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Citizen Engagement: An Independent Review of the World Bank's Commitments in Nigeria

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Accountability Research Center

About Accountability Research Center (ARC)

The Accountability Research Center (ARC) is an action-research incubator based in the School of International Service at American University. ARC partners with civil society organizations and policy reformers in the global South to improve research and practice in the field of transparency, participation and accountability.

For more information about ARC, please visit the website: www.accountabilityresearch.org.

About Action for Empowerment and Accountability (A4EA) Research Programme

In a world shaped by rapid change, the Action for Empowerment and Accountability (A4EA) research programme focuses on fragile, conflict and violent (FCV) settings to ask how social and political action for empowerment and accountability emerges in these contexts, what pathways it takes, and what impacts it has.

A4EA is implemented by a consortium consisting of the Institute of Development Studies (IDS), the Accountability Research Center (ARC), the Collective for Social Science Research (CSSR), the Institute of Development and Economic Alternatives (IDEAS), Itad, Oxfam GB, and the Partnership for African Social and Governance Research (PASGR). Research focuses on five countries: Egypt, Mozambique, Myanmar, Nigeria and Pakistan. A4EA is funded by aid from the UK government. The views expressed in this publication do not necessarily reflect the official policies of the funder.

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Disclaimer

The findings, interpretations, and conclusions expressed here are those of the authors.

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Acronyms and Abbreviations

A4EA	Action for Empowerment and Accountability
AF	Additional Financing
ARC	Accountability Research Center
BIC	Bank Information Center
CBO	Community-based organization
CDD	Community-driven development
CE	Citizen engagement
CSO	Civil society organization
DFID	Department for International Development
DLI	Disbursement-linked indicator
EE	Enabling environment
ESMF	Environment and Social Management Framework
ESSA	Environmental and Social Systems Assessment
FCV	Fragile, conflict and violent
FRILIA	Framework for Responsible and Inclusive Land-Intensive Agricultural Investments
FY	Fiscal year
GAC	Governance and anti-corruption
GAP	Gender Action Plan
GPSA	Global Partnership for Social Accountability
GRM	Grievance redress mechanism
GRS	Grievance Redress Service
ICT	Information and communication technology
IDP/s	Internally Displaced Person/people
IDS	Institute of Development Studies
IEG	Independent Evaluation Group
IPF	Investment Project Financing
ISR	Implementation Status and Results Report
IVA	Independent verification agent
M&E	Monitoring and evaluation
NGO	Non-governmental organization
OM	Operational manual
OVG	Other vulnerable groups
P4R	Program for Results
PAD	Project appraisal document
PDO	Project development objective
PID	Project Information Document
PMU	Project management unit
RAP	Resettlement Action Plan
RF	Results Framework
RPF	Resettlement Policy Framework
SBMC	School-based Management Committee
SIP	School Improvement Plan
WBG	World Bank Group

Executive Summary

In 2013 World Bank president Jim Yong Kim publicly promised that the institution would improve its engagement with citizens by incorporating beneficiary feedback into 100 percent of projects with identifiable beneficiaries. The goal took formal shape as the 2014 *Strategic Framework for Mainstreaming Citizen Engagement* (CE Strategy), which "incorporates citizen engagement, including beneficiary feedback, specifically in its treatment of inclusion, which entails empowering citizens to participate in the development process and integrating citizen voice in development programs as key accelerators to achieving results" (World Bank 2014:1). World Bank management utilized President Kim's promise as the basis for a new minimum institutional mandate requiring World Bank projects to incorporate at least one project mechanism to engage citizens and one indicator to monitor progress, as well as to report on the indicator by the third year of implementation.

How and to what degree is the World Bank putting its new institutional citizen engagement commitments into practice? This question guides an initiative being undertaken by the Accountability Research Center (ARC) at American University as part of the Institute of Development Studies' (IDS) Action for Empowerment and Accountability (A4EA) investigation into how external actors can best support local processes of and conditions for empowerment and accountability. This report provides a pilot assessment of the first step in this process—the specific citizen engagement (CE) commitments in World Bank projects at the design stage. This kind of in-depth analysis is necessary but not sufficient to assess whether and how the World Bank and government partners actually implement those commitments. Such an assessment of commitments at the project design stage is intended to help design possible national, civil society organization (CSO) strategies to monitor implementation.

For this pilot assessment ARC reviewed the World Bank's Fiscal Year (FY) 2015–17 investment project portfolios for four A4EA priority countries: Mozambique, Myanmar, Nigeria and Pakistan, which covers 57 projects that range from US$19 million to over US$600 million. **The country assessment presented here focuses on Nigeria, which over this three-year period has 16 operations ranging from US$50 million to US$600 million.** In April 2019, ARC and IDS will published a comparative synthesis report on the results from all four country assessments.

This research is one component of A4EA's broader investigation into how external actors, particularly large donors, are supporting empowerment and accountability in fragile, conflict and violent (FCV) settings. Given its institutional clout and the proportion of development assistance the World Bank administers, it is in a unique position to protect and foster the contribution of citizen voice to development effectiveness, as civic space around the world decreases. Therefore, the CE Strategy is particularly relevant for FCV settings because it provides guidance for how large-scale development projects could encourage arenas for collective citizen action, as well as state response capacity, which otherwise might be lacking.

ARC has developed and piloted an assessment tool that examines commitments to CE in World Bank projects. First, the tool covers the World Bank's seven priority areas for citizen engagement, according to the CE Strategy. These include the following:

- Consultation during project preparation
- Collaborative decision-making during project implementation

- Citizen feedback opportunities throughout the project lifecycle
- Citizen involvement in project monitoring
- Grievance redress mechanisms (GRMs)
- Capacity building for CE
- Improved CE monitoring and results reporting.

The approach then expands the scope beyond CE project mechanisms to three additional measures that ARC hypothesizes could potentially facilitate an enabling environment for CE. These include the following:

- **Measures for proactive social inclusion** (i.e., related to gender, disability, ethnicity, age, migrant status, etc.) in CE efforts
- **Third party monitoring** for project results and citizen feedback findings—which could inform CE if accompanied by
- **Proactive public information disclosure** of project results and findings from CE efforts and the project progress.

The goal of the overall analysis is to determine if a project commits to seek a strategic approach to CE, meaning the degree to which there is the potential for synergy across the different tactics incorporated. This assessment attempts to distinguish between projects that apply the CE framework with a minimalist, "tick the box" approach, and projects that commit to pursuing multiple CE approaches ("thin" versus "thick" approaches, in the language of a recent Independent Evaluation Group (IEG) study). Part of this process includes applying an original Citizen Engagement Density Scale that ranks the varied "thickness" of project commitments to CE across five categories (Robust, Comprehensive, Intermediate, Weak and Low).

The key overarching findings from the Nigeria review include:

- The ARC CE Density Scale shows that 10 of 16 (62 percent) of Nigeria FY15–17 projects rank as Robust (nine) or Comprehensive (one), meaning that they commit to at least six CE areas and at least one mechanism for a potential enabling environment for CE. This reveals consistent application of the CE agenda in project design across a majority of the Nigeria portfolio.

- The CE Density Scale also shows that the density of a project's commitments to citizen engagement increases over time, from FY15 to FY17.

- The 12 of 16 Nigeria projects that proposed at least one monitoring indicator to measure the extent and spectrum of CE show relative consistency. Of the four Nigeria projects that do not include at least one CE indicator, three were approved in FY15 and the final one is an additional phase of a 2015 project, the first year of the new protocol.

- Fifty percent of the Nigeria portfolio commits to some kind of proactive, public information disclosure. Of these eight projects, four specifically commit to disclosing data collected by third party monitors. Therefore, 25 percent of the Nigeria projects will disclose information to the public that has been generated by entities outside of project management. This shows that the majority of projects (75 percent) focus on reporting up to Bank management and not out to the public.

- The eight projects that commit to public disclosure of project results also commit to utilizing third party monitoring, citizen-led monitoring and measures for proactive inclusion, although not necessarily related to commitments for disclosure.

- Projects consistently commit to addressing social inclusion concerns related to gender, but not to other dimensions of social exclusion.

I. Introduction

1.1 Background

"We must become a better listener," the World Bank's president Jim Yong Kim acknowledged during his keynote speech at the World Bank/IMF 2013 Annual meetings. He continued: "Last year we had beneficiary feedback on 34 percent of our projects. We promise that for our projects with clear beneficiaries, we will get feedback—from every single one of them, 100 percent" (Kim 2013). By announcing this to an audience of high-level government officials, President Kim committed the World Bank to improving how it engages with the people affected by its projects and to developing measurements of these achievements.

In 2014, World Bank management translated Kim's public promise into a set of corporate requirements for citizen engagement in Investment Project Financing (IPF) operations. IPFs are the Bank's leading lending instrument and are used for long-term operations (i.e., periods of 5 to 10 years) across all sectors, but are primarily concentrated in infrastructure, human development, agriculture, and public administration (World Bank 2018d). The new CE requirements oblige IPF projects with "identifiable beneficiaries" and approved between Fiscal Years (FY) 2015 and 2017 (between July 1, 2014 and June 30, 2017) to: (1) incorporate a least one citizen engagement (CE) mechanism, (2) integrate at least one indicator to monitor CE, and (3) report on the CE indicator by the third year of project implementation (World Bank 2014).

To provide operational guidance for meeting the new institutional CE mandate and to more systematically incorporate citizen engagement into operations, the World Bank then produced the *Strategic Framework for Mainstreaming Citizen Engagement* (abbreviated in this report as "CE Strategy").[1] As laid out in the CE Strategy, the World Bank envisions citizen engagement as

> the ***two-way interaction between citizens and governments*** or the private sector within the scope of [World Bank Group] WBG interventions—policy dialogue, programs, projects, and advisory services and analytics—that gives citizens a stake in decision-making with the objective of improving the intermediate and final development outcomes of the intervention (Manroth et al 2014:8).

This definition establishes World Bank–fostered CE as *reciprocal* and *bounded*. It is *reciprocal* because it requires government to respond to citizen demands and not simply extract their input for consideration. Yet it is *bounded* because it applies only to government-citizen interactions "within the scope of WBG interventions" and therefore stops short of considering the implications for broader citizen-state relations and accountability.

How and to what degree is the World Bank actually embedding mechanisms for citizen engagement in project design? In 2017, the Accountability Research Center (ARC) at American University, a member of the Institute of Development Studies' (IDS) Action for Empowerment and Accountability (A4EA) research program, launched a two-track approach to monitoring and advocacy regarding the World Bank's fulfillment of its CE agenda.[2] This research comprises one component of A4EA's broader investigation into whether and how external actors, particularly large

donors, are supporting empowerment and accountability in fragile, conflict and violent (FCV) settings. A4EA chose to focus this component on the World Bank because, even as civic space around the world is restricted, the World Bank has the potential to support government counterparts to protect and foster the contribution of citizen voice to development effectiveness. ARC's World Bank CE research therefore encompasses a two-track monitoring and advocacy approach:

- The first track aims to independently monitor *whether and how* the World Bank is integrating CE into project design. It relies on a desk review of publicly available documents to identify how individual projects commit to incorporating CE throughout the project life-cycle. This report contributes to this first track.

- The second track investigates project implementation, utilizing findings on project design commitments to CE to launch partner-led action research. It aims to monitor *how* CE commitments are *actually* being carried out in specific World Bank projects of concern to stakeholders and requires extensive field research that is informed by local knowledge.

To guide the independent monitoring process, ARC developed an assessment tool to identify the nature of the World Bank's commitments to citizen engagement as incorporated into project design. ARC's assessment tool utilizes the official project documents made public on World Bank's website to identify whether and how projects commit to

- **citizen engagement mechanisms throughout the project lifecycle:** i.e., public meetings, satisfaction surveys, participatory monitoring throughout the project life cycle.

- **mechanisms that could facilitate an enabling environment for CE:** i.e., third party monitoring, procedures for social inclusion, and plans for proactive information disclosure.

By examining project commitments to specific CE activities along with mechanisms that strengthen the enabling environment for CE, the analysis seeks to answer two overarching questions: (1) To what degree do World Bank projects demonstrate a commitment to minimum standards for informed CE? and (2) To what degree do projects go beyond a minimalist "tick the box" approach and demonstrate that there is both depth and specificity in individual CE commitments and a potential for synergy across the range of CE commitments?

To pilot the assessment tool, ARC undertook a desk review of all publicly available program documents for the IPF portfolios (FY15–17) in four A4EA priority countries: Mozambique, Myanmar, Nigeria, and Pakistan, jointly selected with A4EA funder, the Department for International Development (DFID). These four country portfolios include a total of 57 projects that range from US$19 million to over US$600 million. This research has produced four independent, in-depth reports (including this one) for use by local CSOs, researchers, and policy-makers that capture each country's unique findings, alongside a synthesis report covering the four countries' findings. To then test how the CE commitments are implemented, ARC and its in-country partner, the Bank Information Center (BIC), conducted fieldwork in Myanmar on three of the FY15–17 projects that are at the most advanced stages of implementation. The country assessment presented here focuses on Nigeria, which over this three-year period has 16 active operations that range from US$50 million to over US$600 million

This A4EA research recognizes that the World Bank, in contrast to other large-scale donors, rarely finances initiatives designed to target public accountability and empowerment. Instead the institution takes a more indirect approach to empowerment and accountability by funding

government-led participation in "invited" spaces (Mansuri and Rao 2013:xi) created within projects whose main objectives are typically not empowerment related. The World Bank's approach to civic engagement has been described in the literature as *induced participation* because it results from government- and donor-organized and/or funded efforts to which citizens are invited to participate and may be bureaucratically managed (Mansuri and Rao 2013:xi).[3]

Although induced participation continues to dominate the World Bank's approach to CE, the institution has also published extensive research that documents the shortcomings, including widespread patterns of "elite capture" of induced participatory efforts (Mansuri and Rao 2013). Indeed, the CE Strategy openly acknowledges the literature documenting these risks (Manroth et al. 2014:95; see also Haque 2008 and Gugerty and Kremer 2008). However, in the World Bank's current efforts to mainstream CE in operations, it remains unclear whether or how projects address this key risk in design or implementation. The challenges posed by the World Bank's primary approach to citizen participation underscores the relevance of independent assessment of whether and how meaningful spaces for citizen engagement are actually created in practice.

