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Taking action against corruption in Nigeria

Empowering anti-corruption role models and coalitions to change social norms

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Summary

- Despite some successes with anti-corruption reforms, corruption has long held back Nigeria's development, undermining the country's democracy, governance and economic growth, while eroding public trust in institutions. Analysis of Nigeria's anti-corruption efforts over the last 25 years reveals uneven progress, too often set back by politicization, weak institutions and double standards among leaders. The endemic nature of corruption has instead led to political clientelism and impunity, undermined attempts at meaningful policy implementation and prevented the creation of strong accountability mechanisms.
- Drawing on findings from each of the Chatham House Africa Programme's Social Norms and Accountable Governance (SNAG) project's household surveys and supporting research, this paper argues for a shift in anti-corruption approach from a series of often isolated campaigns towards a more networked and participatory strategy. In particular, the paper highlights the crucial role of 'integrity role models' credible individuals resisting corruption and championing reforms and behavioural change within Nigeria's institutions, government and society, despite steep challenges and considerable personal costs.
- Institutions are not self-enforcing. Neither are reforms self-implementing. In corrupted systems, credible, competent and influential individuals are therefore crucial for 'seeding' new norms (modelling and making visible positive behaviour) and catalysing change. The abandonment of established norms and practices often comes with costs, and requires credible people willing to take the lead and demonstrate to others that it is possible to do things differently. These individuals bear the initial risks and costs of standing up against corruption, despite the immense pressures against doing so.
- The findings of the SNAG project's fourth national household survey show the scale of Nigeria's corruption challenge. The survey found that a majority of respondents 59.2 per cent believed that power was considered more important than honesty in their community, while 61.5 per cent believed that others in the community would be willing to compromise their ethical values for control of scarce resources. Many individuals see their communities and Nigerian society at large as places where honesty and integrity are valued less than power and the control of resources. As a result, compromising personally held values is tolerated, deemed acceptable or seen as unavoidable. However, the survey also showed that a large majority of Nigerians 73.4 per cent agreed that most people in their community 'feel bad when someone is being taken advantage of', highlighting the existence of shared values of empathy and fairness.

- These contrasting views demonstrate the complicated and ambivalent relationship most Nigerians have with corruption. Many Nigerians recognize it as a real problem but feel resigned, sensing that it is the price for getting things done. The persistence of corruption can lead people to view anti-corruption measures with scepticism. As a result, people often doubt the sincerity of government reforms and initiatives and their potential for success.
- Shifting to a so-called 'network-based' approach to fighting corruption could help to change this. Better coordination with and between reform-minded lawmakers, professional networks, grassroots leaders and individuals can have a positive influence on public opinion, and both inspire and sustain collective action. This approach would leverage the influence of integrity role models in promoting changes to social norms as an enabler of legally binding reforms. It offers a way to achieve mobilization and pressure at different levels of Nigerian society, through building links between reformers, using the logic of networked solidarity, capacity and shared learning.
- While top—down reform agendas can lead to institutional change, such 'big bang' approaches are rare and the political will to initiate them still requires a collective, political and strategic process. Therefore, a more context-aware approach is essential one that aims to overcome barriers to cooperation and form influential coalitions of role models and pro-reform organizations. Strong coalitions can effectively challenge the status quo, capitalize on reform opportunities and enact change in a way that is perceived as locally legitimate. This paper proposes a series of recommendations to help develop such an approach:
 - Implement legal reforms to accelerate norm change and meet communal expectations of fairness and accountability by mandating public asset declarations for officials and ensuring public access to these records. The government should strengthen existing frameworks, like the Code of Conduct Bureau, and enhance collaboration between anti-corruption agencies and financial institutions to promote transparency and community involvement in the management of recovered assets.
 - Protect integrity role models from retaliation and speed up judicial procedures through comprehensive protection programmes, including confidential reporting channels, legal safeguards, safety protocols and mental health support. The urgent enactment of whistleblower legislation by the National Assembly is crucial to portray whistleblowing as courageous and commendable. Additionally, establishing special courts for corruption cases would speed up judicial processes and reinforce societal attitudes against corruption.
 - Use technology to increase transparency at state and local levels through e-procurement systems, empowered audit offices, and legal frameworks for tracking project funds to promote collective accountability and encourage citizen engagement in governance. Expanding digital tools and open data initiatives can streamline bureaucracy and strengthen oversight, ultimately reducing corruption, increasing efficiency and enhancing public trust.

- Emphasize integrity by using examples of role models to cultivate deeper collective values among young people and promote generational shifts.
 Recognizing individuals who resist corrupt norms fosters a culture of integrity and accountability.
- Train integrity role models in diplomacy and strategic thinking to help them
 manage political and interpersonal challenges. Leadership training should
 focus on ethics and decision-making, along with providing resources for risk
 assessments and insights from successful anti-corruption strategies.
- Build networks to bring reformers together and amplify their voices through
 resource hubs to share experiences and best practices, fostering solidarity
 and shared values. Expanding these networks to include partnerships
 between government agencies and NGOs, along with multi-stakeholder
 coalitions, can enhance anti-corruption collaboration.
- Seek international support for socially meaningful penalties, especially after the US's recent decision to suspend enforcement of the Foreign Corrupt Practices Act. Nigeria's other partners, such as the UK, must increase funding for anti-corruption bodies to allow for effective investigations and enforcement. Implementing visa bans on officials credibly implicated in corruption can raise personal costs for corrupt behaviour and strengthen societal accountability.

01 Introduction

Corruption has caused a crisis of trust in Nigeria's institutions and society. Showcasing and bringing together individuals who resist corruption can help change underlying social norms and support collective action.

The prevalence of corruption has long held back Nigeria's development. A report by the country's auditor-general in 2020 revealed nearly \$117 million in government contract fraud and procurement violations in that year,¹ although this figure likely represents only a fraction of the actual total. High-profile cases such as the extensive bribery scheme involving Glencore, one of the world's largest trading and mining companies, which included over \$52 million in bribes to intermediaries in Nigeria,² and the \$80 million money laundering and embezzlement case against former state governor James Ibori,³ highlight the issue. The recent announcement of an agreement between the US and Nigeria for the transfer of \$52.9 million in forfeited corrupt proceeds⁴ underscores the complex nature of corruption, its widespread

¹ Office of the Auditor General of the Federation (2024), Annual Audit Report on Non-Compliance-Internal Control Weakness in Ministries, Departments and Agencies (MDAs) of the Federal Republic of Nigeria for the Year ended 31st December 2020, https://oaugf.ng/docman/42-annual-report-on-non-compliance-internal-control-weakness. The annual report on non-compliance and internal control weaknesses, published in 2024, identified that the national treasury had been defrauded of at least \$4.3 million through contract award irregularities, over \$99 million in payments for non-executed contracts and \$12 million in due process violations.

² Glencore agreed to pay \$50 million to Nigeria as penalty and compensation, following a global coordinated resolution with authorities from the US, the UK and Brazil regarding a widespread bribery scheme that spanned over a decade (between 2007 and 2018) and impacted more than seven countries across two continents. In Nigeria, the company and its subsidiaries bribed officials for special oil deals. See US Department of Justice (2022), 'Glencore Entered Guilty Pleas to Foreign Bribery and Market Manipulation Schemes', press release, 24 May 2022, https://www.justice.gov/archives/opa/pr/glencore-entered-guilty-pleas-foreign-bribery-and-market-manipulation-schemes; Judiciary of England and Wales (2022), 'The Serious Fraud Office v Glencore Energy UK Ltd: Sentencing Remarks of Mr Justice Fraser, Southwark Crown Court, 3 November 2022', https://www.judiciary.uk/wp-content/uploads/2022/11/Sentencing-Remarks-Glencore.pdf.

³ A former governor of Delta State (1999–2007), Ibori was implicated in a corruption case involving money laundering and embezzlement of millions in funds from his state, which was one of Nigeria's wealthiest states and biggest oil producers. Convicted in the UK in 2012, Ibori received a 13-year prison sentence, highlighting systemic corruption in Nigeria. After his release in 2016, efforts were made to recover his stolen assets. See UK Crown Prosecution Service (2023), 'A former Governor of Nigeria's Delta State has been ordered to pay over £100 million and his solicitor over £28 million', press release, 24 July 2023, https://www.cps.gov.uk/cps/news/former-governor-nigerias-delta-state-has-been-ordered-pay-over-ps100-million-and-his.

⁴ The transfer stems from the forfeiture of assets obtained through a scheme involving bribery, money laundering and other illegal acts in violation of Nigerian and US law. The violations took place between 2011 and 2015, involving Nigerian businessmen Kolawole Aluko and Olajide Omokore who paid bribes to Nigeria's former minister for petroleum resources (2010–15), Diezani Alison-Madueke. In return, Alison-Madueke used her influence to steer lucrative oil contracts to companies owned by Aluko and Omokore. See US Department of Justice (2025),

impacts and the critical need for global cooperation in anti-corruption efforts. Additionally, the 2012 misappropriation case involving \$2.1 billion in pension funds for retired Nigerian police officers⁵ illustrates the persistent challenges Nigeria faces in prosecuting and punishing those involved in corruption.

Corruption has remained endemic in Nigeria, despite multiple attempts at reform by successive administrations. The perennial failure to reduce corruption at both its grand and petty scales⁶ has prevented the establishment of a genuine and robust social contract between the government and its citizens, and undermined both formal institutions and the delivery of basic services. Consequently, many Nigerians must rely on informal and exploitative survival strategies as they strive to navigate their everyday lives, which in turn perpetuates the corruption that causes the problem.

Extensive research by Chatham House and others shows that Nigerians largely oppose corruption and would welcome support in resisting it. Survey data also confirm that a majority of Nigerians consider addressing corruption to be crucial for improving the country's governance and sociopolitical conditions, and show that most individuals both morally disapprove of corruption and acknowledge its harmful effects on society. However, in societies such as Nigeria, corruption is seen simply as the price for getting things done. This notion is reinforced by a perception that there is no accountability for those who engage in corrupt practices, and higher risks for those who do not. Where corruption provides an alternative means of survival and a solution (of sorts) to governance

^{&#}x27;United States Enters into Agreement with Nigeria to Transfer \$52.88 million in Forfeited Corruption Proceeds for Uses to Benefit the Nigerian People', press release, 10 January 2025, https://www.justice.gov/archives/opa/ pr/united-states-enters-agreement-nigeria-transfer-5288m-forfeited-corruption-proceeds-uses. For the full text of the agreement, see US Department of Justice (2025), Agreement Between The United States Of America And The Federal Republic Of Nigeria Regarding The Transfer, Repatriation, Disposition, And Management Of Certain Assets Forfeited To The United States Of America In United States V. M/Y Galactica Star Et Al., Case No. 4:17-cv-02166 (S.D. Tex) And United States V. Real Property Located In Los Angeles, Calif. Commonly Known As 755 Sarbonne Road, Case No. 4:20-cv-02524 (S.D. Tex.), https://www.justice.gov/archives/opa/media/1383791/dl. 5 Nigeria's Economic and Financial Crimes Commission (EFCC) charged John Yakubu Yusuf, a former assistant director in the police pension office, and five other civil servants for fraud and embezzlement. Yusuf was initially convicted and sentenced to two years' imprisonment with an option of N750,000 fine by an Abuja court in 2013. The EFCC challenged the judgement at an appellate court and secured a longer sentence of six years and the return of N22.9 billion in 2018. Yusuf subsequently went on the run until 2020 when he was rearrested. The supreme court upheld his six-year sentence and N22.9 billion fine in 2022. See Economic and Financial Crimes Commission (2022), 'N22.9BN Fraud: Supreme Court Affirms Six-Year Jail Term For Former Pension Director, John Yusuf', press release, 13 April 2022, https://www.efcc.gov.ng/efcc/news-and-information/news-release/7948-n22-9bn-fraudsupreme-court-affirms-six-year-jail-term-for-former-pension-director-john-yusuf#:~:text=The%20EFCC%20had

^{%20}in%20June,billion%20of%20Police%20Pension%20Fund.

6 A UN and Nigerian Bureau of Statistics survey estimated that Nigerians paid approximately \$4.6 billion in bribes to public officials from June 2015 to May 2016, \$400 million in May 2018 to June 2019 and \$1.26 billion between November 2022 and October 2023 (the fluctuating rates represent some changes to bribery practices but also to exchange rate changes due to the depreciation of the national currency).

⁷ See Hoffmann, L. K. and Patel, R. N. (2022), *Vote-selling behaviour and democratic dissatisfaction in Nigeria*, Chatham House Briefing, https://www.chathamhouse.org/2022/07/vote-selling-behaviour-and-democratic-dissatisfaction-nigeria.

⁸ In a June 2024 public opinion poll conducted by NOIPolls, more respondents identified corruption as the major challenging facing democratic governance in Nigeria than any other issue mentioned. In response to the polling question, 26 per cent of adult Nigerians cited corruption as the country's main challenge. See NOIPolls (2024), *Democracy Day Polls*, 12 June 2024, https://www.noi-polls.com/post/democracy-nigeria.

⁹ Corruption was ranked fourth among the most important problems affecting the country in 2023, after the cost of living, insecurity and unemployment, according to a national survey of 33,035 households conducted by UNODC. See UN Office on Drugs and Crime (2024), *Corruption in Nigeria: Patterns and Trends: Third survey on corruption as experienced by the population*, report, Vienna: UNODC, https://www.unodc.org/conig/uploads/documents/3rd_national_corruption_survey_report_2024_07_09.pdf.

¹⁰ According to Ajit Mishra, '...when there are many corrupt individuals in the society, it becomes optimal to be corrupt despite the presence of anti-corruption policies and incentives. This way corrupt behaviour becomes the equilibrium behaviour or the social norm...'. See Mishra, A. (2005), 'Corruption: A Review', in Mishra, A. (ed.) (2005), *Economics of Corruption*, pp. 3–35, New Delhi: Oxford University Press.

problems, it is difficult to convince people to abandon it, even when it is a key cause of societal challenges.¹¹

Years of rampant corruption and impunity have eroded the legitimacy of Nigerian leaders and institutions in the eyes of the public, diminishing their ability to unite citizens and build consensus. As a result, reform proposals are insufficient without the overhaul of the political, economic and social systems that enable corruption to thrive. Powerful incentives that enable elites to evade accountability and perpetuate the status quo must first be dismantled. Nigeria's political party system, for example, must undergo significant reforms to regulate party financing and promote internal democracy, ensuring that credible and legitimate candidates and groups are attracted, elevated and rewarded within the system. Critical sectors and their governing institutions – such as the justice system, law enforcement, and election management – also need meaningful reforms to enhance their effectiveness and public integrity.

In challenging political or institutional environments, values such as integrity, transparency and public service need role models to demonstrate them.

