SUMMARY

Impact

1. At its inception the AC:DC global programme was groundbreaking for many of the National Chapters and for the Transparency International (TI) Movement as a whole. It supported participating Chapters to take a more public stand on corruption by enabling its victims and witnesses to take direct action. It achieved this organizational shift towards popular demand-side anti-corruption work by expanding the Movement’s network of pioneering Advisory and Legal Advice Centres (ALAC). Through their work with ALACs the Chapters provide a service to individuals and communities and develop an important new constituency for the fight against corruption.

2. Similarly the AC:DC programme provided the opportunity for TI to update and deploy one of its traditional research tools (the National Integrity System - NIS) to engage authorities in policy-changing discussions about transparency and accountability in government and the private sector. TI understands a government’s responsiveness to engage in this as an indication of willingness to do things differently: the first step in change. Both Chapters and the TI Secretariat consider this a paradigm shift for the organization, explicitly pursued in the People Engagement Programme as a new core to the current Movement strategy.

Effectiveness

3. Although ambitious, AC:DC was well managed across a self-selection of TI’s global Movement - 25 countries from a total out of which only two countries (Nigeria and Uruguay) dropped out. In its own terms the programme is successful and many of the logframe output targets were already met during 2011.

4. Most outcome target levels were also reached with systemic changes recorded in over 200 cases across the programme, many involving new legislation affecting core governance areas such as electoral reform, political party financing and freedom of information.

Enhanced impact and effectiveness by linking research and legal advice

5. TI’s research and advisory services complement each other and are most effective when integrated within the business of Chapters. However successes in research-based advocacy were slow in coming which led the 2010 Annual Report to compare the apparent lack of progress in very difficult contexts, for example Nicaragua and Venezuela, with the success of the ALACs. The more established of these, were seen to achieve institutional reform on the basis of a single case, or a cluster of cases.

6. Significant as the ALAC achievements often were the evidence seems conclusive that the work of National Chapters and ALACs is most effective when integrated - the one researching the overall context of corruption and the ALAC illustrating the human consequences of it in the specific case.

7. Successful integration of the ALAC approach within National Chapters is important for Movement coherence but cannot necessarily be taken for granted, given that thorough change in the organisation and culture of the Chapter may be involved.

8. Some early separation between traditional research and the new ALAC approach seems to have disappeared with recognition on both sides of the value of the other and the greater value of better integration of the ALAC work within the national chapter. Several Chapters already combine evidence from both ALAC cases and “traditional”
evidence-based research to reinforce their advocacy campaigns. In some cases this has become a matter of routine.

9. The AC:DC included both research and ALAC functions and this may have made it more difficult to manage but it was helpful to examine how the different functions support each other and a programme focused entirely on ALACs, for example, would have had a more simple logframe but possibly would have led to less learning.

Relevance and Poverty Focus
10. The programme was found to be well distributed especially with respect to the early aims of the GTF for learning from governance work in different contexts. Questions of relevance raise important issues about targeting in anti-corruption work. The Mid-Term Review challenged the programme on its lack of poverty focus citing, the predominantly male, urban and middle-class characteristics of the majority of ALAC users, and recommended more efforts to reach more vulnerable people. The TI response included the assertion that work on corruption has a poverty focus since the poor are more affected as victims than the better off. It also proposed that much anti-corruption work starts with people who are not the most poor (e.g. middle-class civil servants acting as whistleblowers) but ends by working for poorer people when corruption is successfully reduced.

11. Over and above making the case for TI’s open door principal which required a more nuanced approach to targeting, TI adjusted key ALAC procedures: by focusing on outreach work, mobile ALACs made the service more easily accessible in more rural locations; the database monitored levels of vulnerability and gender of complainants and clients; and the selection criteria for innovation projects further facilitated the inclusion of vulnerable populations.

Theory of Change
12. The ALAC Start-Up Manual contains a fairly explicit Theory of Change but this is not a complete description of the understanding of staff and it is not shared as a Theory of Change between the National Chapters. A complete theory of change would make sense of the issues over the poverty focus and would help in the design and management through a logframe.

The logframe
13. The logframe has not provided helpful service as a management tool and has been referred to mostly for reporting against the attainment of indicators. It is difficult to design and manage a single logframe to cover a wide range of activities in very different circumstances in a truly global programme but a better job might have been done.

14. The early achievement of many indicators was not followed by readjustments to targets or activities either by TI or at the request of KPMG and the logframe lost its relevance to programme management.

15. The logframe was weak in some areas where the attainment of indicators did not imply the achievement of the output; easy to measure proxies were used which were too far removed from what they were supposed to represent. For example; Output 4 measures number of complainants as an indicator for empowered citizens. While it is a proxy of willingness to act on corruption it does not fully reflect empowerment in the sense of greater confidence to take action beyond reporting. The ALAC manual indicates that more is expected from a starting point of low activism and low knowledge and the aim of ALACs is to increase both where possible.
16. Conversely some elements of the programme, like the capacity strengthening of the National Chapters, were not assessed by indicators in the logframe despite it being a key part of the programme and, according to the evaluation online survey, extremely successful.

**Sustainability**

17. Much sustainability of activities has been achieved by repeat funding although at least one ALACs is uncertain about the future after the end of AC:DC. The NC’s commitment to continuing the work is driven by a strong sense that the ALAC work makes a difference to citizens. There is some sustainability of impact where citizens, especially those organised into groups or supported by CSOs, have changed their levels of knowledge and motivation.

18. TI staff asserted through the online survey that the most important element for sustainability of impact was public understanding. However, a range of other elements on both supply and demand sides of improvement in governance were also ranked highly as important for sustainability although some way behind public understanding in terms of importance.

**Value for Money**

19. The AC:DC appears to be good value for money in terms of staff awareness of cost drivers and implementation of efficiency savings. More importantly the ability to bring about high level changes through relatively small activities is impressive and the value of some National Chapter work has been very important. The nature of governance and anti-corruption work makes it necessary to assess the VfM of the entire programme since it is not possible to predict which initiatives will necessarily lead to high level impacts.

**M&E**

20. TI has invested significantly in M&E and is better able to monitor its work now than at the start of the AC:DC programme. Many other development actors are also investing heavily in M&E but most are starting from higher levels of performance than TI which is unlike many INGOs in terms of its staff experience. The progress made by TI during AC:DC is significant but overall there is a common acknowledgement that the system is “work in progress”.

21. Some M&E tools are not delivering to their potential and the Scales on Partnership and Advocacy are not able to represent the deep knowledge of staff in what they are achieving through working with others or managing influencing initiatives. The scales may be victims of the difficulties of serving the contradictory aims of local relevance and global aggregation. The aggregation does not represent changes in a meaningful way. Some key elements of changes achieved by the programme are not monitored; for example, changes in attitudes of complainants and clients of the ALACs and capacity strengthening of the Chapters.

**Database and analyses**

22. The global database has been successfully set up and most national chapters have input their data. This was a significant undertaking for a decentralised organisation and in year 5 of the AC:DC 85% of the ALACs have input data. As yet not all Chapters have sufficient data or skills to carry out their own analyses of the graphs and statistics.

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1 Interview with Ghana Integrity Initiative
that they download. Since the Chapters are as yet not fully interrogating their data many obviously interesting and important analyses are not being carried out. As yet, given the variable rate at which Chapters are inputting data, Annual Reports contain only summaries of data and averages which tend to obscure interesting variations. More capacity development for some NC may be required. The rewards, especially in terms of learning across the organisations and national level strategic thinking and decisions, from this investment, will be seen in future years.

Gender
23. The programme provides disaggregated data according to gender and this may lead to changes in management in order to orient work to serve women better. Annual Reports do not at the moment provide an analysis of differences, if any, between the complaints registered by men and women or attempt to explain the extraordinary variations in gender ratios in different countries.

Recommendations
24. The evaluation team recommends:
• maintaining an integrated approach using research and ALAC functions;
• developing Theories of Change to improve sharing ideas about the workings of programmes and development of logframes;
• using Theories of Change to focus M&E on key changes;
• exploring elements of Outcome Mapping to focus on changes at the level of individuals and provide new monitoring tools;
• exploring methods like Process Tracing to evaluate advocacy work;
• testing locally developed scales to complement current monitoring scales;
• supporting NCs to shift from case management to strategic and analytical thinking developing skills in analyses of the data in the database to demonstrate its strategic usefulness
• supporting staff to surface their knowledge of costs and effectiveness in order to facilitate future VfM analyses.
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### Abbreviations

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<th>Abbreviation</th>
<th>Full Form</th>
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<tr>
<td>AC:DC</td>
<td>Anti-Corruption : Delivering Change</td>
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<tr>
<td>ALAC</td>
<td>Advocacy and Legal Advice Centre</td>
</tr>
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<td>AMAN</td>
<td>Coalition for Accountability and Integrity – AMAN, TI chapter in Palestine</td>
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<tr>
<td>AR</td>
<td>Annual Report</td>
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<tr>
<td>ARS</td>
<td>Achievement Rating Scale</td>
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<tr>
<td>BiH</td>
<td>Bosnia-Herzegovina</td>
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<tr>
<td>BOND</td>
<td>UK membership body for NGOs working in international development</td>
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<tr>
<td>CSO</td>
<td>Civil Society Organisation</td>
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<td>DAC</td>
<td>Development Assistance Committee</td>
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<tr>
<td>DFID</td>
<td>Department for International Development</td>
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<tr>
<td>EITI</td>
<td>Extractive Industries Transparency Initiative</td>
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<tr>
<td>ET</td>
<td>Evaluation team</td>
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<tr>
<td>GTF</td>
<td>Governance and Transparency Fund</td>
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<tr>
<td>itad</td>
<td>a UK-based consultancy organisation</td>
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<td>ITC</td>
<td>Information Technology and Communication</td>
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<tr>
<td>KPMG</td>
<td>a global network of professional firms providing Audit, Tax and Advisory services</td>
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<tr>
<td>M&amp;E</td>
<td>Monitoring and Evaluation</td>
</tr>
<tr>
<td>MANS</td>
<td>Network for the Affirmation of the NGO Sector</td>
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<tr>
<td>MoU</td>
<td>Memorandum of Understanding</td>
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<tr>
<td>MTR</td>
<td>Mid-Term Review</td>
</tr>
<tr>
<td>n/a</td>
<td>not applicable</td>
</tr>
<tr>
<td>NC</td>
<td>National Chapter</td>
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<tr>
<td>NGO</td>
<td>Non-Government Organisation</td>
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<td>NIS</td>
<td>National Integrity System</td>
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<tr>
<td>NORAD</td>
<td>Norwegian government aid department</td>
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<tr>
<td>NSA</td>
<td>Non-State Actor</td>
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<tr>
<td>OVC</td>
<td>Orphans and Vulnerable Children</td>
</tr>
<tr>
<td>PNG</td>
<td>Papua New Guinea</td>
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<tr>
<td>PPA</td>
<td>Partnership Programme Agreement</td>
</tr>
<tr>
<td>RSI</td>
<td>Research Stakeholders Implementation</td>
</tr>
<tr>
<td>SMS</td>
<td>Short Message System (mobile phone text function)</td>
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<tr>
<td>TIS</td>
<td>Transparency International Secretariat</td>
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<tr>
<td>ToC</td>
<td>Theory of Change</td>
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<td>TV</td>
<td>Transparency Venezuela</td>
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<tr>
<td>UNCAC</td>
<td>United Nations Convention against Corruption</td>
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<tr>
<td>VfM</td>
<td>Value for Money</td>
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<tr>
<td>WBI</td>
<td>World Bank Indicator</td>
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<tr>
<td>ZESA</td>
<td>Zimbabwe Electricity Supply Authority</td>
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1. **INTRODUCTION**

1. The Governance and Transparency Fund (GTF) was launched in 2007 by DFID under the previous government as a way of funding NGOs to support citizens in developing countries in holding their governments to account in recognition that civil society has a key role to play in promoting accountable governance and transparency.

2. The fund was managed by Triple Line and KPMG although Triple Line dropped out after the first year. Thirty-eight NGOs received funding over five years.

3. The ToR for the final evaluation describe the programme as follows:

   The Anti-Corruption : Delivering Change programme (AC:DC), partly funded by the Governance and Transparency Fund (GTF) of DFID, is a five-year programme with 23 countries in four regions. Due to its thematic and geographic scope, its budget of over 4.6 million British pounds and significant life-span, it is one of the largest and most important programmes of TI.

   The programme aims to increase standards of governance and transparency by empowering TI National Chapters and citizens to address corruption through evidence-based advocacy and the pursuit of corruption-related complaints. It has the following main components:

   **Advocacy and Legal Advice Centres (ALAC)** in 15 countries provide legal advice to victims and witnesses of corruption. Advocacy interventions and campaigns are undertaken as a result of the case analysis, with the aim of promoting more effective public complaints mechanisms and responses by competent authorities and other governance reforms.

   **National, regional and municipal studies** in 8 countries analysed the cause and extent of corruption, the adequacy and effectiveness of national anti-corruption efforts and conformity with international anti-corruption conventions; legally and in practice. The studies also generate tools to monitor government and provide policy recommendations that are included in Chapters’ advocacy campaigns and interventions that aim at promoting change in policy and practice, ultimately allowing citizens to hold their governments to account.

   The programme was started in 2008, and will conclude in September 2013. An external Mid-Term Evaluation (MTR) was carried out between December 2010 and April 2011. The final evaluation is a contractual obligation for the programme, and is a major opportunity to highlight all aspects of the programme, positive and negative, to contribute to learning within TI and to wider learning in the development sector and within DFID.

4. The GTF is not being renewed or extended which makes the final evaluation important for the lessons that can be drawn that will be of value to future work in governance.

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2 DFID launched the £100 million fund which was later increased to £130 million.
3 Argentina, Armenia, Bosnia-Herzegovina, Chile, Colombia, Ethiopia, Fiji, Georgia, Ghana, Kenya, Liberia, Mexico, Montenegro, Pakistan, Palestine, Papua New Guinea, Nepal, Nicaragua, Rwanda, Solomon Islands, Vanuatu, Venezuela and Zimbabwe
5. The international development sector has undergone a significant shift in emphasis during the life of the GTF with an increasing focus on evidence of impact and Value for Money. These changes have affected a wide range of government-funded areas of work and are not specific to international development. The management of the GTF was particularly affected by these changes of focus, partly because of the years in which it ran and partly because it’s starting point was on learning about governance rather than necessarily improving governance in each project setting.

6. The evaluation consultants are aware that TIS and KPMG will be receiving final (Year 5) Annual Reports (AR), Project Completion Reports and reports on Most Significant Results during the time of this evaluation. In the 2012 AR all the relevant outputs were scored as 1 which means the indicators were achieved. For this reason this report is focused more on drawing out lessons and pointing out how the work appears to consultants than trying to add to the mass of logframe-based observations that are being provided by the other reporting.

7. This report is conventional in structure and contains Chapters on Methodology (Chapter 2) and Findings (Chapters 3-9) which cover the main areas of the logframe and key DAC criteria. There are chapters on Innovation, Sustainability, Value for Money and Programme Management. Recommendations in Chapter 10 are addressed to Transparency International, KPMG and to DFID.

