assessment (DQA) was conducted in November 2018 at the NCTO and NASSCO offices. The DQA Process was also repeated at the 11 states and 20 states in the first and second monitoring exercises as well as in the various spot checks carried out.

ANEEJ’s first monitoring exercise held in December 2018 in partnership with 6 regional CSOs who took the lead in their geopolitical zones to engage a total of 41 CSOs, over 500 Monitors and 44 Supervisors were deployed for the exercise across the country. The National Cash Transfer Office (NCTO) confirmed that an initial amount of \$33million of the returned Abacha loot was approved for a period of 6 months from which a total sum of N974,478,000 had been disbursed in 16 states. The states are Adamawa, Anambra, Bauchi, Benue, Cross Rivers, Gombe, Jigawa, Kano, Kaduna, Katsina, Kwara, Kogi, Nasarawa, Niger, Plateau and Taraba. This was the first payment from the returned \$322.5 Abacha loot to the beneficiaries of the Cash Transfer Programme covering the payment schedule for August- September 2018. This was disbursed in October/November, in accordance with the bi-monthly payment of beneficiaries. These facts were made available during the National Data Quality Assessment (DQA) conducted by ANEEJ/MANTRA Partners with the NCTO.

The total number of households currently enrolled under the programme were also disclosed as 297,973. Prior to the National DQA with NCTO and NASSCO, MANTRA partners had also embarked on state level engagements in the different states where the partners are located. There were series of independent investigations in partnership with NCTO to Osun Gombe, Anambra and Edo States. Various spot checks on grievances and payment points were carried out by MANTRA partners at different states. There were 2 major upstream monitoring of the returned \$322.5 million of the Abacha loot. Five downstream monitoring rounds were carried out, which include: 14 field beneficiary survey and spot checks as well as 22 grievance monitoring, making a total of 36 field exercises across 31 States and the FCT on the disbursement of the looted assets during the reporting period. Feedback was collated from 77,753 beneficiaries in 4547 communities.

MANTRA project also undertook monitoring of the UNCAC, GFAR and London anticorruption summit commitments in Nigeria. This included activities to assess progress on outcomes on policies and regulations on recovered assets in Nigeria, Tracking of MANTRA stakeholder engagement activities, outcomes and lessons learnt. Various reports were produced.

d) Coalition Building: At the onset, MANTRA project began with 6 CSOs as downstream partners in each of the six geo-political zones. This eventually increased to 8 partners and 1456 civil society Organisations and individuals made up of 959 males and 492 females involved in the MANTRA Project monitoring, down to the grassroots level to build a sustainable coalition of citizens around issues of asset recovery and monitoring and tackling petty corruption around the Social Investment Programme of the Federal Government through the Grievance Redress Mechanism. New organizations and individuals also joined the Nigerian Network for Stolen Asset Recovery during the field monitoring exercise. This coalition building also led to partnership with other institutions internationally.

e) Collaboration between MANTRA Partners and other Stakeholders

ANEEJ-MANTRA participated in series of DFID meetings conducted in Abuja and at regional Level organized in Enugu. These meetings include: programme reviews, ACORN steering committees among others. ANEEJ also held various partners meetings for MANTRA partners. MANTRA team also attended various Government organised events and other CSOs meeting with respect to Asset Recovery. For example, ANEEJ-MANTRA participated in the Africa Union Anti-Corruption Day Programme organised by ICPC as a panelist sharing experience of the monitoring of recovered Abacha \$322.5million loot for the poorest of poor Nigerians. ANEEJ also participated in a similar event organised same day by the EFCC.

ANEEJ was also one of the panelists at the HEDA Conference on Agenda Setting for Citizens interaction with recovered Assets, made Presentation on the Role of Civil Society and Media in influencing social protection in Nigeria (National and State context) at Social Protection Orientation Workshop for Zamfara State New Legislators-Friday 5th July 2019, among other events.

3) Dissemination Event at National and International Level

a) ANEEJ has attended various international meetings on Asset Recovery through the MANTRA project and also organized side events and made several submissions to strengthen the global frame work on Asset Recovery. ANEEJ participated in the GFAR meeting in Washington, the 18th International Anti-Corruption Conference (IACC) in Denmark, in Addis Abba 1 and 2. ANEEJ participated and made submission to the guidelines on stolen Assets and Human Rights virtual consultation. The project then progressed to organise a side event at 2019 Global Open Government Partnership summit in Ottawa, Canada, 21-25 May, 2019. The session titled: Asset Recovery in OGP: Peer Learning on Recovery, Return and Monitoring- Lessons from the field, was moderated by Patricia Adams, Executive Director, Probe International, Canada with six key speakers.

Also, ANEEJ in collaboration with Bank Information Centre (BIC), Washington DC and the International State Crime Initiative, UK organized a side event featuring panel discussions on the World Bank and Asset Recovery at the annual meetings held 18 October, 2019 and ANEEJ side event at the 8th session of the conference of the states' parties to the united nations convention against corruption held at Dhabi, United Arab Emirate held on Thursday, 19th December, 2019. topic: utilisation of recovered assets for the realisation of SDGs.

ANEEJ and CIFAR also co-organized a panel discussion on the role of international agencies in asset return schemes during the virtual meeting of Illicit Financial Flow (IFF) Global Forum held 2-3 September, 2020. ANEEJ and other MANTRA Partners made submission to 2021 UNGASS government, standing as the only African CSO to do so. An initiative of the UN General Assembly Special Session (UNGASS) against corruption scheduled for 26 to 28 April 2021. ANEEJ and its MANTRA partners made recommendations to enhance asset return and accountable use for victims of corruption. ANEEJ has equally submitted an update on MANTRA session for the 19th IACC based on the COVID-19 Pandemic and related corruption consequences at the request of the International Anti-Corruption Conference (IACC). And Registered and made MANTRA submission to FACTI panel for the FACTI Africa regional consultation scheduled for 18 November 2020. The high-level Africa regional consultation is co-hosted by the FACTI panel and United Nations Economic Commission for Africa. ANEEJ and CIFAR to co-organized a panel discussion on the role of international agencies in asset return schemes during the virtual meeting of Illicit Financial Flow (IFF) Global Forum held 2-3 September, 2020. *ANEEJ/MANTRA Participation in the case-Study Research on DFID International Action Against Corruption (IACT) programme- 21 May, 2020.

B) Research and Evidence: Over 76 key documents were produced comprising Programme reports, Baseline reports, research and policy briefs, monitoring reports, Monitoring and Evaluation reports and Newsreels, Updates and fliers. ANEEJ MANTRA one-year field monitoring report on the disbursement of the recovered \$322.5million for Social Investment Programme in Nigeria became a reference point, as the Special Adviser to the President on Social Investment Programme, Hajija Maryam Uwais, provides data in response to NASS leadership's comment on NSIP. NASS leadership had alleged that the Social Investment Programme was a failure, but this was clarified by Hajija Maryam Uwais.

Secondly, The Senior Special Assistant to the President on Digital and New Media, Tolu Ogunlesi used ANEEJ report for a twitter conference within the period of 10-30th April, 2020. The presidential aid used the data from the monitoring report to stimulate public discourse around the utilization of the Recovered Abacha \$322.5 million loot in Nigeria. Poor Nigerians Received N23.7billion From Recovered \$322.5million Abacha Loot-MANTRA Report, 23 April, 2020

Thirdly, the STAR initiative shared ANEEJ/MANTRA invitation leaflet on the presentation of the Summary report of the January-April 2020 disbursement to beneficiaries of the National Cash Transfer and FAQ of the NCTO on its Twitter page.