However, these institutions are not self-enforcing. Neither will the necessary reforms be self-implementing. ¹³ Without credible and motivated individuals who can champion the cause of institutional integrity and reform, even the most well-designed systems can falter, resulting in superficial outcomes. In challenging political or institutional environments, values such as integrity, transparency and public service need role models to demonstrate them.

Despite Nigeria's challenging environment, there are credible and motivated individuals working on reforms and behavioural change within its institutions, government and society. These individuals are often disconnected, poorly networked and overlooked. They face steep challenges and considerable personal costs for their actions. But given the right support, they can offer critical leadership and inspiration for meaningful action against corruption.

¹¹ Individuals expect others to act unethically and in turn believe they need to prioritize the individual benefits they gain from corruption over long-term consequences for the wider community. Changing these complex and reciprocal patterns is a collective action problem. Norms of reciprocity sustain coping strategies through familial or ethnic ties, social connections and patron-client relationships and build informal networks, 'resulting in economies of favours', where people are guaranteed access to benefits and compelled to participate because there are no other alternatives provided by formal institutions. See Makovicky, N. and Henig, D. (2018), 'Introduction: economies of favours', in Ledeneva, A. et al. (eds) (2018), Global Encyclopaedia of Informality, vol. 1, pp. 35-40, London: UCL Press. 12 Persson, A., Rothstein, B. and Teorell, J. (2013), 'Why Anticorruption Reforms Fail-Systemic Corruption as a Collective Action Problem', Governance, 26(3), pp. 449-71. https://doi.org/10.1111/gove.1604. 13 Claire Mcloughlin and David Hudson put it this way: 'Institutions do not set-up institutions, people do. Institutions are not empty boxes that float freely above societies and determine outcomes independently of human interaction...they are sustained created, sustained, used and transformed through the purposive actions of individuals,' See Mcloughlin, C. and Hudson, D. (2018), Inside the black box of political will: 10 years of findings from the Developmental Leadership Programme, Developmental Leadership Programme Report, https://dlprog.org/ wp-content/uploads/publications/inside-the-black-box-of-political-will-10-years-of-findings-from-the-developmentalleadership-program.pdf. Furthermore, institutions thrive or fail based on the actions of individual agents, whether they are opportunists, subversives, or outright rebels, who choose to defend or challenge them. See Mahoney, J. and Thelen, K. (2010), 'A Theory of Gradual Institutional Change', in Mahoney, J. and Thelen, K. (eds.) (2010), Explaining Institutional Change: Ambiguity, Agency, and Power, Cambridge: Cambridge University Press.

Such role models can help galvanize efforts to reject corruption and overcome distrust. By acting with personal integrity, they lower the cost of doing the right thing for others and can inspire change. While bringing together credible reformers in 'networked coalitions' (see Box 1) is not a cure for ending corruption, it is necessary for implanting and implementing lasting solutions to the problem.

Box 1. Understanding 'networked coalitions'

A 'networked coalitions' approach to fighting corruption may offer a productive way to achieve mobilization and build pressure, by connecting key reformers at all levels of Nigerian society. Networked coalitions are groups and alliances formed through relationships between individuals, organizations and communities, and which work together to achieve common causes or specific policy goals that promote collective goods. (Networked coalitions can also be referred to as 'anti-corruption clubs'.) For example, the Ghana Anti-Corruption Coalition, which was founded in 1999 by cohorts of government officials, anti-corruption agency officials and civil society actors including business, news media and religious bodies, represented an unprecedented scale of coalition-building in the country, and has been examined as an important case study. (15)

The main idea behind such an approach is to leverage the power of networks to create more flexible, dynamic and distributed campaigning coalitions. Such coalitions pool and share diverse resources, expertise and connections to tackle complex issues, advocate for change or amplify messages and desirable behaviours. Through such methods, they make it easier for people to either adopt positive social norms or engage in collective action.

Coalitions often leverage technology or communication networks to coordinate their efforts, share information and mobilize support in a more dynamic and flexible manner than traditional hierarchical organizations. This allows them to adapt to social norms in different contexts (urban or rural, for example), ensuring that their interventions are relevant and effective to the target audience.

The main points to note about networked coalitions are that:

- They represent a shift away from top-down, centralized efforts which can be slow to adapt to changing or different contexts.
- They focus on broader missions for longer-term systemic change and a larger diversity of members.
- They attempt to build and strengthen relationships between those involved.

¹⁴ Examples of campaigns operating in networked coalitions include Team Internet, SaveTheLink and Battle for the Net. These campaigns are focused on privacy, censorship and surveillance in technology, and involve non-profits, private companies and individuals. See Blueprints for Change (2018), 'How to Build Networked Coalitions', report, The Commons Social Change Library, https://commonslibrary.org/how-to-building-networked-coalitions.

¹⁵ Johnston, M. and Kpundeh, S. J. (2002), *Building a Clean Machine: Anti-Corruption Coalitions and Sustainable Reform*, working paper, Washington, DC: World Bank, https://documents.worldbank.org/en/publication/documents-reports/documentdetail/661541468771713991/building-a-clean-machine-anti-corruption-coalitions-and-sustainable-reform.

¹⁶ Working through networked coalitions focused on facilitating broad, inclusive alliances may not be suitable when a specific legislative change is the only goal or big stakeholders wish to centralize and control messaging and campaign actions. Network members need to respect diversity of tactics and communication styles to serve different communities.

¹⁷ For instance, Grameen Bank's successful microfinance model adapted to the social norms of rural Bangladesh by leveraging peer-group networks (for example, small groups of men or women from the same community) that are sensitive to local customs, community structures and social pressures to minimize default risks.

- They operate at a variety of scales (local to global, multi-scaled, multi-sited)
 but emphasizing local ownership, local actions and participation (with grassroots leadership).
- Their leadership and decision-making are distributed, rather than concentrated in a central body.
- They are vehicles for creating and projecting reform narratives which is vital for legitimizing new ideas and public persuasion.

Working through networked coalitions requires a focus on facilitating broad, inclusive alliances in support of goals like specific legislative changes or the adoption of government policy. This support network must maintain focus, even when legislation is passed or policies adopted, to drive the campaign for implementation. Building relationships between the different parts of the network is key. Even though actors may be like-minded, alignment is not always guaranteed. Trust-building between actors requires repetitive interactions and reciprocal exchanges to strengthen network connections and ensure network actions are long-term and sustainable.¹⁸

Anti-corruption practitioners and organizations focused on influencing norms and promoting reforms in Nigeria can enhance the visibility and desirability of positive behaviours and reforms through collaboration. This increased visibility could help shift empirical expectations (i.e. beliefs about people's actions) and legitimize new sets of ideas and actions. In this research paper, the term 'networked coalitions' is predominantly used to emphasize the importance of locally owned, multi-scaled collaboration among stakeholders involved in transparency, accountability and anti-corruption efforts in Nigeria. It highlights the need for these actors and coalitions to connect, communicate and coordinate their efforts to foster broader and more dynamic citizen mobilization across the country's diverse geographical, social and ethnic landscapes.

The extent to which meaningful cooperation can be mobilized would not only depend on shared interests and intense discontent with the status quo. Mobilizing meaningful collective action is neither formulaic nor cost-free. It requires critical material resources (such as money, labour or technology) and non-material resources that motivate participation and facilitate coordination (such as leadership, consensus and moral engagement). In addition, researchers suggest that relationships, norms and experiences stemming from past actions taken by stakeholder groups, and the strength of the connections among members, can lower the costs associated with coordination interests and turn shared discontent into action.

¹⁸ The author acknowledges and appreciates reviewer 3 for providing this insight in their comment.

¹⁹ Social movement researchers indicate that for specific causes, collective action arises from a robust sense of group identity or 'consciousness'. In this context, the movement serves as a central element in shaping an individual's self-definition, with participation in the movement representing a nuanced interplay between collective identity and personal affirmation. See Della Porta, D. and Diani, M. (2006), 'Social movements: an introduction', second edition, Oxford: Blackwell Publishing, p. 177. Examples of identity-based group actions are the peasant uprising in Korea, civil rights activism by the Mississippi Freedom Summer Project and the pro-life movement in the US. Successful mobilization makes future mobilization less costly and 'groups that have mobilised in the past are more likely to collectively mobilise in the future than groups that have never mobilised.' See Johnston, H., Laraña, E. and Gusfield, J. R. (1994), 'Identities, grievances, and new social movements', in Larana, E., Johnston, H. and Gusfield, J. R. (eds) (1994), *New social movements: From ideology to identity, Philadelphia: Temple University Press, p. 8.

Methodology

Since 2015, the Chatham House Africa Programme's Social Norms and Accountable Governance (SNAG) project has been investigating the role of behavioural dynamics, particularly social norms, in sustaining corruption in Nigeria. ²⁰ Social norms are understood as the unwritten rules that govern the 'right' way to behave for members of a group; these are the rules that strongly influence individual decisions and behaviour. ²¹ Social norms determine accepted or disapproved forms of behaviour, and are maintained through social rewards such as group acceptance, respectability and status for compliance; or in sanctions such as public shaming, loss of credibility and isolation for non-compliance. ²² They help people coordinate their behaviour and one person's decision to change is typically conditional on others also changing. ²³

While social norms are not the only factor²⁴ to be considered in designing and implementing laws and policies, they 'can act as a brake on interventions'.²⁵ Most policy interventions focus on introducing or changing official rules, but changes such as these do not magically erase informal rules or social pressures. For instance, evidence from previous SNAG research has highlighted how social pressures of religious giving, in-group favouritism or obligations to one's social group, displays of wealth and social norms of reciprocity combine to raise the tolerance for certain forms of embezzlement and fraud in Nigeria. Petty bribery persists in part because widespread misunderstandings about what others think and do – known as 'pluralistic ignorance'²⁶ – trap people in behavioural patterns they personally disapprove of.²⁷ SNAG research has also highlighted a pyramid of norms and expectations within Nigerian law enforcement, where bribes are systematically passed up the chain of command. Despite perpetuating extortionate bribery practices, fulfilment of these entrenched expectations by officers is rewarded and refusal to comply becomes risky.

²⁰ The SNAG project has focused on providing specialized evidence of the underlying causes of day-to-day corrupt practices to support the formulation of effective, context-specific policies and interventions against them.

21 Hoffmann, L. K. and Patel, R. N. (2017), Collective Action on Corruption in Nigeria: A Social Norms

Approach to Connecting Society and Institutions, report, London: Royal Institute of International Affairs, https://www.chathamhouse.org/sites/default/files/publications/research/2017-05-17-corruption-nigeria-hoffmann-patel-final.pdf.

²² Not all widespread or 'normal' behaviours or practices are driven by social norms. For example, motorcycle taxi riders (popularly known as *Okada*) in Nigeria not wearing safety helmets is normal practice because those individuals typically cannot afford the cost of a helmet but are under pressure to earn a daily income. Therefore, they calculate their safety risks as lower than the tangible reality of hunger. Because social norms are sustained by people's desire to conform to other people's expectations of them or the rules of belonging to a certain group, changing practices sustained by them is difficult. For instance, various laws banning *okada* from operating without helmets have been difficult to enforce because they fail to address cost and livelihood pressures faced by commercial riders and strong social norms of bribery solicitation for traffic law violations among law enforcement agents.

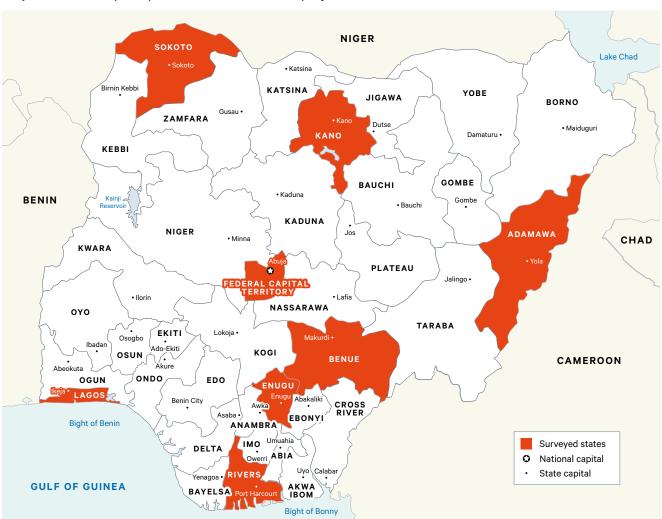
23 Bicchieri, C., Dimant, E., Gelfand, M. and Sonderegger, S. (2022), 'Social norms and behavior change: The interdisciplinary research frontier', *Journal of Economic Behavior & Organization*, 199, pp. 504–16. https://doi.org/10.1016/j.jebo.2022.11.007.

²⁴ Individual factors (such as attitudes, beliefs, knowledge, morals), other societal factors (like social networks, availability of models), structural factors (laws, policies, political institutions, criminal justice systems, etc.) and material factors (public services, infrastructure, etc.) also influence behaviour and ought to be considered in intervention design.

²⁵ Chigas, D. and Dininio, P. (2019), *Strengthening Rule of Law Approaches to Address Organized Crime: Social Norms*, white paper, USAID Bureau for Africa, August 2019, https://www.corruptionjusticeandlegitimacy.org/_files/ugd/0379c5_f2cd715b6af244a28db4dc87dd86bf94.pdf.

²⁶ For an extended discussion of 'pluralistic ignorance' and its role in collective action against corruption, see Hoffmann, L. K. and Patel, R. N. (2023), 'Petty bribery, pluralistic ignorance, and the collective action problem', *Data & Policy*, 5(e24), https://doi.org/10.1017/dap.2023.19.

²⁷ This means that although individuals may personally object to paying bribes, the perception that everyone else considers it normal or necessary compels them to engage in this behaviour. Rather than being an exception it becomes entrenched when the majority of people wish for change. Although there are numerous laws that prohibit bribery in Nigeria, entrenched norms of the behaviour promote and reward it.



Map. States surveyed by Chatham House SNAG project in 2023

For this research paper, SNAG researchers reviewed historical anti-corruption policymaking, drawing on years of research in Nigeria, along with interviews and meetings with stakeholders across the country's transparency and anti-corruption institutions. This was complemented by quantitative data from the project's fourth annual national household survey, conducted in 2023, which examined broader anti-corruption behaviours, social trust, and collective integrity. This macro-level approach assessed beliefs about the willingness of community members to engage in anti-corruption actions (such as holding elected officials accountable) and grassroots support for accountability. Additionally, the survey evaluated moral sensitivity, judgment, motivation, and character as indicators of collective integrity.²⁸

²⁸ These variables are adapted from the International Anticorruption Academy's think-in on possible ways of measuring integrity. See Zinnbauer, D. (2023), *Measuring Integrity For Better Tracking And Understanding Corruption?*, background note, Laxenburg: International Anti-Corruption Academy, March 2023, https://www.iaca.int/measuring-corruption/wp-content/uploads/2023/03/GPMC_Measuring_integrity_for_better_tracking_22032023_online.pdf. The values were initially intended for measuring organizational integrity and ethics and are derived from Anke Arnaud's 2010 work but have been used in various iterations. See Arnaud, A. (2010), 'Conceptualizing and measuring ethical work climate: Development and validation of the ethical climate index', *Business & Society*, 49(2), pp. 345–58, https://doi.org/10.1177/0007650310362865.

