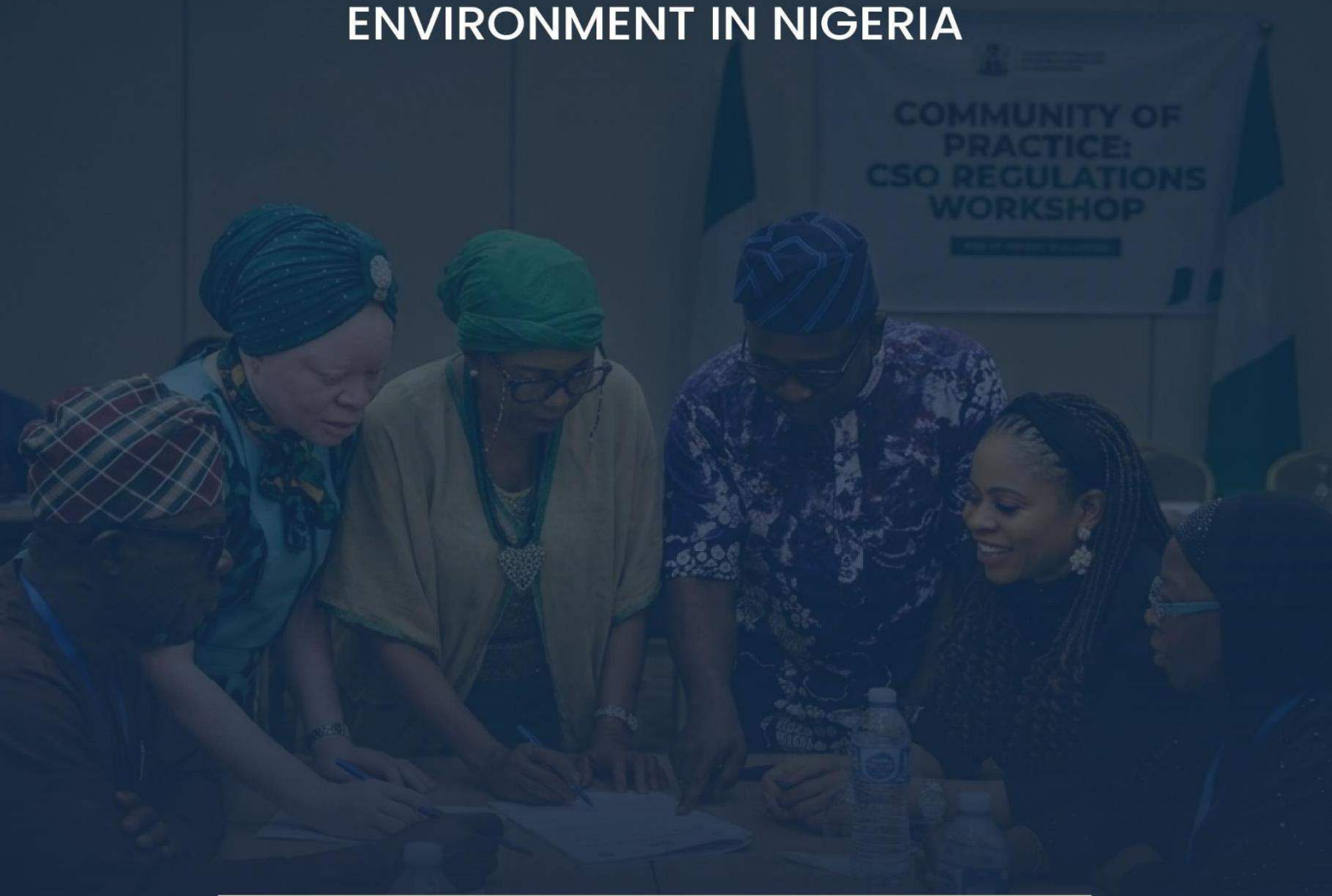




STRENGTHENING A COMMUNITY OF PRACTICE

TO IMPROVE CSO REGULATORY
ENVIRONMENT IN NIGERIA



END OF PROJECT EVALUATION REPORT

MAY
2026



STRENGTHENING A COMMUNITY OF PRACTICE TO IMPROVE CSO REGULATORY ENVIRONMENT IN NIGERIA

END OF PROJECT EVALUATION

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Nextier takes full responsibility for the content of this report. Any errors or misrepresentations in the document are our own.

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Abbreviations and Acronyms

CAC	Corporate Affairs Commission
CAPI	Computer-Assisted Personal Interviewing
CoP	Community of Practice
CSO	Civil Society Organisation
DAC	Development Assistance Committee
EU	European Union
FGD	Focus Group Discussion
FIRS	Federal Inland Revenue Service
IDI	In-depth Interview
KII	Key Informant Interview
M&E	Monitoring and Evaluation
MDA	Ministry, Department, and Agency
NGO	Non-Governmental Organisation
NHIA	National Health Insurance Authority
NSITF	Nigeria Social Insurance Trust Fund
OECD	Organisation for Economic Cooperation and Development
OCAT	Organisational Capacity Assessment Tool
PENCOM	National Pension Commission
SCUML	Special Control Unit against Money Laundering
SIRS	State Internal Revenue Service
SMoJ	State Ministry of Justice
ToC	Theory of Change
ToR	Terms of Reference

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Foreword

For years, civil society organisations in Nigeria have operated within an increasingly complex and, at times, restrictive regulatory environment. While civil society remains central to democratic participation, accountability, and social development, the sector continues to navigate overlapping compliance requirements, inconsistent regulatory frameworks, and recurring policy proposals that threaten to narrow civic space and constrain independent action. These challenges are often even more pronounced at the subnational level, where inconsistent administrative procedures and varying interpretations of regulatory obligations create uncertainty for organisations working closest to communities.

Efforts to address these challenges have historically been hindered by limited coordination between civil society actors, weak engagement between CSOs and state institutions, and inadequate understanding of the legal and regulatory frameworks governing the sector. In many instances, civil society organisations, particularly smaller and emerging grassroots organisations, struggle with compliance obligations and with accessing the knowledge, resources, and institutional support necessary to operate effectively and sustainably. At the same time, opportunities for structured dialogue between civil society, regulators, and policymakers have often remained limited, leaving critical policy conversations reactive rather than collaborative.

With support from the European Union, Global Rights sought to address these challenges through the implementation of the project Strengthening a Community of Practice to Improve CSO Regulatory Environment in Nigeria, implemented between February 2023 and July 2026 across seven states — Oyo, Ogun, Osun, Anambra, Ebonyi, Cross River, and Akwa Ibom — alongside national-level advocacy efforts aimed at strengthening Nigeria's civic space and improving the operational environment for civil society organisations.

This endline evaluation reflects on the progress made through that intervention and the lessons emerging from three years of implementation. The findings point to meaningful improvements in how civil society organisations understand and navigate regulatory compliance requirements. Across the project states, participating organisations have strengthened their knowledge of statutory obligations, improved compliance practices, and reported greater confidence in engaging regulators and other state institutions. Communities of Practice established under the project have also created stronger networks for peer learning, collective action, and sustained dialogue around civic space issues at the subnational level.

The project has also contributed to strengthening relationships between civil society actors and institutional stakeholders. Engagements with legislators, regulators, and policy actors have created opportunities for more constructive dialogue around regulatory reform, while efforts to advance harmonisation of subnational regulatory frameworks have helped bring greater visibility to longstanding structural challenges affecting civil society operations. The development of evidence-based tools, including the state-level mapping processes and ranking dashboard, has further contributed to improving access to knowledge and strengthening advocacy efforts within the sector.

The evaluation also makes clear that while significant progress has been achieved, sustaining these gains will require continued investment.

What emerges clearly from this evaluation is that when civil society organisations are provided with the knowledge to navigate regulatory systems, supported through collective platforms for collaboration, and connected to institutions through structured engagement, they are better positioned to operate sustainably, advocate effectively, and contribute meaningfully to democratic governance and inclusive development.

We extend our sincere appreciation to the European Union for supporting this intervention, the independent evaluation team at Nextier for undertaking this assessment, our partners and stakeholders across the seven project states, and the many civil society organisations whose participation, commitment, and collaboration made the achievements documented in this report possible.

As this project concludes, our focus now turns to sustaining the systems, partnerships, and momentum built over the last three years, while continuing to strengthen Nigeria's civic space and ensuring that civil society organisations can operate within a regulatory environment that enables, rather than constrains, their important work.

Abiodun Baiyewu

Executive Director

Project Background. This report presents the findings of an independent end-of-project evaluation of the EU-funded project titled “Strengthening a Community of Practice to Improve CSO Regulatory Environment in Nigeria,” implemented by Global Rights with support from the European Union. The three-year Project (February 2023 – July 2026) was implemented across seven states—Oyo, Ogun, Osun, Anambra, Ebonyi, Cross River, and Akwa Ibom — as well as at the national level. It sought to strengthen Nigeria’s civic space by improving CSO regulatory compliance, enhancing engagement between CSOs and state institutions, facilitating multi-stakeholder dialogue, and promoting evidence-based advocacy. Core strategies included the establishment of Communities of Practice (CoPs) in all seven states, structured capacity-building on regulatory compliance, facilitated engagement with legislators and regulators and national-level constitutional advocacy on Item 32 of the 1999 Constitution.

