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Introduction

The 2017 NEITI Work Plan is developed to consolidate on the change mantra of the FGN and to ensure successful transition of the 2013-16 NEITI Strategic plan to 2017-20.

The Plan is intended to:

I. Deepen the ongoing transparency and accountability drive in the extractive sector.

II. Ensure International best practice in EITI Implementation, governance and resource management.

III. Promote the needed debate and advocacy for reforms in the country’s extractive industry.

National and Core Priority Objectives

The National priority objectives of the Federal Government of Nigeria include:

- Economic Diversification
- Corporate governance and Anti-corruption
- State and Regional Development
- Infrastructure and Social Development
- Environmental protection.

Based on the above FGN priorities, the core priority objectives of the NEITI EITI 2017 work plan are:

1. Regular Audit reporting in line with EITI requirement, Automated Data gathering system, implementation of Remedial issues and policy advocacy.

2. Dissemination of NEITI Industry Audits Reports to strategic stakeholders, broaden and deepen engagements with stakeholders at the Sub-national level, and to provide timely information, education and enlightenment on NEITI activities.

4. Provide operational, administrative and logistic support through effective human resource management and manpower development.

5. Evaluate governance and anti-corruption initiatives at all levels of governance and provide data-based coordination.

6. Effective implementation of internal control mechanism through continuous monitoring & evaluation, internal auditing & procurement process.

**Priority Activities**
The key activities to support the achievement of the core objectives for 2017 will include:

- **Regular Audit reporting in line with EITI Guidelines.**

The top most priority activity in the year 2017 will be to sustain the regular reporting and cover the arrears of the Industry Audits (2014 - 2015) as a key requirement of the NEITI Act and the EITI. Key activities to be implemented will include:

- Automation of the Industry Audit data gathering process in order to ensure regular and timely reporting of the audits. This will support NEITI in continuously receiving audit data from all covered entities all through the year thus reducing the time for data collection for the audits.

- Industry Audit monitoring & evaluation and analysis of data collected on the sector and ensure full compliance with the EITI requirement and recommendations of the EITI validation.

- Implementation of efficient interface framework to address remedial issues.

- Review of Transparency and Accountability frameworks.

- Conduct research to provide policy direction in line with evolving global trends in the oil & gas and the solid mineral industries.

- Beneficial Ownership Disclosure - The growing international recognition that anonymous companies constitute potential and real dangers to
the economy and security in the country where they operate. Global attention is drawn to the need for institutionalization and implementation of robust mechanism for beneficial ownership transparency. (EITI Requirement 2.5.a-e). Required information about the identity of the beneficial owner should include the name of the beneficial owner, the nationality, and the country of residence, as well as identifying any politically exposed persons. It is also recommended that the national identity number, date of birth, residential or service address, and means of contact are disclosed (EITI Guidance).

NEITI intends to pursue the Beneficial Ownership Disclosure in 2017 in Nigeria’s best interest and in compliance with the EITI Requirements.

- Open Data Policy - The world has witnessed a global shift towards open data and information, triggered amongst other things by technological advancement as well as the need to increase transparency and accountability. Nigeria has to that effect embraced this global trend. To meet the new standards, countries under the EITI are now required to produce an Open Data Policy by 1st January 2017. According to EITI Requirement 7.1 – (Public Debate) the multi-stakeholder group is required to:
  - Agree a clear policy on the access, release and re-use of EITI data. Implementing countries are encouraged to publish EITI Report under an open license, and to make users aware that information can be reused without prior consent.
  - Make the EITI Report available in an open data format (xlsx or csv) online and publicize its availability.

In 2017 NEITI will make open data information publically available and accessible in a reusable format. Open data will be made available in convenient, modifiable, and open formats that can be retrieved, downloaded, indexed, and searched. Sharing this data enables greater transparency; delivers more efficient public
services; and encourages greater public and commercial use and re-use of government information.

- **Dissemination, Education & Public Enlightenment:**
  This will require deepening and broadening the stakeholder’s base, provision of information, education, and enlightenment to create awareness required by the public to use the report as a tool to demand good governance of the resources and accountability. This will include:
  - Effective use of the media (Print & electronic)
  - Printing/simplification of audit reports
  - Civil society engagements/capacity building
  - Legislative outreach
  - Town hall meetings/staged events
  - Zonal outreach across the country
  - Outreach to schools/colleges
  - Use of the social media
  - Robust website content management.

- **Ensure optimum regulation & compliance with NEITI mandate**
  NEITI has not been able to effectively implement the enforcement and regulation function under the NEITI Act. During the 2017 financial year, NEITI will initiate actions aimed at overcoming this challenge and strengthening the enforcement of recommendations from the Audit reports. These will include:
  - Initiate process for amendment of the NEITI Act to include enforcement and sanctions by the National Assembly.
  - Secure a FIAT from the Attorney General of the Federation in order to prosecute any violation of the Act.
  - Complete the process of signing the MOU with other anti-corruption agencies I.e. EFCC, ICPC and the Nigerian Police as a short term plan
to ensure effective Regulation and Enforcement before the eventual passage of the NEITI amendment Act.

