

**EVALUATION OF TURNING UP THE PRESSURE: Tackling money-laundering
through multi-stakeholder approaches in ECOWAS countries
Final report**

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LIST OF ACRONYMS

AML - Anti-money laundering

CENOZO - Cell Norbert Zongo for Investigative Journalism in West Africa

DFID - Department for International Development

DNFBP - Designated Non-Financial Business and Professions

ECOWAS - Economic Community of West African States

EU - European Union

FIU - Financial Intelligence Unit

GIABA - Inter-Governmental Action Group against Money Laundering in West Africa

ICIJ - International Consortium of Investigative Journalists

IMPACT - Integrity, Mobilisation, Participation, Accountability, Anti-Corruption and Transparency

MEL - Monitoring Evaluation and Learning

OCCRP - Organized Crime and Corruption Reporting Project

NC - National Chapters

TI-S - Transparency International Secretariat

SAMWA - Strengthening Anti-money Laundering capacities in West Africa

STR - Suspicious transaction report

EXECUTIVE SUMMARY

The primary purpose of this evaluation is summative: to assess the achievements and results, strengths and weaknesses of the European Union-funded project “Turning up the Pressure: Tackling money-laundering through multi-stakeholder approaches in ECOWAS countries”. The project took place in 7 West African countries (Ghana, Nigeria, Senegal, Guinea, Liberia, Sierra Leone and Côte d’Ivoire) over a period of 2 years.

The evaluation used two main methods for collecting data and information: document analysis and remote interviews with internal and external stakeholders, with a total of 19 people as below:

TI-S	National Chapters/contact organisations	Beneficiaries	Allies
2	8	6	3

The project’s Overall Objective was to “increase public awareness for and political commitment to anti-money laundering and anti-corruption mechanisms which effectively prevent, detect, report and sanction the laundering of corrupt and criminal proceeds in practice in ECOWAS countries”.¹

The project had 4 specific objectives:

Objectives
O1: Existing anti-money laundering and anti-corruption commitments and recommendations for ECOWAS countries are compiled on a publicly available platform, which allows for civil society and media monitoring.
O2: Media coverage by investigative/business journalists of corruption and money-laundering cases in ECOWAS countries regularly refers to the need for effective implementation of existing anti-money laundering recommendations and commitments.
O3 - Increased structured engagement on anti-money laundering and anti-corruption between private sector, law enforcement, elected officials, media and civil society leads to greater public, expert and practitioner awareness of priority actions needed and the path ahead to their implementation.
O4 - Regular public monitoring and progress reporting increases public, expert and private sector pressure for the effective implementation of existing priority anti-money laundering commitments and recommendations in ECOWAS countries.

RELEVANCE

The project was important and relevant in the wider context of the fight against corruption in ECOWAS.² Money laundering remain an underreported and not widely understood by the general public in West Africa while it is in fact key in the fight against corruption.

The project added value on several levels, as little had been done by CSOs on AML specifically. As a result of research carried out in the course of the project, new information previously unavailable to government institutions such as FIUs came to light³, new networks and partnerships were set up with public and private sectors. All 7 NCs and contact organisations have now common knowledge on AML as well as the ability to seek funding for AML projects – while some

¹ Amendment Annex A.2.

² Interviews with TI-S and NCs, May 2020.

³ Interview with journalist, 23 May 2020.

of them are recognized as leaders on AML in their countries.⁴ Through the support of the project, TI was able to attend and influence high-level meetings with the Inter-Governmental Action Group against Money Laundering in West Africa (GIABA) and the Egmont Group.

Participating NCs had mixed prior interests and experiences on AML. There is broad agreement - including by GIABA and Financial Intelligence Units (FIUs) - that having a multi-stakeholder approach on AML was an innovative as well as successful approach.⁵

This project did turn up the pressure – although not following the sequencing of the theory of change.

OUTCOMES/IMPACT

The project achieved the expected impact of contributing to increase public awareness for and political commitment to anti-money laundering and anti-corruption mechanisms in the targeted countries.⁶

Hundreds of people – including a significant number of journalists – participated in trainings or workshops which expanded their understanding of AML. Many outputs were produced – reports, papers, brochures, blogs, videos, a comic book, plays, radio and TV programs to make AML an accessible concept to the general public. NCs used concrete examples to explain money laundering and relate it to their daily lives. Ground-breaking research was conducted by some NCs, notably on real estate in Guinea and on vulnerable sectors vulnerable to money laundering in Côte d’Ivoire.⁷ As for increased political commitment, there were clear instances of ‘turning up the pressure’ as in Guinea, where following a TV show on AML, the Prime Minister asked the Minister of Justice to make progress on AML cases.⁸ The NC in Nigeria obtained that the Central Bank reports on number of suspicious transaction reports (STR) per year. This is a positive development as it increases scrutiny – questions can now be asked as to the number of investigations resulting from the STRs.⁹

Some of the expected outcomes were achieved quickly (O2, O3). For the first time, and as a result of this project, there is now a partnership between CSO, media and institutions/FIUs on AML in some countries.¹⁰ Developing networks regionally and between NCs was also a success.¹¹

Nonetheless, some outcomes are below expectations, in particular O1 which was late, misses one key country (Senegal) and is viewed as a missed opportunity.

This project scored gains on behaviour change and policy and institutional changes.

EFFECTIVENESS

It can be challenging to track progress and see the degree to which outputs and activities were achieved at NCs and TI-S levels in relation to the initial targets because NCs did not use the same format for their workplans, and often left out baselines, targets and outcomes. The final report by TI-S for the project is currently not available, which complicates the tracking. A lot has been done and it is important to record it.

⁴ Interviews with TI-S and NCs, May 2020.

⁵ Interview with NC, 25 May 2020.

⁶ Amendment Annex A.2. Interview with TI-S, 21 May 2020.

⁷ Social Justice: <https://socialjustice-ci.net/public/publications/fichiers/1577802143.pdf>

⁸ Interview with FIU, 28 May 2020.

⁹ Interview with NC, 20 May 2020.

¹⁰ Interview with TI-S and FIU, 28 May 2020.

¹¹ Interviews with NCs, May 2020.

The focus on technology tools such as the tracker was a risky approach in the context of West Africa and was not particularly successful. Of note as a successful approach was working early and closely with FIUs – including for the development of the NCs workplan. Research projects were deemed very useful, including by FIUs.

The challenges as seen by NCs and TI-S were varied; it included lack of resources for some NCs,¹² staffing issues (delays in recruitment at TI level; staff turnover in one NC; lack of funds to recruit new staff in NCs; challenge of recruiting expert and consultants for NCs), the short length of the project, the time consuming issue for TI-S of translating everything in both English and French, the differences between NCs’ needs and the requirement of collecting data for the portal and the tracker.

The timeline for some outputs proved unrealistic as they turned out to be more time consuming than expected (the tracker, the survey), or didn’t really play out as expected (the AML policy response unit).

The support of TI-S to NCs’ requests for additional funding as well as flexibility of the donor in substituting or adding activities resulted in several NCs as well as TI-S going beyond their original workplan and carrying out additional activities.

EFFICIENCY

The objectives were achieved relatively economically. It was a good-value-for-money project and at least one NC thought it was excellent value for money.¹³

The flexibility and responsiveness in re-allocating funds as needed helped support additional activities not included in some NCs’ workplans, as money was re-allocated following the NC in Senegal not finishing the project.¹⁴

For the NCs which received small envelopes, little was left for activities once salaries had been paid. Limited resources also meant no additional staff was recruited which might have impacted their ability to deliver - while other NCs could recruit or maintain existing staff.