Evaluation purpose and use. The purpose of this independent end-of-project evaluation is to assess the project’s performance and progress towards achieving its stated goals and objectives, and to determine the effectiveness of project strategies and interventions. The evaluation is part of the project’s close-out activities. It is intended to be an independent assessment of progress made against the strategic objectives that the project set out to achieve and to generate insights for programme learning, accountability, and future programming.

Approach/Methodology. The evaluation was conducted by Nextier, an independent monitoring, evaluation, and learning firm based in Abuja. It adopted a mixed-methods design combining quantitative and qualitative approaches. A structured survey questionnaire was administered to 39 CSO representatives across all 7 target states, capturing endline data on key indicators for the 6 OECD-DAC evaluation criteria (relevance, effectiveness, efficiency, impact, sustainability, and coherence). Complementary qualitative data were collected through 10 key informant interviews (KIs), 14 focus group discussions (FGDs), and a systematic desk review. An outcome harvesting approach was applied as a supplementary lens to document complex and non-linear changes in the civic space environment.

Key Findings and Conclusions

The evaluation documented findings against six categories of OECD-DAC criteria. The key findings are as follows:

- **Relevance:** An overwhelming majority, 92.3% of respondents, reported that the project addressed their regulatory and operational challenges to a great or moderate extent. All 39 respondents found project activities relevant to their operational needs, with 76.9% rating them as highly relevant. Regulatory compliance complexity, limited engagement with regulators, and low awareness of CSO obligations were the most cited pre-project challenges, confirming the project’s alignment with critical needs in the operating environment.
- **Effectiveness:** 92.3% of CSOs participated in regulatory compliance training. Post-project, 87.2% rated their understanding of regulatory requirements as good or very good, and 92.3% reported improvement in their capacity to navigate the regulatory environment. CAC filing

was the most commonly improved compliance area (61.5%), followed by FIRS/SIRS obligations (20.5%) and SCUML registration (7.7%). Community of Practice participation reached 69.2% of surveyed CSOs.

- **Efficiency:** 84.6% of respondents rated project delivery, in terms of timing, communication, and logistics, as good or very good. All respondents found project platforms at least somewhat accessible, and 92.3% confirmed that the benefits gained fully justified their time investment. Key efficiency gaps include short training durations, absence of locally-based project staff in target states, and limited operational funding for State Steering Committees.
- **Impact:** 76.9% of respondents reported improved confidence in engaging regulators; 69.2% reported increased collaboration with other CSOs; 64.1% reported improved organisational credibility; and 56.4% reported reduced fear of regulatory sanctions. A significant 87.2% assessed the project's contribution to improving the civic space environment as moderate or great, and 66.7% observed policy, administrative, or behavioural changes by regulators or lawmakers linked to the project.
- **Sustainability:** 94.9% of respondents indicated they are likely or very likely to continue applying the regulatory knowledge gained. Notably, no respondent believed the Community of Practice would not continue beyond the Project; 69.2% said it definitely would. Availability of funding (76.9%), strengthening of CoPs (53.8%), and continued engagement with regulators (46.2%) were the most cited sustainability factors.
- **Coherence:** 84.6% of respondents confirmed the project complemented other CSO support initiatives strongly or moderately, and 84.6% affirmed full alignment with existing national or state-level civic space reforms. No respondents found the project to be incoherent with the broader policy environment.

Overall Rating. 92.3% of respondents rated the project as good or excellent overall, with no respondent rating it as poor or very poor. This is a near-exceptional endorsement that spans all six DAC criteria and is consistent across all seven states.

Recommendations

The following key recommendations have been drawn from the findings of the evaluation:

1. Establish dedicated state-level CoP secretariats with modest yet consistent operational budgets to sustain peer learning, compliance advocacy, and collective action beyond the project lifecycle.
2. Develop a CSO Compliance Support Fund or matching grant scheme to offset regulatory compliance costs, directly addressing the structural funding barrier cited by 76.9% of respondents as the top sustainability risk.
3. Embed at least one state-level project liaison in each target state in future phases to ensure continuity of mentorship, follow-up, and responsiveness to CSO needs.
4. Redesign training as multi-session, modular, competency-based programmes with pre- and post-training support, replacing two-day formats that were widely described as insufficient.

5. Deepen legislative and regulatory engagement through sustained, politically informed advocacy strategies that go beyond training sessions to address systemic reforms.
6. Expand geographic and organisational coverage in future phases to include rural, community-based organisations that were underserved in the current cycle.

1. Evaluation Mandate and Framework

1. Overview

1.1. Introduction

Global Rights, with support from the European Union, implemented the project titled “Strengthening Nigeria’s Civic Space by Building Multi-stakeholder Platforms to Improve the Operational and Regulatory Environment for Civil Society Organisations,” from February 2023 to July 2026. The project was implemented across seven states — Oyo, Ogun, Osun, Anambra, Ebonyi, Cross River, and Akwa Ibom—and at the national level.

The intervention was designed to address structural, regulatory, and institutional constraints that limit CSOs’ effectiveness and sustainability at the subnational level. Civil society organisations in Nigeria operate within a fragmented and frequently restrictive regulatory environment, where subnational legal and administrative frameworks governing CSO registration, compliance, and operations vary significantly across states, creating barriers to organisational sustainability, donor eligibility, and effective public engagement. The project sought to address both the demand side (CSO capacity and compliance) and the supply side (regulatory frameworks and institutional engagement) of the civic space ecosystem.

As the project concludes, Global Rights commissioned Nextier, an independent monitoring, evaluation, and learning firm based in Abuja, to undertake this end-of-project evaluation as an exercise of accountability towards the donor and project beneficiaries. The evaluation is intended to be an independent, external assessment of the overall progress and effectiveness of the project and a measure of progress against the strategic objectives it was set out to achieve. The outcomes of this evaluation are intended to provide insights for programme learning, accountability, and future programming design.

1.2. Structure of the report

This report is structured as follows:

1. Part I summarises the evaluation mandate, including the project background, objectives, evaluation framework, and methodology.
2. Part II presents thematic analysis of evaluation data, organised according to the six OECD-DAC criteria: relevance, effectiveness, efficiency, impact, sustainability, and coherence.
3. Part III presents implementation challenges, lessons learned, and best practices.
4. Part IV contains the overall conclusions of the evaluation.
5. Part V presents recommendations based on the evaluation findings.
6. The annexes provide supporting documentation, including the sample framework, data collection tools, and verbatim quotes.

1.3. The Project Overview and Objectives

The project was designed to stem the erosion of civic space at the subnational level in Nigeria, particularly the barriers created by complex, inconsistent, and poorly understood regulatory

frameworks governing CSO registration, compliance, and operations. The project worked to improve the enabling environment for civil society through five mutually reinforcing outcomes:

1. Outcome 1: Increased capacity of CSOs on regulatory compliance — CSOs in the seven target states improve their understanding of existing regulatory compliance frameworks, enabling them to navigate the regulatory environment more effectively and reduce exposure to avoidable administrative sanctions or government clampdowns.
2. Outcome 2: Improved relationships between CSOs and state institutions — Enhanced relationships, based on mutual understanding and collaboration, are established between CSOs, state legislatures, and regulatory institutions through structured engagement platforms, conferences, and sustained dialogue.
3. Outcome 3: Harmonisation of subnational CSO regulatory frameworks — Progress is made toward harmonising CSO registration and regulatory procedures at the subnational level through administrative reforms, policies, or legislative instruments informed by collective CSO advocacy.
4. Outcome 4: Strengthened national-level advocacy on constitutional reform — Advocacy efforts contribute to the national dialogue on amending Item 32 of Part I of the Second Schedule of the 1999 Constitution, thereby improving coherence in the regulatory environment.
5. Outcome 5: Improved access to knowledge on civic space conditions — CSOs and policymakers gain access to credible, comparative data through a state mapping protocol and operational dashboard (CRP IWP).

1.4. Theory of Change

The project's Theory of Change (ToC), grounded in political economy analysis and sustained engagement with civil society and state institutions, posits: IF CSOs at the subnational level strengthen their understanding of regulatory compliance requirements and enhance their organisational practices, AND IF structured platforms are established to facilitate regular engagement and alliance-building between CSOs, legislators, and regulators, AND IF evidence-based advocacy, policy dialogue, and strategic communications promote harmonised regulatory approaches and accountability, THEN the regulatory and operational environment for civil society will become more coherent, predictable, and enabling at the subnational level, BECAUSE improved CSO capacity, institutional trust, and policy coherence are mutually reinforcing and essential for sustaining civic space and inclusive governance in Nigeria.

1.5. Implementing Partners and Project Stakeholders

The Project directly engaged CSOs, legislators, regulatory bodies, and other civic actors across the seven target states. Key stakeholders include state-level CSO leaders, State Ministries of Justice, CAC liaison offices, CSO desk officers, members of state Houses of Assembly, Community of Practice coordinators, multi-stakeholder platform members, and the Global Rights project team .

2. Evaluation Framework

2.1. Purpose and Objectives of the Final Evaluation

The purpose of this independent end-of-project evaluation is to assess the Project's achievements against its set objectives, identify and document lessons learned, and assess how the programme contributed to strengthening the civic space environment in Nigeria at the subnational level.

The overall objectives of the evaluation are:

- To assess the Project's performance and progress towards achieving its stated goals and objectives;
- To determine the effectiveness of the Project's strategies and interventions;
- To assess the extent of the Project's relevance, efficiency, effectiveness, intended and unintended impacts, and indicative sustainability;
- To document lessons learned and provide recommendations on how to improve programming for similar interventions in the future.

