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Learning from Success: The Implementation of Election Observation Recommendations in Sub-Saharan Africa

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London, September 2020

Acknowledgements and disclaimer

This paper 'Learning from Success: The Implementation of Election Observation Recommendations in Sub-Saharan Africa' is the product of Westminster Foundation for Democracy (WFD). It was made possible through funding received from the United Kingdom's Foreign and Commonwealth Office (FCO) and the Department for International Development (DFID).

This paper was written by Susan Dodsworth, Lecturer at the University of Queensland School of Political Science; Eloïse Bertrand, Early Career Fellow, University of Warwick and Jamie Hitchen, an independent researcher. The paper has been peer-reviewed by Tanja Hollstein, WFD Senior Elections Adviser, and was published in September 2020.

The views expressed in the paper are those of the authors, and not necessarily those of or endorsed by the institutions mentioned in the paper, nor of the UK Government, which does not accept responsibility for such views or information or any reliance placed on them.

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Key points

There is significant variation in the implementation of election observation recommendations across sub-Saharan Africa, with implementation varying both between countries and between different types of recommendations.

- Recommendations are far more likely to be implemented when the Electoral Management Body (EMB) is independent in practice and has the requisite capacity. This suggests there is much to be gained by building strong relationships with EMBs.
- Recommendations addressing certain topics, most notably campaign finance and the political representation of women, are much harder to implement than others because they represent more fundamental challenges to the political status quo.
- Despite challenging contexts, and difficult topics, we do sometimes see cases of surprising success. This tends to occur when civil society groups have built cohesive and coherent coalitions, increasing domestic pressure for change.
- In some areas, the recommendations of international observers have had benefits, despite their lack of implementation. For example, unimplemented recommendations have indirectly contributed to the expansion of domestic election observation by keeping this issue 'on the agenda'.

Introduction

International election observation is the most visible form of democracy assistance - and one that is particularly prominent in sub-Saharan Africa. In the lead up to an election the presence of observers gradually intensifies, peaking in the final week before a poll. At this point, 'delegations of foreign observers arrive daily, a stream that becomes a flood late in the week as hundreds or thousands of observers descend on the country'.¹ On election day, teams of observers spread out to different polling stations, monitoring both the voting process and the count. The media quickly seize on international observers' 'preliminary' statements about the quality of an election, typically casting these statements as a verdict on whether an election was 'free and fair' despite the efforts of observers to avoid such blanket statements.

A substantial part of observation work is focused on detecting and deterring electoral fraud in the immediate window around election day. Yet international election observation is not only about that time period. It is also about improving the integrity of elections over the long-term. To this end, the final reports of international election observers, which are normally released several months after election day, include a series of recommendations. These recommendations set out steps that can be taken by a wide variety of actors - including election commissions, political parties, civil society, legislatures and even international donors - to improve the quality of elections in a particular country. Recommendations vary widely. They might include suggestions to improve the training of polling staff, identify potential changes to electoral laws, or call for improved efforts to increase the political participation of women. These recommendations are important, since they constitute one of the primary mechanisms through which observers seek to strengthen the integrity of future elections.

1. Thomas Carothers, 'The Observers Observed', *Journal of Democracy* 8, no. 3 (1997): 17, <https://doi.org/10.1353/jod.1997.0037>.

Despite this, academic research on the work of both international and domestic election observers has tended to focus on the behaviour of observers – and their impact – in the period immediately before and after an election. Scholars have examined, for example, whether the presence of observers deters electoral fraud or merely displaces it.² A great deal of attention has been paid to the impact of observation on electoral violence, with studies linking the presence – and verdicts – of international observers to a heightened risk of violence both before and after election day.³

In contrast, relatively little attention has been paid to the longer-term impact of the work that international election observers do. One exception is Judith Kelley, who made the first systematic attempt to evaluate the long-term impact of international election observation, on the basis of 15 case studies including three countries in sub-Saharan Africa: Kenya, South Africa and Lesotho.⁴ Kelley found that the recommendations of international observers were rarely implemented immediately; similar recommendations were often made across several elections before change occurred. Moreover, when implementation did take place, change was often minimal and while international observers played a supportive role, they were rarely the primary drivers of change. That said, Kelley also concluded that international observers did sometimes have more long-term impact. Typically, this occurred when international observers were more forceful in their criticisms, politics was less violent and less ‘winner-takes-all’, and strong domestic pressures for reform existed.

More recently, efforts have been made to scrutinise the recommendations made by international observers using quantitative techniques. Working in partnership with the Organization of American States (OAS), Ferran Martinez i Coma, Alessandro Nai and Pippa Norris mapped out recommendations made by OAS observation missions between 1999 and 2015 in 25 countries in Latin America and the Caribbean.⁵ They found that the rates of implementation varied significantly between countries and types of recommendations. For example, their data showed that recommendations calling for increased resources were more likely to be implemented than those requiring formal legal changes, while the highest rates of implementation occurred in countries heavily dependent on foreign aid.

International election observers invest significant time and energy in making recommendations designed to improve the integrity and credibility of elections. Yet our collective knowledge in this area remains limited – especially in sub-Saharan Africa, the region where elections are most likely to be observed. We need a better understanding of what kinds of recommendations tend to be implemented, and of the causal mechanisms at play – and thus what could be done to make these recommendations more useful.

With that in mind, this paper examines the implementation of recommendations made by several leading international observers in five countries in sub-Saharan Africa: Ghana, Kenya, Liberia, Nigeria, and Uganda. Our analysis – based on a combination of quantitative and qualitative evidence – reveals both similarities and differences in the factors that shape the implementation of recommendations between these countries. First, we find that much of the variation between countries, in terms of the rate at which recommendations are implemented, can be explained by reference to the nature of each country’s Election Management Body (EMB). Where EMBs have succeeded in building their capacity and independence, we typically see a greater proportion of recommendations being implemented. Second, certain issues constitute ‘hard cases’

2. Nahomi Ichino and Matthias Schuendeln, ‘Deterring or Displacing Electoral Irregularities? Spillover Effects of Observers in a Randomized Field Experiment in Ghana’, *Journal of Politics* 74, no. 1 (2012): 292-307, <https://doi.org/10.1017/S0022381611001368>.

3. Ursula E Daxecker, ‘The Cost of Exposing Cheating: International Election Monitoring, Fraud, and Post-Election Violence in Africa’, *Journal of Peace Research* 49, no. 4 (2012): 503-16, <https://doi.org/10.1177/0022343312445649>; Ursula E. Daxecker, ‘All Quiet on Election Day? International Election Observation and Incentives for Pre-Election Violence in African Elections’, *Electoral Studies* 34 (June 2014): 232-43, <https://doi.org/10.1016/j.electstud.2013.11.006>; Inken von Borzyskowski, ‘The Risks of Election Observation: International Condemnation and Post-Election Violence’, *International Studies Quarterly* 63, no. 3 (2019): 654-67, <https://doi.org/10.1093/isq/sqz024>.

4. Judith Kelley, *Monitoring Democracy: When International Election Observation Works, and Why It Often Fails* (Princeton: Princeton University Press, 2012).

5. Ferran Martinez i Coma, Alessandro Nai, and Pippa Norris, ‘Democratic Diffusion: How Regional Organizations Strengthen Electoral Integrity’, Executive Report (Washington D.C.: Organization of American States, 2015), <https://www.electoralintegrityproject.com/democratic-diffusion>.

when it comes to implementation - in particular the areas of campaign finance and women's political participation. These areas are of great concern to international observers, but their recommendations on these issues have rarely gained traction. Finally, and on a more positive note, there is a way in which this problem might be overcome. Some recommendations have been implemented 'against the odds,' providing surprising cases of success. This has often been the result of well-organised and cohesive campaigns led by domestic civil society groups, suggesting one avenue through which international election observation and the broader democracy assistance community might be able to better support each other's work. Before discussing our findings in greater depth, we describe the research design which underpins them.

What we've done

To better understand the implementation of election observers' recommendations, we have employed a research design that combines quantitative and qualitative methods. First, we constructed a new database that tracks the implementation of recommendations made by international election observation missions in five countries in sub-Saharan Africa - Kenya, Nigeria, Uganda, Ghana, and Liberia - in the period from 2002 to 2018. We chose these countries for several reasons. On the one hand, they vary on several important fronts, including the level of democracy (and in particular, the degree of genuine electoral competition), as well as dependence on foreign aid - two factors that Kelley suggests influence the long term impact of observation.⁶ On the other hand, these countries are similar in that international observers have maintained a fairly consistent presence at their elections - something that allows us to track rates of implementation over time.

The database covers leading international and regional observers, including missions from the European Union, the Commonwealth, the Carter Center, the National Democratic Institute, the International Republican Institute, the African Union, and the Electoral Institute for Sustainable Democracy in Africa. As such it is the first of its kind: previous efforts at collecting similar data focused on a single observer - the OAS. Drawing on the reports of election observation missions endorsed by these international and regional organisations, desk-based research, and consultation with country experts, we employed a coding strategy closely modelled on the approach previously used by Ferran Martinez i Coma and his co-authors to map the nature and impact of observation recommendations made by the OAS.⁷

At present, our database identifies 1292 recommendations. It classifies each recommendation along a number of dimensions, including the stage or aspect of the election it targets, its timing within the electoral cycle, its scope and specificity, the actors it identifies, the nature of the mechanisms it relies upon, and the type of the change it recommends. In most cases (985 recommendations)⁸ the database also includes an assessment of whether these recommendations have been fully implemented, partially implemented or not implemented. These assessments were based on the subsequent reports of international election observers (which often noted where action had been taken on previous recommendations), reviews of relevant legislation (where legal changes were recommended), the websites of Electoral Management Bodies (EMBs), searches for relevant media reports, and consultations with country experts. We focused on assessing the extent of implementation at the time of the next election - allowing a full electoral cycle for changes to take place. This may mean our database underestimates the rate of implementation, since more ambitious reforms may take several electoral cycles. Over the long term, however, our dataset should still allow us to detect most cases where this occurs, since we can identify where similar recommendations have been repeated over time - and then finally implemented.

6. Kelley, *Monitoring Democracy*.

7. Martinez i Coma, Nai, and Norris, 'Democratic Diffusion: How Regional Organizations Strengthen Electoral Integrity'.

8. As yet, we have not coded the implementation of recommendations from the most recent elections held in each country as the lack of subsequent observation reports limited the amount of information available to assess implementation in those cases.

