Role of Citizens in the Implementation of Conditional Cash Transfer Programme

Africa Network for Environment and Economic Justice (ANEEJ)
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Abbreviations

<table>
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<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>APC</td>
<td>All Progressives Congress</td>
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<tr>
<td>ARMA</td>
<td>Asset Recovery and Management Agency (Ukraine)</td>
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<td>AU</td>
<td>Africa Union</td>
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<td>ANEEJ</td>
<td>Africa Network for Environment and Economic Justice</td>
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<tr>
<td>BPP</td>
<td>Bureau of Public Procurement</td>
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<td>CBN</td>
<td>Central Bank of Nigeria</td>
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<td>CBT</td>
<td>Community Based Testing</td>
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<td>CCT</td>
<td>Conditional Cash Transfer</td>
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<td>CSOs</td>
<td>Civil Society Organizations</td>
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<td>DFID</td>
<td>Department for International Development</td>
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<td>FGN</td>
<td>Federal Government of Nigeria</td>
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<td>FOI</td>
<td>Freedom of Information</td>
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<td>GDP</td>
<td>Gross Domestic Product</td>
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<td>GEEP</td>
<td>Government Enterprise and Empowerment Programme</td>
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<td>GFAR</td>
<td>Global Forum on Asset Recovery</td>
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<td>ICPC</td>
<td>Independent Corrupt Practices and Related Offences Commission</td>
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<td>IDPs</td>
<td>Internally Displaced Persons</td>
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<td>ILO</td>
<td>International Labour Organization</td>
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<td>LGAs</td>
<td>Local Government Areas</td>
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<td>MANTRA</td>
<td>Monitoring of Recovered Assets in Nigeria through Transparency and Accountability</td>
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<td>MoU</td>
<td>Memorandum of Understanding</td>
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<td>NASSCO</td>
<td>National Social Safety Net Coordinating Office</td>
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<td>NCTO</td>
<td>National Cash Transfer Office</td>
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<td>NCTP</td>
<td>National Cash Transfer Programme</td>
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<td>NGO</td>
<td>Non Governmental Organisation</td>
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<td>NIBSS</td>
<td>Nigeria Inter-Bank Settlement System</td>
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<td>NLSS</td>
<td>National Living Standards Survey</td>
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<td>NSIO</td>
<td>National Social Investment Office</td>
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<td>NSIP</td>
<td>National Social Investment Programme</td>
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<td>OGP</td>
<td>Open Government Partnership</td>
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<td>PVHHs</td>
<td>Poor and Vulnerable Households</td>
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<td>PWDs</td>
<td>Persons with Disabilities</td>
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<td>SFO</td>
<td>Special Fraud Office (UK)</td>
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<td>StAR</td>
<td>Stolen Asset Recovery Initiative</td>
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<td>TOR</td>
<td>Terms of Reference</td>
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<td>UK</td>
<td>United Kingdom</td>
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<td>UN</td>
<td>United Nations</td>
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<td>UNODC</td>
<td>United Nations Office on Drugs and Crime</td>
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<td>VPHHs</td>
<td>Vulnerable and Poor Households</td>
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</tbody>
</table>
# Table of Content

Chapter One
Introduction ................................................................. 8
Definitions ................................................................. 10

Chapter Two
National Social Investment Programme in Nigeria------------------ 13
Operational components of Conditional Cash Transfer Programme—— 13
Civil Society and accountability mechanisms---------------------- 14
CSO supporting Accountability in Cash transfer programme--------- 15

Chapter Three
Modernization in Cash Transfer Programme............................. 17-19

Chapter Four
Emerging Lessons and Good practice................................... 20-21
General Lessons and Best practice from implementation of CCT---- 22-24

Chapter Five
How Conditional Cash Transfer Programme operates in Nigeria---- 24
Enlisting poor and vulnerable households-------------------------- 25-27
NCTP’s funding sources................................................... 27-29
NCTP coverage............................................................. 29-30
Mode of cash distribution................................................. 30
Training........................................................................... 31
NCTP’s transparency and accountability mechanisms............... 31-32
NCTP’s transparency and accountability mechanisms............... 32

Chapter Six
Role of Citizens in the CCT Programme in Nigeria---------------- 33
Expectation from Beneficiaries------------------------------------ 33
Beneficiaries.................................................................... 33
Role of Civil Society Organisations (CSOs)------------------------ 34

Chapter Seven
How Citizens Can engage National Cash Transfer Office (NCTO) in Nigeria—— 36-37

Chapter Eight
Key Implementation Challenges facing CCT------------------------- 38
Key Implementation Challenges Facing CCTPs-------------------- 38
Assessing Performance of Integrity Management------------------- 39-40
Impact of CCT Programmes................................................ 40

Appendix............................................................................ 41-43
About ANEEJ....................................................................... 44
References........................................................................ 45
List of Tables

Table 1: Federal government’s budget and NSIP’s allocation (2016-2018) .......................................................... 27
Table 2: Transparency International Approach Assessing Vulnerability of CCTPS To Integrity Risks ................................................. 39-40
Box 1: Examples Of Good Practices To Improve Targeting Of Beneficiaries In CCCTs .............................................................. 21
In no particular order of importance, the Africa Network for Environment and Economic Justice (ANEEJ), wishes to acknowledge the effort of all those who contributed in one way or the other to the success of this publication.

The effort put into this work by the Lead researcher and consultant, Solomon Imohiosen, Esq Editor-In-Chief of Bendel Newspapers Company Limited, Publishers of the Nigeria Observer titles is worthy of commendation.

The support from the British Department for International Development (DFID) made this publication possible as it funded ANEEJ 's Transparency and Accountability in the recovery and Management of recovered looted Assets (MANTRA) project and this report is one of the project's output. We are thus indebted to DFID's entire ACORN team led by Ms. Sonia Warner for support to ANEEJ.

Special appreciation also goes to ANEEJ staff for the effort and the time devoted to review this work.
Corruption remains a perennial challenge to development in Nigeria. Despite its massive crude oil deposits and other resources, the country continues to experience widespread poverty and underdevelopment. According to the UN and the AU, around $148 billion is stolen from Africa annually by political leaders, multinational corporations, the business elite and civil servants with complicity of banking and property industries in Europe, North America and elsewhere who facilitate the laundering of such funds through complex financial transactions and mechanisms. Estimates indicate that Nigeria lost about $40 billion as illicit financial flows between 2001 and 2010 alone. Transparency International (TI), recently ranked Nigeria 148th out of 180 countries ranked in its 2017 Corruption Perceptions Index (CPI). The country, according to the CPI, scored 28 out of 100, a figure lower than the average in the Sub-Saharan region.

The Federal Government of Nigeria, working with the international community, has demonstrated obvious commitment and determination to recover and manage returned looted assets through the measures provided by the provisions of UNCAC, the commitments made at the London Anticorruption Summit in 2016, the Global Forum on Asset Recovery in 2017 and other mechanisms.

Progress has been made in this regard. The Switzerland Government has, per an MoU signed by the Nigerian Government with Swiss Government and the World Bank, recently returned $322.5 million to Nigeria as part of the over $4 billion stolen by late dictator, General Sani Abacha, which the Federal Government has committed to use in financing social welfare programmes. The United Kingdom has also agreed to return the $73 million from the Malabu oil deal whilst the United States is also in the process of returning $900,000 stashed in that country by former Governor of Bayelsa State, Diepreye Alamieyeseigha.

The Federal Government is currently implementing the National Safety Investment Programme (NSIP), part of which is the Conditional Cash Transfer Programme which provides some amount of money to the poorest of the poor. The Federal Government is set to spend the returned $322.5 million repatriated from Switzerland in the CCT programme beginning from October 2018.

ANEEJ is implementing Transparency and Accountability in recovery and management of looted assets (MANTRA) Project being supported by DFID under its ACORN programme.

This Handbook on Role of Citizens in the implementation of Conditional Cash Transfer Programme is deliberate attempt by ANEEJ to improve Citizens engagement of the Conditional Cash Transfer Programme to enable Citizens and Civil Society Organisations to engage the process from informed perspectives.

Rev David Ugolor
Executive Director

Governments all over the world do carry out programmes to address the problems of the poorest of the poor in the society and they come in different forms. Conditional Cash Transfer programmes (CCTs) provide money to poor family’s contingent upon certain verifiable actions, generally minimum investments in children’s human capital such as regular school attendance or basic preventative health care. They therefore hold promise for addressing the transmission of poverty from one generation to the other and promotion of social inclusion by clearly targeting the poor, focusing on children, delivering transfers to women, and changing social accountability relationships between beneficiaries, service providers and governments.

CCT programmes are at the forefront of applying new social policy and programme administration practices all around the world of today. They actually focus on investments in health, education and nutrition, and combine short-term transfers for income support with incentives for long-run investments in human capital. Their impact depends on the supply of quality, accessible health and education services and may increase with strengthened links to the labour market, and a greater focus on early childhood and temporary support to households facing shocks.

