GHK Mid-Term Review of the Programme
Anti-Corruption: Delivering Change

TI Management Response on Final Mid-Term Review Report
May 2011

1. Introduction

The following document is Transparency International's management response to the final report from the commissioned Mid-Term Review (MTR) conducted by GHK on the DFID funded programme Anti-Corruption: Delivering Change (AC:DC) from December 2010 to April 2011.

TI-S would like to express its gratitude to GHK for this Mid-Term Review and for the spirit in which it was undertaken. We also much appreciated the opportunity, both from TI-S perspective and that of the six available National Chapters (NCs)[1], to discuss the report in Berlin on 31st of March 2011 in the MTR Workshop with the GHK evaluation team.

TI-S [2] recognizes and commends GHK for having delved into a large amount of background information as well as making use of frequent communication with TI in addition to their field visits to four countries[3], the MTR Workshop and exchange on the Draft Evaluation Report. This approach has ultimately led to a rich report that articulates a number of constructive recommendations, many of which are in line with the directions outlined in the new TI Strategy 2015. In the next section of this document we present the key follow-up actions that stem from the recommendations put forth by the MTR report. A comprehensive analysis complementing the findings as well as providing insight on TI's perspective is provided in Annex 1.

2. Follow-Up Actions

TI commits to several **follow-up actions** in response to the MTR, which include the following:
Advocacy, capacity development and impact
- Continue supporting **coalition building** and making strategic use of the Nantional Integrity Systemns (NIS) Advisory Group to facilitate results-based advocacy.
- TI-S will identify a systematic approach tailored to the AC:DC programme based on the new Organizational Capacity Assessment Tool (OCAT) to **gauge NC capacity needs**.
- TI-S will support chapters in developing and documenting locally tailored approaches to reaching out to **communities** and marginalized groups while at the same time **delivering impact at scale**.
- TI-S commits to ensure to follow up with NCs on their **advocacy plans and related activities** and assisting chapters to develop this by using tools that help them navigate the **political dynamics** in their countries. This aspect will also feature in the AC:DC Work Plan for year four as the focus of the programme shifts increasingly to an advocacy perspective.

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[1] Representatives from the National Chapters of Armenia, Chile, Colombia, Ethiopia, Georgia, Nicaragua
[2] Transparency International Secretariat
[3] Bosnia, Georgia, Nicaragua and Zimbabwe

- The translation of **policy change into practice** is a priority within the context of the TI Strategy 2015. We commit to supporting concerted efforts and innovative approaches at the national level through the work of NCs to utilize locally adapted methods researching and advocating at the institutional level and through collaboration with different actors (civil society, media, and the general public) to further this aim.
- Liaise regularly with the **gender** task force at TI-S in working towards operationalising the gender strategy.
- Collaborate with NCs implementing initiatives other than the NIS and ALAC to increase **synergies** and **compatibility** with the main AC:DC programme components.
- Support Advocacy and Legal Advise Centres (ALACs) to ensure that all, including the **most vulnerable,** have equal information about and access to the ALAC services.

Management, fundraising and M&E
- TI-S will further **consolidate monitoring and reporting tools** and seek simplification where possible and appropriate in close coordination with NCs. This will be done with due caution taking into account that changes in the tools will translate into the need of providing more support to the chapters to ensure that a) the latest version of a given tool is being used and that b) the changes and requirements for reporting are correctly understood by them. Changes to the tools and approaches will largely be conducted in house.
- A **data presentation** annex will be included into the AC:DC Annual Report.
- Greater **coordination and integration** between the relevant departments will be put in place to improve communication and coordination between the relevant departments involved in the implementation of the AC:DC programme at TI-S.
- Identify and address challenges in the implementation of the Most Significant Change (**MSC) pilot** as pertains to the AC:DC programme and define the best way forward (e.g. potentially piloting in two countries as suggested by GHK).
- The **logical framework** will be adjusted in coordination with NCs to ensure that they can commit to delivering any additional or modified result areas.
- Providing support to chapters in their **fundraising** activities remains a key area of focus; TI-S and NC will also focus on diversifying existing fundraising approaches as appropriate.

Finally, TI-S will analyze what the best possible approaches are to further knowledge-sharing and exchange as well as capacity development activities. Here we will also look into further tapping into the potential of social media, such as the Chapter Zone as well as making strategic use of the LINGOs[4] platform.