Overall, the National Chapter and TI-S project management arrangements worked well, although this evolved over the course of the project.

During the project, it became clear that some NCs were carrying out activities faster than others, and this might have impacted the degree of interaction between NCs and TI-S. Communications issues between TI-S and the NC in Senegal ultimately resulted in the NC not receiving the last project’s instalment and not finishing the project.¹⁵

NCs were involved in project planning and provided input for the proposal to the EU, which provided some ownership. While NCs were consulted, the EU grant itself had already identified some needs and objectives for the project, such as “design and implement a mechanism to regularly monitor progress on the effective implementation of AML preventive and enforcement

¹² Interviews with TI-S and NCs, May 2020.

¹³ Interview with NC, 20 May 2020.

¹⁴ Interview with TI-S, 28 May 2020.

¹⁵ Interview with TI-S and NC, May 2020

measures, as well as of anti-corruption measures”.¹⁶ Such mechanism was not the first priority for NCs which wanted to do more capacity building and working with journalists. Nonetheless, the budget was largely created on the basis of what NCs’ submitted and NCs developed their own workplans and choose their own activities.¹⁷

Overall, none of the risks that had been identified in the original risk analysis materialized – while other problems - such as delays - did.¹⁸ There was also little use of the Impact Matrix by TI-S and most NCs.

SUSTAINABILITY

Some of the benefits of the project are likely to continue, such as networks and partnerships with the public and private sector. The reputation of NCs as experts on AML mean they can be sought out by journalists for quote or material, at least in the short to medium term.¹⁹ Existing resources (videos, guides, comic books) can be reused.²⁰ NCs might still be able to carry out some activities, such as meeting with institutions (FIU), and some are trying to mainstream AML in their program.

Financially, while most NCs and TI-S stated they wished to work further on the topic, they have currently no funds to do so.²¹ While there is a follow-up EU project to SAMWA called OCWAR, there is no specific CSO component to it.²² A GIABA representative stressed it was critical to keep working on AML, stating “if the pressure goes down, some of the successes disappear”. Several NCs felt in a good position to apply if funding opportunities on AML came up.

There are some factors that could impact negatively on the sustainability of the project however. Some NCs are wary of losing knowledge if staff involved in the project leave the chapter. As a result of COVID-19, many people are now working from home, and activities such as meetings cannot take place. Another issue is maintaining the tracker up-to-date. NCs cannot update it directly and it is not clear who in TI-S would be in charge of collecting new data from NCs and updating the tracker. If the content is not maintained up-to-date, there is little value in the long term to it.

LESSONS LEARNED

At the level of TI-S:

- Two-years projects are challenging.
- TI’s name is an asset in the region.
- Working regionally is a strength.
- Tools relying on surveys/data collection can be time-consuming to set up.
- Flexibility from donors is helpful.
- Conducting research can be a challenge but the benefits are many.
- Gender mainstreaming is needed.

¹⁶ See the EU “Guidelines for Grant applicants”: <https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?f%20ADSSChck=1482208131829&do=publi.detPUB&searchtype=QS&orderby=upd&orderbyad=Desc&nbPubliList=15&page=1&aoref=154261>

¹⁷ Interview with TI-S and NCs, May 2020. See NCs’ workplans.

¹⁸ See Detailed risk analysis and contingency plan, Amendment Annex. No risk analysis feature in the 7 participating organisations workplans.

¹⁹ Interview with TI-S 21 May 2020.

²⁰ Interview with TI-S 21 May 2020.

²¹ Interview with NC, 25 May 2020.

²² Interview with TI-S, 28 May 2020. Expertise France, OCWAR-M, <https://expertisefrance.fr/fiche-projet?id=774453>

- Consider the numbers of participants if grant is small/less than 600K.

At the level of NCs:

- Exchanges/crosspollination between chapters.
- Using different funds efficiently to do more.
- Working closely and early on with public institutions/FIUs.
- Working with investigative journalists and bolstering their capacity is a win-win.
- NCs can be leaders on AML in the region.
- Sharing and replicating research methodology between NCs is more efficient.
- Working on a new issue can be stimulating and offer opportunities for future fundraising.

RECOMMENDATIONS

- Ensure that all key documents/material generated during the project feature on the AML webpage.
- Ensure that the tracker remains up-to-date on the 4 countries – or retire the page/tracker.
- Ensure that NCs who had success stories write down their experience.
- Ensure sharing of methodology on research between NCs.
- Set up a regional AML coalition or network with the 7 participating organisations which can be managed by one of the NCs continuing work on AML.
- Make sure that NCs use the same formats for workplans, mid-term and final reports.
- Enhance regional cooperation and communication in advance and during regional projects by adding a regional work component to the project.
- When/if in the future an NC organises trainings on AML issues, invite a couple of NC who worked on the project.
- Ensure to build up contacts systematically with institutions as these contacts outlive the project and help with continuation.
- Recruit a gender specialist to support and advise NCs.

INTRODUCTION

The primary purpose of this evaluation is summative: to assess the achievements and results, strengths and weaknesses of the European Union-funded project “Turning up the Pressure: Tackling money-laundering through multi-stakeholder approaches in ECOWAS countries” and to provide an analysis of its performance and impact through the criteria of relevance, outcomes and impact, effectiveness, efficiency and sustainability. The evaluation provides lessons learned and good practices from the project, and feeds into the design of clear and actionable recommendations. In turn, these recommendations can later be used to enhance future project designs or engagements of TI-S and National Chapters (NCs).

“Turning up the Pressure” is a two-year project in Ghana, Nigeria, Senegal, Guinea, Liberia, Sierra Leone and Côte d’Ivoire that ended in December 2019. The total budget of the project was 515,000.00 EUR.

The focus of the project was on the implementation of existing commitments and recommendations related to anti-money laundering (AML) in countries, with a focus on the 7 countries mentioned above. In this context, the expected overall long-term impact of this action was to increase public awareness for and political commitment to anti-money laundering and anti-

corruption mechanisms which effectively prevent, detect, report and sanction the laundering of corrupt and criminal proceeds in practice in ECOWAS countries.

This being a geographically broad project, not all activities for each NCs and TI-S are looked at in details.

In short, this evaluation:

- Provides an objective assessment of the achievements and results, weaknesses and strengths of the project, as well as an analysis of its performance in terms of progress and process, relevance, sustainability, and the extent to which the project is contributing to enabling the desired impact.
- Generates lessons learned and good practices from the project.
- Provides clear recommendations that can guide the TI Secretariat (TI-S) and National Chapters for the implementation of future projects.

While initially planned to start mid-March 2020, the evaluation process was delayed due to the impact of the COVID-19 crisis and started on 20 April instead. The evaluation ended on 15 June.

CONTEXT

In the course of the identification phase of the project SAMWA (Strengthening Anti-money Laundering capacities in West Africa), the EU realized that there was limited political commitment to AML. This was evidenced by the low number of prosecutions that followed investigation and by the period of time it took in many countries between the adoption of the law creating the Financial Intelligence Unit (FIU) and actual commencement of operations.²³

The EU concluded that public awareness and political commitment are a prerequisite for the success of AML efforts and that regular and independent assessment of progress can be an effective mechanism to secure necessary political commitment (social pressure).²⁴ This project stems from this realization. “Turning up the Pressure: Tackling money-laundering through multi-stakeholder approaches in ECOWAS countries” was designed to “generate an environment of joint pressure from civil society, media, private sector companies and bodies, and key public anti-money laundering institutions around a shared set of priority recommendations” in selected ECOWAS countries.²⁵ This project aims to direct advocacy efforts towards the implementation of priority recommendations.²⁶

The project’s Overall Objective was to “increase public awareness for and political commitment to anti-money laundering and anti-corruption mechanisms which effectively prevent, detect, report and sanction the laundering of corrupt and criminal proceeds in practice in ECOWAS countries”.²⁷

²³ “Two regional projects have already been launched by the EU in the areas of anti-money laundering. Several FIUs have already been supported in West Africa. One project (2013-2014) funded by the IFS focused on reinforcing control measures in the non-financial sector of four countries. The SAMWA project (Strengthening Anti-money Laundering capacities in West Africa), funded by 10th EDF (€3 million) will focus on reinforcing preventive and enforcement capabilities in 15 countries in West Africa.” See Strengthening Anti-Money Laundering Capacities in West Africa”, EU Guidelines for grant applicants, 7 February 2017.