However, CCT programmes, like most social programmes are facing a number of challenges as they evolve, from reaching vulnerable groups to fostering transparency, accountability, and participation, especially at the community level. Centralized programmes have been criticized for limiting the engagement of local governments and civil society. They are open to fraud, errors, corruption and misuse of funds, which undermine their achievements.\(^3\)

Risks associated with CCT result from lack of transparency in key systems (e.g. targeting, compliance verification), weakness in internal control and accountability systems, beneficiary falsification or concealment of information required for eligibility, bribes demanded from compliance verification officers to overlook non-compliance or validate compliance, unavailable or ineffective grievance redress processes, and interference with program design and implementation to derive political advantage (e.g. inappropriate inclusion or exclusion of eligible households).\(^4\)

Latin American countries developed two types of citizen oversight mechanisms for cash transfer programmes: individual and collective mechanisms, as a way of protecting the cash transfer programmes from corruption and vote-catching behavior. Collective mechanisms bring together civil society, in particular beneficiaries, with public sector representatives to ‘monitor that there are no mistakes in terms of inclusion and exclusion of beneficiaries, guarantee that the programme functions according to its initial objectives, and monitor that the cash transfers are

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\(^3\)Perron, 2012; J. Bhargava & Raha, 2015

\(^4\)Bhargava and Raha, 2015
not captured by elites or political interests, nor affected by corruption or vote catching behaviour. However, many cash transfer programme accountability mechanisms seem to favour individual approaches rather than collective action, which can result in individual beneficiaries being less able to stop abuses of power.

CSOs have supported accountability in cash transfer programmes from around the world by:
· working to improve transparency to help citizens hold authorities accountable;
· vetting beneficiary lists for errors; by encouraging compliance by highlighting benefits;
· gathering feedback to improve services; by assessing programme vulnerability to integrity risks and advocating to improve matters; and
· gathering grassroots level information on the programmes. This has happened in countries such as Mexico; Brazil; Philippines; Mozambique; Occupied Palestine Territories; Peru; Kenya; Turkey; and Paraguay.

In Nigeria, the All Progressives Congress, APC-led Federal Government introduced the National Social Investment Programme. It has four components namely: N-Power, National Home-Grown School Feeding Programme (NHGSFP), Government Enterprise and Empowerment Programme (GEEP), the Conditional Cash Transfers, and the Social Housing Scheme. The FGN, through the N-Power, anticipates that young Nigerians would be empowered with the necessary tools to go and create, develop, build, fix, and work on exceptional ideas, projects and enterprises that would change the communities, the economy and the nation. NHGSFP addresses the effects of malnutrition disorders on children's attendance and performance at school. It hinges on the fact that child poverty is central to Nigeria's 'bottom millions', illustrated by poor nutrition and poor health status.

With GEEP, the FGN seeks to enable micro-credit scheme for beneficiaries. It is sign-posted by 'MarketMoni', a vehicle for promoting financial inclusion and access to 1.6 million market traders, artisans, cooperatives, youth and farmers. The FGN, through the NCTP, intends to reach one million vulnerable Nigerians with a monthly stipend of N5,000. FGN's response to the country's housing deficit of between 16 -17 million, is the complemenetal social housing model to provide affordable shelter for all Nigerians, especially low-income earners.

The Conditional Cash Transfer Programme in Nigeria is receiving a boost from the Government as it plans to spend $322.5million Abacha loot returned by Switzerland on the programme beginning October 2018. Civil
Society Organisations led by the Africa Network for Environment and Economic Justice, ANEEJ will be monitoring the use of the loot in the CCT programme under its Transparency and Accountability in the recovery and management of looted Assets (MANTRA) project being supported by the British Department for International Development (DFID) under its broader Anti-Corruption in Nigeria (ACORN) project. Nigerian Citizens have several roles to play to ensure that the Conditional Cash Transfer Programme succeeds for the poorest of the poor who are the targeted beneficiaries of the scheme. It is also important to note that the key reason for Citizens to play a monitoring role in the use of the returned $322.5million Abacha loot is to ensure that the returned loot is not re-looted as it was the case in previously returned loot.

"DFID is supporting ACORN Project with £20million for five years 2017-2022. It is targeted at supporting both the sanctions and social norms effort in the fight against corruption."
Definitions

**Conditional Cash Transfer Programs (CCTPs)** are government programs that “provide cash to participants upon their fulfillment of a set of conditions or co-responsibilities.” Examples include one or more conditions such as: ensuring a minimum level of school attendance by children, undertaking regular visits to health facilities, or attending skills training programmes. Some CCTPs also include school stipend programs, graduation programs, and food distribution.

**Citizen engagement** is defined by the World Bank as two-way interaction between citizens and governments or the private sector within the scope of World Bank Group interventions – policy dialogue, programs, projects, and advisory services and analytics – which give citizens a stake in decision-making with the objective to improve intermediate and final development outcomes. The spectrum of citizen engagement includes consultation, collaboration/participation, and empowerment.¹

**Social accountability initiatives** are defined as programmes that feature citizen' and civil society organization (CSO) engagement “with policymakers and service providers to bring about greater accountability for and responsiveness to citizens’ needs” (GPSA). In this Handbook, we use the following classifications of social accountability

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¹ World Bank (2014).
mechanisms/processes (See overview of social accountability tools is attached as Annex).

**Beneficiaries:** are defined as those clearly identifiable households or individuals that receive CCT benefits during programme implementation.

**Integrity:** is defined as the CCTP's "capacity to prevent any deviations from its intended use and any change in the designated beneficiaries resulting from inclusion and exclusion errors, clientelism, or abuse of power for personal gain".

**Community-based targeting:** Involvement of community members and leaders to decide local eligibility for the poorest and vulnerable households in their community. The purpose it engenders community ownership in eligibility for cash transfers.

**Development cooperation:** International action explicitly intended to support national or international development priorities in favour of developing countries, based on cooperative relationships for the advancement of developing country ownership.

**Evaluation:** Systematic and impartial assessment of an activity, project, programme, strategy, and policy, to determine expected and achieved accomplishments.

**Geographical targeting:** Application of poverty map of existing classifications of poverty across all states of the federation.

**Monitoring:** Continuous examination of progress achieved in the course of project implementation for the purpose of taking necessary decisions to improve performance.

**Poverty mapping:** Application of data to identify the poorest local government areas in a state.

**Proxy means test:** Use of observable household individual characteristics such as location and quality of the household's dwelling, education and occupation of its adult members, etc. The purpose is to eliminate the more affluent in cash transfers.

**Top Up:** Additional money given to a beneficiary on fulfilment of certain conditions.

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Chapter Two
National Social Investment Programme in Nigeria

When the current government came into office in 2015, they promised Nigerians 4 cardinal agenda of Improving the economy, fighting poverty, war on corruption, and tackling insecurity as it relates insurgency. During the 2015 elections, the APC and its presidential candidate, Muhammadu Buhari made some promises to improve the wellbeing of Nigerians, using different mechanisms, such as the Social Investment Programme. The NSIP is intended to empower Nigerians. Its overall goal is to promote human capital development.

The NCTP factors into the ILO's social insurance and the World Bank strategic goal of 'equity'. The social housing programme factors into the ILO's 'social insurance' and the World Bank's strategic goal of 'equity'. Curiously, the NSIP is in furtherance of Global Goals, which include: 'No Poverty' (Goal 1), 'Zero Hunger' (Goal 2), 'Good Health and Wellbeing' (Goal 3), 'Quality Education (Goal 4), 'Gender Equality' (Goal 5), 'Decent Work and Economic Development' (Goal 8), 'Industry, Innovation and Infrastructure' (Goal 9), and 'Reduced Inequalities' (Goal 10, (ANEEJ 2018).

Operational components of Conditional Cash Transfer Programme

Conditional Cash Transfer Programme is usually for very poor households. It is conditional on complying with household members participating in specified productivity and welfare enhancing programmes. Usually the conditions relate to health, nutrition, and education programmes. Participation is intended to produce both short-term benefits (e.g. increased household consumption) and long-term benefits (e.g. disrupting the intergenerational cycle of poverty through human capital formation). Typically, CCTPs have the following operational components:

a) Determination of eligible beneficiaries based on targeting criteria and creation of a registration system to keep records (management information systems) on a large number of beneficiaries. This is important to ensure that the scarce public resources flow only to clearly identifiable and targeted beneficiaries with minimal inclusion and exclusion errors.

b) Establishment of co-responsibilities whereby beneficiary families need to fulfill certain conditions (usually related to children and maternal health and schooling) to avail grant of benefits and government agencies need to ensure access and quality of services related to the compliance conditions. This is important because without effective fulfillment of these co-responsibilities the impact is undermined.

c) Creation of a benefit payment plan involving delivery of cash or bank transfers as well as determining the frequency and amount of payments. Timeliness in payment is important to ensure that benefits and

CCTPs are paying attention to help CCT recipients move toward self-sufficiency by connecting them with programs such as opportunities for vocational training, financial support for productive activities, and higher education.

For a successful Conditional Cash Transfer Programme, citizens must understand some tools used for assessment. These are programmes that bring citizens and Civil Society Organisations working together to engage government to achieve some set goals. Engagement of government Ministries, Departments and Agencies are key to the success of CCT.

A review of citizen engagement and social accountability mechanisms in cash transfer programmes found a number of ways in which civil society organisations support accountability in cash transfer programmes:

- Assess awareness, access, and quality of information and provide feedback to authorities to further improve transparency, setting the basis for engaging citizens to hold the implementing authorities accountable.
- Support communities to vet lists of beneficiaries to minimise obvious errors of inclusion, exclusion and exit.
- Help to improve compliance with conditions by working with beneficiaries to help them understand benefits.
- Help with beneficiary feedback collection and use it to constructively engage with service providers to improve access, quality,

Incentives to the recipients are intact.

d) Grievance redress system is one of the most important components of the CCT. It is needed so that individuals can resolve their complaints/grievances, failures in the program management can be revealed and resolved and targeting errors can be discovered and rectified.

e) This includes management information systems that provide accurate and timely information on targeting performance, beneficiary feed-back, and other key performance indicators for the program. It also includes provisions for internal and external audits and independent impact evaluation measured from a baseline.

f) Internal control and accountability systems are almost never able to ensure full integrity of CCTPs (or of any social services program, e.g. social security, food stamps, etc.). Recognising this, many CCTPs provide for citizens' and civil society groups' engagement to improve the integrity of the program in a complementary role.

g) Graduation (exit). Increasingly CCTPs are paying attention to help CCT recipients move toward self-sufficiency by connecting (graduating) them with programs such as opportunities for vocational training, financial support for productive activities, and higher education.