- Continuous engagement with professionals and covered entities for a better understanding of EITI principles and cooperation.

- To provide operational, administrative and logistic support through effective Human Resource Management and Manpower Development. The implementation of NEITI mandate will require operational support by all stakeholders; the 2017 work plan is tailored to develop the human capacity within the organisation.

Secretariat capacity building activities will include:

- Ensure full implementation of the Data Automation System for the organization, knowledge and documentation. NEITI will build capacity of staff to use the application, backup archives data and ensure routine use of the system.

- IT Systems/Infrastructure Improvement to support Audit Automation and Social media communication. IT policies and systems will be developed to assist in implementing IT systems upgrade, NEITI audit automation.

- Systems Review and implementation – IPSA/Internal Controls. NEITI financial and internal control systems will be updated in line with International Public Sector Accounting Standards. Where possible the use of SAP accounting software will be required.

- Create understanding of internal control systems and enforce compliance with such systems i.e Financial Management, Procurement, Internal Audit, Human Resources Management and Monitoring and Evaluation.

- Organize sessions for knowledge sharing and learning. Fortnightly sessions will be organized for staff to enable sharing, learning and building capacity of others. It will be mandatory for every staff participating in any training to share lessons learnt and plans to implement such lessons for the benefit of NEITI.
✓ Sustainable NEITI - Donor partnership: NEITI will explore more sustainable Donor partnership strategies to complement the funding Gap in the NEITI work plan to ensure sustained implementation of EITI in Nigeria.

➢ Evaluate governance and anti-corruption initiatives at all levels of governance and provide data-based coordination

The Technical Unit on Governance and Anti-Corruption Reforms (TUGAR) is a research, monitoring and evaluation unit setup and housed by NEITI to respond to the critical need for a rigorous approach to policy-making grounded on empirical data collection and analysis; and in-depth country specific diagnostics on corruption and related governance issues. TUGAR’s activities build synergy in the works of various agencies and provide a link and synergy with activities of non-state actors. In addition to the main mandate, TUGAR activities in 2017 will be to monitor and evaluate governance and anti-corruption initiatives at all levels of governance and provide data-based coordination among anti-corruption agencies.

➢ Effective implementation of internal control mechanism through continuous monitoring & evaluation, Internal auditing & procurement process.

To ensure that NEITI remains alert to its responsibilities and focus on the strategic direction, continuous monitoring and evaluation of the work plan and sub activities is required to achieve the desired result in line with the core objectives and the strategic objectives of NEITI. Responsible Departments will monitor the plan regularly while the NEITI Secretariat will undertake a quarterly review. The NSWG will ensure effective implementation of the work plan. Quarterly meetings of the NSWG will review implementation and authorize changes where needed. Evaluation of the implementation will be based on the monitoring indicators as outlined in the detailed plan for implementation of specific activities. There shall be a mid-year review of the work plan in July 2017, while effective and efficient procurement plan is designed to ensure timely execution. The internal auditing will
serve as a check and control tool for optimum allocation and utilization of resources.

**Methodology and Funding**
Through a stakeholder’s consultative process the 2017 priorities have been developed and in line with the national priority objective of the FGN. The implementation of the plan will be monitored and evaluated. The attached work plan template provides details of funding, targets, cost, output and key indicators.

**Work plan costing**
Summary of core priorities and funding of the work plan include:

<table>
<thead>
<tr>
<th>Core Priority</th>
<th>Total</th>
<th>FGN</th>
<th>Donor</th>
<th>Gap</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regular Audit Reporting</td>
<td>350,208,500.00</td>
<td>292,268,500.00</td>
<td>57,940,000.00</td>
<td></td>
</tr>
<tr>
<td>Dissemination, Education &amp; Public Enlightenment</td>
<td>171,904,000.00</td>
<td>161,800,000.00</td>
<td>10,104,000.00</td>
<td></td>
</tr>
<tr>
<td>Effective implementation of internal control mechanism</td>
<td>16,850,000.00</td>
<td>16,850,000.00</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Monitor and evaluate governance and anti-corruption initiatives</td>
<td>146,000,000.00</td>
<td>20,000,000.00</td>
<td>126,000,000.00</td>
<td></td>
</tr>
<tr>
<td>To provide Human Resource Management &amp; Secretariat support</td>
<td>190,436,992.00</td>
<td>168,804,117.00</td>
<td>21,632,875.00</td>
<td></td>
</tr>
<tr>
<td>Financial Support Services</td>
<td>16,376,000.00</td>
<td>16,376,000.00</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td><strong>891,775,492.00</strong></td>
<td><strong>661,248,617.00</strong></td>
<td><strong>230,526,875.00</strong></td>
<td></td>
</tr>
</tbody>
</table>