3. Impact of COVID-19 Pandemic on MANTRA Project

The Impact of the COVID-19 pandemic resulted to some programmatic changes in the implementation of the MANTRA project such as the review of MANTRA Work plan. ANEEJ and its partners reviewed the project's work plan which led to realignment of the earlier scheduled activities for quarter 4 of year 1, as well as year 2 and 3 activities/budgets which received FCDO's approval. The MANTRA work plan was also reviewed to concentrate more on media related activities for the first and second quarters covering April -September 2020. Some of the activities involving gathering of the large group of people were conducted virtually.



Image of the participants during the FGD meeting

ANEEJ Updated project's and organisational Risk Matrix and Health policy, Development of business plan to reflect the effect of the COVID-19, developed a COVID-19 guideline for its staff and partners, Developed Evaluation tool sent to MANTRA partners to get their feedback on how they are responding to COVID-19, Engaged in distribution of COVID-19 prevention materials to CCT beneficiaries, organized town hall meetings on grievances, Focus group discussion on the impact of payment on CCT beneficiaries across the states as well as advocacy and beneficiary survey to states left out of payment at the beginning of 2020 in outbreak of the covid-19 in March 2020. MANTRA Partners across the different geo-political zones embarked on COVID-19 activities such as public awareness on COVID-19. Early closure of the ACORN programme/MANTRA project impacted negatively on the project.

4. M&E Activities, (MANTRA log frame, Results achieved)

MANTRA project began with the setting up of an M&E system for the project. At the initial stage, two consultants were engaged namely; Nicholas Atampugre and Wunmi, Asani. The Consultants were tasked to assess ANEEJ M&E systems and developed the MANTRA monitoring and Evaluation framework for the project. The team was led by Nicholas Atampugre also conducted a key informant interview with key officials in the relevant institutions.

The M&E activities were later handled by one consultant, Dr. Wunmi Asani till the end of the project. She supported the MANTRA team in the design, review, data collection/collation, analysis and collation of evidence of programme data across departments in the organization.

The ACORN log frame was later reviewed to enable a reflection of MANTRA project expected outcomes. This was eventually completed in September 2020. In addition to collating data on the project log frame outcomes, monitoring activities of the project included:

01

Five monitoring rounds which includes 14 field beneficiary survey and spot checks as well as 22 grievance monitoring, making a total of 36 field exercises across 31 States and FCT on the disbursement of the looted assets during the reporting period. Feedback was collated from 77,753 beneficiaries in 4547 communities.

03

Monitoring of the UNCAC, GFAR and London anti-corruption summit commitments fulfillment in Nigeria. This included activities to assess progress on outcomes on policies and regulations on recovered assets in Nigeria.

02

Two (2) Upstream monitoring exercise (Audit) and field visits for the monitoring of the systems and verification of the data generated by the agencies involved in the disbursement of the looted assets at National level and in 31 States and the FCT.

04

Tracking of MANTRA stakeholder engagement activities, outcomes and lessons learnt



Progress against LF outcome and outputs

OUTCOME 1: Evidence of organized citizen's actions supported by ACORN programme towards resisting corruption and enhancing anti-corruption efforts

Table 1: Progress of Project Log frame outcomes

Nos	Outcome Indicator	ANEEJ Milestones	Results
OC1	Evidence of organized citizen's actions supported by ACORN programme towards resisting corruption and enhancing anti-corruption efforts	124 organized citizens actions by 2020	178 organized citizens actions identified at National level and in 31 States ⁷ and the FCT
OC2	Evidence of implementation of strengthened mechanisms by ACAs and other public institutions on recovery of looted assets and their management.	<p>Milestone 1</p> <p>At least 4 reforms identified by 2018, and 20% of identified institutional reforms implemented in Asset Recovery Management by 2019 and 2020</p> <p>Milestone 2</p> <p>40% of recovered assets from global communities allocated and 15% utilized for the benefits of the citizens.</p> <p>Milestone 3</p> <p>Increased support for implementation of commitments in Nigeria (UNCAC, GFAR principles and London Anticorruption Summit) by relevant stakeholders (3 MDAs and 1 legislative)</p>	<p>72% of required institutional reforms identified in the project was fulfilled (22 reforms identified, 16 fulfilled)</p> <p>66% of recovered assets from the global communities during the life of the project allocated to projects for the benefit of the citizens of Nigeria</p> <p>At least 21% of total recovered funds that arrived during the life of the project utilized for the benefit of the citizens</p> <p>Increased support for GFAR and London anticorruption summit commitments by 2 legislative houses (Federal and Edo State) and increased fulfillment of asset recovery related anticorruption commitments in Nigeria</p>

Outcome 1 Milestone: 124 organized citizens action by 2020

MANTRA carried out over 178 organized citizens' actions⁸ in 31 states and FCT of the country. Further break down of the organized citizens' action demonstrate the type of action undertaken. The full list and disaggregation by type can be seen in the annex section. See the full list in the Annex

⁷ See Annex for the list of citizens actions carried out by MANTRA on anticorruption as at EOP and the type of activity
⁸ https://drive.google.com/file/d/1ReYYnRzb6h33_KYtQhod8otjproUJRSl/view?usp=sharing