3. Conclusion

This evaluation came at a useful point in time for the AC/DC programme. Being half-way its implementation, the evaluation provided us an opportunity to look back, while using the recommendations to plan for the future. TI looks forward to build on this evaluation in partnership with DFID, other GTF grantees, and wider stakeholders pushing for an improvement to governance policy and practice around the world.

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[4] Learning for International NGOs online platform that provides access to a variety of e-learning courses

Annex 1 –

Feedback on the MTR Findings: Achievements, Challenges and Recommendations

The overall aim of this annex is to provide feedback on the general findings as well as on the resulting recommendations and ways forward. It attempts to complement the evaluation's findings with our own perspective and unpacks the follow-up actions of the management response. While this annex to the management response addresses the key observations and recommendations, it does not attempt to be exhaustive. Some observations are country-specific and will not be addressed in this management response.

The structure of this document is as follows:

A. *Feedback on general findings: achievements and positive lessons*
In this section presenting the headlines of GHK's findings (text boxes), the TI management response aims at complementing some of the evaluation's findings by reflecting on the achievements and positive lessons raised.

B. *Feedback on general findings: challenges and cautionary lessons*
This section reflects on the challenges and cautionary lessons put forth by the MTR.

C. *Feedback on recommendations and ways forward*
Keeping the achievements and challenges in mind, this section of the TI management response provides feedback on the recommendations and outlines ways forward to the extent possible and appropriate.

A.   Feedback on general findings: achievements and positive lessons

The overall level of achievements and innovations to date acknowledged by the evaluators is very encouraging to TI, in particular considering the intermediate results that were expected to be visible at this stage of the programme, as outlined by the MTR Terms of Reference[5].

The achievements and resulting positive lessons learned highlighted by GHK at implementation level are as follows:

Achievements:

- **Local relevance** *is strong in the case of the ALAC concept, which has proven a remarkably flexible framework which can be readily tailored to local needs and demands.*
- **Successful launch** *of ALACs in 12 countries – with, in some cases (Vanuatu), more success than they could handle*
- **Successful** *cases at the* **community level** *in Fiji, Rwanda and Montenegro*
- *Some important* **success in advocacy** *and bringing about new policies in Liberia and Bosnia*
- *The innovation of* **community level outreach** *and monitoring groups to extend the work of ALACs in Nepal, Fiji, Pakistan, Rwanda, Zimbabwe and Kenya*
- *Development of an* **evidence base** *in many of the countries from which it will be*

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[5] These included 1) new knowledge generated, 2) demand for change (advocacy), 3) citizens and communities empowered, 4) partnerships with non-state actors, 5) partnerships with public authorities and 6) capacity of NCs to deliver the programme

> *possible to plan advocacy campaigns and provide a platform for action*
> - *Building **partnerships/coalitions** with other CSOs that share a similar outlook. These are of variable depth but in certain instances, for example Bosnia, they have acted as a multiplier of demand for greater accountability by state institutions*
>
> ***Lessons Learned:***
> - *ALAC **demand**: Responding to a broad set of needs builds trust*
> - *A **grassroots presence** extends outreach through trusted individuals, and improves access and demand*
> - ***Unexpected partnerships** with government open up alternative paths to change*
> - ***Partnerships with CSOs** builds demand for change*
> - ***Horizontal exchange** builds and maintains momentum and long-term networking*
> - ***Coalition building** : research projects that set the stage for advocacy*

As a preliminary comment it is important to note that most of the achievements at this stage of the AC:DC programme relate to the ALACs, which has to do with their operational nature and focus on concrete cases. It is our expectation that, once the NIS Assessments and other evidence-based projects will enter their advocacy phase, they will also demonstrate strong achievements.

Nevertheless, there have been a number of preliminary achievements on the part of the evidence-based advocacy projects. First of all, it has to be noted that the NIS assessment in the AC:DC countries uses a highly **innovative tool**. It is based on a substantially revised and expanded assessment approach, which places a premium of importance on engaging stakeholders throughout the project cycle and uses a more rigorous research methodology than the previous NIS approach. It also seeks to strike the balance between providing a common global framework and being flexible enough to accommodate country-specific particularities. Despite delays in the project implementation schedule, this new tool has been rolled out successfully in the AC:DC countries, as no major challenges with regard to the project approach and methodology emerged. Based on this successful roll-out, the NIS tool is now being implemented/scheduled for implementation in more than 40 countries around the world and has become the governance assessment tool of choice for the entire TI movement.