Given the categorical nature of the information in our dataset, we have relied on relatively simple techniques in our analysis, cross-tabulating key variables and using chi-square tests to check the statistical significance of relationships between them.⁹ We have then extended our analysis qualitatively, with case studies in three of the five countries covered by our database: Ghana, Nigeria and Uganda. Each case study combines desk-based research with a short period of fieldwork in the relevant country, during which interviews were conducted with local electoral officials, civil society activists, and politicians. We use these case studies to probe the mechanisms underpinning the patterns revealed by our quantitative analysis, and to probe what we term 'surprising successes', cases where the recommendations of election observers appear to have been implemented 'against the odds'. We elaborate on what was so 'surprising' about these cases when we discuss them in more detail, below.

We selected our three focus countries so as to capture variation on two key variables that may affect the implementation of observers' recommendations. The first of these is the quality of democracy. Given Kelley's observation that observers' recommendations are more likely to be implemented when politics is less 'winner-takes-all' and when strong domestic pressures for reform exist,¹⁰ we expect higher levels of democracy are likely to be conducive to the implementation of observers' recommendations. Thus, we would generally expect more recommendations to be implemented in Ghana, which is considered 'Free' by Freedom House and is one of Africa's most stable and competitive democracies. Nigeria represents a more difficult context. Categorised as 'Partly Free', Nigeria has been formally democratic since 1999, but is typically regarded as a 'hybrid regime' as the depth and quality of its democracy is somewhat questionable. Yet it is Uganda where - on the face of it - the political environment is likely to be least conducive to implementation. Currently categorised as 'Not Free' by Freedom House, Uganda is regarded by academics as an example of electoral authoritarianism; a political regime in which the authoritarianism operates behind the formal institutional façade of a representative democracy.

The second factor that has shaped our case selection is foreign aid, which may affect the adoption of observers' recommendations by providing both an incentive for countries to act on those recommendations (lest aid be withdrawn) and the financial means to implement reforms. Uganda has historically been cast as a 'donor darling' and of all our cases is the most reliant on foreign aid - down from around 15 per cent of GNI in the period from 2007, the country now receives aid equivalent to around 7 or 8 per cent of its GNI each year.¹¹ This has not, however, always given Uganda's donors as much political leverage as many expect.¹² In contrast, Nigeria - which enjoys substantial natural resource wealth in the form of oil - is far less reliant on foreign aid flows. It typically receives aid equivalent to less than one per cent of its GNI each year, something that may make it harder for international donors to incentivise or facilitate the implementation of observers' recommendations. Ghana follows a different trajectory. Though it received similar levels of aid (relative to GNI) as Uganda in the period from 2000 to 2004, economic growth has allowed it to substantially reduce its reliance on foreign aid. In 2018, Ghana received aid equivalent to less than two per cent of its GNI.

Of course, our cases also vary in other respects beyond the level of democracy and their reliance of foreign aid. As such, the level of control that we can maintain through case selection is unavoidably imperfect - a limitation mitigated by our use of qualitative analysis. The variation on these two key points does, however, allow us to probe some of the contextual factors that affect the implementation of election observers' recommendations.

9. Except where explicitly stated otherwise, for all results reported below, the p-value from a Pearson's chi-square test between the two relevant variables is less than 0.01.

10. Kelley, *Monitoring Democracy*.

11. Figures cited in this paragraph refer to net Official Development Assistance (ODA) as a percentage of Gross National Income (GNI). Aid flow data is from the OECE-DAC's Creditor Reporting System, with World Bank GNI estimates.

12. Jonathan Fisher, 'The Limits - and Limiters - of External Influence: Donors, the Ugandan Electoral Commission and the 2011 Elections', *Journal of Eastern African Studies* 7, no. 3 (2013): 471-91, <https://doi.org/10.1080/17531055.2013.809206>.

What we've found - patterns of implementation

On average, across our sample, just over 14 per cent of the recommendations made by international election observers were fully implemented by the time of the next election. A further 20.5 per cent of recommendations were partially implemented. This rate of success is perhaps somewhat disappointing, since it means that roughly two-thirds of recommendations were not implemented at all. Yet, as noted above, this may reflect the fact that more ambitious or complicated recommendations take several electoral cycles to implement. Moreover, these aggregate figures mask some important variations, variations that suggest that recommendations made by international elections observers can have an impact - in the right circumstances.

Our data reveals substantial variation between countries in terms of how frequently the recommendations of international election observers are implemented. Kenya is the clear leader here, with just over half of all recommendations implemented either fully (19.8 per cent) or partially (31.3 per cent). In contrast, rates of implementation are far lower in Uganda, where only 5 per cent of recommendations have been fully implemented, and 17 per cent partially implemented.

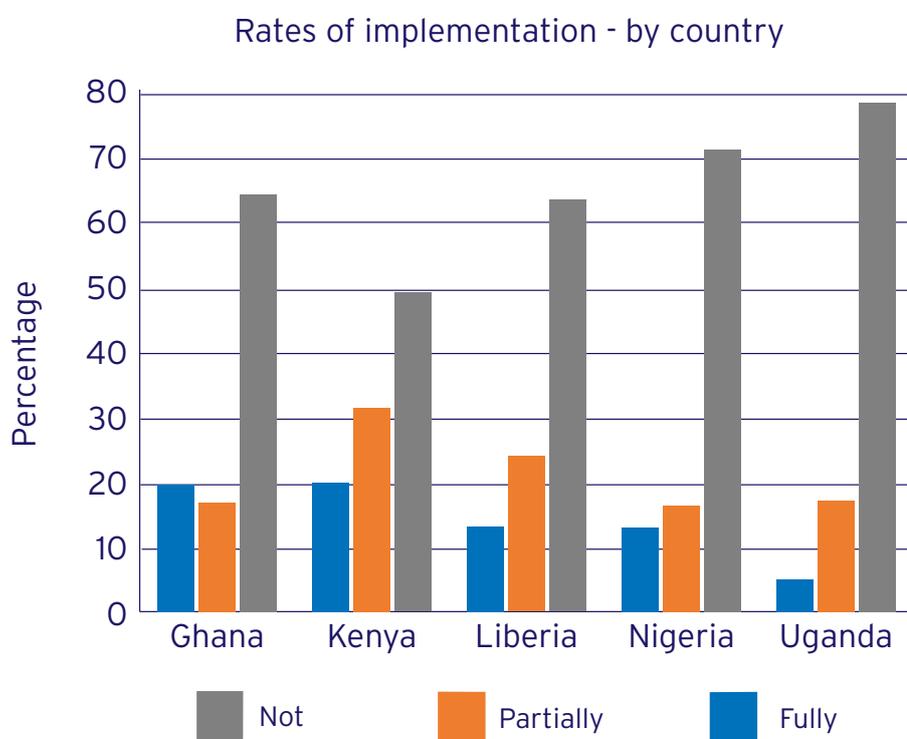


Figure 1 shows rates of implementation of election observation recommendations by country.

The relationship between specific elections and rates of implementation is also statistically significant, and in some cases, there is also sizeable variation between elections. This is most pronounced in Kenya, as illustrated in Figure 2. Rates of implementation were far higher for recommendations made in the wake of Kenya's 2007 election, which triggered a wave of post-electoral violence that killed more than 1200 people and displaced several hundred thousand.

Rates of implementation - by election



Figure 2 shows rates of implementation of election observation recommendations by election for three Kenyan elections: 2002, 2007 and 2013.

That violence - which shocked both the international community and Kenyans themselves - may go some way to explaining why rates of implementation were higher following the 2007 election. The violence generated both domestic and international pressure to improve the integrity of the Kenyan electoral process, and (as illustrated in Figure 3) appears to have triggered a substantial increase in the provision of aid funds for this purpose in the lead up to both the 2013 and 2017 elections. Thus, in the wake of the 2007 elections, Kenya enjoyed both the financial resources and political will necessary to put electoral reforms into place.

Official development assistance for elections - Kenya

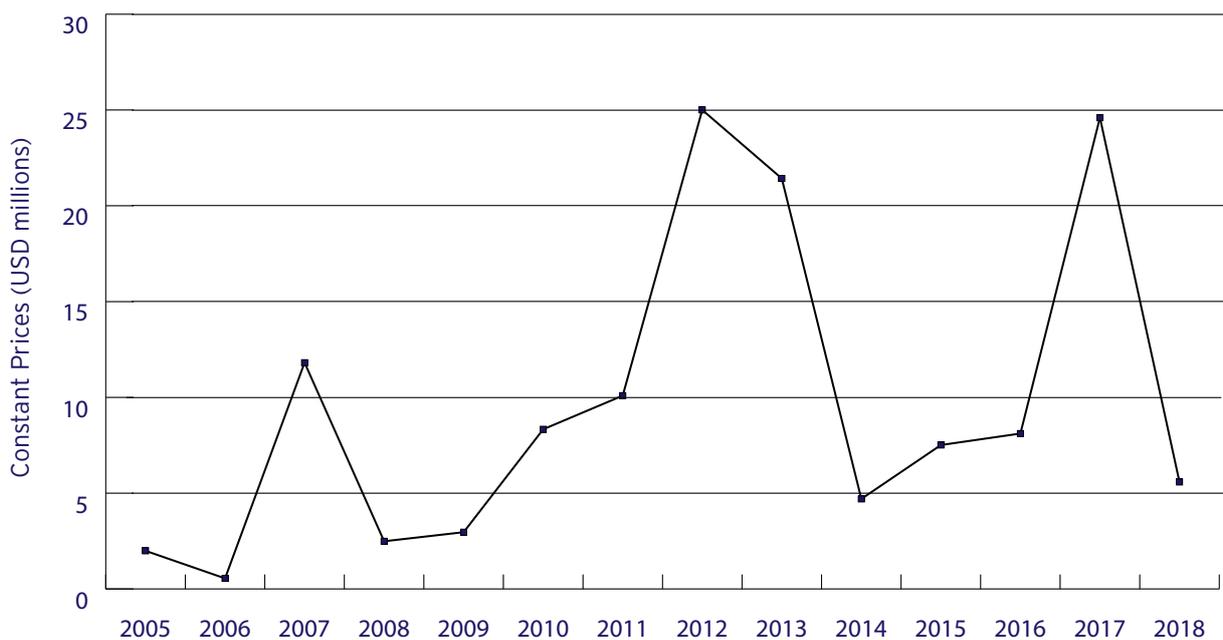


Figure 3 shows ODA disbursements from all Official Donors. Data from the OECD-DAC Creditor Reporting System.

Some types of recommendations are implemented far more often than others. Here two factors seem to be particularly important: the actors to whom a recommendation is directed, and the subject matter of the recommendation. Almost 17.5 per cent of recommendations directed towards electoral commissions are fully implemented, while around 26 per cent are partially implemented. In contrast, recommendations directed to other actors (or which fail to specify an actor) are fully or partially implemented less frequently (13 per cent and 17.5 per cent respectively).