This introductory section continues by detailing the 2014 CE Strategy and its origins. It then delves into the Nigeria assessment findings beginning with quantitative results at the portfolio level, including ARC's CE Density Scale, and then a qualitative analysis of each of the commitments.

1.2 Citizen engagement and the World Bank

The World Bank's 2014 CE Strategy is the outcome of more than 45 years of evolving engagement between the World Bank and civil society (for more in-depth discussion see Fox and Brown 1998; Davis 2002; World Bank 2005; Bebbington et al 2006; World Bank 2007; Manroth et al. 2014; World Bank 2018c). Key precursors include the following:

- Adoption of Social Safeguard policies: In 1980, setting protections and compensation standards for people affected by project-caused involuntary resettlement and 1982, setting mandated protections for indigenous peoples.

- Publication of *Putting People First: Sociological Variables in Rural Development* (1985), the first World Bank publication concerned with the roles of people and local associations in development projects.

- Formation of the Participatory Development Learning Group (1990), the first body convened to develop approaches and practices for participation in World Bank operations.

- Establishment of the Inspection Panel (established 1993, operationalized 1994), an independent accountability mechanism to which people who believe they have been adversely affected by World Bank-financed operations (specifically those financed by the International Bank of Reconstruction/International Development Association [IBRD/IDA]) can bring their concerns. The panel determines whether World Bank projects have complied with their own policies and procedures.

- Publication of the 1996 Participation Sourcebook, the World Bank's first official how-to publication for incorporating participatory approaches into projects.

- Formation of a Social Development network and Department (1997).

- Development of guidelines for consultation with civil society (1999, updated 2002).

- Launch of the Social Development Strategy (2005) and Governance and Anticorruption (GAC) Strategies (2007 and 2012), which prioritized social accountability and demand-side governance.

- Establishment of the Global Partnership for Social Accountability (GPSA) in 2012 to build capacity for CSOs to engage in social accountability initiatives.

The overall objective of the 2014 CE Strategic Framework is

> to facilitate mainstreaming of CE in WBG-supported policies, programs, projects, and advisory services and analytics to improve their development results and, within the scope of these operations, to strengthen engagement processes between governments and the private sector and citizens at the national, regional, local, or sectoral level, as applicable (Manroth et al. 2014:1).

The World Bank claims that the CE Strategy goes beyond previous efforts because it is the first formalized framework, with institution-wide reach, that provides comprehensive guidance for engaging citizens from a project's inception to its completion (Manroth et al 2014:6).

The CE Strategy outlines the following key categories of citizen engagement:[4]

1. **Consultation.** Formally, the term consultation in the context of World Bank projects captures engagement with citizens in the design or project preparation stage before an operation has been approved by the World Bank Board. The Bank describes the objectives for citizen consultations to include receiving input about the design and implementation arrangements of a development program or project, in order to contribute to improved results and sustainability. Distinct from dialogue, the World Bank defines consultation as "a more structured exchange in which the convener commits to 'active listening' and to carefully consider the comments, ideas, and recommendations received. … Common consultation methods include public hearings or meetings, focus group discussions, household surveys and interviews, electronic consultations, and advisory/expert groups." They can also include "more informal structures at the local level, such as village councils and women's groups" (Manroth et al. 2014:42).

2. **Collaborative decision-making.** This process goes beyond consultation and integrates citizens directly into decision-making processes. The goal is to make decisions more responsive to citizens' needs and improve the sustainability of program and project outcomes through increased citizen ownership. Mechanisms include "citizen/user membership in decision-making bodies, integrity pacts, participatory planning and budgeting, and citizens' juries" (Manroth et al. 2014:43).

3. **Collecting, recording, and reporting on inputs from citizens.** This refers to citizen feedback collected periodically during and after implementation on different dimensions of provided services, including but not limited to effectiveness, inclusiveness, quality, delivery time, transaction costs, targeting, resource utilization, or engagement processes. Some tools utilized in projects to capture citizen inputs include "satisfaction surveys, focus group discussions, hotlines, community scorecards, citizen report cards, or SMS/online feedback" (Manroth et al. 2014:44).

4. **Complaint and grievance redress mechanisms (GRMs).** These are complaint systems through which project-affected peoples can raise concerns, queries, or clarifications related to implementation and through which complaints and grievances are addressed. This analysis focuses exclusively on project-specific GRMs, which are intended to be designed to be context-specific and not the more generic Grievance Redress Services (GRS) offered via the Bank's online portal (Manroth et al. 2014:45).

5. **Citizen monitoring, evaluation, and oversight.** Citizen monitoring goes beyond citizen feedback processes and directly involves citizens in monitoring service delivery, revenues, budget execution, procurement, contract awards, and reform policies. The philosophy behind such intensive citizen involvement is that it can increase transparency, improve efficiency of service delivery and budget execution, and reduce opportunities for corruption. Some commonly used mechanisms for citizen-led monitoring include "public expenditure tracking surveys, social audits, or citizen report cards" (Manroth et al 2014:47).

6. **Capacity building for CE.** This capacity building is specifically designed for citizens, CSOs, communities, government officials, and national accountability institutions to strengthen their engagement and participation in project implementation (service delivery, natural resource management, public financial management, and/or community driven development (CDD) projects).[5] This is considered particularly necessary for World Bank–supported operations where CE approaches are introduced for the first time and include a focus on building government capacity for sustainability of engagement processes beyond the life of a project (Manroth et al. 2014:50).

7. **Improved monitoring and results reporting.** The CE Strategy states that a key objective of the framework is to develop a better understanding of and monitoring of CE outcomes in World Bank-supported operations (Manroth et al. 2014:54–55). The Strategy emphasizes that projects would benefit from incorporating dedicated CE indicators into monitoring systems, especially within their Results Framework. (The World Bank's definition of the project Results Framework, its purpose and the mandates for public disclosure will be elaborated upon in Section 2.2.7). Furthermore, the CE Strategy suggests incorporating third party monitoring to ensure independent, accurate reporting.

The CE Strategy's status as a "strategy" rather than a "policy" means that on its own, it is not mandatory for project teams to implement it. The CE Strategy recognizes this and therefore links the recommended approaches to mandatory World Bank policies, such as those related to social and environmental safeguards. Specifically, "social safeguards" are policies that operations must follow when specialists determine that the projects will, or are likely to, work with either of two specific vulnerable populations—Indigenous Peoples or beneficiaries that may be required to involuntarily resettle. When fulfilling safeguard requirements, two CE activities—consultation during project preparation and GRMs for project implementation—become mandatory. Therefore, safeguards are viewed as an important and logical "entry point" for CE activities, which can then lead to additional opportunities to integrate and expand CE measures beyond the limited requirements set by the strategy. Furthermore, the CE Strategy identifies additional context-specific opportunities for scaling up CE.

The World Bank accompanied the release of the CE Strategy with a "corporate commitment" that "100 percent of Investment Project Financing with IBRD/IDA funding with clearly identified beneficiaries" incorporate citizen engagement by FY 2018 ((World Bank 2018a). IPF is the World Bank's leading lending instrument and is utilized for long-term operations (i.e.,

periods of 5–10 years) across all sectors, but is concentrated in infrastructure, human development, agriculture, and public administration (World Bank 2018d). The corporate commitment specifies that IPFs must meet the following three benchmarks:

A Incorporate a **minimum of one mechanism** designed to engage beneficiaries in the specific context of the project.

B Integrate a **minimum of one indicator** to monitor a particular aspect of citizen engagement during project implementation.

C Report on the **beneficiary feedback indicator** by the third year of implementation (World Bank 2018a).

Furthermore, to be considered an acceptable CE indicator, a project indicator must meet one of the following criteria:

- Clearly capture citizen feedback and in so doing report "whether there is a tangible response to close the feedback loop"; or
- Monitor the extent to which citizens are involved in decision-making related to project design, implementation and oversight (World Bank 2018a).

It is essential to recognize that the accompanying corporate commitment is what now makes CE compulsory for IPFs. Civil society observers acknowledge that this represents important progress; yet they have also expressed concern that project compliance with these minimal requirements will not ultimately lead to the operationalization of CE in World Bank projects. The minimal requirements, which oblige projects only to incorporate a single CE mechanism and indicator, allows for a "tick the box" approach to compliance. Therefore, World Bank monitoring risks falling short of capturing the extent to which projects are actually fulfilling the guidance laid out in the CE Strategy. Furthermore, the fact that projects are not responsible for reporting on results until the third year of implementation significantly limits the prospects that any citizen feedback collected will meaningfully inform implementation decisions.

1.3 Independent monitoring of CE in World Bank program design

In this context, ARC developed a methodology to determine both *whether and how* projects operationalize the World Bank's commitments to CE in ways that tangibly contribute to empowerment and accountability. ARC's assessment tool combines two elements: an independent assessment of how projects commit to apply the World Bank strategy's own approach and an assessment of projects through the lens of additional relevant criteria.

The first element is based on the seven commitments laid out by the World Bank for itself, incorporating each of the areas of CE prioritized in the strategy (see Section 1.2), and investigating each area, utilizing the criteria specified in the corporate commitments.

Second, the tool incorporates three additional areas that have the potential to create an enabling environment for CE. These include the following:

- Measures for proactive social inclusion (i.e., related to gender, disability, ethnicity, age, migrant status, etc.) in CE efforts.

- Third party monitoring and verification for project results and citizen feedback findings. The World Bank defines third party monitoring as: "monitoring by parties that are external to the project or program's direct beneficiary chain or management structure to assess whether intended outputs, outcomes, and impacts have been achieved by the project. Third party monitoring is mainly used to provide an independent perspective on project or government performance. It can be conducted by CSOs, think tanks, academic institutions, media, or private firms. These organizations generally have greater skills for monitoring than community representatives" (Van Wicklin and Gurkan 2013:2).

- Proactive disclosure of the results from CE efforts and project progress, as well as results beyond the Bank's minimal requirements.

By examining project commitments across these 10 areas, the analysis seeks to answer two overarching questions:

1. To what degree do World Bank projects demonstrate a commitment to minimum standards for informed CE?

2. To what degree do projects go beyond a "tick the box" approach and demonstrate that there is both depth and specificity in individual CE commitments, and a potential for synergy across the range of CE commitments?

1.3.1 Data collection: application of the assessment tool

ARC's assessment tool relies on publicly available World Bank project documents that lay out project plans, strategies and commitments that have been approved by the Bank's Board. The principal documents utilized in the analysis include (where available) the Project Appraisal Document (PAD), the Project Information Document (PID), the Integrated Safeguards Sheets, the Environmental and Social Management Framework (ESMF), and related social safeguard documents (Resettlement and Indigenous People's Frameworks) when applicable. The World Bank requires that all the above-mentioned documents be publicly disclosed via its online Operations portal.

In principle, the assessment would also include operational manuals (OMs), which all projects develop after approval to describe and codify the plans for implementation that are meant to achieve project goals. The OM is the primary resource for members of the public and government agencies to learn how project goals are translated into concrete actions. For government–society engagement, the OM translates Bank project commitments into specific actions, processes and benchmarks in each national context. This "translation" is also key for CSOs and citizens who want to observe or monitor how a project is functioning. is also key for CSOs and citizens who want to observe or monitor how a project is functioning. However, the World Bank does not have an institutional mandate that OMs must be disclosed, and therefore they are typically not available to the public. In the case of Nigeria, as far as this investigation could determine, only one of the 16 projects, the Development Finance Project (FY15) made its OM accessible/available to public. This means, in practice, that public access to the primary operational document that details how a project will meet the approved objectives is left to the client government's discretion. When government agencies do not proactively disclose their specific decision-making processes or project rules and performance benchmarks, it has major implications for the prospects for informed citizen engagement and accountability.

ARC's project assessment process is never automated, and there is a strict policy of secondary or peer review to avoid subjective decision-making about the depth and detail of individual CE commitments. Once the data have been collected from the publicly available Bank documents, they undergo quantitative and qualitative analysis. The processes for each are explained in the sections below.

1.3.2 Quantitative analysis: establishing a CE Density Scale

To answer the question of *whether* World Bank projects are operationalizing institutional commitments to CE, ARC developed and piloted a Citizen Engagement Density Scale that considers the seven World Bank priority CE indicators and three enabling environment (EE) indicators discussed above. The density scale builds from IEG findings that

> "thick" approaches—those combining multiple tools to enable collective action and public sector responsiveness—are more promising than "thin" approaches—those that are not matched with vertical integration of independent monitoring and oversight or do not include support to increase a government's capacity to respond (World Bank 2018:xiii).

A thick approach to CE commitments combines a project's inclusion of the various CE activities laid out in the Bank's strategy with mechanisms or practices that could create an enabling environment to further advance citizen action. The creation of an enabling environment is facilitated through the proactive social inclusion of marginalized groups in consultation processes; and the inclusion of independent/external monitoring with public disclosure of results. While the thick versus thin distinction may be intuitive and subjective, this desk review attempts to capture greater nuance by classifying the range of density of commitments according to five different categories: **Robust, Comprehensive, Intermediate, Weak, and Low**. Table 1 depicts the combined CE and EE numerical criteria for each level.

Table 1. CE Density Scale

ROBUST			COMPREHENSIVE			INTERMEDIATE			wWEAK			LOW		
CE	+	EE	CE	+	EE	CE	+	EE	CE	+	EE	CE	+	EE
7		2–3	7		0–1	6		0	4		0–1	2		0–1
6		3	6		1–2	5		0–2	3		0–2	1		0–2
			5		3	4		2–3	2		2–3	0		0–3
						3		3	1		3			
Key	CE = Citizen Engagement Indicators; Maximum = 7					EE = Enabling Environment Indicators; Maximum = 3								

A project's rating on the scale depends on a combination of its CE and EE commitments. The final tally, however, is not based on a simple total of commitments within the 10 possible CE and EE options. Rather, it results from a weighted combination of two complementary approaches to enabling citizen action. In other words, a project's thickness is based on counting the number of tools for citizen action (from zero to seven) that a project describes and then determining if and how they have matched with efforts that create an enabling environment for CE. ARC's CE Density Scale therefore reports on how mechanisms for social inclusion, external monitoring and public disclosure can potentially reinforce the officially recognized modalities for creating enabling environments for CE and accountability.

