

Nigeria Extractive Industries Transparency Initiative
STAKEHOLDER ANALYSIS AND MAPPING
REPORT

June 2017

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ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
AfDB	Africa Development Bank
ANAN	Association of National Accountants of Nigeria
ASMR	Artisanal & Small Scale Mining Department
ASUU	Association of Academic Staff Union of Universities
BPP	Bureau of Public Procurement
BPSR	Bureau of Public Service Reform
CAC	Corporate Affairs Commission
CASS	Centre for Advance Social Sciences
CBN	Central Bank of Nigeria
CBO	Community Based Organisation
CCB	Code of Conduct Bureau
CCECC	China Civil Engineering Construction Company
CISLAC	Civil Society Legislative Advocacy Centre
CORC	Crude Oil Reconciliation Committee
CRA	Corruption Risk Assessment
CRFFN	Council for Regulation of Freight Forwarding on Nigeria
CSOs	Civil Society Organisations
DFID	Department For International Development
DMO	Debt Management Office
DPR	Department of Petroleum Resources
DSS	Department of State Security
EFCC	Economic and Financial Crimes Commission
EFO	Ecological Fund Office
EITI	Extractive Industries Transparency Initiative
ES	Executive Secretary
FAAC	Federation Accounts Allocation Committee
FASD	Fiscal Allocation and Statutory Disbursement
FBO	Faith Based Organisation
FCT	Federal Capital Territory
FIRS	Federal Inland Revenue Service
FMoj	Federal Ministry of Justice
FMoT	Federal Ministry of Transport
FMTI	Federal Ministry of Trade and Investment
FOSTER	Facility for Oil Sector Transparency and Reform
FRC	Fiscal Responsibility Commission
FRSC	Federal Road Safety Commission
GIZ	German Technical Cooperation
G-SIPOC	Governance, Supplier, Input, Process, Output, and Customer
HR	Human Resource

Acronym	Meaning
IATT	Inter-Agency Task Team on Anti-Corruption
ICAN	Institute of Chartered Accountants of Nigeria
ICPC	Independent Corrupt Practices Commission
IMF	International Monetary Fund
IMTT	Inter-Ministerial Task Team
MCO	Mining Cadastre Office
MDAs	Ministries, Departments and Agencies
MDCN	Medical And Dental Council of Nigeria
MDG	Millennium Development Goals
MECD	Mines Environmental Compliance Department
MFA	Ministry of Finance
MID	Mining Inspectorate Department
MITEI	Media Initiative for Transparency in Extractive Industries
MMSD	Ministry of Mines & Steel Development
MoF	Ministry of Foreign Affairs
MoU	Memorandum of Understanding
NAPIMS	National Petroleum Investment Management Services
NAPTIP	National Agency for the Prohibition of Trafficking in Persons
NASS	The National Assembly
NBA	Nigerian Bar Association
NBS	National Bureau of Statistics
NCDMB	Nigeria Content Development & Monitoring Board
NCS	Nigeria Custom Service
NDDC	Niger Delta Development Commission
NDLEA	National Drug Law Enforcement Agency
NEC	National Economic Council
NEITI	Nigeria Extractive Industries Transparency Initiative
NEPZ	Nigeria Export Processing Zone
NFIU	Nigeria Financial Intelligence Unit
NGAs	Non-Governmental Agencies
NGCL	Nigeria Gas Company Limited
NGF	Nigerian Governors Forum
NGO	Non-Governmental Organisation
NGSA	Nigeria Geological Survey Agency
NHRC	National Human Rights commission
NIMASA	Nigerian Maritime Administration and Safety Agency
NIOMN	National Iron Ore Mining Company, Itakpe
NIPC	Nigeria Investment Promotion Council
NIS	Nigeria Immigration Service
NLC	Nigeria Labour Congress
NLNG	Nigeria Liquefied Natural Gas Limited
NMA	Nigeria Miners Association

Acronym	Meaning
NMDC	National Metallurgical Development Centre, Jos
NNPC	Nigeria National Petroleum Corporation
NPA	Nigeria Ports Authority
NPDC	Nigeria Petroleum Development Company
NPF	Nigeria Police Force
NPHCDA	National Primary Health Care Development Agency
NRGI	Natural Resource Governance Institute
NSC	National Shippers Council
NSRMEA	National Steel Raw Material Exploration Agency, Kaduna
NSWG	National Stakeholder Working Group
NUPENG	Nigeria Union of Petroleum and Natural Gas Workers
NYCN	National Youth Council of Nigeria
OAGF	Office of the Accountant General of the Federation
OAtGF	Office of the Attorney General of the Federation
OAGF	Office of the Auditor General of the Federation
OGPI	Open Government Partnership Initiative
OPTS	Oil Producing Traders Section
ORTI	Oil Revenue Tracking Initiative
OSGF	Office of the Secretary to the Government of the Federation
PCC	Public Complaints Commission
PEF	Petroleum Equalisation Fund
PENGASSAN	Petroleum and Natural Gas Senior Staff Association of Nigeria
PPMC	Pipelines and Products Marketing Company
PPRA	Petroleum Products Pricing Regulatory Agency
PPSRC	Petroleum Products Sales Reconciliation
PTDF	Petroleum Technology Development Fund
RBDA	River Basin Development Agency
RCC	Reynold Construction Company
RMAFC	Revenue Mobilization Allocation & Fiscal Commission
SCUML	Special Control Unit against Money Laundering
SGF	Secretary to the Government of the Federation
SMI	Social Media Influences
SOs	Strategic Objectives
SPDC	Shell Petroleum Development Company
SURE-P	Subsidy Reinvestment and Empowerment Program
TETFUND	Tertiary Education Trust Fund
TUC	Trade Union Congress
TUGAR	Technical Unit on Governance & Anti-Corruption Reforms
UNODC	United Nations Office on Drugs and Crime
VIO	Vehicle Inspectorate Office
WIIFIM	What is in it for me

1. EXECUTIVE SUMMARY

Background

The Nigerian Extractive Industries Transparency Initiative (NEITI) was established in 2007 on the dual pillars of the NEITI Act and the EITI Precepts. It has since conducted Fiscal, Monetary and Process Audits on the Extractives Sector in Nigeria. The publication of audit reports, as stipulated by the EITI Precepts have however not led to the demand for accountability and transparency in the extractive industries as expected.

This observation led to a new Theory of Change which played a key role in the development of the NEITI's new corporate strategy (2017 – 2021) in which the NEITI desires to be 'an active and effective facilitator of the reversal of the effects of resource curse in Nigeria'. The NEITI recognizes that this positioning requires comprehensive identification and mapping of the stakeholders implicated in achieving reversal of resource curse. It has therefore partnered with DfID's LEAP program to identify, analyze and map these stakeholders, and to develop a strategy and framework for engaging them.

Project Objectives and Methodology

The objective of this Stakeholder Mapping and Engagement Strategy and Framework is to provide guidance to NEITI on how to effectively and continuously manage its key stakeholders and leverage their influences and interests to achieve its mandate. This can only be done through the careful examination of key stakeholder profiles and their overarching interests that NEITI can strategically align with. A stakeholder analysis would enable NEITI achieve its strategic objectives as it allows a detailed understanding of the mandate, interest, and influence of its network of stakeholders, and the individuals who exercise real powers in the various organisations.

Literature review shows that political context mapping, of which stakeholder mapping is a tool, is crucial to the success of agencies looking to drive reform in complex political environments. The stakeholder analysis and mapping combined both primary and

secondary methods of data collection with data validation exercises. These methods included: Document Review, Data Collection, One-on-One Interviews and Focus Group Discussions. The result was a comprehensive analysis of stakeholders and engagement strategies that will ensure that NEITI maximizes the benefits accruable to its stakeholders by virtue of their positions.

Findings

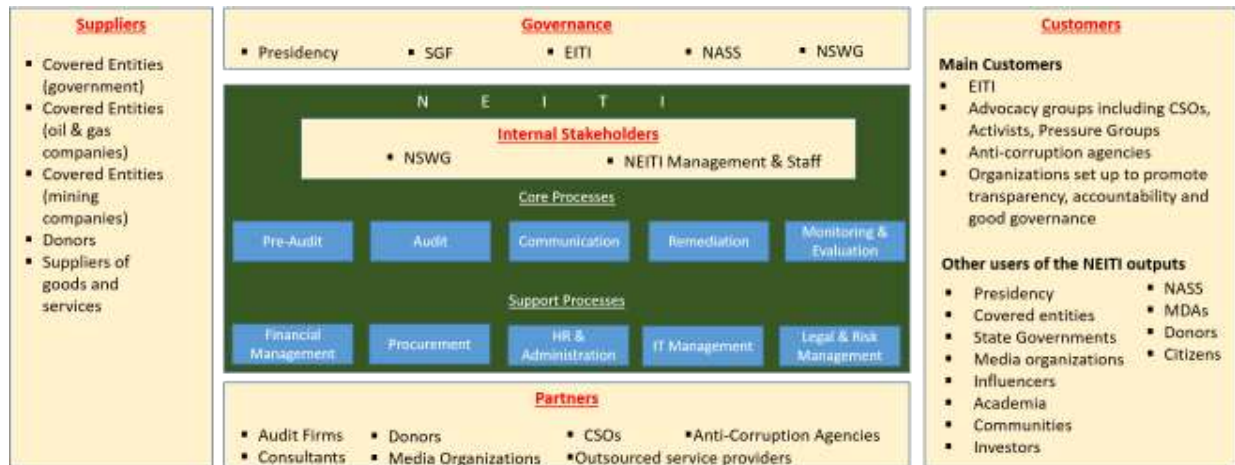
The stakeholder analysis and mapping process has provided a detailed list of NEITI's stakeholders and their expected roles (available in Appendix 1). NEITI's Communication Strategy – which is due for review – employed a number of stakeholder engagement methods. A review of these methods revealed the strengths and weaknesses of NEITI's previous stakeholder engagement efforts, most notably, the need to engage more with the Presidency and the National Assembly. The absence of a framework for measuring, monitoring, tracking and rewarding stakeholder engagement efforts was also observed.

Validation sessions organised with representatives of key stakeholder groups (Governance, Partners and Suppliers) revealed stakeholder perspectives of NEITI. The key recommendations from the various stakeholder groups can be summarised into the need for NEITI to be more proactive with its reform efforts, engage more strategically with key drivers of change, and to generally do more in its pursuit for good resource governance in Nigeria. A Citizen's Survey was also administered and revealed that citizens felt they had low power with regards to demanding for accountability in the Extractives industry. They suggested that NEITI could better engage with them by communicating its key messages more aggressively. NEITI staff also expressed, via survey responses, that NEITI's engagement with them as internal stakeholders could be improved with better communication, motivation and target setting. A general recommendation from all stakeholder groups was the need for NEITI to improve the timeliness of publication of its reports.

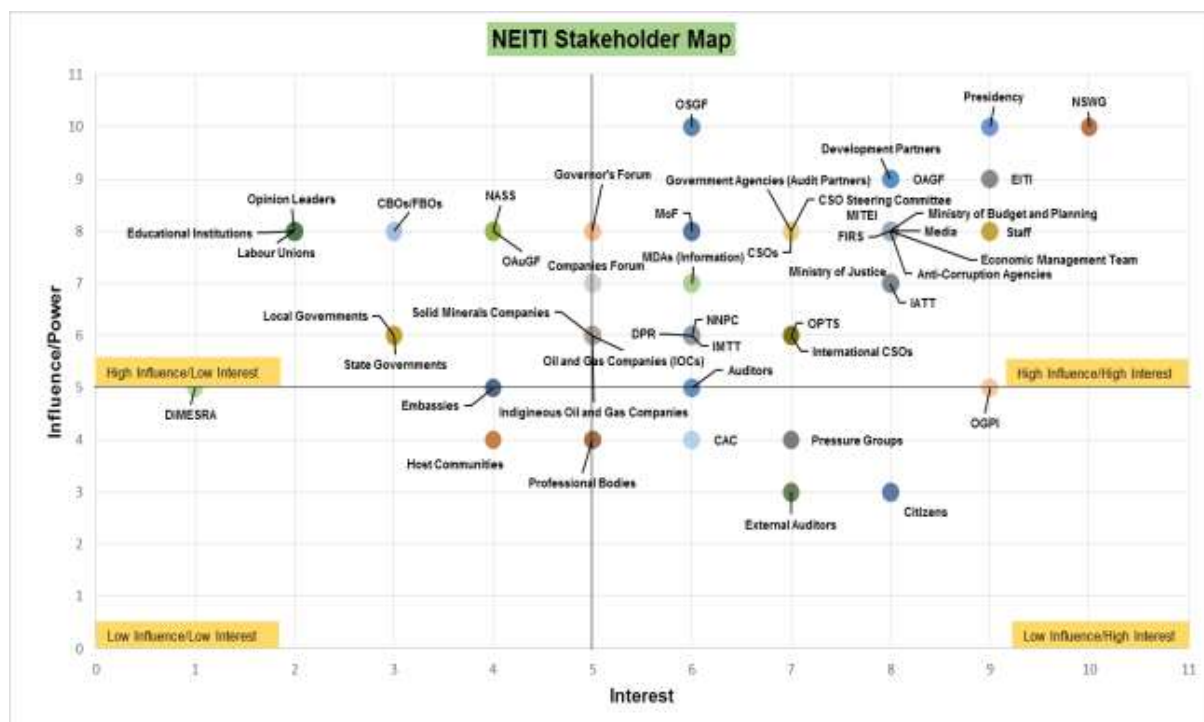
Stakeholder Analysis and Mapping

Stakeholders were mapped by; the roles they play in NEITI's processes, interest and influence, distance, strategic objective, 'owner' department, commitment and common interests.

