Mid-term Evaluation

Transparency International's Asia Pacific Programme 2016-2019

Final Report

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List of abbreviations

ACA	Anti-Corruption Agency
ACU	Anti-Corruption Unit (Cambodia)
ADB	Asian Development Bank
ALAC	Advocacy and Legal Advice Centre
AP Programme	Asia Pacific Programme
ASEAN	Association of Southeast Asian Nations
CIABOC	Commission to Investigate Allegations of Bribery and Corruption (Sri Lanka)
DFAT	Australian Department of Foreign Affairs and Trade
FFA	Forum Fisheries Agency
ICAC	Independent Commission on Anti-Corruption
IMO	International Maritime Organisation
INS	Institutional and Network Strengthening
ISP	Institutional Support Programme
LDC	Least Developed Country
MFAT	New Zealand Ministry of Foreign Affairs and Trade
MIC	Middle Income Country
NC	National Chapter
OGP	Open Government Partnership
PIC	Pacific Island Country
PIF	Pacific Island Forum
RTI	Right to Information
SDG	Sustainable Development Goal
SI	Solomon Islands
SIDS	Small Islands Developing States
TI-S	Transparency International Secretariat
ToR	Terms of Reference
TT	Towards Transparency (Vietnam)
UNCAC	United Nations Commission on Anti-Corruption
UNDP	United Nations Development Programme

EXECUTIVE SUMMARY

Transparency International Secretariat (TI-S) in Berlin is supporting a multi-year anti-corruption programme in the Asia Pacific, 2016 – 2019 (the AP Programme). The AP Programme is funded by the Australian Department of Foreign Affairs and Trade (DFAT) and builds on previous TI programmes and anti-corruption projects in the region. The programme includes regional and national projects and activities. The regional interventions are coordinated by TI-S, sometimes in collaboration with a Transparency International National Chapter (TI NC). The national activities are planned, implemented and owned by the ten NCs in the respective countries.

The AP Programme seeks to contribute to policy and behaviour change across the region, leading to more effective anti-corruption enforcement. The strategy to achieve this rests on the assumption that institutional transformation is possible when there is pressure for change. To make this happen, the current AP Programme is structured around four programme wide change goals:

1. Enhanced Social Accountability
2. Strengthening Anti-Corruption Legislation
3. Strengthened Enforcement of Anti-Corruption Systems and Institutions
4. Demonstrated Business Integrity

An additional component, Enabling Impact, underpins the four change goals. Its intention is to ensure a sufficiently strong and skilled network of national chapters.

To assess the performance and achievements of the AP Programme thus far, TI-S commissioned a mid-term evaluation. Additional objectives of the evaluation were to: identify strengths and weaknesses of the AP Programme; generate lessons learned and good practices from the programme's work; provide clear forward-looking recommendations that can guide TI-S and NCs in developing and improving the rest of the activities for the remaining period; and review the systems in place to improve gender equality as well as drive innovation and learning across the network. Finally, the evaluation was to look more deeply at the issues and approaches to further supporting TI NCs in the Pacific region.

The evaluation took place September to November 2018. The data collection consisted of: consultations with TI-S staff in Berlin; in-field interviews in Papua New Guinea, Solomon Islands, Cambodia and Sri Lanka; phone-interviews with NC staff in Vietnam and Nepal and with other external stakeholders; two surveys; and document reviews. Based on this data, the evaluation has made the following conclusions:

Relevance

The AP Programme is relevant for, and aligned with, TI-S and DFAT's current priorities and strategies. However, for the future direction of the programme, it will be necessary to consider alignment with TI's global strategic focus and global advocacy priorities relating to grand corruption, dirty money and political integrity, as well as its relevance to Australia's enhanced focus on the Pacific. The AP Programme is relevant for the NCs, as well as for addressing the dominant corruption issues and trends in the region and in the countries. The alignment of the change goals to the NCs' strategies is for the most part strong, but for one goal, Demonstrated Business Integrity, for which there is a lower degree of NC uptake.

Effectiveness and Impact

The pressure on civil society and politicisation of anti-corruption efforts in several Asian countries presents a challenging environment for TI and has impacted on its ability to implement work and to reach some intended outcomes. Despite this, the AP Programme has made steady progress towards most of the intermediate outcomes in several countries and at regional level.

For goal 1, social accountability, there is evidence that opportunities for citizens and communities to hold leaders and institutions accountable have been raised, and across the programme a high number of awareness raising activities have been completed. Some countries have successfully integrated social accountability actions performed by the Advocacy and Legal Advice Centres (ALAC) and building pressure for change at the local, sub-national and national levels. However, despite overall good progress at programme level, this progress is varied across the participating countries. Several countries need to better integrate the different aspects of social accountability, such as aiming for better reach through innovative mechanisms, coupled with

facilitating citizens to more effectively hold decision makers accountable at the local, sub-national or national levels.