The relatively good track record of electoral commissions in the implementation of recommendations is not entirely surprising. International election observers - and the organisations that endorse their missions - typically invest a significant amount of time in building working relationships with electoral commissions. Election commissions are often popular targets for support - including financial assistance and capacity building - from the international democracy assistance community. This popularity stems both from the fact that elections are a critical part of democracy, and the fact that electoral commissions tend to be more technocratic and less overtly political bodies - allowing international donors to support them without triggering allegations that they are 'taking sides' in domestic politics.

When it comes to subject matter, it appears that certain areas are far more amenable to the suggestions of international election observers than others. As Figure 4 shows, rates of implementation are relatively good, for example, for recommendations linked to voter registration: almost half (46.5 per cent) of these recommendations are at least partially implemented. Electoral procedures also appear to be an area where international observers tend to have more success, with almost 20 per cent of recommendations fully implemented and a further 20 per cent partially implemented.

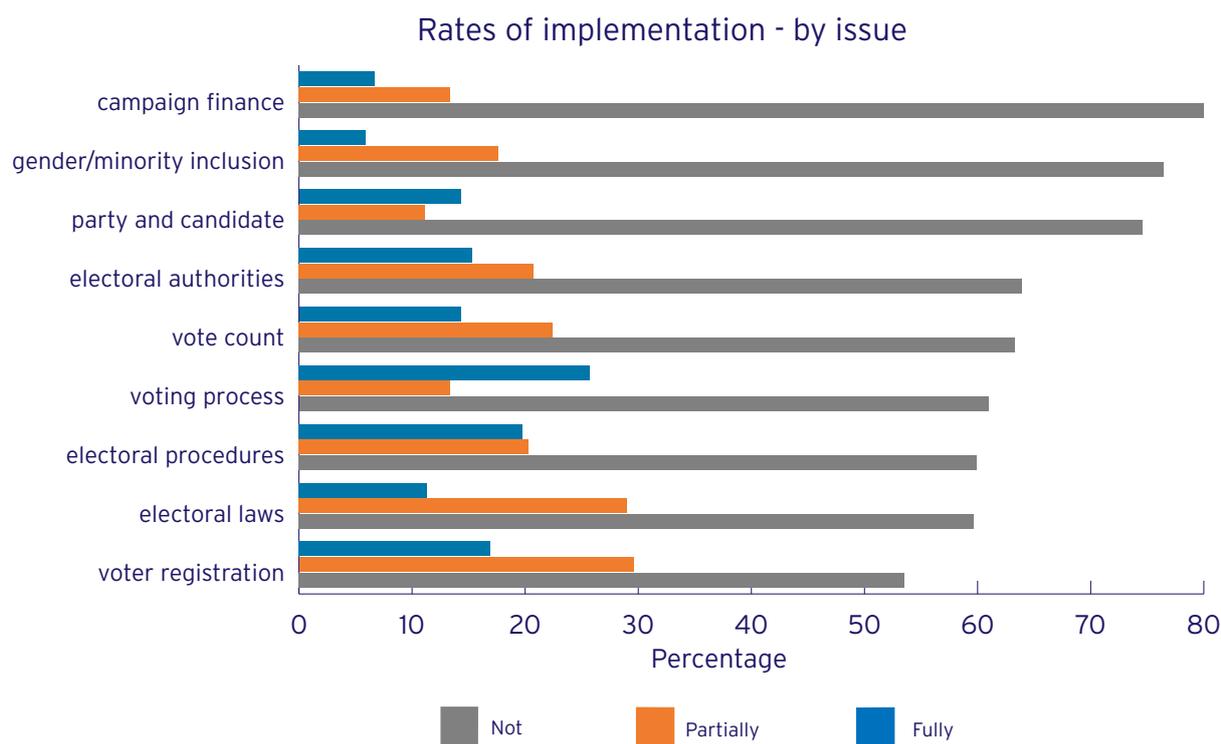


Figure 4 shows rates of implementation by issue, for selected issues. Additional issues are included in our dataset, but omitted here for the sake of brevity.

One possible reason for relative success in these areas may be that these kinds of recommendations are typically more technical. This both allows international donors to support their implementation without appearing to intervene in a country's domestic politics while making them attractive to donors, since technical solutions often appear to offer (though do not always deliver) relatively 'easy wins'. Certainly, voter registration is an area where international funds are very frequently forthcoming. At various points, donors

have helped to facilitate the roll-out of new voter registers in countries such as Kenya and Uganda. In more recent years, this has often involved the roll out of new biometric technologies. Unfortunately, as others have observed, such costly, tech-driven projects have only rarely delivered the benefits donors anticipated.¹³

In contrast, rates of implementation are much lower for recommendations that address campaign finance or the political inclusion of women and other minorities. Across our sample, less than 7 per cent of recommendations relating to campaign finance were fully implemented, with around 13 per cent being partially implemented. This should be of significant concern to international election observers, and the broader democracy assistance community, given evidence of both the rising 'cost of politics' across many parts of sub-Saharan Africa and its deleterious effects on the political landscape.¹⁴ Given the emphasis that is also placed on efforts to increase the political participation of women and minorities, the fact that just 6 per cent of recommendations addressing this issue are fully implemented (and 17.5 per cent partially implemented) is also disappointing.

How can we explain these varying patterns of implementation? While we have already pointed to some potential explanations, quantitative methods provide limited insight into this question. We therefore turn to our case studies, which we use to explain why certain types of recommendations struggle to get traction - and to scrutinise some relatively surprising cases of success.

Explaining hard cases - and cases of surprising success

To better understand how and why certain recommendations made by international election observers have been implemented - while others have not - we examine three countries in more detail: Ghana, Nigeria and Uganda. In each of these cases we look at both failures and successes, that is, we investigate why certain reforms have not been adopted, despite observers making repeated recommendations along similar lines, and why some recommendations that appear to address sensitive or contentious topics have in fact been implemented.

Ghana

In Ghana, international election observers have seen a significant proportion of their recommendations fully or partially implemented. Of the recommendations that we coded in Ghana, just over one-third fell into these categories. This 'success rate' puts Ghana ahead of Nigeria and Uganda, but behind Kenya, a fact that is not entirely surprising. As noted above, Ghana has long been seen as one of Africa's most stable and competitive democracies, with regular alternations in power between its two major parties - the National Democratic Congress (NDC) and the New Patriotic Party (NPP) - occurring since the country's return to multiparty democracy in 1992. While electoral violence does sometimes occur in Ghana, it is relatively rare, meaning that Ghana's elections are typically more peaceful than those of Kenya or Uganda.¹⁵ In such a political context, where politics is less violent, and the prospect of a return to power from opposition makes elections less 'winner-takes-all', we would expect to see reasonably good rates of take-up of the recommendations made by international observers in their reports.

13. Nic Cheeseman, Gabrielle Lynch, and Justin Willis, 'Digital Dilemmas: The Unintended Consequences of Election Technology', *Democratization* 25, no. 8 (2018): 1397-1418, <https://doi.org/10.1080/13510347.2018.1470165>.

14. Westminster Foundation for Democracy, 'Cost of Politics in Ghana' (London: Westminster Foundation for Democracy, 2017); Frederick Golooba-Mutebi, 'Cost of Politics in Uganda' (London: Westminster Foundation for Democracy, 2017); Adebawale Olorunmola, 'Cost of Politics in Nigeria' (London: Westminster Foundation for Democracy, 2017).

15. Scott Straus and Charlie Taylor, 'Democratization and Electoral Violence in Sub-Saharan Africa, 1990-2008', in *Voting in Fear: Electoral Violence in Sub-Saharan Africa*, ed. Dorina Akosua Oduraa Bekoe (Washington, D.C.: United States Institute of Peace, 2012), 15-38.

There is, however, a significant amount of variation in terms of which recommendations have been implemented in Ghana and which have not. In Ghana, international election observers have directed roughly 43 per cent of their recommendations towards the Electoral Commission (EC), and the EC has fully or partially implemented more than 53 per cent of those recommendations. Thus, the EC accounts for almost three-quarters of fully implemented recommendations in Ghana, and almost half of the recommendations that have been partially implemented.

This pattern clearly suggests that the relatively high rate of implementation of recommendations in Ghana has a lot to do with the nature of Ghana's EC - in particular, its independence. However, as we discuss in more detail below, other factors have also contributed to this, including strong and sustained civil society mobilisation around the issue of electoral reform (facilitated in part by donor funding) and a significant degree of local ownership of the reform process.

The case of Ghana is not, however, entirely a positive one. In other areas, such as political finance and the representation of women, repeated recommendations made by observers have had little impact. This is due to two factors explored in greater depth below. First, reforms in these areas would represent a much more fundamental change to the political status quo. Second, civil society has also been less active in these two areas, while the broad coalitions that are required to drive forward more ambitious reforms have generally been absent.

The critical role of the Electoral Commission - and its independence

Prior research has identified the EC as being a key contributor to democratisation in Ghana.¹⁶ The pattern of implementation noted above suggests that much of its reputation is well deserved: Ghana's EC has implemented more than half of the recommendations directed towards it to at least some extent. This begs the question: why has Ghana's EC been more successful at implementing the recommendations made by international observers than election management bodies in other countries? One important factor appears to be the high degree of independence of the EC. This is established de jure in Ghana's constitution, which provides (in Article 46) as follows:

'Except as provided in this Constitution or in any other law not inconsistent with this Constitution, in the performance of its functions, the Electoral Commission, shall not be subject to the direction or control of any person or authority.'

While the Constitution gives the President the power to appoint members of the EC, it also provides the Chairman and the two Deputy Chairmen with security of tenure: their terms are unlimited until they reach retirement age (70 for the Chairman, and 65 for the Deputy Chairmen).¹⁷

More significant than this formal independence, however, is the fact that Ghana's EC also enjoys a substantial degree of de facto independence.¹⁸ This is not to say that it is entirely immune to political influence from the government: Ghanaian experts have observed that the EC lacks financial independence, with shortfalls and delays in government funding often forcing it to rely on international donors. Yet, the EC's historical track record also demonstrates a deliberate effort to insulate itself from political influence, and a willingness to resist interference by the Executive.¹⁹

16. Emmanuel Debrah, 'Measuring Governance Institutions' Success in Ghana: The Case of the Electoral Commission, 1993-2008', *African Studies* 70, no. 1 (2011): 25-45, <https://doi.org/10.1080/00020184.2011.557573>.

