



Street level bureaucrats, policy entrepreneurship, and discretion in enforcing bans on motorcycle taxis in Lagos, Nigeria

Rob Ackrill¹  | Eghosa Igudia²   |
Olasunbo Olusanya³  | Basirat Oyalowo⁴ 

¹Department of Economics, Nottingham Business School, Nottingham Trent University, Nottingham, UK

²Faculty of Business and Law, De Montfort University, Leicester, UK

³Department of ER&HRM, University of Lagos, Akoka Yaba, Lagos, Nigeria

⁴Department of Estate Management, University of Lagos, Akoka Yaba, Lagos, Nigeria

Correspondence

Rob Ackrill, Department of Economics, Nottingham Business School, Nottingham Trent University, Burton St, Nottingham NG1 4BU, UK.

Email: robert.ackrill@ntu.ac.uk

Funding information

British Academy, Grant/Award Number: TGC/200070

Abstract

Recently, the authorities in Lagos have implemented policies progressively restricting the operation of okadas (motorcycle taxis). We analyze the enforcement of these measures through the lens of street-level bureaucrats (SLBs) and street-level policy entrepreneurs (SLPEs). Doing so, we introduce two novel features into the literature. First, the extant literature focuses primarily on policies that deliver public services, whereas policies can also control proscribed behavior. We refer to these as service delivery and regulation, respectively. Second, the exercise of discretion by SLBs and SLPEs can result in both “under-enforcement” and “over-enforcement” of regulatory policies, the latter potentially involving breaking the law. Drawing on extensive fieldwork in Lagos between 2021 and 2023, we find strong evidence of both under-enforcement and over-enforcement of okada bans over time, but with more over-enforcement. This offers important insights conceptually for the SLPE literature and empirically to the challenges of policing urban Lagos.

This is an open access article under the terms of the Creative Commons Attribution-NonCommercial-NoDerivs License, which permits use and distribution in any medium, provided the original work is properly cited, the use is non-commercial and no modifications or adaptations are made.

© 2023 The Authors. *European Policy Analysis* published by Wiley Periodicals LLC on behalf of Policy Studies Organization.

KEYWORDS

discretion, enforcement of bans, motorcycle taxis (okadas), street-level bureaucrats, street-level policy Entrepreneurs

1 | INTRODUCTION

In recent years, the Lagos State Government has introduced multiple measures, of increasing severity, to regulate okada (motorcycle taxi) riders. These restrictions, leading ultimately to outright bans and the criminalization of both the riders and their passengers, have been justified on a number of grounds. These include seeking to cleanse the urban environment and make it attractive to (foreign) investors, seeking to improve the traffic flow in a metropolis with infamously bad traffic jams, seeking to reduce crime with okada riding being used as a cover by criminals, and to reduce serious and fatal accidents. These bans are therefore presented as being in the interests of Lagosians.

This, however, is only a partial picture of the everyday lived reality of Lagosians. Banning activities that they continue to seek to use on a daily basis will, at the very least, inconvenience them. Such bans, built on a neoliberal agenda of cleansing the city, also deny those living in poverty from a major income-earning opportunity. These policies thus create a tension with citizens' "everyday" lived reality (see, inter alia, Igudia et al., 2022, and the studies cited therein). Furthermore, these bans create an "urban paradox" (Olajide & Lawanson, 2022). The removal of an earning opportunity for informal economy workers worsens poverty, pushing more people into informal economic activities—including those that policy-makers wish to cleanse from the city. This can also drive more people to crime. Meanwhile, the challenges of traffic jams and navigating Lagos remain.

Any policy banning an activity must be enforced to achieve the intended outcomes. In this paper, we analyze the enforcement of restrictions and bans on okadas through the lenses of street-level bureaucrats (SLBs), policy entrepreneurs (PEs), and their more recent conjoining as street-level policy entrepreneurs (SLPEs). Following the literature, we reflect on Lipsky's (1980) "policy as written" versus "policy as performed." The significance of this stems from the fact that the measures are not seen as unambiguously benefiting, or universally supported by, Lagosians (in our research, over 90% of the 1700+ survey respondents felt that outright bans were not the right way to deal with these problems).

In undertaking this analysis, we also offer novel extensions to the ways in which these concepts are formalized. First, whilst most of the empirical SLB and SLPE literatures focus on challenges in the *delivery* of public services (common applications include health and social care, education, etc.), we argue that efforts to enforce policies that seek to *control* proscribed behaviors presents SLBs with a more complex set of choices regarding policy implementation. We label these two policy types as "service delivery" and "regulation." Second, and following from this, the discretion exercised by SLBs and SLPEs in enforcing regulatory policies can have both positive and negative aspects. We label these "underenforcement" and "overenforcement." Underenforcement of regulatory policies is seen as being beneficial in some way to the recipients. Overenforcement, however, represents a very different exercise of discretion, in that when enforcing regulatory policies, the actions of SLBs might exceed what is necessary to enforce the policy. Indeed, as we shall see, this might even go as far as exceeding the boundaries of the law.

From the foregoing, we derive our research question: How does the exercise of discretion by SLPEs manifest itself in the enforcement of okada bans in Lagos, Nigeria?

To seek answers to this question, we adopted multiple sequential and cumulative methods of data collection, discussed in detail below. Interviews were conducted with key stakeholders in September 2021. These informed the design of a survey that was distributed across Lagos in January and February 2022 and yielded over 1700 responses. A preliminary analysis of findings was presented to a stakeholder workshop in July 2022, informing initial discussions around reactions to those findings, organized in a World Café format. In August 2022, we supplemented this with a novel form of data collection, buying slots in radio phone-in programs to access views from individuals who might otherwise have been excluded from our data collection (as discussed further below). These outcomes, combined with continuing analysis, were presented to a second stakeholder workshop in April 2023. This was also run in a World Café format, but focused on what the participants saw as the best ways to move forward, toward a more inclusive policy approach to informal economic activities and workers.

In the remainder of this paper, we lay the groundwork for what follows by reviewing relevant literatures, with a primary focus on the theoretical literatures relating to PEs, SLBs, and SLPEs. We also reflect on empirical studies linked to our particular topic of concern. Following this, we lay out the empirical case, of restrictions and bans imposed on okadas in Lagos, and discuss the related issue of the ways we collected and analyzed the data in Lagos about these policies. We then provide a detailed analysis of the data, structured around the concepts of SLBs and SLPEs, incorporating the novel distinctions between service delivery and regulatory policies, and their underenforcement and overenforcement. We finish with a discussion reflecting on these analytical details, before concluding with an overview and suggested areas for future research.

2 | LITERATURE REVIEW

In this research, we draw on three closely related concepts—PEs, SLBs, and SLPEs—to frame our analysis of how the Lagos State Government's ban on okadas has been enforced. In this section, we first review the literatures on these three concepts, before locating a series of conceptual innovations that seek to formalize specific aspects that we argue are currently undertheorized. We also provide a brief review of the limited empirical literature that addresses the policies and practices most closely aligned with our own policy focus. This provides a lead-in to a discussion of our research, and our approach to data collection, in the next section.

2.1 | PEs, SLBs, and SLPEs

We reflect first on PEs, who are active at the agenda-setting and decision-making stages of the policy process. We do so only briefly, however, to provide context for understanding how SLBs can become SLPEs. SLBs are active in implementing the policies that have been decided upon. SLPEs develop this further, by circling back to influence policy in some way through their implementation decisions.

PEs, as a distinct actor-group, were first identified by John Kingdon (Capano & Galanti, 2021, p. 323). Kingdon (2003, pp. 122–123) defines PEs as individuals who are willing to “invest their resources—time, energy, reputation, and sometimes money—in the hope of a

future return ... in the form of policies of which they approve, satisfaction from participation, or even personal aggrandizement in the form of job security or career promotion,” although we have “many, *many* ways to describe policy entrepreneurs” (Cairney, 2020, p. 200, emphasis in original). PEs thus identify problems and then engage with policy-makers to promote their preferred policy solutions to those problems.

Whilst Kingdon, naturally, discusses PEs in the context of the multiple streams framework (MSF), in particular analyzing the ways in which PEs exploit windows of opportunity to couple the problem, policy, and politics streams, PEs as a group have been given a life beyond the MSF (inter alia, Arnold, 2021, p. 970). The literature has also recognized the importance of the conceptual distinction between PEs as individuals or groups, and policy entrepreneurship as the activity they undertake (inter alia, Ackrill & Kay, 2011; Capano & Galanti, 2021). This reflects the point that “policy entrepreneurs are identifiable primarily by the actions they take rather than the positions they hold” (Cohen, 2021, p. 18). Even nearly four decades after Kingdon published his groundbreaking study, researchers continue to refine our understanding of who PEs are and what they do (see, amongst many, Cairney, 2018; Frisch Aviram et al., 2020a, 2020b; Mintrom, 2020; Petridou & Mintrom, 2021). For a review of policy entrepreneurship research in developing countries, see Frisch Aviram et al. (2020a, 2020b).

Further along the policy process, SLBs are public officials who work at the interface of policy and public, whose job it is to implement policy on behalf of both the organization they work for and their clients at whom the policy is aimed. There have long been known to be gaps between “policy as designed” and “policy as implemented” (Pressman & Wildavsky, 1973); or between “policy as written” and “policy as performed” (Lipsky, 2010, xvii). In the context of research on SLBs and how they undertake their roles, one cause of this gap might be where SLBs have “substantial discretion in the execution of their work” (Lipsky, 2010, p. 3).