For goal 2, strengthened anti-corruption legislation, there is substantive progress towards the intended targets, and progress towards the intermediate outcomes 'new anti-corruption legislation tabled and passed' and 'improvement of weak existing anti-corruption' is very steady. In terms of strengthened enforcement of anti-corruption mechanism (goal 3), the intermediate outcomes and the results in this area are likely to come into fruition within a few more years, but there is strong progress against the strategy and plan. For goal 4, demonstrated business integrity, there are some relevant initiatives at country level, primarily small projects at the inception stage. Goal 4 at programme level therefore has further to go before reaching the intermediate outcome 'Improved business regulation is supported'.

The programme lacks some clarity pertaining to the use of terminology for "target groups" and "beneficiaries", and this presents challenges in attributing results and demonstrating impact, as it is at times unclear where and with whom changes are expected to occur. Notwithstanding this challenge, an attempt to assess the AP Programme's impact against TI's impact matrix leads to the conclusion that, thanks to innovative approaches and a high number of outreach and awareness activities by NCs and their partners, there is already *some* behaviour change, with an increased case load for people seeking redress against corruption. Due to the good progress in strengthening anti-corruption legislation, there are in some countries already better institutional processes in place, and a degree of policy adoption and amendment in government. There is, however, no evidence of this amongst the business sector yet and more efforts are required in enforcement and in instilling those changes in businesses. The results achieved can be partially attributed to the capacity support materialised through the Enabling Impact component, either through direct coaching and facilitation support from TI-S, or as part of the chapters' national AP Programme budgets.

Efficiency

The AP Programme has provided efficient collaboration opportunities and there is a strong sense of collegiality and shared mission across the chapters. The programme and organisational structure is to a large degree conducive to learning, innovation, participation and ownership. The collaborative approach from the current TI-S AP Programme team, as well as TI-S resources and support, have impact and are appreciated. However, to strengthen their efficiency it will be important to strike a better balance between offering Enabling Impact as an untied capacity strengthening component and tying it to the change goals. The lack of a stand-alone capacity strengthening initiative in this programme period has meant that some chapters that did not tie sufficient Enabling Impact budget to their goals have not been able strengthen their capacities to the same extent. In addition, some processes can be improved at the programme level, such as structured training, reporting and support to smaller chapters relating to developing concepts for a new programme.

Sustainability

For most goals, more time is needed to cement the results and initial changes achieved. Nevertheless, it is possible to conclude that a few conditions that are widely accepted as key to sustainability are in place in several chapters. These are: needs-driven development; technical knowledge and competency amongst most NCs and actors involved; shared vision; and ownership and participation.

For many NCs, core funding is the bottom line concern for sustainability. Without it, focus is diverted from core objectives to pursuing funding. It is therefore essential for TI-S and DFAT to assess the ease and feasibility with which a NC can attract core funding from other sources in a particular country, and to determine whether a specific category of countries can or should be allocated core funding from the AP Programme.

Gender

Progress has been made at mainstreaming gender into the programme at NC level. However, the awareness of the relevance of gender is varied, and the degree to which NCs work consciously with gender mainstreaming is inconsistent. Some NCs are actively trying to apply a gender perspective to their activities, while other NCs do not see this as relevant. While there is no institutional approach to gender mainstreaming at TI-S, there has at times been a very good exchange between TI-S and NCs on how to enhance a gender perspective in specific projects, and TI-S provides some tools and resources.

Monitoring, Evaluation and Learning

The AP Programme's monitoring, evaluation and learning (MEL) has improved since the final evaluation of the previous programme. TI now has an impact matrix and several NCs are using this. In addition, several NCs engage in self-reflection and learning through regular participatory meetings at country level, which contributes to learning, innovation, ownership, and sustainability. Other NCs, however, are not using the impact matrix. The impact matrix does not use targets from the AP Programme results matrix, used in the quarterly reports, and TI-S could consider to consolidating the two systems, while at the same time review targets and indicators to ensure they measure effect and results, and not outputs or processes.

Key recommendations

The key recommendations are noted below and apply to both the current and any future programme. A full list of the recommendations are found at the end of the report.

1. **TI-S to reflect on key strengths and alignment with TI's global strategic priorities and advocacy goals.** In light of the new advocacy global level priorities for the TI movement, assessment of the AP region's and the NCs' added value and key strengths, what this means for TI's global level initiatives, and how the key strengths can contribute to TI's proposed global advocacy strategy for dirty money and political integrity.