17. The position of the remaining four members of the EC is more ambiguous. The Constitution and other laws are silent regarding their tenure, but in practice they are expected to serve until retirement: see the entry for Ghana in International IDEA's *Electoral Management Design Database*, available here: <https://www.idea.int/data-tools/country-view/111/54>.

18. Academic research shows that EMBs with de facto independence have a strong and positive effect on electoral integrity. In contrast, the de jure independence of EMBs has little direct effect on electoral integrity; it influences electoral integrity primarily by shaping the extent of an EMBs' independence in practice. See Carolien van Ham and Holly Ann Garnett, 'Building Impartial Electoral Management? Institutional Design, Independence and Electoral Integrity', *International Political Science Review* 40, no. 3 (2019): 313-34, <https://doi.org/10.1177/0192512119834573>.

19. Emmanuel Debrah, 'Measuring Governance Institutions' Success in Ghana'; Emmanuel Gyimah-Boadi, 'Modelling Success:

Here, it has been helped by the fact that political power has changed hands repeatedly and regularly in Ghana. Regular alternations between the NDC and NPP mean that the leaders of both parties have come to appreciate the value of a relatively independent and effective EC. Both parties anticipate - indeed expect - that they will eventually lose power (when in government) and that they will eventually have the opportunity to regain it (when in opposition). As such, the political barriers that have precluded efforts to strengthen the independence and efficacy of election management bodies in other countries (such as Uganda) are largely absent in Ghana. This does not mean, however, that the continuing ability of Ghana's EC to drive the implementation of observation recommendations can be taken for granted. In the period from 2012 to 2016, there appears to have been significant internal divisions within the leadership of the EC, culminating in allegations of malfeasance and corruption. According to some Ghanaian researchers, these internal conflicts undermined the EC's implementation of electoral reforms in that period.²⁰

The contribution of civil society and local ownership of reforms

Experts on Ghana's elections also point to strong and sustained civil society mobilisation around the issue of electoral reform as a factor that has contributed to the implementation of certain recommendations. Much of this mobilisation has been made possible by international donors, who (in the words of leading experts) 'have almost nearly exclusively bankrolled the numerous projects that Ghana's domestic civil society and media have initiated to promote election transparency and credibility since the mid-1990s'.²¹ It is also significant that civil society has been able to build a productive working relationship with the EC. These factors, combined with the relative independence of the EC, have helped to ensure a relatively high degree of local ownership over - and pressure for - the implementation of electoral reforms, including reforms aligned with the recommendations of international observers. As a result, recommendations made by international observers have been less vulnerable to criticisms that they amount to illegitimate Western interference, as has sometimes been the case in countries such as Uganda.

Generally, the recommendations that have been implemented by the EC have tended to be those that have been adopted by, or aligned with, the priorities of these domestic actors (civil society and the EC). Where the preferences of international observers and local actors have diverged, recommendations have tended not to be implemented. For example, while some international observers have indicated concern about the disproportionate sanctions (up to two years' imprisonment) that can be imposed with respect to most electoral offences,²² Ghanaian observers have typically emphasised the importance of ensuring that those who commit electoral offences are punished.²³ Thus, there has been little domestic pressure to reduce the maximum penalties applicable to electoral offences, which consequently remain unchanged.

Notable failures: political financing and the representation of women

Overall, Ghana has a reasonably good track record of implementing the recommendations made by international election observers. Yet there has been far less success with respect to recommendations whose implementation would require significant legal reform or trigger substantial changes to the political status quo. The two areas where this is most obvious relate to the regulation of political finance and efforts to

Governance and Institution-Building In Africa: The Case of Ghana's Electoral Commission' (Accra: CDD-Ghana, 2008), https://www.codesria.org/IMG/pdf/CDD_CDP_Electoral_Commission_Modelling_Success_-_Research_Report_Boadi_Gymah.pdf.

20. Ransford Edward Van Gyampo, 'The State of Electoral Reforms in Ghana', *Africa Spectrum* 52, no. 3 (2017): 95-109, <https://doi.org/10.1177/000203971705200305>.

21. E. Gyimah-Boadi and Theo Yakah, 'Ghana: The Limits of External Democracy Assistance', WIDER Working Paper (Helsinki: United Nations University World Institute for Development Economics Research (UNU-WIDER), October 31, 2013), 22, <https://doi.org/10.1093/acprof:oso/9780199686285.003.0010>.

22. Following the 2008 election, the EU observation mission concluded that a prison sentence of up to two years (the maximum penalty for many electoral offences) is not proportional for most electoral offences and therefore should be reduced to more appropriate penalties.

23. For example, the Electoral Reform Monitoring Advocacy Group has stressed that 'Election officers who breach electoral laws must feel the brunt of the necessary penalties'; Electoral Reform Monitoring Advocacy Group, 'Electoral Reform Monitoring Advocacy Group - Bulletin 2' (Accra: CODEO Ghana, November 2016), <http://www.codeoghana.org/assets/downloadables/Electoral%20Reform%20Monitoring%20Advocay%20Group-%20Bulletin%20-%202016.pdf>.

increase the representation of women in politics. This is a pattern we see not only in Ghana, but (as discussed above) across the five countries in our dataset more generally. In Ghana, both of these issues - political finance and the representation of women - have been the repeated target of recommendations made by international election observers. However, the vast majority of these remain unimplemented or have been implemented in relatively tokenistic ways.

One example of this relates both to the representation of women, and the (astronomical) cost of Ghana's election campaigns - something that has been documented by WFD.²⁴ Prior to the 2016 election, both major parties - the NDC and NPP - announced that they would discount the nomination fees they imposed on female aspirants seeking to contest the primary elections by 50 per cent. Yet this did little to address the structural inequalities that deter women from running for office in Ghana, and did even less to reduce the financial burden of contesting. Women with experience in contesting the party primaries typically described the reduction in nomination fees as 'a drop in the bucket' compared to the overall cost of running for office.²⁵ As a result, the discounted nomination fees did little to increase the number of women candidates in the 2016 election.

When it comes to the inclusion of women in politics, there are a variety of reasons why the implementation of recommendations has been particularly poor. Recent research examining the stalled progress in women's representation in the Parliament of Ghana has highlighted the failure of women's groups to mount a strong and concerted campaign to lobby for the adoption of the Affirmative Action Bill, which was first proposed over a decade ago.²⁶ Notably, the need for such a campaign is something that leading women activists have now identified, and which directly contributed to the formation of a new coalition which is lobbying for the Affirmative Action Bill to be passed prior to the 2020 election.²⁷ The limited amount of time remaining prior to that election, combined with disruption caused by COVID-19, means that this coalition faces an uphill battle. Despite this, the emergence of a more coordinated and cohesive campaign to promote gender equality in Ghanaian politics is a positive development.

The absence of an effective coalition working to increase the political representation of women is sometimes attributed, in part, to a history of distrust between women's organisations and women MPs in Ghana. This distrust is a legacy of previous authoritarian governments, including that of Jerry John Rawlings, which used a state-backed organisation, the 31st December Women's Movement to co-opt many Ghanaian women, weakening more autonomous women's organisations.²⁸ Interviews that we conducted with women MPs in late 2019 suggest much of this distrust remains: most women MPs describe their relationship with civil society in sceptical, if not explicitly negative, terms. Those interviews also point to another factor that has impeded efforts to increase the representation of women in Ghana's Parliament: a dearth of male allies. While previous research has often highlighted the importance of male allies to the success of gender-equality initiatives,²⁹ women MPs in Ghana typically report in interviews that they have no male allies within the Parliament, or that those who claim to support them are 'just paying lip service' to the idea of gender equality. This creates a significant barrier to the implementation of recommendations designed to increase the political participation of women.

24. Westminster Foundation for Democracy, 'Cost of Politics in Ghana'.

25. Gretchen Bauer and Akosua K. Darkwah, "'Some Money Has to Be Going...'" Discounted Filing Fees to Bring More Women into Parliament in Ghana', in *Gendered Electoral Financing: Money, Power and Representation in Comparative Perspective*, ed. Ragnhild L. Muriaas, Vibeke Wang, and Rainbow Murray, Gender and Comparative Politics (New York, NY: Routledge, 2019), 133-54.

26. Gretchen Bauer, 'Ghana: Stalled Patterns of Women's Political Representation', in *The Palgrave Handbook of Women's Political Rights*, ed. Susan Franceschet, Mona Lena Krook, and Netina Tan, Gender and Politics (London: Palgrave Macmillan, 2019), 607-25.

27. Interview with one of the leaders of that coalition, by Susan Dodsworth, 14 October 2019, Accra.

28. Kathleen Fallon, *Democracy and the Rise of Women's Movements in Sub-Saharan Africa* (Baltimore: Johns Hopkins University Press, 2008), <https://doi.org/10.1353/book.3413>.

29. Sylvia Tamale, *When Hens Begin To Crow: Gender And Parliamentary Politics In Uganda* (Boulder, Colo.: Perseus, 2000).

Nigeria

Nigeria, home to around 200 million people, is Africa's most populous country. This, combined with the fact that Nigeria's democracy is less firmly entrenched than might be hoped, makes it a high priority for many international election observers. Since returning to multipartyism in 1999, Nigeria's democratic trajectory has been far less assured, and the quality of its elections far more contentious, than in Ghana. Despite that, the surprise victory of the opposition in 2015, followed by a smooth transfer of power, makes it clear that Nigeria's elections are both genuinely competitive, and meaningful.

In the period covered by our dataset, major international observers made 425 recommendations about how to improve Nigerian elections – more than any other country in our dataset. Yet the long-term impact of international observers on the quality of Nigeria's elections has probably not met observers' hopes: their recommendations have been implemented at a rate slightly below the average (for our sample), with only 13 per cent being fully implemented, and a further 16 per cent partially implemented. One reason for this, as we discuss in more detail below, is that Nigeria's EMB, the Independent National Election Commission (INEC), has struggled to build its capacity and assert autonomy in a manner equivalent to Ghana's EC. Though INEC's capacity and autonomy have clearly improved over time, it has found it difficult to push forward transformative reforms to the electoral process in the face of resistance from political elites with a vested interest in maintaining the status quo. In contrast, it has some success in advancing more modest technical and procedural reforms that are less threatening to the status quo. INEC's successes help to explain why Nigeria's elections are both competitive and meaningful, but its limits help to explain why Nigeria sits behind Ghana in terms of overall rates of implementation.