Why, though, might SLBs exercise discretion in implementing policy? We start with SLBs’ relationship with the policy they are expected to implement. A useful way of framing this is “policy alienation,” adapted by Tummers et al. (2009) from Marxist readings of “work alienation.” They identify three elements to policy alienation: policy powerlessness, policy meaningfulness, and rule conflicts. Tummers et al. themselves refer not to SLBs but to “professionals,” although this is itself an important part of the definition and understanding of who SLBs are.

Policy powerlessness relates to the extent to which SLBs have, or lack, influence over designing the policy they then have to implement. This could manifest itself as having no say over the drafting of a new policy; having no say over decisions regarding translating policy goals into “specific performance requirements,” including resource allocation (Tummers et al., 2009, p. 688); and specifically lacking discretion over how a policy is implemented. These three aspects reflect key stages along the policy process, from decision-making to implementation.

Policy meaningfulness relates to the extent to which SLBs perceive a connection between the specific policy and the ultimate end goal, or “greater purpose” (Tummers et al., 2009, p. 689). SLBs might question whether the policy actually addresses the problem at hand; whether specified output goals align with societal goals; and whether they as SLBs are making a difference.

Role conflicts arise for SLBs given their position between the organization for which they work and the clients with whom they work. In this position, “when implementing a policy, it is vital that professionals not only identify with their organization, but also with the clients they treat” (Tummers et al., 2009, p. 690). SLBs will reflect on policy content, managerial demands

over implementation, the demands they feel from being part of a profession, and the demands, needs, and expectations of the clients. Role conflicts arise when these do not align.

Other analytical framings of the factors that motivate SLBs to exercise discretion are identified in several papers. We review two such studies here as illustrative of this literature: Tummers et al. (2012) and Cohen (2018). Each of these studies identifies three sets of characteristics that influence SLB behavior. Tummers et al. (2012) refer to policy content, organizational context, and personality characteristics—or “what,” “where,” and “who.” Cohen (2018) offers personal (or individual), organizational, and cultural characteristics. Tummers et al. (2012) offer policy content, which complements their¹ earlier work and its focus on engagement with specific aspects of policy-making and implementation. In the earlier paper, they consider policy meaninglessness as one element of policy content, but defined by policy as perceived separately by each of society, clients, and themselves. They also include discretion and (in our terminology) SLBs’ willingness to exercise discretion as the second factor under policy content.

Organizational context and personal factors are considered by Tummers et al. (2012) and by Cohen (2018). Tummers et al. (2012) incorporate the elements from their 2009 paper as an organizational factor, so that the more SLBs have been part of the policy process (as a facet of how the organization functions), the more willing they will be to implement the policy (by implication, the policy as written). They also identify two further organizational factors—how favorably managers view a policy, and how favorably other professionals view a policy. Cohen (2018) identifies a different set of organizational factors at play. He focuses on resources, both financial and material, provided to SLBs (see also, amongst many, Brodtkin, 2011, 2012), and incentives provided to SLBs, for example, salaries.

Regarding personality characteristics, Tummers et al. (2012) identify two specific traits—rebelliousness and rule compliance. Cohen, however, takes a broader view, reflecting on “doing the right thing,” gaining a “good feeling,” and so forth, albeit developed in the specific empirical context of “informal payments for health care” to doctors and nurses in Israel.² It is also in this broader context that Cohen brings in culture. With weak or inefficient formal institutions, Cohen argues that SLBs will be more likely to reflect the informal institutions of local norms and customs in their exercise of discretion.

Turning to the literature on SLPE, we start by noting “the reality that, when implementing a policy, implementers are in fact making policy” (Tummers et al., 2012, p. 719). This quote is a useful starting point, as it recognizes the impact that SLBs have on a policy by their actions, but also suggests that there might not be a clear and obvious distinction between SLBs and SLPEs. That said, “the difference between a street-level bureaucrat who exercises discretion, and a PE, lies in their scope and accountability” (Cohen, 2021, p. 20), which, whilst not offering an absolute distinction, at least gives a basis for reflecting on the different activities of actors.

The literature on SLPEs has presented two distinct perspectives on how SLBs act as PEs. The first, which goes beyond the view of Tummers et al. (2012) that policy implementation is “in fact” policy-making, demonstrates that SLBs can be seen to act as PEs through the ways in which they implement policy (inter alia, Arnold, 2015; Durose, 2007; Petchey et al., 2008). The second strand presents evidence that SLBs undertake what we might call Kingdonian policy entrepreneurship; that is, SLBs act as SLPEs by their ability to influence policy design (inter alia, Cohen, 2021; Cohen & Aviram, 2021; Lahat et al., 2023).

This marks the point of departure of the present study. In the aforementioned literatures, both theoretical and empirical, the focus on discretionary acts by SLBs and SLPEs has generally been to analyze their positive consequences, in that discretion is often exercised to overcome

one or more of a variety of challenges (such as policy design, resources, etc.) in service delivery. It is possible that this exercise of discretion could have negative consequences. Cohen (2018, p. 185) notes that the behavior of health-care workers “can be destructive to Israel’s health care services,” but his focus is on attitudes toward gifts, favoritism, and bribes—the second and third of which are seen by his participants as negative. More widely, the possibility of discretion exercised for “positive” reasons, related to service delivery, might leave implementation gaps, which could be perceived as “negative.” This remains underexplored in the literature: “For example, is it possible that street-level bureaucrats could engage in malicious, destructive policy entrepreneurship that might not be in society’s best interests?” (Cohen & Aviram, 2021, p. 434). We highlight this as a topic for further research (as implied also by Cohen and Aviram’s question). It is beyond the scope of the present paper to explore this issue in detail, as our primary focus is on the underenforcement and overenforcement of regulatory policies. Rather, we note the positive and potentially negative consequences of discretion exercised in the practice of service delivery measures as a counterpoint to discretion in implementing regulatory policies.

2.2 | Underenforcement and overenforcement in the empirical literature

The limited literature that explores issues approximating these concepts focuses, perhaps unsurprisingly, primarily on policing. Interestingly, this literature has emerged only very recently, which suggests timeliness in our efforts to theorize these empirical features. Some studies focus on officers seeking to do the best in a difficult situation, which includes reflecting on their willingness to risk their life (Cohen, 2022; Cohen & Golan-Nadir, 2020). Other studies, in ways akin to research on other public services, look at how police adapt implementation for the benefit of clients/citizens (inter alia, Brockmann, 2017; Cohen, 2023; Cohen & Cohen, 2023). One recent study suggests “minimal compliance with job requirements” (Lotta et al., 2023, p. 2) when working under coronavirus disease 2019 (COVID-19) conditions, as a means of self-preservation. A case of ineffective enforcement highlights police traffic officers in Nairobi who, although lacking the resources needed to enforce road traffic laws fully, did not even optimize the use of the resources they did have, by not monitoring traffic at the times and locations that accidents were most prevalent (Sidha et al., 2021).

Very few studies address what we are calling overenforcement. A central feature of SLB actions is that they are perceived as legitimate by their clients. Indeed, it has been claimed as a “fact that the public usually trusts street-level bureaucrats, because it sees them as not motivated primarily by political concerns, [which] allows them to engage in” turning policies into action through “their genuine commitment to improved social outcomes” (Cohen & Klenk, 2019, p. 215). Two recent studies analyzing policing in the United States explore issues where the actions of the police actually undermine trust. One study evaluates the impact of block-level ethnic make-up in Minneapolis and the rate of vehicle stop-and-search actions. Ultimately, “Black (whether native or foreign born) populations of people are more likely to have investigatory interactions with police officers” (Wright et al., 2021).

A second study explores two case studies,³ of police actions that in each instance led to the death of an arrested African American man, in Baltimore (Freddie Gray) and New York (Eric Garner) (Koven, 2023). In this study, the actions of the police are linked to the concepts of administrative evil (which can arise when “hierarchical superiors do not rebuke actions that

result in unnecessary suffering”; Koven, 2023, p. 9), moral inversion (“portraying ... actions as justifiable based on a conception of the greater good”; Koven, 2023, p. 4) and thus discretionary abuse. Koven demonstrates how the details of the cases, including the responses of courts as well as the police hierarchy, embody these concepts. As such, Koven (2023) links most closely to the present study.

2.3 | Okada riding: Issues and challenges

We now turn briefly to some of the empirical literatures related to our topic of study. Studies analyzing accidents arising from okada riding have shown that even some earlier restrictions had a significant positive impact on safety for riders and passengers. The literature analyzing the effects of the 2012 partial ban on okadas confirms a significant decrease in accidents and deaths (Emiogun et al., 2016; Surulere & Campbell, 2020; Venkatraman et al., 2019). Indeed, accidents involving okadas were the subject of investigation even before the 2012 policy was introduced (Oluranti, 2011). The precise numbers quoted must be treated with caution, and these studies do not formally identify causality, but in the 8 months following the 2012 bans, deaths were 75% lower than the 8 months prior, with the majority of fatalities recorded in health facilities located in areas where there was a high density of roads (Venkatraman et al., 2019). An analysis of motorcycle death autopsy data, comparing 2 years before the 2012 ban with 2 years after, showed that 75% of 128 autopsies came before the ban, whilst the percentage of total road traffic deaths involving motorcycles fell from 23.4% to 11.2% (Emiogun et al., 2016). This picture was also reflected in data for injuries (Surulere & Campbell, 2020).