2. **TI-S to review the Theory of Change, results framework, and terminology for target groups and beneficiaries.** The Theory of Change would benefit from a review of its causal chain and the change intended with different interventions, as well as how to strengthen the lateral connections between the goals. Stronger results-oriented indicators are necessary, which to the extent possible should avoid external dependencies. To be able to measure and determine TI's impact, it is essential to have a strong and deliberate beneficiary description in results and outcome statements, which would allow for follow up the intended results for different target groups and beneficiaries.

3. **TI-S to balance Enabling Impact tied to the change goals with general capacity strengthening support.** Consider the right balance between Enabling Impact tied to the change goals and a stand-alone capacity strengthening component. This will support weaker chapters to reach their potential by utilising this budget component better. Standardised centrally driven capacity building and needs driven approaches need to be better balanced as well, combining a programme-driven structured approach with a demand-driven responsive approach, to ensure there is a minimum standard of skills and capacities within all chapters.

4. **TI-S to finalise and operationalise the TI's draft Pacific strategy, with a regional and national approach.** Focus on supporting existing TI chapters in the Pacific, as well as leveraging off regional opportunities, as there is a strong need for an intensified regional approach and partnership for anti-corruption in the Pacific.

5. **TI-S to develop a funding formula.** The formula will benefit chapters that operate in a country context in which access to alternative core funding is very difficult. The formula should take into account the feasibility of accessing other core funding, and the demonstrated effectiveness and likelihood of achieving impact, despite funding problems.

6. **TI-S to establish a split funding approach (project/core funding), and pooled funding**. A new AP Programme should primarily consist of project or activity funding, with a small portion for core funding for vulnerable chapters. Explore mechanisms to put in place to allow for other donors other than DFAT to contribute to this pool for the Pacific chapters.

7. **TI-S to commission a thematic impact assessment of Social Accountability**
   Social accountability is a big investment area. For accountability and learning it is important to properly capture the impact of the investments, and its contribution to people seeking redress, to community action, and to anti-corruption activism. This involves impact evaluation in all or several of the countries that contribute to this goal, with a focus on consulting <u>beneficiaries</u>. This should be done at the end of the current programme, either as a distinct part of the final evaluation or as a separate evaluation.

8. **NCs to use more partnerships and more effective communications and campaign strategies for better reach.** Some chapters have established good partnerships that allow them to cover broader geographical areas. Other chapters need to do much more in this regard, to raise the awareness and contribute to more people taking action. Some chapters use the best of modern technology and up to date campaign strategies, partnering with media outlets or entertainment industry to better capture people's attention and interest, as well as using mobile technology that allows people to report cases online. These examples could be adopted to improve the performance of other chapters that are still mainly using print publications.

9. **TI-S' and NCs' Strengthened Anti-Corruption Legislation initiative.**
   Build on good experience made so far, but narrow the focus to countries where this goal is a strong priority, such as in the Pacific, and/or where this work is strongly required but where it is not possible to get funding from other sources (as some NCs are involved in legislative work regardless of the AP Programme). Consider making lateral connections to the other goals more explicit, to enable the programme to be more integrated and improve management for shared outcomes.

10. **TI-S to consider for Strengthened Enforcement of Anti-Corruption Mechanism**
    Continue with the programme according to the current strategy, informed by the new Anti-Corruption Agency assessment in 2019, in order to see results towards the key outcome. Assess further how the tool can be used for non-willing ACAs. Consider how the anti-corruption enforcement work in the AP region can contribute to TI's global advocacy goals.

11. **TI-S decision regarding Demonstrated Business Integrity**
    Determine whether there is sufficient capacity at both NCs and TI-S to continue with this goal and the feasibility for scaling up. To make a case to continue, finalise the regional work with developing an overarching strategy. This should include connections to the other programme goals, such as policy coherence for efficient and accountable business practices, and Rights to Information as part of accountable business practice. Establish how business integrity can contribute to TI's new global advocacy direction and how it can work in coalitions and regional partnerships for strengthened impact.

1   INTRODUCTION

Transparency International (TI) runs a multi-country anti-corruption programme in the Asia Pacific (the AP Programme 2016-2019) from its secretariat in Berlin. The programme is funded by the Australian Department of Foreign Affairs and Trade (DFAT) and builds on a previous programme period, 2011-2015.

The AP Programme seeks to contribute to policy and behavioural change in the Asia Pacific region through regional and national interventions coordinated by TI Secretariat (TI-S). In combination with regional initiatives, in the current programme period, ten TI National Chapters (NC) have implement projects and activities that contribute to four change goals. These four goals are: enhanced social accountability and the role of civil society; strengthened anti-corruption legislation; strengthened anti-corruption organisations and enforcement of anti-corruption systems; and demonstrated business integrity.