2.2. Scope of the Endline Study and Evaluation

The evaluation's geographic scope covers all seven project states, Oyo, Ogun, Osun, Anambra, Ebonyi, Cross River, and Akwa Ibom, as well as national-level activities. The thematic scope covers CSO regulatory compliance and operational capacity, multi-stakeholder engagement and dialogue, legislative and administrative advocacy outcomes, Community of Practice functionality and sustainability, and the CRP Interactive Web Platform. The time scope covers the full project lifecycle from February 2023 to July 2026.

2.3. Evaluation Criteria Used and Key Questions

This evaluation was guided by the Organisation for Economic Co-operation and Development (OECD) Development Assistance Committee (DAC) evaluation criteria of relevance, effectiveness, efficiency, impact, sustainability, and coherence. The key evaluation questions are shown in Table 1 below.

Table 1: Evaluation Criteria and Key Questions

Evaluation Criteria	Key Questions
1. Relevance	1.1 How relevant were the project objectives and interventions to the priority needs of CSOs and civic actors within the Nigerian regulatory context? 1.2 Were the programmatic choices and target beneficiaries appropriate to ensure effectiveness?
2. Effectiveness	2.1 To what extent did the Project achieve its intended outputs and outcomes? 2.2 How effective were regulatory compliance trainings, CoP meetings, and engagement platforms in improving CSO capacity and institutional relationships?
3. Efficiency	3.1 How efficiently were project inputs converted into results? How well were financial, human, and technical resources deployed in terms of timeliness, cost-effectiveness, and coordination?

4. Impact	4.1 What observable changes in CSO behaviour, institutional relationships, and the broader civic space environment are attributable to the Project? 4.2 Are there early signs of systemic change?
5. Sustainability	5.1 How likely is it that project benefits, platforms, partnerships, and capacities will continue beyond the project lifecycle? 5.2 What factors support or threaten sustainability?
6. Coherence	6.1 To what extent did the Project complement other donor-funded initiatives, national policies, and Global Rights' broader civic space programming?

The detailed questions are indicated within the data collection instruments that are annexed to this report.

2.4. Evaluation Timeframe

The evaluation was conducted in the May of 2026. It consisted of desk review, primary data collection (survey, KIIs, and FGDs), data analysis, and report writing. Field data collection took place concurrently across the seven project states.

3. Evaluation Approach and Methodology

3.1. Evaluation Design

The evaluation team assessed the extent to which the Project met its objectives using the OECD-DAC criteria. The evaluation methodology adopted a mixed-methods research approach, integrating quantitative and qualitative methods to produce a results-oriented, evidence-based report that documents achievement of expected outputs and outcomes. The evaluation also adopted systems thinking and contribution analysis to assess the Project's influence in complex regulatory and governance environments, where attributing outcomes to a single intervention would be methodologically inappropriate.

To assess impact, the evaluation team drew on primary data from the survey, KIIs, FGDs, and project monitoring documents, as well as an Outcome Harvesting approach to document concrete changes in behaviours, relationships, and institutional practices that can be plausibly linked to the Project's contributions. Emphasis was placed on analysing both intended and unintended, positive and negative, changes.

3.2. Data Collection Methods and Sources

Primary quantitative data were collected through a structured survey administered to a purposively selected, stratified sample of 39 CSOs (one representative per organisation) across the seven target states (five to seven per state). The survey was designed to capture endline data on key indicators aligned with the Project's logical framework and OECD-DAC criteria. It was digitised in KoboCollect and administered via face-to-face interviews.

Sample Size and Justification: The sample of 39 CSOs was determined through a stratified purposive sampling approach, with five to seven organisations selected per state to ensure proportional geographic representation across all seven target states. Rather than pursuing a statistical sample from the full population of participating organisations, the evaluation team designed the survey to capture in-depth, organisation-level data on key OECD-DAC indicators. The sample size is consistent with established norms for evaluation surveys in similar civil society capacity-strengthening programmes, where depth of evidence on organisational change is prioritised over population coverage.

A. DESK REVIEW OF PROJECT DOCUMENTS AND OTHER RELEVANT DOCUMENTATION WAS UNDERTAKEN, which helped deepen our understanding of the Project, its dynamics, and what had been achieved. Documents reviewed included project-related documents with particular focus on the intervention logic and the results matrix, including indicators and benchmarks (baselines, targets, and sources of verification); M&E-related documents on the Project (such as project-level quarterly monitoring reports and any other relevant material produced by the Project).

B. KEY INFORMANT INTERVIEWS:

Qualitative Data Collection: Primary qualitative data were collected through Key Informant Interviews (KIIs) and Focus Group Discussions (FGDs) conducted across the seven target states. A total of 10 KIIs were conducted with selected stakeholders to gather in-depth insights on project implementation, outcomes, challenges, and sustainability. In addition, 14 FGDs were conducted, with 2 per state, to capture participants' experiences, perceptions, and perspectives on the Project's relevance, effectiveness, impact, coherence, and sustainability. The discussions were guided by semi-structured interviews and discussion guides, and conducted face-to-face by trained field researchers.

Structured Survey: Primary quantitative data were collected through a structured survey administered to a purposively selected, stratified sample of 39 CSO representatives across the seven target states (five to seven per state). The survey was designed to capture endline data on key indicators aligned with the Project's logical framework and OECD-DAC criteria. It was digitised in KoboCollect and administered via face-to-face interviews.

Table 2: Survey Sample by State

State	Respondents	Male	Female
Oyo	5	3	2
Ogun	6	3	3
Osun	6	3	3
Anambra	5	3	2
Ebonyi	5	3	2
Cross River	7	4	3
Akwa Ibom	5	2	3
TOTAL	39	21 (53.8%)	18 (46.2%)

3.3. Data Collection Instruments

For the quantitative component, a structured standardised questionnaire was developed covering seven thematic sections (A through H): organisational profile and respondent demographics; relevance; effectiveness; efficiency; impact; sustainability; and coherence. The questionnaire also included open-ended questions on the most significant benefits, key challenges, and recommendations for future programming.

For the qualitative component, semi-structured interview guides and FGD protocols were developed for each of the six stakeholder categories. All qualitative guides are structured around the OECD-DAC criteria and include probing questions to elicit detailed narratives on CSO capacity development, regulatory engagement, CoP functionality, and sustainability.

3.4. Training of Enumerators and Quality Control

Enumerators and research assistants underwent structured training covering evaluation objectives and methodology, a detailed review of data collection tools, ethical considerations and informed consent procedures, the use of KoboCollect for digital data entry, and practical field simulations. This ensured consistency, accuracy, and adherence to evaluation standards across all seven states.

3.5. Data Analysis

The following analytic tools were used for the analysis of evaluation data and findings:

i. Content and qualitative analysis

The evaluation team conducted the following activities:

- Collected qualitative data from the review of the documentation related to the Project (i.e. documents on M&E, evaluation reports) as well as from the interviews and FGD responses.
- All interviews were transcribed in full (and translated, where required), yielding extremely rich information. Stored all the data and information (i.e. interview transcripts, extracts from project documents) in a shared folder by collection type (i.e. focus groups, interviews);
- Reviewed, coded, and sorted the information – the evaluation team reviewed the information, began identifying ‘patterns’ in the data (i.e., similarities, differences in responses, and/or relationships between themes), and organised them into specific categories and themes. Those categories were developed mainly around the evaluation criteria and evaluation questions, yet the evaluation team created new ones when needed. The process of reviewing and analysing the information also involved interpreting the information. The team used NVivo to help code the data.
- Validated the individual piece of information by triangulating the information by looking for further information/data from other sources. At times, the evaluation team returned to the same source (i.e., KII) to validate or disconfirm the emerging finding.

ii. Quantitative analysis

Quantitative data have been analysed using SPSS, and the graphs have been presented using Microsoft Excel graphics.

iii. Triangulation

The evaluation also used triangulation to strengthen the reliability and credibility of the assessment. In particular, triangulation consisted of:

- a. Using different methods – in this case, the evaluation team compared methods and sought the same information through different data collection tools (i.e. KIIs, FGDs, Survey questionnaire);
- b. Using different sources, the evaluation team sought the same information (i.e., different respondents from KIIs and different stakeholder categories). In general, quantitative and qualitative analyses were combined to triangulate information and sources, and to discover emergent themes and key patterns.

3.6. Ethical considerations

At the core of the ethical principles deployed during the evaluation was the need to always do good and do no harm. Thus, the ethical considerations incorporated into ensuring the successful execution of the assessment included obtaining written and oral consent from literate and illiterate respondents before conducting interviews with all respondents, and after apprising them of the purpose of the evaluation in English or the local language. Further, participation in the assessment was voluntary and based on informed consent, which entailed providing interview respondents or survey participants with information about the evaluation and its approach, their role in the study, the roles of the evaluation team, and the attendant personal benefits, both direct and indirect. To address confidentiality issues, respondents' names and addresses were not recorded on the questionnaires or interview protocols.