Civil Society and accountability mechanisms

For a successful Conditional Cash Transfer Programme, citizens must understand some tools used for assessment. These are programmes that bring citizens and Civil Society Organisations working together to engage government to achieve some set goals. Engagement of government Ministries, Departments and Agencies are key to the success of CCT.

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- Support communities to vet lists of beneficiaries to minimise obvious errors of inclusion, exclusion and exit.
- Help to improve compliance with conditions by working with beneficiaries to help them understand benefits.
- Help with beneficiary feedback collection and use it to constructively engage with service providers to improve access, quality,
and responsiveness of the supply-side services (e.g. education, health) thereby enhancing impact.

- Independently assess vulnerability of conditional cash transfer programmes to integrity risks, performance of state-run integrity risk management systems, and follow up with evidence-based constructive dialogue and advocacy to improve matters in vulnerable areas.
- Gather information at the grassroots level on conditional cash transfer programmes outcomes (e.g. changed motivations, attitudes, and aspirations).
- Examples of social accountability tools used by civil society can be found in the Appendix at the end of this Handbook.

**CSOs supporting Accountability in Cash Transfer Programmes**

**Emerging lessons and good practice** in relation to CSOs supporting or providing accountability mechanisms in cash transfer programmes include:

- CSOs' support for, or provision of, accountability mechanisms for cash transfer programmes should complement, not substitute, government accountability mechanisms. A **combination of top-down and bottom-up approaches is most effective** in mitigating risks.

- CSOs can **assess availability of information and advocate for greater transparency**. Accessible Management Information Systems provide civil society organisations with the means to hold programmes accountable.

- CSOs can provide **independent third-party monitoring** of cash transfer programmes and government oversight mechanisms.

- CSOs can be important **facilitators** in the implementation of cash transfer programmes by better linking authorities and beneficiaries. They can encourage targeted populations to **participate at all stages of the programme design and implementation** in order to prevent fraud and corruption.

- **Participation of CSOs in grievance reporting** can improve its responsiveness through raising awareness and facilitating grievance filing and follow-up.

- **Well-managed collaboration and coordination** with all actors, including CSOs and beneficiaries, in cash transfer programmes decision-

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18 Integrity is the ‘capacity to prevent any deviations from its intended use and any change in the designated beneficiaries resulting from exclusion errors, clientelism, or abuse of power for personal gain’ (Bhargava & Raha, 2015: vi).
making processes is good practice.

CSOs support for, or provision of, accountability mechanisms for cash transfer programmes should be operationally and financially independent of the agencies implementing the cash transfer programmes for greater effectiveness.

Developing good relationships with those responsible for the cash transfer programmes can help CSOs to encourage them to improve the quality of the programme.

Rights education by CSOs can empower beneficiaries to hold programme implementers to account.

CSOs can use a methodology developed by Transparency International consisting of a risk assessment of the process of the cash transfer programme, a risk map of stakeholders, reporting, and monitoring and advocacy, to detect risks to integrity, possible exclusion errors, and a programme effective capacity.

Efforts should be made to strengthen and support local level CSOs’ oversight and control of accountability mechanisms.

CSOs can provide technical advice to political parties on how to avoid and prevent political abuse of the programmes.

CSOs are not necessarily representative of beneficiaries, who may lack time and other resources to get involved. Their effectiveness can be challenged by coordination challenges, funding constraints, limited scale, the political economy, and donor priorities.

Lack of willingness by public officials to provide information, set up citizen oversight mechanisms, and correct and sanction corruption and mismanagement can pose problems for setting up civil society accountability mechanisms. CSOs cooperating with audit institutions to perform social audits could help overcome this.
Chapter Three

Modernization in Conditional Cash Transfer Programmes

According to Bénédicte de la Brière and Laura B. (2006), CCTs have introduced a number of modernizations in program administration that have helped establish these programs as among the more effective and efficient in the array of social assistance transfers. These are important to furthering goals of social inclusion as they allow for improvements in management. Taking advantage of technological advances, they seek to reduce clientelism and corruption through modern systems for beneficiary selection, registration, payment and monitoring of program conditionalities. Some programs have also used systematic evaluations strategically to provide empirical evidence about program performance that has been crucial to generating support for the programs across party lines and political administrations.

In many countries like Mexico, Brazil, Turkey and Argentina, the introduction of a CCT program is part of a broader reform of social assistance linked to the reduction or elimination of less well-targeted and effective programs in order to keep social assistance expenditures budget neutral and more results-focused. Program proponents emphasize these features as important elements of a reformed approach to social assistance, based on administrative efficiency, transparency, fiscal responsibility and results. Several of these features are discussed below.

A. Unified registries of beneficiaries

To decrease overlap and duplication of benefits, large-scale programs are using unified electronic registries of beneficiaries, which generally assign program recipients a unique social identification number that allows beneficiaries to be tracked over time and across programs (Castaneda and Lindert, 2005). The administration of these registries varies, with completely centralized operations in Mexico and decentralized administration in Brazil, Turkey and Argentina that is consolidated into a centralized national database. These databases are sometimes cross-checked with other databases from formal employment, deaths registry and pensions to bring them up to date and ensure compliance with program regulations. As program operations stabilize, the quality of the registries tends to improve, but concerns have been raised about their overall reliability and the risks associated with privacy, the potential for manipulation, and the high-stake nature of errors of inclusion and exclusion.

B. Strategic use of evaluations

Unlike most traditional social assistance and development interventions, CCT programs tend to include evaluations, notably impact evaluations conducted by external evaluators, as an integral part of their design.
evaluations serve a technical purpose by providing an empirical basis for program expansion and modification, as well as a political purpose by providing policy-makers with credible evidence to scale-up effective programs and protect them during political transitions. In Mexico (Skoufas, 2005), Nicaragua (Maluccio and Flores, 2005), and Honduras (Glewwe and Olinto, 2004), the programs used gradual geographic expansion to randomly incorporate beneficiaries, taking advantage of logistical complexities, fiscal constraints and uncertainties about programs' impacts to introduce methodologically solid evaluations based on experimental designs. More recently, programs are increasingly using quasi-experimental designs with matching methods such as in Jamaica, Colombia and Brazil. Most countries combine quantitative and qualitative analysis to gain a better sense of beneficiaries' perceptions and of community dynamics and processes.

C. Strengthened monitoring systems

Another area where CCTs have introduced innovations is in the monitoring of program conditionalities. Effective monitoring is intrinsically linked to program credibility, as illustrated by the drop in school attendance, which followed the collapse of the monitoring during the programs' unification in Brazil and the subsequent increase as the new monitoring system became functional. As much as monitoring contributes to program effectiveness, most countries still face numerous institutional challenges in setting-up their systems and following up on the results. Mexico, Colombia and Nicaragua centrally manage extensive records of all beneficiaries while others such as Brazil use a system where only households who are not fulfilling are reported. Colombia complements its basic monitoring approaches with random audits of school and health centers to check records and attendance and Argentina uses its quarterly household survey to monitor compliance with the work requirement on a macro-level.

These integrated monitoring and evaluation systems provide policymakers with a useful set of tools for program design and implementation, based on data collected from the field and reported up to program administrators. The element that has received less focus are devolution to and community-based monitoring and evaluation. These approaches -- which range from community score cards to the publication of public expenditures— foster beneficiary engagement and transparency by using information that is either generated and managed locally or transmitted from program administrators down to beneficiaries.

D. Improved payment systems

In some countries, CCTs have been at the forefront of adopting new
payment technologies to reach out to populations, many of whom had not participated previously in the financial sector. These advances are also important elements of improved program administration. For example, through the use of debit cards, several countries (Argentina, Brazil, Mexico) have improved their payment performance and their agility in disbursing the benefits to intended beneficiaries. Electronic transactions are easier and faster to verify and enable a better timing of program outlays. Also, financial data can be consolidated and placed on the internet (Brazil discloses transfers to municipalities), giving beneficiaries and local program managers tools for greater accountability.

Many of these administrative modernizations first introduced in CCT programs have been expanded and applied to other programs. In Mexico and Colombia, evaluations are now mandated for many social assistance programs and in a number of countries, unified beneficiary registries are allowing for the coordination of benefits from an increasing array of programs.

In middle-income countries, these modernizations in operations have required substantial upfront investments particularly given their links to advances in technology. These costs are amortized over the life of the program, as demonstrated by Mexico PROGRESA/Oportunidades program which administrative costs went from 51.5 percent of total budget in 1997 to 6.0 percent in 2003 (Lindert, Skoufas and Shapiro, 2005). More than the technological innovations, these changes may also be helping to foster a results-based management culture and a focus on the efficiency of public spending, a marked departure from the limited attention paid to these issues in the past, especially in Latin America. However, these innovations, because of their heavy information technology and institutional capacity requirements may well represent one of the greatest challenges for the implementation of these programs in low-income settings. In these settings, a stronger reliance on community monitoring (as in the Kenyan pilot) may prove to be more feasible than the rapid introduction of technological innovations to foster increased inclusion and accountability.
Chapter Four
Emerging Lessons and Good practice

Based on a review of the work and research done by others, the following good practices and lessons for greater engagement of citizens, CSOs and the use of social accountability initiatives in CCTPs were identified.