The revised NIS approach already proved its significant potential for being a springboard for anti-corruption policy and advocacy. For example, despite an extremely challenging environment, the Ethiopian NIS project managed to set up a multi-stakeholder advisory group and engage with further anti-corruption experts and stakeholder during the research phase. Likewise, the Georgian NIS project managed to get the attention of high-level government officials and, crucially, get their buy-in to the project. The NIS's crucial feature of '**participatory research'**, while briefly noted in the MTR, should have received more attention by the consultants, since it is the primary bridge between the research and advocacy phases of the project.

In addition, due to the comprehensive nature of the NIS research, examining the 13 main governance institutions/sector in a country via a variety of data collection tools, a number of valuable '**side-products'** of the research have been produced, which have not been reflected by the MTR report. For example, the Georgian NIS team produced and published the results of their access-to-information

field tests, in which they tested the accessibility of information from a variety of institutions. These results received significant media attention and strengthened the public profile of the entire NIS assessment in Georgia.

Regarding the ALACs, we are pleased that the evaluation confirms the **strong local relevance and ownership** as well as the **impact** of the concept across diverse contexts. Since 2003 the concept has seen a rapid uptake across all regions as currently 61 centres are operating in a total of 46 countries, including the ALACs participating in the AC:DC programme[6]. The MTR report also recognizes the benefits of the flexibility of the model which has permitted the implementation of tactics tailored to each context, while also sharing a robust methodological framework. This observation is particularly important to TI as its very organizational model recognizes the importance of effective local strategies to operate within different country contexts, often against a challenging political backdrop and a shrinking space for civil society in some countries.

The successful **engagement** and **empowerment** of communities, individuals and groups at community level across AC:DC ALACs, as well as the amount of work at local level has indeed been an common trend in our view, as ALACs have expanded to all regions in the world[7]. This is also mirrored by developments in other ALACs. The experiences in the AC:DC ALACs have already contributed to an evolution of thinking and practice in the wider ALAC community, solidifying local level outreach *in addition* to engagement at the national level as a key tactic for ALACs across many contexts. We believe that the AC:DC ALAC experience highlights strong potential for even greater impact and **citizen demand** for better governance in the future, including at the local level. This is important since it is at the local levels where people are often insufficiently aware of their rights and duties as citizens and left with practically no assistance to effectively assist them in their claims. They nevertheless interact often daily with government and service providers for basic services, and demonstrable progress can accomplish significant change and counter deep-seated attitudes of apathy and cynicism in the face of corruption. We expect the initial impact at the policy level also recognized by the evaluators to grow as the project implementation continues. Past experience has shown that higher-level systemic impact builds up over time, as longer-term advocacy initiatives on the basis of ALAC data and cases begin to deliver results.

TI acknowledges and supports the lesson noted by the evaluators regarding the ALACs' **responsiveness to a broad set of needs** and concerns brought by citizens being critical to building trust. On the basis of this broad demand, ALACs then seek to focus their efforts and resources on the most important corruption-related cases, using strategies such as citizen how-to guides, referrals and other tactics to deal with recurring complaints and those that may not fall within the ALAC mandate. In our view, it is important to emphasize that the cases *taken on* by the ALACs mostly do address underlying corruption issues, or point to abuses that permit corruption to take place. Essentially, ALACs seek to resolve concerns that either tackle corrupt behaviour directly, or that may prevent it from happening or recurring. An important task of the ALACs is to counter abuse of power or lack of implementation of the law, and to equally contribute to the legal empowerment of citizens to not

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[6] Status on April 27,2011
[7] This expansion is itself an important contribution of the GTF programme, e.g. in the Africa and Middle East Region the number of ALACs has grown from 1 in January 2009 to 23 in January 2011 and funds have been secured to reach a total of 36 in 2012.

accept corruption as a fact of life and to get involved in the fight against corruption. The ALACs' entry points and measures taken for follow up of their cases however can be highly varied, from addressing administrative irregularities, to issues of transparency and access to information, to grave rights abuses. Therefore, a case will often include a wider area of issues, but definitively contribute to fight corruption.