²⁴ See Strengthening Anti-Money Laundering Capacities in West Africa”, EU Guidelines for grant applicants, 7 February 2017.

²⁵ Amendment Annex A.2.

²⁶ Amendment Annex A.2.

²⁷ Amendment Annex A.2.

The project had 4 specific objectives:

Objectives
O1: Existing anti-money laundering and anti-corruption commitments and recommendations for ECOWAS countries are compiled on a publicly available platform, which allows for civil society and media monitoring.
O2: Media coverage by investigative/business journalists of corruption and money-laundering cases in ECOWAS countries regularly refers to the need for effective implementation of existing anti-money laundering recommendations and commitments.
O3 - Increased structured engagement on anti-money laundering and anti-corruption between private sector, law enforcement, elected officials, media and civil society leads to greater public, expert and practitioner awareness of priority actions needed and the path ahead to their implementation.
O4 - Regular public monitoring and progress reporting increases public, expert and private sector pressure for the effective implementation of existing priority anti-money laundering commitments and recommendations in ECOWAS countries.

The planned outcomes followed a specific sequencing: collating the priority recommendations on tools (tracker, portal) (O1), getting media reporting on these recommendations (O2), creating a broad coalition which will become aware of the recommendations (O3) and reporting on progress made on the recommendations which would increase the pressure for their implementation (O4).

The project involved 6 National Chapters in ECOWAS (in Ghana, Nigeria, Senegal, Liberia, Sierra Leone and Côte d'Ivoire) and one external partner in Guinea. The project participants were selected differently – some NCs were included in the EU call and the rest of the NCs were proposed by the regional advisor to contribute proposals.

The participating organisations received different financial contributions as 3 NCs (in Ghana, Nigeria and Senegal) were prioritised and listed in the Amendment Annex as formal co-applicants and beneficiaries/affiliated entities.²⁸ The total budget of the project was 515,000.00 EUR.

NCs developed their own workplan with some feedback from TI-S. Not all NCs worked on the 4 outcomes and it is not always clear on which outcome the NCs worked. Two Chapters, Ghana and Nigeria, were also working in a DFID-funded project on the related issue of Beneficial Ownership Transparency program. They were also receiving funds from the IMPACT grant.²⁹

The 2-year project was meant to start on 15 September 2017 and its original end date was 14 September 2019. However, the project started later than its planned original date, largely due to the late recruitment of the project manager in February 2018. This resulted in a request in October 2018 for a 3 month no-cost extension and the project ended in December 2019.

CHRONOLOGY OF THE PROJECT



²⁸ See Interim narrative report.

²⁹ Amendment Annex A.2.



METHODOLOGY

This evaluation used several methods:

1 - Inception meeting: An initial meeting with TI-S MEL Unit and the Policy and Advocacy team on 23 April 2020 helped fine-tune the evaluation methodology and provided the consultant with the views and expectations for the evaluation. A broad history of the two-years project was discussed. The importance of the TI Impact Matrix as a lens to put the evaluation in a wider context was pointed out. A possible case study on investigative journalists was discussed. The consultant reiterated that a gender perspective will be used throughout the evaluation. Finally, the challenges raised by the current global crisis related to COVID-19 were highlighted. Following the meeting, a methodological note was sent to TI-S on 6 May which was reviewed by TI-S.

2- Documentation review

The documents review concentrated on the following documents shared by the Project Management Team:

Documents

- Amendment Annex dated 16 August 2019.
- Chapter workplans, for all 7 participating organisations in ECOWAS.
- Final reports for all 7 participating organisations.
- Impact Monitoring Guide.
- TI 2020 strategy 'Together against corruption' and implementation plan..
- Project grant documents (including contracts between TI-S and donor and TI-S and NCs/contact organisations, as well as budgets and annual plans).
- Relevant information from TI-S website regarding AML tracker.
- Relevant communication between TI-S and NCs/ contact organisations.
- “Strengthening Anti-Money Laundering Capacities in West Africa”, EU Guidelines for grant applicants dated 7 February 2017.
- Cooperation Agreement with CENOZO.

The final report for the project was not available.

3- Interviews

In order to identify key stakeholders for interviews, the following criteria were used:

- Relevance
- Availability
- Country balance
- Geographical spread
- Critical to triangulation of information

Separate interview guidelines to interview different categories of stakeholders were developed and sent to TI-S on 18 May:

- Guidelines for TI-S Staff
- Guidelines for NCs and partner organisations
- Guidelines for external actors

Structured interviews with relevant staff at TI-S and National Chapters/contact organisations, stakeholders and beneficiaries were conducted remotely using Skype or WhatsApp. Interviews with TI-S took place in April and May. All others interviews took place in May. In total, 19 people were interviewed.

	TI-S	Côte d'Ivoire	Ghana	Guinea	Liberia	Nigeria	Senegal	Sierra Leone
Internal	2	1	2	1	1	1	1	1
Beneficiaries: investigative journalists/ FIUs		1		2		1	1	1
Allies: CENOZO; ICIJ; GIABA	3							
TOTAL	19							

The interviews were carried out either in English or French to suit the mother language of the interviewees. Most respondents were readily available, easily reachable and keen to share their experience over the project. All participating organisations were interviewed. Two of them were asked for contacts with the FIU of their country. In one case, the FIU staff could be interviewed. In the other case, the FIU official contacted by the NC requested prior authorisation from his hierarchy. Unfortunately, at the time of this report, no answer has been received. Efforts were made to contact the director of GIABA but no answer has been received to date. Another GIABA staff member made himself available however.

As requested in the ToRs, a short case study was carried out. TI's Impact Matrix helped put findings and results into a broader context. In line with the ToRs, the final report is no longer than 20 pages, excluding the annexes and the executive summary, and is accompanied by a summary power point presentation.

Ethical protocol: Confidentiality and privacy of participants

Anti-money laundering is a sensitive topic. As a rule, full set of notes were not shared with the client unless specifically requested. Interview notes are anonymized to protect the identity of experts. Notes are marked as confidential and password-protected.

FINDINGS

The findings for each of the five evaluation criteria - relevance, outcomes and impacts, effectiveness and efficiency – are presented below.

RELEVANCE

The project was important and relevant in the wider context of the fight against corruption in ECOWAS.³⁰ To all respondents, the project was relevant because of the importance of money laundering in their country and in the region and the need to address it. Money laundering remains underreported and not widely understood by the general public in West Africa while it is in fact key in the fight against corruption. For several NCs, the project was timely because of the real estate boom in their own countries. As the general public asked themselves questions about all the new buildings, which are often left empty, NCs had an entry point to explain that in some cases, those new buildings were the results of money (proceeds from corruption, drug trafficking etc.) being laundered. For other NCs, there were high-profile scandals on AML during the course of the project which stressed the relevance of the project. The NC in Ghana wanted to be involved in the project because of Ghana's commitment in London in 2016 and because of its own work on Beneficial Ownership.