- **CSOs and civil society volunteers can be important facilitators in implementation of the CCTP by better linking authorities and beneficiaries.** Community facilitators (formal and informal) play an important intermediary role at the local level as well as in linking the grassroots to the national level (see cases from the Middle East and Africa, as well as Indonesia, and Peru in this report). However, their effectiveness can vary depending on the facilitators' caseload, skills, and knowledge. The effectiveness of such intermediation can be undermined when authorities within the CCTPs have weak relations with CSOs, since both sides may be wary of collaborating with each other due to the time and skills required. This is especially true at the local level. To counter such a possibility, the authorities need to take measures for CSOs to genuinely participate in program design, implementation, monitoring and evaluation.

- **Collaboration with citizen beneficiaries and civil society in CCTP decision-making processes is good practice but has risks that need to be managed.** Several countries have set up collaborative decision-making bodies involving civil society, community, and beneficiary representatives (e.g., Brazil, Peru, Philippines). They represent a good practice in helping beneficiaries access relevant program information, comply with their responsibilities, monitor program performance, provide feedback, and seek remedial actions against unjust practices. However, experience suggests that they can be effective only when the oversight of local government is limited, political interference is limited, and performance-monitoring indicators are used.

- **Quality and accessibility of information disclosed on CCTPs is a key determinant of social accountability initiatives and CSOs should assess the availability of information and advocate for greater transparency.** The range of “good practices” in information disclosure (Brazil, Peru) includes: institutional structure; regulations; board composition; reports; budget information; database of local government units (LGUs) selected and beneficiaries by LGUs; and principles and mechanisms for the targeting and selection of beneficiaries, allocation of resources, internal rules and norms, and complaint mechanisms.

- **Civil society participation improves the responsiveness of grievance reporting and other beneficiary feedback mechanisms** by raising awareness and facilitating grievance filing and follow-up (Philippines, Mexico).
Grievance redress mechanisms are key components of all CCTPs. However, their performance varies over time and location. CSOs can play an important role in checking performance and advocating for improvements. Mexico’s use of biannual surveys to collect stakeholders’ opinions and knowledge about the CCTPs constitutes a good practice example. In 2014, the Mexican CCTP organized an “Exercise of Citizen Participation” with the intention to drive improvements in governance and in fighting corruption. Representatives of local-level collaborative committees, civil society, and academics attended it and tabled various proposals for improving the program.

- **Independent third-party monitoring by CSOs on the effectiveness of state-led integrity assurance systems is essential to enhance the integrity of CCTPs.** The major mechanisms for the ensuring integrity of a cash transfer program are those established by government to oversee, monitor, and audit. Since these typically are not sufficient and/or function poorly, they need to be complemented by CSO monitoring, both of the delivery of the CCTPs and the performance of governments’ own oversight mechanisms for CCTPs (World Bank, Peru).

- **Social accountability initiatives can be an effective complement to state-led control, but such accountability mechanisms engaging citizens/CSOs should not substitute existing internal management information systems of the CCTP already in use.** Several studies (World Bank, TI International, U-4) found that using a combination of top-down (e.g. supreme audit institutions, evaluation, spot checks) and bottom-up (e.g. beneficiary and civil society participation in key processes) approaches is most effective in mitigating risks. They caution that social accountability tools should be used as complements to internal and external audits and not as substitutes.

- **Social accountability initiatives should be operationally and financially independent of CCTP implementing agencies for greater effectiveness.** As noted above, collaboration by citizens and CSOs in decision making and delivery of CCTP services can add value by enhancing responsiveness and integrity of CCTPs. However, once CSOs are part of implementation (and sometimes paid by a government CCTP implementing agency) they are not in a position to hold the implementing agency accountable. The GPSA provides a good practice model whereby constructive engagement between government implementing authorities is required but the funding for GPSA grantees does not flow through the implementing agencies. This arrangement assures independence and objectivity.
In Brazil, the Bolsa Familia program uses several mechanisms to reward and improve municipalities’ performance in managing the roster of beneficiaries. Municipalities receive performance-based financial incentives in the form of administrative cost subsidies to partially reimburse the cost of implementing a biannual recertification of eligibility of beneficiaries.

In Bolivia and the Dominican Republic, the CCTPs coordinate with other institutions to reduce the number of poor people without documentation. This, in turn, allows beneficiaries to become eligible, reducing the risk of exclusion errors.

In Jamaica, the government has instituted several mechanisms to reduce targeting errors (inclusion and exclusion), including the use of an objective and transparent Beneficiary Identification System (BIS) now being improved to produce a new scoring formula based on the latest household survey, home visits, recertification, database crosschecks, and the establishment of appeals committees to reassess the situation of households at the margin of eligibility.

Social accountability initiatives can be an effective complement to state mechanisms, but such accountability mechanisms engaging citizens/civil society organisations should not substitute existing internal management information systems of the cash transfer programmes already in use.

General Lessons and Best practice from implementation of CCT

From around the world, there are several lessons and best practices from implementation of Conditional Cash Transfer. A review of control and accountability mechanisms in cash transfer programmes found a number of emerging good practices and lessons for greater engagement of citizens, civil society organisations, and the use of social accountability initiatives. Some of them are:

a) Complementary to state mechanisms, not a substitute: Social accountability initiatives can be an effective complement to state mechanisms, but such accountability mechanisms engaging citizens/civil society organisations should not substitute existing internal management information systems of the cash transfer programmes already in use. A combination of top-down (e.g. supreme audit institutions, evaluation, spot checks) and bottom-up (e.g. beneficiary and civil society participation in key processes) approaches is most effective in mitigating risks. A review of World Bank supported conditional cash transfer programmes in Latin America and the Caribbean also notes that social accountability mechanisms should be complementary to formal audits and internal monitoring, rather than a substitute for it (World Bank, 2007: 14).

b) Assessing availability of information and advocating for greater transparency: Quality and accessibility of information disclosed on conditional cash transfer programmes is important for social accountability initiatives. Civil society organisations should assess the availability of information and advocate for greater transparency. A seven country Latin American study also finds that
Civil society organisations and civil society volunteers can be important facilitators in implementation of the conditional cash transfer programmes through better linking authorities and beneficiaries.

c) Independent third-party monitoring by civil society organisations on the effectiveness of state-led integrity assurance systems is essential to enhance the integrity of conditional cash transfer programmes. Government tends to establish the major mechanisms to oversee, monitor, and audit cash transfer programmes. Typically, these are not sufficient and/or function poorly, and need to be complemented by civil society organisations' monitoring, both of the delivery of the conditional cash transfer programmes and the performance of governments' own oversight mechanisms for conditional cash transfer programmes.

d) Civil society organisations as facilitators: Civil society organisations and civil society volunteers can be important facilitators in implementation of the conditional cash transfer programmes through better linking authorities and beneficiaries. The effectiveness of civil society organisations can vary depending on the facilitators' caseload, skills, and knowledge. Effectiveness can be undermined when authorities within the programmes have weak relations with civil society organisations, since both sides may be wary of collaborating with each other due to the time and skills required. Authorities need to take measures to ensure civil society organisations can genuinely participate in programme design, implementation, monitoring and evaluation. A rapid literature review looking at corruption prevention strategies in cash transfer schemes suggests for example, that civil society can play an important role in encouraging the participation of targeted populations at all stages of the programme design and implementation in order to prevent fraud and corruption. The author uses the example of the Peruvian cash transfer programme, which has established a board with a balanced representation of involved ministries and local civil society organisations.

e) Participating in grievance reporting: Civil society participation improves the responsiveness of grievance reporting and other beneficiary feedback mechanisms by raising awareness and facilitating grievance filing and follow-up.

f) Collaboration and coordination in programme decision making processes: Collaboration with beneficiaries and civil society organisations in conditional cash transfer programmes decision-making processes is
good practice but has risks that need to be managed. Such collaboration can help beneficiaries access relevant programme information, comply with their responsibilities, monitor programme performance, provide feedback, and seek remedial actions against unjust practices. Experience suggests that collaborative decision-making bodies can only be effective when the oversight of local government is limited, political interference is limited, and performance-monitoring indicators are used. A study looking at beneficiary and community perceptions of five unconditional cash transfer programmes in Gaza and the West Bank, Yemen, Kenya, Mozambique and Uganda, found that there is a need for strengthened coordination across government agencies, NGOs and religious organisation service providers, facilitated by the national registry system, a mapping of complementary services and programmes, and strengthened management information systems, for improved programme governance and accountability.

**Independence of implementing agencies:** Social accountability initiatives should be operationally and financially independent of cash transfer programmes implementing agencies for greater effectiveness. If civil society organisations are part of implementation (or, for example, paid by a government cash transfer programmes implementing agency) they are not in a position to hold the implementing agency accountable. Funding from external sources such as the GPSA gives civil society organisations operational and financial independence. Nigeria could adopt this good practice by considering collaborating between state oversight agencies and civil society organisations to carry out social accountability work that complements the work of oversight agencies. A good practice example is the growing practice of participatory audits sponsored by Supreme Audit Institutions.