In the face of such dangers, interviews with okada riders in Ibadan, Nigeria, found that risk-taking is “generally acceptable,” “an intrinsic part of occupation,” and “a way to make ends meet” (Sanusi & Emmelin, 2015, p. 328). Statistics for injuries and deaths are therefore unlikely by themselves to deter individuals from becoming okada riders. In the context of the bans in 2022, the issue of accidents and deaths became a key argument for the Lagos authorities, with the claim that over the 3 years 2017–2019, there had been 10,000 accidents and over 600 deaths. These figures have, however, been questioned, with data from the National Bureau of Statistics showing 10,000 accidents per year across the whole of Nigeria.⁴

Some of the studies exploring okadas also highlight “overenforcement.” Earlier restrictions on their operation led to “conflict” (seen in the titles of Agbiboa, 2018, 2020a), with “violent and venal” implementation of the 2012 traffic law (Agbiboa, 2018, p. 2). Reflecting on the argument around okada riders’ criminality, Agbiboa (2022, p. 130) refers to their scapegoating as “could-be terrorists.” The challenges in Nigeria around trust in the authorities were brought into sharp focus in 2020, with the #EndSARS protests against Nigeria’s Special Anti-Robbery Squad. This hashtag first appeared in 2018, to highlight concerns over “violence and exploitation by SARS officials” (Uwazuruike, 2020). In 2020, “reports of an unprovoked shooting of a boy in the streets of Delta State by SARS operatives [that] were shared on social media” triggered widespread protests that were met with more violence (Uwazuruike, 2020). Ultimately, the banning of okadas in large parts of Lagos—and, by extension, the enforcement of the ban—is set against a backdrop of deep mistrust of the authorities, especially the police (Agbiboa, 2015; Ike et al., 2022).

The literature on policing and law enforcement therefore identifies discretion as being necessary in some cases, to enhance service delivery (in a manner similar to health provision, e.g.), a factor to explore in contexts where officers’ lives might be at risk, but also a feature that

can result in what some would see as negative outcomes, even where violence might be defended and justified morally by the authorities. It is against this backdrop that we now consider recent efforts to implement ever tighter restrictions on okadas in Lagos. In conceptualizing our contributions to the literature, in what follows we capture some of the same ideas as Koven (2023) in particular, but we frame them explicitly in the context of the literatures around PEs, SLBs, and SLPEs. In so doing, we provide a way of embedding greater breadth in the nature and scale of enforcement than just the largely positive, or negative, framings that appear in individual studies in the extant literature reviewed above.

3 | CASE AND METHODS

3.1 | The use and regulation of motorcycle taxis, or okadas, in Lagos

In this section, we first present details of the empirical focus of the paper, followed by a discussion of the research methods embedded in the research design. Motorcycles are not just a mode of individual mobility in Africa, they constitute a major part of the public mobility system (Bishop & Courtright, 2022), especially the informal transport or “paratransit” (Agbibo, 2020b) system. In Lagos, moreover, they play a vital role in keeping the city moving. Lagos is a city with infamously bad traffic, where citizens spend an average of 30 h per week in jams.⁵ Traffic can be so bad along some routes that there is time for food vendors to come along, prepare meals, and clean up the utensils afterwards.⁶ One interviewee for the present research gave the example of a journey within Ikeja LGA (home to the seat of government) that could take 90 min by car, but 5 min by okada.

First-mile/last-mile trips in particular are where Lagosians lack public transport options. Interviewees noted that even where alternatives to okadas are available on such routes, they may not be able to navigate the narrow passageways that okadas can fit down—routes that are also often in a very poor state of repair. As one participant conceded in the July 2022 workshop (this and our other data collection activities are discussed below), “yes it is lawless, but it fulfills a need in micro transportation, that is, transportation in micro areas and economic empowerment for those who have been economically disenfranchised.” During the July 2022 workshop, one government official spoke of people’s laziness and lack of willingness to walk—a comment aimed implicitly at the question of first-mile and last-mile journeys. As if to pre-empt this, however, in September 2021 in an interview with representatives of FIWON, the Federation of Informal Workers’ Organizations of Nigeria, this view was described as “middle-class nonsense, [from] people who are oblivious to the realities.”

This observation notwithstanding, the presence of okadas is not universally welcomed. For over a decade the Lagos State Government has implemented policies that started by restricting okadas from hundreds of roads, progressing to an outright ban in 10 of Lagos State’s 20 local government areas (LGAs) in 2022.⁷ These measures have been motivated by multiple concerns, as outlined above. The 2012 Lagos State Road Traffic Law identified nearly 500 roads, out of over 9000, from which okadas were banned. Governor Fashola had, in 2010, wanted a total ban, but opposition from okada riders, including a court case, led to this compromise. The ban itself had been motivated in part by hospital data indicating 646 okada-related injuries and 16 deaths per month. Governor Ambode, taking office in 2015, restated the ban. This included a previous measure banning motorcycles of engine size 200 cc or below from major routes including the main highways, where a significant number of accidents and fatalities occurred.⁸ In the end,

however, more okada riders acquired larger motorcycles with an engine size above 200 cc,⁹ putting more powerful machines on inner-city routes as well.

With accidents and motorcycle-related crime continuing, by 2016 Governor Ambode was also seeking a total okada ban. Again, this did not come to pass. Instead, in 2018 and after “consultations with stakeholders, the State Security Council, in compliance with the extant Transport Sector Reform Law 2018, decided to commence enforcement of the law.”¹⁰ This, tellingly, demonstrates not only a decade of evolving restrictions on okadas but also of fluctuating enforcement of those restrictions (an issue we explore in detail later).

In 2020, Governor Sanwo-Olu restated the enforcement of the existing bans. More recently, “the Lagos State Commissioner of Police, CP Hakeem Odumosu ... ordered officers and tactical commanders of the command to immediately embark on full enforcement of restriction order of the state government.”¹¹ In mid-2022, however—and having already moved to enforce fully the bans that were in place—total bans were imposed; first in six LGAs in June 2022, followed in September by a further four LGAs. At a research project workshop held in Lagos in July 2022 (see below), a representative from a government Ministry was clear that the authorities were “forced” to ban okada riders, given their failure to follow the law. That said, they also suggested that “I think one of the reasons it is still thriving is because people don’t have so much trust in government and government pronouncements and it has to do with the kind of lifestyle we live, we do things with impunity.” This restates the lack of trust in the Lagos authorities, including enforcement agencies, but also that there is a wider disregard for laws and rules. One particular manifestation of this is the association of okada riders with criminality, an issue we explore further below. Ultimately, informal transport or paratransit systems in Africa:

are, above all, a way of life, *an organizing urban logic that cannot simply be banned*. An issue here is not just the informal sector, but the entire transport culture of African cities. As a vital element of mass mobility, paratransit services are embedded in social networks that are integral to the informal infrastructure of African cities (Agbiboa, 2020b, p. 181; emphasis added).

3.2 | Methods of data collection and analysis

Given the foregoing, it is inevitable that any measures taken against okadas would also have significant consequences for the citizens of Lagos. To answer our research question, we thus undertook an extensive program of data collection, from both okada riders and citizens. This began in September 2021 with a series of interviews undertaken by the authors. Participants included 14 senior officials from six government Ministries, 15 okada riders and union leaders, and FIWON officials. Thematic analysis of this information then informed the design of questionnaires, which were undertaken in January and February 2022.¹² The authors, supported by two research assistants, recruited and trained a team of undergraduate students to undertake the survey.¹³ The questionnaires were completed in English, but the research assistants and students helped to translate for the small proportion of respondents who were more confident in other languages, especially Pidgin or Yoruba. In total, over 1700 usable responses were received, split broadly equally between okada riders, citizens, and street hawkers (see footnote¹³).

The team distributed the questionnaires across all 20 LGAs in Lagos, in proportion to the share of each LGA in Lagos’s total population. The exact sampling process was complex as

different factors needed to be balanced. First, there was a purposive sampling of okada riders, whilst “citizens” were defined by clearly not working as okada riders (we acknowledge that “citizens” might include okada riders on a day off, but given the economic context of okada riders’ work, such numbers are likely to be extremely limited). Second, we describe our approach to street-by-street sampling of every other eligible adult as “semirandomized”: a balance was needed between trying to reflect the entirety of each LGA given that we were unable to cover all parts of each LGA, whilst also needing to operate in localities where okada riders were likely to be found. Given the face-to-face nature of the data collection and the profile of the researchers reassuring participants that they were not from, in particular security forces, nearly 100% of those approached agreed to participate.

In July 2022, soon after the first of the outright bans was introduced, we held a stakeholder workshop at which an initial exploration of the interview and survey results was presented, along with a discussion of the nature and scale of the challenges faced. This initiated the process of co-creating possible ways forward for the governance of informal economic activities other than outright bans. The workshop was run in a World Café format. In August 2022, we supplemented this with a novel approach to data collection, where we paid for two slots, 1 week apart, in a popular radio phone-in program conducted in pidgin English. We set down the questions to be asked, along with the required ethics-related statements to ensure callers understood that the program segments were paid for by us, and for what the information shared (anonymously) would be used. This enabled us to obtain additional data after the first ban, with citizens who might have been missed from any earlier data collection efforts for work or language reasons. The cost limited the airtime bought, but we got a further seven contributions.