Although the number of CE commitments is the first step in determining the thickness of a project's approach, the final determining factor is what the project contributes to the enabling environment. For example, Table 1 shows that a project that includes commitments in all seven World Bank–prioritized CE areas could fall in one of two categories: Robust or Comprehensive. Seven commitments guarantee a rank in one of the top two categories. However, these seven CE commitments, if not matched with at least two of the EE indicators, are not sufficient for a project to qualify as Robust. To be considered Robust, the project must also include commitments to at least two of the EE indicators.

1.3.3 Qualitative analysis: the quality of commitments, based on depth and detail

To answer the question of *how* the World Bank is operationalizing its commitments to CE in ways that could foster accountability and empowerment, this assessment then investigates the content of the commitments. First, the assessment considers the detail and depth with which CE mechanisms and processes are explained, in terms of how they will both operate and incorporate stakeholders so that their inputs shape project decisions and implementation. Examples of questions that guide the process of determining the depth and detail of CE mechanisms include the following:

1. **Collaborative decision-making:** For projects that commit to collaborative decision-making, do projects specify the mechanisms and/or activities through which this would be carried out during implementation?

2. **Collecting feedback:** For projects that commit to collecting citizen feedback, do descriptions of the planned mechanisms explain how feedback solicited and collected will be integrated to inform project implementation (closing the feedback loop)?

3. **GRM:**
    a. For projects that commit to establishing a GRM, who will manage it (i.e., the same unit charged with managing the project, which could be a subject of complaints)? Will it be under the authority of, or subject to oversight by, a third party organization to avoid conflicts of interest?
    b. What GRM data will be disclosed? Will disclosure involve numbers of complaints received and resolved? Will data that are released cover the nature of the grievances and their resolutions?

Second, the assessment considers the detail and depth with which the project commits to fostering an enabling environment for CE. The hypothesis guiding this approach is that the less precise a CE commitment is at the project design stage, the easier it becomes for project authorities to impose their interpretations. The risk therefore is that without sufficient specificity, CE plans can

be diluted into a "tick the box" exercise during implementation. For example, the assessment asks the following kinds of specific questions:

1. **Social inclusion:** For projects that commit to proactive inclusion, do they provide details on the approaches that will be used to include marginalized and/or socially excluded groups in CE activities? What groups are specifically identified and what are the mechanisms explained for reaching out to and incorporating them?

2. **Public disclosure:** For projects that commit to public disclosure, do they detail specific mechanisms for the disclosure? Does the project report the frequency of planned public dissemination activities or explain exactly what information will be shared?

3. **Funding for CE:** Has the project allocated funds to support CE commitments?

Utilizing this two-tiered approach to quantitative and qualitative analysis, ARC then determines the degree to which a World Bank project's commitments to engaging citizens throughout its life cycle add up to a strategic approach which, if implemented, could tangibly contribute to empowerment and accountability.

II. Nigeria: Pilot Application of the Assessment Tool

2.1 Portfolio overview and analysis

To pilot this assessment tool and approach, ARC reviewed the World Bank's FY15–17 investment project portfolio[6] in Nigeria, with 16 projects ranging from US$50 million to over US$600 million. All 16 projects have an 'active' status at the time of writing this report. Table 2 shows the Nigeria FY15–17 portfolio, presenting basic operational information (i.e., year of approval, financing amount, application of social safeguards) alongside the numerical ARC assessment findings on CE. The table is organized in descending order from those projects with the greatest number of CE commitments to those with the fewest. Eight, or half, of the 16 projects have a classification of "Additional Financing" (AF), which means that the project provides a new infusion of financing for a project that had been approved earlier, either to extend implementation or to begin a new phase.

The following section provides an overall picture of the World Bank's approach to CE in the FY15–17 Nigeria portfolio, showing where commitments are concentrated and/or neglected. The discussion responds to the first part of the guiding research question presented above—i.e., how does the portfolio commit to operationalizing CE at different critical moments throughout the project lifecycle? The subsequent sections cover the project level analysis that explores the content of the range of commitments as documented. This section goes beyond the existence of a documented commitment that appears to meet the criteria of the different CE areas and assesses the commitments in terms of their potential to tangibly contribute to creating enabling environments for citizen action and bolster capacity and incentives for state response to citizen voice.

Table 2. CE overview by project, Nigeria FY15–17 (in descending order of CE commitments)

Nigeria Projects (FY15–17)	Commitment amount US$ (Million)	Social Safeguards	World Bank CE Strategy Priority Areas						Indicators of Enabling Environment for CE			Total World Bank CE commitments	Total Enabling Environment indicators
			Community Consultations reported	Collaborative decision-making	Citizen feedback collection	Citizen monitoring	GRM	CE capacity building	Results Framework Indicator(s) for CE	Proactive social inclusion	Third party monitoring	Proactive information disclosure		
Kaduna State Economic Transformation Program-for-Results FY17	350	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria FY17	200	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	7	3
State Education Program Investment (AF) FY16	100	No	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	7	2
Third National Fadama Development Project (AF 2) FY16	50	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	7	2
Mineral Sector Support for Economic Diversification FY17	150	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	No	7	2
National Social Safety Nets (AF) FY16	500	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	6	3
Community and Social Development (AF 2) FY16	75	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	6	3
Partnership for Education FY15	100	No	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	6	3
Youth Employment and Social Support (AF) FY16	100	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	6	3
Agro-Processing, Productivity Enhancement Livelihood Improvement Support FY17	200	Yes	Yes	Yes	Yes	No	Yes	Yes	Yes	Yes	Yes	No	6	2

Table 2. CE overview by project, Pakistan FY15–17 (in descending order of CE commitments)

Nigeria Projects (FY15–17)	Commitment amount US$ (Million)	Social Safeguards	World Bank CE Strategy Priority Areas							Indicators of Enabling Environment for CE			Total World Bank CE commitments	Total Enabling Environment indicators
			Community Consultations reported	Collaborative decision-making	Citizen feedback collection	Citizen monitoring	GRM	CE capacity building	Results Framework Indicator(s) for CE	Proactive social inclusion	Third party monitoring	Proactive information disclosure		
Better Education Service Delivery for All FY17	611	No	Yes	No	Yes	Yes	Yes	No	Yes	Yes	Yes	No	5	2
State Health Investment Project (AF) FY16	125	No	No	Yes	Yes	Yes	Yes	No	Yes	No	Yes	No	5	1
Development Finance FY15	500	No	Yes	Yes	Yes	No	Yes	No	No	Yes	Yes	No	4	2
Program to Support Saving One Million Lives FY15 (P4R)	500	No	No	No	Yes	No	Yes	Yes	No	No	Yes	Yes	3	2
Polio Eradication Support (AF) FY16	125	No	Yes	No	No	Yes	No	No	No	No	Yes	No	2	1
Polio Eradication Support (AF) FY15	200	No	Yes	No	No	No	No	No	No	Yes	Yes	No	1	2
TOTAL COMMITMENTS		6	14	12	14	12	14	7	12	12	16	8		

2.1.1 CE Density Scale

As described in the introduction, thick approaches to CE commitments combine a project's inclusion of the various CE activities laid out in the Bank's strategy with mechanisms or practices that potentially contribute to an enabling environment for CE. ARC's original CE Density Scale establishes parameters for understanding the variations of thickness and thinness in project CE commitments (see Table 2). The density is determined based on existence of commitments, not an interpretation of the quality or lack of quality of the commitment as documented. As already discussed, determining where a project ranks is based on a balance between planned CE mechanisms and contributions towards an enabling environment for CE, and not simply an absolute total of CE + EE commitments. For the CE Density Scale, classifications for the range of CE commitments, from highest to lowest, include Robust, Comprehensive, Intermediate, Weak, and Low.

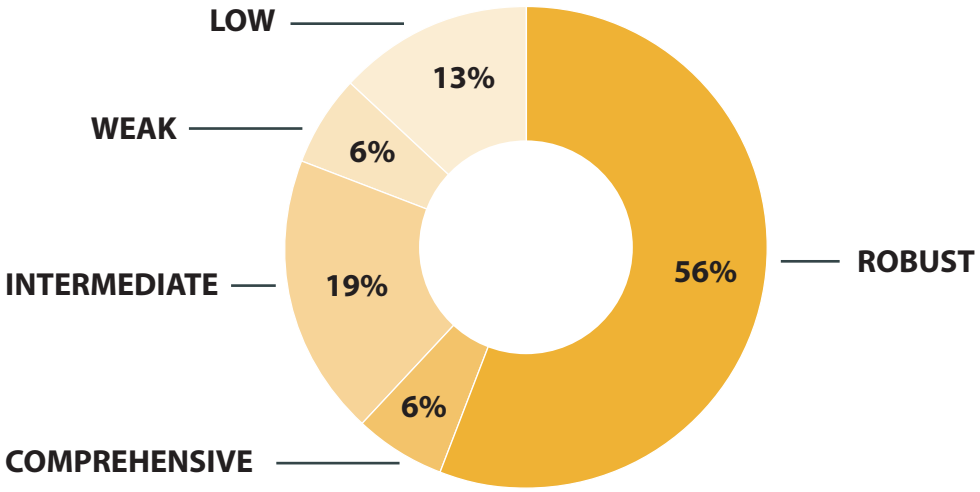
Table 3 depicts Nigeria's 16 FY15–17 projects in relation to ARC's CE Density Scale. The results show that the 16 projects are ranked as follows: **Robust (9), Comprehensive (1), Intermediate (3), Weak (1), and Low (2).**

Table 3. Nigeria FY15–17 CE Density scale (16 projects)

ROBUST 9 projects (56 percent)	COMPREHENSIVE 1 project (6 percent)	INTERMEDIATE 3 projects (19 percent)	WEAK 1 project (6 percent)	LOW 2 projects (13 percent)
7 CE + 3 EE Kaduna State Economic Transformation Program-for-Results FY17 Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria FY17 7 CE + 2 EE State Education Program Investment (AF) FY16 Third National Fadama Development Project (AF 2) FY16 Mineral Sector Support for Economic Diversification FY17 6 CE + 3 EE National Social Safety Nets AF (2016) Community and Social Development (AF 2) FY16 Partnership for Education FY15 Youth Employment and Social Support (AF) FY16	6 CE + 2 EE Agro-Processing, Productivity Enhancement Livelihood Improvement Support FY17	5 CE + 2EE Better Education Service Delivery for All FY17 5 CE + 1 EE State Health Investment Project (AF) FY16 4 CE + 2 EEDevelopment Finance FY15	3 CE + 2 EE Program to Support Saving One Million Lives FY15	3 CE + 1 EE AF Polio Eradication Support FY16 1 CE+ 2 EE Polio Eradication Support (AF) FY15

In the Nigeria FY15–17 portfolio, 62 percent (10 of 16) of projects commit to at least six CE areas and at least one mechanism for an enabling environment for CE. These projects therefore meet the criteria to be considered Robust (9) or Comprehensive (1) on the CE scale. Figure 1 depicts the projects by category across the CE Density Scale.

Figure 1. **CE Density Scale by percentage, Nigeria FY15–17**



Among the 56 percent of the Nigeria portfolio (nine projects) considered to be Robust in their CE commitments, two projects (*Kaduna State Economic Transformation Program-for-Results [FY17]* and *Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria [FY17]*) commit to all seven CE areas and all three mechanisms to facilitate an enabling environment. All nine projects commit to including third party monitoring. Of the three projects that commit to all CE areas but only two of the three mechanisms for an enabling environment the *Mineral Sector Support for Economic Diversification (FY17)* and *State Education Program Investment AF (FY16)* project have no proactive disclosure commitments. The *Second Additional Financing for the Third National Fadama Development Project (FY 16)* does not document any plans for proactive social inclusion. The four projects that commit to six CE areas and all three EE mechanisms (*National Social Safety Nets AF [FY16], Community and Social Development AF 2 [FY16], Partnership for Education [FY15], Youth Employment* and *Social Support AF [FY16]*), all leave out the same CE activity—capacity building.

At the Comprehensive level, there is only one project (*Agro-Processing, Productivity Enhancement Livelihood Improvement Support [FY17]*). Missing a commitment to citizen monitoring along with proactive information disclosure and therefore having six CE and two EE commitment, the project just misses inclusion at the Robust level. In the middle of the pack, ranked as Intermediate, are the three projects (*Better Education Service Delivery for All [FY17] State Health Investment Project AF [FY16] Development Finance [FY15]*). Nineteen percent of the Nigeria portfolio (three projects) occupy the Weak or Low categories. Only the *Program to Support Saving One Million Lives (FY15)* is categorized as Weak, and therefore above the lowest classification, because it includes three CE and two EE commitments. The two projects classified as Low—*Polio Eradication Support AF (FY15)* and *AF Polio Eradication Support (FY16)*—have two or fewer CE commitments. These three Weak

and Low classified projects, along with the *Development Finance Project (FY15)* which is classified on the CE Density Scale as Intermediate, do not commit to monitoring or reporting on CE activity progress and results (one of the minimal institution-wide requirements for CE). All four of these projects therefore have exempted themselves from accountability related to tracking or disclosing even minimal information about their CE efforts.

The quantitative results show that CE commitment density improves overtime in the Nigeria portfolio. The CE Density Scale shows that Nigeria improved application of the CE Strategy over the three years investigated. Three of the four projects with the lowest rankings on the CE Density Scale were approved in FY15. The one exception, *AF Polio Eradication Support (FY16)*, was additional financing for a project approved before President Kim's commitment and the CE Strategy. In contrast, both of the projects with 10 CE + EE commitments received World Bank Board approval in FY17. The CE Strategy was intended to apply beginning in FY15, but institution-wide strategies can take time to fully implement and the upward trend here can be seen as evidence of that.

On balance, the CE Density scale results provide a more positive than negative picture, although all the projects that fall into the bottommost categories show that there remains room for improvement.

2.1.2 Results by CE area

Figures 2 and 3 below showcase each of the CE and EE areas, showing how many of the projects in the Nigeria portfolio include each mechanism or activity, from greatest to fewest. Figure 2 focuses on the seven CE areas prioritized in the World Bank's CE Strategy while Figure 3 highlights the ARC-identified indicators of an enabling environment for CE. The portfolio level analysis only reports on the *existence* of commitments and not the *quality or lack of quality* of those commitments. The analysis of content will follow in the next section. However, it is important to start with the aggregate level to see the range of commitment incorporation before investigating the depth of these commitments.