3.7. Limitations

Several limitations were noted. The availability of key stakeholders, particularly senior legislators and regulatory officials, was constrained by institutional schedules, necessitating virtual interviews in some cases. Social desirability bias cannot be entirely excluded from survey responses, even though the evaluation team's independence was clearly communicated to all respondents. The limited baseline data against which to benchmark some outcome indicators constrained the assessment of change over time for select indicators. Tight evaluation timelines also limited the extent of data triangulation with hard-to-reach stakeholders. These limitations notwithstanding, sufficient evidence has been gathered to draw findings that effectively answer the evaluation questions.

2. Evaluation Findings and Discussion

The evaluation documented findings against six categories of the OECD-DAC criteria: relevance, effectiveness, efficiency, impact, sustainability, and coherence. For triangulation, findings from the quantitative survey have been validated against qualitative data from FGDs and KIs, as well as project monitoring records. The first section below outlines the general characteristics of surveyed organisations.

4. Descriptive Statistics: Demographic Profiles of Surveyed Organisations

A total of 39 organisations were surveyed across the seven project states. Table 3 below shows the distribution of surveyed organisations by state and key organisational characteristics.

Table 3: Demographic snapshot of surveyed Organisations

Characteristic	Category	Count	Percentage
State	Oyo	5	12.8%
	Ogun	6	15.4%
	Osun	6	15.4%
	Anambra	5	12.8%
	Ebonyi	5	12.8%
	Cross River	7	17.9%
	Akwa Ibom	5	12.8%
Sex	Male	21	53.8%
	Female	18	46.2%
Legal Status	CAC-Registered (Incorporated Trustee)	35	89.7%
	Company Limited by Guarantee	1	2.6%
	Registered at State/LGA Level Only	1	2.6%
	Not Formally Registered	1	2.6%
Staff Size	1–5	25	64.1%
	6–10	8	20.5%
	11–20	5	12.8%
	Over 20	1	2.6%

The profile of surveyed CSOs reflects the broader landscape of civil society in Nigeria, characterised by small, formally registered organisations with significant compliance burdens relative to their institutional capacity. 89.7% of respondents held CAC registration as incorporated trustees, and 64.1% operated with fewer than five full-time staff. The near-equal gender split of respondents (54% male, 46% female) reflects deliberate efforts in the project design to ensure gender-inclusive beneficiary engagement.

5. Performance of Project Phase II Under OECD-DAC Evaluation Criteria

5.1. Relevance and Appropriateness of Project Activities

This section assesses the extent to which the project's objectives and activities addressed the priority needs of CSOs and civic actors within Nigeria's regulatory and political context, at the national and subnational levels.

The evaluation process has shown that the implemented interventions have been both relevant and appropriate to the needs of beneficiary CSOs in all seven target states. This observation is based on responses from CSO representatives in the survey and is corroborated through FGDs and KIIs with implementing partners, regulatory bodies, legislators, and community stakeholders.

5.1.1. Pre-Project Challenges

Respondents were asked to identify the regulatory and operational challenges most relevant to their organisations before the project commenced. Table 4 below shows the distribution of responses.

Table 4: Pre-Project Challenges Reported by CSOs (Multiple Response)

Pre-Project Challenge	% of Respondents
Regulatory compliance complexity	56.4%
Limited engagement with regulators	53.8%
Low awareness of CSO obligations	46.2%
Exclusion from donor opportunities	30.8%
Risk of government clampdown	28.2%
Limited engagement with legislators	17.9%

Regulatory compliance complexity and limited engagement with regulators were the two most-cited pre-project challenges, reported by more than half of the surveyed CSOs

FGDS and KII respondents across the seven project states reported significant challenges related to compliance with regulatory requirements, including taxation, reporting obligations, registration processes, and engagement with regulatory institutions. Many participants indicated that limited knowledge of compliance requirements affected the effectiveness and credibility of CSOs. This challenge was particularly pronounced in Cross River, where respondents noted that many organizations lacked adequate structures and understanding of compliance obligations. As one participant explained, *"Before this project, many organizations did not fully understand the compliance requirements and were operating without proper structures in place"* (FGD-CR-CSO-01, May 2026).

Participants also highlighted weak coordination and collaboration among CSOs, with many organizations operating in isolation and having limited opportunities for collective advocacy and engagement with policymakers. This issue was particularly evident in Anambra, where respondents

emphasized the absence of structured engagement between civil society and government actors. As one respondent noted, *“There was little engagement between civil society and government actors, and many organizations were working in isolation”* (KII-AN-CSO-03, May 2026). Similar concerns were reported in Oyo and Ebonyi, where weak coordination among CSOs limited collective action and policy influence.

The findings further revealed mistrust and weak communication between CSOs and government institutions, alongside inadequate organizational management capacity, poor documentation systems, limited advocacy skills, and financial sustainability concerns. In Osun State, respondents particularly emphasized low awareness of registration and compliance requirements among smaller organizations. One participant observed that *“so many people are doing a whole lot and are not really registered”* (KII-OS-CSO-01, May 2026). Respondents also highlighted the disconnect between regulators and CSOs, noting that *“there is that distance between the regulators and the CSOs, and there is a need to bridge that gap”* (KII-OS-CSO-01, May 2026).

While the challenges were broadly similar across all states, differences emerged in their emphasis. Cross River respondents focused more on regulatory compliance and organizational structures; Anambra respondents highlighted weak engagement between CSOs and government institutions; Osun respondents emphasized registration, compliance awareness, and regulator-CSO relations; while Oyo and Ebonyi participants more frequently discussed coordination challenges and limited opportunities for collective advocacy. Across all states, these challenges were linked to reduced organizational effectiveness, weaker policy influence, and constrained civic space participation.

Overall, the findings demonstrate that compliance gaps, weak institutional capacity, fragmented civil society action, and limited state–civil society engagement were systemic challenges across the project states. The evidence underscores the relevance of the Project's focus on strengthening regulatory awareness, institutional capacity, networking, and engagement mechanisms, thereby validating its Theory of Change that positions regulatory knowledge and constructive engagement with public institutions as key pathways for strengthening civic space

5.1.2. Perceived Relevance

An overwhelming 92.3% of respondents affirmed that the project addressed their challenges to a great or moderate extent. Importantly, 100% of respondents found the project activities were relevant to their operational needs, with 76.9% rating them as highly relevant.

Table 5: Relevance Ratings

Indicator	Response Category	Percentage
B1 – Extent Project addressed challenges	To a great extent	66.7%
	To a moderate extent	25.6%
	To a small extent	7.7%
B3 – Relevance to operational needs	Highly relevant	76.9%
	Somewhat relevant	23.1%
	Not relevant	0.0%

Table 6: Cross-State Summary — Relevance

State	% addressing challenges (great or moderate extent)
Oyo	60%
Ogun	100%
Osun	100%
Anambra	100%
Ebonyi	80%
Cross River	100%
Akwa Ibom	100%
Overall	92.3%

Oyo recorded the lowest relevance score (60%), reflecting greater heterogeneity in pre-project needs across its surveyed organisations. Five states achieved 100%, confirming strong alignment between project design and CSO operating constraints.

Analysis of the FGD and KII findings shows that the project was highly relevant and responsive to the needs of CSOs operating within Nigeria's evolving civic and regulatory environment. Across all seven target states, respondents reported that the interventions addressed critical gaps in regulatory compliance, organizational management, advocacy, networking, and engagement with government institutions. While these challenges were common across the states, their manifestations varied. In Cross River and Osun, respondents emphasized limited knowledge of compliance requirements and regulatory obligations, whereas participants in Anambra and Ebonyi highlighted weak engagement between CSOs and government actors. In Oyo and Ogun, respondents placed greater emphasis on organizational sustainability, advocacy capacity, and strengthening institutional systems.

The project's Community of Practice (CoP) approach emerged as one of its most valued components, providing a platform for peer learning, networking, collective advocacy, and information sharing among CSOs. Beneficiaries reported that the trainings and engagements enhanced their understanding of regulatory frameworks, improved organizational systems, and increased their confidence in interacting with public institutions. As a participant in Ogun State explained, *“the training... was quite engaging because they took us through a whole lot from compliance to organizational sustainability to how we can engage with the government, and also engaged in civic engagement”* (02-KII-OG-CSO-May 2026).

Respondents across the states also highlighted the project's role in strengthening relationships between CSOs and government institutions. Through structured engagements with regulators, legislators, and other accountability actors, the project helped address longstanding communication gaps and fostered greater mutual understanding. In states such as Anambra and Osun, where respondents had previously reported limited interaction between CSOs and public institutions, the project created opportunities for dialogue that improved trust and increased CSOs' participation in governance processes. Participants noted that they became better equipped to engage government actors, advocate for policy issues, and navigate the regulatory environment. As one respondent

observed, the project enhanced understanding of “*how we can engage with the government*” while also strengthening organizational sustainability within a changing civic space (02-KII-OG-CSO-May 2026).

Overall, the findings indicate that the project effectively combined capacity strengthening, regulatory awareness, networking opportunities, and stakeholder engagement mechanisms to address both common and context-specific challenges facing CSOs. The intervention was therefore well aligned with the operational realities and long-term needs of beneficiary organizations across the target states, contributing to stronger institutional capacity, improved regulatory compliance, and enhanced civic participation.

5.2. Assessment of Project Effectiveness

5.2.1. Participation in Project Activities

Regulatory compliance training was the most widely accessed activity, with over 9 in 10 respondents participating. CoP meetings achieved a solid 69.2% participation rate. Legislative engagement (33.3%) reflects structural barriers to access.