The outcomes of the foregoing fed into a second stakeholder workshop in April 2023. This was run on a similar basis but was more forward-looking, toward a more inclusive policy approach to informal economic activities and workers. Both workshops brought together senior officials from multiple Ministries, representatives of informal economy workers’ organizations, security forces, citizens, and journalists. Over the two workshops, 105 people were present. A number of individuals were present at both workshops, which helped to give continuity to the discussions, from the problems to potential solutions.¹⁴

We would note here that all individuals who completed the questionnaire were given NGN 1000 for their time (especially as okada riders were not out earning). This equates to about 80 pence at the official exchange rate at the time (or perhaps just a can of drink). This was judged to be sufficient compensation without distorting anybody’s decision over whether to participate in the research or not. In addition, and in accordance with local practice, we provided workshop materials and covered the transportation costs for workshop participants.

The data incorporated into the present paper were drawn principally from a close reading of the transcribed interviews, qualitative questionnaire responses, workshop discussions, and translated phone-in answers. The coding and content analysis included both deductive and inductive codes. The deductive codes were derived from the literature review and included latent codes that focused on actions taken by individuals consistent with the theoretical concepts of policy entrepreneurs, SLBs, and SLPEs (e.g., “implement,” “enforce,” etc., but also “decide,” “choose,” and synonyms), and manifest codes focused primarily on enforcement or implementation (e.g., “arrest,” “confiscate,” “remove,” etc., but also “bribe,” “abuse,” “violence,” and similar).

The inductive codes reflected primarily the specifics of the case under investigation, especially around the empirical novelty of the underenforcement and overenforcement of the

restrictions and bans on okada riders as examples of regulatory policies, but included several of the codes identified above, contextualized against the policy in question to determine underenforcement or overenforcement. We thus see that latent deductive codes related to the actors, present in the wider service delivery literature (SLBs and SLPEs); manifest deductive codes related to the specific actions of SBLs and SLPEs as they enforced the policies; and latent inductive codes related to regulatory underenforcement and overenforcement.

From this, the decision was taken not to deploy an automated coding process utilizing software but, rather, to employ a manual approach of close reading and note-taking to determine, first, the presence of the latent concepts; and, second, the extent to which the empirical data informed, or contradicted, our expectations around how the enforcement of regulatory measures might differ from the enactment of service delivery measures, via underenforcement and overenforcement.

4 | OKADA BANS AND THEIR ENFORCEMENT

In this section, we analyze our empirical data to explore the enforcement of the okada bans described earlier. Several government officials interviewed for our project insisted that the earlier measures, limiting okadas to certain roads, was a restriction rather than a ban although, as well be seen, in some aspects of enforcement the clarity of this distinction was lost somewhat. In what follows, we first review possible reasons as to why the earlier measures were disregarded, to provide context to the issue of enforcement. We link this with two related but distinct dimensions to variable enforcement of the bans: fluctuations driven by the election cycle and variations arising out of other discretionary motivations. We then analyze our data as we explore the evidence relating to our key theoretical contribution, concerning discretion and the underenforcement and overenforcement of regulatory policies.

4.1 | Okada bans, disengagement, and disregard

As seen above, a key moment in the evolution of okada-related policies was the 2012 Lagos Traffic Law. This was described to us in an interview with okada riders representatives as “one of the most disobeyed law ever by the Lagos state house of Assembly since the introduction of this democracy in 1999 ... Highly controversial.” As for why this might be, a recurring theme from interviews with several informal economy workers and their representatives was that the laws were introduced (“hatched or planned” as one interviewee put it), without consultation with riders and their representative organizations. Riders’ representatives indicated in interview that they felt the government had had no intention of taking their views into consideration in formulating the law. On the other hand, the perception from government officials was that consultation had indeed taken place.

One example of these differing perspectives came before the 2012 Law being introduced. One of the okada riders’ representative organizations attended a public hearing, where a 23-page proposal was presented. By the time the bill was signed into law, it had expanded significantly, roughly by a factor of 3, without the additional content having been presented or discussed. The list of roads from which okadas were banned also included federal roads as well as state roads, which raised questions over the scope of the law and the legitimacy of the State Government legislating on access to Federal roads.

It was, however, clear that workers' organizations were not against regulation per se. One FIWON official made specific reference to International Labour Organisation (2015) and the commitment contained therein, in Section III(11)O, to the "regulated access for use of public space." That said, whilst "there must be some regulatory framework, but we insist that that framework must be inclusive and democratic. Those are the elements that have consistently been missing." Support for regulation over outright bans was also expressed by the vast majority of our survey respondents, as noted earlier.

Further, in interviews the okada riders' representatives were clear that the (pre-2022) law, as imperfect as it was, had to be obeyed. As one leader reported telling the riders: "Even as you're fighting for your rights, fight within the ambit of the law, don't go and begin to destroy government property because you want to air your grievances. The law *sef* ['even the law'] will not be on your side again. The people who are sympathizing with you, they will not sympathize with you again." They also made it clear that if an okada rider was caught by the police on the expressway, for example, where they should not be, the union will not come to help.

Another issue, mentioned in the first workshop, raises a distinct challenge for enforcement—institutional incongruence: "Even if there are regulatory policies on ground, as long as my mind does not go with that policy I will do things my own way." The issue of gaps between laws (as formal institutions) and social and cultural norms (as informal institutions) has been linked to the failure of the ban on street hawking in Lagos (Igudia et al., 2022). The present analysis indicates that it is also a factor relevant to the regulations around okadas.

Another dimension of this is the distrust of authority in Lagos, discussed earlier. There is a history of okada riders being used for political purposes, then abandoning them again. This has manifested itself over time in fluctuating enforcement that broadly follows the electoral cycle. Historical examples are captured in the following quote from the Chairman of the Unity Party of Nigeria, speaking in 2014 (see Agbibo, 2018, p. 11, emphasis in original):

Lagos citizens must remember that this [APC (All Progressives Congress)] party used and dumped *okada* riders after harnessing their support and services in the elections of 1999, 2003, 2007 and 2011. During campaigns for those polls, APC politicians even donated to *okada* riders branded helmets, motorcycles and reflective jackets. But no sooner did the Action Congress of Nigeria [now a part of the APC] come into power than they turned around to bite the finger that fed them, by banning *okada* all over Lagos.

In 2013, the ban was not enforced, not for reasons of an upcoming election, but because the ruling All Progressives Congress (APC)¹⁵ had a membership drive.¹⁶ Enforcement was then eased again before the 2015 elections, in a bid by the APC to remain in power "not minding the debilitating implication to the society."¹⁷ That said, the Secretary to the State Government also argued that the ban was eased temporarily "because we didn't want crisis and violence. We needed to avoid crisis at that time so that political parties would not capitalize on it. The enforcement will be in full force after 3 weeks."¹⁸

One of our interviewees confirmed that the 2015 election saw a repeat of the features seen in the quote from Agbibo (2018). Motorcycles, to be used for okada, were being handed out for "poverty alleviation"; yet, soon after the election, the police started arresting them again: "so the *gra gra* [violent hustling] started." This same interviewee noted, pointedly, that helmets were given out before this election—and within 2 weeks after, riders would be arrested whilst wearing those same helmets. "You know these politicians. When they needed you, that

particular time, they will accept all your demands.” They “are not serious about anything ... they say anything to get our votes, I don’t think these guys care, they just don’t care.”

Before the 2019 election, before Babajide Sanwo-Olu was first elected Governor of Lagos State, we were told in interviews with workers’ representatives that he said “okada hold me by my word, if I eventually become the Governor of Lagos, you people will have the freedom to operate.” Soon after, however, Governor Sanwo-Olu decided to enforce the 2012 law rigorously—and subsequently to impose the outright bans in 2022. We were also told that the attitude of enforcement officers towards riders at that time varied by whether or not the rider was a member of the governing party, the APC. The introduction of the outright bans in 2022 would appear to have brought this “political enforcement cycle” to an end, but in our April 2023 workshop, Ministry officials informed us that “the ban on okada has been effective for a while, but somehow before the election it was watered down a bit.”

This brings us to why the 2022 bans were imposed in only 10 of the 20 LGAs—especially if riding okadas was seen as resulting in serious accidents and facilitating criminality. Discussion with officials in Workshop 2 confirmed that accidents and criminality were factored in, and it is possibly significant for security reasons that the ban also included Ikeja, the location of the State government. That said, it was also made clear to us that another factor was the views of certain voters in certain areas: pressure from local elites was influential. Our interview with riders’ leaders in 2021 suggested that this even influenced pre-2022 policies. Politicians had helped okada riders for political purposes, “after that, the loud middle-class, middle-class element will begin to shout ‘oh, okada is disturbing us, it’s a mess, blah blah blah.’ And so, they want to pander to that too, so there will be some *gra gra*.”¹⁹ In short, the attitudes of politicians to okada riders, over a sustained period of time, has been one of manipulation for political gain. This has been transmitted through enforcement officers, who have been active participants in the uses and abuses of riders, as enforcement of the particular policy in place at any given moment has ebbed and flowed.

Our survey data also confirmed the cyclical nature of enforcement—a clear indication of how visible this was to Lagosians trying to move around by okada. We asked participants to judge the level of enforcement “initially” (when bans and restrictions were first implemented) and “now” (recalling that the survey was conducted in January and February 2022, before the outright bans). On a rising scale of 0–10 for rigor of enforcement, 79.1% judged it initially to be rigorous (6–10); 13.1% judged it as 0–5; the rest responded “don’t know.” For “now” the figures represented a complete reversal: 14.2% (6–10), 65.9% (0–5), and 16% (don’t know). Citizens thus witnessed strong implementation initially, which declined perceptibly over time.