The survey covered 6,400 households in the federal states of Adamawa, Benue, Enugu, Kano,²⁹ Lagos, Rivers and Sokoto, as well as the Federal Capital Territory of Abuja (FCT-Abuja), providing data from urban and rural areas across Nigeria.³⁰ These states were chosen to represent a cross-section of Nigerian socio-economic, political and demographic conditions.

In seeking to understand individuals who are exceptions to corruption norms and might play important roles in (re)shaping social norms and expectations around corruption, the SNAG project explored the concept of 'integrity role models' – individuals who actively resist corruption and demonstrate integrity through their own actions. Recognizing the significant role these individuals play in what is known as 'meta-nudging', ³¹ the indirect nudging of others, this research attempted to identify how they challenged corruption norms, fostered positive change and navigated the risks associated with defying entrenched patterns and rules of corruption. ³²

For this paper, SNAG researchers conducted semi-structured interviews in March 2023 and October 2024 with a carefully selected group of 21 integrity role models.³³ These 21 reformers were and had been involved in promoting or implementing changes to systems, policies and practices and improving efficiency and service delivery across government, civil society, media, academia, business and other sectors.

A common characteristic shared by these individuals was personal integrity, demonstrated by their record of implementing reforms and resisting corruption norms. The interview cohort represented diverse ethnic, religious, and professional backgrounds, degrees of decision-making power, network influence and membership. The profiles, experiences and actions of these reformers were analysed for common patterns and themes, triangulated through further literature review, and synthesized into implications for future policy formulation.

²⁹ The SNAG project was extended to Kano state in 2021, and that state was included in the national household survey from 2023.

³⁰ A total of 22,600 households have been surveyed across the entire project since 2016. Each round of survey implementation has been carried out in partnership with Nigerian universities and research centres. Experienced enumerators were recruited to the survey implementation teams and used their affiliation to the study during the administration of the survey. Enumerators were trained to dispel any perception that the survey data would be tracked by any government body to avoid response bias. See the SNAG website page for the full list of project partners: https://www.chathamhouse.org/about-us/our-departments/africa-programme/social-norms-and-accountable-governance-snag.

³¹ Behavioural scientists such as Eugen Dimant and Shaul Shalvi have proposed that intervention success in areas such as dishonesty can be enhanced 'by changing the behaviour of those who have the ability to enforce other's behaviour and norm adherence' in favour of honesty. See Dimant, E. and Shalvi, S. (2022), 'Meta-nudging honesty: Past, present, and future of the research frontier', *Current Opinion in Psychology*, 47(2022.101426), https://doi.org/10.1016/j.copsyc.2022.101426; Dimant, E. (2022), 'Putting collective momentum into behaviour change', *Psychology Today*, 4 August 2022, https://www.psychologytoday.com/intl/blog/norms-and-behavior-change/202208/putting-collective-momentum-behavior-change.

³² Examples of corruption opportunities shared by each of the integrity role models and the strategies they employed to counteract inducement demonstrated their norm deviance. The majority also described how their actions influenced others. However, it was beyond the scope of the research to analyse network effects.

³³ The sampling strategy relied on non-probability or a convenience sample of accessible actors who have been nominated by anti-corruption practitioners for exhibiting an observable track record for avoiding corruption and acting with integrity in their various workplaces. The SNAG team also received nominations and referrals from non-governmental organizations and some of the interview candidates. Seven of the 21 interviewees emerged through the national public participation campaign organized annually by Accountability Lab Nigeria aimed at naming and 'faming' honest government officials. Since 2017, Accountability Lab Nigeria has developed a methodology wherein communities are encouraged to identify government officials who uphold values of accountability and integrity in the discharge of their duties. The individuals identified are put through a vetting process which includes an external panel of judges who select five winners. Members of the public are then given the opportunity to vote for an 'Integrity Icon' from among the top five who emerge. See, for example, Adams, S. (2019), 'Integrity Icon Nigeria 2019 – top five selected', news article, Accountability Lab Nigeria, 1 July 2019, https://accountabilitylab.org/integrity-icon-nigeria-top-five-selected. As a starting point for interviews, a total of 21 people were selected from a nomination list provided by Accountability Lab Nigeria. An additional 21 individuals were nominated by contacted non-governmental organizations and other partners.

About this paper

The following chapter of this paper outlines how top—down efforts at reform since the end of military rule have produced uneven results. Chapter 3 then goes on to show – citing data from the fourth annual household survey – the trust gap of key institutions; the social apathy among Nigeria's population at the entrenched nature of corruption; and conversely, how this pervasive sentiment can be harnessed to effect lasting change in social norms and behaviour. Chapter 4 then explores the potential of 'integrity role models' and networked coalitions in promoting this change, before Chapter 5 provides recommendations on how they can be empowered, supported and connected both to each other and to the wider anti-corruption movement in Nigeria.

25 years of anti-corruption reforms in Nigeria

Since the end of military rule, numerous anti-corruption reforms have been attempted but have yielded uneven results.

Addressing corruption and impunity was a prominent demand from Nigerians after the end of military rule in 1999. The country's first civilian president, Olusegun Obasanjo, made anti-corruption a priority and duly enacted The Corrupt Practices and Other Related Offences Act as his first legislative bill, signing it into law in June 2000. This bill led to the establishment of the Independent Corrupt Practices and Other Related Offences Commission (ICPC) in 2001,³⁴ joined in 2003³⁵ by the Economic and Financial Crimes Commission (EFCC). Obasanjo retired military officers who had occupied political positions, reviewed projects initiated by previous military regimes and inaugurated inquiries into various public institutions. His administration also pursued broader public sector reforms aimed at curtailing monopolies through accelerated privatization and deregulation of public enterprises,³⁶ asset recovery and transparency in public revenue collection and expenditure.

³⁴ Nigeria has a longer history of anti-corruption legislation, dating back to the Corrupt Practices Decree (No. 38) enacted under the military regime of Murtala Mohammed in 1975, which established the Corrupt Practices Investigation Bureau – later succeeded by the Code of Conduct Bureau when the 1975 Act was replaced by the Code of Conduct Act of 1979.

³⁵ Nigeria also signed the United Nations Convention Against Corruption (UNCAC) in December 2003 and the Senate ratified it a year later.

³⁶ The privatization of state assets by the Obasanjo administration was criticized by some for a lack of transparency in the selection of buyers, undervaluation of assets and conflicts of interests among officials in the administration. See Enweremadu, D. U. (2012), Anti-corruption campaign in Nigeria (1999-2007): The politics of a failed reform, IFRA-Nigeria, https://doi.org/10.4000/books.ifra.1588. However, the privatization of Nigerian Telecommunications Limited (NITEL) transformed the telecommunications sector by eliminating monopoly and boosting socio-economic development in the country. Pension reforms from the same period had a similar effect.

But while Obasanjo is recognized as having laid the foundations for important economic, governance and political reforms, 37 the effectiveness of these measures was hampered by a multitude of factors, including fluctuating political will, insufficient funding, a lack of personnel, legal loopholes, 38 operational constraints, and Nigeria's slow and inefficient judicial system. The political class at the subnational level also pushed back against Obasanjo's reforms, claiming that the rights of Nigeria's autonomous federal states were being infringed.³⁹ These challenges came alongside concerns that Obasanjo's anti-corruption campaign had been politicized by those implementing the reforms, with key instruments like the EFCC being accused of 'political selectivity in its operations'. 40 This situation rapidly descended into a crisis of legitimacy for the president, which culminated with an unsuccessful attempt to amend the constitution to pursue a third term in office.

During their initial years under Obasanjo, Nigeria's key anti-corruption leaders and institutions garnered substantial public support for their dynamism and efficiency. However, they experienced a decline in reputation as their efforts were influenced and ultimately limited by a political system that is fundamentally designed to reward rather than punish corrupt practices. The EFCC concentrated its efforts on high-profile corruption cases involving prominent political figures and other financial crimes like advanced fee fraud, 41 while the ICPC42 and the older Code of Conduct Bureau, despite having statutory powers that exceeded those of the EFCC on paper, largely refrained from taking a similar 'big fish' approach. 43 Significantly, the EFCC's arrest of James Ibori in December 2007 put in motion money-laundering cases against him domestically and then in the UK.44

³⁷ Notably during his second term, Obasanjo appointed several individuals recognized as 'reformers' to lead key institutions in his administration. Among them were: Dora Akinyuli, who headed the National Agency for Food and Drug Administration and Control (NAFDAC); Obi Ezekwesili, who led the Budget and Price Monitoring Intelligence Unit (BPMIU); Ngozi Okonjo-Iweala, who served as finance minister and was instrumental in guiding Obasanjo's economic reform team until 2006; Nasir El-Rufai, who directed the Bureau of Public Enterprises (BPE); and Charles Soludo, who began as chief economic adviser to the president before becoming governor of the Central Bank of Nigeria. Akunyili has been recognized both domestically and internationally for pursuing some of the most far-reaching reforms in pharmaceutical regulations, food safety, cosmetic quality control and public health in Nigeria's history. See Harding, A. (2006), 'Dora Akunyili: Scourge of Nigerian drug counterfeits', The Lancet, 367(9521), p. 1479, https://www.thelancet.com/action/showCitFormats?doi=10.1016%2FS0140-6736%2806%2968634-0&pii=S0140-6736%2806%2968634-0.

³⁸ The ICPC faced a significant limitation in that it was legally prohibited from investigating corruption incidents that occurred prior to the law's passage. This restriction disappointed public expectations that corrupt military officials and their associates would be held accountable after its creation.

³⁹ Immediately after the ICPC law was enacted, 32 of Nigeria's 36 state governments filed a challenge with the supreme court, aiming to declare the legislation unconstitutional.

⁴⁰ Human Rights Watch (2011), Corruption on Trial?: The record of Nigeria's Economic and Financial Crimes Commission, report, New York: Human Rights Watch, p. 10, https://www.hrw.org/report/2011/08/25/ corruption-trial/record-nigerias-economic-and-financial-crimes-commission.

⁴¹ Advance fee fraud, commonly referred to as '419' in Nigeria, involves demanding and paying an advance fee such as for tax, brokerage, or bribes - with the false promise that it is necessary to finalize a business deal, regardless of the deal's legitimacy. The term '419' originates from Section 419 of the Nigerian Criminal Code, which addressed this crime prior to the implementation of the Advance Fee Fraud Decree No. 13 in 1995. The latter was repealed and replaced in 2005, and again in 2007 with the current Advance Fee Fraud and Other Fraud Related Offences Act. 42 For instance, the ICPC possesses broader powers than the EFCC to seize the assets of public officials accused of corruption and to demand the production of financial information. See ICPC Act, sec. 45-48; EFCC Act, sec. 25 and

^{26.} Additionally, the ICPC can require public officials to justify how they obtained property deemed 'excessive' in relation to their salaries, a power that is not mirrored in the EFCC Act. See ICPC Act, sec. 44(2).

⁴³ The EFCC can however investigate a person whose lifestyle and property it thinksare 'not justified by his source of income.' See EFCC Act, sec. 7(1)(b).

⁴⁴ The chair of the EFCC, Nuhu Ribadu, was sacked two weeks after the commission charged Ibori. A key Ribadu-era official is reported by Human Rights Watch to have confessed in an interview that they had not anticipated this reaction: 'Either we did not read the mind of the president [Obasanjo] very well or we were naïve'. See Human Rights Watch (2011), Corruption on Trial?, p. 12.

In 2007, Obasanjo was succeeded as president by Umaru Yar'Adua, who made contributions toward anti-corruption reform. These included continuing the prosecution of high-profile cases and establishing the Electoral Reform Committee (ERC). This committee united a range of stakeholders – including civil society, opposition parties, development partners and the diplomatic community – around the issue of electoral corruption. Pressure from civic coalitions such as the Transition Monitoring Group led to important electoral reforms, including the passage of the Electoral Acts of 2010 and 2022, as well as innovations in electoral processes in 2011 and 2015.

Under Jonathan's administration, the Freedom of Information Act was finally passed in 2011, after a decade of advocacy by the Freedom of Information Coalition, which comprised more than 150 organizations.

Following Yar'Adua's death in 2010, his deputy, Goodluck Jonathan, was sworn in as president and went on to win the 2011 elections. ⁴⁵ Under Jonathan's administration, the Freedom of Information Act (FOIA) was finally passed in 2011, after a decade of advocacy by the Freedom of Information Coalition, which comprised more than 150 organizations. ⁴⁶ This collective effort by civil society and supportive lawmakers underscored the capacity of Nigerian civil society organizations and activists to establish and maintain an agenda in public discourse. It also illustrates that institutional reforms often depend on sustained, cross-cutting pressure and the presence of supportive individuals within the government.

Muhammadu Buhari of the All Progressives Congress defeated Jonathan at the 2015 presidential election, after a campaign primarily focused on anti-corruption. The mixed results of Jonathan's anti-corruption efforts and the widespread public perception that government corruption had in fact worsened in the years leading up to the election both contributed to his loss. In his campaign, Buhari vowed to address the interconnected challenges of corruption, terrorism and economic disparity.

⁴⁵ Yar'Adua's ill-health was concealed and his absence from Nigeria for treatment abroad triggered a constitutional crisis due to his failure to transfer presidential powers to his deputy. Citizen-led protests and activism in response to this crisis led to the establishment of civil society organizations such as Enough is Enough Nigeria. See EiE Nigeria (undated), 'About', https://eie.ng/about.

⁴⁶ For a more detailed discussion of the civic activism which led to the passage of FOIA, see Itodo, S. and O'Regan, D. (2018), *Nigeria's Movement for Transparency and Accountability: Bringing the Pieces Together*, special report, Washington, DC: United States Institute of Peace, https://www.usip.org/publications/2018/10/nigerias-movement-transparency-and-accountability.

⁴⁷ Buhari's successful campaign ended the People's Democratic Party's 16-year dominance of the presidency. In addition, until 2015, at no election since the 1998 election had corruption been a central theme. Rotimi Suberu noted Buhari's electoral manifesto contained 13 anti-corruption pledges, including establishing whistleblower protection legislation, exemplary ethical conduct (specifically the public declaration of assets); transparency and accountability enforcement; cost of governance reduction in all ministries, departments and agencies (MDAs); increased institutional autonomy for anti-corruption agencies; and a coherent national anticorruption strategy. See Suberu, R.T. (2018), 'Strategies for Advancing Anticorruption Reform in Nigeria', *Daedalus, the Journal of the American Academy of Arts & Sciences*, 147(3), p. 185, https://doi.org/10.1162/daed_a_00510.