Table 7: Participation in Project Activities

Project Activity	% of Respondents
Regulatory compliance training	92.3%
Community of Practice (CoP) meetings	69.2%
Engagements with regulators	43.6%
Engagements with legislators	33.3%

5.2.2. Regulatory Knowledge and Capacity

87.2% of respondents rated their regulatory understanding as good or very good post-project. 92.3% reported improvement in their navigational capacity. These findings represent a marked shift from the pre-project baseline, where the majority identified low compliance awareness as a primary challenge.

Table 8: Post-Project Regulatory Understanding

Rating	% of Respondents
Very good	41.0%
Good	46.2%
Fair	10.3%
Poor	0.0%

Further responses from FGDs and KIIs confirmed that the trainings and engagements significantly enhanced participants' understanding of taxation, reporting obligations, organizational governance, regulatory compliance, and engagement with government institutions. Across the project states, respondents reported that the project demystified complex regulatory processes and provided practical guidance on navigating the civic and regulatory environment. In Osun and Cross River states,

participants particularly emphasized improved understanding of compliance requirements and interactions with regulatory agencies. As one respondent noted, *“the project opened our eyes to compliance issues and helped us understand what government agencies expect from civil society organizations”* (02-FGD-OS-CSO-May 2026).

Beyond regulatory awareness, participants reported improvements in organizational systems and institutional practices. Respondents from Ogun, Oyo, and Ebonyi States highlighted enhanced documentation processes, financial reporting systems, and internal governance structures, which contributed to greater organizational credibility and accountability. Several CSOs indicated that they had reviewed or strengthened their internal procedures to align with compliance requirements. As one participant explained, *“we now have a clearer understanding of how to position our organization to remain compliant and credible”* (06-KII-OG-CSO-May 2026).

The findings also suggest that the project contributed to increased confidence among CSOs in engaging public institutions and participating in governance processes. In states such as Anambra and Osun, where respondents previously reported limited interaction with regulators and government actors, participants described feeling better equipped to engage stakeholders, advocate on policy issues, and represent their organizations more effectively.

Overall, the findings demonstrate that the project effectively strengthened regulatory awareness, organizational capacity, and institutional resilience among beneficiary CSOs. While the specific areas of improvement varied across states, the evidence consistently shows that the intervention enhanced CSOs' ability to operate sustainably, comply with regulatory requirements, and engage more confidently within Nigeria's civic space.

Table 9: Improvement in Regulatory Navigation Capacity

Rating	% of Respondents
Improved significantly	59.0%
Improved slightly	33.3%
Remained the same	2.6%
Worsened	5.1%

Table 10: Improvements in Specific Compliance Areas

Compliance Area	% of Respondents
CAC filings	61.5%
FIRS/SIRS obligations	20.5%
SCUML	7.7%
NHIA / NSITF / ITF	5.1%
PENCOM	2.6%

“The most significant benefit was that I was able to register my organisation with CAC, obtain my SCUML certificate without hassle, and consequently opened my organisation’s bank account.”

— **Executive Director, Akwa Ibom State**

“My organisation has now become more informed on how best to be regulatory compliant, and it has enabled us to do CAC and FIRS filings. The Project gave us practical steps, not just theory.”

— **CSO Leader, Ogun State**

Table 11: Cross-State Summary — Effectiveness

State	% rating regulatory understanding good or very good
Oyo	40%
Ogun	100%
Osun	100%
Anambra	100%
Ebonyi	100%
Cross River	71%
Akwa Ibom	100%
Overall	87.2%

Oyo recorded the lowest post-project regulatory understanding score, with 2 of 5 organisations (40%) rating their understanding as good or very good and the remaining three rating it as fair. Separately, on navigational capacity, two Oyo organisations reported a worsening compared to before the project, the only instances of regression recorded across all seven states, a finding that warrants targeted follow-up in future programming. Cross River achieved 71% on regulatory understanding. The remaining five states all reached 100%.

Table 12: Assessment of Output Level Indicators

Indicators Reference No.	Indicators	Target	Endline / Current Status	Overall Assessment
Output 1.1.1	Improved regulatory compliance among NGOs in 7 states	320 NGOs in 7 states are able to effectively navigate the regulatory environment for	The trained 473 CSOs have demonstrated improved knowledge and understanding of the regulatory regime and have developed action	Achieved

		improved operations	plans to facilitate full compliance	
Output 1.1.2	Number of policies and bills influenced by collective CSO action	A unified regulatory framework for CSOs at the subnational level	A draft model policy and bill has been validated by the CoP and is being carried forward for passage by the States with Akwa Ibom currently adapting it in concert with the Deputy Speaker of the HoA who has promised to shepherd the bill to passage	Progress Substantially achieved
Output 2.1.1	5 subnational CSOs conferences on the regulatory environment	Facilitate the creation of a platform for CSOs, lawmakers and regulators at the subnational level to meet and discuss issues of improved CSOs operations	The activity commenced as planned in Year 2, with three regional conferences on the CSO regulatory environment conducted in 2024, followed by another three in 2025. This demonstrates that implementation exceeded the original target of five regional conferences, reflecting strong progress and expanded outreach	Fully achieved and exceeded
Output 2.1.2	Power mapping conducted across target states	Power mapping reports produced	Power mapping completed and relevant stakeholders identified	Achieved
Output 3.1.1	Collation of existing civic space laws and regulations	Comprehensive compendium developed	Collation completed, and the compendium is assisting the state CoP in their advocacy for a harmonized regulatory framework at the state	Achieved
Output 4.1.1	Frequency of CSOs coordinated engagements with lawmakers	Sustained coordinated CSOs engagements with lawmakers	Coordinated engagements with lawmakers were initiated in Year 2 as planned and implemented across all project states. While the level and scope of engagement varied by state, the activity	Progress Partially Achieved

			demonstrated good progress in fostering collaboration with lawmakers.	
Output 4.1.2	Strategic engagements with key lawmakers on improving the CSO regulatory environment in the state	CSOs are able to effectively engage with lawmakers to facilitate an improved regulatory environment for CSOs operations in the state	Coordinated engagements with lawmakers were implemented following the commencement of activities in Year 2. Media reports and follow-up meetings with legislators provide evidence of implementation, although additional documentation on the scale and outcomes of the engagements would support a more robust assessment.	Progress Partially Achieved
Output 5.1.1	Protocol for state mapping of CSO environment developed	Validated protocol developed	The protocol was developed and validated successfully	Achieved
Output 5.1.2	Mapping of the CSO operational environment across 36 states and the FCT	National mapping conducted	Mapping exercise completed and findings presented to stakeholders	Achieved
Output 5.1.3	Operational civic space dashboard developed and launched	Functional and publicly engaged dashboard	Dashboard developed and launched in June 2024	Achieved

5.3. Efficiency

84.6% of respondents rated project delivery as good or very good. All respondents found platforms at least somewhat accessible. 92.3% confirmed that the benefits fully justified their time investment. Key efficiency gaps include short training durations, absence of resident project staff in target states, and limited operational funding for state steering committees.

The quality of project management in general was good. Regular (quarterly) planning and review exercises were conducted. The monitoring system was well designed and implemented effectively. An M&E plan was established based on the logframe indicators and updated quarterly using an M&E tracking system. Regular monitoring and reporting were ensured. The modality of external evaluation of all project activities assessed the interventions' quality and thus contributed to the efficient implementation of frameworks.

The evaluation concluded that the project delivered most of the planned outputs on time. Where delays occurred, they were primarily attributable to delays in legislative processes and the availability of lawmakers, factors that were beyond Global Rights' control. Resources (financial, human, and technical) were strategically allocated to achieve the project outcomes. The Global Rights organisational structures, managerial support and coordination mechanisms effectively supported the delivery of the project, but there is room for improvement.

Table 13: Efficiency Ratings

Indicator	Response Category	Percentage
D1 – Rating of project delivery	Very good	35.9%
	Good	48.7%
	Fair	15.4%
D2 – Accessibility of project platforms	Highly accessible	66.7%
	Somewhat accessible	33.3%
D3 – Benefits justified the time invested	Yes	92.3%
	Partly	7.7%

Table 14: Cross-State Summary — Efficiency

State	% confirming benefits justified time investment
Oyo	80%
Ogun	100%
Osun	100%
Anambra	100%
Ebonyi	100%
Cross River	71%
Akwa Ibom	100%
Overall	92.3%

Five states recorded 100% on the benefits-justified-investment indicator. Cross River (71%) recorded the lowest score, with two organisations partly satisfied. Oyo (80%) also fell below the overall average of 92.3%.

FGDs and KIs revealed that respondents across the project states generally appreciated the structured coordination, quality of facilitation, and regular engagement mechanisms established by Global Rights. Participants highlighted the consistency of trainings, review meetings, Community of Practice (CoP) engagements, and stakeholder dialogues, which fostered continuous learning, collaboration, and information sharing among CSOs and regulatory actors. Respondents particularly valued the practical nature of the sessions and their direct relevance to organizational needs. As one

participant in Ebonyi noted, *“the project was well coordinated and the sessions were practical and relevant to our work”* (06-FGD-EBY-SG, May 2026).