Figure 2. **Project-level CE Commitments, Nigeria FY15–17**

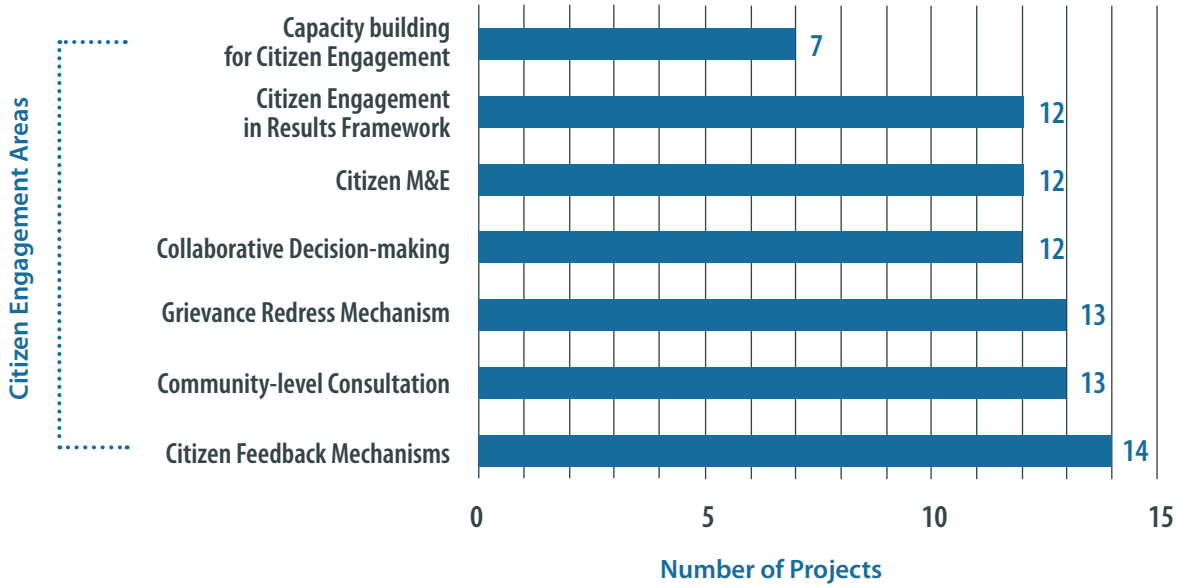
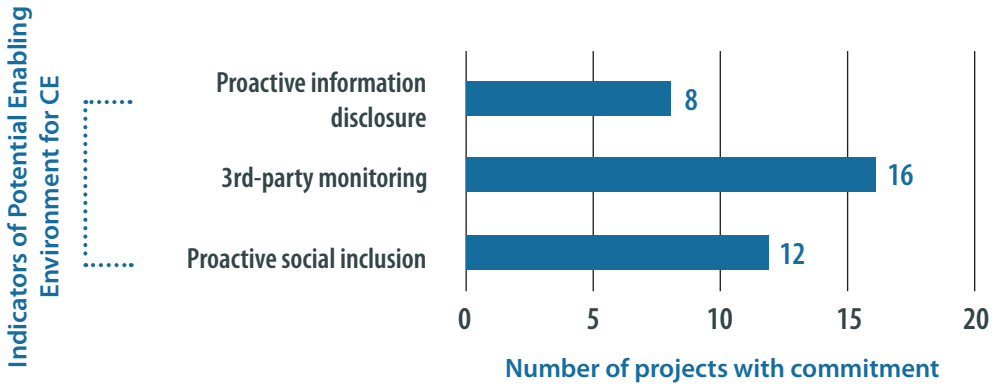


Figure 2 shows that while most projects report a range of CE commitments, there is no single CE category to which all 16 projects commit. The CE categories with the highest level of documented commitments include: community-level consultation during project preparation and CE feedback mechanisms during and after project implementation (14 projects each). Directly behind are commitments to GRMs (13 projects) and collaboration in decision-making, citizen involvement in M&E, and the inclusion of at least one indicator in the project results framework that reports on an aspect of citizen engagement (12 projects each). Capacity building for citizen engagement (for stakeholders including beneficiaries, government officials, etc.) is the only CE category to which fewer than half the projects (seven) document commitments.

As discussed in the introduction, the World Bank's institutional mandate for CE in Investment Projects requires that projects include at least one indicator that reports on some aspect of CE in its internal reporting system, called the Results Framework. How the Bank defines the Results Framework, its purpose and the mandates for public disclosure related to indicator results will be elaborated upon in the project level analysis below. However, as Figure 2 shows, 12 of the 16 Nigeria projects integrate at least one indicator dedicated to measuring CE. This means that four Nigeria projects do not meet the second requirement of the Bank-wide CE mandate. For the 12 projects that include an indicator intended to track and report publicly on CE-related activities, the full range of CE activities and goals measured in the different projects will be discussed in the next section.

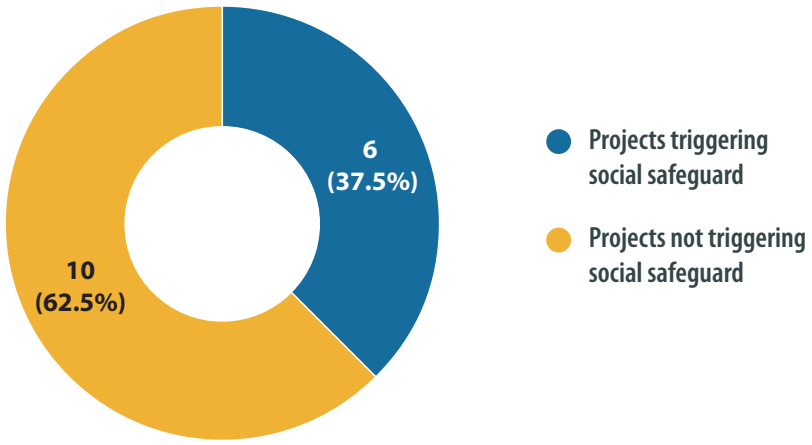
Figure 3. Indicators of an enabling environment for CE, Nigeria FY15–17



As Figure 3 above demonstrates, Nigeria projects show high percentages of commitments to the areas (proactive social inclusion, third party monitoring and proactive disclosure) that potentially create an enabling environment for CE. Twelve of the 16 Nigeria projects (75 percent) document commitments for social inclusion measures, intended to increase the representation of members from vulnerable communities into CE processes. All of Nigeria's 16 projects (100 percent) document plans to incorporate external verification for some portion of activities and results during their lifecycles. The World Bank CE Strategy asserts that third party monitors increase the likelihood that monitoring results are impartial and accurate because citizens may feel more secure to report their feedback and there are no conflicting interests. Although lower than the other two areas, the portfolio level results show that 8 of the 16 Nigeria projects (50 percent) document commitments to voluntarily disclosing some information related to project progress and outcomes, including CE in some cases, beyond minimal Bank requirements of disclosure of information.

It is important to note that 6 of the 16 Nigeria (FY15–17) projects apply the Bank's social safeguard policy for Involuntary Resettlement (see Figure 4).[7] As explained in Section 2.2, projects that trigger social safeguard policies relating to involuntary resettlement (Operational Policy/Bank Procedure 4.12) because of known or potential resettlement risks are required to include consultations with beneficiaries during project design, and implement a GRM during project implementation. Furthermore, social safeguard policy requires that the community-based consultation proceedings be documented and disclosed via publications in both English and any official national languages which are then shared in live presentations to audiences of invited stakeholders. The published documentation of these safeguard-required consultations was included in the project documents reviewed for this analysis.

Figure 4. Project-level application of Social Safeguards (Involuntary Resettlement) applied to Nigeria, FY15–17



The assessment results show that in the Nigeria portfolio, projects' application of social safeguards is correlated with higher density of CE commitments. Still, among the top 10, all 4 projects that did not trigger any social safeguards fully committed to the three mechanisms that facilitate an enabling environment for CE, while several projects with social safeguards did not meet all three benchmarks. Therefore, safeguards would appear to be one influencing factor that increases projects' commitments to CE activities throughout the project lifecycle.

The World Bank's social safeguard mandates pre-existed the CE Strategy and President Kim's increased attention to these issues. In principle they are seen as strengthening incentives for implementing certain CE activities in projects applying social safeguards. However, as noted in the World Bank's 2018 IEG assessment of CE, the application of social safeguards does not in practice mean that these "required" CE activities are carried out well or in full or reported on as expected (World Bank 2018c:21). Therefore, it remains critical to investigate what the CE commitments actually include, even while recognizing the additional mandate that the application of social safeguards is assumed to add.

2.2 Analysis of CE commitment trends across projects

The previous section provides an overall picture of how the FY15–17 Nigeria portfolio has integrated the different components of the Bank's CE Strategy into project design. In this section, the discussion moves beyond the identification of the range of CE commitments and analyzes their content, based on published plans versus evidence from implementation. The discussion will proceed according to the CE priority areas identified in the World Bank strategy (i.e., consultation in project design, citizen monitoring, GRM, etc.). The next section will focus on the three ARC-identified indicators of a potential enabling environment for CE (i.e., proactive social inclusion, third party monitoring, and proactive information disclosure). Where relevant, the discussion draws on the particular Nigeria projects that have committed to undertaking activities in those respective areas.

2.2.1 Consultations

In the context of World Bank projects, "consultation" refers to engagement with citizens in the design/project preparation stage *before* an operation has been approved by the World Bank Board. Distinct from dialogue, the World Bank defines consultation as "a more structured exchange in which the convener commits to 'active listening' and to carefully consider the comments, ideas, and recommendations received" (Manroth et al 2014:42). The objectives for citizen consultation therefore include receiving input for improved decision-making in project design and implementation arrangements, which therefore should contribute to improved results and sustainability. Since citizen consultations are required for projects that apply social safeguards, this CE activity has historically been the most frequently incorporated into Bank operations.

In principle, citizen consultations undertaken during project preparation would inform the project design and implementation planning that is submitted to the World Bank Executive Board for approval. Therefore, unlike the CE data that are the basis for the rest of this report, information on consultations held with citizens comes from what Bank teams report they *have* done versus commitments to what they say they *will* do.

In the Nigeria portfolio, 88 percent of the FY15–17 projects (14 of 16) reported holding community-based consultations during project preparation. It is important to note that 6 of these 14 projects had applied the involuntary resettlement social safeguard, which made community consultations with stakeholders/beneficiaries mandatory in accordance with World Bank policies. For the other eight projects this was an option exercised by the respective project team.

2.2.2 Collaboration in decision-making commitments

Collaboration in decision-making is intended to go beyond consultations that seek input and integrate citizens directly into decision-making. The CE Strategy explains that this process seeks to "make decisions more responsive to citizens' needs and improve the sustainability of program and project outcomes through increased ownership by citizens" (Manroth et al 2014:43-44). It is important to note that the language of "collaboration" and "collaborative decision-making" as conveyed in the CE Strategy is not vocabulary that project teams use in public documents to describe specific CE efforts. Projects typically continue to employ the term "consultation" in guiding documents for participatory decision-making exercises that occur throughout implementation and not only during preparation, which is the definition of consultation used in the CE Strategy and therefore employed in this analysis.

This assessment determined that a project had committed to "collaboration in decision-making" if it described intentions and/or mechanisms that went beyond solicitation of feedback and would directly enable citizens and/or citizen organizations to be involved in decision-making processes for the project. Table 4 captures the projects in the Nigeria portfolio that include such commitments and explain what those commitments involve.

TABLE 4. **Collaborative decision-making commitments, Nigeria Portfolio FY15–17 (12 of 16 projects)**

Project title	Collaborative decision-making commitments
Third National Fadama Development Project (AF 2) FY16	Fadama community associations will identify, prepare, give final approval, execute, supervise, operate, maintain subprojects; support to include local development plans in local government planning programs.
Mineral Sector Support for Economic Diversification FY17	Dedicated component, "Building independent oversight capacity and stakeholder consultation mechanisms." Includes forming platform/working group to contribute to decisions on benefit sharing, consent, land access for export and production activities, among other issues.
Agro-Processing, Productivity Enhancement Livelihood Improvement Support FY17	Creation of a "forum for citizen engagement," includes opportunities to inform overall project decisions. At local to federal levels formation of steering committees and technical committees responsible for project decisions (i.e., sub-project choices (content) and sub-project implementation decisions (including hiring, etc.)).
Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria FY17	"Foundational principle" of citizen involvement in investment decisions done via financing of community-based approaches, with focus on engaging conflict-affected citizens (i.e., forcibly displaced).
Community and Social Development (AF 2) FY16	CDD structure, broad-based community participation (via school-based management committees, community-based health organizations, farming groups/farming cooperatives) in plans formulation, micro-project identification and preparation.
State Education Program Investment (AF) FY16	School-based Management Committees (SBMC) institutionalized across Nigeria since 2012 and participatory School Improvement Plans (SIPs).
Partnership for Education FY15	SBMCs
State Health Investment Project (AF) FY16	Ward development committees involved in implementation decisions; community leaders as part of facility management committees which oversee use of funds.
Development Finance FY15	Government-initiated stakeholder consultation group.
National Social Safety Nets (AF) FY16	Citizen's charter.
Kaduna State Economic Transformation Program-for-Results FY17	Framework for Responsible and Inclusive Land-Intensive Agricultural Investments (FRILIA) for Kaduna State. Establishment of a multi-stakeholder Steering Committee to oversee its development implementation.
Youth Employment and Social Support (AF) FY16	Community-based beneficiary identification, implementation, and monitoring.

This analysis found that in Nigeria 12 of the projects committed to collaborative decision-making during project implementation. All of the projects that commit to collaborative decision-making say they will do so via led committees, alternatively using the term "forum" in some cases. Several of the projects commit to working with already established village-level committees instead of creating new ones without social and cultural purpose. However, the projects also proactively acknowledge that pre-existing community bodies can be exclusionary towards marginalized groups and so they commit to supporting expanded participation. Where community-based groups are not present or have become defunct, these projects plan to support the development of citizen-based advisory groups for decision-making. This analysis found that for the majority of the 12 projects, the collaboration commitments, if carried out as presented, would go beyond passive consultation and would meet the standards for collaboration.