In Nigeria, under its ACORN programme, the British Department for International Development, DFID supported the Africa Network for Environment and Economic Justice, ANEEJ to carry out independent monitoring of the returned $322.5 million. This was after the Federal Government of Nigeria and the Switzerland Government signed a Memorandum of Understanding (MoU) to repatriate the loot and use it on Conditional Cash Transfer Programme.
Chapter Five

How Conditional Cash Transfer Programme operates in Nigeria

From interaction with the staff of the programme by ANEEJ team, it was discovered that the entire programme has several structures and involved several stakeholders. These are listed below:

- **Office of the Vice President.** This is where the social investment programme office is domiciled and headed by Maryam Uwais, Special Advisor to the President on Social Investments
- **The State cash transfer offices** (this is mostly operated in collaboration with State government)
- **National Social Safety Coordinating Office** – Responsible for mapping and enrolment of beneficiaries
- **State Operations Coordinating Unit** - Responsible for mapping and enrolment of beneficiaries
- **Money Agents** – *Remitta* is one of them – Responsible for the payments
- **Federal Ministry of Budget and National Planning** – ensures that the funds in budgeted for
- **The World Bank** – providing technical support

The National Cash Transfer Programme or conditional cash transfers is fondly called ‘Better don Come’. It was conceived as part of the FGN’s NSIP larger policy on growth inclusivity and social inclusion for addressing poverty in the country. The goal is to cushion beneficiaries' feeding and build their capacity for sustainable livelihoods. NCTP is in response to

21 Ujumadu, “FG pays N5000 to 400000 poor Nigerians under cash transfer programme in 20 states”
The NCTP commenced in 2016 with eight pilot states. The eight pilot states were selected using community-based targeting (CBT), a model developed by the World Bank, in partnership with the pilot states. The rationale for adopting the CBT was to avoid randomness in targeting. However, the inclusion of the internally displaced persons (IDPs) in Borno was based on data supplied by the State Emergency Management Agency. The FGN had preferred the commencement of the cash transfer programme in Borno State, but the communities could not be accessed due to the Boko Haram insurgency. The NCTP entails the transfer of N5,000 monthly (paid bi-monthly as N10,000) to the poor and vulnerable persons in Nigeria. Households with pregnant women, infants and children of school age get a ‘Top-Up’ of N5,000 (totaling N20,000 for such beneficiary). Environmental sanitation is also a consideration for beneficiaries of the conditional cash transfers. NCTP is for six years, with two sets of beneficiaries. The first set of beneficiaries will be graduated after three years, and news ones will be enrolled from the same benefitting communities.

Enlisting poor and vulnerable households

NCTP’s big centrepiece is the National Social Register. All those who have to benefit from the Conditional Cash Transfer Programme has to be captured in the National Social Register developed by the Federal Government with support of the World Bank and the various State Governments and communities across the six geo-political zones of the country. Enlisting the poor and vulnerable households (PVHHs) entails a combination of three data capturing processes, namely: geographical targeting, community-based testing, and proxy mean testing. The first step is geographical system, which ranks local government areas (LGAs) and communities by their poverty ranking. The poverty ranking is drawn from data of the National Living Standards Survey (NLSS) conducted by the National Bureau of Statistics (NBS). The NLSS ranks the entire country, the state and place them on their poverty status. Each LGA is also ranked within the state. The lists are ranked from the least poor to the highest poor. NASSCO takes 30 percent first stage in each state; the first 30 percent of the poorest LGA in each senatorial districts. For example, in states with only 23 LGAs, NASSCO chooses (and works with) six LGAs. In states with 30 to 40 LGAs, NASSCO chooses (and works with) nine LGAs.
This is a pointer to equitable distribution within the senatorial districts based on the poverty ranking.

Thus, the National Social Register was developed based on 30 percent coverage of the local government areas in the states. 30 percent benchmark was adopted because of funding constraints of registered persons in each state. After determining the poverty margin in each state, 30 percent of the poorest are selected from each senatorial district for the social register. It is envisaged by NASSCO that 50 percent would be done in the second year, while the remaining 20 percent would be done in the final year. The state governor agrees on the selected local government areas because there is no way the work would be done without the authority of state governor. However, selection of the poor is the sole responsibility of the community members. The payment register is drawn from the National Social Register, but every person in the social register does not get paid. The National Social Register enables every state to have access to its own register, but NASSCO has access to the entire register. The social register is hosted in the state ministry of planning.

In validating the register, a multi stakeholder engagement is applied to ensure the capture of essential database that will speak to the poverty of every community. Each community is divided into different groups, namely: women, men, and youth. In some cases, the groups are combined by the community to draw up names of people that are perceived as 'poor'. No household is imposed on the community by NASSCO. Through focus group discussion (FGD) in the local government area, the community would identify what poverty means to them and also which households fall within the poverty parameters. The FGD is followed by a plenary, and the community members have to agree. Issues or queries raised by the community people include the eligibility of the poor, and non-inclusion. Some would say, ‘this person is not poor, he is actually a miser, and his grand children live abroad’. Others would say they have been excluded and stigmatized, but they actually fall within the parameters. This procedure is complemented with the ranking of the poor (through proxy means testing) to eliminate the few elite and influential people whose names were captured in error. In this case, the possessor of a motorcycle, cattle, or a torch light is ranked as not being below the poverty threshold.

In summary, the procedure for enlisting a state includes signing of an MoU between the FGN and the state, developing the social register, and aggregating the social register to the National Social Register. At least, 30 percent of poor households in the social register is selected. This is World Bank's condition for the transfer. Households benefit from cash transfer

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1) ICIR, “National Cash Transfer Programme”.

The National Social Register enables every state to have access to its own register, but NASSCO has access to the entire register. The social register is hosted in the state ministry of planning.
but collected by individuals who are mostly women as caregivers.

Funding for the implementation of the NCTP draws on three major sources. First, the initial take-off fund for the cash transfer programme was drawn from statutory budgetary allocation. The sum of N500 billion has been allowed for the NSIP in the national budget for 2016, 2017, and 2018. See table 6 below:

In each year, the sum (N500 billion) allowed for NSIP represents 8.22 percent in the 2016 budget of change (N6.08 trillion), 6.72 percent in the 2017 budget of recovery and growth (N7.441 trillion), and 5.81 percent in the 2018 budget of consolidation (N8.612 billion). Out of the sums approved, N80 billion and N140 billion were released for NSIP in 2016 and 2017, respectively. There are no reports regarding the sums released in the 2018 national budget. Also, the exact sum utilized for the cash transfers is not known available, but media report says N10 billion has been disbursed to beneficiaries of the cash transfers programme.

The FGN and the World Bank signed a Financing Agreement dated January 27, 2017. Thus a Credit Facility ($500 million) has been provided by the World Bank.

It is important to note that recovered assets now form part of the sources of fund for Nigeria’s national budget since 2017.

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The FGN and the World Bank signed a Financing Agreement dated January 27, 2017. Thus a Credit Facility ($500 million) has been provided by the World Bank towards the cash transfers programme. This sum has been available since October 2017, but not yet accessed due to procedural requirements, such as the satisfactory utilization of budgeted FGN funds. $100 million out of the World Bank loan ($500 million) will be used to set up NASSCO, while the balance $400 million will go into disbursement and establishment of the register. Third, the MOU signed between the FGN, Swiss Government and the World Bank on the recovered Abacha loot ($322.5 million) requires that the entire sum be applied on the cash transfers programme.

The World Bank loan ($500 million) has been linked to the recovered Abacha loot ($322.5 million) in utilization. To avoid crash of failure in the

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NCTP’s Funding Sources

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Fed.Govt. Budget</th>
<th>NSIP Budget</th>
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</thead>
<tbody>
<tr>
<td>2016</td>
<td>6.080tn</td>
<td>500bn</td>
</tr>
<tr>
<td>2017</td>
<td>7.441tn</td>
<td>500bn</td>
</tr>
<tr>
<td>2018</td>
<td>8.612tn</td>
<td>500bn</td>
</tr>
</tbody>
</table>

Source

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Compiled from various sources

NCTP, for every 80 percent transfer of Abacha loot ($322.5 million), 20 percent of the World Bank loan ($500 million) must be utilized. Therefore, both fund sources have placed in counterpart arrangement. In effect, neither the Abacha loot ($322.5 million) nor the World Bank loan ($500 million) has reached the NASSCO.

It is important to note that recovered assets now form part of the sources of fund for Nigeria’s national budget since 2017. The recovered Abacha loot (£73 million) from UK in January 2018 would be applied to the 2018 national budget. Recovered asset included as revenues in the 2018 national budget is N512 billion. The sum of N120 billion is drawn from the recovered loot to fund the rehabilitation of 36 roads across the country in the approved 2018 budget. This suggests that the recovered Abacha loot ($322.5 million) has been budgeted. However, the sum was not earmarked in the budget, hence moral and legal questions are being raised. For example, the House of Representatives had passed a resolution urging the FGN to halt plans to distribute the recovered Abacha loot ($322.5 million) to 302,000 households in 19 states with database because it will leave out the poor in other states not captured in the register for no fault of theirs.

Further to this, the House of Representatives had proposed to pass a bill for an Act to allocate the recovered Abacha loot ($322.5 million) for the funding of Ajaokuta Steel Company and Railway line(s) projects across the country. In the opinion of the federal lawmakers, the decision to transfer the recovered Abacha loot ($322.5 million) was in breach of subsection 1 of section 12 of the Nigerian 1999 Constitution (as amended). This section mandates the National Assembly to ratify all treaties and agreements reached by the FGN. By implication, the recovered Abacha loot ($322.5 million) has extended the NCTP coverage.