The evaluation further found that the project's management, coordination, and monitoring systems contributed positively to implementation efficiency across the target states. Respondents acknowledged the regular planning and review processes, effective communication channels, and technical support provided by Global Rights throughout implementation. These mechanisms enabled timely delivery of activities and facilitated coordination among CSOs, regulators, and other stakeholders. In states such as Ogun, Oyo, and Cross River, participants particularly appreciated the consistency of engagements and the opportunities to interact with both peers and government actors. The project's monitoring and evaluation framework also supported adaptive implementation by enabling routine progress tracking, periodic reviews, and timely reporting. Participants noted that project activities remained responsive to emerging needs, while external reviews and monitoring processes contributed to quality assurance and accountability.

Despite these strengths, respondents identified several operational challenges. Across multiple states, participants reported that the duration of some trainings was insufficient to fully address complex regulatory, compliance, and organizational management issues. This concern was particularly evident among CSOs seeking more in-depth guidance on taxation, reporting obligations, and organizational sustainability. In addition, respondents from several states highlighted the absence of resident project personnel, which occasionally limited follow-up support, mentoring, and coordination after training activities.

Another recurring issue was the limited operational resources available to state steering committees. While the committees played an important role in sustaining engagement and coordinating activities, respondents indicated that inadequate funding constrained their ability to conduct follow-up activities and maintain momentum between project events. As one participant explained, *“the project activities were useful, but more follow-up support at the state level would have strengthened implementation further”* (04-KII-AKIB-CSO, May 2026)

5.4. Impact

5.4.1. Organisational-Level Changes

Improved confidence in engaging regulators was the most widely reported change (76.9%), directly reversing the pre-project landscape where limited regulator engagement was the second most cited challenge. Increased CSO collaboration (69.2%) reflects the network-building dividends of the CoP model. Improved credibility (64.1%) and reduced fear of sanctions (56.4%) point to deeper attitudinal and institutional shifts.

Table 15: Reported Organisational Changes

Observed Change	% of Respondents
Improved confidence in engaging regulators	76.9%
Increased collaboration with other CSOs	69.2%
Improved organisational credibility	64.1%
Reduced fear of regulatory sanctions	56.4%
Improved confidence in engaging legislators	41.0%

The evaluation findings demonstrate that the project contributed to significant organizational-level changes among beneficiary CSOs across the target states. Participants reported improvements in institutional governance, compliance practices, advocacy engagement, documentation systems, and overall operational confidence. Many organizations indicated that the project strengthened their internal structures and enhanced their ability to function more effectively within Nigeria's evolving regulatory environment.

Survey responses and qualitative findings indicate that the project contributed significantly to improving regulatory awareness, organizational management, and institutional capacity among beneficiary CSOs. Across the target states, respondents reported increased knowledge of regulatory obligations and the adoption of stronger administrative, financial, and governance practices. Several participants explained that the project encouraged organizations to formalize internal processes, strengthen reporting mechanisms, and improve record-keeping systems. This was particularly evident in Ogun and Cross River states, where respondents highlighted improvements in compliance documentation and organizational structures. As one participant explained, *"before the training, many of us were not paying attention to compliance documentation, but now we understand the importance of proper structures and reporting"* (03-FGD-OG-CSO-May 2026).

The project also strengthened collaboration and networking among CSOs through the Community of Practice (CoP) model. Across all states, participants reported increased interaction, information sharing, and peer learning among organizations that had previously operated independently. Respondents in Anambra, Oyo, and Ebonyi particularly emphasized that the CoP created opportunities for coordinated advocacy and collective engagement on civic space issues. In several states, organizations further reported improved visibility and recognition from government institutions and development partners as a result of enhanced organizational systems and increased participation in policy and governance discussions.

Furthermore, the evaluation found that the project increased the confidence and capacity of civic actors to engage policymakers, regulators, and accountability institutions. Respondents noted that they now better understand advocacy processes, stakeholder engagement strategies, and avenues for influencing policy discussions. This was especially evident in Anambra and Osun States, where participants described increased confidence in engaging government actors and representing civic interests. As one respondent stated, *"the project gave us the confidence to engage stakeholders and speak more authoritatively on civic and governance issues"* (KII-AN-CSO-02, May 2026).

While the improvements were consistent across the project states, some differences emerged in the areas of greatest change. Ogun and Cross River respondents focused more on improvements in compliance, governance, and organizational systems; Anambra and Osun participants emphasized enhanced advocacy capacity and engagement with public institutions, while respondents in Oyo and Ebonyi highlighted the value of networking, collective action, and strengthened relationships among CSOs.

Overall, the findings suggest that the project strengthened the institutional resilience, professionalism, and sustainability of beneficiary CSOs. By improving regulatory compliance, organizational systems, networking opportunities, and advocacy capacity, the intervention positioned participating

organizations to operate more effectively, engage more confidently with public institutions, and contribute more meaningfully to civic space and governance processes across the target states.

5.4.2. Civic Space-Level Impact

87.2% assessed the project's contribution to civic space improvement as moderate or great. Significantly, 66.7% observed policy, administrative, or behavioural changes by regulators or lawmakers linked to the project, a remarkable finding for a three-year subnational intervention.

Table 16: Civic Space Level Impact

Indicator	Response Category	Percentage
E2 – Civic space contribution	To a great extent	41.0%
	To a moderate extent	46.2%
	To a small extent	10.3%
	Not at all	2.6%
E3 – Observed policy/regulatory changes	Yes	66.7%
	Not sure	20.5%
	No	12.8%

Table 17: Cross-State Summary — Impact

State	% assessing civic space improved (moderate or great extent)
Oyo	60%
Ogun	100%
Osun	100%
Anambra	100%
Ebonyi	100%
Cross River	57%
Akwa Ibom	100%
Overall	87.2%

Cross River recorded the weakest civic space impact score (57%), with one organisation reporting no improvement, the only such response across the evaluation. Oyo (60%) was also below the national average. The remaining five states all achieved 100%.

At the broader civic space level, analysis of qualitative responses found that the project contributed positively to improving relationships between civil society actors and public institutions while also strengthening collective advocacy and dialogue on civic space issues. The intervention promoted increased interaction between CSOs, legislators, regulatory agencies, and accountability actors, helping to reduce mistrust and create more constructive engagement platforms.

Participants across the target states reported that the project improved awareness of civic rights, regulatory responsibilities, and the role of civil society in governance processes. Through Community of Practice (CoP) platforms, stakeholder dialogues, and consultations, CSOs collectively discussed challenges affecting civic space and identified strategies for coordinated advocacy and action. Respondents consistently noted that these engagements strengthened solidarity among civic actors, enhanced information sharing, and improved their collective ability to respond to emerging regulatory and operational challenges.

The evaluation also found evidence that the project enhanced the visibility, credibility, and legitimacy of CSOs among government stakeholders. Across several states, participants reported that government agencies became more willing to engage with civil society organizations following project-supported dialogues and advocacy efforts. This change was particularly evident in Cross River and Anambra, where respondents described improved communication and increased opportunities for interaction between CSOs and public institutions. As one respondent observed, *“there is now a better understanding between government agencies and civil society groups because of the conversations created through the project”* (02-FGD-CRV-CSO, May 2026).

State-level variations were also evident. In Cross River and Osun, respondents emphasized improved awareness of regulatory obligations and greater engagement with regulators. In Anambra and Oyo, participants highlighted increased confidence among CSOs to engage policymakers and advocate on governance issues. Meanwhile, respondents in Ebonyi and Ogun more frequently pointed to strengthened collaboration among CSOs and improved coordination through the Community of Practice platform, which helped organizations pursue common advocacy objectives and share experiences.

The project further contributed to strengthening state-level accountability and reform platforms by facilitating sustained interaction among CSOs, regulators, legislators, and other governance actors. Participants reported that these engagements created safer and more coordinated spaces for dialogue, advocacy, and collective action within an increasingly restrictive civic environment. The Community of Practice mechanism was particularly valued for fostering ongoing collaboration and enabling organizations to collectively address issues affecting civic space.

Overall, while respondents acknowledged that broader structural and regulatory challenges remain, the findings indicate that the project made important contributions to strengthening civic engagement, improving state–civil society relations, and enhancing the collective capacity of CSOs to advocate for and protect civic space. Across the states, the intervention helped foster stronger networks, increased trust between stakeholders, and created more opportunities for constructive engagement on governance and policy issues.