In line with the assessment of the evaluators, we also consider the **developing evidence base** of people's experiences with corruption through the ALACs in the AC:DC countries as an important mid-term result. The ALAC data provides a unique and new source of knowledge on corruption in the project countries, both of qualitative (case files and stories) and quantitative (database statistics) nature. Reported by victims, witnesses and whistleblowers, these real-life citizen experiences surface new and important aspects of the problem. We agree that it is now key to use this unique data in conjunction with knowledge generated by the NIS and other types of data to identify priorities and pursue concrete advocacy priorities and the development of anti-corruption solutions. As acknowledged in the MTR and noted above, the findings from NIS and other research implemented under the AC:DC programme are now leading to the development of **advocacy strategies**. The continued support in the design and implementation of the strategies will henceforth be an increasingly key area of focus of the programme.

TI furthermore fully agrees with the observation of the evaluators regarding importance of strategic **partnerships** – ideally from a broad range of sectors – to the success of NCs engaged in the AC:DC programme. While clearly dependent on the local context and opportunities as for the type and extent of partnerships, building networks is a key component of the programme[8].

Finally, the evaluation draws a positive lesson regarding the strategic use of the NIS Advisory Group in promoting **coalition building** and ensuring that the research is "live". TI will continue supporting NCs in making the most strategic use possible of the Advisory Group, where relevant and appropriate.

At the management level of the AC:DC programme, two achievements were noted:

- *__Effective management__ of a large, ambitious programme in which NCs all feel well supported*
- *The __innovation of the partnership, advocacy and policy scales__ which have the potential to serve as an incentive as well as a monitoring tool*

The degree of **satisfaction of NCs** is used as a key performance measurement criterion by TI-S while a great deal of time and effort have been invested in the development and implementation of the **partnership, advocacy and policy scales** for effective monitoring and learning. Follow-up steps on TI's monitoring scales are provided in the next section, regarding the third recommendation put forward by the consultants.

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[8] Specifically regarding the ALAC community, we are also currently in the process of developing sectoral concept notes and modules to facilitate application in particular contexts and with new partners (e.g. private sector, development interventions).

B. Feedback on general findings: challenges and cautionary lessons

In this section we analyse the challenges and lessons learned.

Challenges and Cautionary Lessons

The text box below presents the challenges and cautionary lessons provided by the evaluation:

Challenges

- *Translating the evidence base into **strategic advocacy** and **systemic change***
- *Politics: NCs have an innate understanding of these **political dynamics** – the challenge for the advocacy part of the programme is to make use of that understanding to underpin programme results and impact*
- ***Scale and ambition***
- *Rationale of **non-ALAC/ non-NIS** projects*
- ***MSC** methodology*
- ***Gender** mainstreaming*

Cautionary Lessons

- *Prospects for delivering **impact at scale** are limited*
- *Defining and achieving '**systemic change**' needs great care and focus*
- ***Gender** needs to be mainstreamed upfront*
- *There is scope in making **strategic use of politics***

Other issues raised:

- ***Value for money**: A high share of the budget (28 per cent) is spent in Berlin 14 per cent relates to pure programme management and M&E costs; a further 13.7 per cent is allocated to technical support and capacity development for the chapters.*

- ***Sustainability**: on the NIS the question is whether the outputs will sustain in terms of advocacy campaigns and partnerships. The ALACs face short-term unpredictability, but there's a high likelihood for them to continue to be funded. This is underpinned by the strong capacity of NCs and ALAC staff.*

The section below does not strictly adhere to the order of the above challenges as some issues are interrelated and thus grouped; also, some challenges translate directly into the cautionary lessons.

As noted by the evaluators, **policy change** and **impact** as they relate to **strategic advocacy** and **systemic change** is interpreted differently by GHK and TI. While GHK considers that evidence of impact is reflected in a score of 3 or higher (on the policy scale ranging from 1-6), TI considers this element to be highly context specific. That is, a change of discourse in a government official being quite significant in a context such as Venezuela or Zimbabwe, while in the context of more stable political environments only policy implementation would have equal merit.

Moving from **change in policy to change in practice** is indeed a challenge not only in the realm of governance for the AC:DC programme, but for any development intervention and has therefore been included into the strategic priorities of the new TI Strategy 2015. In the new strategy, the third of the six strategic priorities of TI for the 5 years ahead focuses on **more effective enforcement of laws and standards around the world and reduced impunity for corrupt acts**. TI's commitment on this priority translates into a concerted effort at the national level through the work of NCs to utilize

locally adapted methods for researching and advocating at the institutional level and through collaboration with different actors (civil society, media, and the general public) to further this aim[9]. In the next section (*Feedback on Recommendations*) this TI management response highlights how this can best be addressed in the framework of the AC:DC programme.