For TI-S, the project was “in line with Together Against Corruption, the Transparency International 2016-2020 Strategic framework, which under the Prevention, Enforcement and Justice priority area aims to develop, monitor and advocate for key anti-corruption standards and practices, with a particular focus on country level implementation of international standards.”³¹ Participating NCs had mixed prior interests and experiences on AML. NCs in Ghana, Côte d'Ivoire, Nigeria and Senegal are all part of the Tax Justice Network Africa.³² NCs in Nigeria and Ghana were also part of TI project on Beneficial Ownership Transparency, and AML was a strategic priority for the NC in Nigeria. NCs in Sierra Leone and Liberia and the partner organization in Guinea were not working on AML at the time.³³

The project's overall objective was to “increase public awareness for and political commitment to anti-money laundering and anti-corruption mechanisms which effectively prevent, detect, report and sanction the laundering of corrupt and criminal proceeds in practice in ECOWAS countries”.³⁴ While there is no data or baseline available, it can be assumed that at the start of the project, public awareness of AML in participating countries would have been very low – as it is in many parts of the world. FIUs are often unable to carry out awareness activities and while CSOs in the region have been working on issues connected to AML such as corruption or good governance in natural resources, little had been done by CSOs on AML specifically. One anecdotal element on low awareness in the region are the difficulties encountered by NCs during the survey exercise. There was a low rate of responses – which might have been due to the electronic format used at first, but some NCs also noted that people who were expected to know about AML did not.

³⁰ Interviews with TI-S and NCs, May 2020.

³¹ Amendment Annex A.2.

³² See <https://taxjusticeafrica.net/members/>

³³ Interview with TI staff, 21 May 2020 and interview with NC, 22 May 2020.

³⁴ Amendment Annex A.2.

Similarly, some NCs realised during trainings and workshops that members of the police, of the judiciary etc. knew little about money laundering. This gap in knowledge also points out to a possible avenue for future work which would be to create some baseline research on AML throughout all 7 participating organisations on a key area (such as real estate).

Many NCs carried out awareness-raising activities, including radio and TV shows, training sessions, videos, blogs etc. While the project had no baseline and did not set specific targets for the number of members of the public it wanted to reach out to, NCs nonetheless produced figures on the number of participants for workshops and training sessions. For instance, in Ghana, over half of the 44 journalists trained were women.³⁵ It is however a challenge to know exactly how many people listened and understood the radio and TV shows – NCs said auditors phoned in and asked questions but did not provide numbers. For one FIU representative, the project clearly contributed to raising awareness – for instance on how cash payments in real estate is a red flag - because the FIU started receiving more reports on money laundering.³⁶ Some further understanding on awareness could be gained from the numbers and countries of origin of people who have engaged with the content on the AML portal (i.e. numbers of views of videos).

As a result of research carried out in the course of the project, new information previously unavailable to government institutions such as FIUs came to light³⁷, new networks and partnerships were set up with public and private sectors. All 7 NCs and contact organisations have now common knowledge on AML as well as the ability to seek funding for AML projects – while some of them are recognized as leaders on AML in their countries.³⁸ Through the support of the project, TI was able to attend and influence high-level meetings with GIABA and the Egmont Group.

This project did turn up the pressure – but not following the sequencing in the theory of change. For the EU, “regular and independent assessment of progress can be an effective mechanism to secure necessary political commitment (social pressure).”³⁹ The idea was therefore that reporting on progress would ‘turn up the pressure’ and contribute to the implementation of some priority recommendations. The planned outcomes followed a specific sequencing: collating the priority recommendations on tools (tracker, portal) (O1), getting media reporting on these recommendations (O2), creating a broad coalition which will become aware of the recommendations (O3) and reporting on progress made on the recommendations which would increase the pressure for their implementation (O4). However, the process of identifying the recommendations (O1) was lengthier than expected and NCs’ carried out activities before the priority recommendations had been settled on – thus not following the original sequencing. Advocacy meetings with key institutional/political actors and decision-makers is a straightforward approach to move from general awareness to actual implementation – and this is a path that many NCs and TI-S did use in the end. It is not possible to see on the tracker if any of the priority recommendations have been implemented.

There is broad agreement however - including by GIABA and FIU - that having a multi-stakeholder approach on AML was an innovative as well as successful approach.⁴⁰ AML is a

³⁵ Interim Narrative report.

³⁶ Interview with journalist, 25 May 2020.

³⁷ Interview with journalist, 23 May 2020.

³⁸ Interviews with TI-S and NCs, May 2020.

³⁹ See the EU “Guidelines for Grant applicants”: <https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?%20ADSSChck=1482208131829&do=publi.detPUB&searchtype=QS&orderby=upd&orderbyad=Desc&nbPubliList=15&page=1&aoref=154261>

⁴⁰ Interview with NC, 25 May 2020.

sensitive and complex problem, with a significant impact on society and it needs to be tackled through a sustained collaborative approach that include all key stakeholders.⁴¹

OUTCOMES/IMPACT

Reporting on impact could have been a challenge, as this was a short project of 2 years.⁴² However, the level of ambition was moderate - it was about ‘turning up the pressure’, not “changing this or that”.⁴³ The project achieved the expected impact of contributing to increase public awareness for and political commitment to anti-money laundering and anti-corruption mechanisms in the targeted countries.⁴⁴ As the table below shows, the targets for the outcomes were mostly met and in some cases, other objectives not originally envisaged were achieved.

Table (on the basis of Amendment and the Mid-term report)

Outcome (O)	Baseline	Original target (original logframe)	Target reached by Sept 2018	Target reached by end of Project
Overall objective/impact	2016: Political commitments made by Ghana, Nigeria and Senegal at the London Anti-Corruption summit	A minimum of 2 high-level political commitments per country	4 countries (Ghana, Nigeria, Cdi and Guinea) made statements.	Unclear if original target met as such. However, high-level engagements with GIABA, Egmont Group, Guinea Justice Minister.
O1: Tracker and platform	zero. AML recommendations not yet compiled publicly	2000 clicks per month, by the end of the Action; an average 300 downloads per report	zero	Partly achieved as not all countries included. No data available on numbers of clicks, downloads.
O2: Media coverage	Zero	featured on first page of search engines for “ML” “corruption” + country name	input in the West AfricaLeaks	More than 300 articles referencing the project of activities; Radio and TV shows.

⁴¹ Interview with NC, 25 May 2020.

⁴² Interview with TI-S, 28 May 2020.

⁴³ Interview with TI-S, 21 May 2020.

⁴⁴ Amendment Annex A.2. Interview with TI-S, 21 May 2020.

O3: Structured engagements	Between 1 and 5 existing networks in each country addressing different aspects of anti-money laundering and anti-corruption	a multi-stakeholder network addressing AML and anti-corruption priority recommendations in each of the 7 countries	10 joint initiatives and partnerships (CENOZO; MoU TI-SL and FIU; networks in all 7 countries; Regional WhatsApp group of investigative journalists).	Several WhatsApp groups of journalists; Some form of stakeholder networks in all 7 countries
O4: Progress reports	Zero	No target defined (in the original logframe);	4 public statements	Other formats used, i.e. blogs.