2.2.3 Citizen feedback opportunities throughout the project lifecycle

The CE Strategy recommends that project teams solicit feedback from citizens on a vast range of issues important to project success, including "effectiveness, inclusiveness, quality, delivery time, transaction costs, and targeting, as well as on resource utilization or engagement processes" (Manroth et al 2014:44). The CE Strategy shares examples of standard tools used for feedback collection, such as "satisfaction surveys, focus group discussions, hotlines, community scorecards, citizen report cards, or SMS/online feedback" (Manroth et al 2014:44).

Table 5 captures the projects in the Nigeria portfolio that include such commitments to collecting citizen feedback during project implementation and explain what the commitments involve.

TABLE 5. Citizen feedback commitments, Nigeria FY15–17 (14 of 16 projects)

Project title	Citizen feedback commitments
Better Education Service Delivery for All FY17	• "Factor in" feedback from stakeholders, particularly in regard to social and environmental issues. • Establish a virtual communications platform, using software such as WhatsApp.
Kaduna State Economic Transformation Program-for-Results FY17	• Develop the following citizen feedback mechanisms: - Social audits, M&E system "Eyes and Ears," and a device that allows citizens to provide feedback via social media, radio stations, and phones.
Mineral Sector Support for Economic Diversification Project FY17	• On-going stakeholder and public consultation, through the following: - Meetings, radio programs, requests for written comments, questionnaires, interviews, and focus groups.
Agro-Processing Productivity Enhancement and Improvement Support Project FY17	• Measure the level of satisfaction and support for the project, through: - Consultations with village or community leadership. - Focus group discussions, questionnaires at worship centers and town hall meetings.
Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria FY17	• Set up feedback mechanisms that will gather information on how communities benefit from investments. Possible mechanisms include: conflict-sensitive indicators, community-based mapping, and cell phone-based mechanisms.

Continued

Project title	Citizen feedback commitments
National Social Safety Nets Project FY16	• Develop community feedback mechanisms. Possible mechanisms include: - Community scorecards - Citizen report cards - Citizen's Charters - Social audits - Focus group discussions - Cell phone-based applications.
AF State Education Investment Project FY16	• Quantitative beneficiary assessments by independent consultants.
Community and Social Development AF2 FY16	• Social audits via public meetings held by local CSOs.
Nigeria Youth Employment and Social Support (AF) FY16	• Qualitative learning surveys conducted by an independent agency.
AF Nigeria State Health Investment Project FY16	• Random patient home visits, measuring satisfaction. • SMS feedback mechanisms piloted in certain areas.
Nigeria Partnership for Education Project FY15	• Student assessments, CSO monitoring.
Development Finance Project FY15	• Provide an email address, phone number, or website address, by which community members can submit feedback.
Second AF to Third National Fadama Development Project FY 16	• Hold beneficiary workshops annually for the implementation performance evaluations, mid-term reviews and end-of-project evaluations. • Conduct surveys at mid-term and project closing to measure beneficiary satisfaction.
Program to Support Saving One Million Lives FY15	• Monitor federal hospitals' compliance with ServiCom service standards, including by capturing patients' feedback.

In Nigeria, 14 of the 16 active projects demonstrate clear commitments to incorporate mechanisms for capturing citizen feedback during and following implementation. Information about what mechanisms would be utilized and how frequently is mostly provided only in general terms. The projects lay out a number of options, all of which are suggested in the CE Strategy as examples of what their initiatives could use for citizen feedback gathering. These range from public forums, where attending citizens could engage in discussion but there would not be anonymity, to direct individual feedback provision (including satisfaction surveys and community score cards) which has the possibility of anonymity. Based on when the monitors implement the tools, most of these options would provide for the chance to periodically integrate the collected feedback into implementation. Seven out of these 14 projects suggested using ICT platforms such as email, radio, phone and social media as feedback channels.

2.2.4 Commitments to involving citizens as monitors

According to the CE Strategy, involving citizens in project monitoring "can increase transparency, improve efficiency of service delivery or budget execution, and reduce opportunities for corruption (Manroth et al 2014:47). As discussed in the introduction, the Bank calls this category of citizen engagement "citizen-led monitoring," even though the definition only calls for citizen participation and not leadership. For example, such approaches could limit citizens' roles to atomized data-gathering, without involvement in agenda-setting. Therefore, ARC refers to this simply as citizen monitoring, given the lack of evidence that the citizens involved would actually have the opportunity to lead and make decisions about these processes.

Nevertheless, participation in project monitoring activities give citizens opportunities to go beyond serving as feedback providers and take part in gathering this feedback, as well as other project related data on progress, results, and outcomes. This allows beneficiaries access to the big picture of project performance and service provision. Table 6 captures the projects in the Nigeria portfolio that include such commitments and explain what the commitments involve.

TABLE 6. Citizen monitoring commitments, Nigeria FY15–17 (12 of 16 projects)

Project title	Citizen monitoring commitments
Better Education Service Delivery for All FY17	• Provide ways for citizens to validate M&E findings, including: - Community conversations with SBMCs - CSO monitoring of social and environmental safeguards in conflict areas.
Kaduna State Economic Transformation Program-for-Results FY17	• Develop the "Eyes and Ears" project, allowing community members to view the progress of government projects on their phone.
Mineral Sector Support for Economic Diversification Project FY17	• Create oversight structures that include civil society. • Develop accountability mechanisms involving CSOs, academia, the legislature, and the media.
Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria FY17	• Social accountability in oversight and results monitoring. • Budget monitoring and transparent contract awards. • CSO project supervision and M&E.
National Social Safety Nets Project FY16	• Develop community feedback mechanisms with the addition of CSO and third party monitoring of results.
AF State Education Investment Project FY16	• SBMC to lead monitoring.
Community and Social Development (AF2) FY16	• Allow local CSOs and NGOs to lead social audits with support from state.
Nigeria Youth Employment and Social Support (AF) FY16	• CSOs and CBOs "will be actively engaged in monitoring and providing feedback on the implementation of the operation."
AF Nigeria State Health Investment Project FY16	• Involvement of health facility committees and ward development committees in M&E.
AF Polio Eradication Support Project FY16	• NGO and CSO supervision, monitoring, and evaluation for environmental safeguards.

Continued

Project title	Citizen monitoring commitments
Second AF to Third National Fadama Development Project FY16	• Community-based, participatory monitoring by community members and university students. • Monitoring systems consist of self-monitoring at the community level; input-output monitoring will be done by participatory user groups and community associations.
Nigeria Partnership for Education Project FY15	• Foster CSO and local monitoring in project performance, implementation, service delivery, accountability, and evaluation. On average: seven CSOs active per state per year. • Improve sector supervision and monitoring at state and local government levels.

Twelve projects commit to going beyond providing opportunities for citizens to give feedback by involving citizens in oversight roles; monitoring service delivery, revenues, budget execution, procurement, contract awards, reform policies, and so on. These projects generally commit those citizen committees involved in collaborative decision-making, to continue project involvement in a monitoring role. Beyond these descriptive commitments it is not specified how citizens would operate or manage social accountability mechanisms, versus acting as participants. For a project that has not included mechanisms for citizen feedback, the inclusion of citizen monitors offers a unique opportunity for the project to make space for some citizen engagement.

2.2.5 GRM commitments

As with beneficiary consultation during project design, the World Bank requires all projects that have triggered social safeguards for involuntary resettlement or for indigenous peoples to incorporate a project-specific GRM (see Operational Policy/Bank Procedure 4.12). According to Bank policy, this must be accessible, free, easily understood, transparent, responsive and effective, must not restrict access to official grievance channels (such as the courts, including traditional courts), and must not cause fear of negative consequences for its recourse among users. Therefore, while all projects in a country portfolio are encouraged to include project-specific GRMs so that beneficiaries can share grievances and seek redress for unwanted project experiences, projects that involve either of these social safeguards, in principle, are required to include this specific CE mechanism. This policy nuance is important to understand the GRM results in the Nigeria portfolio, shown in Table 7, because six of the fourteen projects that commit to including a project-level GRM also triggered the involuntary resettlement safeguard.

The standard format for a GRM is that citizen complaints are filed at the community level and, if necessary, they will have opportunities to escalate their grievances to higher level authorities, with the final level being the institution of the World Bank. Program documents lay out general details related to the structure and time frame and some guidelines (for example, all seven projects will accept complaints orally as well as written complaints). More specific details relating to how communities can learn about a project's GRM and tangible instructions for submitting grievances and following up, for example, is often provided in a project's OM.

TABLE 7. GRM Commitments, Nigeria FY15–17

Project title	Commitment to create GRM	Does the GRM include a commitment to publicly report on number/percentage of grievances reported/resolved? If so, via what commitment?
Better Education Service Delivery for All FY17	Yes	No
Kaduna State Economic Transformation Program-for-Results FY17	Yes	No
Mineral Sector Support for Economic Diversification Project FY17	Yes	No
Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria FY17	Yes	Yes, voluntary disclosure
Agro-Processing Productivity Enhancement and Improvement Support Project FY17	Yes	Yes, results framework indicator requirements
National Social Safety Nets Project FY16	Yes	No
AF State Education Investment Project FY16	Yes	No
Community and Social Development (AF2) FY16	Yes	Yes, results framework indicator requirements
Nigeria Youth Employment and Social Support (AF) FY16	Yes	Yes, results framework indicator requirements
AF Nigeria State Health Investment Project FY16	Yes	No
Second AF to Third National Fadama Development Project FY 16	Yes	No
Development Finance Project FY15	Yes	No
Nigeria Partnership for Education Project FY15	Yes	No
Program to Support Saving One Million Lives FY15 (P4R)	Yes	No

Of the six projects that trigger the involuntary resettlement social safeguard, all commit to making the complaints mechanism available to project affected peoples beyond the limited populations that would be mandated by the resettlement safeguard. The FY15 Development Finance project details in program documents how its GRM commitment would apply to employees, those involuntarily resettled, as well as the public at large.

Among the 14 projects that commit to incorporating a GRM, 4 commit to publicly report on at least a single aspect of the GRM. Two fulfill this commitment through GRM-related results framework indicators. The details of how these GRM indicators are framed and the nature of their goals will be discussed in the CE indicator section below. The Multi-Sectoral Crisis Recovery Project for NE Nigeria (FY17) is the single project to commit to proactive disclosure of GRM results. It commits to publicly share a biannual publication that reports on all complaints received via the GRM and the

actions taken to resolve these complaints. This 100 percent commitment and the level of detail this project pledges to reveal is unique across the portfolio.

2.2.6 Capacity building for CE commitments

World Bank projects often incorporate capacity-building activities related to project content and management, but activities dedicated to training on CE—for implementers or participants—are far less common. This CE Strategy therefore specifically emphasizes the importance of extending capacity-building investment to include CE-related capacity building, particularly for project teams, sectors, and in country settings with limited experience incorporating meaningful citizen engagement into development operations. It includes activities specifically designed for citizens, CSOs, communities, government officials, and national accountability institutions to strengthen their engagement and participation in project implementation (service delivery, natural resource management, public financial management, and/or CDD projects).

TABLE 8. Capacity Building for CE in Nigeria FY15–17 (7 of 16 projects)

Project title	Commitments to capacity building for CE
Kaduna State Economic Transformation Program-for-Results FY17	• Build institutional capacity for preparation and execution and citizen engagement.
Mineral Sector Support for Economic Diversification Project FY17	• Capacity building of CSOs, CBOs and other relevant stakeholders to participate in key decisions in mining operations within communities, including the development and negotiation of Community Development Agreements, mining revenue transparency, sector accountability and governance, environmental management, etc.
Agro-Processing Productivity Enhancement and Improvement Support Project FY17	• The communication strategy commitments include carrying out "activities that promote effective, informed and transparent dialogue among all stakeholders within and around project locations." Also organizing local workshops and consultation meetings to prepare beneficiaries to submit sub-project proposals.
Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria FY17	• Build government capacity for CE (to strengthen how they carry out their responsibilities and to restore relationships between citizens and government).
AF State Education Investment Project FY16	• Train School Based Management Committees and build their capacity to report on fraud and corruption at school level and on unequal power dynamics between families and teachers.
Second AF to Third National Fadama Development Project FY16	• Train facilitators to ensure participatory implementation of activities. • Improve the capacity of user groups, community associations and Local Government Areas to be able to evaluate project impact. • Train beneficiaries and stakeholders to create awareness and strengthen capacity and train project staff in CSOs so that they can assist Fadama users to develop their own local development plans which are the basis for all project-funded activities.
Program to Support Saving One Million Lives FY15	• Mitigation measures which include strengthening monitoring capacity of civil society.

Seven projects have proactively committed to capacity building for CE in project documents. The capacity building is linked in most cases with the citizen committees that are intended to be involved in project decisions throughout. Therefore, capacity building for these participants relates to strengthening their soft skills of engagement as well as "hard skills" related to executing any necessary technical responsibilities. The capacity building discussions also include commitments to training government counterparts on how to engage with citizens, not only putting the pressure on the beneficiaries to learn about engagement with partners that may not be amenable.

2.2.7 CE indicator commitments

Results Framework is an overarching term employed by the World Bank to describe the context in which results are internally measured and monitored. In practice, the results framework does not necessarily address all aspects of a project. Rather it incorporates a small number of indicators that together explain how the project development objective (PDO) is to be achieved. This is significant because indicators encompassed within a project's results framework must (1) explain how the data collected will be used over the course of project implementation and (2) must be publicly disclosed. Therefore, if the results framework includes an indicator on CE, the project must disclose information publicly at least about this particular area.[8]

As discussed in the introduction, A CE Results Framework indicator must meet at least one of the following criteria:

- Clearly capture citizen feedback and in so doing report "whether there is a tangible response to close the feedback loop"; or
- Monitor the extent to which citizens are involved in decision-making related to project design, implementation and oversight (World Bank 2018a).

The discussion below will therefore consider these criteria when analyzing projects' CE indicators. Table 9 matches the projects with their respective CE indicator(s).