Once in office, Buhari's anti-corruption reform efforts included, among others,⁴⁸ technocratic interventions in public financial control,⁴⁹ a whistleblower policy, establishing a Presidential Advisory Committee Against Corruption,⁵⁰ the Open Government Partnership commitment⁵¹ and significant examples of stolen assets being recovered by Nigeria's anti-corruption agencies.⁵²

However, these efforts were again severely undermined by the sustained politicization of this campaign, with key agencies such as the EFCC continuing to be perceived as partisan and the country's graft-driven party politics having caustic effects on public perception. Politicians who defected to the ruling party ensured their misdeeds were overlooked, while those who aligned with the opposition risked increased scrutiny from anti-corruption agencies. Additionally, the Buhari administration failed to institutionalize some of its key accountability measures, such as asset declaration for public officials, ⁵³ the whistleblower policy ⁵⁴ and the fiscal sustainability plan. ⁵⁵ As a result, Nigeria's anti-corruption reform trajectory remained inconsistent. ⁵⁶

While Buhari's willingness to reference corruption and push forward reforms like the whistleblower policy encouraged many Nigerians to engage with the anti-corruption fight, ⁵⁷ his administration's inability to fully embed this agenda into Nigeria's politics ultimately further entrenched the common belief that the country's political system is rigged against the public's interests. Furthermore, Nigeria experienced recessions during both terms of Buhari's presidency, including double-digit inflation, record unemployment, a heaving debt burden and an increase in violent conflict. The Buhari government's inflexible implementation of foreign exchange controls also opened

⁴⁸ Other notable reform efforts included the Presidential Initiative on Continuous Audit, which removed more than 53,000 ghost workers from MDA payrolls; a new budget portal based on international public sector accounting standards; and a fiscal sustainability plan.

⁴⁹ These included the Treasury Single Account, Biometric Verification Number and Integrated Personnel and Payroll Information System.

⁵⁰ PACAC was set up to advise the presidency on criminal justice reform and asset recovery.

⁵¹ The Open Government Partnership (OGP) commitment consists of pledges made by participating countries to foster transparency, empower citizens, combat corruption, and leverage new technologies to enhance governance. Established in 2011, OGP facilitates agreed benchmarks for governments to implement specific, actionable measures for open governance through collaborative processes involving civil society organizations and citizens. Nigeria became an OGP member in 2016. See Open Government Partnership (undated), 'Nigeria', https://www.opengovpartnership.org/members/nigeria.

⁵² Transnational asset recovery was aided by working closely with the UK, the US and various Middle Eastern countries to seize and repatriate assets purchased by public officials with illicit funds. According to Transparency International, anti-corruption investigations led to the recovery of \$10 billion in looted cash and assets. However, the absence of comprehensive, publicly accessible and verifiable data regarding the total amount of assets recovered, their sources and locations undermined the asset recovery effort by failing to enhance and sustain public trust. Transparency International (2016), 'Nigeria must strengthen anti-corruption bodies and increase transparency on asset recovery', press release, 16 June 2016, https://www.transparency.org/en/press/nigerian-must-strenghthen-anti-corruption-bodies-and-increase-transparency.

⁵³ President Buhari and his vice-president, Yemi Osinbajo, partially declared their own assets after taking office. However, cabinet and other political appointments were not conditioned on asset declaration and none of the cabinet ministers followed the president's example.

⁵⁴ The Whistleblower Protection Bill has been considered, reviewed and discussed in the National Assembly since 2016.

⁵⁵ In 2016, the Buhari administration introduced a 22-point fiscal sustainability plan aimed at promoting fiscal responsibility and transparency in public spending for the 36 states and 774 local governments. All state governments were expected to adhere to the plan's strategic goals, which centred on five key components: accountability and transparency; increasing public revenue; streamlining public expenditure; reforming public financial management; and ensuring sustainable debt management. The overarching aim of the plan was to guide states toward achieving fiscal sustainability. See World Bank (2017), *Nigeria Biannual Economic Update: The case for sustaining fiscal reform*, October 2017, https://documents1.worldbank.org/curated/ar/277951510594783976/pdf/121301-REVISED-Nigeria-Biannual-Economic-Update-October-2017-F.pdf.

⁵⁶ Suberu (2018), 'Strategies for Advancing Anticorruption Reform in Nigeria'.

⁵⁷ Tade, O. (2019), 'Policing Looted Funds with the Whistle: Newspaper Coverage of the Anti-corruption Crusade in Nigeria', *Africa Development*, 44(4), pp. 73–90, https://www.jstor.org/stable/26873445.

new opportunities for rent-seeking and corruption, while the country's corruption and governance rankings deteriorated during Buhari's time in office.⁵⁸

Unlike Buhari, current president Bola Ahmed Tinubu did not emphasize corruption as a central theme in his successful 2023 presidential campaign, instead prioritizing Nigeria macroeconomic stability and growth. ⁵⁹ But although there is a compelling argument for radical economic reforms in Nigeria, the Tinubu government's approach to fuel-subsidy removal and exchange-rate harmonization, for a country that lacks a robust and reliable social security system, ⁶⁰ triggered a cost-of-living crisis as household incomes and purchasing power were diminished. ⁶¹ These harsh economic conditions sparked nationwide protests in the second half of 2024. Under the campaign slogan #EndBadGovernanceinNigeria, the protest movement has focused on issues of mismanagement, soaring food inflation – which reached 39.2 per cent in October 2024 – ⁶² and rising fuel prices, which tripled immediately after Tinubu introduced his reforms on assuming office. ⁶³

Nigeria's macroeconomic reforms and stability would be made more effective if coupled with a robust commitment to greater transparency, efficiency and accountability of governing institutions. In a speech delivered by vice-president Kashim Shettima, at the 6th annual general assembly of the Network of Anti-Corruption Institutions in West Africa (NACIWA), Tinubu acknowledged the detrimental impact of corruption. While the president expressed support for Nigeria's anti-corruption bodies through non-interference, adequate funding and providing a building for NACIWA's headquarters in Abuja, his speech lacked updates on measurable progress and did not detail comprehensive action-oriented commitments or specific institutions needing reform.

⁵⁸ Nigeria's position in Transparency International's Corruption Perception Index has fluctuated within the lower tier over the years. In 2016, the country was ranked 136 out of 176 countries assessed. However, by the end of 2019, just months into President Buhari's second term, Nigeria's ranking fell to 146, and it dropped further to 149 in 2020. In 2022, Nigeria ranked 150, but improved slightly to 145 by the end of Buhari's second term in 2023. In response to the 2020 decline from 146 to 149, the Buhari administration described the ranking as 'senseless and baseless' Premium Times (2021), 'Presidency attacks Transparency International over Nigeria's poor corruption rating', 28 January 2021, https://www.premiumtimesng.com/news/headlines/439283-presidency-attacks-transparency-international-over-nigerias-poor-corruption-rating.html?tztc=1.

⁵⁹ Tinubu has put forward an executive bill on tax reform, and has promised to revive the whistleblower bill and look into other aspects of constitutional reform.

⁶⁰ International Labour Organisation Social Protection (undated), 'Nigeria', https://www.social-protection.org/gimi/ShowCountryProfile.action?iso=NG.

⁶¹ Oyadeyi, O. et al. (2024), 'The Cost of Living Crisis in Nigeria: The Impact of Food and Commodity Prices on Household Purchasing Power and their Implications for Economic Wellbeing'. https://dx.doi.org/10.2139/ssrn.4866006; Achirga, A. and Sanni, S. (2024), 'Hard times in Nigeria as reforms deepen cost of living crisis', Reuters, 11 March 2024, https://www.reuters.com/world/africa/hard-times-nigeria-reforms-deepen-cost-living-crisis-2024-03-11.

⁶² According to a National Bureau of Statistics report, almost two out of three (65.8 per cent) Nigerian households skip at least one meal a day because they cannot afford enough food. The number of households in Nigeria going hungry due to food affordability doubled to 62.4 per cent in 2023 from 37 per cent in 2019. It was also reported that in 12.3 per cent of households, at least one person does not eat for a whole day. See National Bureau of Statistics (2024), 'Nigeria General Household Survey – Panel (GHS-Panel) Wave 5 (2023/2024)', https://www.nigerianstat.gov.ng/elibrary/read/1241588.

⁶³ Between October and December 2024, approximately 25.1 million Nigerians were thought to be facing acute food insecurity. Furthermore, a recent assessment by the World Food Programme has cautioned that this number could escalate to 33 million in 2025. See World Food Programme (2024), 'Economic hardship, the climate crisis and violence in the northeast projected to push 33.1 million Nigerians into food insecurity in 2025', press release, 8 November 2024, https://www.wfp.org/news/economic-hardship-climate-crisis-and-violence-northeast-projected-push-331-million-nigerians#:~:text=ABUJA%20%E2%80%93%20A%20new%20assessment%20 has,need%20projected%20to%20almost%20double.

⁶⁴ In his address, Tinubu urged West African leaders to tackle the issue of corruption with determination and collective action. He emphasized the need for countries in the region to strengthen their anti-corruption initiatives, pointing out that corruption undermines the very foundations of society, erodes public trust and hinders fair distribution of resources. See EFCC (2024), 'Tinubu Seeks Stronger Anti-Corruption Structures and Regime in West Africa to Tackle Graft', press release, 19 August 2024, https://www.efcc.gov.ng/efcc/news-and-information/news-release/10321-tinubu-seeks-stronger-anti-corruption-structures-and-regime-in-west-africa-to-tackle-graft.

A crisis of trust: Results from the fourth national household survey

Nigeria is faced with a fundamental question of how to reduce the cost of being honest in an environment where trust in formal institutions has been eroded.

The past 25 years of anti-corruption reform in Nigeria has been marked by notable milestones, yet the overall trajectory remains inconsistent and has often been hindered by partisan campaigns, insufficient institutionalization and unequal accountability. These weaknesses have led to political clientelism and impunity, undermining meaningful policy implementation and stronger accountability mechanisms. Corrupt practices, such as the diversion of already scarce government revenues, have also weakened the national economy over time, pushed up the cost of living and compounded insecurity through the erosion of institutional integrity.

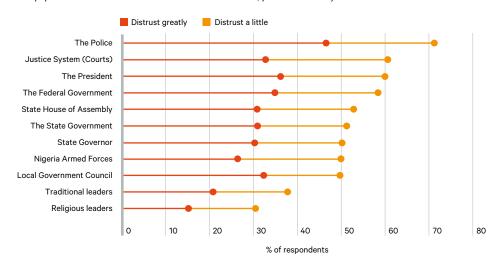
These deficits have had a corrosive effect on public trust in governing institutions (referring to the belief that an institution or its representatives will act consistently with expectations of their positive behaviour).⁶⁵ Furthermore,

the disconnection between Nigeria's formal anti-corruption frameworks⁶⁶ and the actual malfunctioning of government erodes public faith in the Nigerian state and its representatives, and has driven successive crises of legitimacy and trust.

The crisis in public trust is highlighted by the findings of the fourth and most recent iteration of Chatham House SNAG project's national household survey, implemented in partnership with Nigeria's National Bureau of Statistics (NBS). Responses to the 2023 survey show significant levels of dissatisfaction with political leadership in Nigeria. As part of the survey, respondents were asked to indicate their level of trust in various institutions. Of all those mentioned, the police were by far the most greatly distrusted, with 46 per cent of people responding that they distrust the police 'greatly'. Only seven per cent of respondents stated that they had great trust in the police. ⁶⁷

Figure 1. Nigerians have low levels of trust in national and state-level institutions





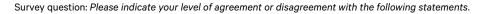
66 In principle, Nigeria has numerous anti-corruption frameworks and institutions. These include: the Code of Conduct Bureau; the Recovery of Public Property Act 1984; the Miscellaneous Offences Act 1984; the Bank and Other Financial Institutions Act 1991; the Failed Banks (Recovery of Debts) Act 1994; the Nigeria Deposit Insurance Corporation Act 1998; the Independent Corrupt Practices and Other Related Offences Commission Act 2000; the Economic and Financial Crimes Commission Act 2004: the Advance Fee Fraud and Other Related Offences Act 2006: the Monitoring of Revenue Allocation to Local Government Act 2006; the Money Laundering Act 2007; the Public Procurement Act 2007; Nigerian Extractive Industries Transparency Initiative 2007; and the Administration of Criminal Justice Act of 2015. The adoption of a National Anti-Corruption Strategy (2017-21 and 2022-26) by the Federal Executive Council and the National Ethics and Integrity Policy in 2020 are further examples of anti-corruption policy formulation. For an overview and assessment of other legal frameworks and anti-corruption bodies, see Yakubu, U., Ochube, G. A. and Eze, O. E. (2024), Civil Society Report on the implementation of Chapter II (Prevention) & Chapter V (Asset Recovery) of the United Nations Convention Against Corruption in Nigeria, Center for Fiscal Transparency and Public Integrity, 13 December 2024, https://uncaccoalition.org/wp-content/uploads/Updated-Civil-Society-Parallel-Report-on-UNCAC-implementation-in-Nigeria-CeFTPI-UNCAC-Coalition-20-December-2024.pdf. 67 In a 'vignette' study, which was part of the survey, a majority of respondents (over 50 per cent across all scenarios) indicated that it is 'extremely unlikely' or 'unlikely' for a police officer to hold a colleague accountable for accepting a bribe by reporting them. In a scenario in which corruption were widely disapproved of within a unit, a slim majority (52.3 per cent) of respondents thought that it was likely ('moderately likely' or 'likely') to be reported. Conversely, if most officers in a unit felt acceptance of bribery to be acceptable, the expectation that a report would be likely fell to 45 per cent. That there is only a 7.8 percentage point difference in the results between these scenarios indicates that there is a deep-rooted expectation of corrupt behaviour within the police, and a pessimism that cultural change (for instance, encouraging disapproval of corrupt behaviour on the part of police officers) would have real-world impacts. Any intervention in police bribery would have to consider that a significant proportion of respondents believe corruption is accepted and normalized among the police. Additionally, the majority of Nigerians do not believe that a police officer would report a colleague for accepting a bribe, even if the behaviour were well known and widely disapproved of by his fellow officers.

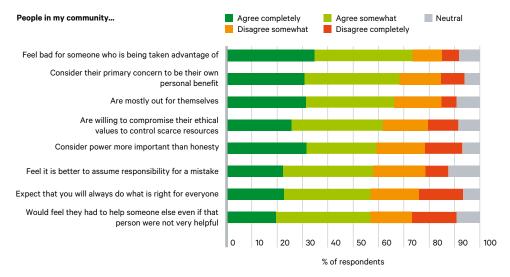
The president⁶⁸ and federal government ranked second- and third-least trusted by the Nigerian public, with 36 and 35 per cent respectively stating that they distrusted those institutions 'greatly'. Other formal institutions and leaders – including the judiciary, local government councils and state-level politicians and bodies – are also widely distrusted by the public that they are appointed and elected to serve. (See Figure 1.)