Hundreds of people – including a significant number of journalists – participated in trainings or workshops which expanded their understanding of AML. To assess improved awareness, NCs used different approaches. For instance, the NC in Liberia sampled the views of workshop participants on some concepts and definitions before and after the training. The NC in Guinea asked for expectations at the beginning and the end of the trainings. The NC in Côte d’Ivoire used different approaches depending on the audiences (games, score cards). Many outputs were produced – reports, papers, brochures, blogs, videos, a comic book, plays, radio and TV programs to make AML an accessible concept to the general public. NCs used concrete examples to explain money laundering and relate it to their daily lives. Ground-breaking research was conducted by some NCs, notably on real estate in Guinea and on vulnerable sectors vulnerable to money laundering in Côte d’Ivoire.⁴⁵ As for increased political commitment, there were clear instances of ‘turning up the pressure’ as in Guinea, where following a TV show on AML, the Prime Minister asked the Minister of Justice to make progress on AML cases.⁴⁶ The NC in Nigeria obtained successes on important technical issues, such as pushing and obtaining that the Central Bank reports on number of suspicious transaction reports (STR) per year. This is a positive development as it increases scrutiny – questions can now be asked as to the number of investigations resulting from the STRs.⁴⁷

Some of the expected outcomes were achieved quickly (O2, O3). O3’s target was a multi-stakeholder network addressing AML and anti-corruption priority recommendations in each of 7 countries, which has been achieved under different iterations depending on countries. For the first time, and as a result of this project, there is now a partnership between CSO, media and institutions/FIUs on AML in some countries.⁴⁸ FIUs saw that CSOs can help them in their work. The NC in Nigeria noted that while it had previously been difficult to work with government actors, they now have an extended network of police, intelligence, CSOs. Some high-level advocacy lobbying took place, including with the Minister of Justice in Guinea. TI was able to attend the GIABA plenary.⁴⁹ TI was also invited to attend an Egmont Group meeting and contributed to their work on FIU’s autonomy and independence. In some countries, relationships

⁴⁵ Social Justice: <https://socialjustice-ci.net/public/publications/fichiers/1577802143.pdf>

⁴⁶ Interview with FIU, 28 May 2020.

⁴⁷ Interview with NC, 20 May 2020.

⁴⁸ Interview with TI-S and FIU, 28 May 2020.

⁴⁹ Interview with TI staff, 28 May.

were also created with private sectors and Designated Non-Financial Business and Professions (DNFBP), especially estate agents. TI staff and the participating organisation in Guinea consider that there is now awareness and understanding in the Guinean real estate sector of the risks of money laundering.

One impact not clearly stated by the Amendment is that the project would expand the understanding of AML in NCs and helped some NCs to be seen as leaders on AML issues in their countries. NCs developed technical expertise on the topic. Developing and strengthening networks regionally and between NCs was also a success.⁵⁰ Horizontal learning was part of the original methodology in the Amendment Annex and there were several regional workshops which allowed NCs to share their experiences. Some NCs had their own initiatives: the NC in Nigeria invited the NC in Ghana to make a presentation in Nigeria. If anything, NCs would have liked to learn more from each other, especially from the NCs in Nigeria, Guinea and Côte d'Ivoire.

Nonetheless, some outcomes are below expectations, in particular O1 which was late, contains 4 countries out of 7 and misses one key country (Senegal) and is viewed as a missed opportunity. O4 had no identified targets in the Amendment document, and instead of releasing progress reports, other formats were used.

All in all, using TI's Impact Matrix as a lens, this project scored gains on behaviour change and policy and institutional changes.

While it is difficult to assess how many people were affected by the project, it benefitted many different groups such as journalists, FIUs, various institutions (police, intelligence services), private sectors (banks, real estate), and the NCs themselves.⁵¹ It is unclear if women and men equally benefited from the project, apart from specific activities that were sex-disaggregated.

EFFECTIVENESS

It can be challenging to track progress and see the degree to which outputs and activities were achieved by NCs and TI-S levels in relation to the initial targets. While the Amendment and the Mid-term report refer to baselines, targets and outcomes, this is not the case of the contracts signed between TI-S and NCs which bear no reference or data on baseline and targets.⁵²

Some of the NCs' workplans provided by TI-S have some targets and only a few list outcomes but all the workplans are in different formats, word document or other excel spreadsheets, which makes comparison challenging.⁵³ NCs all chose their own activities and did not work on all outcomes. There was not always a clear link between the planned outputs/activities and the expected project outcomes.

The final reports submitted by NCs are all in the same template but at least one NC stated it only reported the activities in the original workplan in its final report – which meant some activities and results were not recorded. This is a missed opportunity. At the level of TI-S, the mid-term report show progress per outcome, not per NCs', but use some of the NC's as examples. This means it can be difficult to see and show how each NC contributed to each outcome. The final report by TI-S for the project is currently not available, which complicates the tracking. A lot has been done and it is important to record it.

⁵⁰ Interviews with NCs, May 2020.

⁵¹ Interview with NC, 20 May 2020.

⁵² See Amendment Annex A.2 and Interim narrative Report.

⁵³ See Amendment Annex A.2 and Interim narrative report and Workplans.

Some outcomes were achieved quickly and relatively easily (O2 and O3) while others took longer or were not achieved as planned (O1, O4).⁵⁴ The timeline for some outputs proved unrealistic as they turned out to be more time consuming or took longer than expected (the tracker, the survey), or didn't really play out as expected (the AML policy response unit).

There is broad agreement however - including by GIABA and FIU - that having a multi-stakeholder approach on AML was an innovative as well as successful approach.⁵⁵ One NC explained that having a multi-stakeholder technical panel can contribute to change - as the various actors can put pressure on each other during the meetings.⁵⁶

Of note as a successful approach was working early and closely with FIUs – including for the development of the NCs' workplans. For instance, the NC in Sierra Leone signed a Memorandum of Understanding (MoU) with the Financial Intelligence Unit (FIU). It allowed NCs to create a working relationship with FIUs, to reflect their views in the workplan. The FIUs are the first to see the lack of implementation of AML measures. Some NCs presented themselves as an ally to the FIU that would help them solve some of their problems – of resources, implementation, visibility, media access. The advantages of such connections for NCs are numerous: it has regular access to information from FIU, can lobby them, can tailor their larger advocacy messages or developing further strategies on the implementation of AML measures on the basis of actual FIU recommendations. Productive engagement with public institution can be often due to a single individual in the institution who has an interest and see an opportunity so it depends on context and is not always replicable. One NC noted that they were lucky to find competent stakeholders in place, which might explain their quick pace and success in achieving their objectives.

Successful approaches/activities
Videos produced by TI and the video produced by the NC in Côte d'Ivoire.
Working with FIU, including developing workplans together; radio programs. ⁵⁷
Research; real estate agent research being replicated in other countries.
Trainings: Meetings up-country ⁵⁸ , capacity building ⁵⁹ , multi-stakeholders trainings. ⁶⁰
Working with journalists.
Radio programs. ⁶¹
Cross learning and sharing experience across chapters. ⁶²
Use of art: plays, comic book. ⁶³
Focusing on technical aspects/issues (STRs in Nigeria).
Advocacy – including high-level advocacy (attendance to GIABA, Egmont Group meetings ⁶⁴).

The challenges as seen by NCs and TI-S were varied; it included lack of resources for some NCs,⁶⁵ staffing issues (delays in recruitment at TI level; staff turnover in one NC; lack of funds to recruit new staff in NCs; challenge of recruiting expert and consultants for NCs), the short length of the

⁵⁴ Interview with TI-S, 28 May 2020.

⁵⁵ Interview with NC, 25 May 2020.

⁵⁶ Interview with NC, 21 May 2020.

⁵⁷ Interview with TI staff, 28 May.

⁵⁸ Interview with TI staff, 28 May.

⁵⁹ Interview with NCs, May 2020.

⁶⁰ Interview with GIABA staff, 26 May 2020

⁶¹ Interview with TI staff, 28 May.

⁶² Interview with NC, 25 May 2020.