TABLE 9. CE indicator commitments, Nigeria FY15–17 (12 of 16 projects)

Project title	CE area	Indicator
Better Education Service Delivery for All FY17	Citizen feedback	• Disbursement Linked Indicator (DLI) 4 (states implementing and publishing the ASC, including verification by SBMCs) will rely on an agreed uniform template for the ASC that is to be completed across states, combined with verification by the NBS as the IVA that will conduct spot checks at a sample of schools. • DLI 5 (states planning and reporting on Universal basic education progress, including using public basic education spending data) will rely on an agreed template with verification undertaken by an IVA from local academic or think-tank institutions.
Kaduna State Economic Transformation Program-for-Results FY17	Citizen feedback	• Increased fiscal accountability (measured by improved government responsiveness to citizens' feedback on fiscal performance, in terms of percentage of capital projects improved in response to citizens' feedback, captured in the Eyes and Ears project monitoring system).

Continued

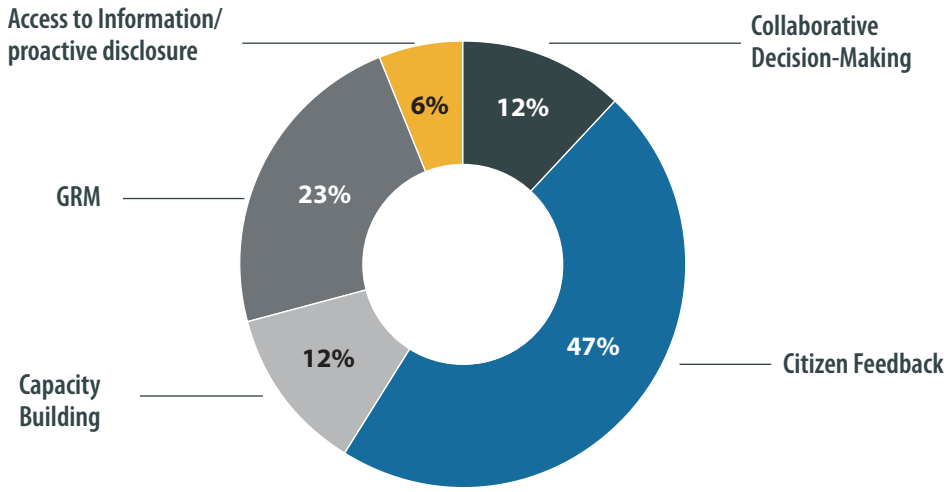
Project title	CE area	Indicator
Mineral Sector Support for Economic Diversification Project FY17	Capacity building, Citizen feedback	• Citizen participation and accountability mechanism established for CSO/CBO/Non-state actor participation in the mineral value chain. • Non-state actors' capacities built to play an active role in sector monitoring across the value chain, particularly in production and revenue transparency and community participation.
Agro-Processing Productivity Enhancement and Improvement Support Project FY17	Citizen feedback, GRM	• Percentage of beneficiaries satisfied with delivery (timely and quality) of project benefits. • Goal of 75 percent, 80 percent final result; Percentage of grievances registered, related to the delivery of project benefits that are actually addressed. • Goal of reaching 100 percent but measurement will be done every two years.
Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria FY17	Citizen feedback, female percentage specified	• Percentage of beneficiaries satisfied with project activities towards increased social cohesion; percentage of female beneficiaries satisfied with project activities towards increased social cohesion. Done so twice, mid-term and end of project. This indicator measures the achievements of various project activities towards increased social cohesion, including increased trust amongst communities and between different population groups. Such activities include, but are not limited to, financing social cohesion initiatives, setup of peace groups, provision of community-based psychosocial support, and the strengthening of existing community mobilization and engagement mechanisms. • Goal of 42-60 percent.
AF State Education Investment Project FY16	Collaborative consultation	• Commitment to community collaboration, but not spelled out. • Revision to Results Framework states that Schools will receive grants against approved SIPs submitted by SBMCs.
National Social Safety Nets Project FY16	Citizen feedback, GRM, Access to Information	• Percentage of complaints satisfactorily addressed within three months of initial complaint being recorded. • Percentage of beneficiaries and non-beneficiaries that report they are aware of project objectives and entitlements. • Percentage of beneficiaries that report they are satisfied with the targeted cash transfers (based on an annual Results and Resources Scorecard to be implemented and made public by independent third party).
Community and Social Development (AF2) FY16	GRM, Citizen feedback	• Percentage of project beneficiaries satisfied with the project interventions. • Percentage of grievances addressed within the timeframe stipulated in the OM.
Nigeria Youth Employment and Social Support (AF) FY16	GRM	• Percentage of grievances addressed within the timeframe stipulated in the OM.
AF Nigeria State Health Investment Project FY16	Collaborative decision-making	• A new indicator on the proportion of health facilities in the project area which have functioning management committees with community representation on them.

Continued

Project title	CE area	Indicator
Second AF to Third National Fadama Development Project FY16	Citizen feedback	• 75 percent of Fadama and Non-Fadama users are satisfied with operations, maintenance, and utilization of community-owned infrastructure and capital assets acquired through the Project.
Nigeria Partnership for Education Project FY15	Capacity building	• Schools must have a SBMC which must receive training in accordance with state developed guidelines. (Not specified as an CE indicator but appears to measure an aspect of CE).

Table 9 shows that 12 of the 16 Nigeria projects developed at least one indicator to measure an aspect of CE. Six out of the 12 include more than one CE area in the project results framework. Three projects stand out: The *Agro-Processing Productivity Enhancement and Improvement Support Project (FY17), Community and Social Development (FY16)* and *National Social Safety Nets projects (FY16)*, because they each incorporate separate indicators to measure at least two distinct aspects of citizen engagement. The *National Social Safety Nets project* includes three indicators. The projects most commonly choose to measure the collection of citizen feedback (7 of 12 projects). Figure 5 below shows the division across the CE categories.

Figure 5. Classification of CE Indicator Categories, Nigeria FY15–17



2.3 Analysis of commitments to an enabling environment for CE

This research is based on ARC's hypothesis that a project's inclusion of CE activities is not sufficient on its own to guarantee meaningful CE and therefore an "enabling environment" is needed to facilitate and shape such engagement. Although individual projects do not have the power or influence to shape the general context in which they are implemented, they can take actions that potentially (favorably or unfavorably) contribute to an enabling environment for CE. Therefore, the overall opportunity for CE is not only determined by the existence of discrete mechanisms and activities for citizens to provide input, make decisions, and be involved in monitoring, for example, but also by the circumstances in which these activities are carried out.

Although not guaranteed, projects have the potential to influence these enabling circumstances in at least three ways: (1) by fostering social inclusion, (2) accountability by incorporating independent monitoring mechanisms, and (3) transparency through disclosure of project information. The discussion below covers the assessment findings in the 16 Nigeria projects across these three areas.

2.3.1 Proactive social inclusion commitments

Groups that have experienced social marginalization and exclusion could be omitted from participatory processes without proactive measures to ensure their engagement. These groups include women, children and youth, people with disabilities, the elderly, and migrants. Therefore, this section analyzes how projects commit to incorporating "proactive social inclusion measures" for vulnerable groups in planned CE processes. Table 10 details the proactive inclusion measures described across the Nigeria portfolio.

TABLE 10. Proactive social inclusion commitments in Nigeria (12 of 16 projects)

Project title	Population group	Proactive social inclusion commitments
Better Education Service Delivery for All FY17	Vulnerable groups (generally)	• Give attention to vulnerable groups in consultations and program benefits.
Kaduna State Economic Transformation Program-for-Results FY17	Women	• Mainstream gender equity and social inclusion in the governance processes. • Special attention given to proactive inclusion during the: - Implementation of the Systematic Property Registration Program. - Strengthening of investment promotion. - Development and implementation of the FRILIA.
Mineral Sector Support for Economic Diversification Project FY17	Women	• Activities that enhance "women and gender inclusiveness" throughout the duration of the project. No further specifics are mentioned.
Agro-Processing Productivity Enhancement and Improvement Support Project FY17	Women, Youth	• Consult with women. - Gauge the type of support that women and youth may need to develop business plans for the project to fund.

Continued

Project title	Population group	Proactive social inclusion commitments
Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria FY17	Women	• Indicator measuring citizen satisfaction will be gender disaggregated. • Consultations will be gender-sensitive and gender-responsive, including sex-disaggregated surveys, gender-respective focus groups.
National Social Safety Nets Project FY16	Women	• Proactive gender inclusion, with specifics including: - Gender Action Plan (GAP). - Year 1 Social Analysis. - Results Framework Indicator disaggregated by gender. - Gender Sensitive Entry Points for the communication strategy and GRM.
AF State Education Investment Project FY16	Women, Youth	• Make School-based Monitoring Committees accessible to women and youth. • Ensure adequate representation of women in monitoring attendance and training programs.
Community and Social Development (AF2) FY16	Women, youth, people with disabilities, widows, returnees, and Internally Displaced Peoples (IDPs)	• Group Project Management Committees that include women, youth, people with disabilities, widows, returnees, and IDPs. • Ensure that the poor and marginalized are as informed as community leadership, including through: - Community theatre and radio programs. - Alternate local stakeholders (such as women's groups). - Posting key information in public places. • Include vulnerable groups in consultations. • Include women in steering and advisory committees.
Nigeria Youth Employment and Social Support (AF) FY16	Youth, IDPs	• As a youth-dedicated project, there is a central commitment to youth inclusion • Include IDP youths. - No details on the mechanisms for including IDPs
Partnership for Education Project FY15	Vulnerable groups (Children's sub-committees, girls' clubs, and mother's clubs)	• Include vulnerable groups, including: - Children's sub-committees, girls' clubs, and mother's clubs. • Encourage the establishment of systems by which abuse in public schools can be addressed.
Development Finance Project FY15	Women	• Monitor and report on experience of women who receive loans as part of this program.
Nigeria Polio Eradication Support (AF) FY15	Vulnerable groups (women and children)	• Include poor and vulnerable groups (women and children) who are affected by the state of emergency, government at the federal level and the development partner community.

Twelve out of the 16 Nigeria projects assessed incorporate at least one commitment to proactively include different groups of vulnerable stakeholders in CE processes. "Gender", "women", "poor" and "vulnerable" are the terms which appeared with highest frequency in relation to proactive social inclusion. However, the definition of who is considered as vulnerable differs from project to project. Ten of the 12 projects with social inclusion commitments report the intention to guarantee equal representation for women or to being gender-responsive and sensitive throughout the project cycle. Common activities identified to proactively ensure women's participation include consultations (in some cases with women-only opportunities), training for CE and beneficiary satisfaction surveys that commit to disaggregating results by gender. Proactive measures to include youth in CE activities are reported in only three projects while only the Community Driven Development project in 2016 mentions that attention will be paid to include the disabled in CE efforts. Figure 6 illustrates the different population groups that projects across the Nigeria portfolio commit to proactively incorporating.

Figure 6. Proactive social inclusion commitments, Nigeria FY15–17 (by population group)

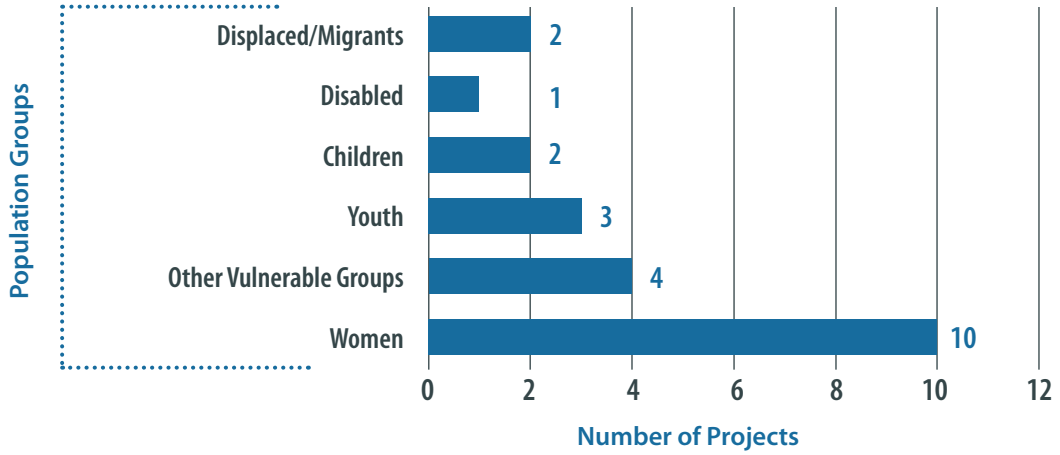


Figure 6 shows that across the Nigeria portfolio, projects overwhelmingly prioritize proactive social inclusion of women and far less frequently document commitments to include any other marginalized groups. Furthermore, not only is the number of commitments to gender inclusion compared to other marginalized groups higher, but these commitments show greater depth and specificity. Figure 6 also shows that the second most commonly addressed population sub-group in project documents is a composite category called "other vulnerable groups" (OVG). The definition of OVG varies according to projects and sometimes it is used independently as a stand-alone category. This analysis uses the OVG categorization to broadly encompass groups including the poor, elderly, socially or economically excluded, landless, AIDS patients and the chronically ill. Youth are addressed in three projects, followed by children in two projects and displaced/ migrants in two projects. Disabled people are only addressed in one project.

2.3.2 Commitments to third party monitoring

The World Bank defines third party monitoring as "monitoring by parties that are external to the project or program's direct beneficiary chain or management structure" (Van Wicklin and Gurkan 2013:2). It recommends that projects incorporate third party monitoring in order "to provide an independent perspective on project or government performance (Van Wicklin and Gurkan 2013:2). It is because of the anticipated independence of these external monitoring entities that the incorporation of third party monitoring can potentially contribute to an enabling environment for CE.

The ARC assessment tool identifies first whether a project commits to incorporating an external third party monitoring entity (professional or community-based). If so, the assessment then ascertains the purpose for which the entity has been recruited (i.e., monitoring safeguards' compliance, impact evaluation, the collection of citizen feedback, etc.) and whether there is a documented intention to share findings with the public. These three steps are collectively considered to determine the potential contribution of "third party" monitoring to an enabling environment.

The assessment revealed that projects commit to third party monitoring for a range of different project-related activities and mechanisms. While some projects include a single commitment to third party monitoring in just one area, many include multiple commitments to third party monitoring across several of these areas during the project life cycle. The assessment identified five broad categories for which World Bank-supported operations utilize third party monitoring. These include:

(i) **Social Safeguard compliance** for projects that have been determined to involve or have the potential to involve resettlement and/or Indigenous Peoples.