TI-S commissioned a mid-term evaluation of the current AP Programme. The purpose of the evaluation was to provide an external and independent review that assessed the performance and achievements in meeting the expected results and contributing to positive change. Additionally, the evaluation was to assess whether the grant led to any unforeseen positive or negative results.

The evaluation was to have both an accountability and a learning, forward looking perspective. In addition, a formative, *ex-ante* component concerned assessing the feasibility and relevance of a stronger TI presence in the Pacific.

The mid-term evaluation was carried out in September – November 2018, by independent consultant Pia Karlberg. The evaluation and data collection took place at TI-S in Berlin, through site visits to Papua New Guinea, Solomon Islands, Cambodia and Sri Lanka, and by phone and Skype interviews. The data collection has included both quantitative and qualitative methods, to allow for triangulation of evidence, such as consultation with 77 TI-S and NC staff, partners and external stakeholders, data collection through surveys to NCs, and to partners and stakeholders, and review of some 60 documents.

This report summarises the findings from the mid-term evaluation of the AP Programme. The report has the following structure:

- section 2 outlines the evaluation methodology and the evaluation scope;
- section 3 provides an overview of TI's AP Programme components and financial performance;
- section 4 discusses the main findings for the current AP Programme according to the evaluation criteria and how the regional interventions and the chapters have contributed to goal fulfilment;
- section 5 describes findings relative to the Pacific; and
- section 6 provides recommendations for the current programme and the Pacific.

2   EVALUATION METHODOLOGY

2.1   Objective and focus

According to the Terms of Reference (ToR) for the evaluation, the objectives of the assignment were the following:

- Provide an objective assessment of the achievements and results;
- Identify weaknesses and strengths of the programme;
- Generate lessons learned and good practices from the programme's work;
- Provide clear and forward looking recommendations that can guide TI-S and National Chapters in developing and improving the rest of the activities for the remaining period; and
- Review the systems and processes in place to improve gender equality as well as to drive innovation and learning across the network.

For DFAT, the AP Programme's funder, the evaluation was also to assess approaches to supporting TI Chapters in the Pacific, in order to inform a future Pacific strategy relating to TI funding in this region.

The evaluation focused on how the regional interventions and the NCs contributed to the overarching programme goals, in other words, how the programme as a whole is performing, as opposed to horizontally comparing different country programmes and projects which are very different in terms of economic, political, and institutional context and design.

2.2   Scope

The mid-term evaluation had a summative, a formative and an ex-ante purpose. The summative and formative aspect of the evaluation covers the period from the programme start, 2016, until mid-2018, with the purpose of demonstrating results achieved and to provide recommendations for adjustments for the remaining programme period, until 2019, and beyond, into a new programme period. For the evaluation of TI's presence in the Pacific, all three evaluation purposes have been pursued, the summative and formative to inform the ex-ante assessment; in other words, assessing the relevance and feasibility of an enhanced TI presence in the Pacific, and of enhanced support to the TI chapters in this region.

While the summative and formative focus had equal weighting when assessing the Asian chapters and Papua New Guinea, in the Pacific the weighting has been in favour of a formative, forward looking focus. The field visits to the Pacific had in that sense a feasibility purpose, in order to inform a future Pacific strategy for TI-S and DFAT.

The evaluation assessed all of the programme. However, field visits were conducted to four countries, which meant that there is more evaluation data and stakeholder experiences to draw on for those countries.

In addition to the AP Programme's four overarching programme goals, over 50 percent of the programme budget is for "Enabling Impact". The purpose of this budget allocation is to ensure that there is a skilled network of NCs, and that these have sufficient and robust internal capacities, are able to diversify their funding base and to engage regionally in global anti-corruption campaigns. This component has been assessed in terms of how it has enabled the chapters to work efficiently and effectively with the four change goals, as well as whether it has contributed to a stronger TI movement.

The analysis of the findings has considered recommendations from the final evaluation of the previous pro-gramme period.[1] The key recommendations from that evaluation were a stronger focus on results and strengthened chapter ownership; a stronger intervention logic linked to TI's 2020 global strategy; a more de-centralized approach allowing chapters to have a larger ownership influence on the support received. These have been assessed to determine whether the recommendations adopted has led to any changes.

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[1] DeveWorks (2014). *Final evaluation of TI Asia Pacific Programme.*

2.3 Method and approach

2.3.1 Methodology

Evaluation criteria

Of the five evaluation criteria listed in the ToR – Relevance, Effectiveness, Impact, Efficiency and Sustainability – in consultation with TI-S it was determined to focus on **Relevance** and **Effectiveness**. The Impact, Efficiency and Sustainability criteria underpinned the key evaluation questions as well, but to a lesser degree.