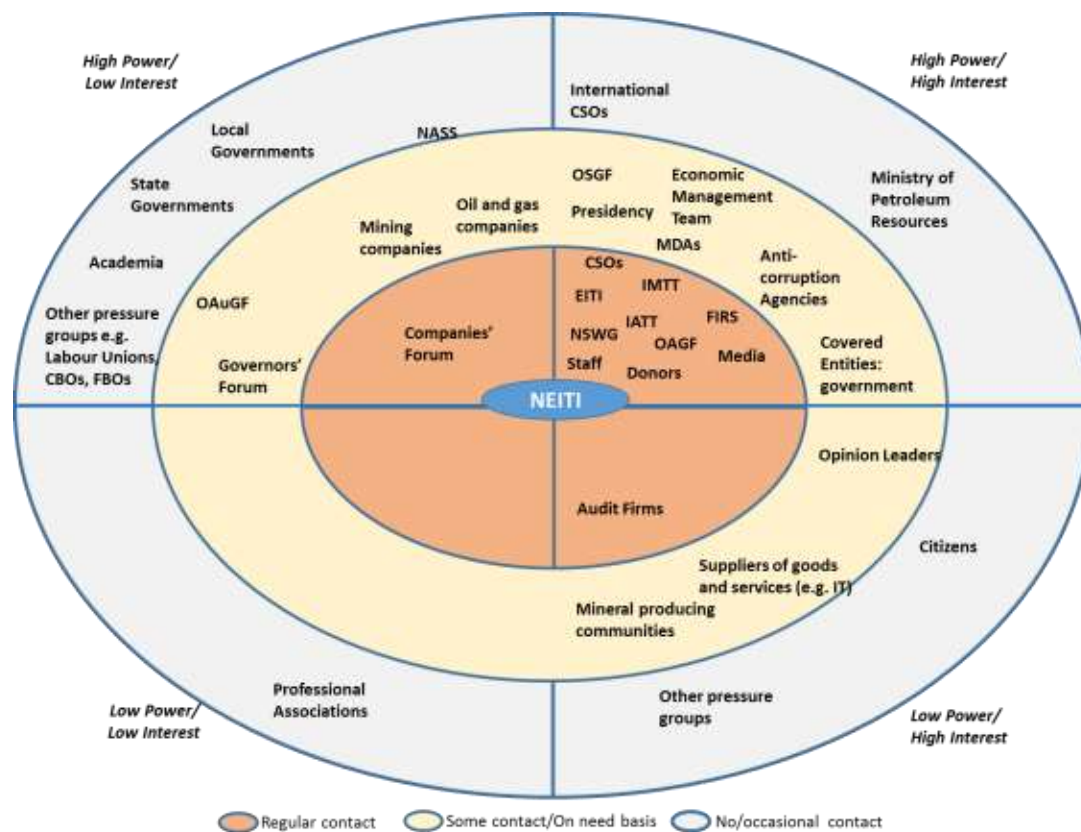
1. The NEITI Stakeholders by Role



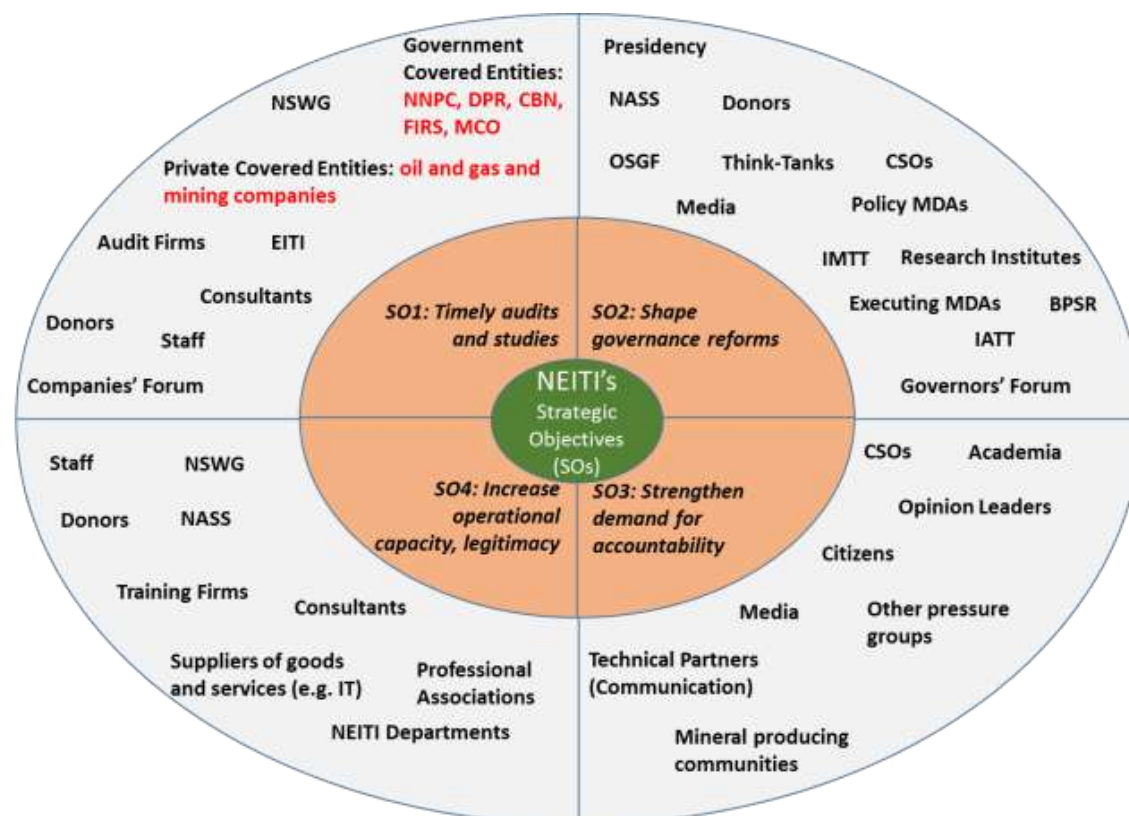
2. The NEITI Stakeholders by Power/Interest



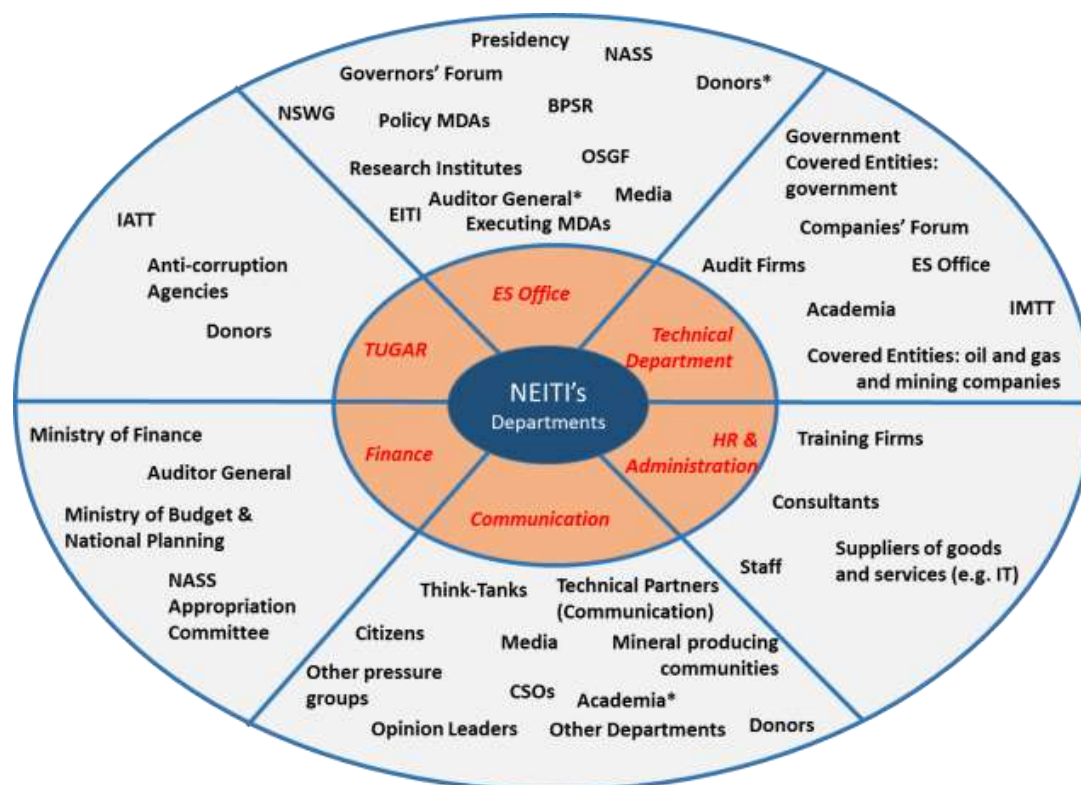
3. The NEITI Stakeholders by Distance



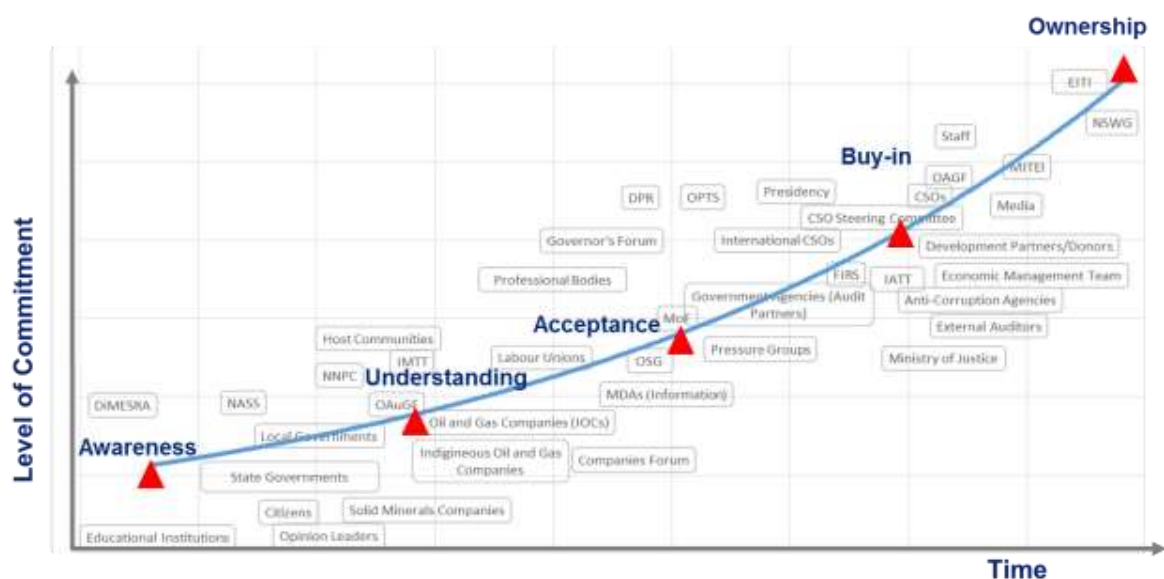
4. The NEITI Stakeholders By Objectives



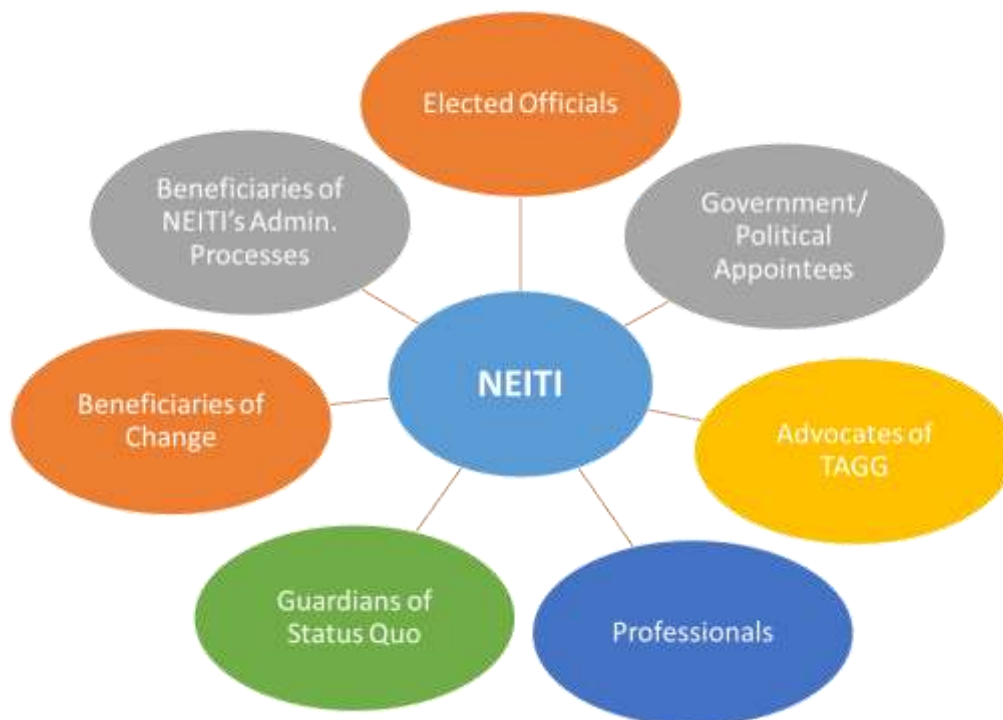
5. The NEITI Stakeholders by 'Owner' Department



6. The NEITI Stakeholders by Commitment



7. The NEITI Stakeholders by Common Interest



Stakeholder Engagement Strategies

General engagement strategies have been recommended for all stakeholder groups which include the outline of clear courses of action that stakeholders can take, budgetary considerations for the tools stakeholders would need, designation of key relationship managers for each stakeholder group, and the clear crafting of key messages of what stakeholders must do. The general strategies also include ensuring that all communication to stakeholders resonate and reinforce the specific message crafted for each stakeholder. Stakeholder engagement should be dynamic and responsive to changes in the political environment and should be able to skillfully leverage emerging issues to further drive the agenda for greater accountability and governance of extractive resources.

Based on the placement or categorisation of stakeholders on the various maps, specific engagement strategies were recommended for stakeholder groups.

- 1.1 *High Power and High Interest stakeholders* which include the NSWG, Presidency, Development Partners, EITI, IMTT and IATT: there should be periodic formal and informal contact between the NEITI Board and the

Management of the stakeholder agency. There should also be a designation of key relationship managers for stakeholders in this category. The Presidency, in particular, should be briefed regularly on NEITI's activities with clear, feasible lines of action towards resolving remediation issues drawn out. Similar strategies should be used for the elected officials sub-group, but with a constant monitoring of their interests as they change and an identification of their incentives/disincentives coupled with awareness creation of NEITI's agenda at the beginning of their tenure.

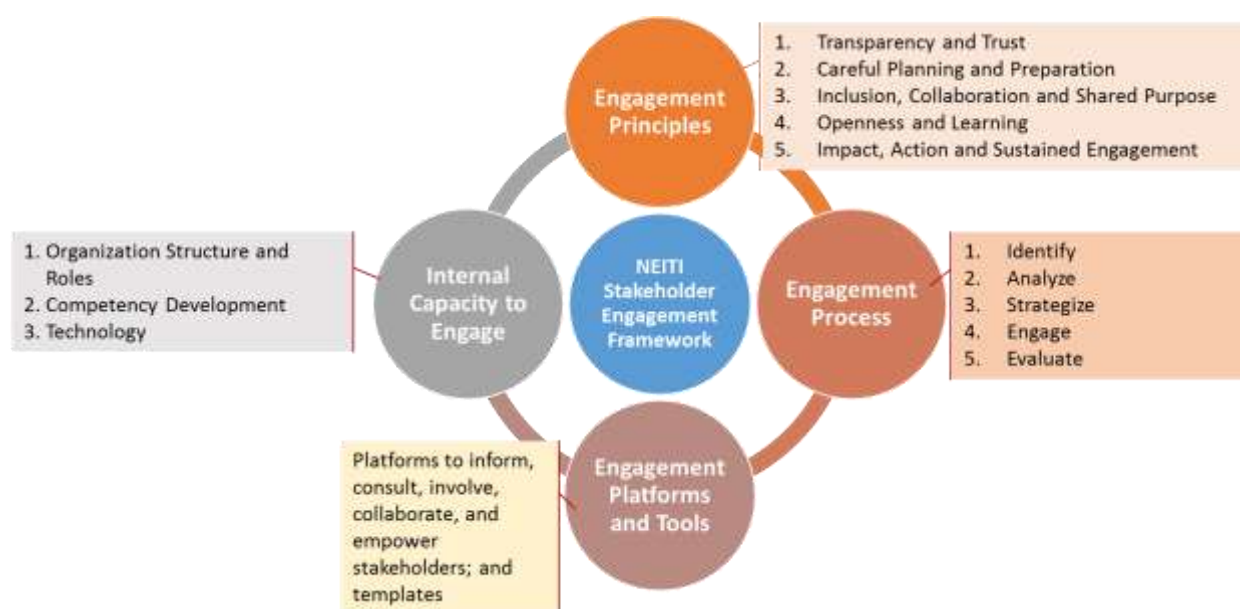
- 1.2 *High Power/Low Interest stakeholders:* potential reform champions within the groups should be identified and their key interests or drivers should be determined. Stakeholders in this group are often motivated by self-interest, and would need to be shown correlation between driving NEITI's agenda and pursuing their own. With regards to the National Assembly - a key member of this group - there is a need for NEITI to also liaise with the relevant Committee clerks and Technical Assistants to feed them with information on remediation issues as well as action points.
- 1.3 *Low Power/High Interest stakeholders:* these should be kept informed and monitored closely for changes in their influence.
- 1.4 *Low Power/Low Interest stakeholders:* these should also be provided with information to increase their interest levels, and should be monitored closely for changes in their power.
- 1.5 *High Distance Stakeholders that are key* should be managed more closely with consistent interface between NEITI staff and stakeholder groups. This can include cross-participation at organisational and personal functions to increase NEITI's visibility to these stakeholders.
- 1.6 *Beneficiaries of Change* - There is need to iterate the consequences of action or inaction by the Federal Government on remediation issues to citizens as well as guidance on specific next steps they can take to demand for greater accountability in resource governance.
- 1.7 *Beneficiaries of the Status Quo* should be presented with counter-narratives that show the impending potential cost of the maintenance of the status quo. There

is also a need to create incentives for reform that outweigh the benefits of the status quo, and disincentives for inaction by making political environment uncondusive.

- 1.8 *Advocates of Accountability and Good Governance* – NEITI can better engage with these stakeholders by publishing accurate and timely reports and by constant consultations with these stakeholders. This will help it build credibility with these stakeholders and keep them informed with reform efforts and successes.

Stakeholder Engagement Framework

Given the dynamism of political environments and the constant changes in the power and influence of key stakeholders, a stakeholder framework was provided to ensure continued, sustained and effective engagement of NEITI's key stakeholders. This framework is made up of engagement principles, processes, platforms and tools as well as internal capacity for stakeholder engagement. The diagram below outlines the framework.



Part of developing internal capacity to engage was the definition of roles and responsibilities for stakeholder management within NEITI. These roles include: Advisory Body on Stakeholder Engagement, Chief Engagement Manager, Stakeholder Engagement Coordinating Department, Key Relationship Owners, Key Relationship Advisors,

Departmental Stakeholder Representative, and all staff. Specific departments and staff have been assigned to these roles.