NCTP Coverage

The eight pilot States engaged in December 2016 were Bauchi, Borno (IDPs), Cross River, Ekiti, Kwara, Kogi, Niger, Osun and Oyo. With the second and third batches, the number of benefitting states had increased to 19 or 20 (including Borno IDPs). The take-off point of the recovered Abacha loot ($322.5 million) is the number of states that have already enlisted in the programme. The states are Adamawa, Anambra, Bauchi, Benue, Borno (IDP), Cross river, Ekiti, Gombe, Jigawa, Kaduna, Kano, Katsina, Kogi, Kwara, Nassarawa, Niger, Osun, Oyo, Plateau, and Taraba. Thus far, 455,857 Poor and Vulnerable Households (PVHHS) have been linked to the database of the benefitting states through the National Social Register. NASSCO says the remaining 16 states are yet to meet the

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requirements for enlisting in the social register. Thirty-three states have started activities, while 3 states have not started activities in going to the field. Also, Bayelsa and Rivers have just finished training, while Delta and Edo have commenced training. Sokoto, Kebbi and Zamfara have already turned their step down. With the return of normalcy to Borno State, people are being trained to go into communities to draw up the data.

In summary, 292,186 are in readiness for the transfer of recovered Abacha loot ($322.5 million). 455,857 PVHHs have been enlisted in the National Social Register, 21 state have established their cash transfer offices, and 217 LGAs have established their cash offices. 20 states (including Delta and Imo to make 22), have uploaded onto the database of the National Social Register. The number of benefitting households is also increasing. For example, 12 LGAs (in Oyo) were initially captured for pilot, but more LGAs were later added. In all, the cash transfers programme before the transfer of Abacha loot ($322.5 million) had 292,186 beneficiaries in 20 States (Adamawa, Anambra, Bauchi, Benue, Borno (IDP), Cross river, Ekiti, Gombe, Kaduna, Kano, Katsina, Kogi, Kwara, Nassarawa, Niger, Osun, Oyo, Plateau, and Taraba).

Mode of Cash Distribution

The platform that hosts and validates payments for all components of the NSIP is the Nigeria Inter-Bank Settlement System (NIBSS). Therefore, the sequence of payment is operationally managed by NIBSS. At commencement of the cash transfers programme in December 2016, commercial banks were engaged in opening accounts for beneficiaries (with bank verification numbers). However, due to the hard-to-reach terrain, mobile money operators (MMOs) were later adopted. MMOs help in paying beneficiaries. List of beneficiaries are generated and sent to the Ministry of Budget and Planning for onward transmission to the MMOs who will go to the benefitting communities for payment. MMOs go to the communities with physical cash. There is an element of conditionality in the cash transfer programme. First, noting the high rate of child and maternal mortality in Nigeria, every benefitting pregnant woman who attends antenatal and takes all immunizations gets an additional support (N5,000.00). Second, in addressing the human capital challenge in out-of-school children, the caregiver that has children of school age also gets an additional sum (N5,000.00) when the children are sent to school at least at the basic education level. In both cases, the additional cash is dependent on their fulfilling the conditions. The bi-monthly payment system was adopted for ease of coordination, effectiveness, and reconciliation of account. From December 2016 to March 2018, eight payment were successfully carried out. Conversation is ongoing on making payment via ‘virtual wallet’, for convenience and security of the

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(Forward Ref: Information from the National Cash Transfer Office. 
"Oreh, "How women are benefitting from conditional cash transfer".)
beneficiaries. This is to protect beneficiaries from attacks by armed robbers.

Training

The NCTP implementation entails two streams of training. The first training is for the public officers involved in the programme implementation while the second training targets the benefitting households (in this case, the caregiver who receives the money). NASSCO trains people within the 30 percent local government areas that have been selected. People are trained within the civil service. At completion of the process, NASSCO will start to train the coordinating officers as 'master trainers' in the CBT process. The 'master trainers' are able to understand the CBT concept, and develop CBT plans for their areas. As at May 8, 2018, 2,495 community facilitators had been trained in the 20 participating states to facilitate the formation of cooperatives, skills and financial training. Poor and vulnerable people are being trained through sensitization, education, and monitoring. Also, beneficiaries are being encouraged to adopt a savings culture, form savings groups, and take ownership. Therefore, the NCTP is much more than cash transfer.

NCTP's transparency and accountability mechanisms

Before July 2018, the National Cash Transfer Office has developed an Integrated Management Information and Payment System (IMIPS), a Grievance Redress Mechanism (GRM), and a Service Chart. Particularly, the GRM is intended to address incidents of dissatisfaction and complaints that may arise during the NCTP implementation in the field. This is applied in the case of a non-poor person who is receiving the money. Citizens can report such cases through the electronic platform that will allow questioning of the process. Also, the community members are called to elect a grievance redress officer who would escalate any other issues to NASSCO and NCTO. This mechanism is supported by the Service Charter for the cash transfer programme. Also, the monitoring movement has an electronic audit trail, trailing the money as it moves from the CBN to the beneficiaries.

Based on the MOU, the transfer of Abacha loot ($322.5 million) requires monitoring by international and local organizations (including CSOs).
In effect, the World Bank has the responsibility for monitoring the ‘Funds’ and providing financial reports. Good enough, the FGN has expressed commitment to transparency in the utilization of the recovered Abacha loot (322.5 million) through stringent monitoring. Monitors would be assigned to visit the individual households that have been identified through ‘deliberate targeting’.

The GFAR Principle on accountability states that asset should proceed in a transparent and accountable manner. There are other institutions involved in the monitoring. These include the Government of Switzerland (through the Embassy of Switzerland in Nigeria), and the UK’s DFID (through the ACORN’s MANTRA project). Also, countries like UK, USA, and Island of Jersey are watching to draw motivation for the repatriation of Nigerian funds stashed away in their countries. International organizations, such as ActionAid, are also involved through engagement by the NCTO.

**NCTP’s Transparency and Accountability Mechanisms**

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Chapter Six

Role of Citizens in the CCT Programme in Nigeria

Citizens have a lot of roles to play in the Conditional Cash Transfer Implementation Programme. Citizens can organize themselves into pressure groups of interested stakeholders with a sole aim of engaging the process for its overall success. The pressure groups should not have any political inclinations or prejudices. Once politics is interpreted into the operations of the group, government can decide to shut its door against the group.

The National Cash Transfer Headquarters is domiciled in the Office of the Vice President of the Federal Republic of Nigeria. It is the implementing Base Cash Transfer (BCT). This has to do with basic support for the most vulnerable to help with the smooth consumption with no conditionalities beside being listed in the National Social Registry (NSR). With objectives of improving household consumption and protect assets of beneficiaries, encouraging savings, reducing the vulnerability of poor households and building their resilience to shock.

Expectation from Beneficiaries

- NCTO expect beneficiaries to show their programme ID card for MMO payments
- NCTO expect beneficiaries to attend a minimum of 70% of basic training
- In order to be eligible for top-up, beneficiaries must attend a minimum 70% of the top up training
- NCTO expect beneficiaries to form savings groups
- Beneficiaries must take up support from coaches or mentors
- Beneficiaries must not pay bribes or give any part of their money to staff, community leaders or members. The payment is for their household only
- Any demand for bribe or anyone asking that beneficiaries pay a part of their money should be reported to confidential NCTO hotline (08175189203, 09037714633)

Beneficiaries

- Payment of beneficiaries is happening in 20 States, to 297,973 caregivers; being trained by 2,495 Community Facilitators – (Source: A Brief on the NSIP in Nigeria, June 2018, published NSIO) as the time of this report.
- Payment with the $322m to commence by August 2018 (each beneficiary to receive N10,000 by end of September 2018
- Adamawa, Anambra, Bauchi, Benue, Borno (IDP), Cross river, Ekiti, Gombe, Jigawa, Kaduna, Kano, Katsina, Kogi, Kwara, Nassarawa, Niger, Osun, Oyo, Plateau, and Taraba

$322m

Total amount to be disbursed

N10,000

Total amount each beneficiary will get

20

Total number of states beneficiary

297,973

Total number of caregivers

2,495

Total number of Facilitators

Source: A Brief on the NSIP in Nigeria, June 2018, published NSIO
As at the time of designing this module, more beneficiaries were being enrolled.

FG determined to reach the 36 states.
## Role of Civil Society Organisations (CSOs)

Civil Society Organisations have a lot of roles to play in the Cash Transfer Programme in Nigeria. Some of them are:

<table>
<thead>
<tr>
<th>Role</th>
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<tbody>
<tr>
<td>Monitor the programme to prevent corruption or looting of the funds</td>
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<tr>
<td>Report cases of fraud to apt authorities</td>
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<tr>
<td>Report cases of fraud to apt authorities</td>
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<tr>
<td>Serve as link between beneficiaries &amp; programme</td>
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<tr>
<td>Encourage citizen participation on household uplifting programme</td>
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<tr>
<td>Create awareness on the HUP &amp; GRM Processes</td>
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<tr>
<td>Sensitize the public &amp; beneficiaries on the HUP</td>
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<tr>
<td>Enlighten citizens about the HUP</td>
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<tr>
<td>Encourage them to use the GRM</td>
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</table>

Citizens can write letters to the office of the National Social Safety-Nets Coordinating Office stating their demands. The letter must be with clear objectives of ensuring the success of the programme. Below is a sample letter by a community group seeking information from NASSCO.
The National Coordinator  
National Social Safety-Nets Coordinating Office (NASSCO)  
Office of the Vice President  
Federal Republic of Nigeria  
Abuja

Sir,

REQUEST FOR ACCESS TO SOCIAL REGISTER AND MEETING

We are a group of Nigerians interested in the work you do, and we are wondering if you could be of help to our community that harbours at least 1000 poorest of the poor Nigerians.

We wish to express our gratitude to your office for the continuing cooperation we enjoy as a Community, in Bako Local Government Area of Mudia State in our engagement with the processes under the Social Investment Programme of the Federal Government, and specifically the National Cash Transfer Programme (NCTP).

We are interested in monitoring the activities of NASSCO and hope at the end to provide your office with the outcome of our independent monitoring of the utilisation of funds allocated in the 2018 budget in the cash transfer programme. We are pleased to inform you that the project has now gotten to the phase of undertaking the practical field monitoring exercise.