(ii) **Project monitoring and evaluation** of general project processes, results and outcomes to accompany the project monitoring taken by project management units (PMUs).

(iii) **Disbursement Linked Indicator (DLI) Monitoring**. DLIs are project indicators whose achievement triggers the release of a new tranche of funds to continue project implementation. These are utilized by projects to incentivize the achievement of key program milestones and improve performance. Because funding provision is linked directly with goal achievement, the Bank requires that these indicators be monitored by entities external to the World Bank. Therefore, projects that incorporate DLIs rather than traditional project indicators are required to contract third party monitoring.

(iv) **CE activity monitoring** involves the external monitoring of the CE project activities and mechanisms designed to provide affected peoples with opportunities to provide feedback, make decisions, submit complaints (i.e., management of a project-level GRM by an entity separate from the PMU or the client government).

(v) **Impact Evaluation** to determine whether the changes in outcomes can be attributed to the World Bank–supported project implemented.

An overview of project commitments across these five categories is highlighted in Table 11.

TABLE 11. Third party monitoring commitments, Nigeria FY15–17 (16 of 16 projects)

Project title	Safeguard compliance	Disbursement Linked Indicators	Project M&E (process and/or outcomes)	Citizen engagement	Impact evaluation	Proactive disclosure
Better Education Service Delivery for All FY17	■	■				
Kaduna State Economic Transformation Program-for-Results FY17		■	■			■
Mineral Sector Support for Economic Diversification Project FY17	■		■	■		
Agro-Processing, Productivity Enhancement and Livelihood Improvement Support Project FY17	■		■			
Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria FY17	■		■			■
National Social Safety Nets Project FY16			■	■		■
State Education Program Investment Project (AF) FY16			■	■		
Community and Social Development (AF2) FY16	■		■	■		■
Youth Employment and Social Support (AF) FY16	■		■	■		■
Nigeria State Health Investment Project (AF) FY16			■	■		
Polio Eradication Support Project (AF) FY15			■			
Nigeria Partnership for Education Project FY15			■	■		■
Polio Eradication Support (AF2) FY16			■			
Development Finance Project FY15		■			■	
Program to Support Saving One Million Lives FY15 (P4R)		■	■			■
Third National Fadama Second AF Development Project FY16	■		■		■	■
TOTAL	**7**	**4**	**14**	**7**	**2**	**8**

As demonstrated above, all 16 of Nigeria's projects commit to some form of third party monitoring, involving more than one category in most cases. External monitoring of project-related activities (project progress, implementation, quality control and similar aspects related to its process and/or results) represents the category most frequently cited (14 of 16) for third party monitoring. Seven projects commit to third party monitoring for safeguards compliance. All four projects that incorporate DLIs are monitored by third parties to ensure further disbursement of loans. Almost half the portfolio (7 of 16) commit to utilizing third party monitors for CE activities. Two projects commit to contracting third party monitoring to manage impact evaluations. The details regarding third party monitoring commitments across the various categories are further described in Table 12.

TABLE 12. Third party monitoring commitments in Nigeria (16 of 16 projects)

Project title	Category	Third party monitoring commitments
Better Education Service Delivery for All FY17	Safeguard compliance, DLI	• Third party monitoring by civil society to confirm that environmental and social measures have been carried out. • Independent verification of the DLIs - DLI 2: states will be required to maintain certain records that will be examined by an Independent Verification Agent (IVA) (the National Bureau of Statistics) through random spot checks. - DLI 4: IVA will conduct spot checks at a sample of schools. - DLI 5: Program will rely on an agreed template with verification undertaken by an IVA from local academic or think-tank institutions.
Kaduna State Economic Transformation Program-for-Results FY17	DLI, Project M&E	• The IVA will verify that the DLI Result is met. • Progress toward the achievement of the program's objective will be verified twice a year by the IVA who will provide independent confirmation of the results.
Mineral Sector Support for Economic Diversification Project FY17	Social Safeguards, Project M&E and CE monitoring	• Third party monitoring protocols have been built and will be implemented throughout the project. This includes building independent oversight capacity and stakeholder consultation mechanisms, by providing support to non-state actors (civil society, [NGOs], [CBOs], media, academia, professional associations, and technical experts) to strengthen their participation in increasing transparency and disclosure in the mining industry. • An independent agency will provide assessments of the effectiveness of the Resettlement Action Plan (RAP) strategies in meeting the affected populations' needs.
Agro-Processing, Productivity Enhancement and Livelihood Improvement Support Project FY17	Safeguards and Project M&E	• A Mid-Term Review (MTR) will be conducted at the end of the second year of project execution. It will be an evaluation to be done by an external independent consultant with experience in agriculture and value chain development. The MTR will provide an opportunity to revisit all aspects of the project design and take appropriate actions as needed. • Local Management Unit hires a third party resettlement expert to conduct regular independent audits of the implementation of the Resettlement Policy Framework and Resettlement Action Plan.

Continued

Project title	Category	Third party monitoring commitments
Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria FY17	Safeguards, Project M&E	• Third party independent performance verification will be conducted on an annual basis to complement the internal quality oversight mechanisms. • Safeguards monitoring will be included for a third party monitoring consultant, who will be responsible for ensuring compliance.
National Social Safety Nets Project FY16	Project M&E, CE monitoring	• Independent third party monitors (i.e., CSOs and specialized private firms) will collect feedback from beneficiaries on project performance (e.g., transfers, quality of services and responsiveness to beneficiary challenges) and conduct spot checks. Monitors will present findings during review and decision-making meetings. • Annual Results and Resources Scorecard will be implemented and made public by independent third party (also RF Indicator).
State Education Program Investment Project (AF) FY16	Project M&E, CE monitoring	• Independent Third Party M&E, including third party monitoring by qualified CSOs/CBOs selected competitively, to validate results reported through the monitoring system. Third party monitoring by CSOs will complement the usual M&E mechanism under the project. • Third party assessments of program implementation progress and performance targets by contracting individuals/firms from the private sector, via: Reviews, validations and evaluations during implementation. • Beneficiary Assessments: Qualitative and quantitative surveys will be conducted by an independent consultant at baseline, year 2 and 3.
Community and Social Development (AF2) FY16	Safeguard, Project Monitoring, CE M&E	• If the state of emergency in the North East persists due to the security situation, security constraints may limit access by the government or Bank staff and thus hamper their ability to monitor project implementation effectively. To this end, the project will work with local non-state actors who are present in the region and know the security situation. The non-state actors will work with project components that cannot otherwise be monitored by the Bank and also strengthen project monitoring when state agencieslack monitoring capacity.
Youth Employment and Social Support (AF) FY16	Safeguards, Project Monitoring, CE Monitoring	• Social Safety Net Implementation Agency will engage an independent firm or organization to conduct periodic external assessments of resettlement progress. • Third party monitoring of different processes and results will be undertaken on a quarterly basis to: (1) ensure transparency and compliance with principles of inclusion and equity, (2) gather feedback from communities and beneficiaries on their experiences, and (3) provide additional regular data on project performance and areas for improvement. • The monitoring systems will collect baseline data from primary sources, such as surveys, and secondary sources, such as beneficiary registers and records. Results will be validated by independent third party verification at agreed points.

Project title	Category	Third party monitoring commitments
Nigeria State Health Investment Project (AF) FY16	Project monitoring, CE monitoring	• Third party monitors, local NGOs and other civil society groups for supervision, and monitoring and evaluation will be used. • Third party verification (community client satisfaction surveys) will ascertain the effectiveness of outreach to community. • One IVA will be recruited per state to carry out independent verification of quality of care and service delivery. For example, to ensure patients are not charged any user fees.
Polio Eradication Support Project (AF) FY15	Program monitoring	• EIM (Enhanced Independent Monitoring) used to monitor immunization coverage of in the country.
Nigeria Partnership for Education Project FY15	Project monitoring, CE monitoring	• Independent third party monitoring to validate and support analysis of project performance and implementation, and encourage greater local monitoring and facilitation of school grant. • Implementation and girls' scholarships. • CSOs will also play an active role in third party monitoring, particularly in the monitoring of school level activities.
Polio Eradication Support (AF2) FY16	Project Monitoring	• Third party monitors, local NGOs and other civil society groups for supervision and monitoring and evaluation will be used. • The progress on Routine Immunization will be judged using annual household surveys (SMART) that are conducted by the National Bureau of Statistics in collaboration with stakeholders and technical assistance from UNICEF. SMART surveys provide reasonable state-level estimates of immunization coverage and are carried out by an independent entity without a vested interest in the results.
Development Finance Project FY15	DLIs, Impact Evaluation	• Independent verification of the achievements of the DLIs. • The Project Management Component will fund among other things, independent impact assessments.
Program to Support Saving One Million Lives FY15	DLIs, Project monitoring	• The Government will recruit an IVA will be recruited to independently verify the results achieved and calculate how much should be paid to each state. • The IVA will examine the results of the SMART household surveys and the health facility surveys and calculate how much should be paid to each state. It will also review the results under the other DLIs. • For DLI 3 the IVA will review the survey reports produced by NBS and determine whether the quality assurance mechanisms have been implemented.
Third National Fadama 2nd AF Development Project (FY16)	Impact evaluation, CE monitoring	• The impact evaluation will be carried out by an independent agency. Continuous Social Impact Assessments will be undertaken for the overall project every six months during project implementation. • The use of third party monitors, local NGOs and other civil society groups for supervision and monitoring and evaluation will be explored. • Technical Assistance for quality delivery and impact assessments including functional reviews and third party monitoring.

Third party monitoring appears to be standard in the Nigeria portfolio, included in 100 percent of its 16 assessed projects. Where this approach is combined with an explicit commitment to timely, proactive disclosure of reliable, relevant and actionable findings, third party monitoring can contribute to informed CE. Of the projects that intended to include third party monitoring, eight also committed to some degree of public disclosure as demonstrated in Table 11.

2.3.3 Commitments to public disclosure

Proactive information disclosure entails letting the public know not just about the mere existence of a World Bank project but about its ongoing activity progress and outcomes. This Enabling Environment indicator therefore measures whether a project proactively releases results to the public, including those from CE efforts, over and above Bank-mandated minimal requirements pertaining to Social Safeguards or Results Framework indicators. In other words, this indicator seeks to determine whether a project commits to "reporting out" its progress and results to the public rather than only "reporting up" to Bank officials and if so, how it commits to doing so. This is a crucial aspect of the enabling environment for CE because the capacity of project-affected peoples to shape a project increases when they are accurately and appropriately informed about implementation progress and achievement. Table 12 provides the details of each project's disclosure commitments and their associated mechanisms.

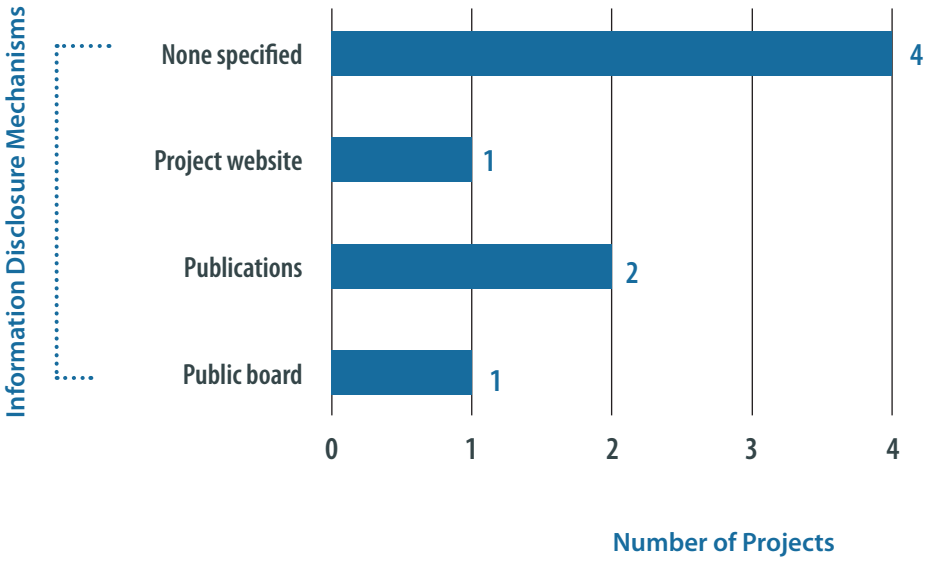
TABLE 13. Proactive disclosure, Nigeria FY15–17 (8 of 16 projects)

Project title	Proactive disclosure commitments
Kaduna State Economic Transformation Program-for-Results FY17	PPP Disclosure Framework adopted, with a web portal established. Disclosure of state and local government (LG) budgets (2017) and audit reports (2015 and 2016). **Mechanism:** Web portal
Multi-Sectoral Crisis Recovery Project for North Eastern Nigeria FY17	The Results Framework will be publicly disclosed and made accessible to the local communities benefiting from the project. **Mechanism:** None
Program to Support Saving One Million Lives FY15	Conduct surveys, verify and disseminate results of a standardized monitoring and assessment survey. **Mechanism:** None
Second AF to Third National Fadama Development Project FY 16	• Document and disseminate specific information on project performance to users and stakeholders. • Provide technical assistance to allow participating states to disseminate project information and guidelines to potential beneficiary communities, as well as their rights and obligations under the project; and to raise awareness of what actions they can take for possible fraud/elite capture during implementation. **Mechanism:** None
National Social Safety Nets Project FY16	Publish annual results and resources scorecard, which will be produced by a third party organization. **Mechanism:** Publication

Project title	Proactive disclosure commitments
Community and Social Development (AF2) FY16	• Social accountability, public disclosure and complaints handling arrangements will be documented in financing agreements. This will include disclosure of the accounts and project activities at a public place in the community and design of a simple complaints mechanism by community members to the agencies. • Accountability will include the following: (1) CPMCs will report to the communities in an open place and prepare simple accounts on a public board for members of the community to view; and (2) routine, simple reports from the Agencies to CPMCs so that they can compare their progress with that of other communities. **Mechanism**: Disclosure at a public place (board) in the community
Nigeria Youth Employment and Social Support (AF) FY16	Third party monitors will disclose annual results of resources scorecard. **Mechanism:** None
Nigeria Partnership for Education Project FY15	Disseminate education publications and reviews. Additional support is committed to projects that disseminate evidence generated by the state. **Mechanism**: Publication

Eight of the 16 projects in the Nigeria portfolio commit to proactive information disclosure related to at least one aspect of the project. Figure 7 shows that only four of these eight document the mechanism through which project information could be disclosed. The mechanisms specified were project website, publications and a bulletin board in a public communal space.