2. THE EVALUATION METHODOLOGY

8. The methods used were largely conventional with a reliance on the study of documents, an online survey and interviews with informants. See annex 1 for a list of people interviewed and annex 2 for a list of documents consulted.

9. The overall purpose of the evaluation is to extract learning that would be of value to the Transparency International Movement for future design and management of governance programmes. The focus therefore was largely forward looking although based on a conventional retrospective analysis of what had worked well and what had worked less well. It was important to find ideas and experiences that would be helpful to the client in working on new projects and in the continuation of work started under this programme.

10. At the outset of the evaluation, the Evaluation team (ET) was invited to attend the global “Speak Up” event in Berlin. This was a large scale future scanning, strategic thinking, lesson learning, and networking/community building opportunity for ALAC staff including those funded under the GTF. The team members were able to meet with National Chapter staff from a 16 of the 23 countries participating in AC:DC which helped to set the scene for the evaluation and selection of countries for field visits. A short inception phase was used to refine an evaluation framework which was developed around the key elements of the ToR and used to design specific evaluation tools. Interview guides were drafted for the main constituencies in the evaluation, including: staff in TIS, National Chapters staff, collaborating agencies and networks; and peers in international development. An online survey was designed to be used by National Chapter and ALAC staff in all countries where the AC:DC is operational.
11. The BOND/ITAD\(^4\) definitions of Value for Money (VfM) were used in assessing staff understanding and use of VfM concepts in programme management.

12. The evaluation undertook two visits to Berlin and three country visits: Zimbabwe; Palestine and Colombia. This allowed the consultants to meet with a wider range of NC staff and CSO allies and where possible government actors. In Zimbabwe and Palestine the consultants met with DFID staff which was not feasible in Colombia. Staff in other countries were interviewed using Skype and phone calls.

13. A Skype conference was held with the programme manager at the mid-point of the implementation phase of the evaluation to discuss initial findings and identify additional sources for the evaluation. The ET will meet with the TI secretariat management to discuss the findings and lessons after the delivery and discussion of this report.

**2.1. Strengths and weaknesses of the methodology**

**Time for reflection**

14. The evaluation took place over a period of five months which allowed repeated contact with the client and with informants so that a number of cycles of learning could take place. The country visits were especially rich in terms of direct contact with many informants.

**Low number of responses to online survey**

15. The online survey collected 32 responses which allowed a general appreciation of views from National Chapter staff but the numbers were not sufficient to allow some comparisons as had been hoped. For example; disaggregation by role and by geographic area led to very small numbers in each sub-category so that comparisons were not meaningful. In retrospect the evaluation team may have been overambitious in the numbers of responses that had been expected.

16. The online survey responses were unusually slow in coming and many repeated attempts were made to get NC and ALAC staff to take part in the survey. The evaluation plan had been based on the idea that results from the online survey would have been analysed before the country visits took place and the analyses would have helped to focus attention on key issues for the evaluation. The delays in receiving responses and the relatively early dates of the two of the country visits (Zimbabwe and Palestine) reduced the usefulness of the online survey in being able to point out priority issues for further examination.

17. The ET had assumed it would be able to access up-to-date data for each country involved in the study. However access to the data was mediated through the database manager who understandably had very little time during this peak reporting period.

**Reporting burdens**

18. A difficulty faced by the evaluation team and shared by TI staff was the reporting requirements at the end of the AC:DC programme. National Chapters and regional

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\(^4\) BOND and ITAD, ed, Integrating Value for Money into the programme cycle. BOND, January 2012, Value for Money – what it means for UK NGOs. [Pages on BOND website inaccessible at time of writing].
coordinators were completing annual reports were at the same time as the Project Completion Reports and the Most Significant Results report. Some National Chapters had completed their work on AC:DC in 2012 and were occupied by new work streams.

19. The Evaluation team had committed to visiting four National Chapters to ensure all regions would be represented as well as covering the range of approaches used in AC:DC. The team expected to work with a national consultant in Pakistan, however this eventually proved impossible, by which time it was too late in the process for a UK-based consultant to get a visa and complete the work during Ramadan and meet the agreed deadlines. The ET decided on several Skype conversations with the Chapter and collaborators, which although not ideal, provided adequate insight into the Pakistan Chapter’s work. With hindsight, it might have been better from the outset to have planned for an international consultant member of the Evaluation team to carry out the Pakistan visit.

3. FINDINGS 1 – OUTPUTS

20. The following section considers the 4 AC:DC Outputs. In the AR 2012 these Outputs were all reported as having been achieved with a score of 1 in the Achievement Rating Scale (ARS). The project Purpose was scored 2 in 2012 and 2013. The Outputs have been adjusted during the life of the programme in particular the capacity of National Chapters was moved from Output 4 to Output 2 following the MTR and became more focused on capacity for advocacy.

21. Some initiatives were dropped during the life of the programme as they became less relevant to the programme e.g. UNCAC. All these changes were agreed with KPMG.

The logframe indicators are all quantitative, with the narrative report being used to provide examples of the Outputs. In each section below Outputs and indicators are discussed. Where relevant there is a discussion on the quality of indicators and the monitoring scales.

3.1. Output 1.

Strong knowledge and evidence base on anti corruption issues

22. As discussed in paragraph 20 above the Output indicators were already achieved by mid-term. This section looks at the contribution made to AC:DC Outcomes by the three main research activities: the use of international compliance mechanisms as a means of promoting demand-led anti-corruption; the revision of TI’s National Integrity System tool for the purposes of AC:DC; and tailor-made research initiatives by Chapters in Latin America.

23. Research followed up by evidence-based advocacy is TI’s established approach to promoting anti-corruption policy and practice; as such it took pride of place in the outputs of AC:DC at the outset, although with some adjustment in line with GTF’s demand driven rationale. The 2009 Annual Report gave research a full page feature under “Innovation” – alongside ALACs which, however earned less than half a page.

24. Over following years their positions were reversed, with increasingly extensive reporting of the ALACs – in part because the research programmes mostly finished earlier. All the same, within AC:DC, the ALACs had effectively eclipsed the more sedate TI research tools by 2013, thanks largely to the strong ALAC emphasis on reaching out
to a new constituency and giving voice to victims of corruption through often eye-catching campaigns.

**Box 1. Output 1 - performance against indicators**

<table>
<thead>
<tr>
<th>Indicator 1.1 80% of foreseen reports meet quality standards of external reviewer or regional department.</th>
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<tr>
<td>National Integrity System Studies were undertaken in Armenia, Georgia and Ethiopia. TI reporting, the MTR and regional coordinators recognize quality standards were met in 100% of cases. The NIS in Georgia is singled out as outstanding in quality by virtue of extended stakeholder involvement, results achieved by campaigning, and replication throughout the region.</td>
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</table>

UNCAC was completed in Armenia, and delayed by elections in Georgia. More generic work in Mexico was only funded until the component was discontinued within AC:DC.

**Indicator 1.2 80% of research undertaken by NCs includes recommendations to decision makers**

All research work by NCs included recommendations to decision makers at central, regional or municipal levels. Chile and Colombia focused on widespread dissemination of research results at community level.

**Indicator 1.3 Over 400 materials produced**

AC:DC 2012 reports the production of 413 materials.

**UNCAC - UN Convention against Corruption**

25. There were some unrealistic expectations around innovation, particularly concerning government compliance with international norm-setting tools like UNCAC. Chapters had little scope to enhance the process on the demand side – the main players being of course the UN and the national government. An attempt was made early in AC:DC by TIS to broaden stakeholder engagement and TIS engaged a consultant to design a new tool for CSOs interested in monitoring UNCAC. The attempted innovation was not however successful.

26. Of the two countries scheduled for UNCAC compliance, Georgia was postponed because of elections but Armenia, although delayed, eventually went ahead. The Chapter, in its final report, indicated success in government acceptance of certain recommendations from civil society. But TIS had long since decided that AC:DC inputs into UNCAC monitoring were not adding value as the UN worked on its own checklists. The Chapters engage in UNCAC with the support of a specialised Berlin-based TIS programme.

27. Until mid-term Transparencia Mexicana implemented an even more ambitious compliance-related research project, this time aimed at a system of indicators embracing all the international conventions ratified by the country – nothing less than an anti-corruption Central Monitoring System for Mexico. Government at a high level was
interested and participated actively, holding out the possibility of practical action to address weak areas of anti-corruption policy and practice.

**National Integrity System.**

28. AC:DC achieved exceptional results by refreshing a well-tried TI anti-corruption assessment tool, redesigning it jointly with the participating chapters, strengthening stakeholder engagement and close coordination of recommendations with advocacy campaigns.

29. TI's own tool, NIS, provides a framework for assessing the capacity to resist corruption in 13 key institutions of the state – or “pillars”, for example parliament, the judiciary, the police and the media. Early in AC:DC, participating Chapters including Armenia, Ethiopia and Georgia worked with the TIS research team in strengthening the crucial element of stakeholder participation and in particular the importance of dialogue with the government which is understood as the first step in initiating change.

30. The revised tool proved outstandingly effective in Georgia, partly because government was engaged at a high level and also because the NIS results were used for campaigns that were communicated widely with the public. Already at the field-testing stage in 2010, both Armenia and Georgia NC's were invited by government to take part in drafting anti-corruption laws.

31. TI Georgia and its CSO allies had been aware that safeguards against corruption in many key institutions were unequal to their task but were at a loss to know where to start advocating for change – each CSO knew its own area of expertise (e.g. political parties, public sector) but could not conceive the whole picture. The “pillar” approach gave them a framework; by pooling their skills the CSOs were eventually able to address all 13 pillars. TI Georgia is still reporting results at the end of AC:DC, including amendments to party and campaign finance law that would help protect opposition parties and their voters from abuse.

32. Both Armenia and Ethiopia completed and published the research but owing to a much less favourable attitude of government to civil society, were unable to capitalize on the recommendations that they made to the same degree. In retrospect TIS acknowledges that the increasingly limited space for civil society made Ethiopia a poor choice for AC:DC. Low government engagement and commitment also undermined the results of the NIS in Armenia, where there are plans to repeat the exercise in a programmed roll-out of NIS across the region.

**Research in Latin America: Chile, Colombia, Nicaragua and Venezuela.**

33. AC:DC created opportunities for Chapters in Latin America to extend evidence-based advocacy to municipalities. Building on a strong tradition of research on anti-corruption legislation (typically on Transparency, Access to Information and Electoral Reform), the Latin American countries opted for tailor-made AC:DC projects most suitable to their capacity and context. Government in Venezuela and Nicaragua is

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5 AC:DC Mid Term Report 2011, p 31: Mexico Self-Assessment. The Evaluation team was not able to follow up on the results of this initiative once TI removed the UNCAC monitoring output from AC:DC.

6 Unrelated to AC:DC but over the same period and using the same revised methodology, TI also undertook NIS research in 27 countries of the European Union.
generally hostile to governance initiatives emerging from civil society and Transparency Venezuela (TV) was prevented by central government from pursuing its long term interest in contributing ideas towards a Transparency Law.

34. The Venezuela Chapter effectively side-stepped central government altogether by developing a scored Index of Local Transparency for assessing the accountability of regional government and municipalities, thus developing a constituency for transparency at sub-national level. Similarly, by dint of persistent alliance-building and campaigning at local levels, the Nicaragua Chapter was eventually able to secure an Electoral Reform Law, against all the odds. As TI observed: “notably, difficult context does not appear to be a determining factor”. The quote referred to the early performance of the ALACs but is also valid for some research work.

35. Whether by accident or design work at municipal levels has also spread more generally across South American chapters. Transparency Colombia focused its research on a network of civic “observatories” that assess the degree of compliance by Municipal councils with reforms agreed by Congress to limit conflict of interest. The Chapter followed this up with extensive awareness raising through local radio.

36. In Chile the Chapter responded to the widespread perception that local government was the most corrupt institution in the country. A survey of over half the country’s municipalities found that citizen participation was low and corruption was not as bad as popularly portrayed in the national press. Chile Transparente responded by making its comparative findings on municipal services widely available on the internet and training large numbers of officials.

37. TI’s research and advisory services complement each other and are most effective when integrated within the business of Chapters. Successes in research-based advocacy were slow in coming which led the 2010 Annual Report to compare the apparent lack of progress in the very difficult contexts of Nicaragua and Venezuela, with the success of the ALACs. The more established of these seemed to achieve institutional reform on the basis of a single case, or a cluster of cases.

38. The explanation is that different approaches deliver results on different timescales; reinforcing the conclusion that advocacy built on evidence-based research (which tends to be slow) is often well matched with the faster pace of campaigns arising from ALAC cases. It took, for example, the best part of two years for TI Georgia’s NIS research to mature while a glaring conflict of interest over an important contract for the greening of Tbilisi was quickly resolved. Without the NIS, however, it is unlikely that the Mayor would have been sensitised to addressing corruption in high places. It was the detailed study of institutions that compelled politicians to accept that improving governance and transparency in Georgia involved more extensive reform than eliminating bribes by minor officials – petty corruption.

39. The different funding routes and management lines might have created greater separation between the work of the National Chapters and the ALACs. Early divisions between the ways of working seem to have disappeared with a recognition that the work is mutually reinforcing and is more effective where the ALAC work is kept within the national chapter.

7 2010 Annual Report AC:DC p 12
40. Argentina is a good example in Latin America of a Chapter that pursues its anti-corruption aims through a wide variety of integrated activities including an ALAC, municipal research, outreach, awareness raising and legal advice. Amongst the AC:DC “research chapters”, Nicaragua has also recently opened an ALAC to strengthen its coalition at the grass roots and Chile is also considering its own ALAC. An ALAC may prove to be an effective way of reinforcing Colombia’s applied research and awareness-raising in the future.

**3.2. Lessons**

41. The work of National Chapters and ALACs is most effective when they complement each other - the one researching the overall context of corruption and the ALAC illustrating the human consequences of it in the specific case.

42. Whether engaged in evidence-based research or ALACs, demand side approaches like AC:DC stimulate Chapters to engage with a wider range of governance institutions: e.g. regional government, municipal councils and communities. This also enhances effectiveness.

43. Where ALACs do not exist or are in their infancy, TIS should continue to ensure at least technical support is available for the start-up of ALACs.

44. Chapters should try to integrate the activities of ALACs within their strategies and ensure that funding is earmarked for sustainability (e.g. by including costs in applications for funding by donors).

**3.3. Output 2**

NC (capacity to) demand for improved anti-corruption policies and practices.

45. This output relates how the NC are using their research and case work to influence policy and practice. Changing policy and practice through advocacy is understood as coming from all AC:DC activities. This Output provided the opportunity for TI to strengthen the capacity of Chapters to carry out evidenced-based advocacy work. Throughout the AC:DC programme the direction of this Output has evolved to reflect changes in understanding about the intention of the Output and also about practice in the NCs.