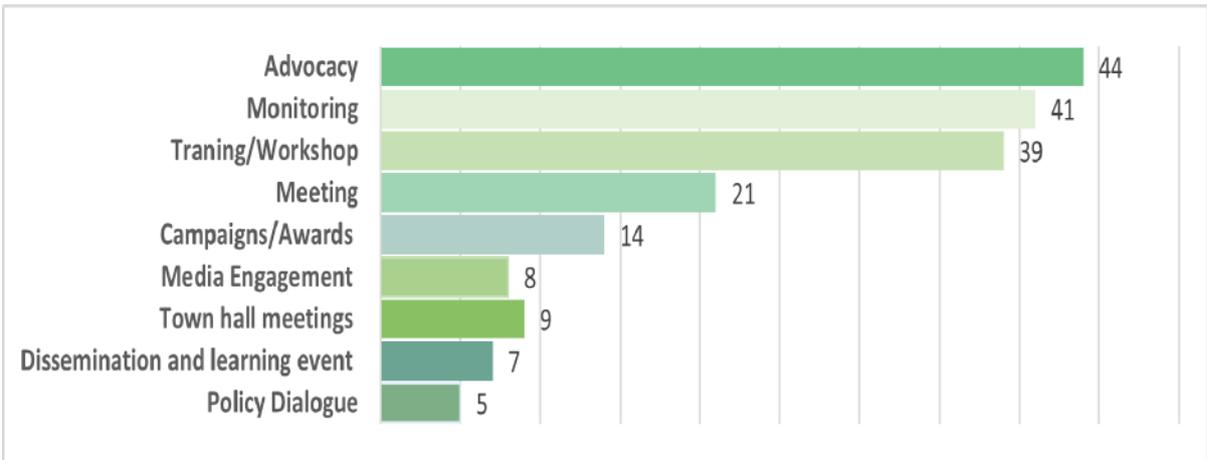


Figure 5: Chart showing frequency of organized citizens' action by category

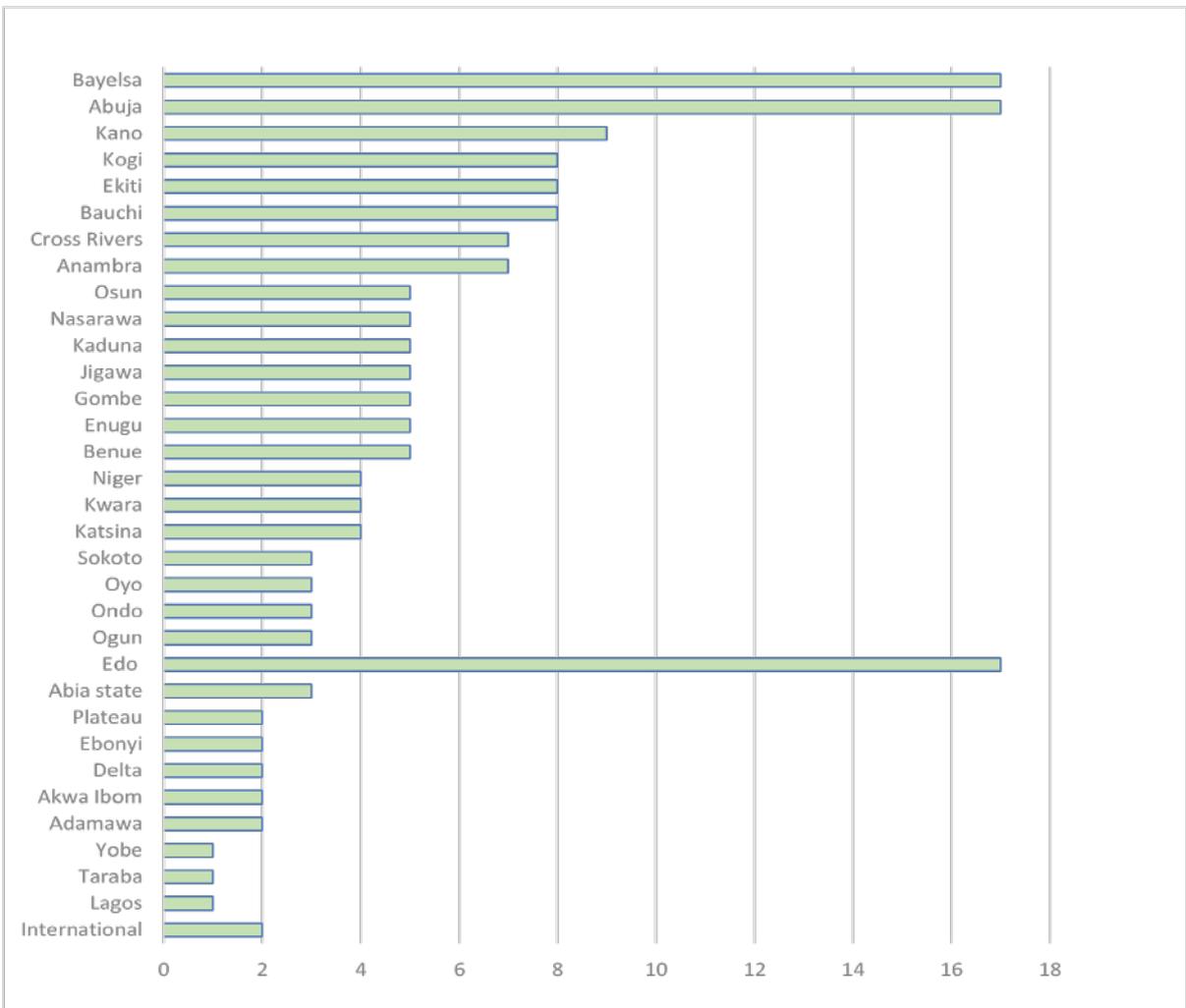


Figure 6: Image showing frequency of organized citizens' action by location

OUTCOME 2: Evidence of implementation of strengthened mechanisms by ACAs and other public institutions on recovery of looted assets and their management

Outcome 2 Milestone 1: At least 4 reforms identified by 2018, and 20% of identified institutional reforms implemented in Asset Recovery Management by 2020

22 institutional reforms were identified from 2018 baseline study on required activities to meet GFAR and London anti-corruption commitments in Nigeria, and MANTRA monitoring reports. 16 (72%) of the identified reforms required were achieved:

The types of institutional reforms identified can be classified as:

- I. Reforms in regulations and Laws (6)
- II. Reforms in institutional frameworks (or systems) (6)
- III. Reforms in organizations activities (5)
- IV. Reforms in reporting tools and templates (5)

The required institutional reforms identified and achieved are listed in

Table 2: List of Institutional reforms identified and achieved in the MANTRA project below, the reforms not achieved are seen in red text below.

institutional Framework	Organizations Activities	Regulations and laws	Tools and templates
ARMU to be strengthened	innovations in asset recovery management	Official Gazette on "Regulation on tracing, Recovery and managing Asset published by the Federal Government	State and ward level report and total paid
Nigeria to link use of funds and internationally recognized objectives like repairing damage done by corruption and developmental goals	Early Information to beneficiaries on disbursement	Guidelines for asset recovery	Reporting format for PSP
Prosecution of corrupt staff identified	Electronic payment	Guidelines needed for PPP	Date stamp for archive
Establishment of multilateral institutional framework that establishes a forum for transferring and receiving countries to negotiate and agree on asset recovery that is mutually beneficial to both parties	Late hours at disbursement site		Record keeping at the SCTO, LGA and ward
Framework for early and continuing dialogue with confirmed and potentially receiving countries to enhance quicker and more effective asset recovery arrangements	Reporting to the general public	NFIU and mutual legal assistance bill	Data change management processes
	Return of Assets in a case specific manner	POC bill passed by NASS Assembly but not assented to by the president	

Outcome 2 Milestone 2: 40% of recovered assets from global communities allocated and 15% utilized for the benefits of the citizens

6 recovered assets were repatriated to Nigeria during the life of the project

However only 4 (66%) repatriated funds were assigned to a specific use during the life of the project. The Alamiyeseigha repatriated funds was originally planned for building judges' quarters by the State Government but was eventually agreed to be utilized for primary health care for the people of the State as an outcome of MANTRA grassroots CSO (Bayelsa NGO Forum) advocacy efforts.

All four repatriated funds were eventually allocated to be utilized for projects for the benefit of the citizens in line with the SDG goals . See Table 3.

However, actual disbursements have occurred so far with only the Abacha 2 repatriated funds. This commenced during the life of the project and \$148 million (46%) has been spent So far from the Abacha 2 funds. This means only 21% of recovered assets which arrived in the country has been utilized¹⁰. The Abacha 2 has been utilized to pay 950,783 vulnerable households through the country's social protection programme in 32 States in Nigeria as at August 2020.