Given the foregoing, the recommended next steps for effective Stakeholder Engagement by NEITI include:

- i. Approval and adoption of the Stakeholder Analysis and Mapping Report by the NSWG
- ii. Development of action plan to implement the proposals and recommendations in the Report
- iii. Development of internal capacity to implement the Stakeholder Engagement Framework
- iv. Development of Stakeholder Engagement Plans for Stakeholders and Stakeholder Groups
- v. Development of a new Communication Strategy

In conclusion, this report complements NEITI's revised strategic plan and clearly outlines how NEITI can improve and sustain its stakeholder engagement efforts to better achieve its mandate of reversing the resource curse in Nigeria.

2. INTRODUCTION

NEITI was established by the NEITI Act of 2007 and has since conducted Fiscal, Monetary and Process Audits on the Extractives Sector in Nigeria. The success of these audits in identifying leakages in the extractives industry have not translated to success of remediation efforts towards blocking these leakages.

This translated into a new Theory of Change which necessitated a revised corporate strategy that, in turn, elicited the need for a new Stakeholder Engagement Framework. The end product of this process is a map of the critical industry actors and a plan to leverage their power in the Industry to achieve NEITI's mandate.

About NEITI

The Nigeria Extractive Industries Transparency Initiative (NEITI) is an agency of the Federal Government of Nigeria that was set up on the principles and concepts of the global Extractive Industries Transparency Initiative (EITI). The NEITI Act (2007) mandates the agency “to promote transparency and accountability in Nigeria’s extractive industries that drives sustainable socio-economic development and good corporate governance in Nigeria”.¹

Theory of Change

Guided by this mandate, NEITI developed its *Theory of Change* on the assumption that greater transparency leads to greater accountability which in turn leads to better governance and shared prosperity in Nigeria. This passive approach assumed that providing information (transparency) to the public on the payments and receipts of revenues from the extractive sector would lead to increased demand for accountable use of these revenues, which will in turn lead to good governance and shared prosperity.

¹ Mission: Nigeria Extractive Industries Transparency Initiative. Retrieved from <<http://www.neiti.gov.ng/index.php/aboutus/mission-vision>>

A critical review of NEITI's strategy² (in 2017) exposed weaknesses in the theory of change. NEITI's performance to date suggested the need to more effectively stimulate public accountability. The management of NEITI recognises that there is a valid causal link between transparency and accountability. However, NEITI recognises that equipping actors with relevant information is often insufficient to trigger, motivate, and sustain reform efforts. The imperative is therefore for NEITI to more actively participate in the process of driving greater transparency and accountability in the oil, gas and mining industries.

As a consequence, NEITI revised its Theory of Change to focus more on supporting *conditions* to translate transparency into accountability and to increase the effective utilisation of extractive revenues for equitable development and, in turn, address the resource curse. The revised Theory of Change takes into account a range of pathways and processes for translating empirical audit data to effectively leverage and institutionalise public accountability. The new Theory of Change outlines the four critical pathways to include:

- 1.9 Deepen openness in the extractive sector through regular and timely audit reports that present accurate and reliable data
- 1.10 Present the data and evidence in a focused and accessible manner to partners and platforms with the incentives and capacity to optimally advance public accountability
- 1.11 Deepen and broaden public understanding of the data to enable more meaningful public interrogation of the custodians of Nigeria's oil and gas and mining resources and revenues
- 1.12 Use the data from NEITI audits to advance pro-accountability policies and reforms by the Ministries, Departments, and Agencies (MDA)

Under this new Theory of Change, NEITI realised the need to understand and harness its relationship with a variety of stakeholders both within and outside the government. As a

² NEITI (2017). *Scaling Up Impact And Relevance: Nigeria Extractive Industries Transparency Initiative Strategic Plan (2017-2021)*

result, NEITI commissioned a holistic mapping and analysis of actors and stakeholders within its operational and strategic context. The project aims to provide the basis for a more strategic engagement with the various stakeholders, and to highlight opportunities for beneficial strategic partnerships that will be pivotal to the success of its work which is to reverse the resource curse in Nigeria.

Strategic Objectives

NEITI's revised strategy recognises that the goal of public accountability would be achieved through a deeper understanding of the connections and causality between the forms of transparency, and the need to focus the information on particular points in the institutional and public landscape. As a result, NEITI defined its four (4) Strategic Objectives (SOs) as follows:

- SO 1: Deepen openness in the extractive sector through timely audits and other impactful studies
- SO 2: Shape extractive sector and overall governance reforms through policy engagements, thought leadership and inter-agency coordination
- SO 3: Strengthen demand for accountability in the use of extractive revenues through strategic communication with critical stakeholders and empowerment of accountability actors
- SO 4: Increase operational capacity, legitimacy & support through effective financial, administrative and human resource management and adequate funding

Project Objectives

The NEITI Stakeholder Mapping and Analysis exercise recognises the need to identify relevant actors; evaluate their influence, interests, motivations, and expected roles; and devise means to influence them to play their expected roles. The core objectives of the exercise are to:

- Provide an annotated mapping of the key stakeholders implicated by, active in and/or crucial to extractive industries reforms in Nigeria, including those currently absent from NEITI's initiatives

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- Inform better understanding of blockages and resistance to implementation of NEITI recommendations
 - Outline corresponding strategic relationships with key stakeholders that are critical partners for the successful implementation of NEITI's Strategic Plan (2017- 2021)
 - Outline opportunities for more effective evidence uptake in policy reforms and the development impact of Nigeria's extractive industries, drawing where relevant from the experiences of other countries
 - Prepare a stakeholder engagement framework, in line with the core objectives of NEITI's developing Strategic Plan, to support better coordination and maximizes NEITI's influence towards achieving evidence-based reform.

3. LITERATURE REVIEW

A stakeholder analysis would enable NEITI achieve its strategic objectives as it allows a detailed understanding of the mandate, interest, and influence of its network of stakeholders, and the individuals who exercise real powers in the various organisations.

Literature review shows that political context mapping of which stakeholder mapping is a tool is crucial to the success of agencies looking to drive reform in a particular political environment.

A stakeholder mapping exercise enables an organisation to understand how best to interface with their various stakeholders to achieve an objective. This process dictates that the organisation should first understand its *raison d'être*, what it wants, have, and need, and then secondly, to understand the various stakeholders (individuals and corporations) that have an interest in or influence over the process the organisation must adopt to achieve its objectives. For instance, Court et al. (2006) found that the influence of Civil Society Organisations (CSOs) on policy has been limited as a result of their failure to take into consideration the political context of the policy reform they are advocating.³

A stakeholder map is a visual representation of the stakeholder analysis. It is used to clarify and categorise the various stakeholders identified by an organisation. The map is created by illustrating the various stakeholder groups, their interests, and the level of influence (or power) they have over the organisation. A stakeholder map also determines whether stakeholders represent inhibiting or supporting factors for an organisation to realize its objectives. Finally, it determines methods in which they should be dealt with.

Stakeholder analysis can be described as a tool for mapping the political context within which an organisation operates.⁴ Political context mapping is crucial for agencies that seek to influence policy and practice as the knowledge is critical to determine the effectiveness of particular strategies. Political context encompasses all aspects and variables of a

³ Court, J., E. Mendizabal, D. Osborne and J. Young (2006) *Policy Engagement: How Civil Society Can Be More Effective*, London: ODI.

⁴ Nash, R., Hudson, A., and Luttrell, C. (2006). *Mapping Political Context: A Toolkit for Civil Society Organisations*. Research and Policy in Development Programme. Available at <<https://www.odi.org/sites/odi.org.uk/files/odi-assets/publications-opinion-files/186.pdf>>

political environment that may influence the uptake of policy. These include elements such as the distribution of power, the range of organisations involved and their interest, and the rules that govern the interaction among the key actors.⁵

The logic of this intervention therefore presumes that a stakeholder analysis will allow NEITI achieve its set strategic objectives as it will allow a detailed understanding of the mandate, interest, and influence of its wide network of stakeholders, and the individuals who exercise real powers in the various organisations. This logic has been validated by the social science theory (Mitchell, Agle et al. 1997⁶; Fletcher, Guthrie et al. 2003⁷; Cameron, Crawley et al. 2010⁸; Savage, Nix et al. 1991⁹).

A review of NEITI's publications shed more light on its existing stakeholders and engagement strategies employed with these stakeholders. NEITI defines its stakeholders as individuals, organisations, or groups that can impact, or are impacted by, NEITI's mandate and activities. These stakeholders include suppliers, partners, consumers of NEITI's outputs, and governance entities. The comprehensive review of both proprietary and external literature on this subject matter provides the foundation for the stakeholder analysis process.

⁵ Ibid.

⁶ Mitchell, R.K., Agle, B.R., and Wood, D.J. (1997). *Toward a theory of stakeholder identification and salience: Defining the principle of who and what really counts*. Academy of Management Review. Available at: <http://amr.aom.org/content/22/4/853.short>

⁷ Fletcher, A., Guthrie, J., Steane, P., Roos, G., Pike, S. (2003) "Mapping stakeholder perceptions for a third sector organization", Journal of Intellectual Capital, Vol. 4 Issue: 4, pp.505-527, doi: 10.1108/14691930310504536

⁸ Cameron, B.G., Seher, T., Crawley, E.F. (2011). *Goals for space exploration based on stakeholder value network considerations*, Acta Astronautica, Vol. 68, Issues 11-12, June-July 2011, Pages 2088-2097

⁹ Grant T. Savage¹, Timothy W. Nix¹, Carlton J. Whitehead¹ and John D. Blair¹ (1991). *Strategies for assessing and managing organizational stakeholders. Perspectives*, Academy of Management Perspectives, February 1, 1991 vol. 5 no. 2 61-75

4. METHODOLOGY

The stakeholder analysis and mapping combined both primary and secondary methods of data collection with data validation exercises. These methods included: Document Review, Data Collection, One-on-One Interviews and Focus Group Discussions. The result is a comprehensive analysis of stakeholders and engagement strategies that will ensure that NEITI maximizes the benefits accruable to its stakeholders by virtue of their positions.

Approach to the Assignment

The project approach included a review of relevant NEITI documents, collation of data, interviews with key internal and external stakeholders, development of the initial stakeholder maps, focus group sessions to discuss the maps, and finalisation of the maps and engagement strategies.



Figure 1: Project Approach

Document Review: The stakeholder mapping process was kicked off with a review of relevant NEITI documents such as the 2007 NEITI Act, revised NEITI Strategy, NEITI Communications Strategy, NEITI Audit Process, previous NEITI Audit reports, and many other relevant documents. The purpose of this review was to inform a more comprehensive understanding of NEITI and its processes, and to provide an appropriate context or background to the stakeholder mapping process.

Data Collection: A number of templates were developed to collect data on and from key internal and external NEITI's stakeholders. These templates include:

- 1.13 **Stakeholder Identification and Mapping Form:** This form was administered to NEITI staff and was used in collecting data on the interest and influence of the current and potential stakeholders for each of the NEITI departments. The respondents provided their views and justification for scores of the stakeholders' interest, power, and distance. While the interest and power scores assess the influence the stakeholder has over NEITI's work, distance measures how closely NEITI currently manages the relationship.
- 1.14 **External Stakeholder Engagement Questionnaire:** This questionnaire was administered to NEITI's funders, audit partners, Board members and information suppliers.
- 1.15 **Citizens Survey:** This survey sought to assess the level of awareness of the average Nigerian of NEITI, its mandate, activities, and processes.
- 1.16 **Staff Survey:** This survey was administered to NEITI staff and sought to estimate their level of buy-in and engagement with NEITI's objectives.

One-on-One Interviews: In-person interviews were carried out with NEITI staff to discuss the input they provided on the Stakeholder Identification and Mapping Forms. These interviews with the various departments provided some context and background for the scores they assigned for the stakeholder power and interest matrix. Interviews were also conducted with representatives from some of the stakeholder groups to better understand their input on the External Stakeholder Engagement Questionnaire.

Draft Stakeholder Analysis and Mapping: Draft stakeholder maps were developed based on the information collected using the forms and questionnaires, and during the face-to-face interview sessions. This process resulted in a stakeholder map for NEITI (at the corporate level) and also individual stakeholder maps for the different departments.

Focus Group Discussion: A focus group discussion was organised with NEITI senior management staff to review the draft maps and validate the assigned scores. The session was attended by a cross section of NEITI management staff including Directors, Heads of Departments, and senior staffers.

Final Mapping and Engagement Strategy: The results of the various data gathering exercises were analysed and condensed into the final Stakeholder Map and Engagement Strategy for NEITI.

Limitations

A major constraint to the data gathering stage of this engagement was the unavailability of some external stakeholders for in-person meetings to explore their current engagement with NEITI and propose ways in which this engagement can be improved. The project team was, however, able to hold meetings with one representative from each stakeholder groups for Governance, Partners, Suppliers and Customers.

5. FINDINGS

The stakeholder analysis and mapping process has enumerated a detailed list of NEITI's stakeholders and this has been provided in the Appendix. NEITI's Communication Strategy – which is due for review – employed a number of stakeholder engagement methods. One-on-one validation meetings with representatives of key stakeholder groups (Governance, Partners and Suppliers) revealed stakeholder perspectives of NEITI.

The key recommendations from the various stakeholder groups can be summarised into the need for NEITI to be more proactive with its reform efforts, engage more strategically with key drivers of change, and to generally do more in its pursuit for good resource governance in Nigeria. A Citizen's Survey was also administered and revealed that although Citizens felt they had low power with regards to demanding for accountability in the Oil and Gas industry, it was suggested that NEITI could better engage with them by communicating its key messages more aggressively. NEITI staff also expressed, via survey, that NEITI's engagement with them as internal stakeholders could be improved with better communication, motivation and target setting. A general recommendation from all stakeholder groups was the need for NEITI to improve the timeliness of publication of its reports.

This in turn led to an assessment of the strengths and weaknesses of NEITI's previous stakeholder engagement efforts, most notably inadequate engagement with the Presidency and the National Assembly, and the absence of a framework for measuring, monitoring, tracking and rewarding stakeholder engagement efforts.

The data gathering exercises provided valuable insights into NEITI's current and potential stakeholders, the stakeholders' perspectives on how they could be better engaged by NEITI, and lessons learnt from past efforts at stakeholder engagement.

NEITI's Stakeholders

From their very beginning, EITI and subsequently its Nigerian chapter, NEITI, recognised the important role stakeholders and stakeholder engagements play in transparency and accountability in the extractive industry. Both the EITI and NEITI are coalitions of stakeholders. Key articles of the NEITI, such as NEITI Act 2007, the NEITI Handbook, and

the Communication Strategy (2012 – 2016) all directly or indirectly mention NEITI's stakeholder groups. It was, therefore, not difficult for the organisation to avail its list of current stakeholders. The detailed list of stakeholders is included as Appendix 1.

Stakeholder Engagement in the NEITI

The NEITI's communication and stakeholder engagement activities have been largely domiciled in the Communications Department and around communicating the importance, process and outcomes of NEITI audits in order to ensure sustained participation and action by the various stakeholders towards transparency and accountability. The strategy (according to the defunct Communication Plan) is described in four components: Awareness, Education, Insights, and Remediation.

The NEITI Communication Strategy employs several stakeholder engagement methods including:

1. Companies' Forum
2. The Inter-Ministerial Task Team
3. The Inter-Agency Task Team
4. Workshops (e.g. Template Workshop)
5. Courtesy Calls
6. Reporting Meetings¹⁰
7. The NEITI Website
8. Statutory meetings: Meetings and Retreats for the National Stakeholder Working Group
9. Reports
10. Bilateral meetings
11. Information dissemination through the media: news articles, features placement, TV and Radio appearances, media analysis, social media campaign and management, photo placements, in-depth interviews, etc.
12. Roundtables and capacity building for CSOs

¹⁰ These are meetings to report activities to stakeholders, especially Governance stakeholders.

13. Capacity building and sensitization of the media

14. NEITI Publications

The communication strategy also provides for road shows, documentaries and digital media plans.

Stakeholder Perspectives

Within the limitation of time, the project team engaged with select stakeholders using interviews and surveys. Responses were received from the following stakeholder groups:

1. National Stakeholders Working Group
2. Government Audit Partner: Office of the Auditor General of the Federation
3. Civil Society Organization
4. Development Partner
5. Citizens
6. NEITI Staff

The purpose of the engagement with these stakeholders was to validate NEITI's views on their level of influence, interests, and proximity (in terms of interaction with NEITI). In addition, the engagement was used to gain insight into the stakeholders' interests, motivations, and perspectives on how NEITI could better engage with them.