Survey participants identified multiple possible explanations for this. Political manipulation was a widely held view, but many also argued that the law was inconsistent and the government was not serious about enforcement. Some spoke explicitly about police corruption and bribery, although some felt the police took pity on riders just trying to earn some money. In the specific context of political manipulation, *ceteris paribus*, the key factors identified relate partly to underenforcement at certain times, as well as a cycle based on underenforcement then overenforcement. The latter is, however, much more prominent, as discussed next.

4.2 | Discretion, underenforcement, and overenforcement

One interviewee from a government Ministry (in September 2021) argued that “I will expect that every officer of the state, in his own capacity, who is exercising discretion should not do so

at the expense of the common goal. You can exercise discretion, once it will not hurt your target, your goal.” Both the empirical literature reviewed above, and the primary data analyzed below, however, suggest that the notion of the “common goal” is ambiguous, especially in the context of actual policy implementation. Before we look at this in detail, we consider briefly the general challenges faced when trying to regulate okada riders.

One issue is simply the scale of the challenge. One interviewee suggested that, before the bans of 2022, there were perhaps half a million okada riders in Lagos metropolis, serving over 20 million people. These riders, in turn, support others, such as those who repair the motorcycles, as well as street hawkers who sell, for example, food and drink to okada riders. The number of okada riders also grew from 2018 with the introduction of the Gokada ride-hailing app—approved by the Lagos State Government, which offered a way to register and monitor riders. This growth in numbers was accentuated by the money that can be made relative to alternatives (estimated in 2022 to be nearly US\$50 per week per okada rider; Bishop & Courtright, 2022, p. 29). This also attracts significant numbers of migrants from other parts of Nigeria, especially the north.²⁰ A spokesperson for one enforcement agency highlighted this, given also the ease with which they can buy motorcycles and start picking up passengers. In 2022, only just over 10% of okada riders in Lagos were estimated to have had formal training, and fewer than 60% were riding with a licence (Bishop & Courtright, 2022, p. 40).

As noted earlier, okada riding is seen by many as a legitimate way of earning money. Given also youth unemployment in Nigeria running at over 50%, even highly qualified university graduates have been working as okada riders. Okada riding has therefore been a vital source of income for many people in Lagos. In this context, it is perhaps unsurprising that okada riders have disregarded previous restrictions, as described above. How, though, is this reflected on the front line of enforcement, whether of restrictions or outright bans? Data collected in April 2023 via contributions to the second workshop, supported by the researchers' personal observations, suggest that the 2022 bans have been very effective at reducing dramatically the number of okada riders operating in the relevant LGAs. This inevitably raises questions over not just enforcement per se, but the nature of enforcement, given the speed and scale of the removal of so many okadas from the roads of Lagos.

4.3 | Discretion manifesting as underenforcement

In seeking to understand the motives for underenforcement of the earlier restrictions, several insights were offered by Ministry officials in interviews, and by both Ministry officials and enforcement officers in the workshops. One officer spoke of the opposition and aggression they face from citizens when trying to enforce laws. They spoke of the ease with which motorcycles and guns can be bought, and the threat that guns represent to them. This links to the emerging literature around officers exercising discretion when faced with a potentially life-threatening situation. A more banal example given was when, a “few days ago, someone was stopped over ... usage of plate numbers, they just stopped the young man trying to tell him ... fix in your normal plate just for identification, I don't think the [official] did any wrong, the next minute the wife is holding [one of the officials], slapping [him].” Our contributor then asked rhetorically “are these things not really painful to [us]?”

A spokesperson for an enforcement agency highlighted the need for citizens to think more deeply about what patronage of okadas means for the city. They—but other workshop participants as well—made the point that observing the law, being enforcers of the law, “is a job

for every one of us not just the law enforcers only.” This mirrors the earlier observations from okada riders’ representatives regarding the need for riders also to respect the law. Enforcement is more challenging when neither riders nor passengers respect the law in place at any given time. This offers a point of distinction with typical service delivery considerations in the relevant literatures—that enforcement is only required when citizens do not comply with the regulation restricting or banning certain behaviors.

Another important point one enforcement officer made, concerning the practicality of apprehending someone on a motorcycle: “how do you expect us to pick up someone on a bike? When you see policemen trying to stop this bike people, members of the public stand against them at the slightest instance.” One enforcement official noted that okada riders can charge off when they see police officers, even when they have passengers on board. For him, enforcement then becomes a real challenge: they will be hesitant “because danger to me that is arresting and to the person I want to arrest.” Therefore, “because of them most especially sense of humanity we lower our force we want to apply because of the person he or she had carried.” This observation reflects not only the safety of the officer but in this situation also the rider and passenger.

This official also spoke about the limited resources available for enforcement, a factor seen widely in influencing SLB and SLPE behavior: “the government needs to come in, providing tools, equipment, you cannot just imagine like let me say four or five police officers want to arrest a moving okada on the expressway.” He went on to highlight the lack of appropriate (technological) systems such as number plate tracking systems—although he also questioned whether the number plates (even if they were present and visible) would be correct. We thus see enforcement officials concerned for the safety of themselves, passengers, and bystanders, if they try to chase okada riders violating the bans, let alone the dangers they might face if someone is armed.

A feature of the discussion around political cyclicity in enforcement concerned the shifting orders around enforcement being passed down to front-line officers. We also saw this influencing underenforcement. One Ministry official expressed frustration with the “lack of political will to implement and enforce.” As he observed, “the laws are there, where we are [is] not for want of laws but the spirit and intent to implement without sentiments.” An enforcement officer at that same workshop noted that he can do his job correctly in apprehending someone violating a traffic law, but then “the person will place a call through above you,” to someone they know who can overturn the initial arrest. This led to a widespread agreement amongst the stakeholders present (notably, amongst the public officials) that this represents a systemic failure around enforcement and the will to enforce.

This represents a form of corruption, something that others, in the first workshop in particular, made reference to. Corruption is a major source of low levels of trust between police and citizens in Nigeria (Ike et al., 2022). In our workshops, it is something that the enforcement officers present acknowledged existed. We were informed of cases where officers would hand back a motorcycle that had been seized, in return for a bribe. One enforcement officer argued that the one giving the bribe and the one receiving the bribe commit “similar offences.” Meanwhile, one Ministry official wondered whether the enforcement officers had a target for bribes they had to make. In other instances, we were told that officers would sell off motorcycles, or even use them to work as okada riders themselves to supplement their income. Okada riders’ representatives interviewed in 2021 highlighted this abuse: “60% of those [okada riders] you see on the express there, are uniform men. They are army, police, air force and all of them.” This is something that has continued since the bans of 2022 were imposed.²¹ This sort of

discretion has an approximate parallel in the existing literature around service delivery (Cohen, 2018). We thus see corruption driving discretion in the exercise of enforcement.

Finally, we were told in the first workshop that police officers, on occasion, did not stop okada riders from riding in prohibited areas, allowing them instead to operate “at their own mercy.” The okada riders’ representatives also accepted that sometimes officers did this in recognition of the hard times many face, and what these young men might do if their earning opportunities with okadas are taken away. This highlights a paradox in the debate around the okada ban. One argument for the ban is the suggestion that okada riding is abused by criminals, yet the loss of legitimate earning opportunities from okada riding might lead at least some of these young men into criminality. From this, it is not clear that these examples of underenforcement represent the entrepreneurial discretion of SLPEs, or simply the sort of discretion exercised when faced with practical constraints. Only in the last instance is there an expression of underenforcement of regulatory measures that comes close to the flexibility in enforcement of service delivery measures. As suggested above and demonstrated below, with regulatory policies such as those studied herein, SLPEs are much more likely to exercise discretion such that it manifests as overenforcement. We consider this in detail next.

4.4 | Discretion manifesting as overenforcement

Several interviews, but especially those with informal economy workers and their leaders, revealed examples and mechanisms by which overenforcement manifested itself. We were told in one interview with workers’ representatives about groups of officials even entering private properties late at night to confiscate motorcycles, accompanied by others who were not in uniform and whose identity was unknown. There was no suggestion that the owners had previously been seen riding their okada on one of the roads from which they were banned under the 2012 legislation. On this point also, okada riders could still use the remaining 9000 or so roads at this time, notably the inner roads (what some interviewees referred to as the “inner inner,” deep within neighborhoods away from main roads). That said, several interviewees confirmed that enforcement officers would arrest okada riders within the “inner inner” where the law permitted them to be.

Sometimes the officers would then claim, falsely, to have arrested the rider out on the highway. It was even suggested that this behavior led to okada riders staying away from the inner roads, and staying out on the highways where they were banned but where, ironically, they felt safer from harassment. That said, we were given evidence that sometimes the okada taskforce had brought in riders and their motorcycles, only for a senior officer to overturn their arrest and require the motorcycle to be returned, precisely because the arresting officers had gone outside the law by making the arrest in the “inner inner.” The okada riders’ representatives had supported riders in this situation, as a result of which the taskforce officers “have come to realize that. It doesn’t pay them again. [They] don’t have option except to comply with the directive of [a senior officer]. So, they don’t come inside to disturb them like before again.”

On the question of criminality and okada riding, following the introduction of the 2012 Law, the okada riders’ representatives told us about a case they brought against the government, regarding their right to impose bans on riders using federal roads. They reported to us that the judge made it clear that it was the duty of the authorities to identify and apprehend criminals, “not to classify everybody on a bike as a criminal.” After the court case,

we were also informed that the police were told to tone down the way in which they arrested okada riders, with the Police Commissioner being told to ensure that when arresting okada riders, officers were to avoid committing violent acts with sticks and guns. As a footnote to this, in this same interview the participants said that they had heard just that morning (September 2021) of a riot at the expressway, where a policeman had allegedly killed an okada rider, “in the course of enforcing the law.” Such circumstances reaffirm the vital need to understand the negative exercise of discretion when considering how regulatory policies are enforced.