Figure 7: Consensus reached on Utilized Recovered assets

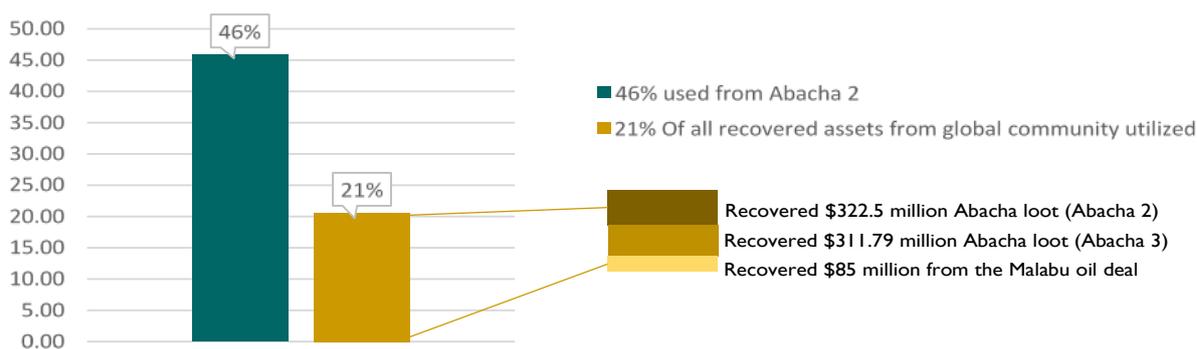


Figure 8: Chart of recovered assets already expended

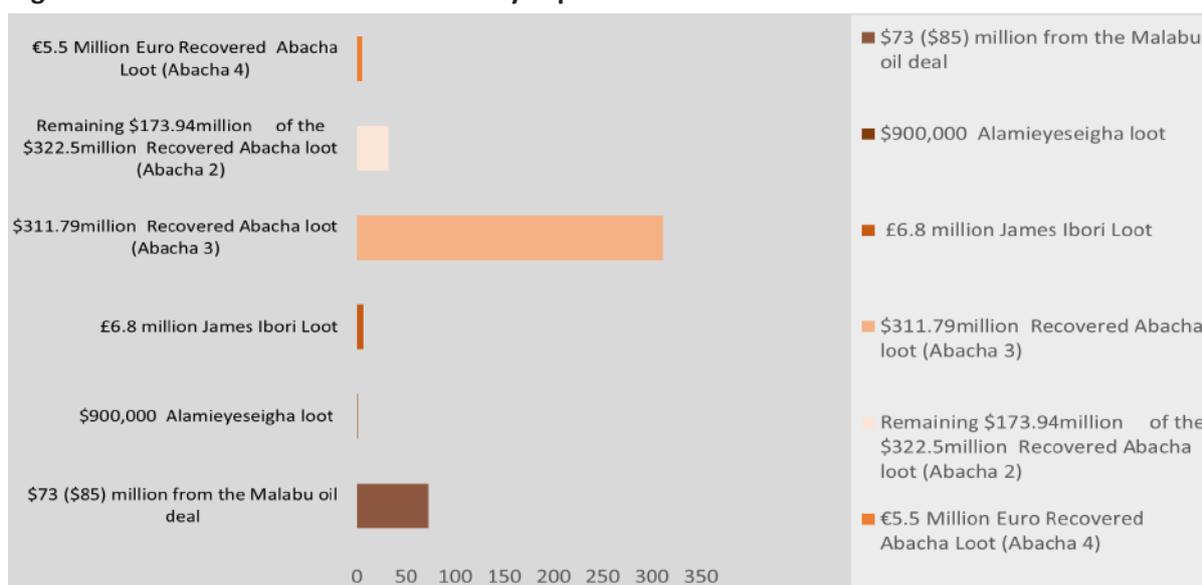


Figure 9: Chart Showing 6 recovered assets

Table 3: Details of repatriated funds to Nigeria

S/N	funds expected to be repatriated	Amount expected	Amount arrived	Purpose allocated for	Amount Utilized September 2020
1	Recovered \$321 (\$320 million Abacha loot (Abacha 2)	\$321 million	\$322.5 million (\$322,515,931.83)	Disbursement to vulnerable in SIP	\$148,5 (\$148,552,099)
2	\$73 (\$85) million from the Malabu oil deal	\$73 (\$85) million	\$85 million	Not allocated	Nil
3	\$900,000 Alamieyeseigha loot	\$900,000	Not Yet	Building of PHC	Nil
4	£6.8 million James Ibori Loot	£6.8 million	Not yet	Not allocated	Nil
5	\$311.79 Recovered Abacha loot (Abacha 3)	\$308 million	\$311.79 (\$311,797,866)	Infrastructure: Roads	Nil
6	€5.5Million Recovered Abacha Loot (Abacha 4)	€5.5Million	Not yet	Infrastructure: Roads	Nil



Outcome 2 Milestone 3: Increased support for implementation of commitments in Nigeria (UNCAC, GFAR principles and London Anti-corruption Summit) by relevant stakeholders (3 MDAs and 1 legislative)

There has been increased support and fulfillment of 4 of the GFAR commitments identified, 3 Nigerian London anti-corruption summit commitments and 1 UNCAC commitment in the 2 MDAs (National Cash Transfer Office and the Ministry of Justice) and 2 legislative houses. the Legislature at National and Edo State.

The GFAR, London anti-corruption summit and UNCAC commitments fulfilled are seen below

Table 4:GFAR commitments with increased fulfilment

Commitment 4 Transparency and accountability in the return and disposition of assets and Commitment 9: Preclusion of benefit of offenders involved in the commission of corrupt offences	Commitment 6 Strengthening anticorruption efforts to achieve development Goals	Commitment 8 Disposition of confiscated proceeds of crime in Nigeria in a case specific manner
POC bill passed by NASS	Use of recovered assets for the citizens in line with SDG successful, Bayelsa State government assigning the utilization of the Alamiyeseigha funds to the health sector instead of the initial Judges Quarters	Recovered assets in the country over the life of the project was done in case specific manner
Reporting templates developed and utilized by the NCTO	Agreement between Delta State and the Federal Government on who takes ownership of the utilization of the 6.8 million Pound James Ibori Return Loot.	
State level reporting ensured in the Cash transfer programme	Paying out Abacha 2 to the vulnerable in the National Cash transfer programme	
Increased resistance to corruption (deduction, removal of names etc.) in the NCTO	Utilizing Abacha 3 and 4 for infrastructure development	
Improved disaggregation of NCTO data to demonstrate persons reached at community level		
Refund of money illegally deducted from CCT beneficiaries in Gombe State		
Removal of public officials involved in corrupt practices in Gombe, Osun, Anambra, Edo and in other states through ANEEJ independent investigations as well as reported by others CCT beneficiaries		
Continuous improvement of systems to aid detection of corrupt acts global demand for a human right approach through strengthening Guidelines on Stolen Asset Recovery and Human Rights (OHCHR and ANEEJ/MANTRA submission to the UNGASS process and facilitation of Nigeria CSOs		

Table 5: Nigeria's London anticorruption summit commitments fulfilled during the life of the project

Commitment B: Preventing Facilitation of Corruption:	Commitment G: Asset recovery, Asset return and transparent management of returned asset	Commitment L: Support Innovations in the use of Technology to fight corruption	Commitment: Exposing Corruption/ Beneficial Ownership Transparency
	Introduction of unexplained wealth orders through executive orders in line with Nigeria commitment G1 fulfilled ¹¹	Development of innovations in the use of technology to fight corruption was supported by MANTRA in the FMOJ	Creation of beneficial Ownership Register by NEITI
Guidelines for private and public partnership developed	POC bill passed by NASS		
Data disaggregated in NCTO by communities	Guidelines for ARMU developed and ARMU established in the FMOJ	Central database for Asset Recovery, Management developed by FMOJ through MANTRA engagement and institutional support	
Reporting templates developed and utilized in the NCTO	Official Gazette on "Regulation on tracing, Recovery and managing Asset published by the Federal Government		
State level reporting ensured in the Cash transfer programme	Central database for Asset Recovery, Management developed by FMOJ through MANTRA engagement and institutional support		
Passage of NFIU and Mutual Legal Assistant bill into law through the inauguration of the Advocacy working group on Anti-Corruption Bills involving key stakeholders such Chairman Senate Committee on Anti-corruption bills in the 8th Assembly	Global demand for a human right approach through strengthening Guidelines on Stolen Asset Recovery and Human Rights (OHCHR).		
Global demand for a human right approach through strengthening Guidelines on Stolen Asset Recovery and Human Rights (OHCHR)			

UNCAC COMMITMENT Fulfilled

Promote active participation of civil society and non-governmental organizations in the prevention of and fight against corruption including by measures such as enhancing the transparency of and promoting the contribution of the public to decision making processes, ensuring effective public access to information and promoting and protecting the freedom to seek, receive and publish information concerning corruption.