Highlights from the stakeholder perspectives are as follows:

National Stakeholders Working Group (NSWG):

- The NSWG works closely with NEITI
- However, there is inadequate grassroots penetration largely due to insufficiency in funding for NEITI and communication approach.
- There is need for NEITI to more actively engage with the Presidency and the National Assembly to drive reforms from the top.

Covered entity – Government:

- The Office of the Attorney General of the Federation closely collaborates with NEITI.
- However, there are expressed concerns with the timeliness of NEITI Audit reports.

- There is need to further demystify or provide more transparency on the inner workings of NNPC. NEITI has the powers to accomplish this objective.

Development Partner and Civil Society Organisations:

- 1.17 NEITI closely collaborates with development agencies and civil society organisations.
- 1.18 However, they feel that NEITI could become more impactful in its efforts to drive reform in the sector. For instance, there is need to bolster the capacity of NEITI Communications Department:
 - To make the reports more meaningful by iterating the implications of findings in each audit year.
 - To reproduce key messages in the audit report for unique stakeholder groups
- 1.19 There is need to recast, refresh, and communicate a more profound message than the perceived repetition of findings year after year.
- 1.20 There is need to quickly establish the Policy Unit to provide inputs and materials for evidence-based advocacy.
- 1.21 NEITI needs to set performance targets for its staff to motivate and incentivise more result-oriented engagement with key stakeholders such as the National Assembly.
- 1.22 NEITI needs to be more targeted in its approach to engaging stakeholders and resolving identified issues.

Citizens (total of 82 respondents from 15 cities):

The project team received 82 responses from a Citizen's Survey administered via Facebook. The following results were realised from the survey:

- 1.23 51 percent know about NEITI and what it does
- 1.24 Most of those got to know about the NEITI through newspapers (43 percent), television (11 percent), social media (33 percent) and radio (2 percent). Others were through books (e.g. Economics textbook), offering professional services, and studies.

- 1.25 51 percent rated their understanding of the extractive industry as fairly good/good, while 49 percent rated it as poor/very poor.
- 1.26 96 percent agree that it is important to hold public officers accountable in Nigeria's extractive industry, and 81 percent think Nigeria's natural resources were poorly managed.
- 1.27 73 percent believe citizens have little or no power to ensure accountability and transparency in the oil and gas industry.
- 1.28 29 percent agree NEITI has been somewhat effective in providing transparency in Nigeria's extractive industry (i.e. oil and gas, and mining). 24 percent say it has not been effective, while 47 percent do not have an opinion.
- 1.29 Although 86 percent stated that they have taken no action towards demanding accountability and transparency in the extractive industry, they recommended actions citizens should take to demand transparency. These include:
 - Engaging the government through their various representatives at the National Assembly
 - Participating in elections
 - Taking civil action
 - Becoming more aware of issues in the industries
 - Mobilising, organising, and educating others to make their voices heard
 - Social media advocacy
 - Issue-based advocacy
- 1.30 Suggested actions for the NEITI to better engage citizens include:
 - Work with law enforcement, and take legal action against defaulters
 - Give account on a monthly basis of their activities
 - More vigorous mass communication and social media campaigns (e.g. as EFCC does)
 - Timely publication of findings.

Staff (total of 20 respondents):

- 1.31 They all understand what the NEITI does and how it operates fairly well (5 percent), to a large extent (55 percent) or very much (40 percent)

- 1.32 90 percent rated their understanding of the oil and gas, and mining industries as fairly good (30 percent) or very good / excellent (65 percent)
- 1.33 75 percent believe the NEITI has been effective (55 percent) or very effective (20 percent) in promoting transparency and accountability in Nigeria's extractive industry. 25 percent believe NEITI has been somewhat effective
- 1.34 To demonstrate commitment and understanding, 95 percent have read the NEITI Act and handbook, 75 percent the Strategic Plan, 80 percent the EITI Standard, and 55 percent the NEITI Oil and Gas Report 2014
- 1.35 All respondents believe they are passionate (55 percent), very interested (40 percent) or at least interested (5 percent) in NEITI's mission
- 1.36 However, 70 percent of respondents believe NEITI staff are very committed to achieving NEITI's objectives; 25 percent believe staff are somewhat committed, 5 percent believe staff are just earning their pay, and none believed NEITI staff are passionate about its objectives.
- 1.37 Suggestions on ways that the NEITI could better engage staff include (number of mentions in parenthesis):
 - training and retraining including mentorship and in-house capacity building (7)
 - carrying them along in every step of the long journey of NEITI Regular briefings (5)
 - proper staff motivation (4)
 - fairness and transparency (3)
 - more involvement in NEITI activities and departments e.g data collection, dissemination work (3)
 - giving room for creativity (2)
 - valuing teamwork (1)
 - be a bit more strategic in the way it manages staff (1)
 - leadership by example on the part of management and senior staff (1)
 - target setting, rewards and sanctions (1)
 - reiterating the core values, mission and vision (1)
 - delegation of responsibilities to sub-ordinates (1)
 - achieving the NEITI mandate (1)

Interview notes and completed surveys are provided in Appendix 2.

Strengths, Weaknesses and Lessons Learnt

The table below outlines an assessment of NEITI's strengths (which the organisation should continue to leverage on) and areas to improve upon in its stakeholder engagement in the context of the new NEITI strategic plan.

Table 1: Key Strengths and Weaknesses in NEITI Stakeholder Engagement

Strengths	Weaknesses
1. Close working relationship with, and very active and effective use of the media 2. Close working relationships with Civil Society Organisations, NSWG, EITI, IATT, NEITI Auditors, key Development Partners/Donors, OAGF, Companies' Forum 3. Development of a Communications Strategy	1. Limited engagement with the Presidency and NASS 2. No framework for defining measures, tracking, monitoring and rewarding performance in stakeholder engagement 3. Stakeholder Engagement is seen as the responsibility of the Executive Secretary and Communication Department and not as the responsibility of all.

Clearly, the Communication Strategy that has guided stakeholder engagement efforts so far (and is now due for review) would be inadequate to implement the new NEITI strategy. Stakeholder engagement would need to move beyond pushing out information to more strategic and targeted relationship building, engagement, collaboration and empowerment efforts.

6. STAKEHOLDER ANALYSIS AND MAPPING

This section presents analysis and maps of the NEITI stakeholders. Stakeholders have been mapped by; the roles they play in NEITI's processes, interest and influence, distance, strategic objective, 'owner' department, commitment and common interests. Assigned positions of key stakeholders in various maps would determine the engagement strategies to be employed in managing them.

Several NEITI stakeholders were identified using the proposed methodology. For ease of understanding and to develop effective stakeholder engagement strategies, these stakeholders were categorised using the following perspectives:

- a. By role in the NEITI processes
- b. By interest and influence
- c. By distance
- d. By strategic objective
- e. By 'owner' department
- f. By commitment
- g. By common interests

NEITI Stakeholders By Role

This section presents the various stakeholder groups by the roles they play in the NEITI process using the G-SIPOC Model (Governance, Supplier, Input, Process, Output, and Customer). This categorisation helps to shape the kind of information to be shared and engagement tools to be deployed with a stakeholder, as reflected in the Engagement Strategy.

The NEITI's stakeholders groups by role is presented in Fig. 2. Each role is subsequently explained.

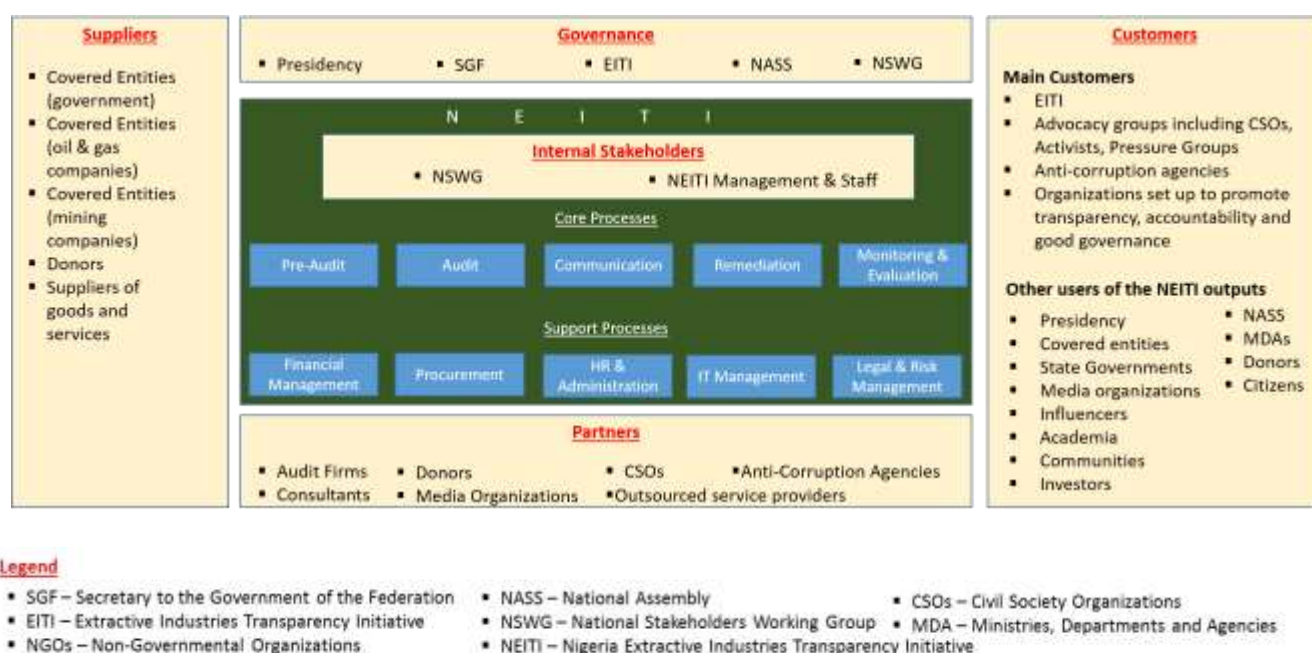


Figure 2: NEITI Stakeholder Groups by G-SIPOC Categorisation

Governance Stakeholders

Stakeholders in the governance role are accountable for the ultimate success or failure of the NEITI. They provide oversight, appropriation of resources, guiding rules and performance standards to the NEITI. Some of these governance stakeholders include The Presidency, Office of the Secretary to the Government of the Federation, the National Assembly, Extractive Industries Transparency Initiative, etc.

Suppliers

The stakeholders categorised as suppliers provide the input used in the NEITI processes. These resources primarily include information to carry out NEITI's core audit processes as well as goods and services to perform the support processes. Some of the suppliers include the covered entities in government, oil and gas sector, mining sector, development agencies/ programmes, etc.

Partners

The stakeholders in this category join up with the NEITI to perform one or more of its core and/or support processes. Some of the partners include audit firms, media, civil society organisations, anti-corruption agencies, etc.

Customers

These are entities that use NEITI's output, such as Audit Reports, Policy Briefs, and other data and information, to achieve their own objectives. For proper analysis, this group was further segmented into Main Customers and Others. NEITI's main customers are those whose core mission is to promote accountability, transparency and good governance. As such, NEITI's output is critical to their mission. Other customers are those who use NEITI's outputs, but were not set up to promote accountability and transparency as their core mission. As such, NEITI's outputs are not necessarily mission-critical for them.

Internal Stakeholders

These are stakeholders that are essential components of NEITI and are accountable for its outputs. Essentially, these are the NSWG and NEITI staff.

The stakeholders in the above-mentioned categories have varying levels of influence over NEITI and its objectives. Likewise, they have different levels of interests (expressed and hidden), some of which do not necessarily align with NEITI's core mandate. Hence, there is a need for further analysis of the stakeholders as discussed in subsequent subsections of this report.

NEITI Stakeholders by Interest and Influence/Power

This section presents NEITI's stakeholder groups by their relative influence over its processes and objectives, and by their level of interest. *Influence* or power represents the amount of resources at the disposal of the stakeholder to impact NEITI and its objectives.

Interest represents the stakeholder's level of willingness to deploy those resources for or against the achievement of NEITI's objectives.

The NEITI Stakeholder Map (Fig. 3) represents the stakeholder interest-influence matrix. The scores are based on research and engagements with NEITI and some of its stakeholders. Departmental maps have been provided in Appendix 3.

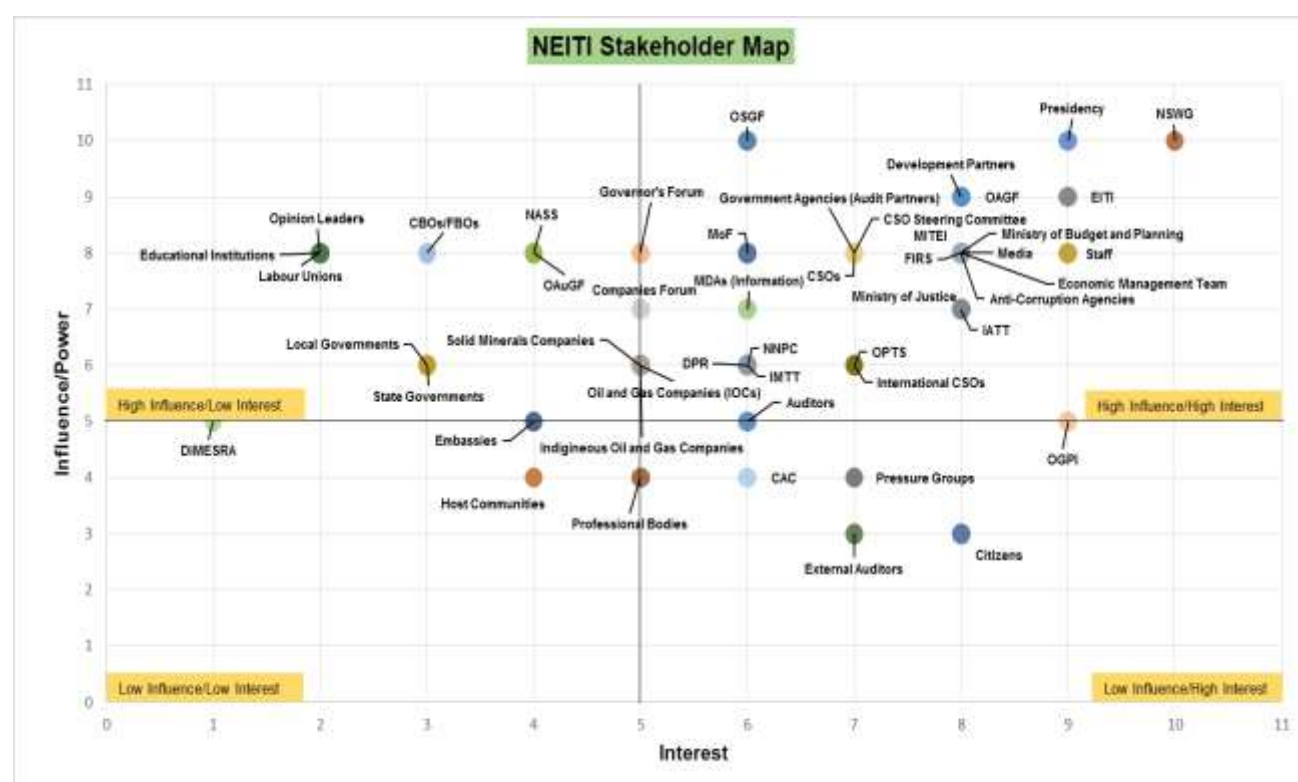


Figure 3: NEITI Stakeholder by Interest and Influence

The Interest-Influence categorisation is important because it helps NEITI determine who its key stakeholders are and how to devote its resources to manage those relationships. NEITI has finite resources (of time, finances, people, etc.); hence it must devote its resources to its most critical stakeholders (high interest/high influence).

High Interest / High influence Stakeholders

These are stakeholders with high interest and influence regarding NEITI and its objectives. These organizations include those that perform governance roles over NEITI, covered entities, government's anti-corruption agencies, policy-making MDAs in the extractive

industry, high-power influencers such as media organisations and Civil Society Organizations, and donor organisations. The donor organisations are very critical to NEITI because they provide resource support for NEITI's activities. Majority of the NEITI's key stakeholders are drawn from this group. As a result, NEITI needs to manage them closely to understand and influence them towards a net positive impact on its objectives.