Given the Nigerian government's ongoing efforts to reform the tax system and enhance domestic revenue, insights into public trust are particularly significant. Research and policymakers have often concentrated on law-based tax compliance. However, there is a growing recognition of the importance of voluntary compliance, driven by informal norms and beliefs that motivate taxpayers, especially trust. ⁶⁹ This is crucial for countries like Nigeria, where tax enforcement capacity is limited. Consequently, the current technocratic approach may not effectively tackle tax evasion unless there is a sustained investment in building trust with taxpayers. Therefore, a key component of Nigeria's tax reform initiative should involve a norms-inspired strategy that not only demonstrates how tax revenue translates into public services and broader benefits for taxpayers, but also emphasizes the reciprocal relationship – highlighting both who pays taxes and what taxpayers receive in return.

Alongside these findings on public trust, the survey also shows that Nigeria's corruption landscape is characterized by ambivalent and conflicting beliefs and values. Respondents were asked to agree or disagree with a set of statements aimed at understanding the extent of self-interest vs collective well-being values in their communities. (See Figure 2.)

Figure 2. Nigerians have low expectations of honesty in society at large, but acknowledge a shared desire for fairness among fellow citizens





⁶⁸ The survey was conducted in August 2023, two months after President Tinubu's inauguration. Respondents' low trust in the president and federal government likely reflect his mandate and legitimacy challenges having won the presidential elections with just 36.6 per cent of the valid votes cast.

⁶⁹ Fjeldstad, O.-H. and Sjursen, I. H. (2024), 'The role of trust and norms in tax compliance in Africa', in United Nations Development Programme (2024), *Breaking the gridlock: Reimagining cooperation in a polarized world (Human Development Report 2023/2024*), New York: UNDP, pp. 135–41, https://hdr.undp.org/system/files/documents/global-report-document/hdr2023-24chapter4en.pdf.

59.2 per cent of survey respondents believed ('agree somewhat' or 'agree completely') that power was more important than honesty in their community, and 61.5 per cent believed that others in the community would be willing to compromise their ethical values for control of scarce resources. Many individuals see their communities and Nigerian society at large as places where honesty and integrity are valued less than power and the control of resources, and an environment in which compromising one's values is tolerated and deemed acceptable or even essential.

These self-interested values are reflected in Nigerian public life. Many powerful individuals know citizens want better governance and a fairer society, and rhetorically embrace good governance, ethical leadership, and self-sacrifice. Indeed, they gain much of their status from participation in civic life, including involvement in religious, ethnic, or professional communities, the justice system and the media. But corruption continues unimpeded. For many Nigerians, fraud reports reinforce the perception that corruption is both ubiquitous and inevitable, inspiring little confidence that those responsible will be held accountable.

Survey findings suggest that cultural norms of empathy and social responsibility are resilient in Nigeria, and that there is a shared desire among Nigerians for fair treatment.

Yet public opinion regarding personal and institutional conduct still matters in Nigeria. In some instances, public criticism has been effective in forcing contrition or a reversal of abusive official conduct. Significantly, the survey findings suggest that cultural norms of empathy and social responsibility are resilient in Nigeria, and that there is a shared desire among Nigerians for fair treatment. While as many as 68.3 per cent of respondents agreed that most people's 'primary concern was their own personal benefit' (suggesting a belief that many individuals prioritize personal advancement over the community's welfare), 73.4 per cent respondents agreed that most people in their community 'feel bad when someone is being taken advantage of'.

These conflicting views demonstrate the complicated and ambivalent relationship most Nigerians have with corrupt practices. Many recognize corruption as a real problem but feel resigned to its prevalence. At the same time, its persistence creates room for justification of corrupt practices, public apathy and scepticism about the effectiveness of anti-corruption measures. With widespread corruption, people tend to doubt the sincerity or potential success of government reforms

⁷⁰ For example, the government's reaction to protests such as the #EndSARS protests of October 2020 and its anxieties towards the #EndBadGovernance protests of August 2024. Communication and reaction from government spokespeople to online/public criticism also suggests some sensitivity and anxiety over public shaming. The decision to dismiss charges against underage protesters following public outrage is also an example of government responsiveness to public criticism. See Obiezu, T. (2024), 'Nigeria president orders release of underage protesters following outrage', Voice of America News, 5 November 2024, https://www.voanews.com/a/nigerian-president-orders-release-of-underage-protesters-following-outrage-/7851818.html.

⁷¹ While many respondents agreed that most people's 'primary concern was their own personal benefit' (suggesting a belief that many individuals prioritize getting ahead personally over the community's welfare), slightly more respondents agreed that most people in their community 'feel bad when someone is being taken advantage of'.

and initiatives. Yet these views also indicate that Nigeria is at a critical juncture, facing a choice between the persistent deepening of corruption or the possibility of socially meaningful, joined-up reform.

The survey findings point to a disconnection between the public's aspirations and the reality of Nigeria's governance systems, and between engagement in corrupt practices and moral beliefs. These gaps offer a way to reframe anti-corruption reform efforts. Anti-corruption strategies can harness and amplify collective sentiments of civic duty, empathy, and the desire for fairness to mobilize citizens against the abuse of power. Better mobilization can build demand for greater accountability from leaders in their exercise of power and resource management.

While public ambivalence can serve as a starting point for collective action against corruption, it is not sustainable or effective alone. Other factors play a critical role in facilitating effective collective action, including material benefits or practical incentives, such as economic gains, social recognition, community identity, and strategic planning with clear goals and organized efforts. Additionally, external pressures, including political, economic, and social contexts – such as government regulations, policy changes and public sentiment – profoundly affect collective action.

Effective leadership and organizational structures are crucial for channelling group motivations, ensuring coordination and sustaining engagement.

Building on a legacy of successful coalition-building

In light of these findings, Nigeria is faced with a fundamental question of how to reduce the cost to government officials, businesspeople and ordinary citizens of being honest in an environment where trust in formal institutions has been eroded by decades of broken promises, impunity and failed reform, and the political system has been so compromised by entrenched corruption that top—down reform is superficial, resisted or blocked.

The answers to this question can be found in Nigeria. The first of these answers lies in the country's track record in building and sustaining successful civic coalitions. Coalition-building has proven successful in driving key sociopolitical changes in the past, most significantly the transition from military rule in 1999. The establishment of the Electoral Reform Committee in the late 2000s and the passing of the Freedom of Information Act in 2011 also came about through the sustained activism of coordinated groups of diverse stakeholders, including ordinary citizens, working together with large-scale civil society organizations such as the Transition Monitoring Group, the Nigeria Civil Society Situation Room and Freedom of Information Coalition. These movements managed to generate multi-dimensional pressure on political actors which led to real, if incremental, change.

While this level of long-term citizen engagement in advocacy efforts is often rare, successful mobilization in the above cases was the result of a combination of contextual factors. In the case of ending military rule, factors included political resistance and protests against oppressive events such as the annulment of the June 1993 elections and the execution of the environmental activist Ken Saro-Wiwa and

other Ogoni leaders in 1995.⁷² A series of other factors also helped create the opening for democratic transition, including activism among labour, professional and student associations against economic hardship and mismanagement under structural adjustment policies; the activities of pro-democracy groups; international pressure and sanctions; the role of independent and underground media (e.g. pirate radio stations such as Radio Kudirat); and, finally, the sudden deaths of the former military head of state (1985–93), General Sani Abacha, and Chief Moshood Abiola – widely believed to have won the 1993 presidential elections – in 1998. The combination of conditions – some deliberate and others incidental – collectively fuelled resistance and pro-democratic advocacy, eventually propelling Nigeria towards the end of military dictatorship.

Research shows that dynamic coalitions and civic resistance can create political will and empower civil society.

Research also shows that dynamic coalitions and civic resistance can create political will and empower civil society. 73 Groups that have previously mobilized are also shown to possess the organizational infrastructure, norms, interpersonal trust and experience that lowers the cost for future actions and these benefits from past mobilization can be extended across different organizations – having a catalytic effect.⁷⁴ In recent years, civic organizations that have drawn on the lessons from these coalition-building successes have led investigations, publicized corruption scandals, mobilized public awareness and proved successful in attracting and leveraging international resources and cooperation.⁷⁵ The efforts of organizations like the Civil Society Network Against Corruption, Socio-Economics Rights and Accountability Project (SERAP), BudgIT, EiE Nigeria, Agora Policy, Connected Development, as well as online media platforms like Premium Times, Dataphyte, the International Center for Investigative Reporting, the Foundation for Investigative Journalism and the Center for Fiscal Transparency and Public Integrity have contributed to expanding transparency advocacy in Nigeria. 76 Social norms and movement experts emphasize the powerful role of media as a tool for shaping public discourse and changing norms. Elites are aware of the media's influence in shaping narratives, leading to various attempts at censorship and control over Nigerian journalists and media assets, including radio stations, newspaper outlets and social media platforms.⁷⁷

⁷² The latter event in particular further galvanized domestic and international opposition to military rule.
73 See Johnston and Kpundeh (2002), *Building a Clean Machine*. This study underlines the importance of strategic incentives – material, purposive, specific and collective solidarity – to motivate participation in anti-corruption efforts. Combining these incentives effectively during the coalition's formation can enhance credibility and facilitate expansion. Different stages of coalition development require tailored incentives for participation and engagement. Additional insights on mobilizing broad anti-corruption coalitions can also be found in Chéne, M. (2010), *Mobilising broad anti-corruption coalitions*, Bergen: Chr. Michelsen Institute U4 Anti-Corruption Resource Centre, https://www.u4.no/publications/mobilising-broad-anti-corruption-coalitions.
74 Rowley, T. and Moldoveanu, M. (2003), 'When will stakeholder groups act?', *Academy of Management Review*, 28(2), pp. 204–19, https://doi.org/10.5465/amr.2003.9416080.

⁷⁵ Johnston and Kpundeh (2002), *Building a Clean Machine*. **76** For instance, Premium Times' reporting on the Panama Papers showed how collaboration can yield significant exposes of corruption by boosting reporting. The Panama Papers investigation led to more than 30 stories of secret

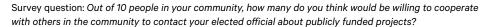
offshore assets owned by prominent Nigerians becoming public.

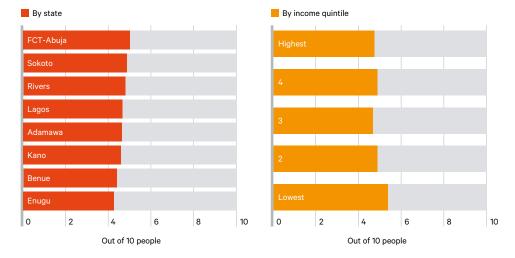
77 Nigeria is ranked 112th out of 180 countries in the most recent World Press Freedom Index by Reporters Without Borders. See Reporters Without Borders (2024), World Press Freedom Index Report, https://rsf.org/en/country/nigeria. Freedom House reports that internet freedom declined slightly in Nigeria between June 2023

Community cooperation

A second important asset in the fight against corruption in Nigeria is the untapped willingness at the grassroots level to cooperate for greater accountability. As the results of the fourth Chatham House household survey (and previous surveys) show, the potential exists within Nigerian communities to collaborate on demanding increased accountability from government. Survey questions explored the likelihood of respondents engaging in collective action against corruption – specifically, their willingness to cooperate with others in the community to contact an elected official about publicly funded projects. Almost half of respondents (4.85 out of 10) thought that members of their community would be willing to participate in community-based monitoring initiatives. (See Figure 3.)

Figure 3. Around half of Nigerians think that their community would take an active role in monitoring





The above finding is encouraging for initiatives at the subnational and local levels, and would appear to support efforts to mobilize public engagement in favour of national legislative reforms such as the Fiscal Responsibility Act Amendment Bill, which aims to eliminate revenue leakages, improve remittance procedures and enforce stricter accountability measures, and the Whistleblower Protection Act. 78

In terms of perceptions of how others feel about demanding accountability (despite the time, effort and resources required), Figure 4 shows that survey respondents thought that, on average, 4.91 out of 10 people in their community would consider it important and worthwhile. This finding supports the work of civil society leaders

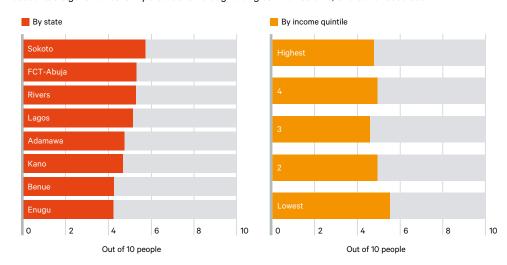
and May 2024. It evaluates Nigeria as partly free, highlighting the continued crackdowns on protesters, online activists and journalists who expose powerful individuals. See Freedom House (2024), Freedom on the Net 2024 Nigeria Report, https://freedomhouse.org/country/nigeria/freedom-net/2024. In April 2024, the Committee to Protect Journalists (CPJ) reported that the Nigerian police had launched an investigation of Nigeria's Foundation for Investigative Journalism following its reporting on alleged corruption involving officials of the Nigeria Customs Service. See CPJ (2024), 'Police investigate Nigeria's Foundation for Investigative Journalism after corruption coverage', press release, 16 April 2024, https://cpj.org/2024/04/police-investigate-nigerias-foundation-for-investigative-journalism-after-corruption-coverage.

⁷⁸ Higher expectations for cooperation among respondents from the lower income quintiles suggest opportunities to empower Nigeria's poorest citizens in anti-corruption efforts.

and organizations seeking to mobilize citizens to engage in service delivery monitoring, 79 such as BudgIT's 'Tracka' platform, 80 the '#myLG' project run by EiE Nigeria and Connected Development's 'Neighbourhood Watch' programme. These mobilization efforts will also be greatly enhanced by a local government resource allocation data portal under development by the Nigeria-based think-tank Agora Policy. 81

Figure 4. Almost half of Nigerians thought their community would consider accountability measures important

Survey question: Out of 10 people in your community, how many do you think would say that demanding accountable governance is important even though doing so involves time, effort and resources?



The evidence that nearly 50 per cent of people would participate in civic engagement is also significantly higher than the threshold shown by research conducted by Erica Chenoweth, which demonstrated that non-violent civil resistance is highly effective when 3.5 per cent of a country's population⁸² is actively and visibly involved. This level of engagement can help deepen political consciousness and strengthen coalition-building throughout society, enabling domestic pressure to function in a self-reinforcing manner.

But civil society coalitions and their attempts to leverage public willingness to collaborate on accountability have to date proved insufficient to change entrenched norms and behaviours around corruption – and should not be expected to do so on their own. All too often, such groups work in isolation and struggle to confront Nigeria's complex and diverse institutional, economic and political realities.

⁷⁹ Brazil's participatory budgeting processes is an example of how sharing governance information with communities is catalytic for deliberative platforms such as community councils and citizen assemblies. Such initiatives encourage a culture of collective responsibility for public resources.