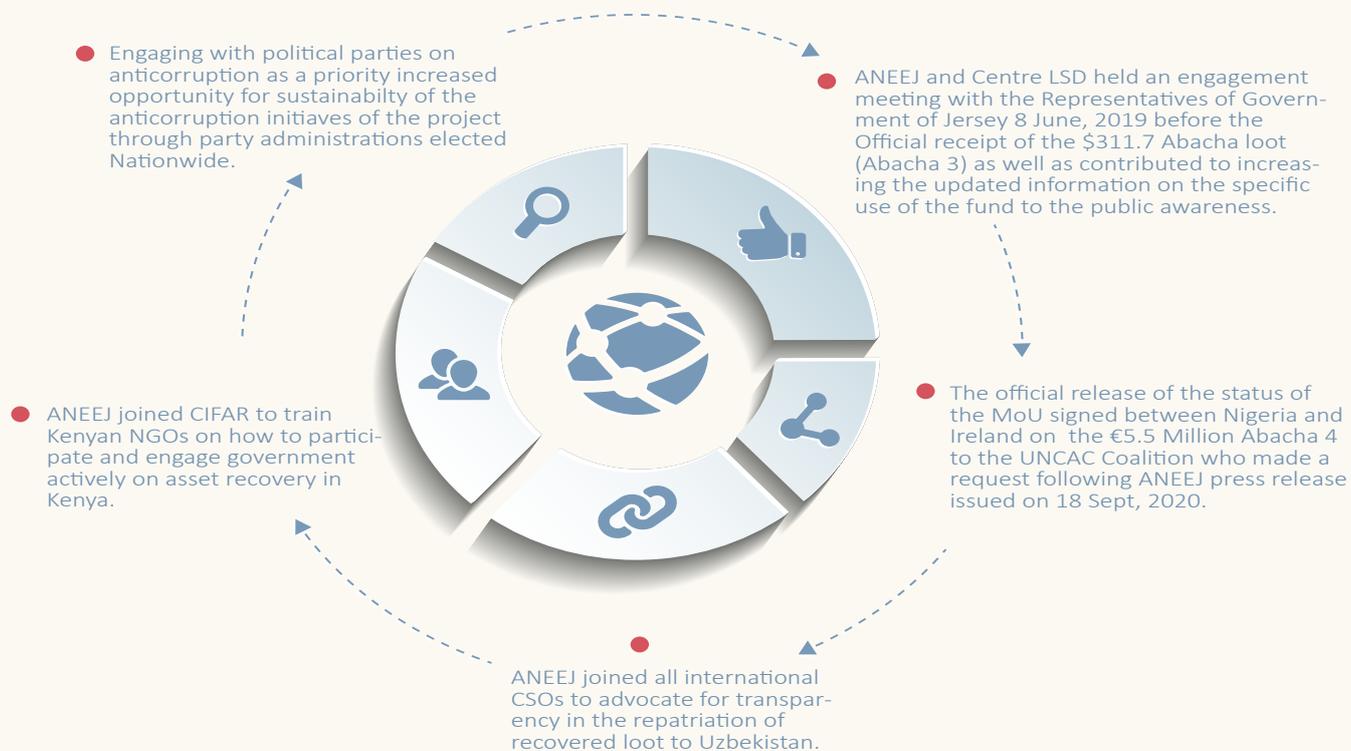


Figure 10: UNCAC Commitment Fulfilled

Output 1: The results under output 1 demonstrate the outcomes of project efforts to strengthen government institutional frame work, systems and policies as a means to reduce corruption in the management and utilization of recovered assets. MANTRA project results achieved against the log frame indicators at EOP are seen in the table below.

Table 6: Table showing results achieved under output 1

Nos	Output Indicator	Milestone	Results
1.2	Indicator 1.2: Extent of development and implementation of key legislations, guidelines and monitoring & evaluation on anti-corruption and asset recovery (e.g. proceeds of crime bill).	4 of GFAR principles/London Anticorruption Summit commitment which inform guidelines/ regulation, activities for ARMU/MDAs/ Legislative arm of government ANEEJ 7 field monitoring of returned Abacha \$322.5M loot / spot checks conducted ANEEJ	4 GFAR principles,3 London anticorruption summit commitments inform guidelines/ regulation, activities for ARMU/MDAs/ Legislative arm of government ANEEJ 36 beneficiary experience, grievance monitoring and spot checks conducted

Output 2: The interventions to strengthen citizens for behaviour change towards corruption are listed in this section. (See annex for the full list of interventions and disaggregation by type).

Table 7: Table showing results achieved under output 2

Nos	Output/Outcome Indicator		Results
2.1.1	No. of interventions strengthening citizens' networks for promoting transparency and curbing corruption in the public spaces	194	210
2.1.2	No. of key influencers/groups motivated and engaging in dialogues to promote principles of Integrity (ethics, morality, character building etc.)	1005	10/1520
2.1.3	Number of citizens participating in dialogue forums; grievance mechanisms and events supported by ACORN programme to promote integrity and honesty in public life.	4505	5332
2.2.1	Number of trained youth-focused groups/youths who create awareness on social norm change, public intolerance and support in the fight against corruption.	864	925 youths/ 35 youth groups trained
2.2.2	Number of youth groups informed by ACORN programme and are engaging constituencies/state actors on anti-corruption practices to promote integrity and accountability.	23	35
2.2.3	Number of groups/individuals actively engaging in media discussions on anticorruption via social and other electronics media activities.	ANEEJ – 42,291 likes; 36,219 shares; 3,205 comments; 9,800 tweets	13,0298,978

Outcome 2.2.1 The interventions to strengthen citizens networks in the project included trainings and workshop, town hall meetings, stakeholder meetings, media briefing, advocacy, campaigns, policy dialogues and monitoring. These activities were conducted with diverse Stakeholder groups in 31 States plus FCT and in 3 international countries (Ottawa Canada, Abu Dhabi, UAE and Washington DC).

Outcome 2.1.2. 1520 individuals were engaged in 8 influencer stakeholder groups during the life of the project as seen below:

- I. CSO
- II. Political parties
- III. Students and youth groups
- IV. Traditional
- V. religious leaders
- VI. Media
- VII. Beneficiaries of the Cash transfer programme
- VIII. Community members
- IX. Advocacy Working Group (National Assembly Members, ARMU, OGP secretariat)
- X. National Cash Transfer Officers (National Coordinator, Head of Unit, Desk officers and Community Transfer Facilitators

Engagement of these constituencies on the demand side contributed to the outcomes of the project.