High Influence / Low Interest Stakeholders

These are stakeholders with relatively high-power over NEITI but have a correspondingly low interest in NEITI's objectives or activities. Their current influence over NEITI's outcomes is, therefore, currently latent; however, they can become active immediately their interest increases. Consequently, NEITI has an opportunity to work on engaging and aligning the interest of these stakeholders towards its objectives.

The National Assembly, State Governments and other key influencers in Nigeria fall within this category. An immediate stakeholder engagement imperative for the NEITI is to manage the interest of these entities so they can devote their resources to advancing transparency and accountability in Nigeria's extractive industries.

Low Influence / High Interest Stakeholders

These are stakeholders with currently low influence but high interest in NEITI's mandate and objectives. Nigerians are a major component of this category. The prevailing perspective is that Nigerians have low power to effect real change in governance and greater transparency and accountability in the extractive industry (see Appendix 2). However, this power can significantly increase improvements in Nigeria's democratic systems (such as the electoral and judicial processes). Nigerians need to be empowered with more information and knowledge.

Low Influence / Low Interest Stakeholders

These are low-power stakeholders with relatively low interest in NEITI and its objectives at present. The communities where these extractive resources are mined (host communities) are within this category. Like citizens (discussed above), their power could

be enhanced through improved access to information and knowledge, and also through improvements in the electoral processes.

NEITI Stakeholders by Distance

Whilst the perspective of stakeholders by Power/Interest enables NEITI determine its key stakeholders (high power/high interest), stakeholder mapping by distance enables the organisation to determine which stakeholder requires its immediate attention. The Power/Interest map suggests that key stakeholders should be closely managed while the distance map shows how closely they should be managed. This map depicts the proposed frequency of contact and how cordial the relationship should be. The NEITI's current stakeholder distance map (Fig. 4) suggests that a number of high power stakeholders, including the Presidency, National Assembly, anti-corruption agencies, and international civil society organisation, need to be managed more closely.

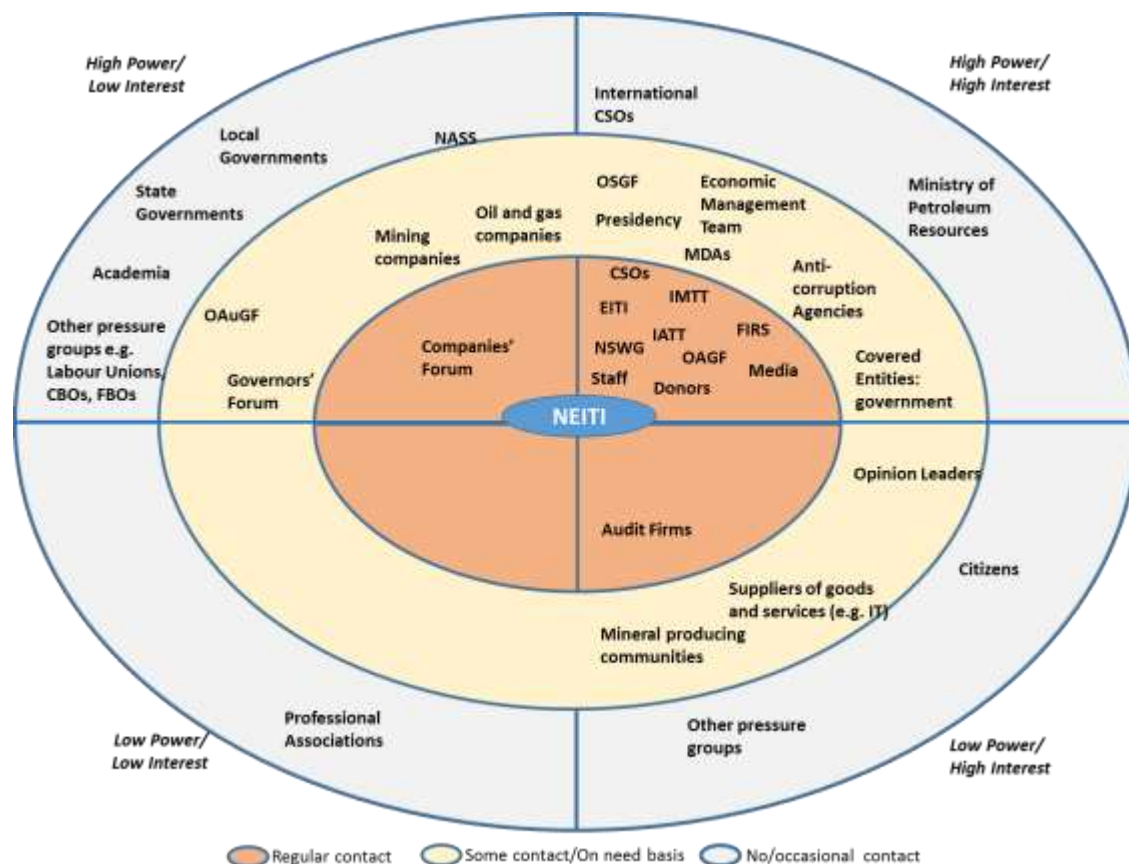


Figure 4: NEITI Stakeholder Map by Distance

NEITI Stakeholders by Objective

The new strategic plan of NEITI contains four (4) strategic objectives as enumerated earlier in this report. The stakeholder map in Fig. 5 shows NEITI stakeholders presented according to their relevance to each of the strategic objectives. This map would help NEITI identify the respective stakeholders to work with as it pursues the various objectives. Some stakeholders, such as donors, appear in multiple quadrants as they are relevant to multiple objectives.

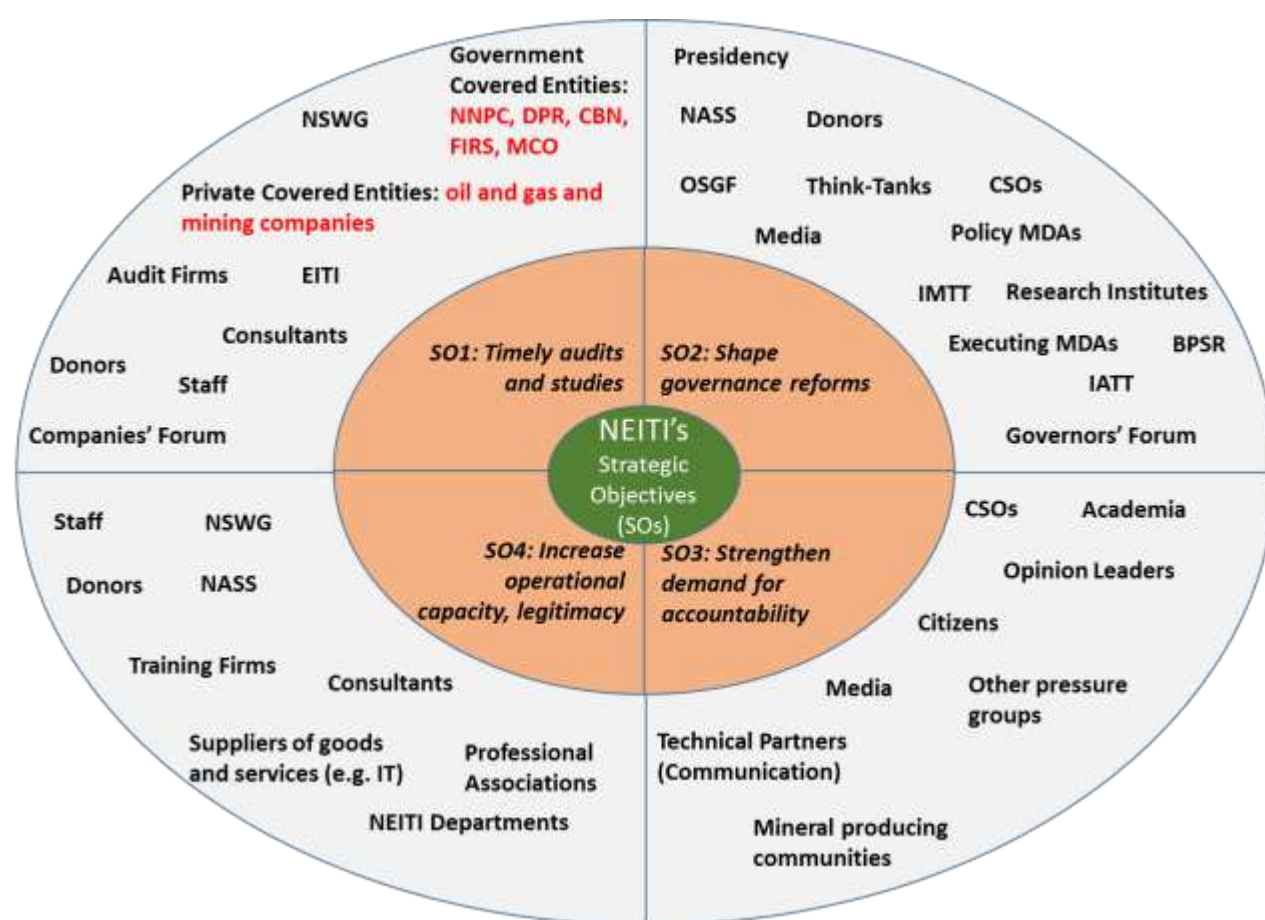


Figure 5: NEITI Stakeholder Map by Strategic Objectives

NEITI Stakeholders by 'Owner' Department

This stakeholder map presents the NEITI stakeholders by 'owner departments'. The 'owner' department is the department, which by its function, is best positioned to lead or coordinate primary engagement with a particular stakeholder. In the Engagement Strategy, the 'owner department' will manage or facilitate the stakeholder relationship on

behalf of NEITI. The stakeholder map in Fig. 6 shows NEITI's stakeholders by 'owner' department.

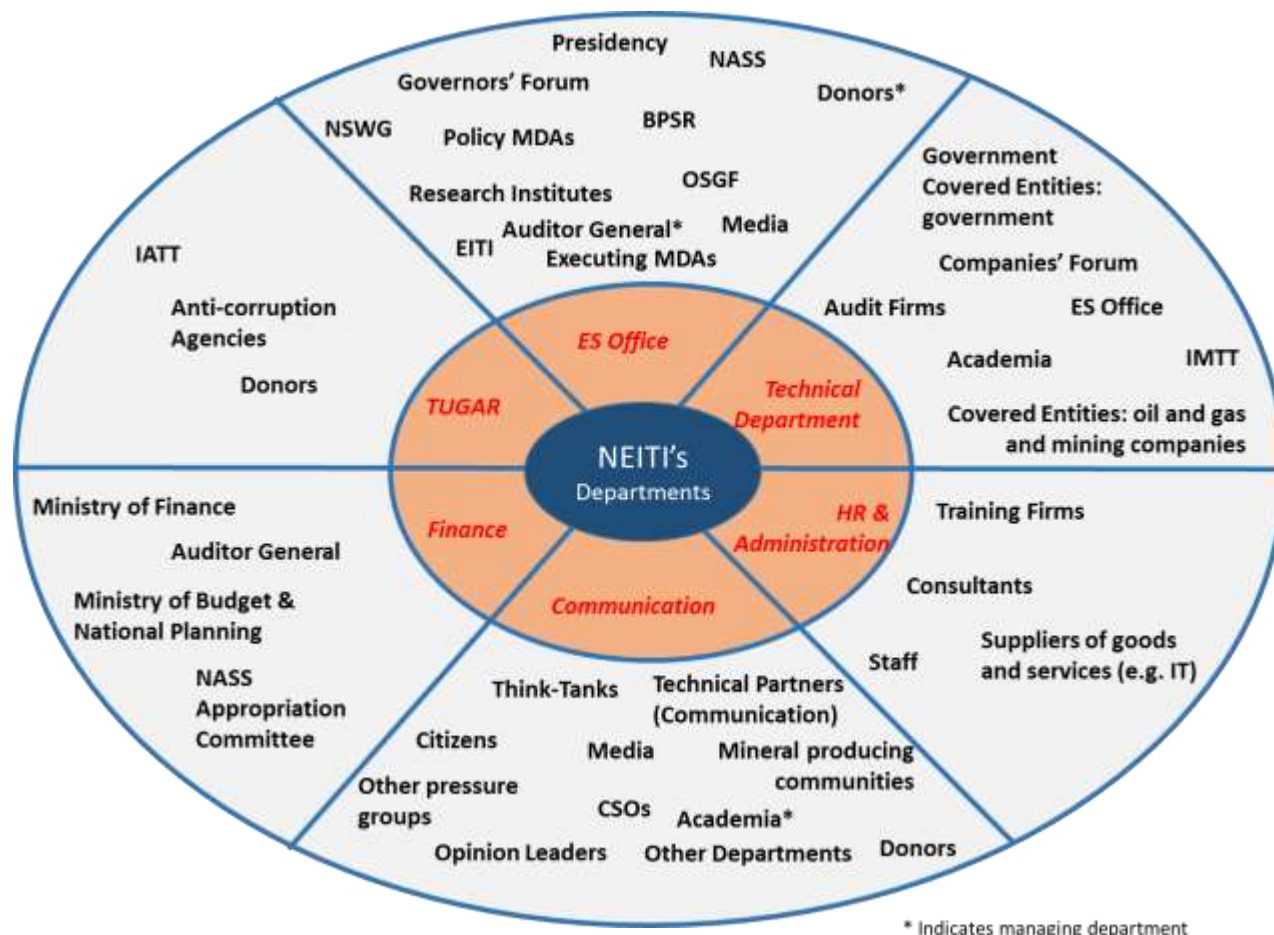


Figure 6: NEITI Stakeholders by "Owner Department"

NEITI Stakeholders by Commitment

This stakeholder map presents the NEITI stakeholders by commitment. NEITI's stakeholders have been placed at various stages on the Commitment slope – from Awareness to Ownership. The placement of high power stakeholders along the slope will determine specific engagement strategies to be used to move them up on the slope. The stakeholder map in Fig. 7 shows NEITI's stakeholders by commitment.

Commitment Stages

Awareness: Stakeholder becomes aware of the change and a vision of the future is introduced.

Understanding: Stakeholder can explain the impact of the change on themselves and on the country.

Acceptance: Stakeholder has a positive attitude regarding the change and can ‘see themselves’ in the new state. They begin to feel accountable for making it happen.

Buy-in to Ownership: Stakeholder champions the change, taking accountability and ownership for the success of the transformation.

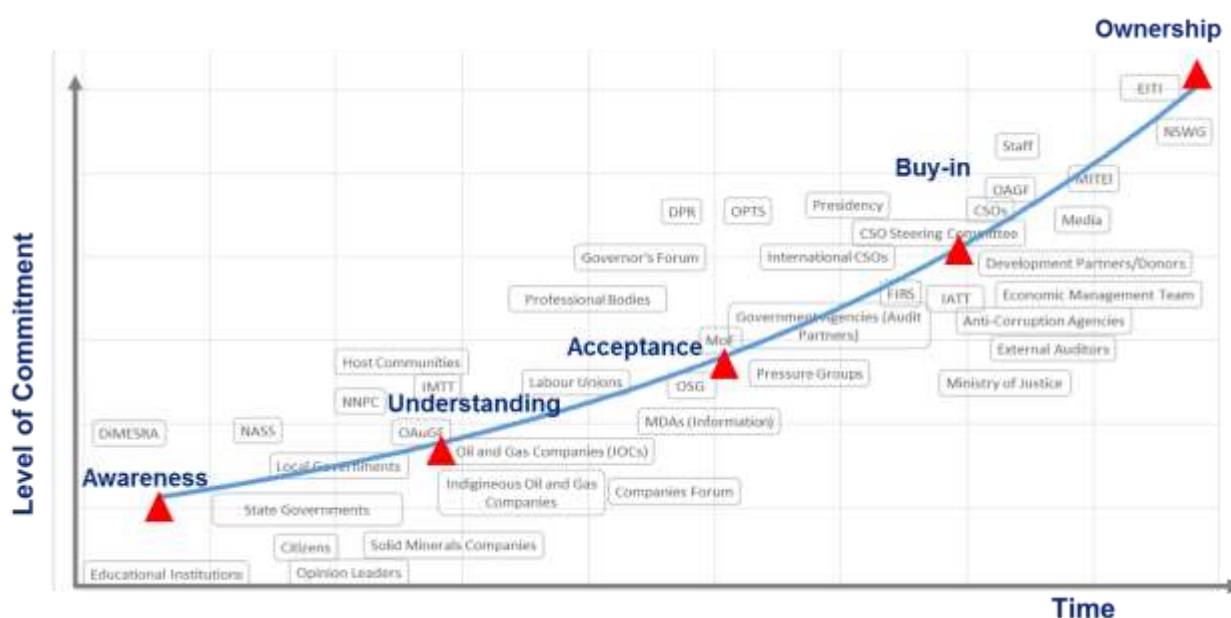


Figure 7: NEITI Stakeholder Map by Commitment

NEITI Stakeholders by Common Interest

The commonly asserted dictum about permanent interests and temporary associations is relevant to stakeholder analysis and management. Whilst the Power/Interest grid measures the relative interest of stakeholders, it does not indicate the nature of these interests, which may or may not favour the cause of the NEITI. The perspective that views stakeholders by interest is a result of analysing the nature of stakeholder interests and identifying commonalities so that engagement strategies can be focused.