**Box 2. Output 2 – performance against indicators**

<table>
<thead>
<tr>
<th>Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1. # of advocacy interventions increased by 40% in comparison with Annual Report 2009 during the life of the programme</td>
</tr>
<tr>
<td>AR2013 : 396 interventions compared to 84 in 2010</td>
</tr>
<tr>
<td>2.2. Acceleration of year-on-year average progress of advocacy interventions in comparison with Annual Report 2010</td>
</tr>
<tr>
<td>Average level recorded on data base reached level 4 : action taken</td>
</tr>
<tr>
<td>2.3. At least 40% of NCs have developed a comprehensive advocacy plan for a component of their sub-project by Year 3 (n/a)</td>
</tr>
</tbody>
</table>
2.4. At least 80% of NCs implementing ALACS have developed a fundraising strategy by Year 3 (n/a)

2.5. 80% of NCs pass the TI Members’ Accreditation Review process during the life of the project

2 Chapters, Nigeria and Uruguay were disaccredited during the programme

46. TIS accepted the MTR recommendation that the time was right to put more emphasis on advocacy to change policies and practice. As a result the 5 indicators, were reduced to 3 (2.1, 2.2, and 2.5). As the capacity building focused more on advocacy, indicator 2.4 in relation to NC fundraising was less relevant.

47. Indicator 2.5 in relation to NC accreditation was retained. The accreditation process focuses on governance of the Chapter rather than on performance in programmes or advocacy. More than offering insights to qualities or changes in relation to the programme, it is best seen as a proxy of Chapter capacity.

48. The lack of advocacy plans as per indicator 2.3 (which had provoked the MTR recommendation) was debated in AC:DC management and it was agreed that advocacy plans in themselves did not adequately reflect how the Chapters worked. The Movement does not only use NGO type advocacy campaigns which would require an underlying plan of action and targets. Advocacy in the Movement is interpreted very broadly and includes inter alia: awareness-raising in communities and the media, taking on public interest litigation cases as well as support to individual cases.

49. The second half of the programme therefore focused on improving the translation of evidence of corruption into advocacy actions and increasing the capacity of NCs for this type of work. Progress in the first two indicators register the number of advocacy interventions (as defined by the Chapters) and the rate of completion both of which are reported to have met and passed their targets. The changes which come about through these advocacy interventions are mainly reported as systemic changes at purpose level.

50. As with the other outputs the targets were surpassed. Although this represents an achievement, the numerical nature of the indicators, the target and the almost content-free nature of the scales used to measure progress, means that it is difficult to draw out lessons on what made a difference to Chapter capacity or what difference Chapter capacity made in the achievements.

51. It could be argued that increasing the number and speed of advocacy interventions (as described in indicators 1 and 2) need not lead to achievement of the Output in which NCs have greater capacity to demand better policy and practice. There are two principal difficulties: first, there is the wide definition of what constitutes advocacy work and,

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8 Indeed it is not obvious that the possession of an advocacy strategy, in itself, constitutes an adequate proxy for increased capacity to carry out advocacy work. TIS pushed for the development of strategies for a while, then realising this, tried a more practical approach (horizontal learning, advocacy and campaigning initiative).
second, the nature of much advocacy work which does not proceed at a pace that the programme can necessarily decide on. The Advocacy Scale as defined in the ALAC Database Users Manual follows a typical set of activities that would take place in a conventional building and delivering an advocacy campaign. However, the steps and stages and the timing of advocacy work are too variable to be easily programmed. The indicators therefore rely on averages from across diverse programmes and whilst it may remain true that more and faster work are symptoms of achievement they do not provide useful assessments of good performance or give proper credit for successes that have been accomplished by unorthodox sequences of activities or slower more patient approaches.

Change in NC capacity

52. A more focused approach to strengthening advocacy capacity included training from ODI, regional workshops, support from regional coordinators and the Speak Up event, where participants shared experience of ALAC and advocacy work and were encouraged to focus beyond cases to bringing about higher level changes and impact. Chapter advocacy was further supported by additional competitive funds through the “Advocacy Initiative” in year 4. None of these interventions have been monitored in terms of short and longer term impact on capacity of the National Chapter staff.

53. Changes in capacity are visible in the responses to the Final Evaluation online survey. All AC:DC NCs reported that the competencies of their organisation had improved during their work on the AC:DC programme. The results (see Table 1) are overwhelmingly positive in five areas of competency.

<table>
<thead>
<tr>
<th>Table 1. Increased competencies of National Chapters</th>
<th>Number of respondents (out of 32) claiming increased capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Researching issues/collecting evidence for advocacy</td>
<td>19</td>
</tr>
<tr>
<td>Targeting of advocacy work</td>
<td>24</td>
</tr>
<tr>
<td>Using communication tools or techniques for advocacy</td>
<td>20</td>
</tr>
<tr>
<td>Timeliness of advocacy actions</td>
<td>21</td>
</tr>
<tr>
<td>Raising capacity of citizens to engage in anti-corruption activities</td>
<td>20</td>
</tr>
</tbody>
</table>

54. The survey respondents included two from non-AC:DC countries and these respondents noted stable or in one instance reduced capacity in these areas.

55. The NC reports showcase examples where advocacy makes a difference to policy and practice. In discussions with NC staff during the course of this evaluation NCs identified what makes for successful advocacy interventions in their context. The illustrative examples below indicate the range of understanding about what constitutes advocacy as well as what is understood to work well.

Campaigns with CSO coalitions: TI Zimbabwe reflections on the ZESA campaign about electricity billing shows the importance of working with other CSOs that have the human and financial resources to keep their negotiations with authorities going. TI-Z’s role is that of a supporting organisation particularly in the provision of data that is analysed to show corruption.
Lobbying: TI Palestine lobbies those in positions of power to make changes in legislation. TI Solomon Island lobbied Parliament to revise MPs’ accountability for the Constituency Development Fund.

Writing letters: TI Nepal writes letters to the Prime Minister on the decision making process in a Hydro scheme and simultaneously publishes the letters.

Increasing public awareness by TI Pakistan of the issues through press releases, billboards, television advertising, investigative work etc. on case work issues and own assessment through environmental scans or political economy analysis which helps identify what can feasibly be addressed.

Legal case work including public interest litigation: TI Vanuatu supporting complainants in taking their cases through the legal system – in some cases going beyond the provision of advice on individual and public interest litigation. Support was provided to a campaign to against a company setting up a fish factory in a residential area, without the required environmental impact assessment. A case was taken to court and was stayed- no more action on the fish farm has been taken.

Changing practice by awareness-raising in the communities and in some instances local government service providers. For example working with youth groups in Zimbabwe and Palestine on what corruption is and what to do.

56. The ET finds that there is a good deal to learn from the experience of the NCs in their advocacy work; as was witnessed at the Speak Up event – however it is important to gauge how shared learning works its way into practice, as this would improve understanding about effectiveness in capacity building. A relatively simple process could be for participants to set their own change goals at the end of any peer to peer or training event and commit to follow up. In the spirit of collaboration participants could also request support from other Chapters where particular experience or expertise would help.

57. Overall such commitments to change would be managed by the Chapter and progress reported on in regular reports. Output 2 is not fully reported. It is therefore not easy to say what capacity interventions made a difference to the Chapters. The current belief across the Movement is that peer-to-peer capacity development is effective. With more evaluations of capacity interventions and follow up on actual changes in capacity in practice, this assumption could have been better tested.

3.4. Lessons

58. Case-based advocacy is potentially powerful and yet is not the only approach to advocacy in the National Chapters. The added value of case based work is the legitimacy it offers to NCs taking cases up with institutions as these are complaints starting with citizenry not the Chapter per se. There are instances where relatively few contacts, such as the Solomon Islands with fewer than 50 cases in 3 years, were apparently used to justify the NC decision to take on the issue of accountability in the Constituency development Funds.

59. National Chapters take on issues that come to their attention through their own research or other observations and those based on complaints presented at an ALAC.
The broader understanding and scanning of the context by staff in the NC are important especially given the potentially narrow demographic of complainants.

60. Indicators need to be used to show more meaningful changes; both numeric and qualitative. At the Purpose level the only explanatory data is via presentation of case studies which do not provide sufficient detail to enable wider lessons to be drawn on when and why advocacy is effective.

61. TI-S could consider using techniques like Process Tracing to interrogate both successes and failures in advocacy processes. Such methods would explore possible reasons for changes and the likely level of contribution of the different processes, including the role of TI.

3.5. Output 3
Public institutions and non-state actors engaged in the fight against corruption

62. The aim of including and working with Non-State Actors (NSA) and governments is to improve their own capacity and willingness to work for greater transparency and accountability and against corruption. There is an understanding that more agencies working on these issues is likely to be more effective; this is sometimes referred to by the phrase “critical mass”. Non-State Actors includes both CSOs and private sector.

63. As can be seen in the Box 3, the targets for this output were already achieved in Year 4 of the programme. The indicators depend upon how NC staff score their relationships with other agencies on the Partnership Scale. At the time of this evaluation not all country reports were completed and this report is based on data from the 2012 report.

Box 3. Output 3 - Progress on indicators

<table>
<thead>
<tr>
<th>Indicators</th>
<th>AR 2013 Non-state actor partnerships stood at 302 in 2012.</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1 # of non-state actor partnerships increased by 40% in comparison with Annual Report 2009 during the lifetime of the programme</td>
<td>AR 2013 Stable as between communication and cooperation</td>
</tr>
<tr>
<td>3.2 Increase, as appropriate, in overall average level of coordination, collaboration &amp; integration of non-state actor partners</td>
<td>AR 2013 State actors: average of 26 per country for a target of 8 in 2012</td>
</tr>
<tr>
<td>3.3 Average # of working relationships with authorities increased from 6 (AR 2009) to 8 by the end of the programme</td>
<td>AR 2013 Increase in 5 NCs, decrease in 1 and otherwise stable</td>
</tr>
<tr>
<td>3.4 Increase, as appropriate, in overall level of coordination, collaboration, integration of partnerships with public authorities in comparison with AR 2010</td>
<td></td>
</tr>
</tbody>
</table>
64. The recording of the numbers of relationships and movement along the Partnership Scale is understood by TI-S as a way for Chapters to share information internally and to provide an easily accessible record of changes in relationships.

65. The indicators have been adjusted to take account for the way in which they were initially seen as a scale which indicated greater achievement by making progress towards one end of the scale. It was realized that that this was not appropriate and that some relationships do not change their nature along the lines described in the Scale. It would not be appropriate, for example, to imagine that a National Chapter should aim to become “Integrated” with a government department. For this reason, the phrase “as appropriate” was added to two of the indicators which reduced their usefulness in assessing change. (See paragraph 211 for further discussion of the Scale.)

Working with Non-State Actors

66. Working with CSOs and in coalition is key feature of anti-corruption work and an important part of the history of many of the NCs (some National Chapters emerged from coalitions of CSOs). NCs also work with local organisations in their outreach work.

67. In AC:DC the strengthening of partnerships with local NGOs and CBO and in particular civil society coalitions is extremely important to TI’s work. NCs not only lead coalitions but also participate in others e.g. the Extractive Industries Transparency Initiative (EITI) in Papua New Guinea. The critical role is less visible in the reports’ discussions of achievements. Coalitions provide a form of protection for members especially where government are hostile as well as providing for a stronger voice.

68. TI staff in Kenya told the Evaluation team how the links to other organizations can serve simple purposes like facilitating the referral of complaints from the ALACs and also more nuanced roles in endorsing the presence and work of TI and acting as a sign of solidarity and common purpose. The function of expressing solidarity and spreading risk was mentioned by staff in other African countries also.

69. Many of the CSO and CBO relationships recorded in the reports are partners in outreach and mobile clinics – who are already established in communities who provide relatively easy access for TI awareness raising work. The scale on which NCs can reach out to communities is dependent on these relationships.

70. The media as well as social media are also evident in the long list of partnerships and in many cases NCs will work with the media to expose issues which are not getting the attention or a response from governments.

Working with Government

71. Government relationships have always been central to the way the Movement works, in particular in supporting the supply side which is central to the TI Movement approach to change. This approach depends on TI bringing some technical expertise and advice to government, in constructive rather than adversarial engagement. There are many ways in which this has been done in the AC:DC programme as illustrated in the examples below:

72. TI in Venezuela has trained government officials on compliance which appears to have generated changes in behaviours.
73. In Kenya, the new national constitution has changed power relations in local government and the TI staff are having to reassess their engagement with the new County structures.

74. Government in Fiji has had to respond to pressure: its laissez-faire attitude to Union members’ pension rights changed after an intervention by TI-F that made use of reports from the Unions. The intervention also prompted government to regulate the private sector.

75. In Vanuatu, the Chapter keeps a watching brief on the work of the Law Commission through new laws which are in process.

76. In some countries such engagement is formalized through MoUs between TI and government or para-statal authorities. In Pakistan, these lay out how the authorities will respond to corrupt behaviours. This approach has been used extensively and benefits a complainant who has a clear route to follow and a clear understanding of the form of response to expect from the authorities. The numbers indicate at least a willingness on behalf of civil society and government to engage with the fight against corruption. In Pakistan the Evaluation team found that TI-P’s training of people to write letters of complaint to the authorities elicited a good response rate.

77. As has been mentioned under Output 1, Chapters in Latin America faced with hostility from National governments have carved out effective relationships with CSOs and Municipal governments. This local engagement increased and developed with GTF funding.

78. In the case of Argentina the Chapter works on both sides: at times working with civil society to help them articulate their demands and with municipalities to help them with responsiveness. This shows a versatility and understanding of where bottlenecks to change are. They are careful to use these potentially opposing strategies in different geographies.

79. The diversity and capacity to work with both the demand and supply side on challenging corruption is seen as a strength of the NC ability to choose approaches to fit the problem.

80. The AC:DC programme has successfully formalized a key approach of working with and through partnerships. Although some National Chapters had their roots in coalitions often their research and other work was carried out alone. The AC:DC brought much greater involvement with individual citizens and a more deliberate approach to partnership. Working in partnership is underpinned by a theory of change that more coalitions and partnerships are better able to bring about change. The ET heard a wide range of explanations of the usefulness and effectiveness of partnerships and staff clearly have a good understanding of the different benefits that working with other agencies can bring. The benefits are different in different cases and change over time.

81. Output 3 tried to assess how working in partnerships leads to higher level achievements but the indicators record only numbers of links and only some aspects of the nature of the relationships. This does not capture the knowledge and learning that staff have of the value of being in partnerships nor the risks of acting alone. Essentially
the indicators do not help staff to report what the partnerships are for (the purpose) and on how progress has been made towards the purpose. It is clear that in some cases this might be difficult; for example, in expressing increasing levels of trust or a greater sense of solidarity, but monitoring should still focus on the purpose of the work. Being difficult is not a reason for not trying to assess changes in what matters. Setting out with a clear idea of what is desirable and fit for purpose is important. TI may consider a clearer distinction between relationships based more of what they expect to achieve. Reporting on whether the purpose is achieved gives a fuller understanding that Chapters’ relationships are supporting the achievement of Chapter aims. There will always be some relationships that don’t need to change or progress along the scale but in the case where Chapters are actively nurturing strategic relationships it is worth monitoring how effective they are in relation to their purpose.

82. It is also true that it might be difficult to aggregate changes in relationships where the purposes of relationships are extremely variable and where Chapters should have the freedom to create and work on partnerships on a case by case basis. It is another example of the challenges facing a global programme in reporting on key issues of achieving change in the best ways in highly different circumstances. However, the need to demonstrate what works and what does not work remains central to the purpose of the GTF.

3.6. Lessons

83. In AC:DC the strengthening of partnerships with local NGOs and CBO and in particular civil society coalitions is extremely important to TI’s work. The importance covers a wide range of relationships which are understood by staff but not monitored by the indicators for this Output.