Furthermore, the **scale and ambition** of the AC:DC programme within the framework of the GTF seems indeed ambitious. That said, the generic purpose, namely 'change in policy and practice' allows for a diversity of policy areas to remain within the scope of the purpose of the programme. The specific NC objectives for change in policy and practice for the ALACs will be demand driven, i.e. based on the analysis of the cases. This means that precise areas of change cannot always be predetermined, but are in fact identified through the lens of the citizens reporting corruption, which we think is key to the success of the intervention. It should also be considered that the advocacy campaigns to date having exceeded the target set by the logical framework, as also acknowledged by the evaluators[10].

On the other hand, TI recognizes the challenge regarding the prospects for **delivering impact at scale** and the second half of the AC:DC programme will be very much focused on leveraging the early impacts at the country level. The key investment of TI-S in the coming years will be to scale up and improve its support function to the chapters.

The challenge noted by the evaluators regarding a more focused approach of NCs on the **political dynamics** in their countries is well noted and will be taken into account throughout the process of assisting chapters in developing advocacy plans. The political dynamics are especially important in countries with problematic, often hostile political environments, and are therefore often taken into account by chapters when planning their advocacy activities.

Although the evaluators characterise TI Zimbabwe as undertaking "muted advocacy", the ALAC project staff have made a judgement that they cannot be too high profile in their campaign for reform given the precarious political context of operations. The TI Zimbabwe chapter requested and benefited from a AC:DC funding of a security training after ALAC staff faced threats of death and detention.

There are other points raised in the analysis of the evaluators, namely regarding the **lack of clarity** in the rationale of some of the "non-ALAC non NIS projects". While we understand this concern we also believe that the diversity of the AC:DC sub-project themes lends to useful comparative analysis of various TI interventions, as already indicated to some degree by the MTR. Similarly, in most cases these projects are seen as highly relevant at the national level. That said, TI-S will collaborate with NCs implementing initiatives other than the NIS and ALAC to increase synergies and compatibility with the main AC:DC programme components.

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[9] For example, in Rwanda this will take place through 4 satellite ALACs that will be launched in 2011 and be located close to rural communities. In addition TI-S will stimulate the integration of the ALACs with other activities to enhance their impact, such as through the integration of the work in the water sector in Kenya in combination with the ALACs and the development pacts.
[10] Year 2 to Year 3 had seen an increase of 78% (from 88 to 157), also acknowledged by the MTR report

Lastly, in order to further **mainstream gender** into the AC:DC programme, the gender task force at TI-S will be consulted regularly and their views integrated in order to operationalise the gender strategy. Furthermore, gender disaggregated data will be used to increasingly integrate gender dynamics within the programme.

TI-S would like to qualify the analysis of the evaluators on **Value for Money**, specifically the choice of conflating the management costs with that of the technical support and capacity development of NCs. Capacity development is an integral part of the day to day support provided to chapters (by the regional departments, the global ALAC team and the NIS team). That is, TI-S' support goes well beyond daily support for project implementation, which is why we argue against the amalgamation of these percentages. Furthermore, this approach is not only well suited to the organizational imperatives of the TI movement but, as confirmed by the evaluation team, it has also led to a high level of satisfaction from NCs regarding the support provided by TI-S. Lastly, GHK also highlights the need to further *bolster* the capacity development component of the project. In our view, reducing the role of regional and programmatic departments working in close coordination with the NCs would have a negative effect on the very capacity development aspect of the programme. Finally, the 14% spent on programme management will go down to 11% by the end of the year.

To illustrate the above point, the following bullet points outline TI-S' routine support and capacity development activities provided to the chapters
• Monthly calls and support in the implementation of NIS studies
• Building project management and especially financial management skills
• Ongoing advice and support on operations, troubleshooting, crisis management, internal governance
• Building fundraising skills and assistance in applications for co-funding at regional and national level
• Knowledge sharing between ALACs and best practices from other sources
• Establishment of knowledge exchange platforms and communication tools
• Development and implementation of a number of trainings on security, advocacy, M&E, legal advice, establishment of a global legal helpdesk
• Organization and facilitation of a global ALAC workshop in November 2009

The global ALAC team has also supported the NCs in developing and publishing ALAC human interest stories, which has also had a positive effect on local fundraising efforts.