We noted above that enforcement officers were working as okada riders to supplement their income. Workshop participants reported that this activity included operating on the expressways that were part of the routes banned since 2012 on safety grounds. One participant put it bluntly: “is that the main reason why they (the Lagos State government) discouraged citizens from commercial okada riding ... to increase the income of police officers who have taken over?” The work of Cohen (2018) indicates that this sort of behavior is not unheard of with service-delivery activities, but is particularly problematic when this exercise of discretion directly breaks the law that these officers are supposed to be enforcing. The representatives of the enforcement agency present in the workshop did emphasize the criminal nature of this activity, and that citizens should “report any such case they come in contact with, with the promise of swift action to curb such unprofessional conduct by officers to check-mate them.” It is hard to imagine this happening, however, when citizens have such little trust in the authorities and the impunity with which they see these officers riding okadas.

To conclude this section, we return to the point made by many participants in our research that a meaningful and nondiscriminatory solution to the challenges faced by Lagosians is needed. Otherwise, to use the dramatic image expressed by one representative, “things will deteriorate in a chaotic and disorganized manner with **jack boot enforcement** of policies.”

5 | DISCUSSION OF FINDINGS

Before we reflect on our principal findings, we first recap briefly the main conceptual foundations and proposed novelties of the foregoing analysis. Policy entrepreneurs are those who, operating at the start of the policy process, propose policy solutions to perceived problems. As noted earlier, “policy entrepreneurs are identifiable primarily by the actions they take rather than the positions they hold” (Cohen, 2021, p. 18). This is a useful observation because research on SLBs focuses on what *they* are able to do when they exercise discretion in implementing policy—a situation arising specifically out of the positions they hold, at the interface of authority and citizens. Moreover, they may well choose to exercise discretion because, in their professional view, the policy *is* the problem.

SLPEs both implement and influence policy, as discussed earlier. The distinction between SLBs and SLPEs has been identified as being shaped by individuals' scope and activity: “While street-level bureaucrats aim to shape implementation of a policy already in place, policy entrepreneurs focus on the design of that policy” (Cohen, 2021, p. 20). The SLPE literature, however, generally falls into two camps—studies that take a broader view, seeing SLBs acting as PEs through the ways in which they implement policy; and studies that take a narrower perspective, seeing SLBs acting as PEs only when they influence policy design (see above for supporting citations).

Even this, however, does not necessarily overcome the potential confusion. The second literature implies only Kingdonian policy entrepreneurship is considered as street-level policy

entrepreneurship by SLBs. In the context of policy as written versus performed, or policy as designed versus implemented, it could be argued that exercising discretion in the performance or implementation changes the policy, *de facto* if not *de jure* (only the latter conforming with a Kingdonian understanding). Below, we reflect on the extent to which the foregoing data analysis offers insights into the presence of each of these understandings of street-level policy entrepreneurship, noting that a detailed exploration of the conceptual underpinnings to this distinction is beyond the scope of the present paper.

The novel conceptual contributions this research offers are twofold. First, we draw an explicit distinction between two types of policy, service delivery and regulation, the latter referring to the enforcement of restrictions or bans on proscribed behavior; a distinction we then place at the center of the analysis. Second, we then draw a further distinction between the underenforcement and overenforcement of regulatory policies. Reflecting on the existing literature reviewed above, it is straightforward to see how this latter distinction could equally be applied to the service delivery-type policy (health, etc.) that tends to dominate the literature. That said, below we reflect on how our empirical findings relate to, for example, current understandings of the motivations for SLB discretion. In this, we shall see a distinction drawn between underenforcement and overenforcement as applied to service delivery versus regulatory policies.

The literature on SLBs identifies multiple motives for why SLBs exercise discretion. In general, we found little evidence of policy alienation. We found only some evidence of role conflicts as they manifested in underenforcement, motivated by concerns for the safety of rider and passenger should they pursue an okada rider. This lack of a fundamental relationship with policy and the policy process is perhaps unsurprising. First, “a military character was stamped on the police at inception by the British colonialists” (Agbibo, 2015, p. 260). Subsequently, “this military character inherited at independence in 1960 was strengthened by successive military regimes and up till today remains one of the greatest undoing of the Nigerian Police” (Agbibo, 2015, p. 261). The militarization of the police (and other enforcement agencies) can, at the very least, start to help us to understand their attitude toward orders. This will distance them from the policy itself, with only limited evidence of discretion exercised in underenforcement being found, except where driven from above in the context of political enforcement cycles.

In terms of organizational motivations for discretion, the only clear supporting evidence we found was a reference to limited resources when trying to arrest okada riders working in prohibited areas. It is therefore significant that whilst some of the evidence for overenforcement involved violence in stopping riders who were working, other actions included taking motorcycles during the night when not being ridden, regardless of whether or not they were to be used legally. As for personal factors driving discretion, most of the examples discussed in the literature review reflect what can be defined broadly as “positive” traits in exercising discretion. Here again, the militarization of enforcement agencies might play a role in attracting and developing a certain mindset in individuals, as reflected in the work of, *inter alia*, Agbibo (2015) and Ike et al. (2022), which can reasonably be cast as “negative” in the ways in which overenforcement in particular is seen in our data.

Turning to the activities of front-line workers as SLPEs, we first recall that not only are there two distinct interpretations of this concept in the literature but also that it remains debatable as to whether SLPE activity can only be identified as being consistent with Kingdonian policy entrepreneurship, if the exercise of discretion results in a *de facto* change in the policy being enforced. The political enforcement cycle is driven primarily by those high up

in the organizational structures, including the political leaders who sit above the enforcement agencies. There is clearly scope for discretion to be exercised by officers, as we see with the evidence of both underenforcement and overenforcement. In the context of political enforcement cycles, however, the conduct of enforcement officers fits more clearly with the mindset of following orders, enforcing laws, and thus being seen to uphold the rule of law.

With underenforcement, we found evidence of multiple motivations influencing enforcement officers' exercise of discretion. These included concern for their own safety and also for the safety of the riders and especially their passengers motivated by their "sense of humanity," when officers saw okadas on roads where they should not be. Partly related to this was concern over the lack of resources—a driver of street-level discretion seen widely in the literature. In this instance, a lot of resources would be needed to apprehend safely an okada rider on the move.

Another factor for underenforcement was corruption. This could manifest itself as the bribing of officers, but one earlier example saw someone who had been arrested then calling a superior officer, who told the arresting officers to let the person go. This example offers an interesting inversion of the usual relationship between street-level officers and their organization, arising from this being a regulatory rather than a service delivery measure. Rather than an SLB or SLPE exercising discretion because of concern over the law, they enforced the law (in an appropriate manner) only to be told, in effect, to ignore the law by a superior in the organization. Finally, there was also evidence of discretion being exercised that reflected its more common expression in favor of citizens or clients—where enforcement was held back out of pity for the economic circumstances of the riders. Again, however, this represents an inversion of the usual manifestation of this type of behavior, with the underenforcement of a regulatory policy, rather than an SLB or SLPE finding ways to ensure full compliance with the objective of an imperfect service delivery policy that could otherwise be underdelivered.

Overenforcement of the measures introduced to control okadas has manifested itself in various ways. This has seen the use of violence against riders, even leading to the death of some. It has also seen motorcycles being taken from inside private properties. Officers acquiring motorcycles in this and other ways has resulted in some being crushed, others sold, and others ridden as okadas by enforcement officers. On other occasions before the 2022 bans, riders were arrested when riding on roads where they were allowed to operate, only for the officers to claim that the riders were caught on one of the outlawed roads.

Evidence also demonstrated some of the excess by street-level officers was corrected by senior officers, but the scale of corruption and lack of trust in the authorities, indicated earlier, is likely to mean that these occurrences are relatively few and far between. It is the implied impunity that helps to ensure officers continue to behave in this manner. One possible factor here is that enforcement officers and their work have been politicized, empowering them to behave in ways that exceed what is required for the enforcement of okada bans, even exceeding the boundaries of the law with the violence used.

One of the factors influencing this has been the creation of a narrative appealing to Lagosians' concerns over criminality—even though Lagos remains one of the safest states in Nigeria. This narrative, exploited by politicians, parts of the media, and enforcement agencies, has included increasing use of reference to the influx of migrants into Lagos, especially from the north of Nigeria. The facts of this were noted earlier, but the language used is more reflective of ethnic differences. These Nigerians are seen as immigrants, illiterate in Yoruba, English, or Pidgin English, the principal languages used by locals. Second, and linked to the

foregoing, insecurity has been a major concern in Nigeria for over a decade, exacerbated during and post-COVID-19, with kidnappings and banditry becoming widespread in many states, but especially in the north. Labeling okada riders as criminals, politicians are able to show themselves to be tough on crime. Tensions have been magnified because bans have been “regarded by riders as police money-making operations” (Bishop & Courtright, 2022, p. 42). This represents a specific case of moral inversion, where force is being justified to contain the violence and criminality that okada riders are accused of having brought to Lagos—the so-called “could-be terrorists” (Agbiboa, 2022) mentioned earlier. As one okada representative put it, “They will always like to find excuse to give the impression that you are the bad person, and they are the good one. They have the money, the media is with them.”