The relevance and effectiveness criteria are closely linked, as a programme cannot be effective if it is not relevant. Programme effectiveness relates to the level by which the (relevant) activities of a programme produce the desired effect. In other words, the extent to which the NCs have achieved the expected outcomes for the four change goals. It is therefore essential that the two criteria are considered in tandem, and are somewhat set apart from the other criteria. Impact can usually be assessed a few years after an investment, and requires a different focus on depth, and it has therefore not been possible to do a proper impact and beneficiary assessment of the programme within the scope of this evaluation. However, the findings are discussed in the context of TI's Impact Matrix, and the extent to which policy and institutional change, and behaviour change has occurred and if so to what extent TI has contributed to this.

There are different constraining factors in the Pacific compared to Asia, such as common Pacific problems around staff retention and funding sources. Therefore, a focus that combined requirements for **effectiveness** and **sustainability** guided the Pacific part of the evaluation.

All five evaluation criteria were underpinned by key evaluation questions that have been used to collect and analyse the data.

Mainstreamed perspectives

A *participatory,* and a *gender* perspective and approach were mainstreamed into the key evaluation questions. This meant, for example, that the evaluation criteria relevance and effectiveness were assessed in terms of who had been involved in and consulted for planning and design, and who had benefitted and who had not from different programme interventions. For gender, questions asked were whether gender had been a concern in the design and planning of the programme activities, and whether sufficient effort had been done to ensure that both women and men were reached by the interventions, and whether the results had been different for women and men respectively.

2.3.2 Evaluation data

The data that the evaluation collected has consisted of the following:

- *Document review of some 60 documents and reports:* these included TI internal reports and strategy documentations, NCs' quarterly reports and financial statements, DFAT strategies and Aid Quality Checks, various research and policy papers from different donors and international organisations, and other anti-corruption research articles. Refer to full literature list as Annex 1 [in final report].
- *Inception meeting and interviews at TI-S:* these were held with AP Team staff members, to finalise the evaluation scope and discuss priorities and challenges within the different change goals, and across the programme.
- *Surveys:* Two different surveys were designed, disseminated and collected. One was addressed to NCs, the other to partners and stakeholders. Each chapter was encouraged to ask for 2-3 staff to respond to the survey, in order to avoid an exclusive Executive Director perspective. This resulted in 15 responses on the NC survey. For the partner and stakeholder survey, this was disseminated through each NC, with the instructions to send it to stakeholders and/or beneficiaries that the NC had been working with. This resulted in 10 responses.

- *Field visits and interviews:* Field visits were made to Papua New Guinea, Solomon Islands, Cambodia and Sri Lanka, where approximately 67 interviews with NC staff, implementing partners, donors and some stakeholders were undertaken.
- *Follow-up phone and skype interviews:* with TT Vietnam and TI Nepal, as well as with AP Team members

There are some limitations with the data collected. Due to the relatively limited scope of this evaluation, it was not possible to sufficiently consult beneficiaries of TI's activities in-country. This is a clear limitation in terms of assessing beneficiary effectiveness and impact.

In terms of the surveys, considering there are ten NCs that implement projects that fall under the AP Programme, the response rate of 15 surveys collected is considered relatively good. Because of the anonymity clause of the surveys, it is not possible to know which NCs have responded. While this provides an ethical protection of the survey participants, it does pose some limitations as to what can be inferred from the surveys. The results from the survey is therefore only used to contrast other findings or to provide additional but not key data on specific findings and trends. It is not possible to draw any conclusions from the survey alone.

2.3.3 Comment on targets

Setting and evaluating targets in anti-corruption work is inherently challenging. Firstly, using a baseline, how do you determine what is realistic and sufficiently ambitious, especially for new programme areas? This difficulty is reflected in the fact that TI updated the targets for 2019. Secondly, if a particular target is reached and even surpassed, is this a success indicator, or does it mean that the target was too low?

The purpose of using targets in democracy, governance and anti-corruption work is to put a quantitative measure on socio-political change processes. However, using targets is only meaningful if it is combined with a qualitative effect and impact assessment, analysing the context in which these targets were being achieved or not, whether structural changes in the political environment took place, due to which it would have been impossible to achieve a target, or conversely, despite which targets where able to achieved. This complication has been accounted for and contextual analysis done in the assessment of results achieved.

The challenge of measuring progress in the anti-corruption work is also the reason why TI has introduced its impact matrix. In its publication *Are we on the road to impact?* it is noted that, "The impact matrix was purposively designed to do away with indicators. However, many donors and project managers still prefer to use them", to justify why the organisation is using a target (quantitative) approach to measure results, as well as impact assessments (qualitative).