⁶³ Interviews with NC, 18 May and TI staff.

⁶⁴ Interview with TI staff, 28 May.

⁶⁵ Interviews with TI-S and NCs, May 2020.

project, the time consuming issue for TI-S of translating everything in both English and French, the differences between NCs' needs and the requirement of collecting data for the portal and the tracker.

The focus on technology tools such as the tracker was a risky approach in the context of West Africa and was not particularly successful. Outcome 1 was made of 2 outputs: an AML Portal which was to compile available recommendations and commitments on a single platform and an AML tracker which would focus on selected priority recommendations and commitments and will track their implementation throughout and beyond the duration of this Action. Several issues slowed the delivery of these outputs. Collecting data on priority recommendations and commitments for the survey was challenging as many participants to the survey did not reply to the survey in its electronic form. Another different attempt was made – approaching directly participants – but was more time consuming. In addition, a decision was taken to not have the portal as a stand-alone page but to embed it into the TI website so that it would benefit from the traffic of TI website and for sustainability in the long-term. However, as TI website was being redone, this delayed the design and launch of the portal.

The tracker was launched in March 2019, for a project that ended in December 2019, little time was therefore left to track progress. Currently, the tracker does not show progress achieved since the beginning of the project. It only displays key recommendations or areas of improvement for Ghana, Nigeria, Sierra Leone and Guinea - 4 countries out of the 7 participating countries – and misses one of the co-applicants – Senegal. It is not possible for NCs to update the tracker directly. One participating NC noted that the tracker was supposed to be a place recording progress and helping bring transparency, and it could have helped to push for advocacy but that instead it impeded their ability to do advocacy.⁶⁶ However, other participating NCs found the tracker useful, as a place to refer national institutions or journalists to.

The support of TI-S to NCs' requests for additional funding as well as flexibility of the donor in substituting or adding activities resulted in several NCs as well as TI-S going beyond their original workplan and carrying out additional activities. NCs could approach the regional advisor for technical questions. The regional coordination and the regional meetings were appreciated. The larger NCs noted the facilitation role of the project manager with GIABA, CENOZO and with other NCs. With smaller NCs, which had received less funds and were carrying less activities, the engagement with TI-S appears have been less sustained.

EFFICIENCY

The objectives were achieved relatively economically. It was a good-value-for-money project and at least one NC thought it was excellent value for money.⁶⁷ The overall budget of 515,000.00 EUR was split between 7 NCs and TI-S and covered a 2-years period. The overall expenditure for all NCs is about 250,000 euros – with Nigeria receiving the largest amount of money (61,124.3 euros).

There were synergies with other TI-S actions since the NCs in Nigeria and Ghana were working on the Beneficial Ownership Transparency project. The NC Nigeria used the EU IMPACT grant to fund in full some activities related to “Turning up the pressure”.⁶⁸ The flexibility and responsiveness in re-allocating funds as needed helped support additional activities not included in some NCs' workplans, as money was re-allocated following one NC not finishing the project.⁶⁹

⁶⁶ Interview with NC, 21 May 2020.

⁶⁷ Interview with NC, 20 May 2020.

⁶⁸ Interview with NC, 20 May 2020.

⁶⁹ Interview with TI-S, 28 May 2020.

For the NCs which received small envelopes, little was left for activities once salaries had been paid. Limited resources also meant no additional staff was recruited which might have impacted their ability to deliver – while other NCs could recruit or maintain existing staff.

Overall, the NCs/contact organisations and TI-S project management arrangements worked well, although this evolved over the course of the project. The project manager led 3 similar-size projects including “Turning up the Pressure” and could count on the support of the Regional advisor when needed. Her role in the regional coordination of the project was specifically praised.⁷⁰

During the project, it became clear that some NCs were carrying out activities faster than others, and this might have impacted the degree of interaction between NCs and TI-S. Having already had some connections with FIU or financial institutions made things easier for some NCs. Some NCs have large capacities and several staff – including staff recruited for and paid by the project. The NC in Nigeria also used the IMPACT grant to be able to achieve more.⁷¹ Meanwhile other NCs had limited capacity because they received little funding and could not top it up with other funding. They could not recruit additional staff and they were therefore overstretched but they nonetheless delivered.⁷² For TI staff, there were also differences in capacity and drive.⁷³ Reasons for delays on activities vary between countries. One NC pointed to excessive bureaucracy with government institutions, as well the difficulty to recruit someone qualified to carry out the survey.⁷⁴ Other NCs had different experiences, finding easily skilled individual who could carry out good research for them. There might have been elements of luck, as one NC noted they were surprised to encounter competent stakeholders in various institutions.⁷⁵

Webinars on progress organized by TI-S were often attended by the same NCs. Meanwhile some NCs felt TI-S could be slow to respond to their queries.⁷⁶ Communications issues between TI-S and the NC in Senegal ultimately resulted in the NC not receiving the last project’s instalment and not finishing the project.⁷⁷ Some NCs felt that the regional potential was relatively untapped and more could have been done at that level.⁷⁸

NCs were involved in project planning and provided input for the proposal to the EU, which was appreciated and provided some ownership.⁷⁹ While NCs were consulted, the EU grant itself had already identified some needs and objectives for the project, such as “design and implement a mechanism to regularly monitor progress on the effective implementation of AML preventive and enforcement measures, as well as of anti-corruption measures”.⁸⁰ Such mechanism was not the first priority for NCs which wanted to do more capacity building and working with journalists. Other conditions in the EU project concerning key beneficiary countries (Nigeria, Ghana and Senegal) had an impact on the original allocations of funds.⁸¹ Nonetheless, the budget was largely

⁷⁰ Interviews with NCs, May 2020.

⁷¹ Interview with TI staff, 21 May 2020.

⁷² Interview with TI staff, 21 May 2020.

⁷³ Interview with TI staff, 21 May 2020.

⁷⁴ Interview with NC, 22 May 2020.

⁷⁵ Interview with NC, 20 May.

⁷⁶ Interviews with NCs, May 2020.

⁷⁷ Interview with TI staff and NC, May 2020

⁷⁸ Interviews with NC, 21 May and NC 20 May.

⁷⁹ Interview with NC, 21 May 2020,

⁸⁰ See the EU “Guidelines for Grant applicants”: <https://webgate.ec.europa.eu/europeaid/online-services/index.cfm?%20ADSSChck=1482208131829&do=publi.detPUB&searchtype=QS&orderby=upd&orderbyad=Desc&nbPubliList=15&page=1&aoref=154261>

⁸¹ Interview with TI-S, 28 May 2020.

created on the basis of what NCs' submitted and NCs developed their own workplans and choose their own activities.⁸²

Overall, none of the risks that had been identified originally materialised – while other problems – such as delays – did.⁸³ On the contrary, in several countries, FIUs and government officials generally engage well with the project, and the opportunities to work more closely with them were seized. No risk analysis featured in the 7 workplans, although TI-S prepared an aggregate risk assessment (a document called 'Program and Initiative Risk Register Date assessed: July 2016'), which would have been based on risks assessed by chapters. The Amendment document had highlighted as one of the preconditions and assumptions that priority recommendations could be identified in a participatory manner.⁸⁴ This however turned out to be a time-consuming exercise for both NCs and TI-S project manager, and it incurred delays that had not been foreseen during the planning phase. Similarly, establishing the platform and tracker took longer than expected. Putting together a tracker for 7 countries in West Africa was likely to be a time-consuming and long-winding process as data on AML is not easily available in many countries and data collection can require some logistics. More thought could have been given to how realistic this particular objective was.