6 | CONCLUSIONS

The foregoing provides plenty of evidence of SLPE activity as defined by the first literature presented above. There is no direct evidence of Kingdonian policy entrepreneurship in terms of changes to policy design. That said, the unresolved debate within the SLPE literature requires further consideration, regarding the distinction between *de facto* versus *de jure* policy (re) design. The exercise of discretion changes something, unquestionably. In much of the SLB literature in particular, this could be the *de facto* improvement of a poorly designed policy, or a poorly resourced policy, each of which could impair effective delivery of the policy as designed or written. This is an issue for future research.

With a focus on regulatory policies, discretion is manifested through either under-enforcement or overenforcement. Underenforcement of our particular set of regulatory policies is shaped by multiple factors, only some of which have resonance with the established literature analyzing service delivery policies. That said, some factors have arisen from the organizational context in which enforcement officers work, rather than resulting from their own discretion. Overenforcement has been seen in multiple ways, with only limited evidence of this being opposed or stopped by superior officers—even when the activities of enforcement officers exceeded not just the policies around okadas, but the wider legal context, with what amounts to the theft of motorcycles from private properties, through to extreme violence and even the death of riders. This egregious manifestation of discretion again arises out of our focus on regulatory policies rather than service delivery.

The prevalence of moral inversion, for example, in the context of antiokada rider narratives, suggests that overenforcement is part of a deliberate act of presenting these actions as necessary and therefore entirely consistent with the policies. What is not clear is whether enforcing the policies in this way is also upholding the rule of law in Lagos. The law has not literally been rewritten, but there appears to be an ongoing *de facto* rewriting of the measures, insofar as overenforcement represents an excess of force over what is actually required to deliver on the letter of the law. Another area for future research is to explore the significance and prevalence of the distinction between service delivery and regulatory policies within the scope of SLB and SLPE activities and the extent to which underenforcement and overenforcement are seen more widely as both being features of the work of SLBs and SLPEs. Finally, although the enforcement of the okada ban has been emphatic, in applying the notions of underenforcement and overenforcement to regulatory implementation, future research could explore the potential impact of utilizing the regulated activity on enforcement officers' decision making (before the ban, many officials will have used okadas as part of their daily commute).

In the April 2023 workshop, one participant looked to a more positive future policy by noting that “an inclusive policy should be humane and practicable, enough of the draconian policies, enough of the ways these policies are implemented.” We conclude, however, with a final thought that comes from one of the participants in the government break-out group at the July 2022 workshop. We hope he is wrong:

There are some people in this country who have that sense of entitlement, so our reactions to laws, our responses to laws actually varies, there are some people from some part of this country who can easily abide but some will tell you that he no fit, this is our country, this is how [we] will want it. ***So until we find a common ground which have been missing in policy implementation, we will still be sitting round like this and eventually all this report may just be good for the journals alone.***

ACKNOWLEDGMENTS

We gratefully acknowledge the financial support of the British Academy, Humanities and Social Sciences Tackling Global Challenges Scheme, Project TGC/200070. We owe a great debt of gratitude to our Research Assistants, Abimbola Thomas, and Samuel Okeke, and to the undergraduate students who helped greatly with the survey and with the workshops. We appreciate the contributions of the government officials, the representatives of the Federation of Informal Workers Organization of Nigeria, okada riders and street traders, as well as residents of Lagos, for making an invaluable contribution to this research. We thank participants at the Conference on Public Process Research held at the University of Colorado, Denver, on January 12–14, 2023, for their insightful comments. Finally, we are extremely grateful to the reviewers and editors of *European Policy Analysis*, for their insightful and constructively critical comments on earlier versions of this paper. The usual disclaimer applies.

CONFLICT OF INTEREST STATEMENT

The authors declare no conflicts of interest.

ORCID

Rob Ackrill  <http://orcid.org/0000-0002-0739-1812>

Eghosa Igudia  <http://orcid.org/0000-0002-2566-3199>

Olasunmbo Olusanya  <http://orcid.org/0000-0003-2518-3846>

Basirat Oyalowo  <http://orcid.org/0000-0003-4003-0602>

TWITTER

Eghosa Igudia  @EOIgudia

ENDNOTES

- ¹ Both papers have the same three authors.
- ² These different approaches to classifying personality characteristics are also likely to have been influenced by the different methods of data analysis adopted—quantitative and qualitative, respectively.
- ³ A third case study in this paper analyses the My Lai massacre perpetrated during the Vietnam War. It is perhaps telling that the two police-related cases are analyzed alongside what we might now call a war crime.

- ⁴ See: <https://www.stears.co/article/the-implications-of-the-lagos-okada-ban/> (last accessed February 3, 2023).
- ⁵ See: <https://businessday.ng/uncategorized/article/lagos-commuters-lose-75-of-weekly-working-hours-to-traffic/> (last accessed 24 July 2023).
- ⁶ See: <https://www.vanguardngr.com/2023/06/mother-of-all-traffic-motorists-spend-7-h-in-lagos-ibadan-expressway-gridlock/#:~:text=June%2025%2C%202023-,Mother%20of%20all%20traffic%3A%20Motorists%20spend%20seven,in%20Lagos%20Ibadan%20Expressway%20gridlock&text=Lagos%20Ibadan%20Expressway%20traffic%20is,to%20serve%20the%20next%20vehicle> (last accessed July 24, 2023).
- ⁷ What follows draws from a number of media sources (all last accessed February 3, 2023), notably: The Umpteenth Ban on Okada in Lagos (2022?): <https://www.thisdaylive.com/index.php/2021/08/17/the-umpteenth-ban-on-okada-in-lagos/>; The Implications of the Lagos Okada Ban (2020): <https://www.stears.co/article/the-implications-of-the-lagos-okada-ban/>; Reviving the Lagos Okada Ban (2015): <https://hallmarknews.com/reviving-the-lagos-okada-ban/>; The elixir, politics, and the risk of Okada resurgence in Lagos (2014): <https://www.thenicheng.com/the-elixir-politics-and-the-risk-of-okada-resurgence-in-lagos/>; Insecurity: Lagos seeks total ban of Okada (2016): <https://www.vanguardngr.com/2016/03/insecurity-lagos-seeks-total-ban-of-okada/>.
- ⁸ Note also that fares for these routes carried a premium.
- ⁹ See, inter alia, “The Implications of the Lagos Okada Ban” article.
- ¹⁰ See “The Umpteenth Ban on Okada in Lagos” article.
- ¹¹ See “The Umpteenth Ban on Okada in Lagos” article.
- ¹² The questionnaires for the okada riders and general citizens are provided in an online appendix. It should be noted that a third questionnaire was distributed to street hawkers as part of the wider project. That aspect of the project plays no role in the current analysis.
- ¹³ Favorable ethical opinions for this project were received from both de Montfort University, UK and University of Lagos, Nigeria. All of the student research assistants were trained in the ethical aspects of the research undertaken, including how to ensure informed consent and voluntary participation were respected when recruiting participants for the survey.
- ¹⁴ Workshop 1: 17 government officials (including security services); eight FIWON officials; five okada riders; three street hawkers; eight citizens; nine researchers. Workshop 2: 20 government officials (including security services); eight FIWON officials; five okada riders; four street hawkers; eight citizens; seven researchers; three journalists (who participated in the workshop). There were also online and TV media present to record the event and interview the organizers.
- ¹⁵ The APC was created in 2013 from the merger of three political parties. It or its constituent parties have governed Lagos for the majority of the period since 1999 and the end of military rule in Nigeria.
- ¹⁶ See “The elixir, politics” article.
- ¹⁷ See the “Reviving the Lagos Okada Ban” article.
- ¹⁸ See the “Reviving the Lagos Okada Ban” article.
- ¹⁹ Interestingly, in the context of the present study, as well as “violent hustling” (see above), “gra gra” can also be understood to mean overacting, which suggests a link to overenforcement.
- ²⁰ Of 585 okada riders surveyed across Lagos for this research, 277 came from the North East (98), North West (82), and North Central (97) regions of Nigeria.
- ²¹ See: <https://www.thecable.ng/investigation-how-security-operatives-violate-okada-ban-fleece-commuters-in-lagos>.