3 ABOUT THE ASIA PACIFIC PROGRAMME

3.1 Programme context

The partnership between TI and DFAT in the Asia Pacific region started in 2004. Since then, DFAT has supported individual TI Chapters in the region, as well as TI-S in their anti-corruption work in the region. The relationship was formalised in 2009, when a five-year Partnership Framework on Anti-Corruption in Asia Pacific was signed by both parties. The overall objectives of this Partnership framework were to seek:

- the establishment of a strong anti-corruption movement in the Asia Pacific region, including through global and regional anti-corruption initiatives;
- stimulation of local demand for transparent and accountable government and reduced corruption in the Asia Pacific region; and
- development of a reputable source of corruption knowledge and diagnostics in the Asia Pacific region.[2]

The previous and largest programme phase supported by DFAT was the AP Programme 2011 – 2015, and was guided by the overall objectives in the Partnership framework from 2009. As demonstrated by an end of programme evaluation in 2014, this programme resulted in growth of the integrity and anti-corruption movement in Asia Pacific. Looking further back, to assess the progress achieved since 2004, it is possible to witness a professionalisation of TI chapters in the Asia Pacific region. The strength of the TI movement is its independent chapters, and the flexible approach offered by TI-S. Recommendations in the same evaluation for a further programme phase, 2016 – 2019, included a stronger focus on results and strengthened chapter ownership; a stronger intervention logic linked to TI's 2020 global strategy; and a more decentralised approach, allowing chapters to have a larger ownership influence on the support received. [3]

3.2 Programme description

The current AP Programme (2016 – 2019) has placed its focus on external changes sought. It therefore covers four change goals under which several outcomes are envisioned. These are:

1. **Enhanced social accountability and the role of civil society**
   - Citizens will be supported to voice their corruption complaints and seek redress for their grievances.
   - Space for civil society in legislation, policy and practice will be preserved and mechanism to protect civil society activists will be strengthened.
2. **Strengthened anti-corruption legislation**
   - New anti-corruption legislation tabled and passed.
   - Improvement of weak existing anti-corruption legislation.
3. **Strengthened anti-corruption organisations and enforcement of anti-corruption systems**
   - Relevant public institutions are supported to be more transparent and accountable.
   - Anti-corruption agencies are strengthened to be more effective.
   - Improved public service delivery is supported.
4. **Demonstrated business integrity**
   - Improved business regulation is supported.

A fifth pillar of the programme is **Enabling Impact**, which aims to continue strengthening internal capacity, as well as the anti-corruption voice and advocacy. Based on the experience of the previous programme, and notwithstanding some aspects of the enabling impact component, the current programme is seeking a shift from organisational capacity building to advocacy and strengthening of anti-corruption voices. It also seeks a

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[2] Transparency International Secretariat (2011). *Transparency International Asia Pacific Programme: Towards Effective Leadership & Reforms in the Fight Against Corruption. Funding proposal*.

[3] Transparency International Secretariat (2015). *Transparency International's Asia Pacific Regional Programme: Effective and Accountable Governance for Sustainable Growth. Programme Document.*

shift from strengthening anti-corruption systems to strengthening enforcement.[4] This is in recognition of slower progress on enforcement which means that corrupt actors often escape enforcement action, despite progress on new and strengthened anti-corruption laws across the region. Finally, the programme is seeking to encourage governments to show leadership in fighting corruption, and to measure performance of leadership.

Interventions towards the goals are different across the region, with an aim of TI to build flexibility of approach into the programme design, and to allow for national contributions to be developed locally, reflecting current and constantly changing political situations.[5] Each national programme is different in nature and focus, usually but not always driven by a TI NC. Country programmes vary in size and composition. Some are more reliant than others on implementing partners, some countries work with all four change goals, whereas others focus on one or two of the goals.

Aside from Papua New Guinea, the chapters in the Pacific are currently not implementing any projects that are funded from the AP Programme, even though they are part of the overall TI movement and get programme support from TI-S from the Enabling Impact component. If proved relevant and feasible, TI-S is hoping that the Pacific chapters will form part of a future AP Programme.

The original contributions to the four different TI-S goals by the ten countries represented in the current AP Programme are depicted in the below table. Since 2016, some chapters have changed some goal areas, or focus within the goals, due to either the external political environment, or internal capacity issues.