Table 18: Assessment of Impact and Outcome Level Indicators

Indicators Reference No.	Indicators	Target	Endline / Current Status	Overall Assessment
Impact 1.1	7 active subnational Communities of Practice (CoPs) established and functional	7 active subnational CoPs	All 7 states established CoP structures and commenced activities	Achieved
Impact 1.2	16 capacity building engagements with CSOs in 7 states on the regulatory compliance framework	16 trainings conducted	38 trainings were conducted across 473 CSOs	Achieved
Impact 1.3	Effective CSO allyships and engagement with lawmakers	7 lead sponsors championing the harmonization of CSO regulatory requirements in the State Legislature	The harmonization policy was drafted at the state level and is currently awaiting approval by the relevant state authorities for adoption and implementation	Significant Progress Achieved
Outcome 1.1	Increased capacity of CSOs on the existing regulatory compliance framework for their operations in Nigeria	320 CSOs in 7 states receive training on the regulatory compliance framework to improve their operations	473 CSOs trained	Achieved
Outcome 1.2	Volume and frequency of interaction among CSOs, lawmakers and regulators on improving CSOs operations	Annual Minimum of 3 meeting reports each from state network	All states have had meetings with lawmakers and regulators on improving the CSO operational environment in their states. Advocacy visits to the SCUML	Achieved

			Director, CAC Registrar General, Deputy Speaker of Akwa Ibom State House of Assembly, and National Commissioner of the Nigeria Data Protection Commission have also been conducted	
Outcome 2.1	Frequency of CSO response to national interventions that have a direct impact on subnational CSOs' regulatory environment	3 subnational engagements with national-level activities with direct impact on the subnational CSOs regulatory environment	The CoP collaborated with House of Representative Committee on Civil Society and Development Matters, House of Representative Committee on Rules and Business, other lawmakers and House Members to co-host a strategy meeting that reviewed and discussed a proposal for an amendment bill to the Companies and Allied Matters Act (CAMA) 2020 with a focus primarily on the part that regulates the NGO Sector in Nigeria.	Substantial progress Achieved

Outcome 2.2	Bi-annual subnational coordination and dialogue platforms	Platforms for frequent engagement have been established	6 regional conferences were held covering South-south, southeast and south-west regions	Achieved
Outcome 3.1	Number of policies and bills identified and harmonized for civic space reform	Unified regulatory framework discussions facilitated	The project successfully supported the development of a draft model harmonization policy which has been validated by the CoP and is being carried forward for passage by the States with Akwa Ibom currently adapting it in concert with the Deputy Speaker of the HOA who has promised to shepherd the bill to passage	Progressed Partially Achieved
Outcome 4.1	Advocacy for inclusion of amendments to civic space-related legislation	Inclusion of amendments and stronger advocacy coordination	Project synergized with the ACT programme and engaged lawmakers on reform issues	Progress Substantially achieved
Outcome 5.1	Item 32 Part 1 of the 2nd Schedule of the 1999 Constitution, debated at the National Assembly, to provide clarity to the context and make it possible for subnational governments to incorporate CSOs as corporate entities	Inclusion of the amendment of Item 32, Part 1 in the next Constitution review process	A memo has been submitted to the National Assembly Committee on Constitutional Review	

Outcome 6.1	Ranking dashboard to monitor each state's reactivity and responsiveness to civil society operations in the 36 states and the FCT	A functional dashboard that measures the landscape of the CSO regulatory environment in Nigeria	Dashboard developed and launched during the South-South Regional Conference in June 2023, and currently updated with 2025 data	Achieved
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5.5. Sustainability

94.9% indicated they are likely or very likely to continue applying their regulatory knowledge after project closure. Notably, no respondent believed the CoP would not continue, a testament to CSO ownership of the model.

Table 19: Sustainability Indicators

Indicator	Response Category	Percentage
F1 – Likelihood of continuing to apply knowledge	Very likely	79.5%
	Likely	15.4%
	Unlikely	2.6%
	Very unlikely	2.6%
F2 – CoP will continue beyond the Project	Yes	69.2%
	Possibly	30.8%
	No	0.0%

Table 20: Sustainability Factors

Factor	Percentage
Availability of funding	76.9%
Strengthening of CoPs	53.8%
Continued engagement with regulators	46.2%
Strength of CSO networks	46.2%
CSO ownership	43.6%
Continued engagement with lawmakers	35.9%

Table 21: Cross-State Summary — Sustainability

State	% very likely or likely to continue applying knowledge
Oyo	80%
Ogun	100%
Osun	100%
Anambra	100%
Ebonyi	80%
Cross River	100%
Akwa Ibom	100%
Overall	94.9%

Sustainability intent was uniformly high across all states. Five states reached 100%. Oyo and Ebonyi both recorded 80%, with one organisation in each expressing doubt about continuing to apply project knowledge post-closure. Notably, no organisation in any state believed the Community of Practice would not continue.

The evaluation findings suggest that the project demonstrated promising indications of sustainability, particularly through strengthened institutional capacity, improved stakeholder relationships, and the establishment of collaborative platforms among CSOs and governance actors. Evidence from FGDs and KIIs indicates that beneficiary organizations across the target states have continued to apply the knowledge, tools, and engagement approaches acquired through the project, particularly in the areas of regulatory compliance, organizational governance, advocacy, and stakeholder engagement.

One of the most significant sustainability mechanisms identified was the Community of Practice (CoP) model, which established enduring peer-learning and collaboration platforms among CSOs. Across the states, respondents reported that the relationships, networks, and communication channels created through the project have continued beyond individual project activities, enabling organizations to exchange information, coordinate advocacy efforts, and collectively address emerging civic space challenges. This was particularly evident in Oyo, Ebonyi, and Osun states, where participants emphasized the value of sustained collaboration among civil society actors. As one respondent noted, *“the relationships built through the project will continue because organizations now know who to engage and collaborate with”* (01-FGD-OS-CSO-May 2026).

The evaluation also found evidence that many beneficiary organizations had institutionalized improved compliance and organizational management practices introduced through the project. Respondents from Ogun, Cross River, and Ebonyi reported continued application of strengthened reporting systems, documentation practices, governance structures, and regulatory compliance mechanisms. These improvements were viewed as enhancing organizational credibility, accountability, and resilience. As one participant explained, *“the capacity we gained is something we will continue using even after the project has ended”* (03-KII-EB-CSO-May 2026).

The project's engagement with regulators, legislators, and accountability institutions further strengthened prospects for sustainability by fostering relationships and communication channels that are likely to persist beyond the intervention period. Respondents in Anambra and Cross River particularly highlighted improved dialogue between CSOs and public institutions, noting that the project helped establish pathways for continued engagement on civic space, governance, and policy issues. These relationships were perceived as critical for sustaining advocacy efforts and promoting a more enabling operating environment for civil society.

Despite these positive outcomes, respondents identified several factors that could affect long-term sustainability. Across the states, concerns were raised regarding limited funding opportunities for CSOs, weak institutional resources at the state level, and inadequate operational support for state steering committees. These concerns were more pronounced among smaller and community-based organizations, particularly in states where local funding opportunities remain limited. Respondents cautioned that sustaining coordination, advocacy, and follow-up engagements may become increasingly challenging without continued technical support and resource mobilization efforts.

While the challenges varied in intensity across states, a common concern was the sustainability of state-level coordination mechanisms once project funding ends. Respondents generally expressed confidence that the knowledge, relationships, and institutional systems developed through the project would endure but noted that maintaining the momentum of collective action and stakeholder engagement would require ongoing commitment from participating organizations and key governance actors.

Overall, the evidence suggests that the project established strong institutional and relational foundations for sustainability. The combination of enhanced regulatory knowledge, strengthened organizational systems, active Community of Practice networks, and improved engagement with public institutions has positioned beneficiary CSOs to continue advancing civic engagement and organizational development beyond the project period. Although financial and operational constraints remain, the project's investments in capacity strengthening and stakeholder relationships provide a solid basis for sustaining outcomes over the longer term.

5.6. Coherence

89.7% affirmed strong or moderate complementarity with other CSO support initiatives. 84.6% confirmed full alignment with national/state civic space reforms. No respondents found the project to be incoherent with the broader policy environment.

Table 22: Coherence Ratings

Indicator	Response Category	Percentage
G1 – Project complemented other initiatives	Strongly	53.8%
	Moderately	35.9%
	Slightly	10.3%

G2 – Aligned with national/state reforms	Yes	84.6%
	Partly	15.4%
	No	0.0%

Table 23: Cross-State Summary — Coherence

State	% affirming strong or moderate complementarity with other initiatives
Oyo	60%
Ogun	100%
Osun	100%
Anambra	100%
Ebonyi	100%
Cross River	71%
Akwa Ibom	100%
Overall	89.7%

Five states recorded 100% on complementarity with other CSO support initiatives. Oyo (60%) and Cross River (71%) recorded the lowest coherence scores. Importantly, no organisation in any state rated the project as incoherent with the broader national or state-level policy environment.

5.7. Overall Project Rating

92.3% of respondents rated the project overall as good or excellent, with no respondent rating it as poor or very poor. This is among the strongest overall endorsements achievable in an end-of-project evaluation.

Table 24: Overall Project Rating

Rating	Percentage
Excellent	35.9%
Good	56.4%
Fair	7.7%
Poor	0.0%
Very poor	0.0%

Table 25: Cross-State Summary — Overall Rating

State	% rating the project good or excellent overall
Oyo	80%
Ogun	100%
Osun	100%

Anambra	100%
Ebonyi	100%
Cross River	71%
Akwa Ibom	100%
Overall	92.3%

Five of seven states achieved 100% of their ratings as good or excellent overall. Osun was the only state where all organisations rated the project as excellent. Cross River (71%) and Oyo (80%) recorded the weakest overall ratings, though no organisation in any state gave a poor or very poor rating.

The evaluation findings indicate that the project demonstrated a high level of coherence both internally across its intervention components and externally with broader civic space, governance, and accountability initiatives in Nigeria. The project's design effectively combined capacity strengthening, regulatory awareness, stakeholder engagement, and networking approaches in a complementary manner, ensuring that activities reinforced one another toward achieving the overall objective of strengthening civic space and CSO resilience.

Internally, respondents observed that the different project components were well-linked and mutually reinforcing. Trainings on compliance and regulatory frameworks complemented advocacy engagements and Community of Practice activities, while stakeholder dialogues strengthened the practical application of knowledge gained through capacity-building sessions. Participants noted that the sequencing of activities enabled organizations to progressively build understanding, improve institutional systems, and apply learning through engagement with public institutions and peer networks.