84. Strategic relationships with CSOs at various levels between universities/study centres and CBOs are essential in order to achieve TI’s demand-driven anti-corruption agenda.

85. NCs should continue to develop strategic partnerships with specialist and community based organisations to enhance reach and effectiveness and maintain, a traditional strength of TI, the constructive engagement with government. It seems important to acknowledge the mixture of Supply and Demand side approaches of the National Chapters and ALACs and the need to reinforce work on both sides.

86. The achievement of this Output and the way it is reported does not contribute to learning about management of relationships with CSOs or Government in promoting change in practice and policy.

87. The review of this Output helps to point out how difficult it is to create management tools for a truly global programme which requires subtle adaptation to local contexts in order to achieve change in the best way possible in each particular set of circumstances. The monitoring should nevertheless help identify what works well and less well in order to support learning about anti-corruption and transparency processes.

88. The solution is not to constrain programmes with narrow rules but to allow Chapters the flexibility to choose from all available tools and make the most of the judgment of their allies to achieve change in the best way possible and assist them to deliver effective monitoring of how and why change was effectively supported, or not.
3.7. Output 4
Empowered citizens and communities who engage in and pursue anti corruption activities

89. This output focuses on engagement with citizens and communities through the ALACs and outreach work. This is where the paradigm shift in the Movement is most visible as previously there had been little contact with citizens. This change, which started in 2003 with ALACs in Eastern Europe has been spread through the AC:DC programme with 15 countries operating ALACs and in some cases, Palestine, Rwanda, Kenya etc, opening more branches. The effort involved in getting these up and running across these Chapters is significant and at MTR the ALAC promise was seen as yet unfulfilled and recommended more outreach to gather potential clients and cases and improve reach to women and vulnerable groups.

Box 4. Output 4 – Progress towards indicators

<table>
<thead>
<tr>
<th>Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1. Increase in 40% # of MALE and FEMALE new contacts and cases opened year-on-year during lifetime of programme</td>
</tr>
<tr>
<td>The targets have been met for men on a year by year basis from a very low starting point. The 2013 Annual Report states that the increase in new contacts (complaints) and cases surpassed that of the projected rate of 40% registering a total of 27,092 by the end of year 5.</td>
</tr>
<tr>
<td>This included 36% female contacts compared to 27% in 2012 and male contacts about approx 60% compared to 67% in 2012(^9). The number of cases opened in the final year was 3832.</td>
</tr>
<tr>
<td>4.2. # of MALE and FEMALE, young and elderly, participants at community engagement events</td>
</tr>
<tr>
<td>4.3. # of participants at outreach activities, disaggregated by gender and age</td>
</tr>
<tr>
<td>Disaggregated data not available, but approximately 31 000 people were involved in outreach events in the 5th year in 8 countries.</td>
</tr>
<tr>
<td>Indicators 4.2 and 4.3 were introduced in 2011 in response to comments in the MTR but were simplified as it proved challenging for NCs to gather data about disaggregated numbers for larger outreach events. Disaggregation by age was really only possible when NCs targeted a specific “age group” e.g. Youth. TI acknowledges that some countries disaggregated data by gender but not all.</td>
</tr>
</tbody>
</table>

90. This is another example where the attainment of the quantitative indicators does not necessarily add up to the achievement of the Output. The question of whether citizens are empowered is only partially answered by the targets set in terms of their participation in events or making contact with an ALAC. This is an observation on the

\(^9\) The category of unknowns accounts for this not making 100%
use made by management of the logframe (both by TI and by KPMG) and does not reflect on the quality of practical work done in the programme.

91. The number of complaints received by ALACs has increased over time in part as there are many more ways in which complaints can be made. For example, in Zimbabwe, the SMS platform led to a massive increase in complaints being received. This volume was difficult for the small legal team to process. The main and perhaps unexpected benefit of the scheme appears to be that the NC now has numbers of people willing to make complaints and this will help with targeting of awareness-raising. In Palestine over 90% of complaints received by the ALAC are not related to corruption. These are referred to other agencies as appropriate. They are documented but are not systematically analysed. Actual corruption cases tend to be between 60 and 80 per year.

92. The MTR made a number of observations on the numbers of complainants and equity in terms of location and gender and made a recommendation about increasing the accessibility of ALAC services. In response, many ALAC offices ran Outreach activities. In several countries, ALAC legal staff run mobile clinics at community events. In other places ALACs train community structures as a point of first report and referral. The use of community based monitors seems effective in explaining the role of the ALAC and recruiting complainants and clients.

93. Zimbabwe trained Accountability Monitoring Committees who are volunteers and are able to direct people to the ALACS. In several countries, new technology is being used to experiment with ways of making a complaint including the use of toll-free numbers and SMS platforms. The Evaluation team applauds these efforts and we are of the opinion that new technologies will be increasingly important in advocacy and lobbying work.

94. The number of women reporting started off much lower than men and resulted in a recommendation in the MTR that more efforts need to be made to make it easier for women to report. There have been increased efforts to raise awareness amongst women's groups and also to raise the profile of cases which might be of interest to women. Many Chapters explain that culture and tradition dictate that men do the reporting to public officials and TI recognises that this is important to take into account when looking at the figures.

95. The figures show that more people are making non-corruption related complaints. For the TI Movement: making a complaint is understood as the first step in a citizen showing they are willing to do something about corruption. It provides TI with an opportunity to explain what corruption is and in some cases people can be referred to appropriate agencies. These complainants are expected to have a better understanding of their rights and this is an early impact of the programme that may lead to greater changes.

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10 Some Eastern European Chapters argue that dig deep enough and a corruption issue will be found.
96. The raw data give a very positive picture of progress both in the numbers and case studies presented\(^\text{11}\). Given the relative newness of the database the Chapters are not yet interpreting the data fully. There are two issues regarding the interpretation of data which are mentioned here as an indication of the further promise of the data base. These are:

- Gender issues in a complaint as being more important than the gender of the complainant;
- Better understanding of transition rates from complaints to cases.

Improving understanding about what the nature of the issue is, and the degree to which people that come to ALACs (following awareness raising sessions) are well informed about corruption, not only provides feedback on the quality of outreach, but also indicates shifts in understanding about the role and function of the ALAC.

97. It is acknowledged that the database is still a relatively new tool but the test of its usefulness is in providing data which NCs can analyse and use to make decisions. Some analysis does happen where there are many complaints about a single issue; for example, in Zimbabwe carers of Orphans and Vulnerable Children (OVC) complained that funds from a government scheme to help with OVC’s education were regularly given to non-OVCs by head teachers. The accumulated complaints became a case taken up with the authorities and donors involved in the scheme.

98. The ET finds several meanings of the concept of empowerment. In the simplest case the empowering activity is delivery of information which the individual may choose to act on: both for a complainant being provided with information on what corruption is; and, for a client being provided with advice on how to take a case to the authorities.

99. The ALAC Start-Up manual provides a conceptual framework which defines behavioural change through five stages in a scale from “There is no problem” through to, “I am willing to demonstrate the solution to others and advocate for change”. The manual states that “all ALAC interventions seek to move citizens [along this scale]”.

100. The indicators for Output 4 do not adequately reflect behaviour changes that citizens might make. Figure 1 gives a diagrammatic version of the possible sequences of events following the presentation of a complaint at an ALAC. Currently clients are asked for immediate feedback on their experience of visiting an ALAC (as in cells 1, 2 and 3). The responses are overwhelmingly positive and the programme is to be congratulated for this. It would be very interesting and useful to get feedback some time after the complaint was made on changes in understanding and motivation (as in cells 4 and 5).

101. It is not anticipated that the ALAC work alone would lead to the selection of an advocacy focus (cell 6). The ALAC manual does say “advocacy issues are essentially determined by citizens and clients” (Section 21). But in practice, additional intelligence and assessments are brought into the decision making, including *inter alia* the sensitivity of the target for advocacy.

\(^{11}\) Note that average figures for complaints disguise the huge differences in numbers in different countries (e.g. in Y4 Liberia =138 and Rwanda =3,456).
The database records changes in rights awareness during the advice giving process and the final part of the process asks about satisfaction with the quality of the service provided. In addition there are at least two examples of NCs carrying out client satisfaction surveys: In BiH an on line survey was used and in Rwanda a questionnaire and interviews were conducted. Both these surveys provide an insight into what clients felt about their experience. In the case of Rwanda 86.5% were satisfied with the support they received and 89.1% said they spread the word about ALACs in their communities. Both are impressive and useful in terms of showing that the ALAC service is effective. What these surveys don’t provide is an understanding of what clients did with the advice received and in turn what difference this made to them.

103. Given the expectation that clients are empowered through their contact with ALACs, it would seem to make sense to move beyond assessing client satisfaction to looking at a sample of client actions using a scale which looks at degrees of empowerment such as: I understand my rights better or I am able to take the case forward myself – both of which could be understood as evidence of empowerment.

104. As an alternative to online survey, there is potential for more regular and direct contact with consenting clients, some weeks after the visit. This would provide the ALAC staff with monitoring information on the usefulness of their referrals and some ideas on how people take forward their concerns. Currently there is no formal system for knowing what happens when complainants are referred. The 2013 report classifies outcomes in 35% of cases and complaints as unknown. Although complaints are generally referred it remains important for Chapters to know whether people are being properly treated by referral agents. At a minimum this will influence whether people go away feeling it was worth going to report to Transparency in the first place. Similarly, following on from the consultation and advice giving, it is not recorded how clients feel their attitudes may have changed after they are helped with their case by the ALAC - which is not quite the same as understanding the results of the cases once they are taken forward.

105. It would almost certainly be valuable to know these things: partly to report on the behaviour changes that are targeted by the ALACs and partly as a way of learning about how best to approach different forms of corruption. **Outcome Mapping** may provide a way of looking at changes in the people that the programme has direct contact with and without adopting Outcome Mapping as an entire approach it might be possible to take some of the ideas for assessing different degrees.

106. The current monitoring scales do not attempt to assess behaviour changes although this is fundamental to the changes which TI and ALAC aim to promote. Understanding of what happens in cases will help understand behaviour changes on both the demand and supply side of corruption.

107. Learning more about what happens after people contact with an ALAC would also help test a common belief amongst the ALAC staff that an increased focus on more marginalised and vulnerable people means that more resources are required to support them. The classic middle class urban male is perceived as better able to take their own cases forward. These ideas could be checked not only so that ALAC staff knows more of what happens in cases, both successful and unsuccessful, that are taken forward without further involvement of the ALAC but also in order to assess the resource requirements of different potential engagement approaches.

108. It would also be valuable to follow up with complainants and clients to see when they go on beyond their own specific case and help others to fight against corruption either as individuals or as community organisers. If there is a long term expectation that citizens become more active in the fight against corruption it would appear necessary to take a closer look at what it takes for individuals or communities to take these additional steps. Case studies provide interesting insights but they do not provide sufficient insight into what really drives people to want to do things differently.

109. The ET is aware that such work would require resources but only a small sample of complainants need be followed up and new media may make this relatively inexpensive. There is a range of practice across the Chapters with some more involved in the process.
of developing the case and supporting the clients and in other Chapters people might be helped with letter writing and expected to take it forward. The differences in the results achieved by these different approaches could contain valuable learning.

110. A significant case of communities being empowered (which may not get reported under this output) is in Argentina where TI worked with a group of slum dwellers to successfully petition government to recognise them as a community and as a result avoided eviction. The capacity to respond to local demands is essential however over time and in a more resource constrained environment developing understanding about what works when and why would help effectiveness overall.

The Zimbabwe Chapter Executive Director: *We used to hypothesise about what corruption looked like now we can see what people are facing and we can do something about it.*

111. The impact of the ALACs on the participating Chapters is without doubt significant and a tangible contribution to the systemic changes recorded below.

### 4. FINDINGS 2 – PURPOSE AND GOAL

112. The headings used in this chapter underline the fact that the logframe was not updated when the Revised Logframe format was introduced by DFID in 2009. The main difference is that in the new version Purpose and Goal were replaced by Outcome and Impact. This is not a TI-specific issue but was a decision by the grant manager not to request grant holders to change the logframes to the new version.

The Purpose is to **promote evidence-based anti-corruption policy and practice by public and non-state actors.**

113. Contribution to the Purpose comes from all AC:DC interventions: research, ALACs and political work. Together they contribute to policy change that is evident in institutions, legal frameworks, codes of practice etc. Practice (and behaviour) change is expected from government and non-state actors which include communities, individuals and organisations.

114. There are four indicators at Purpose level: the first two are quantitative and look at numbers of policies influenced and Movement on the policy change scale:

- **A.1.** Overall # of changes in policy and practice increased by 40% in comparison with Annual Report 2009.
- **A.2.** Level of change in policy and practice increases in all countries from initial levels of "no change" or "n/a".

115. The indicators make it clear that the improvements in policy and practice are what is sought and the earlier formulation of the Purpose “**More effective policy and practice to**

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13 The language is unusual for a Purpose statement which more normally would described an achieved state (lower levels of corruption) rather than a process (to promote)
14 A fourth indicator relating to an increase in the return of UNCAC checklists was abandoned in the third year of the project as it became apparent that the UN were developing their own methodology for the UNCAC review process and that TI inputs would not add value. This change was agreed with KPMG and the indicator is not discussed in this report.
address corruption...” was more accurate than the revised version which focused on process (to promote) rather than an achieved state.

116. The first two indicators raise significant problems in terms of attribution or contribution since increased numbers of changes in policy and practice can occur independently of TI activities. In fact, changes in policy are notoriously difficult to predict and almost always take several years to take place. There would be very important differences between the situation where a National Chapter starts work on a completely new change in policy and where it takes up work on a policy issue that has been running for some years. There would also be a much slower rate of bringing about policy change if the policy focus was to be determined by an analysis of issues being brought to an ALAC. This is understood as a general challenge in the TI Movement and consequently in its systems for monitoring change.

117. The third indicator:
   A.3. Verifiable evidence of NC recommendations being implemented through policy reforms and observed changes in practices by public and non-state actors.

This relies on stories from NC which reflect their contribution to policy and community level changes. The third indicator directly addresses the attribution issue by requiring a link between NC recommendations and policy or practice change. This makes clear what is understood in the other two indicators by making the links clear between work done by a NC and changes in policy raise other issues.

118. At Purpose level the reporting on indicators one and two is based on quantitative data drawn from the NC’s data bases from which averages are drawn. All reports and guidance from TIS on the use of the systemic change scale to record depth of change is not intended to produce a value judgment on the level of change. “While change is more generally difficult to achieve as you go up the scale, even a change in discourse may represent a significant achievement in certain contexts”15.

119. The first Purpose level indicator on numbers of changes reached 174 in 2012 and 219 by 2013 well over the target of 68 in the logframe. The second indicator tracks the level at which the policy changes have reached and for the global programme looks at an average across all the policy changes. In 2013 the average is at the third level of policy adoption.

120. The MTR critiqued the criteria and use of scales and the ET revisits this in paragraphs 209-216. At this stage it is important to register the following:
   • The current use of the scales is not really as a measurement tool: reporting on a shift along points on the scale or in some case back down the scale might provide a better indication of actual changes.
   • NC averages which in turn inform the global averages do not provide insight into country level progress and do not register as changes in the World Bank indices being used at goal level.
   • The scales do not reflect the degree of contribution or influence of NCs. The narrative reporting tries to do this but as stated above the presence and contributions of CSO allies, for example, tend to be less visible in reporting at this stage.