REFERENCES

- Ackrill, R., & Kay, A. (2011). Multiple streams in EU policy-making: The case of the 2005 sugar reform. *Journal of European Public Policy*, 18, 72–89.
- Agbiboa, D. E. (2015). Protectors or predators? The embedded problem of police corruption and deviance in Nigeria. *Administration & Society*, 47, 244–281.
- Agbiboa, D. E. (2018). Conflict analysis in ‘World Class’ cities: Urban renewal, informal transport workers, and legal disputes in Lagos. *Urban Forum*, 29, 1–18.
- Agbiboa, D. E. (2020a). Between cooperation and conflict: The national union of road transport workers in Lagos, Nigeria. *Crime, Law, and Social Change*, 73, 605–622.
- Agbiboa, D. E. (2020b). How informal transport systems drive African cities. *Current History*, 119, 175–181.
- Agbiboa, D. E. (2022). The checkpoint state. *Public Culture*, 34, 123–146.
- Arnold, G. (2015). Street-level policy entrepreneurship. *Public Management Review*, 17, 307–327.
- Arnold, G. (2021). Does entrepreneurship work? Understanding what policy entrepreneurs do and whether it matters. *Policy Studies Journal*, 49, 968–991.
- Bishop, T., & Courtright, T. (2022). *The wheels of change: Safe and sustainable motorcycles in sub-Saharan Africa*. FIA Foundation. <https://www.fiafoundation.org/resources/the-wheels-of-change-safe-and-sustainable-motorcycles-in-sub-saharan-africa>
- Brockmann, J. (2017). Unbureaucratic behavior among street-level bureaucrats: The case of the German State Police. *Review of Public Personnel Administration*, 37, 430–451.
- Brodkin, E. Z. (2011). Policy work: Street-level organizations under new managerialism. *Journal of Public Administration Research and Theory*, 21, i253–i277.
- Brodkin, E. Z. (2012). Reflections on street-level bureaucracy: Past, present, and future. *Public Administration Review*, 72, 940–949.
- Cairney, P. (2018). Three habits of successful policy entrepreneurs. *Policy & Politics*, 46, 199–215.
- Cairney, P. (2020). *Understanding public policy: Theories and issues* (2nd ed.). Red Globe.
- Capano, G., & Galanti, M. T. (2021). From policy entrepreneurs to policy entrepreneurship: Actors and actions in public policy innovation. *Policy & Politics*, 49, 321–342.
- Cohen, G. (2023). “We’re Not the Cure, We’re Just the Band-Aid”: The interplay of structure, culture, and practice in police service provision to persons with mental illnesses. *The American Review of Public Administration*, 53, 99–114.
- Cohen, G., & Cohen, N. (2023). Understanding street-level bureaucrats’ informal collaboration: Evidence from police officers across the jurisdictional divide. *Public Management Review*, 25, 224–242.
- Cohen, N. (2018). How culture affects street-level bureaucrats’ bending the rules in the context of informal payments for health care: The Israeli case. *The American Review of Public Administration*, 48, 175–187.
- Cohen, N. (2021). *Policy entrepreneurship at the street level*. Cambridge University Press.
- Cohen, N. (2022). An exploratory examination of the relationship between trust and street-level bureaucrats’ willingness to risk their lives for others. *The American Review of Public Administration*, 52, 221–234.
- Cohen, N., & Aviram, N. F. (2021). Street-level bureaucrats and policy entrepreneurship: When implementers challenge policy design. *Public Administration*, 99, 427–438.
- Cohen, N., & Golan-Nadir, N. (2020). Why do street-level bureaucrats risk themselves for others? The case of Israeli police officers. *Australian Journal of Public Administration*, 79, 480–494.
- Cohen, N., & Klenk, T. (2019). Policy re-design from the street level. In P. Hupe (Ed.), *Research handbook on street-level bureaucracy: The ground floor of government in context* (pp. 209–222). Edward Elgar.
- Durose, C. (2007). Beyond ‘street level bureaucrats’: Re-interpreting the role of front line public sector workers. *Critical Policy Studies*, 1, 217–234.
- Emiogun, F., Faduyile, F., Soyemi, S., & Oyewole, O. (2016). Motorcycle accident mortality in Lagos, Nigeria: Impact of a traffic law. *African Journal of Trauma*, 5, 43–47.
- Frisch Aviram, N., Cohen, N., & Beeri, I. (2020a). Wind(ow) of change: A systematic review of policy entrepreneurship characteristics and strategies. *Policy Studies Journal*, 48, 612–644.
- Frisch Aviram, N., Cohen, N., & Beeri, I. (2020b). Policy entrepreneurship in developing countries: A systematic review of the literature. *Public Administration and Development*, 40, 35–48.

- Igudia, E., Ackrill, R., & Machokoto, M. (2022). Institutional incongruence, the everyday, and the persistence of street vending in Lagos: A demand-side perspective. *Environment and Planning A: Economy and Space*, 54, 1256–1276.
- Ike, T. J., Singh, D., Jidong, D. E., Ike, L. M., & Ayobi, E. E. (2022). Public perspectives of interventions aimed at building confidence in the Nigerian police: A systematic review. *Journal of Policing, Intelligence and Counter Terrorism*, 17, 95–116.
- International Labour Organisation. (2015). *International Labour Conference Recommendation 204, concerning the transition from the informal to the formal economy*. https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R204
- Kingdon, J. W. (2003). *Agendas, alternatives, and public policies* (2nd ed.). Addison-Wesley.
- Koven, S. G. (2023). Administrative evil and street level discretion. *Public Organization Review*. <https://link.springer.com/article/10.1007/s11115-023-00725-1>
- Lahat, L., Klenk, T., & Pitowsky-Nave, N. (2023). Street-level bureaucrats as policy entrepreneurs and collaborators: Findings from Israel and Germany. *European Policy Analysis*. <https://onlinelibrary.wiley.com/doi/pdf/10.1002/epa2.1173>
- Lipsky, M. (1980). *Street-level bureaucracy: Dilemmas of the individual in public services*. Russell Sage Foundation.
- Lipsky, M. (2010). *Street-level bureaucracy: Dilemmas of the individual in public services* (30th anniversary expanded ed.). Russell Sage Foundation.
- Lotta, G., Nieto-Morales, F., & Peeters, R. (2023). “Nobody wants to be a dead hero”: Coping with precarity at the frontlines of the Brazilian and Mexican pandemic response. *Public Administration and Development*, 43, 232–244.
- Mintrom, M. (2020). *Policy entrepreneurs and dynamic change*. Cambridge University Press.
- Olajide, O., & Lawanson, T. (2022). Urban paradox and the rise of the neoliberal city: Case study of Lagos, Nigeria. *Urban Studies*, 59, 1763–1781.
- Oluranti, O. I. (2011). Informal self-employment and poverty alleviation: Empirical evidence from motorcycle taxi riders in Nigeria. *International Journal of Economics and Finance*, 3, 176–185.
- Petchey, R., Williams, J., & Carter, Y. H. (2008). From street-level bureaucrats to street-level policy entrepreneurs: Central policy and local action in Lottery-Funded community cancer care. *Social Policy & Administration*, 42, 59–76.
- Petridou, E., & Mintrom, M. (2021). A research agenda for the study of policy entrepreneurs. *Policy Studies Journal*, 49, 943–967.
- Pressman, J., & Wildavsky, A. (1973). *Implementation*. University of California Press.
- Sanusi, A. A., & Emmelin, M. (2015). Commercial motorcycle drivers' perceptions of risk and road safety in urban Nigeria: An explorative study. *International journal of injury control and safety promotion*, 22, 328–339.
- Sidha, Z., Asingo, P., & Magutu, J. (2021). Street-level bureaucrats as policy entrepreneurs: The nexus between timing of traffic enforcement activities and road safety policy outcomes. *Politics & Policy*, 49, 186–204.
- Surulere, M. O., & Campbell, P. C. (2020). Comparative study of road traffic accidents caused by motorcycles before and after the Lagos state new traffic laws. *Yenagoa Medical Journal*, 2, 28–37.
- Tummers, L., Bekkers, V., & Steijn, B. (2009). Policy alienation of public professionals: Application in a new public management context. *Public Management Review*, 11, 685–706.
- Tummers, L., Steijn, B., & Bekkers, V. (2012). Explaining the willingness of public professionals to implement public policies: Content, context and personality characteristics. *Public Administration*, 90, 716–736.
- Uwazuruike, A. (2020). #EndSARS: The movement against police brutality in Nigeria. *Harvard Human Rights Journal*, 33. <https://journals.law.harvard.edu/hrj/2020/11/endsars-the-movement-against-police-brutality-in-nigeria/>
- Venkatraman, C., Kim, H., Idowu, A., Idris, J., Hynan, L., Kim, D., & Nwariaku, F. E. (2019). When policy meets the pedal: A reduction in motorcyclist fatalities following the implementation of a road traffic law in Lagos, Nigeria. *Traffic injury prevention*, 20, 849–853.
- Wright, II J. E., Gaozhao, D., & Snow, M. A. (2021). Place plus race effects in bureaucratic discretionary power: An analysis of residential segregation and police stop decisions. *Public Performance & Management Review*, 44, 352–377.

AUTHOR BIOGRAPHIES



Rob Ackrill is a professor of economics and policy at Nottingham Business School, Nottingham Trent University, where he leads the Center for Economics, Policy and Public Management. His research draws on theories of policy and governance to explore the dynamics and drivers of real-world policies.



Dr Eghosa Igudia teaches macroeconomics at De Montfort University, Leicester, UK. His main research interest is the informal economy and its broad intersection with inclusive policy, migration, poverty reduction, and inclusive growth. He is also interested in inflation and unemployment, renewable energy, debt, and financial literacy.



Olasunmbo Olusanya is a senior lecturer in the Department of Employment Relations and Human Resource Management, University of Lagos, Nigeria. She is an employment relations, HRM, and a design thinking specialist with focus on employment in the informal economy, entrepreneurship, labour economics, and development studies in pursuit of sustainable livelihood for working people.



Basirat Oyalowo specializes in real estate sustainability, informality, and housing studies, with interest in comparative African studies, transdisciplinary research, and mixed-methods research. She is the Lagos housing domain lead researcher for the African Cities Research Consortium, an FCDO-funded project led by the University of Manchester. She is on the leadership board of the Global Alliance for Inter and Transdisciplinarity and a founding member of the Centre for Housing and Sustainable Development at the University of Lagos, Nigeria. Basirat is a senior lecturer in the Estate Management Department of the University of Lagos.

SUPPORTING INFORMATION

Additional supporting information can be found online in the Supporting Information section at the end of this article.

How to cite this article: Ackrill, R., Igudia, E., Olusanya, O., & Oyalowo, B. (2023). Street level bureaucrats, policy entrepreneurship, and discretion in enforcing bans on motorcycle taxis in Lagos, Nigeria. *European Policy Analysis*, 9, 440–464. <https://doi.org/10.1002/epa2.1196>