⁸⁰ The BudgIT Foundation (undated), 'Service Delivery Tracking', https://budgit.org/our-focus/service-delivery-tracking.

⁸¹ Virtual interview with Waziri Adio, executive director of Agora Policy, 5 March 2025. Agora Policy's Local Governance Accountability (LGA) portal will have data on federal allocations to local councils from 1999 to date, details of LGA officials and key information on the local government area.

⁸² Estimates in 2023 put Nigeria's population at approximately 223 million. 3.5 per cent would therefore equate to approximately 7.8 million Nigerians. However, Chenoweth's data also reveals that the average peak participation in resistance movements has seldom reached the 3.5 per cent threshold since 2010. Therefore, galvanizing collective action requires the involvement of significant numbers across peer, community and social networks in strategic and sustained political activism and civil resistance to corruption. See Chenoweth, E. (2021), *Civil Resistance: What Everyone Needs to Know*, New York: Oxford University Press.

One potential way to extend and strengthen these efforts would be to include 'integrity role models'⁸³ from *within* public institutions, civil society, businesses and government at all levels. These are individuals who are taking active stands against corrupt behaviour, but who have not previously been systematically drawn into broader public anti-corruption campaigns.

Research on social norms highlights the importance of these individuals, as potential leaders who have confidence in their ability to alter these situations and the events that impact their lives. 84 Role models such as these challenge existing norms, drive change and motivate others to emulate their actions. 85 Their experiences, motives, successes and challenges to date can provide vital insight into building effective anti-corruption coalitions and creating a culture of accountability in Nigeria. The following chapter explains who these people are and the vital role they can play in combating corruption in Nigeria.

⁸³ There is a long list of descriptions for integrity role models. In this research, they have variously been profiled as integrity actors, corruption avoiders, corruption norm violators or anti-corruption reformers. In social norms literature, they are also referred to as 'early adopters', 'norm entrepreneurs' and 'social influencers'. In essence, these individuals are *change agents* who play a crucial role in inducing behavioural change away from entrenched collective behaviours like corruption. They are individuals who have specific psychological attributes ('low risk sensitivity, low risk perception, low allegiance to the standing norm, high autonomy, and high perceived self-efficacy' (Bicchieri, 2017:163)) and occupy specific positions within their communities. A body of literature that has studied the role such individuals play calls attention to the ways in which they organize groups towards collective action. For example, such individuals are often influential leaders who offer specific rewards or consequences to encourage people to work together (Olson, 1965); they explicitly specify how formal and informal rules work, acting on them in a public way to create shared understandings of appropriate conduct (Calvert, 1992); and they identify common goals that the group can work on (Schelling, 1980). Role models can be identified through social-network analysis. However, because of their influence, they are often widely known and recognized within a social network (Paluck, Shepherd and Aronow, 2016).

⁸⁴ Bicchieri, C. and Funcke, A. (2018), 'Norm Change: Trendsetters and Social Structure', *Social Research: An International Quarterly*, 85(1), pp. 1–21, https://dx.doi.org/10.1353/sor.2018.0002; Bandura, A. (1993), 'Perceived self-efficacy in cognitive development and functioning' *Educational Psychologist*, 28(2), pp. 117–48, https://doi.org/10.1207/s15326985ep2802_3.

⁸⁵ Bicchieri, C. (2017), *Norms in the wild: How to diagnose, measure and change social norms*, Oxford: Oxford University Press; Paluck, E. L., Shepherd, H. and Aronow, P. M. (2016), 'Changing climates of conflict: A social network experiment in 56 schools', *Proceedings of the National Academy of Sciences of the United States of America*, 113(3), pp. 566–71, https://doi.org/10.1073/pnas.1514483113.

'Integrity role models': Who they are and what they do

Integrity role models bear significant risks for standing up to corruption. But they have the potential to encourage others to challenge social norms and create greater public pressure for accountability.

Institutions are not self-enforcing, nor are reforms self-implementing. Human agency matters. In corrupted systems, credible, competent and influential individuals are crucial for both 'seeding' new norms and catalysing transformation. The abandonment of established norms and practices often comes with costs, particularly in scenarios marked by collective action problems, and requires people who are willing to take the lead and demonstrate to others that it is possible to adopt different practices. ⁸⁶ Such individuals bear the initial risks and costs of standing up against corrupt practices in order to bring about positive social change.

The negative consequences of standing against corrupt practices extend beyond foregoing the profit from unethical deals. Other, often more significant consequences include obligations to satisfy demands from family members, as well as more general social pressures to accumulate and display wealth to signify status. Individuals who

⁸⁶ Jackson, D. and Köbis, N. (2018), *Anti-corruption through a social norms lens*, Bergen: Chr. Michelsen Institute U4 Anti-Corruption Resource Centre, https://www.u4.no/publications/anti-corruption-through-a-social-norms-lens

reject these strong normative expectations can often face criticism from their families and society at large for not being as 'smart' as those who exploit their positions. They can even be labelled 'wicked', or seen as 'selfish', for depriving their families of financial security or for not 'carrying others along' by sharing the benefits of opportunities for self-enrichment through public office. ⁸⁷ For such individuals, the costs of avoiding corruption are significant, while the benefits can seem limited. Meanwhile, the risks of engaging in corruption are relatively low, due to weak accountability mechanisms, inconsistent enforcement of anti-corruption laws and the fact that many individuals – especially those in power – are seen to act with impunity.

The risks of engaging in corruption are relatively low, due to weak accountability mechanisms, inconsistent enforcement of anti-corruption laws and the fact that many individuals – especially those in power – are seen to act with impunity.

But typically, once these individuals engage in or express support for new practices, they create opportunities for others to adjust their beliefs and choose to emulate them. In this way, enough of these role models can potentially trigger a cascade or tipping effect that helps disrupt long-established corrupt practices. ⁸⁸ Conversely, when these new, non-corrupt practices are not credibly signalled, coordination and shifting ingrained norms among individuals and institutions becomes challenging – for instance, attempts to normalize adherence to rules contained in public procurement regulations, conflicts of interest policies and public disclosure of assets and income mandates. ⁸⁹

In such a context, the motivations and strategies⁹⁰ of these individuals who resist corruption can give valuable insights.⁹¹ Where there is a widespread empirical expectation of corruption by government officials – or a normative belief that corruption is just 'the price to pay' to get things done – individuals who actively

⁸⁷ For example, using one's position to award contracts to friends or sharing bribes with colleagues.

⁸⁸ Yet another body of literature has sought to explore the institutional contexts in which some individuals are successful at mobilizing collective action while others fail. The central theme of this work is that successful collective mobilization and change may depend on the presence of individuals with specific characteristics of psychological attributes working under certain institutional contexts in which they thrive. See, for example, Byman, D. and Pollack, K.M.M. (2001), 'Let Us Now Praise Great Men: Bringing the Statesman Back In', *International Security*, 25(4), pp. 107–46, https://muse.jhu.edu/article/14338; Greenstein, F. I. (1992), 'Can personality and politics be studied systematically?', *Political Psychology*, 13(1), pp. 105–28, https://doi.org/10.2307/3791427; Jervis, R. (2013), 'Do Leaders Matter and How Would We Know?', *Security Studies*, 22(2), pp. 153–79, https://doi.org/10.1080/09636412.2013.786909.

⁸⁹ This illustrates how corruption manifests as a collective action problem: individuals witness numerous others engaging in dishonest behaviours and recognize that acting honestly contradicts this norm, often at a higher cost. Although many individuals desire to live in a more honest society, they perceive it as unattainable due to prevailing norms and a perceived scarcity of like-minded individuals with whom they can act honestly.

⁹⁰ Particularly if there are any benefits to be had outside of the psychological feeling one might get from doing the right thing.

⁹¹ Behavioural change away from entrenched collective behaviours like systemic corruption often requires overcoming collective action problems at many institutional levels (Bates, 1988; Ostrom, 1990). Successful anti-corruption policy will require cooperation and coordination of individuals and organizations at various levels of formal and informal governance.

oppose these negative expectations can help us understand how to denormalize corruption and encourage citizens to engage with institutions in a way that creates greater public pressure for accountability.

Box 2. Who are the 'integrity role models'?

- Independent. Individuals who firmly oppose corruption and are confident in their ability to resist corrupt practices due to their belief in their own independent thinking.
- Undeterred. They are usually aware of the risks of challenging corruption, but remain undaunted by potential negative outcomes and may even downplay their own significance.
- Non-conforming. They are typically unaffected by pressures to conform to social
 expectations, whether descriptive or normative, and are often labelled (or might
 label themselves) as 'difficult' or 'stubborn' about protecting and asserting control
 over their decisions.
- Impact-oriented. They seek to bring about change that is beneficial for the common interests of others (for example, ensuring the safety of food, cosmetics or medicines).

Role models can be found in all sectors of society. From government officials who refuse to take bribes or bend the official rules, to private sector executives who refuse to give bribes to gain contracts, and ordinary citizens who demand transparency in public spending and participate in social audits. PRole models may also be individuals who bravely expose corrupt practices by blowing the whistle or conducting rigorous and transparent audits of financial transactions or public spending. Whatever area of society they are in, these individuals can play a critical role in influencing wider social beliefs about corruption and offer a starting point for building effective anti-corruption coalitions and a culture of integrity in Nigeria. Page 18.

For this paper, SNAG researchers interviewed 21 integrity role models across Nigeria's government, civil society, media, academia, business and other sectors to discover what motivates them. (See 'Methodology' section of Chapter 1 for more detail on how they were selected.) Despite the diverse backgrounds and roles of the interviewees, common motives could be identified, as well as shared challenges, strategies for success, costs suffered and impacts achieved.

⁹² Social audits are tools used by citizen groups, communities or organizations to monitor and evaluate the effectiveness and transparency of projects and services, often executed with public spending or through public-private partnerships. These include audits of public works (for example, roads and buildings), health services, social welfare programmes, environmental impact, community development projects and so on.

⁹³ In Iraq, which is similarly affected by politically sanctioned corruption and weak accountability systems, Renad Mansour contends that an accountability strategy which fosters 'connectivity-building' among reformers within the bureaucracy, legal professionals, and civil society members is likely to be successful. See Mansour, R. (2023), *Tackling Iraq's Unaccountable State*. Research Paper, London: Royal Institute of International Affairs, https://doi.org/10.55317/9781784135911.

What motivates Nigeria's integrity role models?

Studies show that intrinsic motivation and personal integrity play a significant role in decisions to stand against corruption. This was also reflected in the findings of SNAG's own research, with many of the interviewees citing strong personal values often stemming from early experiences with a role model parent or authority figure. Individuals described mothers who preached about the 'virtue of staying humble and always doing the right thing', father figures who emphasized the importance of 'being straightforward even when no one was watching', or parents who admonished their children 'to never cut corners and always be upright'. In addition, for most of those interviewed, their upbringing was shaped by strong religious values, with the majority describing their faith as both a strong motivation and source of courage.

Further, around half of those interviewed had witnessed the repercussions of a parent or guardian taking a stand against corruption in their professional life. One government reformer recounted a story about a father figure:

He often clashed with the regional heads of his organization, who pressured him to manipulate the figures in order to secure more funding. My father, however, was unwaveringly honest. I watched as these disputes unfolded, and it was clear that the regional heads resented him for refusing to inflate the numbers. He managed to withstand their pressure for a time, but ultimately, they succeeded in having his job contract revoked.

Numerous reformers shared similar experiences, expressing how their own commitments to upholding public trust, and their sense of duty to others – particularly to future generations – was shaped by the positive role models⁹⁶ they observed.⁹⁷

Interviewees demonstrated a capacity for self-governance and autonomous decision-making to refuse corrupt transactions. This independence of mind framed their choices and interactions, and enabled them to navigate complex ethical situations, with their independent moral beliefs in acting on principle winning out over social norms of passive acceptance or complicity. 98

⁹⁴ For example, see Cox, D., La Caze, M. and Levine, M. (2021), 'Integrity', in Zalta, E. (ed.) (2021), *The Stanford Encyclopedia of Philosophy* (Fall 2021 edition), Stanford, CA; Stanford University Press; and Zinnbauer (2023), *Measuring Integrity for Better Tracking and Understanding Corruption?*.

⁹⁵ Interview under the Chatham House Rule, March 2023.

⁹⁶ Some reformers also had professional role models who exemplified ethical behaviour and consistently adhered to the rules in the workplace.

⁹⁷ Interview under the Chatham House Rule, March 2023.

⁹⁸ Zhao et al. (2019) conducted a two-part study examining how perceived descriptive norms influence intentions to accept bribes and the psychological mechanisms involved. They found that such norms increased individuals' tendency to morally disengage, which slightly heightened their corrupt intentions. The study suggests that anti-corruption campaigns should focus on preventing moral disengagement and reshaping beliefs about others' behaviours to reduce bribe-taking. See Zhao, H., Zhang, H. and Xu, Y. (2019), 'Effects of perceived descriptive norms on corrupt intention: the mediating role of moral disengagement', *International Journal of Psychology*, 54(1), pp. 93–101, https://doi.org/10.1002/ijop.12401.

What methods do they use to fight corruption?

Integrity role models recognized the systemic nature of corruption in their environments, but identified opportunities to assert their integrity in a careful and strategic way. These could involve implementing gradual reforms, forging alliances with like-minded colleagues or finding innovative ways to achieve institutional changes without compromising their personal ethical standards.⁹⁹

Rather than outright rejecting corrupt practices, many adopted an approach best described as 'learning to pick your battles' – weighing the potential consequences of opposition to corrupt practices against their personal values and the broader implications for their organizations and communities. This strategy was particularly evident in their approach to complex ethical dilemmas¹⁰⁰ – for instance, when navigating Nigeria's highly influential norms around respectability and seniority, or cumbersome and inefficient regulations (known as 'banana peel rules' – administrative procedures designed to make officials slip up and coerce them to negotiate kickbacks rather than enhance efficiency).

Interviewees also commonly described being inflexible at the outset, but learning over time that they could use diplomacy to convey a message of zero tolerance for corruption. For instance, instead of a direct refusal, one government reformer explained that they would say:

'I would love to help but, unfortunately, it's not possible to do this.' So it's not as if I don't want to do it for you, but I'm diplomatically conveying my preference not to.

This softer approach had the effect of cushioning the rejection for the person making a corrupt demand. When facing a potentially harmful backlash for resisting corrupt requests, integrity role models may act naive to buy time and deflect pressure. For example, if a bribe-seeker communicates subtly (using coded phrasing like 'you should know how things are done around here' or 'try to see me properly'), suggesting that the role model should comply, the later might feign ignorance. This approach allows them to tactfully navigate deliberations and gently decline offers, as well as provide the other party a way to gracefully withdraw from the situation while preserving their dignity. Deflection tactics like these can increase the chances that procedural changes or reform efforts would advance before the bribe-seeker makes a direct corrupt request.