However, our qualitative analysis points to some important similarities between these two cases in terms of the kinds of recommendations that are – and are not – implemented successfully. As in Ghana, recommendations relating to the reform of campaign finance and the political inclusion of women and minorities have only rarely been implemented in Nigeria. Where they have been implemented, it tends to be the product of a concerted campaign led by domestic civil society groups. Another area where recommendations appear to have gained some traction relates to the role of citizen monitors. Yet here progress is largely due to the fact that domestic observation generates benefits for a variety of actors rather than a direct consequence of the recommendations made by international observers. Despite that, the improved operating space for domestic observation groups in Nigeria is a positive development, and one that could generate significant returns over the longer term.

The struggle to strengthen INEC

The legislative framework governing Nigerian elections underwent its last major reform in 2010, with the passage of both the Electoral (Amendment) Act 2010 and a number of amendments to Nigeria's Federal Constitution.³⁰ These reforms were the culmination of a process that built on recognition from President Umaru Musa Yar'Adua, the victor of 2007's dubious election, that an overhaul of the election process was required. Among other reforms, amendments made in 2010 included measures designed to improve INEC's political independence and financial autonomy. Members of political parties were precluded from being members of INEC, its recurrent expenditure was to be sourced from the first line of the consolidated fund (rather than being dependent on the Executive), and it was empowered to make its own rules and regulate its own procedures.³¹

These reforms delivered dividends. Ahead of the 2011 election, INEC was able to clean up the voter register, despite the significant costs involved in doing so, partly because of its increased capacity and independence, but also because it has the support of those in power, including President Goodluck Jonathan (who as Vice President, had succeeded President Yar'Adua after his death in 2010). In this period, INEC also benefited

30. This constitution was amended via the Constitution of the Federal Republic of Nigeria (First Alteration) Act, 2010.

31. Hakeem Onapajo, 'Nigeria's 2015 General Elections: The Saliency of Electoral Reforms', *The Round Table* 104, no. 5 (2015): 573-84, <https://doi.org/10.1080/00358533.2015.1090795>.

from having a well-respected and credible chair in Professor Attahiru Jega. Together, these factors led to noticeable improvements with respect to the 2011 elections, and more modest gains in 2015.³² In the wake of the 2011 elections, for example, surveys indicated that Nigerians held INEC in 'generally high regard', with a substantial majority reporting that INEC was well-prepared and impartial.³³

Since 2015, however, INEC has struggled to further strengthen its capacity and to push forward more ambitious reforms to the electoral process. Efforts at more transformative reform have typically encountered substantial resistance from the political elite, who have a vested interest in maintaining the status quo. President Buhari's refusal to sign new electoral reforms into law before the 2019 election offers a clear example of how political calculations continue to constrain INEC - and its ability to implement the recommendations proposed by election observers. The proposed bill, which was partly based on recommendations put forward by INEC, would have introduced a number of changes: toughening penalties for electoral officials who engaged in misconduct, increasing transparency and accountability in the voter registration process, and introducing measures designed to make political party primaries fairer and more inclusive. The bill passed through both the House of Representatives and the Senate four times in 2018, but each time the President refused to sign it, giving different reasons in each instance. In December 2018, when President Buhari refused to sign the bill for the fourth and final time, he claimed that it was too close to the elections - scheduled for February 2019 - to adopt changes to the Electoral Law.³⁴

In reality, political calculations were at play. Both the leaders of the House of Representatives and Senate had emerged contrary to Buhari's wishes, and by mid-2018 both were aligned to the opposition People's Democratic Party (PDP). This fomented animosity and mistrust between the Legislature and Executive, creating an environment in which reforms on sensitive issues like elections were very unlikely to make progress. The Executive was suspicious of the National Assembly's motives, and viewed the electoral reform agenda as one that was going to offer an advantage to the opposition. According to those we interviewed, the Executive was particularly concerned that the electronic transmission of results - something provided for in the proposed legislation - would make it more difficult for them to manipulate the counting and collation process.

Where reforms have been more modest, and not required formal legal change, INEC has generally been better placed to implement the recommendations of election observers. This has not, however, always guaranteed the implementation of such recommendations. For example, a consistent recommendation made in observers' reports is for INEC to publish a breakdown of election results by polling unit in an online depository. There are differing views on why this has not been actioned. One is that INEC simply lacks the technical capacity to analyse and securely maintain the data online. Another is that whilst INEC has the technical capacity to manage and present the data it uses to decide elections, including in a disaggregated way, it does not have sufficient political autonomy to publish such data without the approval of Executive. While INEC is formally non-partisan, both its Chair and National Commissioners are appointed by the President, as are the state-level election commissioners. This fuels speculation among our interviewees that many senior election officials, particularly those at the state level, owe their loyalty primarily to the person who appoints them - the President.

In some cases, INEC's ability to implement recommendations made by observers have been limited by the operational context in which it works. The sheer size of its population, combined with poor infrastructure and significant insecurity in some parts of the country, means that elections in Nigeria are as much a logistical exercise as political one. These challenges are magnified by the fact that INEC does not have direct control over

32. Ladi Hamalai, *Nigeria's 2015 General Elections: Continuity and Change in Electoral Democracy*. (Cham: Palgrave Macmillan US, 2017), <https://doi.org/10.1007/978-3-319-54096-2>.

33. Carl Levan and Abiodun Ajijola, 'Drivers and Dynamics of Electoral Reform, 1999-2015', in *The Oxford Handbook of Nigerian Politics*, ed. Carl Levan and Patrick Ukata (Oxford: Oxford University Press, 2018), 335-50, <https://doi.org/10.1093/oxfordhb/9780198804307.013.16>.

34. Jude Egbas, 'This Is Why President Buhari Refused to Sign Electoral Amendment Bill for the 4th Time in 2 Years', Pulse Nigeria, December 10, 2018, <https://www.pulse.ng/news/local/this-is-why-president-buhari-refused-to-sign-electoral-amendment-bill-for-the-4th/vrc24jm>.

key logistical elements of the process - it must rely on other agencies to help move materials to polling units, leaving that process open to abuse. Relatively straightforward recommendations, such as a recommendation to allow for poll workers and security agents to vote in advance of election day, have not been implemented, partly because of these logistical hurdles. That recommendation, for example, would require INEC to provide advance voting for more than one million people and keep their ballots secure until election day.

Tough topics: political finance and the inclusion of women

As in Ghana, two areas have proved particularly resistant to change, despite repeated recommendations for action in Nigeria: political finance and the inclusion of women. The need for better regulation of political finance, and more stringent enforcement of existing rules, has been the subject of recommendations made by successive observation missions. In 2011, for example, the Commonwealth observation mission recommended that 'INEC's capacity to monitor and enforce the legal provisions on campaign financing and political party expenditure should be enhanced, so as to ensure full compliance with the regulations'.³⁵ In 2015, its counterpart reiterated this sentiment, calling on INEC 'to enforce its regulations on campaign financing' so as to 'create a more level playing field'.³⁶

Yet, as in Ghana, reform in this area has proved difficult because it requires the buy-in of political parties, who benefit from the current system. In the words of one interviewee, 'Aspirants fund political parties in Nigeria, not the other way round'.³⁷ Formally, parties benefit from the very high nomination fees that aspirants must pay to contest party primaries, while informally party 'big men' benefit from the 'gifts' given by aspiring candidates, which often include substantial payments of cash.³⁸ According to interviewees, other powerful groups within the 'election economy' also have an interest in maintaining the current system. This includes lawyers and judges, whose services are sought, and sometimes bought, for post-election litigation, and who will lose out if campaign spending is more tightly monitored.

Nigeria has fared even worse than Ghana in terms of improving the political inclusion of women, who remain extremely poorly represented in Nigeria's political space. In fact, Nigeria has one of the poorest rates of representation of women in the world.³⁹ In the period from 2005 to 2015, women held - on average - just 6.6 per cent of the seats in Nigeria's House of Representatives. Unsurprisingly, this has drawn significant attention from international election observers, who have repeatedly recommended that concrete steps be taken to increase the participation and representation of women in political parties, the legislature, and electoral administration (that is, within INEC itself). Many of these recommendations have referenced Nigeria's National Gender Policy, which calls for women to make up at least 35 per cent of positions at all levels of political life. Unfortunately, there are few signs of progress. Indeed, the number of female legislators declined from 2015 to 2019, now sitting at a paltry 3.4 per cent.

Prior research has often pointed to the cohesiveness of the broader women's movement as a key indicator of success in the political advancement of women.⁴⁰ Our interviews suggest that this may go some way to explaining Nigeria's lack of progress in this area. Interviewees suggested that women's groups and networks have struggled to achieve harmony as different groups have maintained different objectives, making them easier to appease or ignore. Furthermore, women in positions of authority in political parties or elected to the legislature have struggled, or been unwilling, to build alliances with those who can reform the system from within. Of course, it is important not to simply blame women themselves for their lack of political

35. Commonwealth Observer Group, 'Nigeria National Assembly and Presidential Elections', Final Report (London: The Commonwealth, 2011), 21.

36. Commonwealth Observer Group, 'Nigeria Presidential and National Assembly Elections', Final Report (London: The Commonwealth, 2015), 26, <https://thecommonwealth.org/sites/default/files/inline/Nigeria%2BCOG%2BReport%2BMarch%2B2015.pdf>.

37. Interviews with independent election consultant, by Jamie Hitchen, 5 November 2019, Abuja.

38. For an inside account of the costs of Nigerian primary elections, see Ayisha Osori, *Love Does Not Win Elections* (Lagos: Narrative Landscape Press, 2017).

39. Figures in this paragraph are from the Inter-Parliamentary Union's database on women in parliament, available here: <https://data.ipu.org/women-ranking?month=6&year=2020>.

40. Aili Mari Tripp et al., *African Women's Movements: Transforming Political Landscapes* (Cambridge: Cambridge University Press, 2008).

representation - in Nigeria women in politics face a wide range of barriers, including the financial burden of running for office, a very real risk of becoming a target for violence and harassment, and deeply entrenched social norms that cast politics as an inappropriate pursuit for women. This not only makes it hard for women to enter politics, it also imposes a significant burden on those women who seek to make space for others. That said, the absence of strong domestic pressure to implement the recommendations of observers is one factor that has hindered progress in terms of the political inclusion of women. This has not been true, however, of all recommendations relating to inclusion.

A surprising success? Not Too Young To Run

In addition to women, youth are also underrepresented in Nigeria's political system. This has been the target of several recommendations from international observers. In 2011, for example, NDI's observation mission recommended that political parties 'promote meaningful and peaceful political participation of youth in elections'.⁴¹ In 2015, the Commonwealth's observer mission expressly recommended that the age limit for candidates to stand in elections to the National Assembly be reduced 'to recognise the contribution of youth to society, to encourage and broaden their participation'.⁴² At the time, candidates for the House of Representatives (the lower house) had to be at least 30 (and Presidential candidates at least 40). Given the size of the 'youth bulge' in Nigeria - more than half of its population is under 30 - this excluded a substantial portion of its citizens from running for office. Somewhat remarkably, given poor progress in terms of the political inclusion of women, this recommendation was implemented in 2018, when a constitutional amendment was signed into law. That amendment reduced age limits for candidates for the Presidency and House of Representatives by five years, a change that opened up the space for greater youth representation in politics - at least in theory.