Substantial fundraising support is being provided to the ALAC's in order to ensure their **sustainability** and the evaluation also acknowledges that local fundraising efforts have been successful. At the national and regional levels funding has been secured for example from AusAid, the European Commission, the German Foreign Ministry, USAID, PACT Zimbabwe and the Belgian development cooperation. Work on fundraising efforts and diversification of fundraising approaches will continue in partnership between the NCs and TI-S. Building sustainability into the actual **NIS project** by mobilizing stakeholder ownership and engagement, the NIS project draws on a large group of stakeholders through its Advisory Group and the National Integrity Stakeholder Workshop.

The latter brings together over 50 key people engaged in fighting corruption to discuss the findings and devise ways forward.

C. Feedback on Recommendations and Ways Forward

While the previous section provided feedback and analysis from TI's perspective on the findings of the evaluation, this section considers the implications of the recommendations made by the evaluators. This includes those aspects that were raised and acknowledged in the previous section.

- ***Feedback on Recommendation 1: Prepare and implement AC:DC capacity building plan***

TI-S appreciates this recommendation and since the beginning of the AC:DC programme has developed an organisational capacity assessment tool (OCAT). However, precisely because the OCAT was not yet finalised at the start of the programme it could therefore not serve as a base-line for its capacity development support. However, in the second half of the programme, TI-S will tailor the OCAT to the AC:DC programme as appropriate, and use it to gauge NC capacity needs. On the basis of the information provided by the OCAT it will be assessed precisely what training would be useful and what the best approach is to deliver such a training.

Regarding the MSC methodology, while GHK recommends to "*limit the pilot to two or three performing countries, and provide in-country, office-based training*" (p.54), TI-S will first evaluate the current experiences with the tool to identify *why* it has had limited uptake. We will then develop a strategy to integrate and use the tool in synergy with other approaches, and tailored to the NCs capacities and needs. While TI-S is also exploring the possibility to identify local MSC training support, notably in East Africa, we believe that the commitment to implementing the pilot should only occur once (and if) we can address the current challenges of the methodology as it applies to the AC:DC programme.

- ***Feedback on Recommendation 2: Prepare and implement strategic advocacy plans***

TI recognises a clear priority in further following up advocacy based on information contained in individual cases. Trainings were provided to the ALACs during the Global ALAC workshop in November 2009, to the NCs in the Americas region, and to the chapters conducting research (NIS and similar) in March 2011. The outputs included a country-specific advocacy plan and budget. Naturally this should be recognized as a first among several steps to strengthening the capacity and focus of NCs on this topic.

Particularly with the ALACs, there will be an intensified effort this year to define more concrete deliverables in the form of advocacy plans and budgets. TI-S will also continue supporting NCs in the development and implementation of their advocacy plans. The process and approach in assisting ALACs to develop the advocacy plans should preserve the demand driven nature of the ALAC methodology. Advocacy priorities should ideally be identified from a "people" perspective, i.e. that of the complainant.

TI-S commits to ensure to follow up with NCs on their advocacy plans and related activities. This aspect will also feature in the AC:DC Work Plan for year four as the focus of the programme shifts increasingly to an advocacy perspective.

- *Feedback on Recommendation 3: Consolidate and work on monitoring and performance measurement*

Data will continue to be collected and consolidated by the dedicated data analyst in the ALAC unit and by the AC:DC programme management. The new ALAC database is designed for use in decentralised settings. We are currently in the process of testing the beta-version of the new software, and are evaluating how data about estimated number of beneficiaries for collective clients can best be integrated.

Regarding the annual report, the recommendation on data presentation is particularly welcome and will be used as a part of the next reporting period. As for the review of the quarterly narrative reporting template, the new programme manager will give due consideration to this suggestion. This needs to be weighed carefully against the exponential cost of introducing new templates when NCs after a long process now feel comfortable with the current format. The focus will remain on the key results and incipient impact. However TI-S will tackle the further development of these tools by making use of in-house capacities, rather than contracting external consultants.