Integrity role models also demonstrated their ability to calculate and manage risk by making legally permissible alternative offers to 'contain' persistent and unavoidable requests for corrupt favours. For example, instead of offering 'no-bid' contracts or circumventing transparent hiring procedures to favour unqualified family members or friends, they might instead offer temporary jobs, training

⁹⁹ Reformers also adopted a strategic approach, as described by Mark Pyman and Paul M. Heywood, by redefining and breaking down corruption challenges into smaller, more manageable issues and then reframing these smaller problems into solvable ones. See Pyman, M. and Heywood, P. M. (2024), Sector-based action against corruption: A guide for organisations and professionals, Cham: Springer. One private sector reformer illustrated this approach in addressing bribery within the maritime sector. Instead of viewing the issue as a 'massive corruption problem in African ports', the challenge was divided into three components: facilitating behaviour change among ship captains; promoting collective action among these captains; and implementing technology for the reporting and monitoring of bribery. Interview under the Chatham House Rule. March 2023.

¹⁰⁰ In addition, when dealing with requests to hire family members, pressure from legislative oversight or dealing with 'banana peel rules'.

¹⁰¹ Interview under the Chatham House Rule, October 2024.

opportunities or support for capacity building.¹⁰² By offering these alternatives, reformers can be effective as they recognize the functionality of corruption in Nigeria, but are able to propose non-corrupt solutions.

Ultimately, the reflective autonomy displayed by reformers allowed them to uphold their integrity in corrupt environments while navigating multi-layered complexities. These approaches and tactics allowed them to be effective agents of change, rather than being written off as 'mavericks', isolated 'moral crusaders' or 'rebels'. Their reflective autonomy was also characterized by careful deliberation around ethical dilemmas, pragmatic risk assessment, and strategic navigation of corrupt environments, enabling them to maintain personal integrity amid challenging circumstances.

What factors hinder them?

Integrity role models interviewed for this paper all described occasions where they had struggled to follow formal rules or implement reforms because of a lack of support and resources, notably organizational backing. Reformers in government particularly described facing significant underfunding, forcing them to operate with minimal resources amid pressures from corrupt bosses, colleagues or junior personnel. In response to underfunding or low pay, some reformers focused on enhancing the quality of relatively low-cost but highly visible services that could gain positive publicity (for example, providing a secure marker of rigorous quality control guarantees in a government-run blood bank), increase their trustworthiness and potentially convert senior-level opponents of reform into supporters.

Noteworthy examples of government agencies that have built trust and positive attention in recent years through the leadership of integrity role models include the National Bureau of Statistics (NBS) and the Federal Competition and Consumer Protection Commission (FCCPC). Under the leadership of Yemi Kale (statistician-general in 2011–21), the NBS underwent significant reforms which improved its efficiency, data accuracy and levels of public trust. Kale's reforms included the implementation of updated methodologies in line with international best practices and standards for statistical reporting, the expansion of data collection (including new surveys), and timeliness of the availability of statistics, capacity building for staff and engagement with stakeholders – particularly with civil society, the private sector and general public. In the case of the FCCPC, under the leadership of Babatunde Irukera (head of the FCCPC from 2017-24), the commission implemented reforms to enhance consumer rights protections and regulatory frameworks. Irukera's reforms included strengthening mandates, 103 conducting consumer awareness campaigns and market surveillance and creating complaints mechanisms.

¹⁰² Interview under the Chatham House Rule, March 2023.

¹⁰³ This included clarifying frameworks for enforcing consumer protection laws, improving the commission's ability to investigate violations and increasing its capacity to impose sanctions on offenders. Additionally, the reforms promoted greater collaboration between the FCCPC and other regulatory agencies.

Reformers must anticipate resistance – for instance, from junior personnel or service users sceptical of change. Moreover, when entrenched interests and individuals benefit from corruption and see their access threatened, they can impose barriers and act as spoilers, retaliating against those seeking to act with integrity or prompting others to resist reforms. Institutional weaknesses can exacerbate resistance to behavioural change or reform because of a lack of adequate legal frameworks and protection, enforcement capacity or credible oversight mechanisms. Furthermore, behavioural change and reform are more difficult when tools and resources available to reformers are inadequate to protect and nurture nascent policy changes. ¹⁰⁴

Reformers often contend with the vested interests of others who benefit from the status quo, as well as efforts to sideline or dilute anti-corruption proposals to reduce their effectiveness.

Political interference and pressure also present significant challenges. For instance, responses to attempts to suppress poor statistics and hide corrupt acts can be exacerbated by an underestimation of the importance of political strategy on the part of some reformers. Reformers often contend with the vested interests of others who benefit from the status quo, ¹⁰⁵ as well as efforts to sideline or dilute anti-corruption proposals to reduce their effectiveness.

What factors support them?

Integrity role models described the advantages of political backing from supportive superiors (such as a supervising minister, line manager or mentor) during key moments of the reform cycle, as well as when policy changes are resisted or reformers are being harassed. The importance ascribed to these vertical relations underscores the importance of reform ideas aligning with, or at least not impeding, the objectives and values of powerful stakeholders to engender their support. Reformers also drew on these supportive relationships for knowledge, strategy advice, protection, solidarity, validation and amplification. 107

¹⁰⁴ Reformers also described facing additional challenges from a lack of readily available or accessible information for monitoring institutional activities or holding individuals accountable.

¹⁰⁵ One MDA reformer said: 'You are literally fighting with everybody, your board members, your staff, your directors, your National Assembly Committees, occasionally some ministers here and there and your family and friends.' Another procurement official described attempts by contractors to influence other staff in the agency: 'They [contractors] were causing those who work for me to disobey my instructions.' Interviews under the Chatham House Rule, March 2023.

¹⁰⁶ U4 Anti-Corruption Resource Centre (2017), *Understanding success and failure of anti-corruption initiatives*, briefing, Bergen: Chr. Michelsen Institute, https://www.u4.no/publications/understanding-success-and-failure-of-anti-corruption-initiatives.

¹⁰⁷ Interview under the Chatham House Rule, October 2024.

They also described using social media to communicate directly about their reform efforts and boost public support. Social media was seen as a powerful tool for mobilizing support, transparency, engaging and empowering citizens to monitor public projects. In some instances, public support created pressure on the government to reverse unpopular decisions or take popular actions (such as releasing withheld funds or increasing budgetary allocations to relevant agencies). Regular engagement with the public also helped reformers to identify areas for policy improvement, to report successes and to maintain momentum in anti-corruption campaigns.

What are the costs and benefits of resisting corruption?

Integrity role models both inside government, business and civil society reported facing intimidation and threats to their personal safety and family well-being. Many detailed the impact of these attacks and harassment on their mental health and resolve. A government reformer reported: 'I was sick for probably half the time, really, really, really sick from the stress and pressure. I was afraid half the time.' Consequences like this not only endanger reformers personally, but also have a chilling effect on others who might emulate them.

Reformers described experiencing social isolation, losing friendships and strained personal relations – including with their family. They also reported suffering career setbacks, such as being overlooked for promotion. Many committed anti-corruption reformers come under great pressure to leave their positions to save their lives, physical and mental health or family relationships.

Conversely, reformers also described some benefits of resisting corruption — particularly in non-monetary terms, such as having a sense of personal fulfilment and pride in their own integrity. This sense of fulfilment stemmed from acting according to their core principles and contributing positively to society. They also described focusing on long-term impact rather than short-term gains — contributing to systemic change and societal well-being rather than taking personal benefits.

How do integrity role models influence others?

Whether in government or civil society, integrity role models emphasized the importance of educating colleagues, mentoring junior personnel and striving to shift organizational cultures towards greater integrity. This reflected a nuanced understanding that sustainable change hinges not only on individual resistance to corruption, but also on collective efforts and systemic transformation.

Interviewees described creating monetary and non-monetary incentives to reward honest behaviour while modelling the desired positive behaviour. For instance, the CEO of a major construction company remarked:

[A] company's culture is shaped by the leader's values. They [leaders] should know the right path and guide people along it. Leadership also involves inspiring individuals towards a common goal.

A government reformer expressed a similar sentiment:

I see leadership as a matter of influence, and in my current position, I oversee several team members. The culture we foster is one of openness, where everyone feels free to speak, knowing they won't face opposition.

These comments highlight a crucial point that sustainable change demands not just individual resistance but also collective ethical values.

Studies emphasize the significant influence of witnessing ethical behaviour from leaders. Results of a recent randomized trial in Slovakia that employed behaviourally informed messaging based on social norms bolster the case. The results of this trial found that, compared to those in the control group, employees who were shown examples of strong ethical leadership were 14 times more likely to report risks such as potential conflicts of interest and non-transparent hiring practices. ¹¹⁰

Nevertheless, many reformers in Nigeria appeared uncertain about their impact or the sustainability of the reforms they had worked so hard to achieve. They had mostly been operating without guidance, navigating many of the challenges they faced with just their personal integrity, independent-mindedness and technical abilities. In addition, the experiences and strategic lessons that could be drawn from reformers in Nigeria is untapped. Most of those interviewed for this paper had never been debriefed or formally interviewed about their experiences before. They had largely operated in isolation from broader anti-corruption efforts, and remained unconnected from and hesitant to join social movements against corruption.

The next chapter explains how coalition-building efforts in Nigeria around anti-corruption and accountability can be improved by nurturing, engaging with and learning from integrity role models such as those interviewed for this paper.

¹¹⁰ OECD (2024), Improving Corruption Risk Management in the Slovak Republic: Results from a 2023 Experiment in Applying Behavioural Insights to Public Integrity, report, Paris: OECD Publishing, https://doi.org/10.1787/45f8d2e0-en.

¹¹¹ Many of the reformers described the SNAG interviews as cathartic and as offering them the first opportunity to reflect on their experiences.

O5 A plan for action against corruption

Better coordination between reform-minded lawmakers, professional networks, grassroots leaders and individual role models can help change social norms, and both inspire and sustain collective action against corruption.

Research throughout the SNAG project has highlighted the complex inter-relationships between individual behaviour, social expectations and political dynamics in Nigeria, and how they play a crucial role in entrenching corruption. While anti-corruption agencies exist in Nigeria, they are frequently politicized, have limited capacity or resources, while their officials are often subject to significant personal risks if they try to oppose corruption. Attempts at transformative change tend to fail in an environment that normalizes corruption. Individuals and communities find themselves trapped in a powerful collective action problem, as corruption has become a key part of how people navigate life and solve problems.

To tackle persistent corruption, this research paper argues for a shift towards a more networked and participatory strategy. Evidence from the SNAG project emphasizes the importance of linking and supporting reformers at multiple levels. While aggressive top—down reform agendas can lead to revolutionary changes to both formal and informal institutions, such 'big bang' approaches are rare, and the political will to initiate them still requires a collective, political and strategic process. Therefore, a more context-aware approach is essential — one that actively supports credible, motivated and strategic actors and networks. It should aim to overcome barriers to cooperation and form influential coalitions that can effectively challenge the status quo, capitalize on reform opportunities and enact change in a way that is perceived locally as legitimate.

Importantly, it should leverage the influence of integrity role models. ¹¹² Better coordination among reform-minded officials and lawmakers, professional networks, grassroots leaders and individual role models can help them to influence public opinion and inspire collective action against corruption. The cohort of trailblazers interviewed as part of this paper are among them. Examples of the potential of this approach include the MacArthur Foundation's 'On Nigeria' cohort model called *Joinbodi* (a Nigerian Pidgin word meaning 'solidarity' or 'working together'). *Joinbodi* provides a template for how diverse stakeholders and communities of practice can collaborate in order to advance accountability within governing institutions and influence sustainable behavioural change at a societal level. ¹¹³

The recent decision by Nigeria's Supreme Court on local government autonomy may also open a window for advancing bottom—up accountability. ¹¹⁴ The decision removes the authority to set local priorities, manage finances and fulfil constitutional responsibilities from state governors and returns it to Nigeria's 774 local councils. ¹¹⁵ This transfer of powers offers an opening for anti-corruption and transparency coalitions — which are typically concentrated in the big cities like Abuja and Lagos — to collaborate more closely and widely at the local level. Ongoing progress on transparency can support a localized focus on accountability, and public pressure can be mobilized to encourage engagement with and oversight of local officials.

The findings from each of the SNAG surveys indicate an untapped willingness among Nigerians to participate in collective actions that advance accountability. This sentiment exists especially among the poorest and those most disadvantaged by corruption. Anti-corruption coalitions can leverage such popular support to press for reforms that can equip citizens to challenge elite-level impunity. Such reforms include, among others, legislation mandating both the declaration of assets held by public officials and the right for the public to access to such declarations, 116 a strengthened freedom of information regime 117 and the passage of a whistleblower protection law.

¹¹² They can also play a crucial role in exposing pluralistic ignorance, which is the gap between people's personal beliefs about a practice and their perception of others' beliefs. Many common forms of corruption in Nigeria are sustained by people being unaware that others share their private disapproval of corruption. These mistaken beliefs can perpetuate corrupt practices that most people personally disapprove if left unexposed.

¹¹³ Salihu, A. and Cheung, G. (2024), 'Sustaining Solidarity Against Corruption through Joinbodi', MacArthur Foundation, 30 October 2024, https://www.macfound.org/press/perspectives/sustaining-solidarity-against-corruption-through-joinbodi.

¹¹⁴ Odusote, A. (2024), 'Nigeria's highest court says local governments can spend their funds without interference: why this matters', The Conversation, 14 August 2024, https://theconversation.com/nigerias-highest-court-says-local-governments-can-spend-their-funds-without-interference-why-this-matters-236257.

¹¹⁵ State governorships are modelled after the 'super-executive' presidency model in Nigeria, which has allowed governors to act without meaningful checks and balances from state legislative assemblies, courts or auditors. Governors have frequently postponed or cancelled local elections and replaced elected officials with appointees. Local government has therefore had minimal incentive to respond to demands from citizens. The local government autonomy decision also revives the potential of the institutionalization of the fiscal sustainability plan proposed by the Buhari administration and blocked by the lack of cooperation of subnational governments. In addition, despite the existence of conditional grant programmes, such as the Universal Basic Education initiative and the Primary Health Care initiative, state governments have repeatedly failed to provide the necessary matching funds. Instead, they continue to rely heavily on substantial unconditional financial transfers from the federal government. This accountability-free arrangement has hindered developmental progress and service delivery at the local level.

116 Lifestyle audits are also likely to be popular tools especially in view of the next general election, scheduled for 2027.

117 It is currently limited by its designation to the political office of the Minister of Justice and Attorney-General and poor funding for FOIA units.

How to empower Nigeria's integrity role models and build effective coalitions to fight corruption

It is crucial that anti-corruption campaigns are led by Nigerians and avoid the pitfalls of becoming hierarchical, politicized or compromised by perceptions that they are being driven by external donors. It is here that the model of decentralized and flexible networked coalitions may be fruitful. Existing anti-corruption reformers who have emerged independently and organically within Nigeria's institutions and businesses can connect grassroots campaigns and civil society activism, as well as increasing awareness and communication among citizens and their representatives. Credible and reputable religious¹¹⁸ and traditional leaders can play a crucial role by providing moral leadership and credibility that enhance communication between constituents and their representatives.