The successful reduction of age limits was in large part due to the Not Too Young To Run movement, which was launched in 2016 by YIAGA Africa, a youth-based civil society organisation that seeks to promote good governance and youth political participation. Under YIAGA's leadership, the campaign grew quickly under the banner of the hashtag with which it became synonymous, #NotTooYoungToRun, eventually encompassing more than 100 youth organisations.⁴³ The movement's campaign was well-organised and cohesive, clearly and consistently targeting the age limits imposed by various sections of the constitution. According to those we interviewed, this movement was successful because it spoke with a strong collective voice and had a clear message. It was able to bring together different youth groups from across the country, using online and offline structures, to put consistent pressure on authorities.

Though the campaign was led by Nigerian youth, it was also well supported by donors who provided not only financial support but strategic advice that helped to sustain the movement's momentum. In addition, the Not Too Young to Run campaign struck at an opportune time, when their interests, and that of the incumbent government, aligned. President Buhari's administration was keen to improve its image among youth, cognisant of the fact that people between the ages to 18 and 35 made up just over half of Nigeria's registered voters in 2019.⁴⁴ As such, the changes advocated by Not Too Young To Run gave Buhari, and his government, tangible evidence of a commitment to Nigerian youth that had real value in an election portrayed by international media as a battle for the youth vote.⁴⁵

41. NDI, 'Final Report on the Nigeria 2011 Elections' (Washington D.C.: NDI, 2012), 11, https://www.ndi.org/sites/default/files/NDI%20Final%20Report%20on%20the%20Nigeria%202011%20Electionsnew_Part1.pdf.

42. Commonwealth Observer Group, 'Nigeria Presidential and National Assembly Elections', 18.

43. Mona Lena Krook and Mary K. Nugent, 'Not Too Young to Run? Age Requirements and Young People in Elected Office', *Intergenerational Justice Review* 4, no. 2 (2018): 60-67.

44. YIAGA, 'How Youth Fared in the 2019 General Elections' (Abuja: YIAGA, 2020), https://www.yiaga.org/portfolio_post/how-youth-fared-in-the-2019-general-elections/.

45. Colin Freeman, 'Nigeria Election: Gerontocrats Battle for Burgeoning Youth Support as Vote Is Delayed amid Security Concerns', *The Telegraph*, February 15, 2019, <https://www.telegraph.co.uk/news/2019/02/15/nigeria-election-gerontocrats-battle-burgeoning-youth-vote-amid/>.

The formal reduction of age limits also had a real effect, significantly expanding youth participation in the 2019 election. Overall, youth candidates comprised 34.2 per cent of candidates in the 2019 election (up from 21 per cent in 2015). Youth voters also turned out at a higher rate (46.3 per cent) than the general voting population (34.75 per cent), amplifying their voice in an election where turnout was almost certainly diminished by INEC's last-minute decision to delay the poll by one week, purportedly due to difficulties in getting election materials to polling stations on time.⁴⁶ As such, this example stands in contrast to the case of gender, where the recommendations of international observers have gained little traction and done little to open space for the political participation of women.

But care must be taken not to overstate the extent of success when it comes to the inclusion of youth in Nigerian politics. Changes to the age limits for candidates were always likely to be less transformative to the structure of Nigerian politics than affirmative action for women. While the Not Too Young To Run campaign increased youth participation in politics, the reduction in age limits had far less impact on the representation of youth in Nigeria's most recent election. More youth candidates ran, but very few of them were successful, so the overall rate of youth representation across elected positions (the Presidency, National Assembly and State Legislatures) only increased slightly, from 5.1 per cent to 6.6 per cent.⁴⁷

The reason for this relatively modest increase in youth representation is that age, in itself, is not the major obstacle to accessing politics in Nigeria; money and closed party structures are. To get the ticket of either of the leading parties, candidates must spend huge amounts of money and be endorsed by political godfathers. Thus, in the words of one interviewee: 'the current politicians and political figures still control the process of who gets selected as candidates, it [Not Too Young To Run] opens the space, but not that wide'.⁴⁸ Affirmative action for women would be more structurally transformative: if 35 per cent of the seats were to be held by women (as called for in the National Gender Policy), significantly fewer seats would be available to the men currently in office. As such, the implementation of recommendations relating to the political participation of women was always likely to prove the harder task.

A positive development: expanding space for citizen monitors

Another area in which reforms have been made in Nigeria is in creating space for, and supporting the operation of, domestic observer groups. This is an area that several international observers had commented on over time. In 2007, for example, the NDI mission made a recommendation that 'vague references to election observers in the Electoral Act 2006 should be clarified and reinforced so that election observation by domestic monitoring groups is recognised as a legal right'.⁴⁹ It also directed a recommendation to domestic monitors themselves, urging them to expand their activities to include the observation of the adjudication of election-related disputes. In 2011, the EU called on INEC to ensure that its consultations with stakeholders regularly included both domestic and international observers and to increase the timeliness and clarity of procedures for the accreditation of domestic observers.⁵⁰

While few of these specific recommendations have been implemented, the work of domestic observers has steadily increased in both scope and sophistication since 2007. In 2011, for example, the Transition Monitoring Group (TMG) organised a Quick Count (or parallel vote tabulation) conducted by citizen observers. For the first time, according to TMG, this provided an independent verification of INEC's official results in the presidential election.⁵¹ The process was widely regarded as successful - and was repeated in 2015. Other successful initiatives, such as the Nigerian Civil Society Situation Room, have also been scaled up over time. Founded in

46. Figures are for turnout in the Presidential election. YIAGA, 'How Youth Fared in the 2019 General Elections'; International IDEA, 'Voter Turnout Database - Nigeria', International IDEA, accessed June 16, 2020, <https://www.idea.int/data-tools/country-view/231/40>.

47. YIAGA, 'How Youth Fared in the 2019 General Elections'.

48. Interview with former INEC official, by Jamie Hitchen, 6 November 2019, Abuja.

49. NDI, 'Final Report on Nigeria's 2007 Elections' (Washington D.C.: NDI, 2008), 5, https://www.ndi.org/sites/default/files/2313_ng_report_election07_043008.pdf.

50. European Union Election Observation Mission, 'Nigeria Final Report 2011 Elections' (Brussels: European Union, 2011), 201, http://www.eods.eu/library/FR%20NIGERIA%202011_en.pdf.

51. Transition Monitoring Group, 'Quick Count: Accurate, Trusted, Ready for 2015', TMG: Towards 2015, accessed June 16, 2020, <https://www.tmg-towards2015.org/index.html>.

the lead up to the 2011 elections, when it brought together a coalition of over 60 civil society organisations, the Situation Room tracked incidents of violence, the diversion of election materials, and the late arrival or absence of election officials at polling stations – as well as other problems – quickly escalating these issues to INEC for intervention.⁵² In 2019, the Situation Room directly deployed 4,000 observers across the country's polling stations, with an additional 20,000 observers deployed by its member- and partner- organisations.⁵³ This is an impressive number, though given the scale of Nigerian elections, which involve more than 120,000 polling stations, it did not allow all voting places to be observed. Nevertheless, the number of domestic observers easily exceeded the number of international observers on the ground, providing them with an important advantage.

Thus, it appears that in drawing attention to the work of domestic observers, international observers may have indirectly helped to create an environment more conducive to their work. We are, however, cautious in attributing too much credit to the recommendations of international observers here. Our interviews suggest that an important reason for progress in this area is the fact that the work of domestic observers is seen as beneficial, for different reasons, by a range of election stakeholders. For civil society organisations, election observation offers a chance to look more closely at election processes and sound the alarm when malpractice is observed. For donors, who have proved willing to provide extensive funding to domestic observation groups, citizen monitors can provide a strong local voice, bolstering claims that might otherwise be perceived as Western interference. Similarly, the work of domestic observers provides cover to statements made by international observers. For INEC, domestic observers can offer an ally in helping them to keep tabs on the election campaign and process as it happens. Notably, INEC mandates domestic observers to submit their reports to it, a process that feeds in to INEC's own strategic planning.

Even political parties in Nigeria see the benefits of facilitating domestic observation. One benefit is that they can cherry pick positives from the reports of observer groups to support the credibility of their victory or, if they have lost, highlight the negatives to question the credibility of the process and result. Political parties can use the guise of domestic observation to have party supporters accredited to closely observe, and sometimes then exert pressure on, the polls as they take place. INEC vets each group before observation and requires that, to be re-accredited for future polls, they submit reports, but this does not stop groups aligned with political parties from getting accredited. Finally, for the incumbent party, allowing a plethora of domestic observer groups projects an image that they have nothing to hide, even if they do. This confluence of interests, more than the attention drawn by the recommendations of international election observers, helps to explain why the space available to domestic observers has expanded in Nigeria over the last decade. Those recommendations have likely helped by sending a clear signal that international actors view domestic observation as a priority, but this effect appears to have been relatively indirect.

Uganda

Uganda, led by President Yoweri Museveni and his National Resistance Movement (NRM) since 1986, is the least democratic of all the countries covered by our dataset. Though many had hopes for Ugandan democracy after the formal return to multi-party democracy in 2005, the years since have seen a gradual erosion of political rights and civil liberties. As such, the country is now widely considered to be an electoral authoritarian regime. The formal trappings of democracy exist, but there is no realistic prospect of power changing hands through an election. Against this backdrop, it is arguably unsurprising that the recommendations made by international election observers have gained little purchase in Uganda, where only 5 per cent of recommendations have been implemented, and 17 per cent partially implemented. Clearly, the political context in Uganda – where elections are very much 'winner-takes-all' and often marked by violence – is not conducive to the implementation of recommendations made by observer missions.

52. Hamalai, *Nigeria's 2015 General Elections*.

53. Nigerian Civil Society Situation Room, 'Report of Nigeria's 2019 Elections' (Abuja: Nigerian Civil Society Situation Room, 2019), http://www.placng.org/situation_room/sr/wp-content/uploads/2019/09/Report-on-Nigerias-2019-General-Elections.pdf.