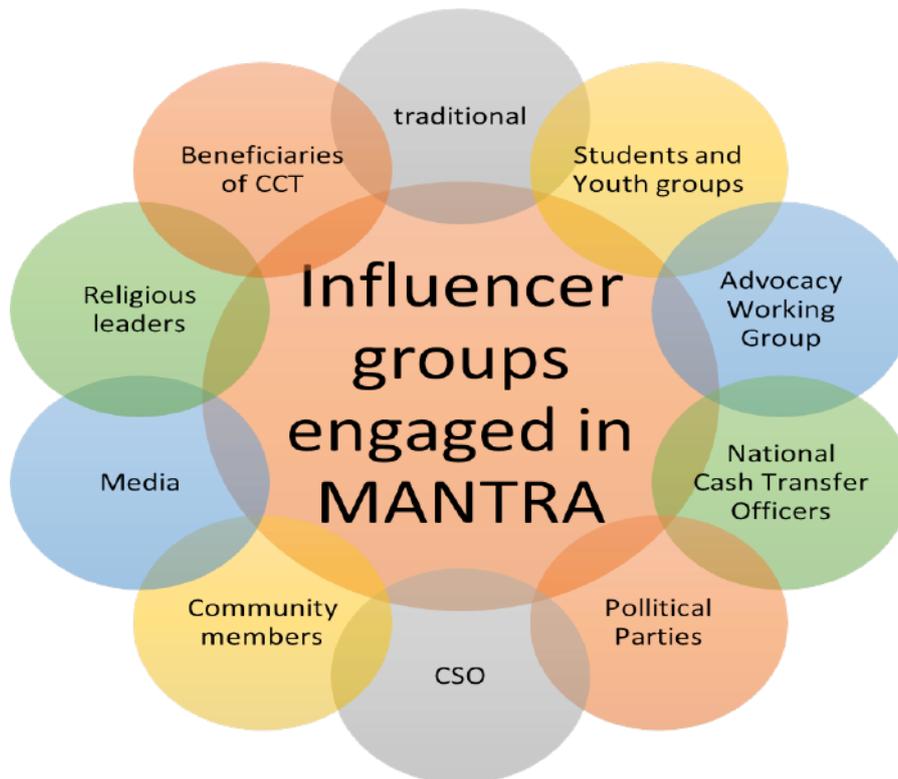


Figure 11: Influencer groups engaged in MANTRA

2.1.3 Number of citizens participating in dialogue forums; grievance mechanisms and events supported by ACORN programme to promote integrity and honesty in public life.

5,332 Citizens participated in MANTRA supported events in 31 States plus FCT in Nigeria and in 3 international countries (Ottawa Canada, Abu Dhabi, UAE and Washington DC) to promote integrity and honesty in public life. However, some of these individuals attended multiple ACORN events across diverse States

These events include:

- **Town hall meetings**
- **Policy dialogues**
- **Stakeholder dialogues**
- **Dissemination events and media engagements**
- **Grievance monitoring activities**
- **Focus group discussions on behaviour change**
- **Advocacy visits**

2.2.1: Number of trained youth-focused groups/youths who create awareness on social norm change, public intolerance and support in the fight against corruption

MANTRA engaged youth constituencies in the life of the project on anti-corruption efforts and trained 925 youths of which 764 youths were engaged in the monitoring activities in 31 States plus FCT. While a total of 260 students were trained at Secondary Schools (catch them young) on anti-corruption efforts.

Outcome 2.2.2: Number of youth groups informed by ACORN programme and are engaging constituencies/state actors on anti-corruption practices to promote integrity and accountability

35 youth groups trained by MANTRA participated in MANTRA monitoring activities in 32 States (including the FCT). The eight Student groups with a total participation of 260 students recently trained will begin to engage other youths on anti-corruption events in their different States as they now established anti-corruption Clubs as a Sustainable platform.

Output 2.2.3: Number of groups/individuals actively engaging in media discussions on anti-corruption via social and other electronics media activities.

A total of 13,029,978 engagements on MANTRA messages occurred on social media, these include

-  Facebook engagements - 9,789,209
-  Facebook reactions - 982,789
-  Twitter impressions - 2, 257,980

However, MANTRA had an overall estimated reach of 39,766,119. Out of which the estimated social media reach was 19,766,119 and broadcast (TV, Radio) viewing reach was 20million over the life of the project

SOCIAL MEDIA VIEWING REACH:

 Facebook: 13,235,462
(including livestreaming views of 705,854)

 Youtube: 652, 239

 Instagram: 726,580

 Twitter: 5,857,692

Estimated Television Reach (Channels, AIT, NTA, ITV, EBS, TVC etc) - over 20M people

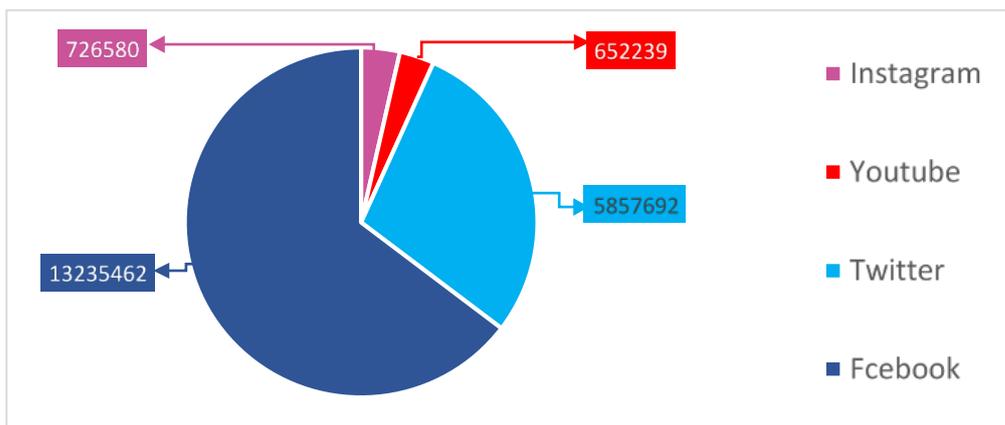


Figure 12: Chart showing social media reach of MANTRA messages on different social media channels

OUTCOME 3: Updated evidence on corruption to stimulate public discourse and ensure the continued relevance of the programme coherency and effectiveness of UK support by coordinating HMG AC intervention

Table 8: Table showing results achieved under output 4

Nos	Output/Outcome Indicator	Milestone	Results
3	Updated evidence on corruption to stimulate public discourse and ensure the continued relevance of the programme coherency and effectiveness of UK support by coordinating HMG AC intervention		
3.1	Quantity of reportage that bring corrupt acts of individuals or institutions to the fore and promote values, gains and invaluable rewards of integrity and transparency.	259	272
3.2	Number of ACORN strategic partners' consultation events and quality of documentation/tools promoting stakeholder coordination and coherence.	15	25
3.3	Number of public events supported by ACORN that stimulate discussion using evidence on corruption issues generated by the programme	30	114
3.4	Number of groups/individuals reached through ACORN support that developed anti-corruption contents on information sharing/ web platforms.	10/ 154770	11/250,327

The project engaged constituencies via online, print and social media with information and messages to improve coverage of the project anticorruption demands and results over the life of the project.

5. Financial management



ANEEJ undertook due diligence of all partners before engagement to affirm their suitability and capacity with appropriate statutory requirements. A team of two qualified staffs visited all partners before to administered standardized questionnaire and physical inspection before signing of agreements.

Moreover, in an effort to strengthen financial systems of partners, ANEEJ organized a financial management training where partners were required to delegate responsible finance and program staff to ensure the capacity of related staffs are built to reach requirements of both financial and narrative reporting. This activity is key as financial management remains a major challenge in local civil society organizations.

Also, to promote sustainability of the project after FCDO funding, ANEEJ organized a training webinar for partners on social entrepreneurship as a tool towards sustainability of project outside donor funding. This is expected to reduce reliance on donor funding for sustainability of critical ongoing initiatives. ANEEJ undertook quarterly review of partners financial systems, where all financial documents are vetted, observations raised and feedback received. ANEEJ keeps the original financial documents of partners which are forwarded on quarterly basis. Under the MANTRA project of the ACORN programme, an initial amount of £684,897.88 was granted to ANEEJ before a reviewed amount of £1,968,429.85 to bring the project to a close in January, 2021.