Figure 7. Categorization of Proactive Information Disclosure Mechanisms, Nigeria FY15–17



Among the eight projects with a proactive information disclosure commitment, *the Kaduna State Economic Transformation Program-for-Results (FY17)* and *the Community and Social Development Project (FY16)* stand out. The former is the only project that documents a commitment to publicly disclosing budgets and audit reports through a web portal. The latter provides an atypical level of detail about the public disclosure plans, including specific details about the kind of information that would be disclosed and the platforms through which the information would be disseminated—at a public space for citizens to view. *The National Social Safety Nets (FY16)* and *Nigeria Youth Employment and Social Support projects (FY16)* demonstrate the commitment to publishing project annual results through a third party organization.

The Multi-Sectoral Crisis Recovery Project (FY17) (MSCRP) for North Eastern Nigeria is unique because it showcases CE activities (including GRM and two-way dialogue), in concert with plans for "full and frequent" dissemination of results, as one of the ways the project will mitigate conflicts that could arise because of project activities. Table 14, based directly on project documents, portrays this commitment.

TABLE 14. Public disclosure as a mitigating measure for conflict, Multi-Sectoral Crisis Recovery Project (MSCRP) for North Eastern Nigeria, FY17

Project activities	Potential and associated impacts	Mitigation measures
Direct or indirect impacts on conditions in the North East	Social unrest, potential conflict with local communities, disruption of work, and risks to personnel because of the history of conflict in the North East	Maintain effective two-way dialogue through transparency and disclosure, full and frequent information to the public and concerned NGOs, and established arrangement for community liaison and for handling complaints and grievances.

Despite efforts to specify commitments to public disclosure, four of the projects do not mention the mechanisms that would be used to disclose project information. As a result, there is a question about how citizens will be ensured access to information about the projects, and how the projects consider the best options to inform and consequently engage citizens.

Third party monitoring for CE activities and public disclosure

Given the importance of public access to accurate and timely project implementation information, for fostering a conducive environment for CE, the ARC investigation examined whether and how projects planned to disclose information about the World Bank-prioritized CE activities, or other enabling environment indicators. Significant for each of these areas, public disclosure has particular value for results collected by entities external to and potentially independent from, project management. ARC's guiding hypothesis is that in projects where third party monitoring results are made public, this helps to advance a conducive or enabling environment by encouraging public accountability and transparency in project operations. As a result, these two areas are complementary and mutually reinforcing in creating an enabling environment for citizen engagement.

In the Nigeria portfolio, all eight projects with proactive disclosure commitments also committed to some form of third party monitoring during the project lifecycle. Seven of these eight projects specifically committed to disclosing some or all of the results from the third party monitoring. Four Nigeria projects (25 percent of the portfolio) have intersecting third-party monitoring and public disclosure commitments. This is depicted in Figure 8 with details provided in Table 15.

Figure 8. Intersection of third party monitoring for CE and Proactive information disclosure commitments, Nigeria FY15–FY17 (4 of 16 projects)

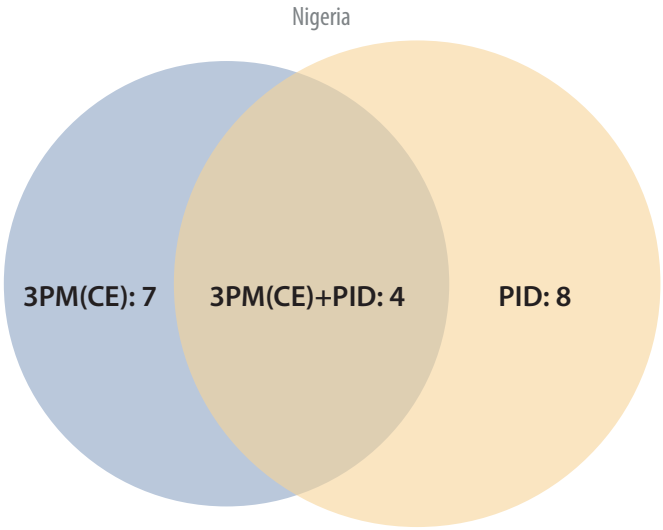


Figure 8 shows that of the seven projects committing to engaging third parties to monitor CE activities, four also commit to sharing some portion of these CE results publicly. Table 14 highlights these commitments.

TABLE 15. **Projects with commitments to third party monitoring for CE and public disclosure of those results**

Project title	Third party monitoring of CE	Proactive information disclosure
National Social Safety Nets Project FY16	Independent third party monitors (i.e., CSOs and specialized private firms) will collect feedback from beneficiaries on project performance (e.g., transfers, quality of services and responsiveness to beneficiary challenges) and conduct spot checks.	Commitment to publishing annual results and resources scorecard, which will be produced by a third party organization.
Nigeria Youth Employment and Social Support (AF) FY16	Third party to collect feedback from communities and beneficiaries on their experiences	Third party monitors will disclose annual results of resources scorecard.
Nigeria Partnership for Education Project FY15	CSOs will also play an active role in third party monitoring, particularly in the monitoring of school level activities.	Commitment to disseminate education publications and reviews. Additional support is committed to projects that disseminate evidence generated by the state.
Community and Social Development (AF2) FY16	Overall CE Monitoring	Social accountability, public disclosure and complaints handling arrangements will be documented in the financing agreements including disclosure of the accounts and project activities at a public place in the community, and design of a simple complaints mechanism by community members to the Agencies. Accountability will include the following: (1) Reports to the communities in an open place and prepare simple accounts on a public board for members of the community to view; and (2) routine progress can be compared among communities.

III. Conclusion

This report provides the first insights into whether and how the World Bank is incorporating its CE commitments in project design in 16 active projects in Nigeria from FY15–17. The portfolio spans multiple sectors, with the majority of projects in social development and agriculture/fishing/forestry areas.

Across the Nigeria portfolio, projects after FY15—the first benchmark after the introduction of the CE Strategy in 2014—have greater commitments to citizen engagement. This shows a certain level of the Bank's progress and efforts in engaging citizens and creating an environment that facilitates their participation in project planning and implementation.

The quantitative analysis shows consistent application of the CE agenda in design across the majority of the Nigeria portfolio. About two-thirds of the 16 assessed Nigeria projects commit to at least six of the seven World Bank-prioritized areas for CE (12 out of 16 projects). At the highest commitment level, there are four Nigeria projects that commit to integrating CE at each of the seven stages prioritized in the CE Strategy, and seven other projects that commit to all but one of these areas. There are no projects that have zero CE commitments, and only one has a single CE commitment.

Project monitoring findings from the Results Framework shows relative consistency across the Nigeria portfolio in terms of a country-wide approach to monitoring CE. All World Bank projects must include a Results Framework which incorporates a small number of indicators that explain how the project development objective (PDO) is to be achieved. For indicators chosen for a project's Results Framework, a project must explain how the data collected will be used over the course of project implementation and the results must be publicly disclosed at intervals throughout the life of the project, as well as at project completion. Because of the public disclosure requirement, Results Framework indicators on CE offer an opportunity for accountability.

Three out of four Nigeria projects that do not include at least one CE indicator (World Bank mandate) are all from FY15, the first year of the new protocol. Of the 16 Nigeria projects, 12 include at least one indicator that will measure an aspect of CE, the results for which will be publicly disclosed. Of these 12 projects, half includes an additional indicator dedicated to measuring another aspect of the project's CE commitment. Four projects do not meet the institutional mandate, by not tracking any CE efforts within their Results Frameworks. These four projects have exempted themselves from accountability related to tracking or disclosing even minimal information about their CE efforts. It is important to note that three of these four projects without a CE indicator are the oldest (approved early in FY15) in the FY15–17 portfolio. This may reflect that when these projects were designed the new CE mandate had not yet been operationalized at the country-level.

Social sector projects have the greatest CE commitments. Of the 11 projects that document the highest number of CE commitments (in six or seven of World Bank-prioritized areas, and at least two indicators of an enabling environment for CE), six are social projects (education, community driven development, social protection, etc.). The health sector is on the low end of CE commitments.

The fiscal year in which a project received approval is the main indicator of the degree to which it commits to integrating CE mechanisms. As already discussed, three of the four projects from FY15 do not have CE indicators. The only additional project in the portfolio that lacks a CE indicator is from 2016 and is an additional financing project related to one of the FY15 projects without a CE indicator.

Nigeria projects show a high level of commitment to the incorporation of third party monitoring and citizen led-monitoring. Among the Nigeria projects, all of the 16 projects document a commitment to hiring third party entities to independently monitor project activities. Furthermore, 12 projects commit to citizen monitoring efforts. Finally, 11 projects in the portfolio include both these external monitoring commitments (professional third party entities and citizen involvement in monitoring).

Half of the projects in the portfolio which have independent monitoring commitments also include proactive information disclosure commitments. Eight projects in Nigeria agree to proactive disclosure of results, including citizen engagement findings (i.e., half of the 16 projects that include commitments to independent project monitoring (professional or citizen-led) involve commitments to public disclosure of project information). Therefore, even though the majority of Nigeria projects say they plan to increase project accountability by having non-project actors monitor results, only half of them have committed to providing the public with these independent results. This significantly reduces the likelihood that the public can hold the projects to account.

Six of the eight projects that commit to public disclosure of project results also commit to third party monitoring, citizen monitoring and measures for proactive inclusion. Third party monitoring in and of itself does not necessarily translate into public accountability. The Nigeria portfolio findings show that those projects committed to promoting transparency by disclosing project results, include professional or citizen-led third party monitoring in their efforts to be accountable.

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Endnotes

1. See https://consultations.worldbank.org/Data/hub/files/consultation-template/engaging-citizens-improved-resultsopenconsultationtemplate/materials/finalstrategicframeworkforce.pdf, accessed 21 February, 2019.

2. The World Bank Group encompasses five distinct international organizations including: **The International Bank for Reconstruction and Development (IBRD)** and **the International Development Association (IDA)**, which work primarily with governments; **the International Finance Corporation (IFC)** and **the Multilateral Investment Guarantee Agency (MIGA)**, which support private sector investment, and **the International Centre for Settlement of Investment Disputes (ICSID)**, which adjudicates investment disputes that arise international private sector companies and governments. This CE investigation focuses on the two government-serving WBG branches, **IBRD** and **IDA**, which together are most commonly known collectively under the umbrella moniker the "World Bank". This oftentimes confusing title of World Bank for just two of the five entities that comprise the WBG results because "the IBRD and IDA constitute the World Bank proper, while the ICSID, IFC and MIGA are 'afiliates' that 'are closely associated with the World Bank'" (Bebbington et al 2006:10). Owned and managed by its 189 country members, IBRD/IDA (henceforth referred to as the "the World Bank") provided 71 percent of the WBG's 2017 global financial assistance ($42.1 billion of the total $59 billion provided, World Bank 2017:4). The primary vehicles through which the World Bank provides financial assistance are autonomous projects, also called operations.

3. Induced participation is differentiated from organic participation which can be spontaneous or when organized, done so "by civic groups outside government, sometimes in opposition to it" (Mansuri and Rao 2013:xi).

4. The CE Strategy describes categories of citizen engagement mechanisms as follows: *Consultations; GRMs; collecting, recording, and reporting on inputs received from citizens; collaboration in decision-making; citizen-led monitoring, evaluation, or oversight; empowering citizens with resources and authority over their use; and citizen capacity building for engagement* (Manroth 2014:31). The ARC assessment includes all CE Strategy categories except "empowering citizens without resources and authority over their use" for several key reasons. First, as described in the strategy, the only kinds of Bank projects that are in the position to implement mechanisms in this category are those designed to be community driven development and therefore does not pertain the majority of World Bank operations. By creating a CE category that only projects utilizing a CDD approach can fulfil, the strategy privileges this particular development model and creates a high-level category into which, by definition, no other types of projects could reach. Furthermore, this framing takes for granted that the kinds of participatory mechanisms that comprise CDD approaches will lead to empowerment among those participating in the project. Although this study does not discount the benefit of CDD approaches and the embedded participatory opportunities it creates, it does not accept the underlying premise that by their implementation empowerment is achieved (see Mansuri and Rao 2013). Therefore, the ARC assessment did not utilize this category, understanding that participatory mechanisms that are part of the design of CDD operations will be captured in the other categories.

5. CDD is defined at the World Bank as "an approach that gives control over planning decisions and investment resources for local development projects to community groups" (World Bank 2018b).

6. This assessment focuses on IPF operations, the subject of the World Bank's CE corporate mandate, but it includes one Program-for-Results (P4R) operation. P4R differs from IPF because, in principle, financing is dedicated to a client country's own development program rather than an autonomous World Bank project (i.e., Investment Project Financing "supports specific projects and disburses against specific expenditures and transactions" while P4R "supports government programs and disburses against results" (World Bank 2015:1). The P4R "disbursement against results" means that funds transfer depends upon the achievement of agreed upon interim results (DLIs—a financing mechanism that IPF operations are also now increasingly utilizing). Furthermore, P4R is not subject to Social Safeguard policies but instead must undertake an Environmental and Social Systems Assessment (ESSA, World Bank 2012:23). Although the World Bank is not monitoring P4R operations as part of the corporate mandate for citizen engagement, these operations are still of considerable concern for the public in borrowing countries. Since the World Bank has steadily increased its use of P4R financing since creating the instrument in 2012, it is important to also understand the opportunities (and/or obstacles to CE) that exist in P4R-based operations, and where relevant, ARC includes P4R operations in the analysis. See http://www.worldbank.org/en/programs/program-for-results-financing for more information.

7. Nigeria does not legally categorize any of its different ethnic populations as "indigenous," and therefore this social safeguard (O.P./B.P. 4.12) does not apply in the World Bank's Nigeria work.

8. The World Bank requires that the outcomes for indicators included in a project's results framework be made public. However, the process by which these results are considered to meet this requirement is through bi-annual Implementation Status and Results Reports (ISRs). These short documents which typically include basic numerical reporting and minimal accounting of process or explanatory detail, are made available only via the project pages of the World Bank's website.

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