15 ALAC Data base- Users’ manual p25
121. This is not to suggest that the NC have not made important contributions to policy changes across most of the countries of AC:DC operation. There are many strong examples, widely reported, where the Chapters are contributing to improvements in the anti-corruption institutional frameworks though improved legislation; regulation; codes of conduct and other mechanisms which have potential to increase accountability. In the examples the reports do not tend to interrogate the NCs actual contribution to change.

- In Georgia the NIS research has influenced the public sector reform agenda and a variety of new legislation has been put in place.
- Increased access to information e.g. Freedom of Information legislation, national anti –corruption strategies ; political integrity pacts and declaration of interests.
- Greater protection for whistleblowers (e.g. PNG, Rwanda).
- New complaints mechanisms for public services such as police, health service, land departments, commerce, even the finance ministry in some countries.
- New codes of conduct for public and elected officials.
- Procurement regulations (Pakistan, Montenegro and Georgia) are a key focus and the agreements with public bodies increase transparency in bidding processes.
- Greater accountability is visible in Venezuela and Colombia in local government levels. TI NC are providing support to organisations monitoring Municipal decision and policy implementation.
- Election integrity monitoring in Kenya through voter social vetting.
- Public interest litigation in Vanuatu.

122. Although there are numerous examples the majority relate to change in policies, regulations and legislation. This is the natural territory of NCs and clearly knowing about changes in behaviour and practice is more difficult. Likewise there is limited discussion of how new laws and policies will actually make difference and to whom. While the changes in law have potential to increase transparency and accountability the real change comes from actual usage and application of these laws. Although there is some potential to influence “implementation” through informing people of new rights in legal framework, in general, monitoring of operationalisation is not done by the Chapters. The evaluation team acknowledges that actual operationalisation is beyond the limits of responsibility of the TI Chapters. The capacity of TI NCs to follow up on implementation is not limitless but understanding practice is important for learning, impact and sustainability.

123. The examples of change in actual accountability practice are less reported partly because the Chapters do not necessarily access this information. Given the limits of capacity and responsibility the ET found approaches to encouraging application of new laws etc. being done in various ways:

**Creating a constituency amongst the people affected:**
The Zimbabwe visit provided insight into the challenges in changing practice through changing regulations: The abolition of fees in rural maternity units was reported as a successful outcome of using evidence from ALAC complaints about additional fees being requested by staff. The Health Ministry agreed to make changes to fees and

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16 2011 Captive Mothers TI Zimbabwe
undertook a wider investigation into management of clinics. While this achievement was reported in 2011, more recently new complaints indicate that instead of asking for cash, at some clinics health workers are requesting for payments in kind – food or other goods from the poor mothers. Staff may think they have found a way around the new rules but fortunately the mothers are still reporting.

Collaboration with CSOs:
A second example from Zimbabwe is that of the campaign on electricity billing, in which TI-Z provided the complaints data to a collaborating active community group who are now negotiating with the ZESA on how best to reduce the corruption. TI-Z maintains a watching brief on the progress being made but is not directly involved. Their relationships with wide civil society allows them to provide input and support necessary while not committing resources to the follow up. AMAN the TI-Chapter in Palestine led a coalition of CSOs to demand greater inclusion of citizens in budget processes and making budgets more transparent.

Raising awareness
TI-R contributed to the development and parliamentary debate on Whistleblower Legislation as one of the pillars of the Government of Rwanda’s Zero Tolerance to Corruption since 2009. This passing of the law was registered as a success towards the end of 2012\(^\text{17}\). Although it is early days the NC acknowledges that this law will not automatically translate into a willingness amongst people in Rwanda to report corruption. In this scenario TI-R is raising awareness about the law to persuade people that it is “safe”. So far there have been no whistleblowers in Rwanda.

124. These cases illustrate the challenge of making sure that TI achievements translate into benefits for the wider community. In Zimbabwe the successful intervention of TI-Z may be understood as creating a constituency amongst women who successfully challenged corruption. In the case of Rwanda – the highly technical inputs from Chair of TI-R while valuable require significantly more effort on the part of the NC to ensure people are willing and able to use the law.

125. There is recognition in TIS that the project would have benefitted from a few impact studies. Although it came late in the programme, the GTF request for a write up of the “Most Significant Results” (MSR) will provide some impact answers but is more likely to be at the same level as the case studies, with some additional efforts to show who actually benefitted. The MSR outline provided by GTF usefully starts with the ToC but the overall purpose is more oriented to satisfying DFID’s evidence based results and VFM interests rather than understanding what lies beneath practice changes and what contributes to behaviour changes.

126. It is recommended that future programmes include impact studies that go beyond the case study approach and look at actual changes in practice and behaviour in order to provide insights and learning for the Movement. They might address some of the following questions:
- What factors contributed to a successful (or unsuccessful) process?
- What was the influence or contribution made by the Chapter?
- Who is holding who to account?

\(^{17}\) www.article19.org/pdfs/analysis/rwanda-whistleblowers.pdf is one of the other organisations that support whistleblower protection legislation
- Who is benefiting?
- What is the nature of the benefits?

4.1. Goal
127. The AC:DC Goal is to improve standards of governance, levels of transparency and reduce corruption in 25 countries.

There are two Goal level indicators:

**Voice and Accountability:** Levels of perceived citizen’s influence on governance institutions and processes improved (Average of 23 countries WBI indicator improved more than 0.3 points compared to 2008).

**Control of Corruption:** Perceptions regarding corruption in the country reduced (Average of 22 countries WBI indicator improved more than 0.3 points compared to 2008)

128. The Goal level indicators follows a logic from the Purpose level indicators which states that if changes have been made in policy and practice then governance will improve and corruption will be reduced. The logical step requires a wide range of conditions to be fulfilled but the Assumptions column mentions only “Political will and government capacity” and “Public perception changes”. Political will is not a helpful phrase and overall the Assumptions column does not give an accurate impression of the acute and nuanced understanding of political change that most NC staff possesses. In fact this is a common weakness in logframe usage and the Risks and Assumptions column, in the experience of the evaluation team, is the least well used part of the logframe.

129. As has already been stated the evidence of changed accountability at Purpose level is not strongly presented in the experience and selective impact assessments would add value. The transition from new systems to new practice is not straightforward. There is a further recognition that these WB indicators are not sensitive to the changes which are being delivered by the AC:DC programme at country level nor have they been used by Chapters as a reference point. This understanding is already partly reflected in the new People Engagement Programme logframe which has as its purpose increased responsiveness by government to citizens.

**Limits of responsibility**
130. It would be helpful for future programming to make better use of the logframe Risks and Assumptions section and make it clear where the limits of responsibility that programme staff assume for the results of programme work. In earlier uses of the logframe the Goal statement was presumed to be an aspiration beyond the responsibility of the programme. In programme planning, the results become increasingly less easy to predict and control. The further along the results chain, the less control the programme has over the achievement of results - Kate Dyer, Working with Log-Frames and Outcome Mapping in the Context of the Accountability Tanzania Programme (AcT) 2013.

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18 Some of these indicators are used in the GTF logframe and there is likely to be similar challenge in showing contribution in the whole GTF portfolio.
19 The further along the results chain, the less control the programme has over the achievement of results - Kate Dyer, Working with Log-Frames and Outcome Mapping in the Context of the Accountability Tanzania Programme (AcT) 2013.
of their own lack of control over high level changes. The current drive for evidence of impact works against such an intelligent and honest approach to planning.

**Key lessons**

131. There is recognition in TIS that the project would have benefitted from a few impact studies. In future programmes it is recommended that impact studies go beyond the case study approach and look at actual changes in practice and behaviour so as to provide insights and learning for the Movement.

132. Future programming could make better use of the logframe Risks and Assumptions section and make clear the limits of responsibility that programme staff assumes for the results of programme work.

5. **FINDINGS 3 – RELEVANCE AND TARGETING**

133. The selection of national chapters to take part in the AC:DC programme went through several cycles of decision making and was based on a number of criteria. The initial selection had to be based on expressions of interest and proposals from NCs in 2006.

- The aim was to cover all four geographic regions of TI activity: Africa and the Middle-East (AFME), Americas (AME), Asia-Pacific (AP) and Europe and Central Asia (ECA).
- The criteria for selection included an assessment of:
  - Major governance issue that can be addressed by anti-corruption work;
  - Environment conducive to change, and,
  - NCs that demonstrated that they had the capacity to deliver.
- TI also wanted to include a range of different contexts for ALACs to provide useful learning from situations perceived to be easier and more difficult.

134. The majority of proposals were based on working with the ALAC approach although a number of proposals from NCs in Latin American were in more traditional TI territory of research which could be used to influence policy and practice. At inception the more research oriented work was described as Research, Stakeholder & Implementation (RSI) which included National Integrity System surveys (NIS), UNCAC Gap Analysis and research on corruption in political processes in three countries.\(^{20}\)

135. During the life of the programme some countries dropped out. This was either due to losing their accreditation in the Movement (Uruguay and Nigeria) or because the space for civil society work on corruption was perceived to be such that the proposed work was considered no longer appropriate e.g. Ethiopia.

136. Coverage of such a large number of countries: 15 ALACs (13 new) and 9 research-oriented projects was an opportunity for the TI Movement to spread the more people-oriented approach which had started in 2003.

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\(^{20}\) Political Party and Campaign Finance, Conflict of Interest, Regulating Lobbying, Implementing the Nominal Vote will be conducted in three countries, followed by advocacy efforts. AC:DC inception report.
137. The resulting AC:DC programme involved combining research and advocacy with service provision to victims of corruption and this made good sense for the Movement but it made it more difficult to describe and monitor as a single programme. The different Outputs were not easily combined and a mix of different indicators is required to describe achievements in the different areas of work. For TI the different approaches contribute to the overall purpose of systemic change that underpins the work.

138. The division of the AC:DC funds between 26 countries meant that the amount of funding for each country was relatively small. It might have been possible to design a programme with fewer countries which might have provided the advantages of larger scale programmes, a lower management load and the potential to provide more support to each of fewer country programmes. However, the decision to spread the funds more thinly enabled learning from a wider variety of circumstances. It also created significant numbers of AC:DC programmes in each region which increased the potential for sharing approaches and skills within regions. For example, in the Pacific new staff in the Solomon Islands NC was able to do some of their induction training in Vanuatu. In some countries, e.g. Zimbabwe, GTF funding came at a time when other resources were coming to an end and may have been important in maintaining the work in the country.

139. The relevance of AC:DC programme activities in each country was determined by analyses at national level of opportunities and needs. In fact, many country programmes were based on the use of the ALAC model and in many countries this fitted with the absence of legal advice services or established complaints mechanisms through which people could channel their complaints. In some Latin American states there was an initial reluctance to work with ALACs mostly due to a lack of fit with their existing research and advocacy approaches and also, in some cases, concerns about sustainability. The ALACs have however been seen to be a potentially useful addition to a more conventional TI programme and have become widely accepted.

140. Overall the ET finds the selection of National Chapters to have been done in a way that took account of the NCs’ interests and capacities and created a programme with considerable diversity and the potential to provide useful learning and sharing of learning within regions and across the entire Movement. The mix of research and advocacy approaches with the ALAC approach created difficulties in reporting on the programme at a global level but global aggregation of diverse observations is always problematic.

5.1. Reducing Poverty
141. The overall impact level statement in the GTF programme logframe indicates that changes in Government capability, responsiveness and accountability should be related to the needs of poor people. This makes sense given the DFID mandate to reduce poverty. It would, however, have been entirely justifiable to regard the GTF as a learning programme in which evidence of impact on poorer people of different approaches to reducing corruption would have been a valuable contribution.

142. The AC:DC logframe includes some of the high level indicators from the GTF framework but overall the TI approach and principles do not focus explicitly on poverty reduction in their global work and poverty or vulnerability are not a specific target in the AC:DC programme.
The issue of targeting vulnerable and disadvantaged people was raised in the MTR and recommendation 6 suggested a more systematic and strategic approach to targeting issues which would have more of an impact on poor people. The initial TI reaction was to point out that reducing corruption is a public good with benefits for all citizens but with potentially greater benefits for poorer people. This argument was not taken to completion in the correspondence after the MTR. In practice TI maintained its position that poor people suffer more from corruption but also went on to promote more outreach work by ALACs and began to record the level of vulnerability of complainants. The inclusion of gender and vulnerability as part of the People Engagement Programme is an indication of the TI Movement’s desire to be more relevant to poorer people.

**5.2. Targeting and Poverty focus**

TI also modified the database to make it possible to register degrees of vulnerability of complainants. The vulnerability criteria are rightly developed locally and degrees of vulnerability are based on the number of vulnerability criteria met by individual complainants. Given contextual variations of vulnerability it is not possible to compare degrees of vulnerability between complainants in different countries. However, it is possible to compare the proportions of low, medium and highly vulnerable complainants that are being seen in ALACs in different countries. For example - Pakistan and Zimbabwe have the highest number of contacts in their high vulnerability categories at 64% and 47% respectively. Rwanda only registers 4% of contacts in its high vulnerability category and half are seen as average vulnerability despite the number of district ALACs and outreach work carried out.

Recent data suggest that identifying and registering client vulnerability is not easy and some ALACs are not registering it all; e.g. Nepal and Vanuatu. Argentina records 82% of clients as having unknown vulnerability. Zimbabwe and BiH have the lowest percentages of unknowns at 4% and 2% respectively.

The introduction of the concept of vulnerability to the Movement has encouraged staff to think about who is benefitting from their work and this is observed in the online survey responses. For example, responses to the question about reasons for prioritising cases include:

1. A common issue for many citizens 58%
2. Issue affects the most vulnerable 53%
3. Ability to achieve impact 47%

A focus on the more vulnerable is illustrated by Zimbabwe’s work on fees for maternity care in government clinics – where patients were being asked to pay bribes before being allowed to leave with their newborn babies. Evidence based on complaints made about government clinics received at the ALAC was presented to the Ministry of Health who subsequently removed all fees. The rationale for TI-Z was that this case: affected many; only poorer women use the government clinics; and the likelihood of success in the Ministry of Health, which received direct support from UNICEF and other funders, with the aim of reducing infant mortality.

The position that ALACs should be open to all was reinforced as a principle underlying the approach that the service should be demand-led. TI went on to encourage more outreach to increase access to the ALAC services. There are clear issues of access in a process which relies on people coming forward and bringing their complaint to an office...
in a city. TI staff are aware of this from their early analyses of complainants which showed a significant predominance of urban, “middle-class” males.

148. Since the MTR more NCs have carried out outreach activities, not only Chapters with ALACs, e.g. Argentina - some of which target isolated or excluded communities. Relationships with local CBOs with specialist and local knowledge make sure these outreach meetings are able to target women and youth. The aggregated programme wide data show a shift in the ratio of complaints from urban to rural during the second half of the programme in some countries and an increasing number of women making complaints during the same period.

149. The data on urban and rural sources of complaints indicate the impact of the outreach work: in 2010 55% of complaints were from urban areas and 18% rural whereas in 2013 this had changed to 46% rural. Although this does suggest ALACs are reaching out it should not automatically be conflated with reaching a more vulnerable population.