Prior to the commencement of the project, Carora Consult, Accra, Ghana/ Nobel Perspective, Abuja effectively utilized £16,960 to develop appropriate M & E framework, approach and methods for the project, plans and methodology for data collection, management and analysis as well as the reporting and utilization of information, also to review, and enhance the MEL system of ANEEJ. Noble Perspectives further used £35,106.38 (N16,500,000) to develop all M and E tools for the monitoring of returned \$322.5million Abacha loot, carried out training of 2 trainers (TOT) for MANTRA field monitors, as well as Data Quality Assessment training for MANTRA field monitors. An additional sum of £31,914.89 (N15,000,000) was paid to the M&E consultants Dr. Omowunmi Asani bringing it to a total sum of £67,021.27 (N31,500,000) for the overall M&E support provided. With a support of about £21,489.36 (N10,100,000), the Asset Recovery and Management Unit (ARMU) successfully developed the Central database for Asset Recovery, Management officially launched by Federal Government Sept 17, 2020 and the Official Gazette on "Regulation on tracing, Recovery and managing Asset published by the Federal Government in 2019."



Financial Management Training with Partners



5.1 Value for Money

The project utilizes several approaches to ensure value for money on the MANTRA project implementation. These include:

1. Compliance with procurement policies in vendor or services selection
2. Staff cost sharing
3. Cross programme partnership
4. Savings on Schedule of the Monitoring Exercise
5. Savings on Logistics as a result of close timing of activities to achieve efficiency
6. Staff Stay in ANEEJ Quarters
7. Inclusiveness of multivariate stakeholders in planning and implementation of programmes
8. Savings on travels as a result of COVID-19 Pandemic.

In overall, ANEEJ's inclusion in the institutional infrastructure governing asset recovery and management, for example in the Presidential committee which will determine how 3-4 trillion naira (£5.6 billion - £7.5 billion) of assets confiscated by Nigerian ACAs increase the likelihood that it will be able to continue to influence improvements in asset management.



5.2 Economy

Cumulative expenditure savings on the project: By utilizing VFM policies and approaches MANTRA has saved cumulatively a total of £760,979.99 when compared with the alternative cost of administering the project at £1,412,932.63. VFM Analysis on amount spent by category and activities are in pounds. The most economical area of savings was on the schedule of the monitoring exercise to be conducted bi-annually rather than after every disbursement which occurs up to 6 times a year. See analysis of savings by category in figure 5 below.

Staff Sharing: The estimated saving on staff sharing was £224,203.92 which meant the project had a 37% difference in savings expenditure utilizing staff cost sharing approach compared with engaging staff at a 100% LOE approach. **Cross-Programme Partnership:** The estimated saving on cross-programme partnership was £69,410.12. The partners engaged in cross-programme partnership include the Switzerland embassy, Bread for the World and the Mac Arthur foundation.

The most significant example of savings in project activity costs achieved on partnerships is from MANTRA covering the full cost of Journalists Capacity Building Workshop on Asset Recovery and Anti-Corruption Issues in Nigeria (£9,058.24) that previously would have relied on ACORN support. MANTRA is able to cover this cost as a result of partnership with the SWISS embassy who solely funded this requirement as part of support for the effective monitoring project. **Savings on travels as a result of COVID-19 Pandemic:** The estimated saving on travels as a result of COVID-19 was £8,829.8. This covers partners meeting, DFID meetings, Steering committee meetings and Audit meeting organized online. Overall, MANTRA project partners were efficient and effective in the utilization of resources provided with the results achieved in the project so far. There were no cases of fund diversion nor loss.



5.3 Efficiency

Use of Contextual Analysis: The most significant example of general cost saving achieved from the use of contextual analysis is the decision to conduct a bi-annual beneficiary monitoring (estimated cost £205,778.8) instead of monitoring every cycle of payment round which occurs up to 6 times in a year (estimated cost =£617,336.5). This provides an estimated saving cost of £411,557.7 annually. As at the end October 31, 2020, the total cost of MANTRA Monitoring is put at about £344,947 (N162,125, 105.29). This also saves the time and effort of the project team to enable them focus on advocacy to achieve progress on feedback from monitoring findings. Other savings on contextual analysis include savings on logistics (£1699.67) as a result of close scheduling of activities (back to back).

Use of Evidence & Learning: The project utilized a pilot in its monitoring arrangement to learn what works and what doesn't. This enabled the project select the most effective methods to understand the disbursement of looted assets challenges in systems and from the beneficiary perspective. It also enabled a more effective stakeholder engagement process in the monitoring activity ensuring the right stakeholders were engaged in the process.



5.4 Expenditure by States

State based expenditure in MANTRA was premised on identified needs and the estimated population as a sample of the total population to be reached in the selected States. Bayelsa, and Edo States were identified for work on policy implementation for improved asset recovery framework in the States and the Open Government Partnership initiative as per project design. While the remaining states were selected based on a random sampling methodology of States to be reached in the monitoring exercise.

The State with the highest expenditure was Edo State -£1,175,658.05, while the State with the least expenditure was Yobe State -£ 302.64

TABLE 9: OVERVIEW OF EXPENDITURE BY STATE ON THE MANTRA PROJECT

SN	Expenditure Description	Amount in Pounds (£)
1	Total Expenditure by States on the MANTRA	1,968,197.79
2	Minimum Expenditure by State	302.64
3	Maximum Expenditure by State	1,175,658.05



5.5 Effectiveness Responsiveness:

The project recorded a 'budget responsiveness' of government to citizens 'demands' with the inclusion of N258,680,000 naira in the N8.92 trillion National budgets as source of revenue for the 2020 Federal budget. This means asset recovery provided 2.9% of revenue for country revenue, ensuring transparency in the utilization of recovered assets through the National budget. The five rounds of field monitoring conducted through MANTRA project saves up to N,57 000,000 in every payment round from 2018 to 2020 that would have been lost as a result of deductions from the money of CCT beneficiaries.

Table 10: MANTRA project potentially saved N57,000,000 in every payment round.

<p>The total cost of MANTRA monitoring is about N162,125,105.29 from 2018 -2020.</p> <p>EFFECTIVENESS : MANTRA monitoring of the May June 2019 payment cycle revealed 2.5% of respondents (n= 906) had 2,713,470 deducted from their money. Average deduction = 2995.0 Naira</p>	
<p>May/June 2019 payment cycle Total beneficiaries paid 329,963 Projected estimated deductions 24,705,979.63naira</p>	<p>January/ February 2020 payment cycle Total beneficiaries paid 755,375 Projected estimated deductions 56,558,703.13 naira</p>

MANTRA monitoring of the systems and its reforms will potentially save up to 57,000,000 naira in every payment round. E.g The community leader refunded N1,000 Naira deducted from each beneficiaries in Dakku Town in Gombe state



5.6 Equity

The MANTRA project reached over 28, 372 females as at October 31, 2020, with a participation of 1,160 females’ attendance in the MANTRA programme. While 26,411 CCT women beneficiaries were reached during the monitoring exercise and additional 231 CCT females’ beneficiaries during the Town Hall meetings on grievance and Focus Group Discussion on the impact of COVID-19 organized across the 6 Geo-political Zones in 8 states. The MANTRA project also trained and engaged 492 female monitors and PWDs as data clerks during the monitoring exercise. And lastly, 78 female students in public schools in mostly rural areas in Bayelsa participated in the sensitization programme on anti-corruption organized by MANTRA partner in the state.



6. Lessons Learnt

The project identifies and documents lessons learnt on project activities and outcomes at its monthly and quarterly review meetings, its reporting process as well as at the close out of every review period. Lessons learnt session include project team members and validation meetings with project stakeholders engaged in the project. Successes achieved and challenges (including the key factors contributory to the success and challenges) as well as recommendations for future programming are documented. These are to be utilized for decision making and use in future programming.