Based on our analysis of the NEITI's stakeholders, seven (7) interest groups emerge as follows:

1. Elected officials
2. Government/political appointees
3. Advocates of transparency, accountability and good governance
4. Professionals
5. Beneficiaries/guardians of status quo
6. Beneficiaries of change/transparency and accountability
7. Beneficiaries of NEITI's administrative procedures

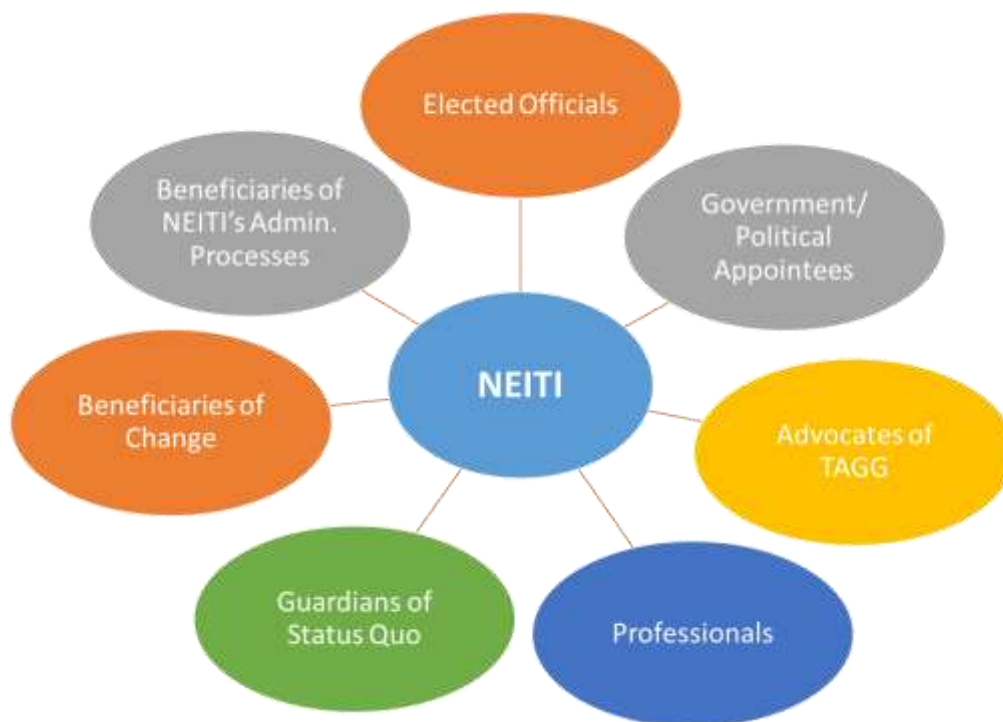


Figure 8: NEITI Stakeholder Map Common Interest

The common interests and motivations of these groups are presented in Table 2:

Table 2: Stakeholder Groups and Interests

STAKEHOLDER GROUP/ MEMBERS	INTERESTS AND MOTIVATIONS
Elected officials These include: a. President b. National Assembly c. State Governors d. Local Government Chairmen	Elected officials generally have the following expressed or hidden interests: i. Rewarding their constituencies (those who helped to put them in power) ii. Seeking reelection or otherwise perpetuation of power post-termination of tenure iii. Protection of their positions from real and perceived enemies iv. Recognition for achievements (colloquially referred to as “Bragging Rights”) and tools to decimate opposition v. Serving the interests of ‘the masses’ vi. Delivering election promises vii. Recognition and due respect viii. Personal gains including official and non-official perquisites Consequently, they are motivated by anything that would serve the above interests and would likely move against anything that would hurt them. Members of this stakeholder group also have their unique interests. For example, the current President and Vice President of Nigeria, together with few other elected officials have openly asserted and demonstrated their stance against corruption. Also, the National Assembly is interested in things that would help them perform their oversight function and that of checking the Executive and Judiciary arms of government.

STAKEHOLDER GROUP/ MEMBERS	INTERESTS AND MOTIVATIONS
Government appointees These are the leaders of government agencies such as the: a. Group Managing Director, NNPC b. Attorney General of the Federation c. Chairman, Federal Internal Revenue Service d. Governor of the Central Bank of Nigeria e. Heads of other government covered entities	Government appointees are usually employed to achieve specific purposes of the administration, including a change in the organization they are chosen to head. They are generally interested in the following (expressed or hidden) issues: i. Demonstrating good performance (which could be performing or just signaling performance) and living up to expectations ii. Loyalty to those who appointed them (and/or who helped them get the appointment, where lobbying was involved) iii. Protection of their positions from real and perceived enemies iv. Seeking re-appointment at the end of their tenures v. Making the current administration look good vi. Recognition vii. (In many cases) Personal gains including official and non-official perquisites viii. (In some cases) self-promotion
Political appointees These are other government appointees such as board members of government agencies including the NEITI	The Nigerian experience has been that most political appointees are chosen on the basis of party loyalty or as reward for the same. This has some bearing on their interests and motivations. Political appointees are generally interested in the following (expressed or hidden) issues: i. Personal gains including official and non-official perquisites ii. Self-aggrandizement

STAKEHOLDER GROUP/ MEMBERS	INTERESTS AND MOTIVATIONS
	iii. Loyalty to those who appointed them (and/or who they get the appointment, where lobbying was involved) iv. Good performance of their organizations (which could be performing or just signaling performance) v. Seeking re-appointment at the end of their tenures vi. Recognition
Advocates of transparency, accountability and good governance • Development Partners/ Donors • EITI • CSOs • Transparency and accountability activists • Other pressure groups	These stakeholders are interested in Transparency, Accountability and Good Governance
Professionals • The Media • Professional associations	These stakeholders are interested in performing the duties demanded by their professional callings. They are therefore motivated by issues that would help them fulfil that calling.
Beneficiaries/Guardians of Status Quo Stakeholders that are the proposed subject of	The status quo and demonstrating the reasons why change is not feasible.

STAKEHOLDER GROUP/ MEMBERS	INTERESTS AND MOTIVATIONS
change e.g. NNPC and some covered entities in oil and gas and mining.	
Beneficiaries of Change/Transparency and Accountability These are intended direct beneficiaries of NEITI, primarily the citizens of Nigeria	Citizens are interested in: • Improved welfare and standard of living • Better governance and use of common resources
Beneficiaries of NEITI's Administrative Procedures These include: • NEITI staff • Suppliers of good and services to NEITI • NEITI Consultants • NEITI Auditors	The interests of this group include: • Acceptable conditions of engagement • NEITI as good corporate citizen • Clear specification of deliverables • NEITI living up to its side of the bargain

7. STAKEHOLDER ENGAGEMENT STRATEGIES AND FRAMEWORK

This section discusses proposed stakeholder engagement strategies for the NEITI based on the analyses and mappings presented in preceding sections. General stakeholder engagement strategies have been enumerated. The strategies are specific actions and positioning by the NEITI that should influence its stakeholders to act in favour of its objectives. The section also presents a stakeholder engagement framework that will help the NEITI effectively engage and manage its stakeholders in the future.

The NEITI Stakeholder Engagement Strategies

The goal of the NEITI's stakeholder engagement is to influence stakeholders to play the part NEITI wants them to play by giving them compelling reasons to act. This would involve moving respective stakeholders along the commitment journey from awareness to ownership. The effectiveness of the strategies can be measured by an assessment of movement along the journey (i.e. baseline position vs. current position).

The proposed strategies are based on our understanding of the current situation. Specific strategies for stakeholder groups and stakeholders should change once the stakeholder's circumstances change significantly. Continuous stakeholder scanning, as recommended in the Stakeholder Engagement Framework is thus required.

General Engagement Strategies for All Stakeholders

1. Clearly define the actions required from each stakeholder / stakeholder group as well as their next milestone on the commitment journey. Stakeholder engagements should revolve around getting traction on those actions.
2. Make provisional budget for activities to meet the needs of stakeholders as much as is legally within NEITI's means, prioritizing the needs of key stakeholders.
3. Designate key relationship managers for each stakeholder group and each key stakeholder. The functions of key relationship managers are provided in Section 6.2.

4. Ensure the new communication strategy crafts messages that clearly state the action desired from stakeholders and their engagement objective(s). The messages should also be tuned to their respective interests, stating clearly their WIIFMs (What is in for me) based on insights into their interests and motivations at that time.
5. Ensure that all communication to stakeholders across all touch points resonates with and reinforces the messages crafted for that stakeholder.
6. Stakeholder engagement should be dynamic and responsive to changes in the operating environment. Constant environmental scanning is required to adapt the strategy and leverage changes as windows of opportunity. For example change of leadership at a government agency presents an opportunity for NEITI to reassert the NEITI imperatives for that agency and strengthen alliance with the organization.
7. Skillfully leverage emerging threats and other burning issues to push agenda for greater accountability and better management of resources. Threats could be related to state security, economy, or political competition. An example is the recent crash in oil prices and ensuing recession of the economy.

The table below presents the specific strategies proposed for stakeholder groups and some key stakeholders.

Table 3: Stakeholder Engagement Strategies

#	Stakeholder Group	Members	Strategies
1.	High Power / High Interest Stakeholders	NSWG, Presidency, Development Partners, OAGF, EITI, Economic Management Team, Ministry of Budget and Planning, IATT, Anti-Corruption Agencies, IMTT.	The specific objectives of the engagement are: - to deepen understanding of their interests and motives - to influence their beliefs and thinking - to empathize with their interests - to move them to the next respective milestone in the commitment journey Recommended strategies include: - Periodic formal or informal individual contact between the NEITI board and management and the stakeholder's top leadership. Such contact could be a phone call, a social event/call, a courtesy visit (required for first-time contacts). The frequency of contact would both be issue-driven and non-issue-driven. - Designation of key relationship managers within NEITI for each of the stakeholders in this category. The responsibilities of the key relationship managers are provided in Section 6.2 (Roles and Responsibilities)
		All elected officials	The specific objectives of the engagement are: - to deepen understanding of NEITI functions, processes and activities. - to secure buy-in and ownership of NEITI remediation issues.

#	Stakeholder Group	Members	Strategies
			3. to empathize with their interests 4. to communicate clear and feasible courses of actions within their unique political environment. Recommended Strategies include: 1. Constant monitoring of interests as they change. 2. Determine incentives and disincentives for identified individuals that can trigger and sustain their drive for reform. 3. Capitalize on newly elected leaders by presenting them with the NEITI Agenda for their organizations early in their tenure.
		Presidency	The specific objectives of the engagement with the Presidency include: a. to secure political support/will for NEITI and its mandate at the highest level of Government b. to secure buy-in and ownership of NEITI industry audit reports and its recommendations c. to cause actions to be taken by MDAs and companies to implement remedial issues in the NEITI reports d. To align the Remedial issues in NEITI Reports to FGN policy reform agenda.

#	Stakeholder Group	Members	Strategies
			Recommended Strategies include: 1. Seek audience with Presidency using SGF 2. Brief the Presidency on NEITI Mandate 3. Distill findings of report into immediate actionable points for Presidency, while iterating outcomes of inaction. 4. Constant interface with the Presidency for increased visibility of NEITI and increased awareness of issues.
		Political/Government Appointees	The specific objectives of the engagement includes to trigger the need for optics of good performance by presenting NEITI Agenda. Recommended Strategies include: 1. Timely approach of political appointees (immediately after they are appointed) 2. Distill findings of report into immediate actionable points within the context of their political environment, while iterating outcomes of inaction. 3. Constant interface with the appointees for increased visibility of NEITI and increased awareness of issues.

#	Stakeholder Group	Members	Strategies
2.	High Power / Low Interest Stakeholders		If managed properly, these stakeholders may form the basis of an interest group or coalition that can lobby for change. Cultivate and align their interest by doing the following: 1. Identify potential reform champions within the stakeholder groups. 2. Catalogue the interests of these individuals and prepare compelling narrative on how NEITI's interests can help serve theirs. 3. Offer to accommodate or meet their needs in legitimate ways. The key driver for most individuals in this group is self-interest.
		National Assembly	The specific objectives of the engagement are: • To secure legislative support for NEITI and its mandate e.g. through appropriation • to secure buy-in and ownership of NEITI industry audit reports and its recommendations • to cause actions to be taken by MDAs and companies to implement remedial issues in the NEITI reports through legislative oversight • to deepen NEITI understanding of Legislators' interests, motives, key influencers and access routes Recommended Strategies include:

#	Stakeholder Group	Members	Strategies
			1. Profile leaders and members of the Senate and the House of Representatives to identify potential champions of reform. 2. Determine incentives and disincentives for identified individuals that can trigger and sustain their drive for reform. 3. Liaise with relevant Committee clerks and Technical Assistants and provide constant information on remediation issues, coupled with specific action points. 4. Constant interface with NASS for increased visibility of NEITI and increased awareness of issues. In addition: 1.38 The National Assembly may understand the key issues raised by NEITI report, but are missing key action points.
3.	Low Power/High Interest Stakeholders	Citizens, Auditors, External Pressure Groups.	These stakeholders should be kept informed and should be monitored closely for changes in their power/influence.
4.	Low Power/Low Interest Stakeholders	Host Communities	Recommended Strategies include: 1. Provision of information to increase their interest in NEITI objectives. 2. Close monitoring of stakeholder groups for changes in power/influence.

#	Stakeholder Group	Members	Strategies
5.	High Distance Stakeholders	International CSOs, Local Governments, NASS, State Governments, Academia, Pressure Groups, Citizens, Professional Organisations.	Recommended Strategies include: 1. High distance stakeholders with high power should be managed more closely with consistent interface between NEITI staff and stakeholder groups. 2. Interface can include cross-participation in functions, and constant communication of NEITI Audit reports findings and policy briefs in formats that are useful and relevant to specific stakeholder groups.
6.	Beneficiaries of Change	Citizens/State and Local Governments	Recommended Strategies include: 1. Iteration of information in audit reports with objective of effectively communicating impact of action or inaction on remediation to citizens 2. Outline of specific 'next steps' or courses of action citizens can take 3. Provision of tools for demanding change
7.	Beneficiaries of Status Quo	Covered Entities	Recommended Strategies include: 1. Counter-narratives of favourable status-quo should be created with the objective of showing potential cost of maintaining the status-quo. 2. Other stakeholders more aligned with NEITI's interests can be used to make political environment for these beneficiaries uncondusive

#	Stakeholder Group	Members	Strategies
			3. NEITI can work with partners to create incentives for reform that outweigh benefits of status quo in real terms
8.	Advocates of Accountability and Good Governance	Development Partners, International CSOs	Recommended Strategies include: 2. Build credibility of NEITI by producing accurate, timely and clear reports. 3. Constant consultations or soliciting of feedback and guidance 4. Keep informed with reform efforts and publicise successes

Stakeholder Engagement Framework

The proposed Stakeholder Engagement Framework for the NEITI would support better stakeholder engagement and influence stakeholders towards evidence-based reform. The Framework comprises elements that would institutionalize stakeholder engagement in NEITI.

The purpose of the Framework is to put a structure around how NEITI should best engage stakeholders to achieve its ultimate objective of reversal of resource curse. Its objectives are to:

1. engender coherency and consistency in NEITI's approach to each stakeholder; and
2. ensure responsible parties are clear about their roles in stakeholder engagement.

The ultimate goal of stakeholder engagement is to get each stakeholder to play its own part by giving them a compelling reason to act in favor of NEITI's cause.