TI-S AP PROGRAMME	East Asia	South Asia					SE Asia			Pacific
Goal 1: Enhanced Social Accountability	*Mongolia*	*Sri Lanka*	*Maldives*	*Pakistan*	*Bangladesh*	*Nepal*	*Cambodia*	*Indonesia*	*Vietnam*	*PNG*
Citizens will be supported to voice their corruption complaints and seek redress for their grievances		x	x	x		x	x		x	x
Space for civil society in legislation, policy and practice be preserved, mechanisms to protect civil society activists will be strengthened		x	x	x			x		x	x
Goal 2: Strengthened Anti-Corruption Legislation										
New anti-corruption legislation tabled and passed			x	x			x		x	x
Improvement of weak existing anti-corruption legislation		x	x	x			x		x	
Goal 3: Strengthened Enforcement of Anti-Corruption Mechanisms										
Relevant public institutions are supported to be more transparent and accountable	x	x	x	x	x			x		x
Anti-corruption agencies are strengthened to be more effective	x	x	x	x	x			x		x
Improved public service delivery is supported		x		x		x				x
Goal 4: Demonstrated Business Integrity										
Improved business regulation is supported	x	x					x	x	x	
Enabling Impact										
Internal Capacity, Robust internal capacity / presence and coordinated activities	x	x	x	x	x	x	x	x	x	x
Strong Voice: Strengthen anti-corruption advocacy and voice	x	x	x	x	x	x	x	x	x	x
Sustainability: Sustainable and diversified support	x	x	x	x		x	x	x	x	

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[4] Ibid.

[5] Ibid.

3.3   Financial overview

3.3.1 Programme budget

In the budget of the AP Programme 2016-2019, Enabling Impact is by far the largest budget item. Goals 1 and 3 are almost equally big, in terms of budget. Goal 2 is a focused goal, and potentially not as costly for the results it generates. Goal 4 is very small in relative terms, a reflection of a new area for this programme and with what may be considered a pilot focus.
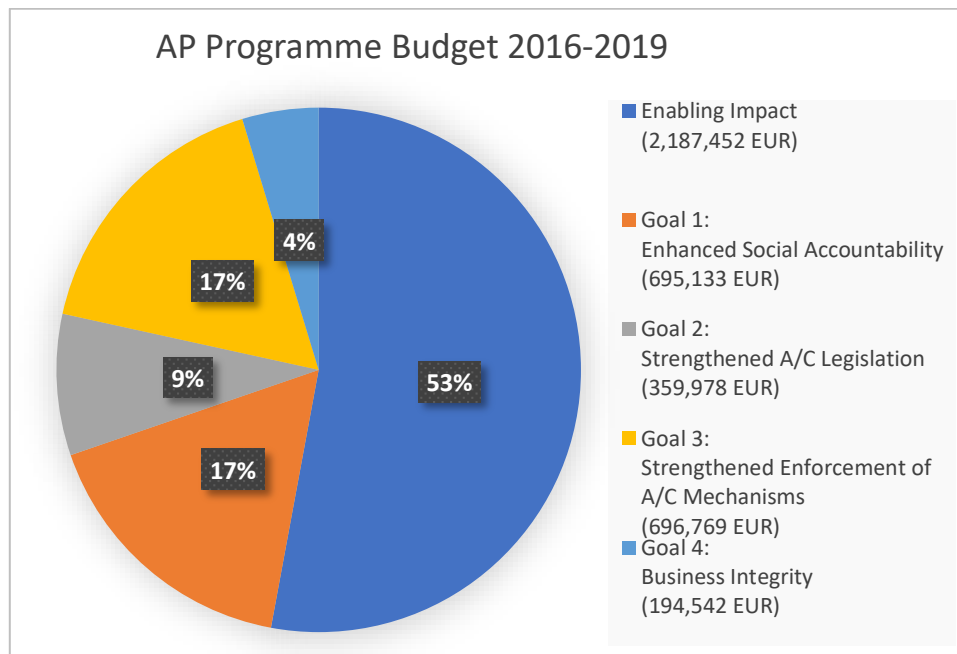
3.3.4   Budget spend