The project also aligned well with the operational realities and priorities of CSOs working within Nigeria's civic environment. Respondents explained that the intervention complemented existing efforts by civil society actors to promote accountability, democratic governance, and protection of civic space. In several states, participants reported that the project strengthened ongoing advocacy initiatives and provided additional platforms for collaboration among organizations working on similar governance and human rights issues.

The evaluation further found that the project maintained strong coherence with national regulatory and governance frameworks by facilitating constructive engagement between CSOs, regulatory agencies, and legislative actors. Across the target states, respondents reported that the project promoted dialogue, mutual understanding, and collaborative problem-solving around compliance, accountability, and civic participation issues. Rather than positioning civil society and government institutions as opposing actors, the intervention encouraged engagement and relationship-building, helping to reduce tensions and improve communication. As one respondent in Ogun State explained, *“the project created a balance between helping CSOs understand regulations and encouraging government institutions to engage civil society more openly”* (01-KII-OG-CSO-May 2026).

The project also demonstrated coherence by aligning its capacity-strengthening interventions with broader governance and accountability objectives. Training activities on regulatory compliance, organizational governance, and advocacy were complemented by Community of Practice engagements, stakeholder dialogues, and interactions with regulators and policymakers. This integrated approach ensured that improvements in CSO knowledge and capacity were reinforced through practical opportunities for engagement and collaboration.

Participants further noted that the intervention complemented existing accountability and reform initiatives at the state level rather than duplicating them. In states such as Anambra, Oyo, and Ebonyi, respondents highlighted how the project strengthened linkages among civic actors and existing governance structures, creating opportunities for coordinated advocacy and collective action. Similarly, respondents in Cross River and Osun emphasized that the project built upon existing relationships with regulators while providing practical mechanisms for improving engagement and information sharing.

The evaluation also found evidence that the different components of the project worked synergistically. Capacity-building activities improved regulatory awareness and organizational systems; Community of Practice platforms strengthened networking and peer learning; while engagements with regulators, legislators, and accountability institutions created opportunities to apply acquired knowledge in real-world governance processes. This complementarity was frequently cited by respondents as one of the project's key strengths, as it addressed both the internal capacity needs of CSOs and the external factors affecting civic space.

While coherence was evident across all states, the specific areas of contribution varied. Respondents in Ogun and Cross River emphasized the alignment between compliance training and engagement with regulatory institutions, while participants in Anambra and Oyo highlighted the coherence between networking platforms and advocacy efforts. In Ebonyi and Osun, respondents more frequently pointed to the value of linking organizational strengthening activities with broader civic engagement and policy dialogue processes.

Overall, the evaluation concludes that the project was highly coherent in both design and implementation. Its various components reinforced one another to strengthen CSO capacity, improve state–civil society relations, and support broader civic space and governance objectives. By building on existing structures, promoting constructive engagement, and integrating capacity strengthening with stakeholder dialogue, the intervention contributed to a more coordinated and enabling environment for civil society action across the target states.

III. Challenges, Lessons Learned and Best Practices

6. Implementation Challenges Encountered

The following key implementation challenges were documented during the evaluation.

- Short training durations (one to two days) were widely described as insufficient to cover the breadth of regulatory compliance content.
- Project staff not being based in target states created coordination gaps and limited the depth of ongoing support.
- Volunteer-driven steering committees and CoP bodies operated without consistent operational or communication funding, straining sustainability.
- Key government stakeholders were not consistently present at project activities, limiting the depth of multi-stakeholder dialogue.
- The project began gaining significant momentum close to its close-out, reducing the time available to consolidate institutional gains.
- The project's mobilisation approach largely underserved rural and community-based organisations.
- No structured grant or technical support window existed to help CSOs meet direct compliance costs.

7. Lessons Learned and Best Practices

Compliance-as-Credibility Framing

Positioning regulatory compliance as an organisational credibility and donor-eligibility asset, not a bureaucratic burden, resonated powerfully with CSOs. This framing shift was a key driver of behavioural change and should be embedded in all future civic space programming.

Community of Practice as a Durable Learning Platform

The CoP model proved highly effective in building peer learning networks, reducing isolation, and creating platforms for collective action. Its near-universal sustainability intent (100% of respondents expecting CoPs to continue) validates it as a replicable good practice. Future phases should formalise CoP governance structures and provide dedicated secretariat support.

Political Economy Awareness in Regulatory Engagement

The project's grounding in political economy analysis was a critical design strength. Effective CSO-regulator facilitation required understanding the incentive structures and institutional cultures of individual agencies. Future programming should deepen this lens and use it explicitly to guide advocacy sequencing.

Multi-Stakeholder Platform Architecture

The project's investment in multi-stakeholder platforms created durable relationships and structured dialogue channels that extend beyond the project lifecycle. This is a good practice for environments where CSO-government relations have historically been adversarial or transactional.

Importance of In-State Presence

Feedback from beneficiaries across all seven states consistently highlighted that the absence of resident project staff was a significant efficiency and responsiveness gap. Embedding in-state liaisons enables deeper trust-building, responsiveness, and adaptive capacity.

IV. Final Thoughts and Conclusions

8. Summary and Conclusions

The evaluation process has shown that the implemented interventions have been both relevant and appropriate to the needs of CSO beneficiaries in all seven target states. An overwhelming 92.3% of respondents confirmed that the project addressed their key regulatory and operational challenges, and 100% found the project activities relevant to their needs.

The project was well designed; the objectives were clearly defined, the intervention logic was appropriate, and the implementation approach ensured high engagement with CSOs, regulators, legislators, and multi-stakeholder platform members throughout the project lifecycle. The Theory of Change, which posits that improved CSO capacity, institutional trust, and policy coherence are mutually reinforcing, has been substantially validated by the evaluation findings.

Several areas of notable achievement stand out:

- Increased CSO capacity on regulatory compliance: measurable improvements in regulatory knowledge, compliance practices, and confidence across all seven states.
- Improved relationships between CSOs and state institutions: CoPs and multi-stakeholder platforms created structured channels of communication that did not previously exist.
- CoP sustainability: CSO beneficiaries unanimously expect the CoP to continue, with emerging peer champions actively sustaining it without prompting from the project.
- Systemic influence: 66.7% of respondents observed policy, administrative, or behavioural changes by regulators or lawmakers linked to the project.
- Overall rating: 92.3% rated the project as good or excellent. No respondent rated it as poor.

The project has provided a strong foundation for a second phase that could consolidate and scale these gains, deepen legislative and constitutional advocacy, and address the structural funding gap that remains the primary threat to long-term sustainability.

“To make the process predictable, transparent, and supportive: when CSOs see regulators as facilitators rather than gatekeepers, compliance rates and trust both go up. This Project started that journey. We need it to continue.”

— CSO Representative, Akwa Ibom State

V. Recommendations

9. Recommendations

9.1. For Global Rights and Future Funders

The following key recommendations have been drawn from the findings of the evaluation:

1. Establish dedicated state-level CoP secretariats with modest but consistent operational budgets. The CoP model is the project's most durable institutional contribution. Without reliable funding for meeting logistics, communication, documentation, and coordination, volunteer-driven CoPs risk losing momentum. Future programming should designate at least one paid CoP secretariat position per state.
2. Develop a CSO Compliance Support Fund or matching grant scheme. 76.9% of respondents identified funding availability as the primary sustainability risk. A small-grant facility would directly address compliance cost barriers and exponentially increase the durability of compliance gains.
3. Embed at least one state-level project liaison in each target state. The near-unanimous finding across states that the absence of resident project staff was a significant efficiency gap is clear evidence for this design change. In-state presence enables faster response, deeper relationship-building, and more intensive CSO mentoring.
4. Redesign training as multi-session, modular, competency-based programmes. Two-day training formats were consistently described as insufficient. Future capacity building should adopt modular learning pathways with practical assignments, pre- and post-training assessments, and follow-up support sessions.
5. Deepen legislative and high-level regulatory engagement. Legislative advocacy had the lowest participation and weakest impact of all project activities. Future phases should invest in state-specific advocacy strategies informed by political economy analysis.
6. Integrate grant writing, financial management, and digital security into future curricula. Respondents consistently identified these as critical gaps that limit translation of compliance gains into organisational sustainability.

9.2. For State Governments and Regulatory Bodies

7. Adopt a one-stop-shop model for CSO registration that allows a single ministry-level registration to fulfil requirements across multiple regulatory bodies, dramatically reducing compliance burdens.
8. Establish dedicated CSO desks in state ministries of justice with trained, accessible, and consistent staff mandated to support CSO compliance queries.
9. Create and publish a transparent annual regulatory calendar to help CSOs anticipate and plan for compliance deadlines.
10. Designate liaison officers specifically for CSO engagement and ensure their consistent availability at joint training events and multi-stakeholder platforms.

9.3. For CSOs

11. Formalise internal compliance committees or designate a compliance focal person to sustain regulatory practices post-project.
12. Actively expand CoP membership, with deliberate outreach to rural and community-based organisations that were underserved in the current cycle.
13. Leverage improved compliance status to access new donor opportunities and diversify organisational funding.
14. Engage in peer mentoring within and across states, using knowledge and relationships built through the project to support less-active organisations.

I. Annexes

Quantitative Survey Tool – [Click Here](#)

FGD Tools – [Click Here](#)

KII Tools – [Click Here](#)



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