- *Feedback on Recommendation 4: Develop thinking on use of ALAC community structures*

We certainly acknowledge how powerful it has been in certain country contexts to use community mobilisation structures to strengthen awareness-raising activities in-country, as is being done by several NCs. Outreach and engagement with local communities is a strong common thread in the work of ALACs across highly different contexts and we are seeing various different models develop in NCs who adapt their outreach strategy to specific opportunities and challenges in the national context. Some are using pre-existing organisational structures such as offices at the sub-national level, partnerships and programmes to extend their reach. Others are developing new tactics, such as mobile ALACs, community groups, online and technology-based outreach in line with available funding and other resources. We are also promoting integration and linking-up of these approaches with other chapter activities to ensure sustainability. Clearly, TI sees it as a priority to enable the sharing of experiences with these various tactics, and agree that they have vast potential for the mobilisation and articulation of citizen demand against corruption. As it emerges from global experience, we will incorporate typologies and experiences into standard ALAC capacity building resources.

Rather than rolling out one particular outreach model for all, TI-S commits to thoroughly documenting the variety of models to be able to share the experiences within the ALAC community. NCs would be able to compare and select those tactics most appropriate to their context. Alongside standard training modules and resources, this will include documentation of approach on TI's new Sharepoint platform 'Chapter Zone' to facilitate chapter to chapter communication.

- *Feedback on Recommendation 5: Use gender disaggregated data to strengthen gender dimensions*

This is a very useful recommendation and has indeed been identified as an area for improvement across our work by a TI-S gender audit undertaken early 2010. We look to move forward on this while we embark on the implementation of the TI-S 2015 implementation plan. TI also agrees to use ALAC data to further inform our thinking on gender and corruption. At the same time, TI-S will work in conjunction with ALACs to ensure that all, including the most vulnerable have equal information about and access to the ALAC services, while preserving the fundamentally demand-driven nature of the intervention.

- *Feedback on Recommendation 6: Consider targeting of vulnerable and marginalised communities and individuals*

This recommendation fits well with the new focus of the TI Strategy 2015 regarding **increased empowerment of people** and the recommendation is well taken in terms of operating highly inclusive outreach models of intervention. Nonetheless, one note of caution needs to be raised on how to approach this recommendation. Regarding the ALACs, it will be important to continue ensuring equal access to the ALAC services by all groups of society. In this context it will be important to analyse the data to get a better understanding of the ALAC clients and how to best reach a diversity of clients. The focus at present would have to be on ensuring that the most vulnerable and poor have equal information about and access to the ALAC services. However, with regard to work on individual/collective cases and advocacy, it is once again essential to emphasise the importance of preserving the demand-driven approach of the ALACs. Experience to date suggests that significant changes in anti-corruption work can be rooted in concerns brought by a highly diverse set of clients, from the poorest to relatively well-placed whistleblowers. This element of "discovery" of real-life hot-spots of corruption and of potential for systemic change is inherent to ALACs and, we believe, a key ingredient of their relevance and success.

- *Feedback on Recommendation 7: Developing accountability frameworks*

As noted by GHK, adopting a broader demand-side governance approach, with various existing tools, such as has been done in Kenya can be further replicated. The examples here include citizen report cards as well as creating a direct link between research and advocacy with the complaint mechanism of the ALAC[11]. Through this integration the ACDC programme is contributing to the establishment of an effective accountability network. Here a similar approach as for Recommendation 4 can be adopted. That is, the key is promoting and facilitating the exchange of experiences and approaches between NCs.

- *Feedback on Recommendation 8. Log frame adjustment*

The logical framework will be adjusted in coordination with NCs to ensure that they can commit to delivering any additional or modified result areas. In principle, the *NC Capacity* result area will be adjusted to focus more on chapter advocacy capacity, with the advocacy scale tool serving as a

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[11] The TISDA programme (Transparency in Service Delivery) is actively integrating its research and advocacy work in the water sector with the complaint mechanism of the ALAC in Mombasa. Water companies are entering into development pacts and using the ALACs as the mechanism to report the complaints that help to understand whether the water company is following up on the development pact and to address grievances of their customers.

means of verification. An additional result on community and individual demand for change will be added. This will include the indicator on ALAC contacts and cases, as well as the number of participants at outreach events, which should be feasible for all NCs to track and record in the quarterly narrative reports (this will require an adjustment to the narrative reporting template). For the ALACs, this is easily tracked in the new ALAC database.

The need and feasibility of a "demand scale" will be further explored, with an awareness of the challenges posed already by the new monitoring tools introduced by the programme. While we need to evaluate carefully how a fourth scale can be integrated into existing processes (reporting) and tools, we see value in exploring the "citizen demand" dimension in more depth. We certainly consider this an important ALAC objective and we are interested in understanding how best to document and evaluate impact in this area in the future.