In the light of this we are writing to request access to the component of the National Social Register used for the NCTP. Specifically, we wish to access:

§ Information on the number of Households/Individuals on the register, disaggregated by location (State, Local Government Area, Community), age, sex, occupation and disability (if available).

Our Monitoring and Evaluation system aims to pick a sample from the register for spot checks at national, state, local government, and community levels and also examine the criteria for selection. To achieve this, we look forward to working closely with your office and the NCTO to ensure a smooth process through all phases of the monitoring exercise.

To this end, we wish to propose the following meeting dates to facilitate the process:
• A stakeholders meeting on the 5th of July 2018 to agree on the indicators for the scorecard to be used in assessing the transparency and accountability components of our processes under the Social Investment Programme, including the creation of the social register. This will be a collaborative process and will also involve other stakeholders.

• A data quality check of the beneficiaries registers on the 26th of August 2018. We can work with either date, depending on your convenience.

We will be grateful to receive the requested information as soon as you can to enable us to execute all other activities around the monitoring on our schedule. We are happy to provide any clarifications required.

Thank you for your usual cooperation and understanding.

Yours faithfully,

Ibrahim Almansur

Wukari Community Head, Bakori Local Government
Chapter Seven
How Citizens Can engage National Cash Transfer Office (NCTO) in Nigeria

Citizens can also engage the National Cash Transfer Office as it is directly responsible for the Conditional Cash Transfer Programme. Its office is located in the Office of the Vice President, Federal Republic of Nigeria. They also have state coordinators of the CCT in all the state capitals. You should locate their offices in your various state capitals. There are also Local Government Contact persons in all local Government Headquarters where the Cash Transfer Programme is implemented.

This Office is very important in the Conditional Cash Transfer Programme for a number of reasons:

- Mining of List from Registry. Data of beneficiaries are mined from the National Social Registry (NSR) of Poor and Vulnerable people
- Beneficiaries orientation. Beneficiaries are sensitized as to the purpose and objective of the cash transfer program and the role of each stakeholder in the project cycle
- Disclosure of beneficiaries list. The list of poor and vulnerable households is disaggregated by community and disclosed the list at the community level.
- Collection of Beneficiaries Data. Cash Transfer Facilitators (CTFs) collects caregivers and alternates data (names and NSR numbers) using a template provided
- Identification of caregivers. Members of selected Households agree on who is the caregiver and alternate without interference of NCTO, SCTU or CTFs
- Establishment of Beneficiary Database. Beneficiaries data are entered into the system by State Offices and shares with NCTO for confirmation.

However, there are some critical information or data you may need a citizen or community that you still have to reach out to Abuja. You may have to resort to writing a letter or making telephone calls to their cell phone numbers:
7.2 Sample letter to National Cash Transfer Office requesting for data and information

The National Coordinator
National Cash Transfer Programme
Office of the Vice President
Federal Republic of Nigeria
Abuja

Dear Sir,

REQUEST FOR REGISTER OF BENEFICIARIES AND MEETING

I write on behalf of leaders of Ozobulu Community where we have 510 poorest of the poor persons currently on the beneficiaries list of the National Cash Transfer programme. We wish to express our gratitude to your office for the continuing cooperation citizens enjoy with your office when they seek information and assistance.

We wish to inform you that in the last five months, CCT beneficiaries have not received anything and we also feel that we need to engage your office to monitor the 2018 budget allocation to the National Cash Transfer Programme put at N5.6billion and we intend to monitor its use in our community.

We are pleased to inform you that in our last town hall meeting, we agreed to undertake the practical field monitoring of this year's budget for CCT in our community.

Hence, we hereby formal request for the register of beneficiaries and related data. The information we require is as follows:

a. Data on Beneficiaries
   · Information on the number of Households/Beneficiaries in the cash transfer programme disaggregated by: age, sex, location, occupation and disability (if available)

b. Date on Grievance Register
   · Information on the number and types of grievances reported
   · Number and type of grievances investigated
   · Number and type of grievances completed

c. Information on Funds from Government
   · Total amount received by the NCTO for 2018 financial year
   · Total amount disbursed so far to your office for the exercise.
   · Total amount of money allocated to Ozobulu community

d. Latest version of the performance indicator reference sheet for the cash transfer programme.
We will appreciate getting the register and information requested above as soon as possible to enable us to execute all other activities around the monitoring on schedule. We are happy to provide any clarifications you would need from us.

Thank you for your usual cooperation and understanding.

Yours faithfully,

Mr. Wilson Obiakor
Community Leader, Ozobulu Community.
Key Implementation Challenges facing CCT

It is not all roses with the implementation of Conditional Cash Programme. It also comes with its challenges as could be learnt from both within and other climes.

As is often the case with most programs, there is a gap between how the program is implemented in the frontlines of engagement with the beneficiaries and the way the program was designed to be implemented at the local level. In some cases, the majority of the Parent leaders in the benefitting households and the beneficiaries were much less aware of the mechanisms of the Grievance Redress System than would have been ideal in order for the program to make full use of the GRS. This is usually, partly due to lack of awareness and partly due to the lack of expectations that the GRS would yield timely results.

Civil society organizations have always been known to provide an important role in monitoring the functioning of the CCT and are recorded in several instances as a channel of intermediation between the families of beneficiaries and the officials of the CCT. CSOs were either explicitly implementing projects that aimed to monitor the functioning of the CCT by engaging with the community or were, alternatively, information gatherers from the community of beneficiaries through regular engagement with them by convening Family Development Sessions or providing other pastoral services. There is usually a level of trust between the beneficiaries and the CSOs that had been harder to establish between program authorities, municipal links, and the beneficiaries. This usually bring in some mutual suspicion between the authorities and Civil Society Organisations. Resort to democratic norms is helping the resolves the differences between those in authority and CSOs and is impacting positively on CCT programmes all over the world. Nigeria is a classical case where authorities are evidently working with CSOs to achieve success of the CCT programme.

Key Implementation Challenges Facing CCTPs

CCTPs involve many administrative challenges. CCTPs involve a large number of beneficiaries distributed over wide geographical areas. There are large budget outlays, with staff and management information systems to identify and register beneficiaries, verify compliance, make payments, and keep information and records up-to-date. In addition, they require significant amounts of interagency coordination given that while the benefit administration is usually done by a social assistance agency of the government, the services associated with the conditions are provided by other departments/agencies. Coordination between national and local government bodies is usually needed. The communication and consultation needs are large given the visibility of the programmes.
Assessing Performance of Integrity Management

A comprehensive methodology for assessing soundness and performance of integrity systems in CCTPs is being developed by Transparency International. Economic Equality in Latin America (EELA) started as a pilot project in 2008 followed by EELA II from 2012–2014. The projects focused on transparency and accountability in conditional cash transfers in seven Latin American countries (Argentina, Bolivia, Colombia, Guatemala, the Dominican Republic, Honduras, and Peru). They developed a methodology for use by civil society organizations to assess vulnerability of CCTPs to integrity risks and then used the evidence to engage with implementing authorities to improve integrity. It is hoped that the methodology can be adapted for application in any cash transfer program at the national level. The projects results are reported in the report titled “Conditional Cash Transfers in Latin America: Promoting Transparency and Accountability” (Gamba 2015).

Key elements of the Transparency International methodology are as follows:

Identification of the most vulnerable components of the CCTP where threats to integrity are more likely. The vulnerability assessment is done using a questionnaire with guiding questions covering eight indicators (shown in Table 3).

Analysts, usually TI country chapter staff, complete the questionnaire by assigning a score from 1 to 5 for each question and noting observations and justifications. The result is a ranking of components by vulnerability to integrity risks under five categories: high; medium- high; medium; medium-low; and low.

Stakeholder and mapping stage. At this stage the focus is on stakeholders in the most vulnerable components identified in the previous stage and examining the relationships among the stakeholders. This allows identification of where the risks are and which institution is responsible or most affected by those risks. Discussion can then focus on remedial measures.
<table>
<thead>
<tr>
<th>Dimension Assessed</th>
<th>Type of Indicator</th>
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</thead>
<tbody>
<tr>
<td><strong>Integrity Mechanisms</strong></td>
<td>1. <em>Transparency (T)</em>. Refers to possibilities (law and/or policy driven) that are available to stakeholders for accessing information concerning the CCTP.</td>
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<td></td>
<td>2. <em>Accountability (A)</em>. Refers to direct control mechanisms among the participants in the process (particularly the beneficiaries) as well as the information exchange mechanisms they use.</td>
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<td></td>
<td>3. <em>Horizontal Control (HC)</em>. Refers to the degree of direct oversight exercised by state institutions and agencies that are independent from the CCTP.</td>
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<td></td>
<td>4. <em>Vertical Control (VC)</em>. Refers to the degree of oversight exercised by citizens, media, and CSOs on the practices and procedures of the component.</td>
</tr>
<tr>
<td><strong>Integrity Mechanisms Performance</strong></td>
<td>5. <em>Regulation</em>. Existence of formal rules for the component as well as the enforcement of such rules in practice.</td>
</tr>
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<td></td>
<td>6. <em>Capacity</em>. Degree to which authorities have adequate resources (technical, financial, and human) for achieving objectives.</td>
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<td></td>
<td>7. <em>Effectiveness</em>. The ability to comply with the objectives and achieve the desired results.</td>
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<tr>
<td></td>
<td>8. <em>Efficiency</em>. The efficient use and administration of available resources to meet their intended purpose.</td>
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</table>

*Source: Brigitte Rohwerder's compilation using the information in (Gamba 2015)*

Several international studies of control and accountability mechanisms in CCTPs found that fraud, errors, and corruption remain problematic despite state-led measures (see bibliography). There is a need, therefore, to complement state-led efforts to manage integrity risks within CCTPs with other mechanisms that directly engage beneficiaries of CCTPs and citizens more widely, including the use of social accountability approaches.
Evidence from implementing countries shows that CCTPs have positive outcomes in the intended areas. Poverty alleviation and other development impacts of CCTPs have been evaluated in multiple countries. The World Bank has surveyed impact evaluations of social safety nets and noted that CCTPs are one of the most widely evaluated development programs. The survey found that CCTPs have been successful in generating the following poverty alleviation impacts:

- Increased human capital formation. Positive and significant impact on grade promotion and cumulative years of schooling (Brazil, Mexico, Colombia) and significant increase in the number of children completing primary schooling and moving to higher education (Tanzania).