150. The data still need to be interpreted, for example, in some countries the incidence of poverty or marginalisation is higher in urban slums or informal settlements and an urban bias could also be a poverty bias. Some Chapters are however targeting more vulnerable communities, for example: displaced urban dwellers from Harare townships.

151. It is also important to understand the relationship between the status of the person making the initial complaint and the status of the final beneficiaries of cases that are concluded successfully. There are situations where, for example, men report cases on behalf of women or where poor people benefit from reduced corruption which comes about following a complaint made by a well-off person.

152. The usefulness of recording vulnerability is yet to be proven as the data do not appear to make it easy to carry out the interpretation of the links between the status of the original complainant and the status of those most affected by the corruption being reported. TI recognises that in general NC capacity to analyse the data in relation to these issues remains weak and the decisions on which cases to pursue are made without those analyses. TIS plans to address this data analysis capacity issue in coming months.

5.3. Gender

153. It is sometimes difficult to generalise across a global programme and in most situations (e.g. Pakistan and Solomon Islands) men bring forward cases more easily. However the overall number of women clients has doubled proportionately from 18% in 2010 to 36% in 2013. There are country programmes (e.g. Rwanda and Zimbabwe) where efforts are being made to make gender issues a focus of the programme. Nevertheless it is generally true that women find it harder to report cases than men and AC:DC programmes should include a gender element in their design (how cases are chosen to be taken forward) and in their reporting.

154. The arguments for working with and for vulnerable people could be made clearer and a simple Theory of Change could help demonstrate how the “open door” approaches and the outreach activities fit with the ways in which anti-corruption work brings results.
Lessons
155. The selection of National Chapters and the mix of initiatives were appropriate at the start of the AC:DC programme and created a programme that could provide a wide range of learning from different circumstances. It raised issues for management but these were probably inevitable for a global programme on governance and anti-corruption.

156. The issue of poverty focus in anti-corruption work remains ambiguous. The investment in Outreach work and in recording vulnerability status has not yet provided helpful evidence to illuminate this issue and the potential value of targeting. Additional studies might be helpful to complement the observations being collected.

6. FINDINGS 4 – SUSTAINABILITY AND REPLICATION
157. Sustainability of project impact can be achieved in several different ways:
- The acquisition of knowledge about corruption and how to fight it that remains with people at community level (and facilitating CBOs) after the project has closed;
- Capacity (including funding) in NC to work on cases and use these to influence changes for both individuals and institutions.
- Better policies and institutional frameworks in place which support preventative and remedial anti-corruption work and increase transparency and accountability such as complaints mechanisms, freedom of information laws etc.

158. A high proportion of the survey results show NC staff consider it very likely that the results and benefits from their recent AC:DC work will continue (see Table 2):

<table>
<thead>
<tr>
<th>Answer Options</th>
<th>Response Percent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not at all likely</td>
<td>0%</td>
</tr>
<tr>
<td>Not likely</td>
<td>0%</td>
</tr>
<tr>
<td>Likely</td>
<td>13%</td>
</tr>
<tr>
<td>Very likely</td>
<td>87%</td>
</tr>
<tr>
<td>Too soon to know</td>
<td>0%</td>
</tr>
</tbody>
</table>

159. Many NCs are currently in receipt of new funds from AUSAID, EU and USAID. Some of these funds are channelled through the Secretariat (e.g. AUSAID) and others have been successful in national fund raising; Rwanda for example gets DFID funds via Norwegian People’s Aid and local EU funding.

160. In contrast Zimbabwe is successfully raising funds for anti-corruption work but not for the ALAC work specifically. In the Pacific region PNG annually raises funds and awareness through The Sir Anthony Siaguru Walk Against Corruption (SAWAC) in 5 districts. Following a call for proposals 7 NCs including Argentina are in receipt of innovation funds to pilot a local supporter based tele-marketing fundraising campaign. This pilot is mentored by staff at TIS and is on-going. For Argentina the target is to raise at least 5 months of their running costs. This project is on-going.
161. There is potential in some instances of conflicts between central TIS funds versus local and regional funding sources. TIS is aware of the risk that their role as an intermediary grantor for large funded programmes from international donors who want to reduce transaction costs, risks relationships within the Movement and also has potential to reduce NC options for local fundraising.

162. The online survey asked NC staff to rank 8 different reasons why their work was likely to continue to have impact. The results are summarised in Table 3.

Table 3 The importance of changes that lead to sustainable impact

<table>
<thead>
<tr>
<th>Change</th>
<th>Most important 1,2,3</th>
<th>Medium 4, 5</th>
<th>Least important 6,7,8</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. National Chapter has greater competencies</td>
<td>10</td>
<td>4</td>
<td>9</td>
</tr>
<tr>
<td>2. Partnerships are more effective</td>
<td>9</td>
<td>5</td>
<td>9</td>
</tr>
<tr>
<td>3. The ALAC and the NC are better integrated</td>
<td>9</td>
<td>3</td>
<td>6</td>
</tr>
<tr>
<td>4. Citizens more able to carry out anti-corruption action</td>
<td>9</td>
<td>6</td>
<td>5</td>
</tr>
<tr>
<td>5. Policies are better formulated and implemented</td>
<td>8</td>
<td>9</td>
<td>5</td>
</tr>
<tr>
<td>6. General public better informed on corruption issues</td>
<td>15</td>
<td>5</td>
<td>2</td>
</tr>
<tr>
<td>7. Evidence –based advocacy is done more effectively</td>
<td>8</td>
<td>8</td>
<td>6</td>
</tr>
<tr>
<td>8. Government is more flexible</td>
<td>4</td>
<td>8</td>
<td>6</td>
</tr>
</tbody>
</table>

163. The results indicate that the NCs believe that informed citizens (6) are critical to sustaining the changes which have been achieved. Taken with (4) "citizens more able to carry out anti-corruption actions" reinforces the idea that citizens are the source of sustainability. These are the strongest responses from the respondents. This also reflects the logic in the People Engagement Programme and a belief that understanding about corruption is the first step to engaging with change. The main focus of outreach work (meetings and the media) is on increasing knowledge and providing information about what actions can be taken. The use of this knowledge can only be tracked, under current monitoring methods, if people actually make complaints.

164. The relatively low importance given to government flexibility appears to suggest a lower assessment of supply-side improvements in promoting sustainable change. However other supply-side components like better policy formulation and implementation appear to be rated as reasonably important and the overall rankings appear to reflect a spread of views. This seems to support the idea that many NC staff members see sustainable change coming from both supply and demand side with “general public better informed” standing out as the single strongest reason for expecting sustainability of change.

165. The ET concludes that NC’s are committed to maintaining and in some cases expanding a professionally supported ALAC service and all will do so to some degree or other – increasing and reducing legal officers and type of outreach work depending on the funds they have available. Their capacity to retain legally qualified staff when funds are limited is the main concern and probably explains the apparent ambivalence in the

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Numbers represent the number of respondents who ranked the changes; for example, 15 of 24 respondents ranked the first change (general public are better informed) as being in the top three ranks of importance; only 2 respondents ranked this change as having low importance (ranks 6, 7, 8.)
Table 3 (above) on the importance of NC competence to sustaining impact. The AC:DC programme and in particular outreach work and ALACs are seen to have increased the visibility and credibility of the NCs which they hope to sustain over time.

166. The spread of ALACs across the TI National Chapters is significant since 2003 when three opened in Bosnia Herzegovina, Macedonia and Romania. ALACs are now operational in 60 countries with 90 ALAC offices. Furthermore the centrality of the ALAC approach to increasing people engagement in the TI global strategy and implementation plan suggests that the approach will be replicated for years to come. This cannot be attributed to the 5 year GTF programme alone. However during the life of this programme some chapters that did not want to work with ALACs at the beginning of the programme are now setting up their own. Chile, Nicaragua and Venezuela are all at different stage of opening ALACs with the belief that it will further boost their evidence based anti-corruption advocacy.

7. FINDINGS 6 – VALUE FOR MONEY
167. This section looks at VFM across the AC:DC programme and some views from the NCs on efficiency and effectiveness. Equity is considered above in the section on targeting.

7.1. Investments in programme quality
168. The AC:DC programme has allowed the Movement to invest in the development of its approaches and methods that are now being used across the Movement. The value of these investments, for example, the database will increase over time. However this evaluation is only able to assess the situation at the current time and project future increases that are potentially achievable through sustainability.

169. A key example of more rapid return on investments made using AC:DC funds is the “democratisation” of the NIS research approach. The programme piloted a more consultative and participative process for the National Integrity System survey which in Georgia initiated a change process. Validation of this new approach was done in AC:DC and impact is visible within the programme. This relatively expensive research was traditionally hard to fund but has since been scaled up – notably across all 27 EU countries. Following the success of Georgia, NIS will be implemented in 5 Central Asian states and repeated in Armenia and Belarus. The value of this additional work is potentially very high and it could not have been achieved without AC:DC funding. There is also a significant global impact on the image of TI deriving from the ambitious initiative to hold all 27 EC governments to account. It demonstrates that for TI, transparency and accountability is universally applicable and is not just about corruption in poorer countries.

170. During GTF ALACs were extended from 30 to 60 countries across the Movement. The ALACs have been valuable in terms of their impacts on corruption and as demonstrations of the demand-driven approach. As well as supporting the spread of successful approaches the AC:DC programme was willing to drop interventions which were not going to achieve the anticipated changes, as in the case of UNCAC checklists, which were stalled, and Ethiopia where governance conditions for implementing NIS recommendations were not conducive.
7.2. Investment in the database
171. AC:DC provided support for the development of the central database at a relatively low cost by supplementing the planning team with pro-bono expertise. The full benefits of the database have not yet been completely achieved. The MTR of TI’s PPA 2012 mentions that amongst other things:

*The information recorded by TI-S in the new ALACs database will demonstrate how the cost of this programme relates to money saved as a result of interventions and legal advice from the ALACs*.22

172. The ET observes that although demonstrating VFM is not the database’s primary function, it is still not yet able to provide this information or analyse it. The cost of setting up the database includes a significant amount of Chapter staff time, especially where Chapters decided to migrate data from the old 2007 system. Some staff members said that this had an impact on their other work. Particularly, for Chapters with a small team, the time required to get the database up and running prevented outreach activities for six months, as reported by PNG ALAC staff.

173. The benefits from the investment in the database are yet to be fully felt at National level. At this stage there is, in most Chapter increased and more professional case management. It is early days, but it is anticipated that as more data is included there will be more opportunities for analysis of trends and strategies in response to this which will reinforce the advocacy ambitions. The Movement is generally positive that the database is a long term investment for improving ALAC work, although from a VFM perspective it will always be difficult to make meaningful comparisons between types of ALAC work, due to the interdependence of the interventions. Overall it is acknowledged that the investment in the database will deliver benefits to existing and new ALACs over time.

7.3. Agile management
174. The management of AC:DC has also over the years been able to reallocate budgets where Chapters either left the programme or were less able to absorb funds. The regular quarterly financial reporting, which may appear onerous, allows rapid cycles of decision making and is a tool for effective fund management. In some instances these funds have supported innovation projects (Advocacy and Use of ITC) which are granted on a competitive basis to Chapters. Seed money for experimentation is helpful and encourages innovation – the questions of how these pilots are transformed into new ways of doing things is less well reported. More systemic analysis of what works and why would strengthen the effectiveness and VfM of these initiatives.

7.4. Overall assessments of impact
175. In general TI-S presents government or donor funds that are recovered through anti-corruption activities as part of its VFM effectiveness. This has more compelling simplicity than reliability. It does not show TI’s contribution. It does not answer the question: what happens next; where do these funds end up? Tracing where money saved actually ends up is to a large extent seen as beyond the limits of TI responsibility.

176. In terms of effectiveness ALAC staff are confident they are having an impact but are modest in their claims as they acknowledge they often contribute as part of a civil society initiative. It is also part of the TI approach to take on the role of facilitator rather

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22 Page 39 of IDL’s PPA report. Overall TI was given high ratings for economy and efficiency and a medium rating for effectiveness.
than lead agency and this makes it harder to appreciate the contribution of TI to changes that occur and to assess the value of the work. As has been illustrated above some changes in corruption are temporary and new ways may be found to reintroduce or reinvent rent-seeking when one method is ruled out. This raises the question of when the value of the anti-corruption work should be assessed.

177. In Zimbabwe the TI Chapter was clear that the impact of their work on the electricity billing system was the provision of evidence from the case load, while acknowledging the critical on-going role of the Combined Harare Resident Association in following up the campaign - by negotiating with ZESA. The desire at Chapter level to not claim all the credit is seen as an important part of their encouraging other actors to take on anti-corruption work. This level of sensitivity does not fit well with proving VFM.

7.5. Awareness of cost drivers
178. TI is cost conscious in both the Secretariat and the National Chapters. There is a culture of cost-saving and procurement and finance systems promote this internally. National Chapters are familiar with working on a voluntary basis and even funded programmes include interns and volunteers. In most cases the NC are conscious of the limitations of funding and look for ways to avoid increasing overheads.

179. ALAC staff appear to be acutely aware of the cost drivers in their work e.g. outreach communication materials in different languages; reducing outreach in favour of television advertising for ALAC services as this was the “best method of communication”. This is more efficient where ALACs are fully integrated into the Chapter which allows for mutually beneficial sharing of resources. Examples of cost reductions occur in:
  - Executive Directors sharing legal advice work to meet demand
  - Legal intern and volunteers – a flexible resource
  - Shared facilities etc.
  - Joint events by ALAC and other NC work at community level
  - Pro-bono support from local or regional lawyers

7.6. Overheads
180. The MTR team raised the question of overheads in relation to the higher than stipulated percentage of overall funds being retained in the Secretariat. The response from TI-S was that the funds were used for programme delivery activities especially capacity building, which was considered to be better organised from the centre. The paragraphs 196 et seq. on Capacity Development question to some extent the overall quality of the capacity support. Although the ET accepts the usefulness of the central function in some aspects of capacity building, it feels that overall delivery could be more effective. As stated above it would be helpful for more monitoring of change following capacity development support as this would provide evidence on which to choose the “best method” for delivery.

7.7. Sustainability
181. Sustainability can change the value of programme activities and completely change the VIM calculations. See Chapter 6 for further work on sustainability.
7.8. Lessons
182. Management is the most important aspect of innovation. It requires good systems to select ideas to be tested and sharp monitoring to determine which trials should be abandoned and which should be developed as mainstream activities.

183. A way of assessing impact will have to be developed if funding is to be sought from donors like DFID. **Contribution analysis** may be helpful. It need not be a fudge of existing methods – it would be good if it could be something dramatically different.

8. INNOVATION
184. The respondents to the online survey were unanimous in identifying innovative practice in their project work. The survey offered respondents the opportunity to report on innovation for their organisation; for their geographic area; for governance work more generally or in unexpected or surprising ways. The results are shown in Table 4.