The project lessons learnt are disseminated to partners, stakeholders and other similar programmes as briefs and fliers^{12,13,14} in review meetings, conferences and other dissemination events. Some key lessons learned in the programme is listed below

¹² MANTRA project lessons learnt brief 2019

¹³ About MANTRA 2018

¹⁴ MANTRA has been invited to present its success story and lessons learnt on the role of CSO in asset recovery management in Paris, Canada and the US.



- Working collaboratively with Government stakeholders and not as antagonists is key to the success of the programme. Past experiences where CSOs had been antagonists had diminished the opportunity for progress and uptake of recommendations due to poor relationship management. Continuous effective engagement with public institutions can lead to collaboration between CSOs and government and sustainability of programmes beyond the life of the project being implemented.
- Working with local CSOs at the grassroots and citizens is cost effective and promotes sustainability. ANEEJ involved downstream partners in most of its central activities. It led to the establishment of contacts with government institutions across the 6 geo-political zones of the country and at the same time positively influenced State level government interactions.
- The timing of the monitoring exercise as a biannual exercise rather than after every payment cycle allows cost effectiveness in the exercise. It also allows for the uptake of the recommendations of the previous monitoring exercise. This will enable the project clearly identify progress made or lack of it on earlier issues raised.
- Most constituencies in society would be willing and enthusiastic to play central roles in tackling corruption in the country if they understood their roles in this regard and got education on how to go about it.
- Facilitating alliance between Civil Society from requesting and requested countries provides a platform for sustained civic engagement on asset recovery
- MANTRA project impact acknowledged globally in Transparency International report published this year 2020 titled EXPORTING CORRUPTION; Progress report 2020: Assessing enforcement of the OECD Anti-Bribery Convention. <https://images.transparencycdn.org/images/A-short-version-of-Exporting-Corruption-2020.pdf>



7. MANTRA Model

Designed to identify corrupt practices and promote systems strengthening to aid the prevention of corruption in the use of the recovered funds. Reviews processes, systems, services and data generated thereby ensuring recovered funds benefit the citizens through a process that cannot be exploited for personal or political gain. In line with global recommendation, treaties and practice such as the United Nations Convention against Corruption (UNCAC), Global Forum on Asset Recovery (GFAR), and open contracting principles and practices

MANTRA MODEL



Figure 13: MANTRA Model

8. Challenges/Risk



The cash transfer programme was also at risk of being perceived by the general populace as vote buying in favour of the ruling party (APC) thus questioning the purpose and good will of the programme at the election period. MANTRA ensured continued evidence-backed information flow to the general public as to the origin and purpose of the programme for the benefit of citizens. This includes publications and posts on the benefit of the programmes which were referred to repeatedly by High level Government spokespersons as evidence on programs results.

The ruling party APC already had anti-corruption as a priority on its agenda it was important to ensure continuity of the agenda if re-elected or to ensure adoption by other parties if elected even at sub-national levels. The project engaged political parties on anti-corruption to ensure sustainability of anti-corruption initiatives with any party elected in Nigeria.

The COVID 19 pandemic resulted in challenges with activity implementation and resulted in delays following up on commitments for reforms by the Executive arm of government.

The EndSARS protest in the country was also a risk to project implementation but the MANTRA team coordinated by ANEEJ conducted more virtual meetings, press releases and embarked on use of mails to engaged the government and concentrated more on writing the final report and documentation process of the project.

9. Sustainability



Sustainability is ensured by the buy in of the project by the Government of Nigeria and other stakeholders on the demand side in support of project results. MANTRA project has good buy in and ownership from the present Executive and Legislative arms of Government in the present administration as well as from the public. Factors to support sustainability includes:

- The progress made in partnership with Government for the strengthening of Institutional framework for asset recovery and the establishment of management unit for asset recovery in the FMOJ and the presence of regulations and guidelines which ensures strong institutions capable of continuing the results achieved on the projects in an institutionalized manner.

MANTRA also works with grassroots CSOs and youth groups in Nigeria¹⁵. All these ensure that the project remains sustainable as civil society /citizens and Government driven initiative to reduce corruption in asset recovery after the life of the project.

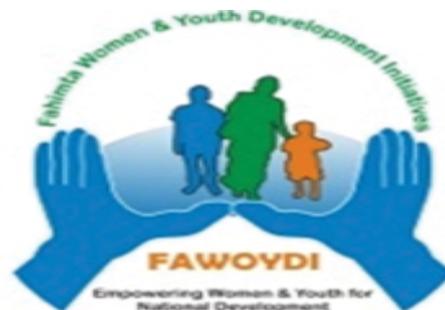
- Engaging with political parties on anti-corruption as a priority increased opportunity for sustainability of the anti-corruption initiatives of the project through party administrations elected Nationwide.
- The MANTRA team is also committed to ensuring the project continues and the staff and CSOs are committed to the initiative.
- ANEEJ Executive Director, Rev David Ugolor nomination as one of the 22 members of the Inter-Ministerial Committee on the Disposal of Federal Government Forfeited Assets and presidential approval for the committee will continue to use the platform to advance the issues of Asset recovery management.
- ANEEJ is in discussion with Save the Children for partnership on the CDGP Project supported by FCDO and also solicits more donors coming on board
- Some Project Staff and MANTRA partners to render agree to render pro bono services to keep some key project activities going during this phase.
- ANEEJ and MANTRA Partners agree continuation of project even with the end of FCDO support while exploring possible partnership with Save the Children to keep key activities going.

¹⁵ List of MANTRA CSOs

10. Recommendations/Next Steps

1. MANTRA results achieved on asset recovery management and utilization as well as citizens behavior change communication in the ACORN programme are new strides on the road to a corruption-free Nigeria. ANEEJ and its CSO Partners will continue to leverage on the learnings to ensure traction on the reforms achieved and a responsive society which ensures a future with no incentives to loot assets meant for the well being and development of Nigerians.
2. We strongly recommend that the FCDO should continue to support anti-corruption activities in Nigeria as corruption remains a major obstacle to poverty eradication efforts and good governance in the country.
3. It is advisable for CSOs to work collaboratively with government institutions and not as antagonists. MANTRA project has shown that continuous and effective engagement with public institutions can lead to collaboration between CSOs and government and sustainability of programmes making it a win-win for both stakeholders.
4. CSOs need to work in an open and transparent manner to build confidence among network members to achieve better results as evidenced in the MANTRA project consortium.
5. The old maxim of think locally and act globally came out strong in the MANTRA project as its model, impact and lessons learnt were disseminated globally. We recommend this for other future projects, particularly countries interested in asset recovery as a source of development finance.
6. The change of leadership in government institutions specifically NCTO affected the timely response to information towards the end of the MANTRA project which is capable of undermining the gains and results achieved in the project. We recommend that government officials should be free to work with CSOs and make available information that relates to public good to CSOs that seek such information in line with the FOI Act. It is a win-win for government and CSOs in the larger interest of the public that they both serve.
7. Media should continue to work with CSOs to create awareness and stimulate public discourse on corruption and other related issues with evidence generated by CSOs. To increase citizens participation in governance and promote accountability in government.
8. The MANTRA project contributed to organised citizens action towards resisting corruption in the Cash transfer programme which resulted to termination of appointments of some staff involved in such acts and refund of money to some affected beneficiaries as well as strengthening of the grievance redress mechanism. We therefore recommend that Nigerians should continue to speak out and resist any form of corruption in the society.
9. The early termination of the ACORN programme as a result of the COVID-19 pandemic and the consequent downturn in UK's economy affected the full implementation of the project. We recommend that FCDO and other Donor agencies should take proactive measures and put in place alternative mechanisms to forestall similar cases in future programming.

MANTRA PARTNERS





Foreign, Commonwealth & Development Office