The elements of the NEITI's Stakeholder Engagement Framework are:

1. Engagement Principles
2. Engagement Process
3. Engagement Platforms and Tools
4. Internal Capacity for Stakeholder Engagement

Stakeholder Engagement Principles

It is important that stakeholder engagement efforts and activities are guided by established principles. We propose the following principles which are aligned to internationally adopted principles¹¹ and as well as NEITI's strategic goal to "be an active and effective facilitator of the reversal of the effects of resource curse in Nigeria":

¹¹ The National Coalition for Dialogue and Deliberation, the International Association for Public Participation, and the Co-Intelligence Institute. 2009. Core Principles for Public Engagement. P.3. <http://ncdd.org/rc/wp-content/uploads/2010/08/PEPfinal-expanded.pdf>

1. **Transparency and Trust:** the NEITI stands for transparency and accountability and would be a model organization for these. Therefore all its dealings with stakeholders will be transparent and legally defensible. The NEITI will continue to be clear and open about its process, and (without violating contractual obligations) provide a public record of the organizers, sponsors, outcomes, and range of views and ideas expressed. Staff of the NEITI will demonstrate respect, courtesy and professionalism at all stakeholder touch points in the NEITI processes.
2. **Careful Planning and Preparation:** Stakeholder engagement will be planned and deliberate. A NEITI Stakeholder Engagement Plan will be developed by stakeholder engagement managers (See Template in Appendix 4) to guide engagement actions for the year and form an input into the Communication plan. Communication messages will use language that is appropriate for the target audience and provide summaries of key issues and of the impacts of decisions.
3. **Inclusion, Collaboration and Shared Purpose:** the NEITI would ensure the involvement of all stakeholders that should be part of a conversation or event. It would continually seek common ground and support and encourage participants to work together to advance the common good. The NEITI will continually identify and understand the interests and motivations of stakeholders and encourage them to engage with the NEITI.
4. **Openness and Learning:** the NEITI will be genuinely open to learn from stakeholders and explore new ideas unconstrained by established ways. It will learn and apply information in ways that generate new options to improve its processes and stakeholder engagement. It will actively seek feedback through formal and informal activities. It will help other stakeholders involve and listen to each other. It will, as much as possible, engage with stakeholders in their own spaces.
5. **Impact, Action and Sustained Engagement:** the NEITI will work towards engagement efforts that have real potential to make a difference, and that participants are aware of that potential. It will rigorously evaluate engagement activities for effectiveness. It will sustain efforts to achieve engagement goals and maintain the desired position with each stakeholder. It will adopt a long-term perspective to relationship building.

Stakeholder Engagement Processes

The stakeholder engagement process includes the logical sequence of activities that when consistently performed would achieve the goals of stakeholder engagement in NEITI. The proposed NEITI Stakeholder Engagement Processes involves five (5) stages which could be performed linearly or iteratively. They are as shown in Fig. 7.



Figure 9: Stages in the NEITI Stakeholder Engagement Process

Identify Stage

This entails environmental scanning to identify new or upcoming stakeholders for the NEITI and additional insight into existing stakeholders. New stakeholder groups or new actors within the group may emerge at any time. This activity may require actively requesting information from established sources. The key relationship managers will be responsible for updating the stakeholder list with the details of new stakeholders or new details of existing stakeholders. For example, the relationship manager responsible for covered companies (oil and gas) would request information about newly registered companies from the Department of Petroleum Resources. He or she could do this through the key relationship manager for covered companies (government), if that is a different person. The output of this stage is an updated stakeholder list and database.

Analyse Stage

This stage is to analyse information obtained in Stage 1 and determines the need to update either the existing stakeholder placement/map or engagement plan or strategies. Information about stakeholders are also verified at this stage. The stage utilizes analytical tools to determine the placement of the stakeholder in the power/interest grid and other stakeholder categories. Should the need arise, the stakeholder maps and / or engagement strategies and plan will be updated in this stage.

The output of this stage is updated stakeholder map, engagement strategies and plan.

Strategize Stage

This stage strategizes and plans how to engage each stakeholder. A Stakeholder Engagement Plan is developed (see template in Appendix 4) or updated based on insight from previous stages and proven or agreed strategies. The strategies and plans would also be approved by the NEITI leadership at this stage. We recommend that this stage be performed to align with the budgeting process of the NEITI so that adequate budgetary provision or support plans can be made for stakeholder engagement. The output of this stage is a Stakeholder Engagement Plan.

Engage State

In the engage stage, the NEITI staff implement the stakeholder strategies and plan. Activities in the plan may include informing stakeholders, understanding stakeholders, consulting stakeholders, educating stakeholders, collaborating with stakeholders, empowering stakeholder, or just maintaining good relations. Through all the activities in the stage, the NEITI should continue to deepen stakeholder insight which provides input into the earlier stages. The output of this stage are stakeholder engagement activities and the outcome should be positive change in stakeholder positioning.

Monitor Stage

Activities in this stage are to monitor and evaluate the implementation of the Stakeholder Engagement Process and plans. It develops, measures and tracks the key performance indices for measuring the success of NEITI's stakeholder engagement. The outputs of this stage are key performance indicators and targets, stakeholder engagement scorecard and stakeholder activity tracker.

Stakeholder Engagement Methods

This section presents an inexhaustive list of possible engagement methods suitable for different needs and contexts. It also presents useful tools for the different stages of the stakeholder engagement process.

Fig. 8 shows the levels of engagement intensity and how that corresponds to engagement levels and number of stakeholders involved.

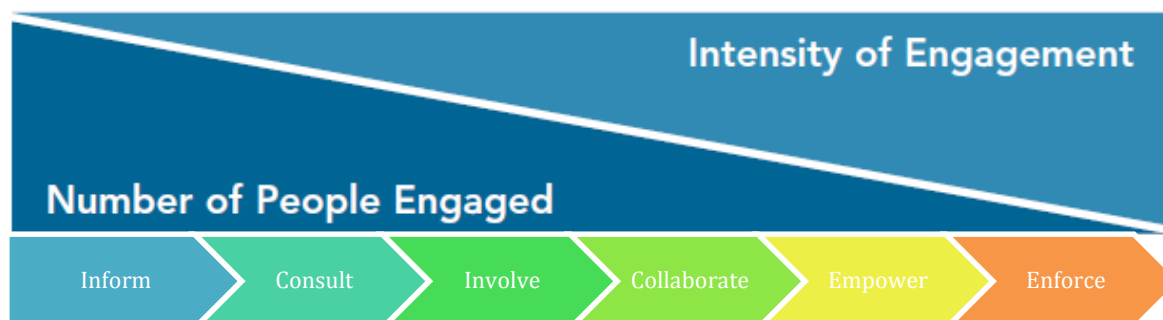


Figure 10: General Engagement Level

Table 4: Levels of Engagement and Engagement Methods

S/N	Level of Engagement	Engagement Methods	Mostly For
1.	Inform	Mass media (newspaper articles, press releases, press conferences, radio and TV shows, sponsored programs) Fact sheets e.g. infographics, Newsletter, Website, Letters	Low power/low interest stakeholders Passing low-level information to stakeholders
2.	Consult	Focus groups, Surveys, Internal and/or public meetings, Web-based meetings	Low power/high interest stakeholders and sometimes high power/low interest stakeholders
3.	Involve	Deliberative Polling, Solicitation of recommendations and proposals, Workshops, Forums, Provision of data, Web-based meetings	High power/low interest stakeholders
4.	Collaborate	Guiding or advisory bodies such as the NSWG, Work groups such as IATT an IMTT, Joint planning and shared projects, Standing or ad-hoc committees, Facilitated consensus building, and decision-making forums	High power/high interest stakeholders
5.	Empower	Training and capacity building to support joint action	High power/high interest stakeholders
6.	Enforce	Actions, as per NEITI Act, to enforce compliance	Covered entities where all other methods have failed
7.	Build Rapport	Social events, Courtesy visits, Phone calls	High power stakeholders

Internal Capacity for Stakeholder Engagement

For NEITI to successfully deploy and manage an effective stakeholder engagement framework, it needs to ensure adequate internal capacity in the following areas:

- a. Organization structure and jobs: need to review the organization structure and jobs within the Communication Department to accommodate the roles required for strategic stakeholder engagement.
- b. Competency development: a competency assessment (based on a competency model for stakeholder engagement) of staff playing key roles and development interventions developed to bridge gaps.
- c. Use of Technology: leverage technology in all aspects of stakeholder engagement especially in obtaining feedback and creating collaboration platforms.

The roles and responsibilities required are presented in Table 5.

Table 5: Roles and Responsibilities for Stakeholder Engagement in NEITI

S/N	Role	Responsibility	Proposed Role Player
1.	Advisory body on NEITI Stakeholder Engagement	▪ Approve stakeholder engagement framework and strategy ▪ Serve as Key Relationship Owners for Elected Officials, excepting NASS (i.e. the President and Vice President) and Political Appointees (i.e. members of the board of government entities) ▪ Perform roles assigned in stakeholder engagement plan (e.g., high level stakeholder engagement, lobbying, constituency management, access to high-power stakeholders, etc.)	NSWG

S/N	Role	Responsibility	Proposed Role Player
2.	Chief Engagement Manager	- Serve as Key Relationship Owner for Government Appointees (SGF, and heads of government agencies) - Perform roles assigned in stakeholder engagement plan (e.g., high level stakeholder engagement, lobbying, constituency management, access to high-power stakeholders, etc.)	The Executive Secretary
3.	Coordinating Department	- Coordinate all stakeholder engagement efforts in the NEITI - Manage and update the Stakeholder Engagement Framework - Monitor and Evaluate stakeholder engagement efforts	Communication Department
4.	Key Relationship Owners	- Lead and manage contact with stakeholder 'owned' by the department - Director, Communications is the key relationship owner of NASS. This is in view of the fact that legislative outreach is a key activity of the communications department. There is also key reasons of knowledge, familiarity and exposure to the legislative process. - Perform roles assigned in stakeholder engagement plan for stakeholders.	Departmental Directors (for stakeholders 'owned' by their departments) to serve as Relationship owners
5.	Key Relationship Advisors (for each stakeholder group, and for each key stakeholder)	In liaison with Key Relationship Owner for each stakeholder, clearly identify or define the target positioning for stakeholders in relation to their current positioning. For example, the	Within Communications Department

S/N	Role	Responsibility	Proposed Role Player
		NASS principal officers and its relevant committees should actively use the NEITI reports in performing their oversight roles to effect changes in government agencies. ▪ Create and maintain a database of relevant data on the key stakeholder: names and contact details of the members of the board, leadership and other key persons ▪ Perform ongoing environmental scanning on key stakeholder, identifying issues that could materially affect the stakeholder's position. Report on such and facilitate the development of a NEITI response to such issues ▪ Facilitate NEITI's response to invitations and representation at stakeholder events ▪ Produce formal reports and periodically brief NEITI management on stakeholder's status in relation to desired positioning ▪ Keep abreast of all activities of the NEITI in order to identify the potential involvement of stakeholder and ensure its inclusion in the respective activity	
6.	Departmental Stakeholder Representative	▪ Serve as departmental representative and contact point for all stakeholder management activities ▪ Keep abreast of all activities of the NEITI in order to identify the potential involvement of	

S/N	Role	Responsibility	Proposed Role Player
		department's stakeholders and ensure their inclusion in the respective activity ▪ Sensitize departmental members on the importance of stakeholder management and support them to play their roles in the process	
7.	All staff	▪ Serve as brand ambassadors of NEITI and promoters of transparency and accountability at every contact with any stakeholder ▪ Keep abreast of the list of the NEITI stakeholders and their departmental stakeholders ▪ Understand the engagement objectives and plan for their departmental stakeholders ▪ Understand and uphold NEITI principles of stakeholder engagement in performing their duties as every activity brings staff in contact with an internal or external stakeholder ▪ Perform roles assigned in stakeholder engagement plan for stakeholder	

8. NEXT STEPS

The following are recommended next steps for Stakeholder Engagement in the NEITI:

- a. Approval and adoption of the Stakeholder Analysis and Mapping Report by the NSWG
- b. Development of action plan to implement the proposals and recommendations in the Report
- c. Development of internal capacity to implement the Stakeholder Engagement Framework
- d. Development of Stakeholder Engagement Plans for Stakeholders and Stakeholder Group
- e. Development of a new Communication Strategy

9. CONCLUSION

This report complements the NEITI Strategic Plan 2017 – 2021. It draws on lessons from past and ongoing stakeholder engagement efforts and insights from stakeholder data and analysis to develop stakeholder maps and strategies that would help the NEITI better engage its stakeholder towards greater transparency and accountability in the extractive industries.

Beyond the strategies proffered, the Stakeholder Engagement Framework delivers to the NEITI a more structured approach to stakeholder engagement subsequently. The Framework would help the organization mainstream effective stakeholder engagement practices right across the organization, with each staff imbibing the principles and applying them across all stakeholder touchpoints.

10. APPENDIX

Appendix 1: Details of NEITI stakeholders

- 1.1 List of NEITI Stakeholder Groups
 - i. EITI
 - ii. The Presidency
 - iii. OSGF
 - iv. NASS
 - v. NSWG
 - vi. Staff
 - vii. CSOs
 - viii. Covered Entities
 - ix. Government Agencies
 - x. Companies
 - xi. Donors
 - xii. The Media
 - xiii. Professional Associations
 - xiv. Auditors
 - xv. Suppliers of goods and services
 - xvi. Anti-corruption agencies
 - xvii. MDAs
 - xviii. Citizens
 - xix. Other pressure groups, influencers, activists, CBOs, FBOs
 - xx. Investors

1.2 NEITI Stakeholder Groups and their Expected Roles

S/N	Stakeholder	Desired Action(s)
1.	EITI	Direct attention of international NGOs and pressure groups to Nigeria extractive industry
2.	The Presidency	- Appoint competent and credible members to the NSWG and Boards of government covered entities - Implement an effective performance management system to manage government covered entities - Appoint competent and credible heads of government covered entities - Hold heads of government covered entities accountable to (by every means possible) - Political support - Approve requested funding for NEITI operations
3.	OSGF	Hold heads of government covered entities accountable to (by every means possible)
4.	NASS	- Expedite action on bills to ensure transparency and accountability in the extractive industry - Ensure prompt implementation of NEITI audit recommendation through legislative oversight - Appropriate adequate funds for NEITI (approve NEIT budget)
5.	NSWG	- Fulfil mandate as per NEITI Act - Build political support for the NEITI activities
6.	Staff	- Be advocates of transparency and accountability - High level of dedication and performance - Understanding of NEITI's operations
7.	CSOs	- Participate in NEITI's engagement platforms - Advocacy on the implementation of recommendations of NEITI reports

S/N	Stakeholder	Desired Action(s)
		Use of information and data in the reports to call government and companies to account
8.	Covered Entities	
a.	Government Agencies	- Participate in validation and reconciliation meeting and providing factual documents on time - Reviewing and signing off draft reports on time - Cordial relationship in terms of providing relevant information to our appointed auditors - Comply with NEITI Act 2007 - Comply with EITI requirements
b.	Companies	- Provision of relevant information to NEITI appointed auditors. - Provision of credible and timely information - Participate in reconciliation and validation meetings with supporting documents. - Sign off on draft report.
9.	Donors	Technical and financial support to NEITI operations
10.	The Media	- Full and adequate coverage of NEITI activities - Full and adequate coverage of extractive industry operations - Amplification of the NEITI audit issues and required remedial actions - Participation in NEITI engagement activities
11.	Professional Associations	- Provide an alternative source of credible data in extractive sector - Research
12.	Auditors	- Competence and professionalism - Ensure timeliness of audits
13.	Suppliers of goods and services	- Close relationship and mutual support - Provide efficient and cost effective services to NEITI

S/N	Stakeholder	Desired Action(s)
14.	Anti-corruption agencies	- Full participation in audit process - Uptake of remediation issues relating to corruption
15.	MDAs	Policy changes in line with NEITI report recommendations
16.	Citizens	- Ask informed question on extractive industry revenues - Hold government accountable by any other means necessary - Use information from NEITI report to take informed actions
17.	Other pressure groups, influencers, activists, CBOs, FBOs	- Advocacy on the implementation of recommendations of NEITI reports - Use of information and data in the reports to call government and companies to account - Re-echoing calls for accountability and transparency
18.	Investors	Invest in companies that are transparent and accountable and divest from those that are not

1.3 Database of NEITI Stakeholders



NEITI Stakeholder
Database.xlsx

Appendix 2: Feedback from Data Gathering Activities

2.1 Internal and External Validation Interviews



[Validation Interviews] NEITI Sta

2.2 Notes from Focus Group Discussions



Miutes of Meeting -
NEITI Focus Group Di:



Meeting Summary -
NEITI Report Validatic

2.3 Citizens' Survey Results



NEITI_ Citizens'
Survey200617.pdf

Accessible at: <https://docs.google.com/forms/d/1-iySLxB30AonwxXerSNrEMvJvJkD0k8UiTuHyVqK9c/viewanalytics>