The intentions stated in the Amendment were to “keep track of the project impact and outcome indicators and the delivery of outputs, using TI's existing Monitoring, Evaluation and Learning framework called Impact Monitoring”, in order to capture the different change processes the project is contributing to and achieving. However, in practice, there was also little use of the Impact Matrix by TI-S and most NCs. Some NCs used their own tool developed on the basis of Impact Matrix.⁸⁵ For TI-S, the main guiding tool was the log frame. The MEL team did help the project manager with the monitoring, and to bring along the survey. TI-S told NCs to keep track of articles but acknowledged more could have been done to monitor progress. From the perspective of the evaluator, it is challenging to track all the activities carried out, under which outcomes they came and what the impact of these activities might have been. Having a single document giving a general overview could have been helpful to track progress.

SUSTAINABILITY

Some of the benefits of the project are likely to continue, such as networks and partnerships with the public and private sector. Partnerships were set up with CENOZO, ICIJ, OCCRP, Finance Uncovered, the Egmont Group, GIABA. The reputation of NCs as experts on AML mean they can be sought out by journalists for quote or material, at least in the short to medium term.⁸⁶ Existing resources (videos, guides, comic books) can be reused.⁸⁷ NCs might still be able to carry out some activities, such as meeting with institutions (FIU), and some are trying to mainstream AML in their program. Larger NCs, such as in Nigeria, are able to continue part of the work. After receiving requests, the NC in Guinea has been giving free training to the private sector.

Financially, while most NCs and TI-S stated they wished to work further on the topic, they do not have currently the funds to do so.⁸⁸ They are looking for funding, but there is for the moment no

⁸² Interview with TI-S and NCs, May 2020. See NC's workplans.

⁸³ See Detailed risk analysis and contingency plan, Amendment Annex A.2. No risk analysis feature in the 7 participating organisations' workplans.

⁸⁴ Amendment Annex A.2.

⁸⁵ Interview with TI-S, 21 May.

⁸⁶ Interview with TI-S 21 May 2020.

⁸⁷ Interview with TI-S 21 May 2020.

⁸⁸ Interview with NC, 25 May 2020.

general funding for CSO for an overall project across the region. While there is a follow-up EU project to SAMWA called OCWAR, there is no specific CSO component to it although it envisages trainings of stakeholders – including civil society, as well as cooperation with NGOs.⁸⁹ A GIABA representative stressed it was critical to keep working on AML, stating “if the pressure goes down, some of the successes disappear”. But it would be challenging to carry out activities such as trainings, radio programs or research without an external funder.

Several NCs felt in a good position to apply if funding opportunities on AML came up and TI-S has been encouraging them to do so even well before the end of the project and helped whenever possible, for instance using Hewlett Foundation funds to fund some research work on real estate for Benin, Togo and Côte d’Ivoire.⁹⁰ Some NC’s also proposed to try cross countries or cross-organisations collaboration, for instance to benefit from training on AML from the NC in Nigeria.

There are some factors that could impact negatively on the sustainability of the project however. Some NCs are wary of losing knowledge if staff involved in the project leave the chapter. As a result of COVID-19, many people are now working from home, and activities such as meetings cannot take place. Another issue is maintaining the tracker up-to-date. NC’s cannot update it directly and it is not clear who in TI-S would be in charge of collecting new data from NCs and updating the tracker. If the content is not maintained up-to-date, there is little value to it in the long term. The AML webpage/portal currently misses links to some of the material (blogs) produced during the project. In addition, the Policy rapid response unit for investigative journalists on the portal is not used much – as people prefer to directly contact the project manager with questions.⁹¹ Another issue for sustainability is that a lot of the documents produced on AML are currently only in English.

POSSIBLE FUTURE WORK

All NCs and contact organisations said they wished to continue working on AML. Other actors were also keen for them to do so. As one GIABA staff stressed, this project is “about “Turning up the pressure, so you can’t drop the pressure, otherwise it goes down”.”⁹² The responses about possible future work were about deepening the work and some of the approaches of the “Turning up the pressure” project. The areas included:

- more regional coordination on projects - including on investigative projects as the value is high.⁹³
- more training – including to parts of countries outside the capital/not previously covered,⁹⁴ trainings for journalists; using or participating to the trainings offered by larger NCs i.e. in Nigeria.⁹⁵
- more research, including creating a baseline research on AML throughout all 7 NCs on a key area (such as real estate).⁹⁶
- further advocacy work with institutions but also MPs/lawmakers.⁹⁷
- more work on real estate.

⁸⁹ Interview with TI-S, 28 May 2020. Expertise France, OCWAR-M, <https://expertisefrance.fr/fiche-projet?id=774453>

⁹⁰ Interview with TI-S, 28 May 2020.

⁹¹ Interview with TI-S, 23 April 2020.

⁹² Interview with GIABA staff, 26 May 2020.

⁹³ Interview with ICIJ, 22 May and interviews with TI staff.

⁹⁴ Interview with FIU, 28 May 2020.

⁹⁵ Interview with NC, 25 May 2020.

⁹⁶ Interview with journalist, 23 May 2020.

⁹⁷ Interview with journalist, 23 May 2020.

One problematic issue raised by two NCs was that there is little data on AML and women and it could be another area of research.

CASE STUDY - Encouraging investigative journalism in ECOWAS

One of the four specific objectives in the EU call for proposal was to “to encourage investigative journalism on issues related to ML, governance, corruption and development.”⁹⁸The TI project reprised this objective as outcome 2 (O2). Both TI-S and NCs undertook activities under this outcome. Some NCs developed their own program of work with investigative journalists. The NCs in Côte d’Ivoire, Nigeria, Ghana, Senegal and Liberia trained journalists on money laundering issues and NCs in Nigeria, Ghana and Senegal established networks of investigative journalists through this project.⁹⁹ In one instance, an investigative journalist carried out research for an NC and was found to be very useful to the NC. In another instance, an NC worked closely with journalists to develop their opinion pieces.

TI-S led another strand of work on investigative journalism. In January 2019, TI-S signed an agreement with the Cell Norbert Zongo for Investigative Journalists (CENOZO) with the view of “Building capacity of West African journalists when investigating money laundering in real estate”. The partnership with CENOZO contributed to train journalists from countries in ECOWAS over the course of a few days with the idea to help them develop investigative stories on money laundering in real estate. The training got good reviews – including for being practical by focusing on developing skills in order to carry out specific investigations.¹⁰⁰ It helped journalist to understand that the real estate boom in their countries could be connected to money laundering.¹⁰¹ It was also appreciated because it brought along journalists from different backgrounds.¹⁰² In addition, a guide for investigative journalists to conduct investigations in company and real estate ownership was also developed. However, delays at the level of CENOZO, as well as the departure of key staff at CENOZO impacted the rest of the activities. Partly as a result of these, there were less stories (3) on real estate than planned published on CENOZO website and some journalists published their stories using other outlets.

Nonetheless, there is clear value added in working with investigative journalists: there is relatively little investigative reporting in ECOWAS when it can in fact be impactful. Sometimes the impact can be large, resulting in resignation or investigations being opened, other times it contributes to changing cultures and mindsets – which can help to weaken impunity.¹⁰³

It is a clear ask that some resources be found to do a project of specific investigations by journalists. TI could partner with an organisation similar to CENOZO.¹⁰⁴ It could be a pilot project on 3 pilot countries instead of 7 countries, as it might be easier to train a smaller group of people.¹⁰⁵

LESSONS LEARNED

⁹⁸ See Strengthening Anti-Money Laundering Capacities in West Africa”, EU Guidelines for grant applicants, 7 February 2017.

⁹⁹ Interim narrative report.