<table>
<thead>
<tr>
<th>Table 4 Innovation in AC:DC work</th>
</tr>
</thead>
<tbody>
<tr>
<td>Thinking about innovation, has your work in the last 2 years involved new ways of working ...</td>
</tr>
<tr>
<td>Yes</td>
</tr>
<tr>
<td>---</td>
</tr>
<tr>
<td>...for your organisation?</td>
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<tr>
<td>...in your geographic area?</td>
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<tr>
<td>for anti-corruption work?</td>
</tr>
<tr>
<td>in the use of technology?</td>
</tr>
<tr>
<td>...in unexpected or surprising ways?...</td>
</tr>
</tbody>
</table>

185. The Speak Up! Global AC:DC ALAC event in Berlin, March 2013 opened with the remarkable news that corruption, which traditionally thrives in the shadows, had become the world’s most discussed topic - ahead of poverty, unemployment and climate change, according to a BBC survey in late 2010. Coming half way through AC:DC, the survey of 26 countries detected a global demand for accountability on the back of increasing public disgust with corruption.

186. The TI Movement was at once protagonist and participant in this massive change in public awareness and attitudes. It is only overstating the case a little to claim that Chapters of studious and respectable lawyers were, like it or not, in the process of being transformed into high profile actors of social Movements by the oxygen of exposure and publicity. By the end of AC:DC there are few TI Chapters that are unaffected by a change that the Movement as a whole welcomes – a democratizing focus on the ordinary citizen in all his or her diversity, age or status.

187. AC:DC’s innovations should be viewed within this broad context of decreasing levels of tolerance for corruption. As the evaluation survey also suggests, there has been a flowering of individual initiatives, each with a distinct local character. They can be categorized under the broad titles of reaching out, exposure, technology, coalitions and pushing boundaries. Some of these initiatives, marked with an (I) below were funded under competitive, technology-focused “innovation grants” – themselves a

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23 BBC World Service. Website accessed 23.07.2013:  
management novelty open to all 23 AC-DC Chapters in 2012 and building on a similar AC:DC initiative for advocacy and campaigning.

188. Reaching Out. The ALAC took the first step of inviting the public into the Chapter to hear complaints and advise on their solution. Next ALACS multiplied, as in Rwanda’s virtual franchise approach across the country. Other ALACs simply took to the road in an effort to bring their services to rural areas, going to the people rather than waiting for them to come. Rwanda did both. Pakistan created a constituency of local NGOs and, fully in the new spirit of decentralization and democratization, trained the staff as the equivalent of branch ALACs. Kenya’s Chapter did much the same, linking up with community based organizations that lobby for affordable electricity and mother and child maternity services.

189. Chapters also made efforts to reach society’s unreached: volunteers from Argentina’s ALAC, for example also left the office, crossing the country to the border with Uruguay to support indigenous peoples rights to documentation – a defence against people trafficking. Closer to home the Chapter, Poder Ciudadano (Citizen Power) also started long term support relationships with the residents of under-served barriadas (shanty towns) of the capital Buenos Aires. TI Pakistan reached out to children in schools (as did the Solomon Islands), youth through street theatre and women through training. To ensure that its services reached deep into popular livelihoods, the Pakistani ALAC set up kiosks to dispense anti-corruption advice in the bazaar.

Exposure has proved essential for the broad dissemination of AC:DC’s demand approach. Palestine(I) known for its innovative technology-driven campaigning, designed and broadcast 20 interactive radio shows on corruption and dealing with it by addressing citizens’ complaints head-on. In Pakistan, costly television advertising had a magnetic effect on the public, ensuring that the Chapter consistently topped AC:DC’s number of complaints – rapidly establishing its credibility amongst the country of some 180 million – half of whom are below the poverty line. Rather than pay for exposure, PNG was savvy enough to combine it with fundraising in its annual island-wide walk, in which it generates much of its budget. Other imaginative mass events were organised in Vanuatu to mark anti-corruption day and the Bosnian Chapter held a street party in Banja Luka to celebrate Freedom of Information day – both in 2012.

190. Technology. Inspired by the success of web sites like India’s ipaidabribe.com, and conscious of gaps in its own practice, TI-S set much store in adapting new digital technology to its own programme needs. AC:DC, for example, took part in and contributed financially to a Movement-wide drive by the People Engagement Programme to embrace new digital and mobile technology. Innovations both fed into and were inspired by TI’s global Hackathoninitiative in October 2012 aimed at harnessing the

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24 TI defines a hackathon as an event where thematic experts work side-by-side with software developers for 24 hours to come up with solutions to a diverse array of problems that have been identified. An innovative endeavour on their own account, they allowed the development of ICT solutions that were then piloted via the innovation grants. Hackathons are also collaborative; Colombia’s attracted hacks from Telefonica, Movistar, Wayra Colombia, Microsoft, Publik and the specialist partner Random Hacks of Kindness.
power of ICT to tackle corruption. Arising from a partnership between a specialist NGO (the Engine Room) and PEP, the initiative brought activists and hackers together to resolve pre-determined challenges. Colombia was one of two AC:DC Chapters to receive a grant on the basis of its problem statement – electoral reform. Within 24 hours hackers attracted from the country’s premier tech companies had developed a web and mobile citizen tool called Participa.co to report on electoral advertising for the 2014 national elections.

191. It is clear to the evaluation team that initiatives like those emerging from the Hackathons have encouraged and motivated AC:DC Chapters to engage with technology, albeit at different levels. Zimbabwe(I) and Kenya(I) set up inter-agency complaints, referral and communication platforms to enhance accessibility and Nicaragua’s platform covered the entire Central America region. Bosnia linked in with Romania and Macedonia via the Ushahidi platform. In mid-2013 Rwanda(I) organised their own Hackathon for French-speaking Chapters and also introduced its “ifate” web-based complaint reporting and management system. Chile(I) and Colombia also used technology to keep down the costs of dissemination of their research findings through digital reports and, in the case of Chile, a web platform giving data on health and education services for approximately half of the country’s municipalities. Colombia also made an astute alliance with the Ministry of Education’s network of local radio stations to create professional-standard dissemination materials on the importance of citizen participation against electoral fraud and other forms of corruption. Similarly, Ghana(I) used participatory video for a campaign to empower women to fight corruption and discriminatory practices.

192. Coalitions were extensively used to enhance the impact of Chapters, one of the most imaginative being that of Transparencia Colombia. TC carried out an action research programme though new local civil society “observatories” of the integrity of municipal councils, ensuring that development planning benefited from the technical expertise of local universities and of grass roots organizations as well as the influence of powerful contractors. TC served as the secretariat of this new coalition, which rapidly expanded to encompass the largest municipalities of the country of 47 million people.

193. Restructuring. Many of the Chapters participating in AC:DC, particularly those that started up ALACs during the programme, have made substantial adjustments to their management in response to the increase in public demand for services. Poder Ciudadano in Argentina has undertaken the most thoroughgoing change, rebuilding the structure of the Chapter around the ALAC - the entry point for the public and the hub of its wide spread of services. To secure financial resources sustainably it is piloting a model of telephone fund-raising(I) for regular monthly subscriptions from supporters. Poder Ciudadano is linked in a community of resource mobilisation practice with 7 other Chapters, all of which benefit from mentoring services provided by TIS.

194. Pushing boundaries. TI’s traditional approach of constructive criticism has undergone some modification and developed a sharper edge during AC:DC. This is most evident in the highly original and hard hitting campaigning style of MANS, the Montenegrin TI partner. Specialized in challenging politicians over widespread corruption
attending this transitional country’s mass privatization of public assets, MANS faces regular libel actions yet is less nervous than TIS of the outcomes.

195. Other Chapters, such as Bosnia and Herzegovina take a strong line on corruption as does one of the most effective in this project: Georgia has managed to cooperate with two governments within the TI National Integrity System framework, while at the same time mounting forceful television campaigns and taking the capital’s municipality to task for irregular procurement practices. This harder edge to the Movement is proving attractive to the public and eliciting important concessions from government. In the Georgia case for example, pressure for open government in a very centralised system has led to the President agreeing to post all presidential decrees on line.

9. PROGRAMME MANAGEMENT

9.1. Management within TIS

Overall management in TI
196. The management issues have changed during the life of the AC:DC in terms of the scale of the programme, the requirements of the donor and the necessary competencies of staff in National Chapters. At its launch AC:DC was one of the largest programmes ever undertaken by the TI Secretariat in Berlin. By the time it was nearing completion in 2013, the context of TI operations was very different and AC:DC was just one of several large scale multi-country programmes. TI has been helped in developing its capacity to manage such programmes partly through the use of its PPA with DFID which since 2006 has enabled the Secretariat to develop strategies and systems in line with the growing scale of activities.

197. Management of funds centrally by the secretariat does not fit easily with the decentralised structure and local autonomy of NCs and this applies to other programmes not just the AC:DC programme. TI is not designed like many INGOs which have a more centralised structure and a management hierarchy which is more able to roll out systems and require compliance from country level staff\(^{25}\). The National Chapters are built from local organisations which are usually independently active before becoming affiliated to TI and this is fundamentally different from an international agency creating a country office. TI secretariat may not have made the differences between its configuration and that of a more conventional INGO sufficiently clear to the MTR team and perhaps other stakeholders.

198. The NCs maintain a level of independence in their national environment which reduces the risk of them being seen as external interference. NCs, for example, are very careful about where they obtain funds also in order to preserve their position as independent local organisations. Management at the programme level requires therefore the capacity to engage and persuade and to tolerate local differences. At the same time National Chapters also require and value guidance from the centre and it is important to find a balanced approach. The size of the programme and the growth in the overall size of the Movement may mean that more resources or a more streamlined approach would have been useful during the AC:DC.

Funding of central functions in AC:DC programme

\(^{25}\) Staff in such organisations would certainly say that their management approaches contain a great deal of participation of country office staff but our main point here remains true.
199. The MTR raised the issue of the high share of the budget (aggregated at 28%) spent in Berlin. The management response indicated that of this the funds were divided between management and monitoring and evaluation (14%) and 13.7% allocated to technical support and capacity development. One of the arguments in relation to cost efficiency was that a group of T-I regional coordinators were able to provide technical support to more than one country and were already very familiar with the NCs capacity strengths and weaknesses. In response to the MTR TI invested more funds in capacity strengthening managed largely by the Chapters themselves.

**Capacity strengthening**

200. Improving capacity of the NC was mainly managed from the centre and in the second half of the programme capacity development focused on improving advocacy capacity and the various methods used as discussed under Output 2 above. Post mid-term TI did not adopt the holistic approach suggested by the MTR team but instead supported Chapters with grants for advocacy and later IT innovations.

201. There was limited systematic assessment of uptake of newly acquired skills and knowledge, from: training; intra-regional exchanges, support to short term innovation grants and learning events etc. The fact that advocacy initiatives were undertaken is clearly a proxy that skills were being applied. The Speak Up event at the end of the programme brought together ALACs from across the world to share experiences of increasing transparency and accountability through increasing the citizen engagement as well as promoting the new banner of the TI Movement of “no impunity” for corrupt actors.

202. The ET considers that overall a clearer approach to strengthening Chapter capacity based on diagnosis of needs, which could have drawn down on INSP expertise and capacity development good practice would have been helpful. The prevailing idea that peer-to-peer learning is more effective cannot be assumed; monitoring uptake and changes from all capacity interventions provides the Movement a better idea of what works well in what circumstances.

203. Overall although the support from the regional coordinators is valued by the NCs, good practice in capacity development would require consideration of their capacity to support NC to meet their different needs. For example mentoring, coaching or teaching are all associated with the roll out of a new system.

**M&E functions**

204. During the life of GTF the approach changed and the requirement for evidence of impact became increasingly important and forceful. All organisations funded under the GTF had to increase their investment in M&E and in reporting. This was part of an increased focus on results throughout the international development sector but was particularly strongly felt in the GTF partly because initially the focus was more intensely on learning about what was effective in promoting better governance and less on demonstrating impact on governance and on poverty.

205. TI started with the disadvantage of not having a shared M&E system and of having staff far less familiar with M&E methods than many other grant holders under the GTF.

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26 Mentoring, coaching, training etc. might all be required at a different stage of rolling out the new system or reporting format.
TI was faced with the need to develop an M&E system and diffuse it through the participating NCs. This included work on developing a central database which all the NCs could input data to and extract analyses. The design of the database required considerable input from the NCs and although the process is described as democratic it may be that the level of consultation and sharing of ideas that was required for an organisation as dispersed as TI was not fully achieved. The level of support required by NC does not appear to have been met and the capacity of the regional coordinators to support the NCs is varied.

206. Nevertheless most of the NCs have managed to migrate their data into from their old databases to the new database and continue to update their entries. The new database is divided into locally accessible data on clients and cases and global, non-confidential information is aggregated on the global database. The synchronisation of data centrally allows the Secretariat to look at global issues and trends. The achievement of getting the database to function in approximately 70% of the ALACs is impressive, although at the end of GTF most NCs are not yet fully able to interpret their own data.

207. The analyses provided in the annual reports based on the database are really print-outs of aggregated data which are not analysed in the sense of being explored and explained. For example, there is no explanation or exploration of the stories behind the numbers of women and men making contact and taking part in case work in the different countries. This is despite the huge importance of gender issues in the initial contact and eventual case work done and very significant differences between the gender balance in different countries. Instead most data are presented as averages which tend to hide the more interesting stories that could be told and the more interesting learning that could be shared.

208. The example of conversion rates between contacts and cases might be an example of this (see Table 5). The data provided in the NC annual reports include the numbers of contacts and cases but the conversion rates are not provided. In fact, conversion rates vary between 5 and 95% according to country and within each country the conversion rates can vary enormously from year to year which may reflect different NC strategies. Conversion rates are not a simple metric and probably cannot be used as an indicator. However it would be fascinating for the outside observer and useful for managers to understand the processes that lead to the different conversion rates.

Table 5 Conversion Rates from Complaints to Cases by Country-

<table>
<thead>
<tr>
<th>Country</th>
<th>Y2 Contacts</th>
<th>Y2 Cases</th>
<th>Y2 %</th>
<th>Y3 Contacts</th>
<th>Y3 Cases</th>
<th>Y3 %</th>
<th>Y4 Contacts</th>
<th>Y4 Cases</th>
<th>Y4 %</th>
<th>Y5 Contacts</th>
<th>Y5 Cases</th>
<th>Y5 %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Argentina</td>
<td>50</td>
<td>36</td>
<td>72</td>
<td>149</td>
<td>29</td>
<td>19</td>
<td>151</td>
<td>25</td>
<td>17</td>
<td>121</td>
<td>7</td>
<td>6</td>
</tr>
<tr>
<td>Bosnia &amp; H</td>
<td>175</td>
<td>156</td>
<td>89</td>
<td>174</td>
<td>144</td>
<td>83</td>
<td>226</td>
<td>204</td>
<td>90</td>
<td>192</td>
<td>71</td>
<td>37</td>
</tr>
<tr>
<td>Fiji</td>
<td>275</td>
<td>84</td>
<td>31</td>
<td>165</td>
<td>61</td>
<td>37</td>
<td>136</td>
<td>15</td>
<td>11</td>
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<td>Ghana</td>
<td>110</td>
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<td>430</td>
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<td>3</td>
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<td>Kenya</td>
<td>401</td>
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<td>Liberia</td>
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<td>12</td>
</tr>
<tr>
<td>Nepal</td>
<td>972</td>
<td>184</td>
<td>19</td>
<td>1,113</td>
<td>293</td>
<td>26</td>
<td>570</td>
<td>139</td>
<td>24</td>
<td>307</td>
<td>36</td>
<td>12</td>
</tr>
</tbody>
</table>
The ETs reflections are that in the current formulation and usage the monitoring scales used in the database require some refining to become meaningful and useful. Initially greeted with some acclaim in the PPA working group\textsuperscript{27} the scales offered a solution to the problem of allowing local expression of change and aggregating the very different observations of change that emerge from a global programme. In particular the systemic change scale represented a breakthrough for the organisation as it was the first attempt to define types of systemic change and offered the opportunity to aggregate. Scales can do this where definitions of change are locally meaningful and where simple observations of the direction of travel (greater or smaller; better or worse) can be useful.