- Stimulating local economies. In Ghana it is estimated that the LEAP program generated up to $2.50 of benefits to local economy for every dollar provided to beneficiaries. Similarly, the multiplicative effects of social safety nets were found in Ethiopia ($2.50), Zambia ($1.79), and Kenya ($1.34).

- Enhanced self-esteem. Beneficiaries have greater self-esteem and higher self-efficacy in the labor market as well as greater optimism for the future (Chile).

- Improved social cohesion. Coverage of schools by the Bolsa Familia program leads to strong and significant reduction in crime in the respective neighborhoods (Brazil). There are positive effects on social cohesion and civil participation (Tanzania).
<table>
<thead>
<tr>
<th>Tool</th>
<th>Definition/Uses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Budget Literacy</td>
<td>Budget Literacy Campaigns are efforts—usually by civil society, academics, or research institutes—to build citizen and civil society capacity to understand budgets in order to hold government accountable for budget commitments and to influence budget priorities.</td>
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<tr>
<td>Campaign</td>
<td></td>
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<tr>
<td>Citizen Charter</td>
<td>Citizen Charter is a document that informs citizens about the service entitlements they have as users of a public service, the standards they can expect for a service (timeframe and quality), remedies available for non-adherence to the standards, and the procedures, costs, and charges of a service. The charters entitle users to an explanation (and in some cases compensation) if the standards are not met.</td>
</tr>
<tr>
<td>Citizen Report Card</td>
<td>Citizen Report Card is an assessment of public services by the users (citizens) through client feedback surveys. It goes beyond data collection to be an instrument for exacting public accountability through extensive media coverage and civil society advocacy that accompanies the process.</td>
</tr>
<tr>
<td>Citizen Satisfaction</td>
<td>Citizen satisfaction surveys provide a quantitative assessment of government performance and service delivery based on citizens’ experience. Depending on the objective, the surveys can collect data on a variety of topics ranging from perceptions of performance of service delivery and elected officials to desires for new capital projects and services.</td>
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<tr>
<td>Surveys</td>
<td></td>
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<tr>
<td>Citizen/User</td>
<td>Citizen/User Membership in decision-making bodies is a way to ensure accountability by allowing people who can reflect users’ interests to sit on committees that make decisions about project activities under implementation (project-level arrangement) or utility boards (sector-level arrangement).</td>
</tr>
<tr>
<td>Membership</td>
<td></td>
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<tr>
<td>Citizens’ Juries</td>
<td>Citizens’ Juries are a group of selected members of a community that make recommendations or actions participatory instruments to supplement conventional democratic processes.</td>
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<tr>
<td>Community Contracting</td>
<td>Community Contracting is when community groups are contracted for the provision of services, or when community groups contract service providers or the construction of infrastructure.</td>
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<tr>
<td>Community Management</td>
<td>Community Management is when services are fully managed or owned by service users or communities. Consumers own the service directly (each customer owns a share) when they form cooperatives.</td>
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<tr>
<td>Community Monitoring</td>
<td>Community Monitoring is a system of measuring, recording, collecting, and analyzing information, and communicating and acting on that information to improve performance. It holds government institutions accountable, provides ongoing feedback, shares control over M&amp;E, engages in identifying and/or taking</td>
</tr>
<tr>
<td><strong>Community Oversight</strong></td>
<td>Community Oversight is the monitoring of publicly funded construction projects by citizens, community-based and/or civil society organizations participating directly or indirectly in exacting accountability. It applies across all stages of the project cycle, although the focus is on the construction phase.</td>
</tr>
<tr>
<td><strong>Community Scorecard</strong></td>
<td>A Community Scorecard is a community-based monitoring tool that assesses services, projects, and government performance by analyzing qualitative data obtained through focus group discussions with the community. It usually includes interface meetings between service providers and users to formulate an action plan to address any identified problems and shortcomings.</td>
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<tr>
<td><strong>Focus Group Discussions</strong></td>
<td>Focus Group Discussions are usually organized with specific goals, structures, time frames, and procedures in mind. Focus groups are composed of a small number of stakeholders to discuss project impacts and concerns and consult in an informal setting. They are designed to gauge the response to the project's proposed actions and to gain a detailed understanding of stakeholders' perspectives, values, and concerns.</td>
</tr>
<tr>
<td><strong>Grievance Redress Mechanism</strong></td>
<td>Grievance Redress Mechanism (or complaints-handling mechanism) is a system by which queries or clarifications about the project are responded to, problems with implementation are resolved, and complaints and grievances are addressed efficiently and effectively.</td>
</tr>
<tr>
<td><strong>Independent Budget Analysis</strong></td>
<td>Independent Budget Analysis is a process where civil society stakeholders research, explain, monitor, and disseminate information about public expenditures and investments to influence the allocation of public funds through the budget.</td>
</tr>
<tr>
<td><strong>Input Tracking</strong></td>
<td>Input Tracking refers to monitoring the flow of physical assets and service inputs from central to local levels. It is also called input monitoring.</td>
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<tr>
<td><strong>Integrity Pact</strong></td>
<td>An Integrity Pact is a transparency tool that allows participants and public officials to agree on rules to be applied to a specific procurement. It includes an &quot;honesty pledge&quot; by which involved parties promise not to offer or demand bribes. Bidders agree not to collude in order to obtain the contract; and if they do obtain the contract, they must avoid abusive practices while executing it.</td>
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<tr>
<td><strong>Participatory Budgeting</strong></td>
<td>Participatory Budgeting is a process through which citizens participate directly in budget formulation, decision making, and monitoring of budget execution. It creates a channel for citizens to give voice to their budget priorities.</td>
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<tr>
<td><strong>Participatory Physical Audit</strong></td>
<td>Participatory Physical Audit refers to community members taking part in the physical inspection of project sites, especially when there are not enough...</td>
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<tr>
<td><strong>Public Expenditure Tracking Surveys</strong></td>
<td>Public Expenditure Tracking Surveys involves citizen groups tracing the flow of public resources for the provision of public goods or services from origin to destination. It can help to detect bottlenecks, inefficiencies, or corruption.</td>
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<tr>
<td><strong>Public Hearings</strong></td>
<td>Public Hearings are formal community-level meetings where local officials and citizens have the opportunity to exchange information and opinions on community affairs. Public hearings are often one element in a social audit initiative.</td>
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<tr>
<td><strong>Public Reporting of Expenditures</strong></td>
<td>Public Reporting of Expenditures refers to the public disclosure and dissemination of information about government expenditures to enable citizens to hold government accountable for its expenditures.</td>
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<tr>
<td><strong>Social Audit</strong></td>
<td>Social Audit (also called Social Accounting) is a monitoring process through which organizational or project information is collected, analyzed, and shared publicly in a participatory fashion. Community members conduct investigative work at the end of which findings are shared and discussed publicly.</td>
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<tr>
<td><strong>User Management Committees</strong></td>
<td>User Management Committees refer to consumer groups taking on long-term management roles to initiate, implement, operate, and maintain services. User management committees are for increasing participation as much as they are for accountability and financial controls.</td>
</tr>
</tbody>
</table>

*Source: World Bank*
About ANEEJ

The Africa Network for Environment and Economic Justice (ANEEJ) is a non-governmental organisations whose goal is to amplify the voice of the weak, the less privileged and the marginalized groups in the society including women and youths, in order to increase their participation in the democratic decision-making process. As its basis, ANEEJ believes in a democratic system for managing human interest and operates within two broad focal areas namely environmental and economic justice. Specifically, ANEEJ implements projects relating to governance and democracy, peace building and conflict resolution, human rights and anti-corruption, environment including water, sanitation and hygiene among others.

ANEEJ worked with over 100 civil society organisations while hosting the Secretariat of the Publish What You Pay (PWYP) Campaign, Nigeria from 2004-2008 and the Nigerian Network on Stolen Assets. The organisation also coordinated CSOs that were involved in monitoring repatriated Late General Sani Abacha loots under the Public Expenditure Management and Financial Accountability Review (PEMFAR), a tripartite agreement between the World Bank, Civil Society and Nigerian governments. ANEEJ in 2003 established the Society for Water and Sanitation (NEWSAN), a coalition of over 300 CSOs working in the area of Water and Sanitation.

ANEEJ is currently engaging the Nigerian government, international community as well as local and international civil society groups on the recovery of stolen assets to finance development. ANEEJ has consultative status with the United Nations and is a member of United Nations Convention Against Corruption (UNCAC) Coalition.

ANEEJ is currently implementing the Transparency and Accountability in recovery and Management of looted Assets (MANTRA) project. It is monitoring the returned $322.5million Abacha Loot being spent on Conditional Cash Transfer Programme of the Federal Government of Nigeria meant for the poorest of the poor.

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