2.4 Staff Survey Results

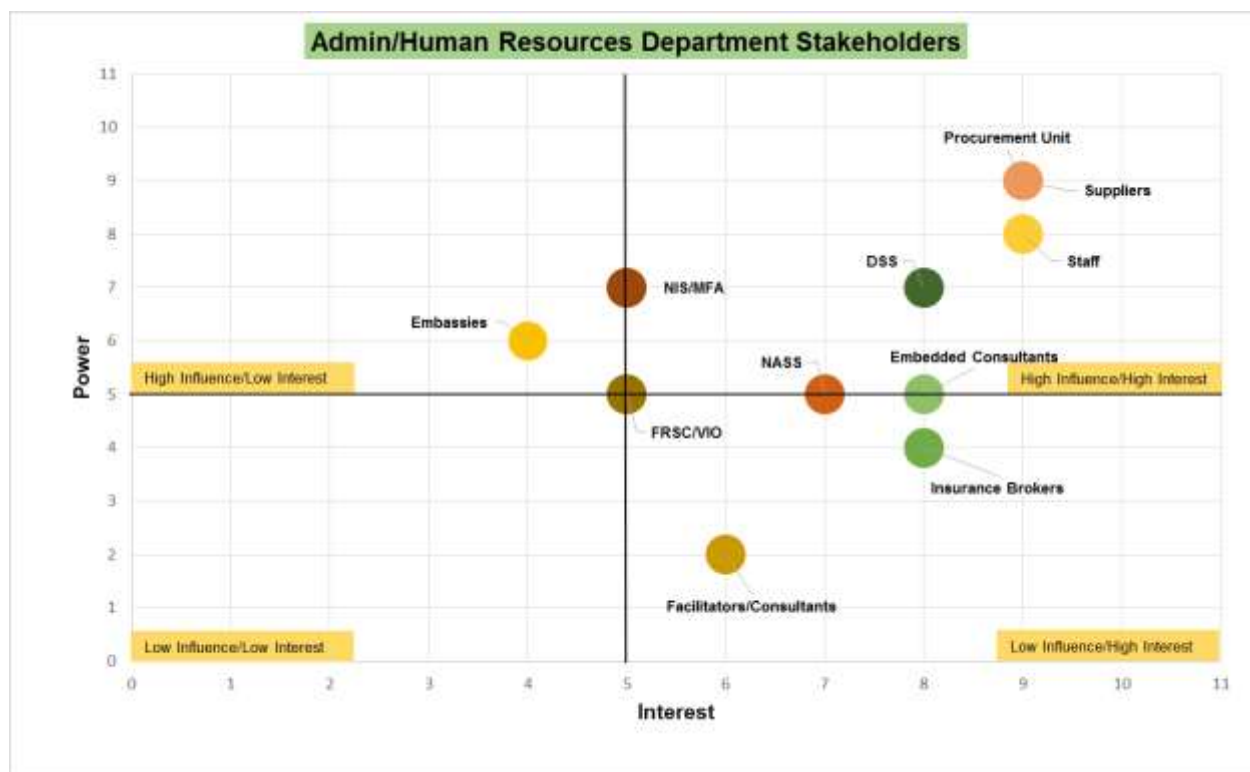


NEITI Stakeholder
Mapping_ Staff Survey

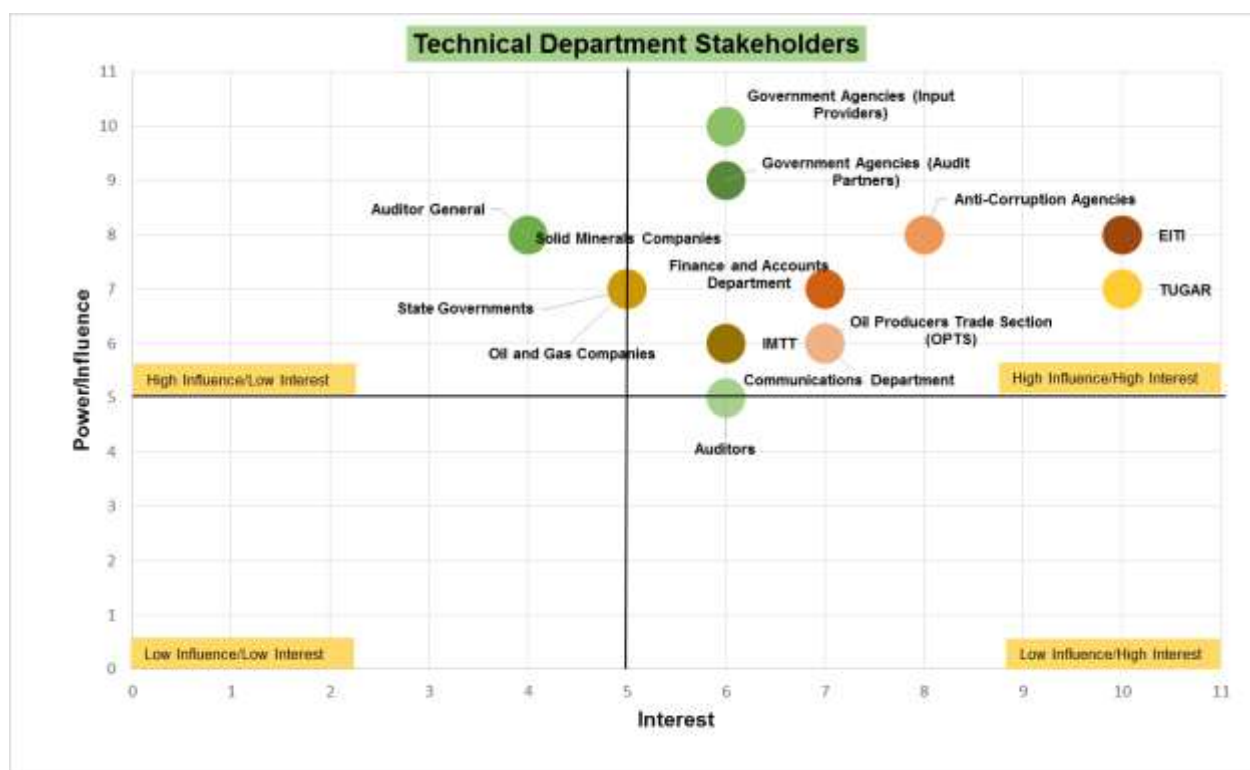
Accessible at
https://docs.google.com/forms/d/1ikuNClytG67LqCep8Pe623yCWkDMqF7recoz_8Y_DqA/viewanalytics

Appendix 3: NEITI Departmental Stakeholder Maps by Power and Interest

3.1 Admin/Human Resources



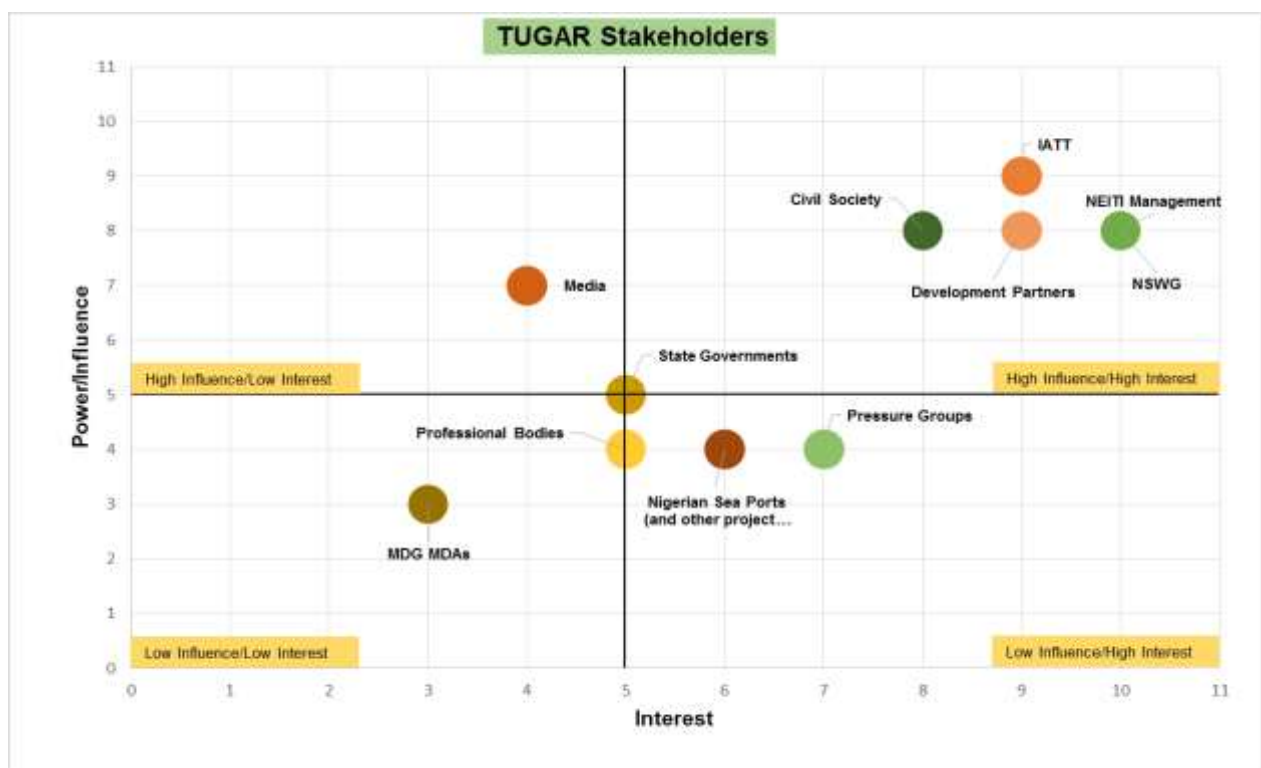
3.2 Technical Department



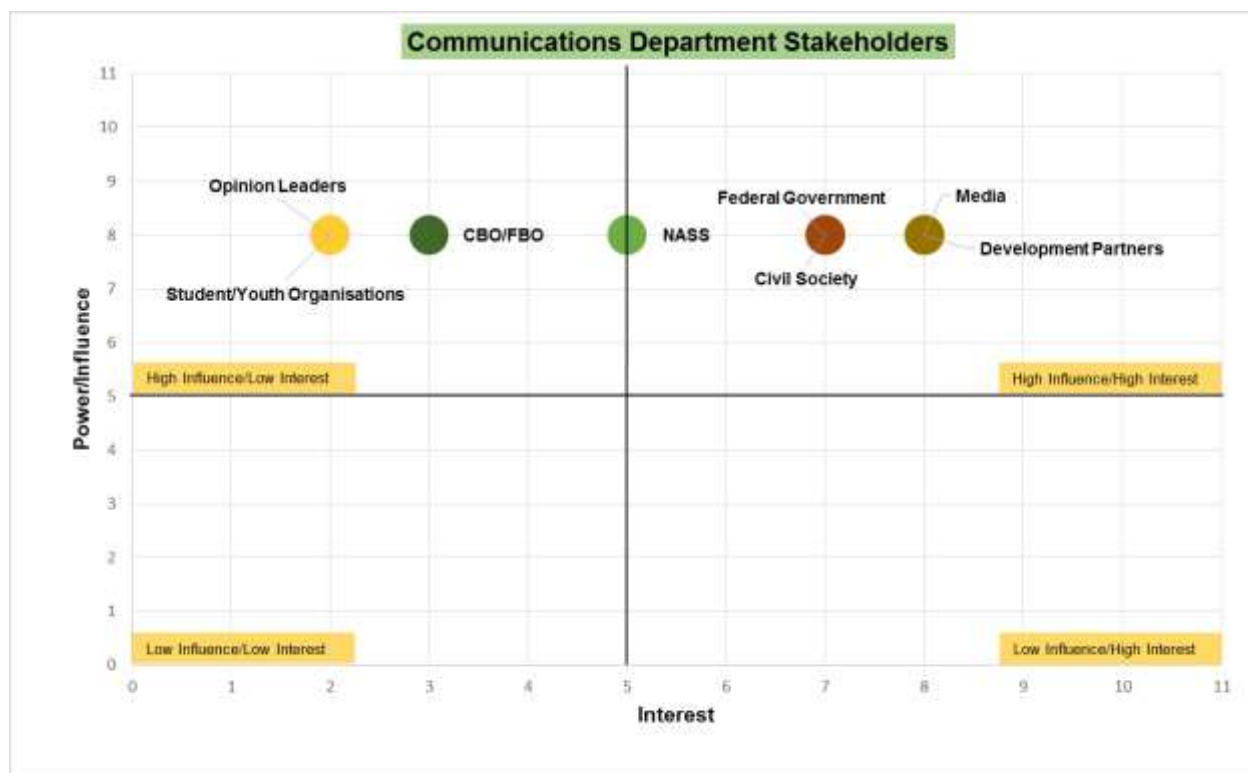
3.3 Finance and Accounts Department



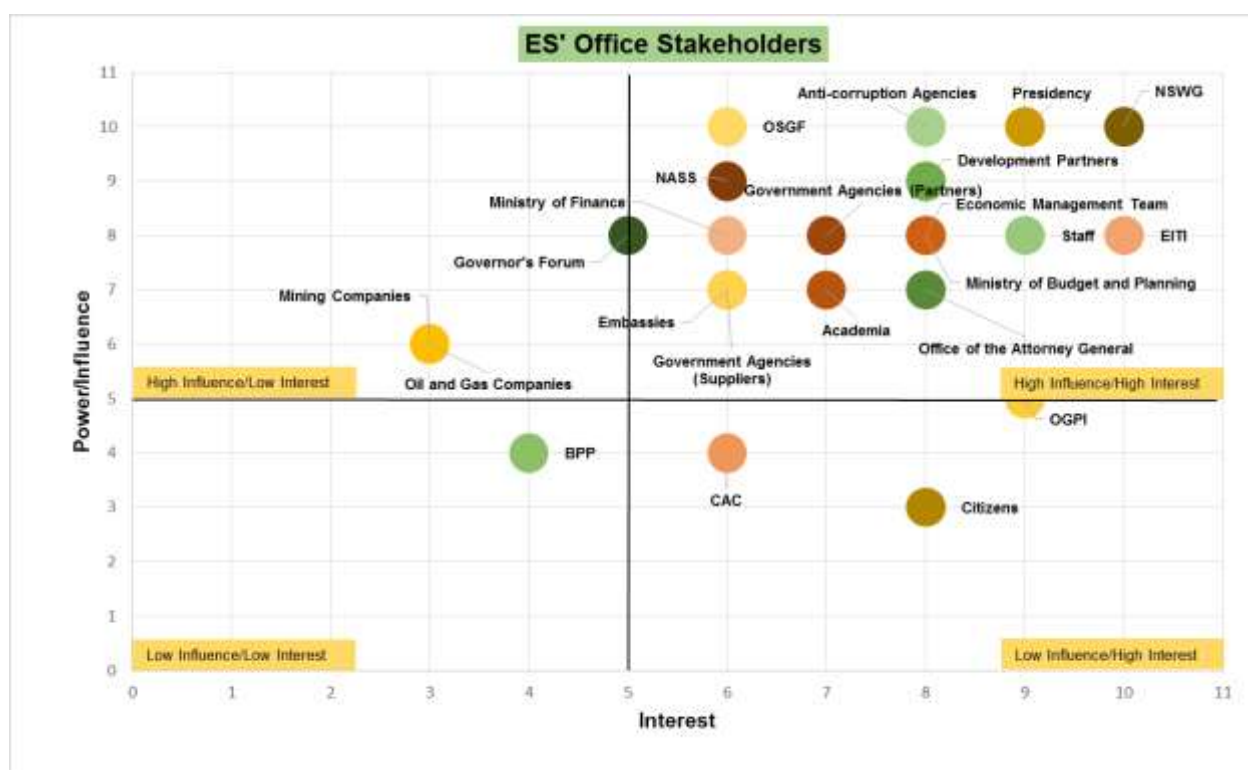
3.4 TUGAR



3.5 Communications Department



3.6 ES' Office



Appendix 4: Templates for Stakeholder Management

4.1 Stakeholder Engagement Plan Template



NEITI Stakeholder
Engagement Plan.xlsx

4.2 Stakeholder Insight Form



NEITI External
Stakeholder Insight Q

4.3 Stakeholder Analysis and Mapping Template (MsExcel)



Stakeholder Mapping
ScoresV3.xlsx

4.4 Stakeholder Analysis and Mapping Template (MsPowerpoint)



Stakeholder Mapping
Diagrams.pptx

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