It is crucial that anti-corruption campaigns are led by Nigerians and avoid the pitfalls of becoming hierarchical, politicized or compromised by perceptions that they are being driven by external donors.

Nigeria's integrity role models show that it is possible for credible individuals to mobilize popular support for change. But to achieve this at scale, it will be crucial to learn from their past experiences and ensure that policy is framed to support their efforts and amplify their voices.

The following recommendations require action by policymakers in government institutions, specifically the executive branch, legislative bodies, judiciary, law enforcement and anti-corruption agencies (ACAs):

Implement legal reforms to accelerate norm change

Laws and policy interventions that align with social norms of fairness, empathy and civic responsibility tend to be more effective. Nigeria's anti-corruption agenda can be reoriented to better reflect public expectations of equitable treatment and accountable leadership, as well as lower the cost of resisting corruption.

The government should strengthen its commitment to anti-corruption by working with the National Assembly to pass legislation mandating asset declarations and ensuring public access to these records, with consequences for non-compliance. Enabling citizens to monitor the financial status of leaders over time would facilitate a sense of governance as a shared endeavour. A precedent for asset declaration was set by former president Buhari and his vice-president, Yemi Osinbajo, which should be followed and strengthened by a formal public

¹¹⁸ The example of the Catholic Church in Kenya rejecting cash donations and pledges by President William Ruto is illustrative of the way religious leaders and groups can advance accountability. See Nzwili, F. (2024), 'Kenyan Catholic Church Rejects President Ruto's Financial Donation', OSV News, 21 November 2024, https://www.osvnews.com/2024/11/21/kenyan-catholic-church-rejects-president-rutos-financial-donation. Research also shows that women and young people are often viewed as credible and trustworthy anti-corruption advocates.

disclosure system. This can only be achieved by amending the Code of Conduct Bureau (CCB) and Tribunal Act to clearly define access terms. Enhancing CCB effectiveness is also crucial, particularly by introducing legislation that broadens public access to asset declarations and ensures proactive responses to Freedom of Information Act requests.

Accountability gaps under the Proceeds of Crime Act can be addressed by the establishment of transparent standard operating procedures for asset recovery that ensure affected communities are consulted in the utilization of recovered assets.

Finally, the ICPC should use its powers to investigate public officials regarding suspicious wealth, while ACAs should collaborate with the Central Bank of Nigeria to verify asset declarations.

Protect integrity role models from retaliation and speed up judicial processes

Given the personal and professional costs suffered by individuals who resist corruption, they need comprehensive protection programmes which include confidential reporting channels, legal safeguards, physical safety protocols and mental health support.

The conflict between Nigerian laws prioritizing secrecy and the public interest must be addressed. The National Assembly must work urgently to enact comprehensive legislation to protect individuals who report corrupt activities. Well-considered legislation would help shift societal attitudes and leverage existing values of fairness, framing whistleblowing as courageous and commendable. To date, Ghana remains the only West African country with whistleblower legislation.

The National Assembly should also establish special courts dedicated to handling corruption cases, as proposed in the Special Courts (Establishment) Bill. Such courts should have judicial independence and enhanced digital case-management systems. This initiative would speed up judicial processes and signal society's intolerance for corruption, reinforcing the expectation that offenses will be dealt with promptly.

Use technology to increase transparency

Increasing transparency at the state and local levels fosters a shared sense of collective responsibility. It can be achieved by mandating and implementing e-procurement systems across all ministries, departments and agencies. Granting state-level audit offices greater administrative and financial autonomy, coupled with robust audit laws, would further reinforce accountability in public fund management. Finally, a legal framework for tracking constituency projects and intervention funds would empower citizens and creates vital feedback mechanisms.

Technology and digitization can play a crucial role in transparency and closing corruption loopholes. Government role models involved in reform efforts also described introducing new accountability policies to change organizational culture. Examples include implementing Open Government Partnership and e-government

platforms. 119 Private sector benchmarks include the Corporate Governance Rating System established by the Convention on Business Integrity and the Nigerian Stock Exchange. 120

Expanding e-governance platforms, ¹²¹ and open data initiatives that enable public access to government records and transactions ¹²² can help establish accountability frameworks that mandate regular audits and establish clear channels for reporting unethical behaviour. Well-placed reformers, supported by adequate resources, can simplify bureaucratic processes, strengthen oversight and improve services, reducing the functional appeal of some corrupt practices. These changes also build trust and create feedback loops that erode corrupt norms. ¹²³

The following recommendations are most effective when amplified by civil society groups and media, with support from government, the private sector and the business community:

Emphasize the importance of integrity, using the examples of past and present role models

The reformers interviewed for this paper were nearly all inspired by mentors in early life. Creating and expanding ethical education programs and incorporating anti-corruption messages into school curriculums and workplaces targeting future leaders reinforce positive role modelling. Examples include the initiatives of STEP UP Nigeria. Programmes which emphasize the importance of integrity, personal values, and focus on positive role models can help nurture a self-perception of honesty and accountable behaviour from an early age and foster generational shifts, transforming the essence of shared identity. However, it is crucial that ethical lessons are taken out of the classroom. Young children need opportunities to learn by doing – i.e. engaging in actions that achieve concrete outcomes for their communities. This real-world experience is crucial to prevent young people developing a sense of ambivalence or apathy towards corruption. 125

Highlighting individuals who openly defy corrupt norms reinforces the idea that doing the right thing is celebrated in socially meaningful ways, while unethical behaviour is rejected as a part of group identity. Our research findings also

¹¹⁹ 'I came in, collected everything and put it on the website, so everything is available on the website. That entire business is dead because who's going to pay you for data that they can get themselves on the website?'. Interview under the Chatham House Rule, March 2023.

¹²⁰ Basel Institute of Governance (2014), 'Nigeria: Corporate Governance Rating System (CGRS)', https://collective-action.com/explore/initiatives/1492.

¹²¹ For example, India's 'Aadhaar' identity system and e-governance solutions have reduced opportunities for small-scale corruption in service delivery. See Muralidharan, K., Niehaus, P. and Sukhtankar, S. (2016), 'Building State Capacity: Evidence from Biometric Smartcards in India', *American Economic Review*, 106(10), pp. 2895–929, https://ideas.repec.org/a/aea/aecrev/v106y2016i10p2895-2929.html.

¹²² This will support efforts by transparency NGOs such as Follow the Money, BudgIT and #CitizensNeighbourhoodWatch to track and report community projects.

¹²³ Technology can also facilitate online initiatives such as Partners United, an online community for pro-accountability civil society and citizens to connect and exchange information. Partners United (undated), 'About Us', https://partnersunited.org/about.

¹²⁴ For example, their 'Catch Them Young Initiative'. See Step Up Nigeria (undated), 'Catch Them Young Initiative', https://stepupnigeria.org/catch-them-young-initiative.

¹²⁵ The author would like to appreciate and acknowledge reviewer 3 for sharing this insight in their comments.

support the importance of recognition ('naming and faming') programmes, media campaigns, fellowships and civic awards for individuals who model ethical conduct – for example, the Accountability Lab's global 'Integrity Icon' programme. ¹²⁶

Similar measures have been proven to work in other parts of the world. For instance, a youth fellowship programme in Nepal that paired young people with integrity role models successfully changed opinions about corruption, public service and increased their social trust. Successful interventions have also created relatable fictional role models to exemplify desirable lifestyles, reframing the moral environment and encouraging behavioural change. 128

Mentorship programmes are also impactful. In Latin America, for example, mentorship relationship between professors and students and former supervisors and new leaders have seen many reformers strategically navigate moral dilemmas.¹²⁹ New candidates may also be paired with or 'shadow' integrity role models.¹³⁰ Buddy programmes can help people resist social or negative peer pressures, and training and capacity-building programmes across government that emphasize ethical decision-making and empower workers to resist and report corruption.¹³¹

Train integrity role models in diplomacy and strategic thinking

Diplomacy and strategic thinking are vital in navigating the political and interpersonal challenges of changing entrenched norms. Comprehensive leadership training on communicating ethics and values, modelling ethical behaviour and decision-making, reflective autonomy and strategic handling of ethical dilemmas. Organizations could also set up independent ethics committees, offering resources and guidance for implementing gradual change. There is also scope for equipping reformers – and public officials generally – with tools to conduct contextual risk assessments, undertake political economy and stakeholder-mapping, and support strategic decision-making, including by providing access to case studies of successful

¹²⁶ According to the Accountability Lab, there are currently 13 national campaigns around the world, 245 winning integrity icons from 15,000 nominations from the public. Accountability Lab (undated), Accountability Lab Strategy 2023-2026, https://accountabilitylab.org/wp-content/uploads/2023/01/Accountability-Lab-Strategy-2023-to-2026.pdf.

¹²⁷ Bentley, J. and Mullard, S. (2019), Follow the integrity trendsetter: How to support change in youth opinion and build social trust, Bergen: Chr. Michelsen Institute, https://www.u4.no/publications/follow-the-integrity-trendsetter. 128 For example, in Peru, the TV show Simplemente Maria contributed to a rise in enrolment in literacy classes. Meanwhile, in India, the radio soap opera Tinka Tinka Sukh prompted several villages to discontinue dowry practices. For an examination of these examples, see Bicchieri (2017), Norms in the Wild. Nigeria-based entertainment groups have also made interventions based on fictional role models dealing with moral dilemmas such as a 2019 political drama film titled 4th Republic: See 4th Republic Film (2020), '4th Republic', https://4threpublicfilm.com. 129 Guerzovich, F., Gattoni, M. S. and Algoso, D. (2020), Seeing new opportunities: How global actors can better support anticorruption reformers, report, New York: Open Society Foundations, https://www.opensocietyfoundations.org/ publications/seeing-new-opportunities-how-global-actors-can-better-support-anticorruption-reformers. 130 For example, peer-led approaches to changing norms of bribery and weaken norms of reciprocity among hospital staff in Tanzania achieved positive and statistically significant results by empowering champions. See Kubbe, I., Baez-Camargo, C. and Scharbatke-Church, C. (2024), 'Corruption and Social Norms: A New Arrow in the Quiver', Annual Review of Political Science, 27, pp. 423-44, https://doi.org/10.1146/annurev-polisci-051120-095535. Integrity champions and leadership initiatives are very popular around the world and there are several studies that confirm their effectiveness in diverse sectors. For example, Johnston and Kpundeh (2004), Building a clean machine; Bstieler, L., Hemmert, M. and Barczak, G. (2015), 'Trust in University-Industry Collaborations in the U.S. Biotechnology Industry: IP policies, shared governance, and champions', Journal of Product Innovation Management, 32, pp. 111-21, https://doi.org/10.1111/jpim.12242; Hendy, J. and Barlow, J. (2012), 'The role of the organisational champion in achieving health system change', Social Science & Medicine, 74(3), pp. 348-55, https://doi.org/10.1016/j.socscimed.2011.02.009.

¹³¹ The implementation of whistleblower protection laws is a minimum requirement to ensure that individuals who report corrupt transactions are protected against retaliation.

¹³² Leadership training institutes such as Nigeria's National Institute for Policy and Strategic Studies (NIPSS) are well placed to offer such training.

anti-corruption strategies elsewhere. Academies such as the School of Politics, Policy and Governance (SPPG) have the potential to renew Nigeria's leadership pipeline by showing young agents of change how to navigate Nigeria's political landscape, foster connections and build a supportive ecosystem for the country's next generation of leaders and public officials to collaborate on influencing institutional change. ¹³³

The following recommendations are for all levels of governing institutions, constituencies and societal sectors:

Build networks to bring integrity role models together and grow their influence

The experiences of Nigeria's integrity role models highlight the need for a more networked approach and enhanced coordination. To grow their influence, these reformers and those who aspire to be like them need to be connected via resource hubs where they can share experiences, access examples of good practice and develop a sense of solidarity, shared integrity and social capital. Platforms like these would help to undermine descriptive norms of corruption whether in government, business or civil society, while also promoting alliances and collaborative networks among reformers and like-minded individuals within and across organizations and society – creating a multi-layered network of accountability. 134

Networks could also be expanded to take in enhanced partnerships between government agencies and NGOs, via collaborative projects that combine the capacities of multiple stakeholders and broaden the impact of reform initiatives. Reformers in government need support through multi-stakeholder coalitions that include like-minded representatives from other government entities, civil society and private sector actors to share resources and amplify accountability efforts in a collaborative environment.

Seek international support for socially meaningful penalties

The US administration's decision to suspend enforcement of its Foreign Corrupt Practices Act is an exceptional setback for global efforts to 'denormalize' corruption. Nigeria's other international partners who recognize the risks of corruption and the importance of strengthening global integrity norms must therefore step up. Partners such as the UK should increase budgetary allocations to their anti-corruption bodies to facilitate robust investigations and effective criminal prosecutions of transnational financial crimes. Legal consequences for corruption have a powerful norm-setting role over time and can increase public trust.

¹³³ School of Politics, Policy and Governance (undated), 'About Us', https://thesppg.org.

¹³⁴ Examples of alliances and collaborative networks include Mexico's National Anti-Corruption System and Kenya's National Integrity Alliance. In East Asia, collaborations among NGOs, ethical business groups, and supportive local governments have established procurement monitoring centres to oversee public tenders. See OECD (2007), Fighting bribery in public procurement in Asia and the Pacific, Proceedings of the 7th regional seminar on making international anti-corruption standards operational, 5–7 November 2007, https://www.oecd.org/content/dam/oecd/en/publications/reports/2008/09/fighting-bribery-in-public-procurement-in-asia-and-the-pacific_g1gh9408/9789264046955-en.pdf.

¹³⁵ Fabricius, P. (2025), 'Is Trump giving US companies green light on bribery?', Institute for Security Studies, 14 February 2025, https://issafrica.org/iss-today/is-trump-giving-us-companies-the-green-light-on-bribery.

136 Kassa, S. and Guy, M. (2025), Strategic corruption, guide, Basel: Basel Institute of Governance, https://baselgovernance.org/sites/default/files/2025-02/QG37-Strategic%20corruption.pdf.

Taking action against corruption in Nigeria

Empowering anti-corruption role models and coalitions to change social norms

Finally, foreign governments can contribute to socially meaningful penalties by implementing visa bans and targeted sanctions on Nigerian politicians and officials credibly implicated in corruption, and by publicizing the names of those involved. Measures like this will help raise the personal costs of corruption, and will strengthen social sanctions such as public shaming, loss of respectability and status for non-compliance with new social expectations of civic responsibility and accountability.

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Cover image: A man looks on as he sits on his cart near Lokoja International Market, Lokoja, Nigeria, 21 October 2024.

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