Below, we examine some of the challenges to implementation in more detail, as well as instances where recommendations have been implemented against the odds. Again, certain similarities with our other cases studies - Ghana and Nigeria - emerge. As in those cases, the role and nature of the EMB, Uganda's Electoral Commission, has been central, as has the ability of the political elite - in this case the President - to block electoral reforms that might erode their power, permitting only those reforms that do little to shift the political status quo. Yet, as in Nigeria, there are some surprising successes, most notably with respect to the role of citizen monitors. This points to one avenue through which the international democracy assistance community might better protect the integrity of elections in Uganda, though as we discuss in the conclusion such a strategy would come with certain risks and limitations.

A credible commission?

Uganda's Electoral Commission (EC) is viewed by many political activists within Uganda, as well as by many international actors, as sorely lacking in independence. This view was expressed by many of those we interviewed, as well as opposition parties and civil society activists interviewed by other scholars.⁵⁴ Though Uganda's Constitution stipulates that the EC 'shall be independent and shall, in the performance of its functions, not be subject to the direction or control of any person or authority' it also gives the President several important levers of control - the most important of which is the appointment process.⁵⁵ Both the Chair and Commissioners of the EC chair are directly appointed by the President, with the Executive carefully vetting potential Commissioners to make sure they are both loyal and know what will be expected of them. Although their appointments are subject to Parliament's approval, in practice this is a very lax process. The NRM has never lacked a majority in the legislature, and there has never been a case where a Commissioner proposed by the President has been rejected. Though the Constitution limits the grounds on which a Commissioner can be removed by the President, there is no legislative check on his exercise of this power. Against this backdrop, it is hardly surprising that 'heading into the 2016 elections, the President had the EC more or less in the palm of his hand'.⁵⁶

According to those we interviewed, the individual allegiance of electoral officials to the Executive severely constrains the EC's commitment to pursuing reforms, or even pushing ahead on things like voter education - which international electoral observers have often recommended. It does sometimes make small changes. For example, a recommendation made by the EU observation mission in 2006, to redesign the results form to make it clearer and more user friendly, was fully implemented by the EC. The EC has also adopted more technical reforms, which international donors have typically been more willing to fund since such interventions are less likely to be cast as political.⁵⁷ This is most noticeable with respect to voter registration, an area targeted by repeated recommendations from international observation missions. These reforms have helped to improve the quality of Uganda's voter register: after the 2016 election, the EU observation mission noted that the new active registration system, which employed biometric technology, was both more inclusive and more accurate, though it disenfranchised a significant number of young, first-time voters.⁵⁸ Yet the improved register appears to have had little impact on the competitiveness of its elections.

In contrast, the EC has done very little to address recommendations that might do far more to improve the integrity of Uganda's elections, such as those relating to the transparency and accuracy of the vote count. Here, the constraints imposed by its lack of independence become apparent. Without major reforms to the EC, which are in themselves highly unlikely, it is difficult to see that institution driving forward meaningful electoral reforms.

54. See for example, Margaret Sekaggya, Open Society Initiative for East Africa, and AfriMAP, *Uganda, Management of Elections: A Study by AfriMAP and the Open Society Initiative for East Africa* (Nairobi: Open Society Foundations, 2010).

55. Constitution of the Republic of Uganda 1995, section 62. The appointment of commissioners is governed by section 60.

56. Rita Abrahamsen and Gerald Bareebe, 'Uganda's 2016 Elections: Not Even Faking It Anymore', *African Affairs* 115, no. 461 (October 1, 2016): 752, <https://doi.org/10.1093/afraf/adw056>.

57. Jonathan Fisher, 'The Limits - and Limiters - of External Influence: Donors, the Ugandan Electoral Commission and the 2011 Elections'. *Journal of Eastern African Studies* 7, no. 3 (2013): 471-91. <https://doi.org/10.1080/17531055.2013.809206>.

58. European Union Election Observation Mission, 'Uganda Presidential, Parliamentary and Local Council Elections', Final Report (Brussels: European Union, 2016).

The difficulty of building domestic pressure for change

It has been difficult for civil society groups in Uganda to build domestic pressure for change in the same way as we have seen in both Nigeria and Ghana. One reason for this is that civil society lacks political allies within the EC, which is closely tied to the Executive, or within the Parliament, which is dominated by the NRM. That said, Ugandan legislators, including MPs from the NRM, do have a history of asserting themselves on particular issues,⁵⁹ and have proved willing to at least discuss electoral reforms. This has allowed civil society groups to feed proposals for electoral reforms into the legislature, though the reluctance of legislators to adopt reforms expressly opposed by the Executive means that their proposals have rarely gained traction.

In 2014, for example, the government announced its interest in pursuing electoral reform and invited civil society groups to submit their ideas to a constitutional review. This triggered a nationwide consultation process, in which more than 3,000 local leaders and a variety of stakeholder groups (including prominent NGOs working on electoral issues and opposition political parties) came together to propose 46 electoral reforms.⁶⁰ Yet both the Cabinet and the EC put forward their own, less ambitious, proposals - and it was primarily those proposals that made it into the legislation considered by Parliament. Tellingly, one of the amendments put forward in 2015 did little beyond adding the word 'Independent' to the EC's formal title, a change that illustrates just how misleading formal assertions of independence can be⁶¹ and which was ultimately dropped after critics labelled it as 'cosmetic'.⁶²

For a long time, Ugandan civil society has also lacked judicial allies, or at least, has lacked judicial allies that were willing to push on issues opposed by the government. Over repeated elections, the judges of Uganda's Supreme Court, who hear presidential election petitions, have acknowledged that electoral irregularities occurred, but have proven unwilling to rule against President Museveni, generally on the basis that the irregularities were not sufficiently 'substantial'.⁶³ The judges of the High Court, which hears parliamentary election petitions, have proved more willing to annul election results - perhaps because their decisions are far less threatening to the incumbent regime.

There have, however, been some signs of progress in this area. In the wake of the 2016 election, the Supreme Court upheld the presidential result, but made ten recommendations for the reform of electoral management. These included recommendations to extend the time period for filing electoral petitions (as well as the time limit for holding fresh elections, should a presidential election actually be invalidated) and to prohibit all candidates - including the President - from making political donations during the electoral campaign.⁶⁴ Notably, prior to making its recommendations the Court made express reference to the reports of international and domestic observers, noting that 'the main thrust of these Reports must be seen to be directed at the need for structural and legal reforms that would create a more conducive atmosphere that would produce genuinely free and fair elections'.⁶⁵

59. Susan Dodsworth, 'How Does the Objective of Aid Affect Its Impact on Accountability? Evidence from Two Aid Programmes in Uganda', *The Journal of Development Studies* 53, no. 10 (2017): 1600-1614, <https://doi.org/10.1080/00220388.2016.1234039>.

60. Francis Kibirige, 'Disgruntled Opposition or Disillusioned Democrats? Support for Electoral Law Reforms in Uganda', Afrobarometer Dispatch (Accra: Afrobarometer, 2016), https://afrobarometer.org/sites/default/files/publications/Dispatches/ab_dispatchno107_uganda_electoral_reforms.pdf.

61. For a more detailed examination of the gap between formal and informal independence, see Nic Cheeseman and Jørgen Elklit, 'Understanding and Assessing Electoral Commission Independence: A New Framework' (London: Westminster Foundation for Democracy, 2020).

62. Kibirige, 'Disgruntled Opposition or Disillusioned Democrats? Support for Electoral Law Reforms in Uganda'.

63. Jude Murison, 'Judicial Politics: Election Petitions and Electoral Fraud in Uganda', *Journal of Eastern African Studies* 7, no. 3 (2013): 492-508, <https://doi.org/10.1080/17531055.2013.811026>.

64. Amama Mbabazi v Museveni & Ors (PRESIDENTIAL ELECTION PETITION NO. 01 OF 2016) (Supreme Court of Uganda August 26, 2016).

65. Amama Mbabazi v Museveni & Ors (PRESIDENTIAL ELECTION PETITION NO. 01 OF 2016) (Supreme Court of Uganda March 31, 2016).

Though the Court stated that these should be enacted within two years, it was only in 2020 that the Parliament enacted a series of electoral reforms, spread across five bills.⁶⁶ Whether these reforms will help or hinder electoral integrity remains unclear. Though some changes are positive, others have the potential to be used against opposition candidates while changes likely to inconvenience President Museveni – such as the proposal to bar the President from making political donations during the electoral period – were deleted at the last minute.⁶⁷ Thus, the passage of these bills demonstrated the willingness of Uganda’s MPs to consider more meaningful electoral reforms, as well as their unwillingness to support reforms that were clearly likely to earn them Presidential disfavour.

This example shows that Ugandan civil society has been able to build some domestic pressure for the implementation of electoral reforms – including those based on the recommendations of observers. However, it also demonstrates the difficulty of doing so in an environment where political allies in key institutions, such as the EC and Parliament, are scarce. It appears that civil society has not yet found a way of convincing Ugandan MPs that electoral reform is in their interests – though as we discuss below, there may be opportunities to do so on certain issues.

Oversight of campaign finance

As in Ghana and Nigeria, campaign finance has been a frequent subject of the recommendations made by international observers in Uganda – roughly 15 per cent of recommendations made in Uganda are on this topic.⁶⁸ Many of these recommendations have called for strengthening the capacity of the EC to monitor campaign spending and party finance, as well as its ability to enforce existing regulations. Others have focused on restricting the use of public resources, which give the President and NRM a very substantial electoral advantage. In our dataset, none of these recommendations have been coded as implemented – either fully or partially. The only recommendations that have been implemented in this area relate to the provision of public funding for political parties.

This issue of public funding was raised by the Commonwealth observer mission in 2006, which recommended that Parliament ‘change the law to enable eligible political parties to receive State contributions for the election campaign on an equitable basis’.⁶⁹ In 2010, this suggestion was implemented via an amendment to the Political Parties and Organisations Act that inserted provisions allowing for the public funding of political parties. Yet the impact of this legislative change was limited. In practice, public funding has only been disbursed to political parties sporadically: in 2018-2019 for instance, the EC did not allocate any funding due to a budget shortfall. Moreover, public funding is distributed based on the number of seats each party holds in Parliament. This ensures that the NRM benefits more than opposition parties – who have often been outnumbered by independent MPs: in 2016, out of the 10 billion Ugandan shillings (around £2.2 million) provided in public funds, less than 2 billion Ugandan shillings (£440,000) was split among the five opposition parties.⁷⁰ The extent of public funding made available is also dwarfed by the total amounts spent during the campaigns. The Alliance for Campaign Finance Monitoring estimated that Museveni spent at least 773 billion Ugandan shillings (about £170 million) during his successful 2016 presidential campaign.⁷¹

66. These were the Electoral Commission (Amendment) Bill, the Political Parties and Organizations (Amendment) Bill, the Parliamentary Elections (Amendment) Bill, the Presidential Elections (Amendment) Bill, and the Local Government (Amendment) Bill. Parliament passed these bills between February 27, 2020, and March 5, 2020 with the President assenting to the first four of these in July 2020.