¹⁰⁰ Interviews with journalist, 25 May; with former CENOZO staff, 26 May; with ICIJ, 22 May; with journalist 1, 27 May 2020.

¹⁰¹ Interview with journalist 1, 27 May 2020.

¹⁰² Interview with journalist 2, 27 May 2020.

¹⁰³ Interview with ICIJ, 22 May

¹⁰⁴ Interviews with journalist 2, 27 May and TI staff.

¹⁰⁵ Interview with former CENOZO staff, 26 May.

Many of the lessons learned focused on working together, being “all hands on deck”.¹⁰⁶ AML is complex, with security issues, secrecy issues: it requires collaboration, coordination, interconnectivity between CSOs.¹⁰⁷

At the level of TI-S:

Two-years projects are challenging: Two-years projects on a regional level on a brand new or complex topic such as AML can be challenging - especially to track progress over such a short period of time. A three-years project might have yielded exponential results – as a TI staff noted: “two years is when things start taking off, but we had to wrap up, it’s more like a warm up for chapters. We are still engaging, we don’t see it ending.”¹⁰⁸

TI’s name is an asset in the region: TI might want to build further on its reputation in the region. Its Corruption Index is very popular.¹⁰⁹ One NC noted that thanks to the TI name, they got access and were listened to.¹¹⁰

Working regionally is a strength: Not all organizations have the capacity of TI to tap into a large network of partner organisations/NCs to implement projects. Focusing on cross-countries projects can therefore be a “niche” or growth area for TI. Such projects help both the visibility and reputation of the whole organisation as well as help individual NCs in building their capacity and secure some funding.

Tools relying on surveys/data collection can be time-consuming to set up: Putting together a tracker for 7 countries in West Africa was likely to be a time-consuming process as data on AML is not easily available in many countries and data collection can require some logistics. More thought could have been given regarding the feasibility of this particular outcome.

Flexibility from donors is helpful: At the level of TI-S: when money became available after the NC in Senegal’s leaving the project, funds could be re-allocated to other NCs in a short time, which meant they were able to accomplish more than they had originally planned. The donor’s flexibility allowed for a more efficient use of the funds. At the level of NCs: NCs developed their workplan and chose their activities, with TI-S feedback. This flexibility is empowering and offered NCs the possibility to work along their already existing approach or strategic priorities, thus bolstering the rest of their work.

Conducting research can be a challenge but the benefits are many: As stressed by several NCs, there is little public data available on money laundering activities or sectors where it applies. The research projects carried out by some of the NCs were therefore extremely helpful as they brought up new information previously unavailable.

Gender mainstreaming: The EU call for proposal did not mention gender and the project proposal and implementation largely reflected this. It is a missed opportunity however not to integrate gender to the project to try and shed light on how AML might impact differently men and women in ECOWAS. Not mainstreaming gender across projects mean TI might be missing some opportunities, some key data and that some key actors might not be engaged. One NC noted that that gender can be donor-driven and that it is difficult for people to understand it is a cross cutting issue.

¹⁰⁶ Interview with TI staff, 28 May 2020; GIABA staff, 26 May 2020.

¹⁰⁷ Interview with NC, 25 May 2020.

¹⁰⁸ Interview with TI staff, 21 May.

¹⁰⁹ Interview with GIABA staff, 26 May 2020.

¹¹⁰ Interview with NC, 20 May 2020.

Many NCs focused on the number of women participating in some of their activities: “if we invited 3 people, one of them should be a woman.”¹¹¹ Some data on attendance to trainings was disaggregated. Some NCs included a gender element in communication - talking for instance about how sex work can be connected to money laundering (under the assumption that sex work is mostly done by women), or giving examples of how money laundering can negatively impact female gold miners.¹¹²

Limit the numbers of participants if grant is small/less than 600K: Splitting 515,000.00 EUR between 7 NCs and TI-S meant some NCs received amounts that made it difficult to propose and carry out sustained activities over 2 years.¹¹³

At the level of NCs:

Exchanges/crosspollination between chapters: Many NCs stressed they appreciated the regional aspect of the project and the possibility to learn from each other on AML during regional meetings organized in the context of this project, but also during other meetings outside of the project.¹¹⁴

Using different funds efficiently to do more: Both NCs in Nigeria and Ghana were receiving IMPACT funds – which cannot be used to top-up other funding. The NC in Nigeria used the EU grant to fund in full some of the “Turning up the pressure” activities.¹¹⁵

Working closely and early on with public institutions/FIUs: FIU might not have enough resources to accomplish their tasks so receiving support from NCs was appreciated. Involving FIUs during the drafting of the workplan was a successful move as it allowed to take into account their views. In addition, as the NC in Sierra Leone noted, working through established state institutions helped get the full cooperation of other state institutions and actors.¹¹⁶ Productive engagement with public institutions is often due to a single individual in the institution who has an interest and see an opportunity so it depends on context and is not always replicable.

Working with investigative journalists and bolstering their capacity is a win-win: it means NCs expand their contacts and their media reach, that more stories relevant to TI’s work are published, and it contributes to challenging impunity in corruption. Working around high-profile cases are a good moment for TI/NCs to explain the cost of money laundering to the wider public and ask for change.

NCs can be leaders on AML in the region: in individual countries, few CSOs are working on AML. This is even more relevant at the regional level, NCs could be a force at the regional level, working together and engaging with GIABA.

Sharing and replicating research methodology between NCs is more efficient: this has been done on real estate – where the partner organization in Guinea shared its research methodology with NCs in Togo, Benin and Côte d’Ivoire for another project. As some of the challenges in

¹¹¹ Interview with NCs, 21 and 22 May 2020.

¹¹² Interview with NC, 22 May 2020.

¹¹³ Interview with TI staff, 21 May.

¹¹⁴ Interviews with NCs, May 2020.

¹¹⁵ Interview with NC, 20 May 2020.

¹¹⁶ Final report of Sierra Leone.

conducting such research might be similar between countries, it could be fruitful to enable communication between chapters.

Working on a new issue can be stimulating and offer opportunities for future fundraising: the NCs which had not previously worked on AML were happy to have done so, and noted it expanded their network, notably by connecting with FIUs, but also their ability to fundraise.

RECOMMENDATIONS

Recommendations	Lead
Ensure that all key documents/material generated during the project feature on the AML webpage.	TI-S
Ensure that the tracker remains up-to-date on the 4 countries – or retire the page/tracker.	TI-S with NCs
Ensure that NCs who had success stories write down their experience – how did they did what they did (i.e. reflecting on engagement with FIUs). Some aspects of their testimonies could appear on the AML page to show the successes of the project.	NCs with TI-S
Ensure sharing of methodology on research between NCs.	TI-S with NCs
Set up a regional AML coalition or network with the 7 participating organisations which can be managed by one of the NC continuing work on AML. Some NC’s also proposed to try cross countries or cross-organisations collaboration, for instance to benefit from other NCs’ training on AML (such as the NC in Nigeria) and sharing lessons/experiences once a year on AML work.	TI-S with NCs
Make sure that NCs use the same formats for workplans/mid-term and final reports and include the outcomes they work on, the baseline and targets. In particular, ensure there is a clear link between the planned outputs/activities and the expected project outcomes.	TI-S with NCs
Enhance regional cooperation and communication in advance and during regional projects by adding a regional work component to the project: a platform for exchange of information at ECOWAS level would help.	TI-S with NCs
When/if in the future, an NC organises trainings on AML issues, invite a couple of NC that worked on the project.	NCs
Ensure to build up contacts systematically with institutions as they outlive the project and help with continuation. ¹¹⁷	NCs

¹¹⁷ Interview with TI staff, 21 May 2020.