The scales created in the database were probably created with wide consultation but were challenged when put into operation. It may be that a short pilot period or experimental testing would have been useful before the scales were widely disseminated.

In the case of the Partnerships scale the use as an indicator has been rendered almost useless by the addition of the phrase “as appropriate”\textsuperscript{28} which means that the project is being assessed on how appropriate its relationships are which is something that probably only the staff can do effectively. The point is that the testing revealed that the scale did not represent a direction of travel and that some partnerships should remain in the same place in the scale throughout the life of the relationship. The result of this situation is that partnerships are being scored by national staff on a system which is not a scale and which does not provide insight into the quality or purpose of the relationships.

At the same time the staff is very aware of the importance of good relationships and of acting in partnership with others and can provide detailed and subtle arguments for the type of engagement that they have with other agencies. These might include, for example, access to and sharing of news and information or providing solidarity and unity in order to protect each other from hostile reactions from government. The reasons are varied and often time and location specific and do not necessarily fit with the stages in the partnership scale.

The advocacy scale describes a conventional sequence of steps in an advocacy campaign and it is hard to imagine a better scheme if it were necessary to describe progress in a standard campaigning organisation. However, staff describe processes

\textsuperscript{27} Interview with Olivia McDonald, GTF programme coordinator, Christian Aid.

\textsuperscript{28} Indicators 3.2 and 3.4. See Box 3 in paragraph 63.
that do not follow such straight-line changes but may ebb and flow as campaigners develop their methods and the targets of the campaign become more or less sensitive to challenges.

214. The systemic change scale attracts the most interest outside of the TI Movement and should be the most useful. Of course it is not necessary for change to proceed step-wise through the scale and a sudden leap may occur when a new policy if proposed or adopted. It is also true that not all initiatives start at the beginning of the scale as in any National Chapter there is work ongoing which might have already reached a level towards higher impact. This has impacts on the use of indicators 2.1 and 2.2 in the logframe where the number and speed of advocacy campaigns are used as measures of progress.

215. The difficulties with the scales can probably be addressed by allowing more local definitions to be introduced and by accepting more flexible use. This may mean for example that progress in different country programmes cannot be directly compared except in terms of making progress. For example; Country X may say that it has moved from 2 to 3 while Country Y says it has moved from 3 to 4. This would allow an aggregation (two positive changes of one step) which would be backed up by local interpretations of the meaning of the changes.

216. Solving the difficulties of the scales needs to include genuine analyses of the data in the database around, for example, the conversion rates of cases or gender issues.

Lessons

217. TI has, in common with many recipients of DFID funding, invested heavily in M&E and in the creation and management of a single global database. Investment included commitment of staff time in most national chapters. The full benefits of this are yet to be realised for NCs and the Secretariat.

218. In NCs the analyses being produced from the data are not exploring the potential meaning and exploiting their usefulness. The current presentation of data seems to suggest a lack of capacity to interpret what the numbers mean for impact and for future management. More investment in NC capacity in this will be important for improving data utility.

219. The scales tend to obscure the nuanced understanding of national chapter staff in the areas being explored: advocacy, partnerships and levels of impact. The scales provide further evidence of the difficulties of designing locally sensitive and globally meaningful and cumulative observations.

9.2. Management by donor and grant manager

220. During the course of GTF the grant manager did not seem to follow up on weaknesses in logframe. The manager did not take the opportunity presented by the Revised Logframe Format to address some of these. The evaluation team is aware that it would have been a massive management task to move all GTF grant holders to the Revised Format but some of the larger grant holders could have been supported to

29 The programme team understand that until all the data has been inputted it is not reasonable to interpret globally.
move to the Revised Format where questions were being raised about the use of the older format.

221. The AC:DC might have been a candidate for such treatment as it became clear that Output indicators were being attained early and questions should have been raised as these attainments did not seem to be leading to achievements at Purpose level.

222. The interesting discussion about targeting poor people in anti-corruption work was not pursued after an initial exchange after the MTR report recommended greater engagement with vulnerable and disadvantaged people. It might have been helpful to have requested a clear Theory of Change from TI that would show clearly how anti-corruption work benefits poorer people even when there is little or no direct contact with them. The assertion that poorer people suffer more from corruption might have been usefully challenged so that research findings or similar evidence could be shared and the discussion taken to a point where it made a helpful contribution to understanding in the international development sector.

223. The increasing pressure to demonstrate impact which reached intense levels with reporting requests in the final year imposed significant burdens on TI staff and worked against reporting of interesting learning and strongly discouraged reporting of learning about failure. It might have been helpful to introduce reporting demands more gradually and to find ways of collecting interesting observations, perhaps separately from the evidence of impact, to support learning in the sector and the early aim of the GTF to find out more of what works and does not work in governance programmes.

9.3. The logframe
224. The logframe did not provide useful support and guidance to management. The logframe has a number of internal weaknesses including, for example, where the attainment of indicators would not necessarily lead to achievement of the Output and where indicators do not link strongly to the activities and influence of TI and these issues have been mentioned in the appropriate sections above.

225. As noted above (para 220) the logframe was not updated when it became obvious that targets were being met and exceeded neither by TI-S nor at the request of KPMG.

226. It is obviously extremely difficult to make a single logframe work as a management tool for a wide diversity of initiatives across a global programme involving 23 countries. If the AC:DC had included only ALAC projects it might have been easier but the range of research and advocacy initiatives in addition to the diversity of work coming out of the ALACs created a set of very different observations to monitor.

10. CONCLUSIONS AND RECOMMENDATIONS.

10.1. For Transparency International

The ALACs
227. The ALAC model is powerful and can be a useful addition to many anti-corruption programmes. It requires proper resourcing and integration with other activities.
228. The integration of activities within a National Chapter should mean that work in the ALAC and the research and study work are mutually reinforcing. The engagement with citizens, research work and interpretation of data should support each other and lead to better influencing work and overall better results.

229. The ALACs have increased the amount and importance of demand side work on anti-corruption but part of the strength of Transparency International’s approach comes from being able to work well with a mixture of supply and demand side initiatives.

**Theories of Change**

230. A Theory of Change for ALAC work is put forward in the excellent Start-Up Manual and this should be modified where appropriate and ratified by the Movement and disseminated as helpful guidance to others working in the sector.

231. The logframe has not served the AC:DC well and the focus on reporting on attainment of indicators has distracted attention and resources from the collection and dissemination of important learning from the programme. The situation can be better managed by the addition of use of detailed Theory of Change and by the use of narrative reporting.

232. Develop a Theory of Change and identify changes that are important to impact and find ways to assess these changes. In particular, examine the impact of contact with ALAC staff on complainants and clients ideas and attitudes. Develop cheap and simple methods for collecting information using new technologies where appropriate.

233. Work on assessing limits of responsibility should be worked up into more comprehensive and more flexible assessments of Risks and Assumptions in the use of logframes. This would make the logframes more useful and realistic as management tools and allow more meaningful narrative reports on higher level (Outcome and Impact) achievements.

**Monitoring & Evaluation**

234. The AC:DC programme has allowed the Movement to move forward with a shared framework for monitoring their work. This is a significant shift and there is increasing awareness in the NCs about the value of monitoring. The Movement understands this is work in progress and the recommendations here are provided as signposts to increasing understanding of impact and learning within TI programmes.

235. Ideas from **Outcome Mapping** should be tested as ways of identifying constituencies with which TI staff have direct contact and categorising types of behaviour change that could easily be monitored. Outcome Mapping might also be useful for staff in terms of assessing the limits of responsibility that they are prepared to accept for the achievement of impact level results.

236. The work of TI depends on changing attitudes and behaviour and it should be possible to monitor changes among those who are in direct contact with ALAC or National Chapter staff. As the PEP puts greater emphasis on empowerment it will be important for the Movement to clarify definitions and if necessary consider developing a progressive scale for measuring empowerment. The MTR says that ALACs are empowering of citizens and at community level and these changes should be monitored to provide the evidence alongside the more routine collection of numbers of
complainants and other proxy indicators. Some methods of sampling may be required which may depend on complainants agreeing to be contacted.

237. Develop impact studies to supplement reporting on attainment of indicators. Process Tracing should be tested to see if it could be helpful in assessing impact of advocacy work and the contributions of TI work.

238. The Scales (especially the Partnership Scale) are only weakly reflecting the knowledge and understanding of staff and the results are not supporting decision-making in management. Once the pressure to report on Indicators of Output 3 has lifted, consider developing local Scales with a small number of volunteer National Chapters. The Scales could have local definitions and would be aggregated in simple terms of the direction of travel towards (or away from) locally identified improvement.

239. For Partnerships this needs to incorporate a clearer sense of the overall “purpose” of the relationship, noting the start and end points so that change and progress can be assessed.

240. Overall TI’s M&E would benefit from experimenting with new methods and tools with small number of Chapters rather than going to scale immediately.

The database

241. Develop skills in NCs on analysing their data which they can download and make more effective use of the central database. This is not so much a question of thinking about the data but also thinking through what it tells them about how they are working.

242. Demonstrate the learning that can be extracted from data analyses: for example changes in the constituency of contacts resulting from outreach activities; understanding of the differences, if any, between complaints made by men and by women. For example the ALAC staff is aware that women report corruption less. In most instances this is ascribed to cultural conservatism. In some Chapters this leads to the development of alternative approaches whereas in others the same thinking does not lead to alternative actions. Showcasing examples where interrogating data can lead to helpful management decisions would be a useful addition to reporting.

243. While not the only TI learning tool, the database has yet to fulfil its potential as a “gold mine” of learning on what works in promoting transparency and reducing corruption. There are observations being made and data being collected which can provide this learning which will be of enormous value to the sector both in terms of small scale activities in engaging with citizens and larger scale management of advocacy work. More effective demands should be made of the database so that systems are created to ensure that the ability to provide learning from experience is improved. There may be other issues in the rewards and incentives of database management that lead to the apparent weakness in curiosity and, if so, these should be addressed.

Gender

244. TI responded to the MTR comments by improving disaggregation of data. This in turn encouraged Chapters to reflect on how they encourage women to engage in anti-corruption activities. There is still a risk of gender blindness and the NC reports often use cultural conservatism as a reason for the absence of women. While this may be the case there is room to improve understanding and response to gender related corruption.
issues. The initial step is to begin recording more clearly the gender dimensions of corruption issues in the database. This is more informative than the gender of the complainant.

**TI ways of working**
245. As a Movement the TI Secretariat has very different lines of accountability which is not the same as INGOs. TI invests in making this known to donors and key stakeholders however the INGO model is very dominant and TI needs to be tireless in efforts to increase understanding of the nature of the Movement.

**Capacity strengthening**
246. The TI Secretariat needs to be clearer about when it has a legitimate lead in capacity strengthening for NCs and when NCs should take the lead. NCs appear to value the support they get from the Secretariat and in some cases would like more support.

247. In future programmes it is recommended that TI should build in a stronger link between the in-house TI INSP and programme capacity development. Good practice suggests that capacity strengthening is better undertaken on the basis of sound, holistic analysis of needs and planned response using appropriate methods. This also provides the foundation for monitoring change in NCs and identifying on-going needs. This does not exclude peer to peer but it would be used more strategically and where it is seen to add value.

**Learning**
248. For learning events on a larger scale and peer to peer work, immediate evaluations should be combined with commitments to “doing things differently” as an individual and where realistic as a Chapter, which can then be followed up through local management and if relevant reported on globally.

249. The potential to learn more from client satisfaction surveys should be explored. The inclusion of questions relating to what you were able to do with the advice provided and what happened next would increase the usefulness of such surveys to understanding what helps people act. Although beyond the remit of this evaluation it is clear that as TI Chapters take on more funded projects and programmes the assessment of Board capacity for supervision and oversight will be required.

**VfM**
250. It is necessary to be able to describe and defend decisions to reduce costs and raise quality as part of Value for Money assessments of TI work and management decisions. Staff need support in expressing their knowledge of cost drivers and efficiency measures to facilitate future VfM analyses.

**Sustainability**
251. The AC:DC programme has ensured that ALACs are now an established TI approach in the fight against corruption. Currently funding is available but for future proofing it will be important to “sell” the service as a core activity of the Movement rather than dependent on project funding. A better understanding of the costs and benefits of the ALAC service is not yet arising systematically from current monitoring. The impact studies would help with this. The lessons emerging from participants in the fundraising
mentoring may be a useful starting point for discussions around what are essential Chapter services.

### 10.2. For DFID

#### Theory of Change

252. Promote and make use of a variety of styles of development and presentation of Theories of Change. Do not insist on standardised approach or model. Insist on clear links between Theories of Change and logframe; for example, that some changes in the ToC appear as outputs or indicators.

#### Working in anti-corruption and governance

253. Do not accept simplistic accounts of governance work in logframes and Theories of Change. Require grant holders to provide more detailed and interpreted accounts of Risks and Assumptions that are presented in logframes. Allow grant holders to present ideas of limits of responsibility where the Risks and Assumptions are important and hard to predict and where excellent work may not lead to higher level impact.

#### Promote learning

254. Allow grant holders to focus on learning by including learning outputs or learning indicators at Outcome level. The focus on impact on governance at Outcome level can work against effective learning and powerfully against learning from “failures”. Failure may be in terms of projected changes not coming about or delays or setbacks after initial success and many other forms. Staff of grant holder agencies may not report on these events when under pressure to demonstrate success and learning will be lost.

### 10.3. For KPMG

#### Theory of Change

255. Encourage the presentation and exchange of ideas on projects using Theory of Change which can then be related to logframes. The ToC makes it easier to express complex ideas than the more rigid logframe and may be more suitable for programmes like improving governance. Ensure that the logframe and the Theory of Change conform and support each other.

#### Use of logframes

256. Pursue best practice in the use of logframes. The quality of monitoring might have suffered because the grant holder was not adapting their logframe to fit with the rapid progress in attainment of Output indicators. A Global logframe may not work for the management of very varied project work in a wide variety contexts and should be replaced or combined with other tools where difficulties become evident.

#### Managing the needs for evidence

257. The late requests for evidence of impact imposed significant demands on TI-Secretariat and National Chapter staff and may have negatively affected the sharing of learning. A more gradual introduction of reporting on stories of change would have been helpful.

#### Promote learning

258. The focus on reporting against logframe indicators and the drive for evidence of impact on anti-corruption may have diverted staff attention and resources from learning and sharing ideas of what works and, more particularly, what does not work. It should be possible to allow grant holders to include learning as an element of the programme
logframe so that it is not seen as separate from routine reporting. Allow grant holders to invest more in staff time for learning; for example, in attending learning groups or national or regional meetings or developing short pieces for internet or more direct communication and other appropriate means that could create the confidence necessary to share admissions of weakness.