67. Godfrey Mwesigye, ‘Parliament Passes Electoral Reforms Ahead of the 2021 General Elections – Parliament Watch’, Parliament Watch, 2020, <http://parliamentwatch.ug/parliament-passes-electoral-reforms-ahead-of-the-2021-general-elections/>.

68. In contrast, very few of the recommendations (less than 2 per cent) made in Uganda address the political inclusion of women and minorities. This is almost certainly due to the higher rate of women’s political representation in Uganda, where women make up about a third of the Parliament. The higher rate of representation is partly due to an electoral system that reserves seats for women, though Ugandan women have proven able to win non-reserved seats as well.

69. The Commonwealth Observer Group, ‘Uganda Presidential and Parliamentary Elections’ (London: Commonwealth Secretariat, 2016), 18.

70. Eriasa Mukiibi Sserunjog, ‘Why EC Should Give Less Money to NRM’, Daily Monitor, May 3, 2015, <https://www.monitor.co.ug/Magazines/PeoplePower/EC-money-NRM/689844-2704014-gc3vuh/index.html>.

71. Abrahamsen and Bareebe, ‘Uganda’s 2016 Elections’.

Arguably, the reason that reforms in this area have gained so little traction is that they go to the heart of how President Museveni and the NRM retain their hold on power. The government's ability to outspend the opposition - in large part due to access to state resources - gives it a significant electoral advantage. Moreover, the President's personal ability to provide funding to NRM parliamentary candidates provides a powerful mechanism of control, helping to ensure loyalty to the party. After the 2016 election, he gifted 5 million Ugandan shillings to each of the NRM's elected MPs, stating 'I know the pressures they are having. That is not corruption. That is helping them cope with the problems of the society'.⁷² In such a context, recommendations that seek to increase the transparency of political finance, and place limits on campaign spending, constitute a serious threat to the way in which political power is exercised and maintained.

While campaign finance is clearly a sensitive issue, it is also arguably one where MPs do have a genuine self-interest in supporting reforms. Becoming an MP in Uganda typically comes with lots of financial risk and a substantial level of debt, most of it taken on by the candidates themselves. In recent years, several Ugandan MPs unable to service their debts have faced threats of imprisonment or foreclosure on properties.⁷³ This suggests that, despite the sensitivity of campaign finance, legislators may be amenable to reforms in this area. The challenge - both for international observers and for domestic advocates of reform - is to convince Ugandan MPs that the benefits of reform outweigh the risk of incurring the President's disfavour.

The role for citizen monitors

In light of the lack of space for electoral reforms in Uganda it is quite surprising that domestic observers have increasingly been able to ensure they are present at all stages of the election process. This is particularly so, given broader attempts to harass and control civil society organisations that engage in more political activities, including through the introduction of restrictive NGO laws.⁷⁴ The recommendations of international election observers appear to have drawn some attention to this issue - putting domestic observers firmly on the agenda - though it is unclear whether their recommendations have directly contributed to the increasing level of access secured by domestic observers.

In 2006, for example, the EU observer mission recommended that the right of domestic observers to observe the whole election process be guaranteed in law. This was not implemented prior to the next election in 2011. Thus, the EU reiterated its recommendation, calling again for legal guarantees of the rights of domestic observers and urging the adoption of clear and objective criteria and application procedures for the accreditation of domestic observers. By the time of the 2016 election, this recommendation had only been partially implemented. Though domestic observers still had no guaranteed right to observe the entire election process, the EC issued a handbook for observers that more clearly articulated the role of observers, the scope of observation and what - in its view - constituted acceptable conduct by observers.⁷⁵

As in Nigeria, it appears that domestic election observation has begun to flourish in Uganda because it generates a number of benefits to those in power without seriously threatening their positions. Many of those we interviewed suggested that domestic observers have been allowed to observe the election process because they do not pose a threat, in the eyes of the government, to the overall outcome. Domestic observation is a post mortem of the election, they explained, but it does not change what happens on election day. Thus, the presence of domestic observers helps to legitimise the electoral process without inhibiting the government's control of the election outcome. To help ensure this, the EC has continued to maintain a high degree of control over domestic observers, including by requiring checks with the security services as part of the accreditation process.

72. Quoted in Daily Monitor, 'Museveni Defends Shs5m Gift to MPs', Daily Monitor, May 20, 2016, <https://www.monitor.co.ug/News/National/Museveni-defends-Shs5m-gift-to-MPs/688334-3210686-h07552z/index.html>.

73. Eriasa Mukiibi Sserunjogi, 'Ugandan MPs Drown in Debt', Al Jazeera, September 4, 2014, <https://www.aljazeera.com/news/africa/2014/09/ugandan-mps-drown-debt-2014938157674558.html>.

74. Godfrey M Musila, 'Freedoms Under Threat: The Spread of Anti-NGO Measures in Africa' (Washington, D.C.: Freedom House, 2019), <https://freedomhouse.org/report/special-reports/freedom-under-threat-spread-anti-ngo-measures-africa>.

75. Electoral Commission of Uganda, 'General Elections: Handbook for Observers' (Electoral Commission of Uganda, 2016).

There are also real constraints on the degree to which domestic observers can access critical parts of the electoral process, such as tallying and counting. Thus, the failure to fully implement recommendations to provide a legal guarantee of such access remains a significant shortcoming, one that leaves domestic observers vulnerable to rule changes that further limit their ability to monitor the election process. Such rule changes are not just theoretical: in 2020, when the Parliament was considering a series of electoral reforms, the Chair of the EC, Justice Simon Byabakama, proposed a ban on the use of cameras at polling stations.⁷⁶ This would have significantly limited the ability of observers to document irregularities. Fortunately, many MPs - including members of the NRM - were sceptical of this proposal and it was not endorsed by the Parliament's Committee on Legal and Parliamentary Affairs, which was tasked with reviewing the relevant bills.⁷⁷ Consequently, it appears that this proposal was not adopted by the Parliament when it passed those bills.⁷⁸

Domestic observation may have begun to flourish in Uganda, despite a very challenging operating context, but whether it will continue to do so remains an open question. Recommendations from international election observers may help to keep this issue on the table, as they have done in the past, though their full implementation may remain quite unlikely. Thus, this issue demonstrates that implementation is not the only metric by which the 'success' of observers' recommendations should be judged. In some cases, such as Uganda, observation missions know full well that their recommendations are unlikely to be implemented. This does not mean, however, that they have no effect.

Implications

Three key findings emerge from our analysis, each of which has important implications for election observers and the broader democracy assistance community. First, it is clear that a significant proportion of the variation between countries, in terms of the rate at which recommendations are implemented, can be explained by reference to the nature of each country's EMB. Where a country, such as Ghana, has a relatively well-resourced and independent EMB, we see a greater proportion of recommendations being fully and partially implemented. This effect is arguably magnified by the fact that international observers direct more recommendations to EMBs than any other actor. Yet there are clearly limits on what an EMB can achieve - as the experience of Nigeria's INEC makes clear. Even an EMB that has strengthened its capacity and autonomy will struggle to implement recommendations that would fundamentally transform the status quo without the backing of political elites - who are likely to find such a transformation threatening.

This finding suggests that there is much to be gained by building strong relationship with EMBs, and helping them to build both their capacity and independence, something that many of the organisations that mandate observer missions already to work hard to do. Yet it also suggests that international election observers, and the democracy assistance community, should not lose sight of the broader political picture. EMBs need allies - both within political institutions, such as parliaments, and within civil society - if they are to push forward more ambitious electoral reforms. Programmes that seek to build stronger bridges between these different actors may therefore deliver significant rewards.

76. The Independent, 'US MISSION: No Reason to Ban Cameras at Polling Stations', The Independent Uganda, September 18, 2019, <https://www.independent.co.ug/us-mission-no-reason-to-ban-cameras-as-polling-stations/>.

77. Parliament of Uganda, 'Report of the Sectoral Committee on Legal and Parliamentary Affairs on the Presidential Elections (Amendment) Bill 2019' (Kampala: Parliament of Uganda, December 2016); Parliament of Uganda, 'Report of the Sectoral Committee on Legal and Parliamentary Affairs on the Parliamentary Elections (Amendment) Bill 2019' (Kampala: Parliament of Uganda, December 2016).

78. We have been unable to confirm this definitively. The final versions of the Acts have not yet been published, as the President only assented to four of the bills in July 2020. Hansard debates would provide a record of amendments made during debates, but those for the relevant period have not yet been published. Media coverage of the passage of the bills makes no mention of this particular amendment being adopted, but does note other changes.

Our second key finding is that recommendations addressing certain topics are much harder to implement than others. The standouts here are recommendations relating to campaign finance and the political participation of women. Both are areas of significant concern to the international community - as well as citizens across Africa, with repeated recommendations from observers recognising the fact that the 'cost of politics' has become extreme, while the continued underrepresentation of women in political life constitutes a real threat to the quality of democracy in too many African countries. Progress here has been slow, in large part because reforms in these areas would represent fundamental challenges to the political status quo.

This leads to our third key finding, which sheds some light on what might be done to get better traction in these difficult cases. When recommendations have been implemented 'against the odds' it has typically been the product of well-organised and cohesive campaigns led by domestic civil society - as was the case with Not Too Young to Run in Nigeria. This represents a valuable lesson learnt, but it also constitutes a challenge for international election observers, whose engagement in each country tends to focus on the period immediately around election day - despite recent efforts to shift toward longer-term election observation. In short, international election observers are not well placed to foster or support the kinds of campaigns that are necessary to get their more challenging recommendations implemented. This suggests a need for a stronger connection between international election observation and the broader democracy assistance community, who are better placed to conduct this kind of work over a sustained period of time.

Though the media, and many academics, have tended to focus on the 'verdicts' of international observers, and their behaviour in the period immediately around election day, the recommendations made by these groups are an essential part of their work. For too long, we have paid too little attention to what kind of impact these recommendations have over the longer term, and what might be done to increase it. International election observers will probably never see all of their recommendations implemented. Indeed, aiming for such an outcome may be undesirable, since it might deter observers from making ambitious recommendations with the potential to truly transform the nature of elections. Yet this paper suggests that there are ways for international observers, working with the broader democracy assistance community, to improve the uptake of their recommendations and strengthen their contribution to improving electoral integrity over the longer term. This will not be an easy task, but it is one worth doing.

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