The total budget for the 2016-2019 AP Programme was 4,133,873 EURO, with relatively even spread for the four programme years. As at 30 June 2018, the budget versus the actual spend is represented in the figure below.
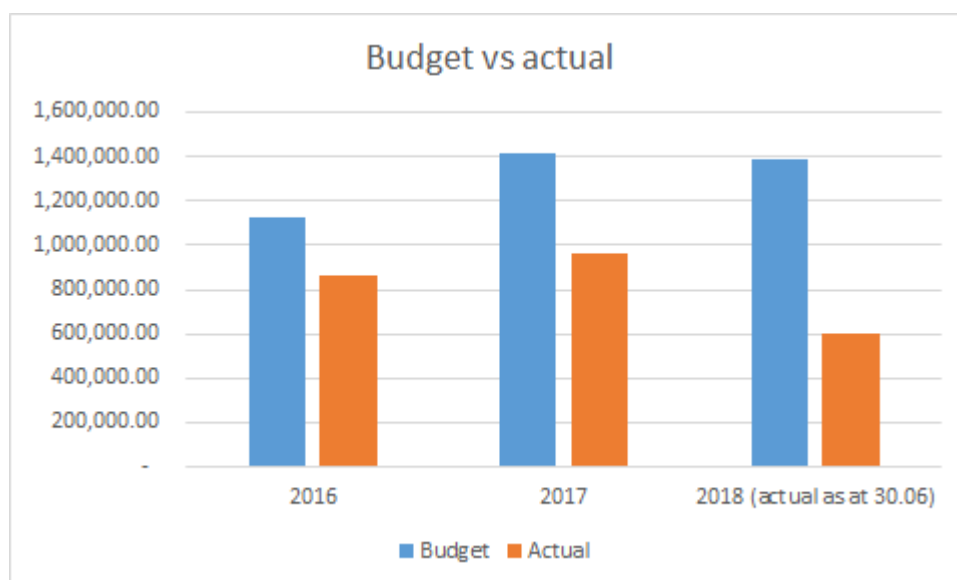
There was an underspend by 23 percent in 2016 due to several factors. National level funding was only final-ised in mid-2016, which meant that in reality NCs planned smaller budgets for 2016 and larger budgets for 2017, in contrast to the programme's overall budget. Furthermore, staff changes at TI-S resulted in an under-spend on a few budget lines. In addition, there was a delay on regional activity on Goal 3, in turn dependent on national activities being completed.[6] The underspend resulted in a carry over for 2017.

The underspend of almost 15 percent in 2017 (32 percent cumulative underspend over the two years) had three main explanations. First, national projects were designed with multi-year funding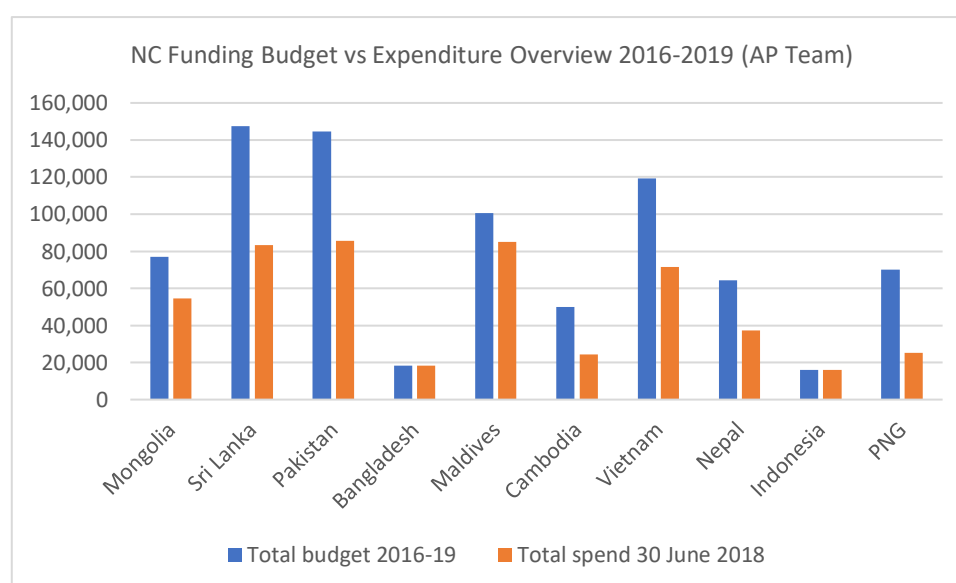 cycles in mind, so that expenditure might flow across years, meaning that exact budget allocations per year were to some extent theoretical. Secondly, two chapters (Papua New Guinea and Vietnam) encountered challenges in their planned projects and had to review and relaunch these. A third chapter, Sri Lanka was able to access funding from another donor to cover budget for 2017, and requested a carry over into 2018. Finally, staff changes at the TI-S had a direct and indirect effect on the programme team, resulting in a staffing gap early in the year. Therefore, a carry over for 2018 was requested.[7]

For 2018, after the first two quarters, there is a 42 percent resource utilization, which overall is taken to mean that the programme is progressing steadily, more or less according to plan.

The spend relative to budget per country is illustrated in the graph below. Considering the first year of the AP Programme saw a slow start partly due to governance changes at TI-S, the spend for most countries have caught up and are tracking well, with 1.5 year of the programme remaining. The perfect on budget expenditure for Bangladesh and Indonesia is explained by these two countries engaged in discrete annual projects, with carefully planned resources for a very distinct purpose.

NC Funding Budget vs Expenditure Overview 2016-2019 (AP Team)

■ Total budget 2016-19   ■ Total spend 30 June 2018

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[6] TIAP Programme of work 2017

[7] TIAP Programme of work 2018

4 FINDINGS – CURRENT ASIA PACIFIC PROGRAMME

4.1 Relevance

> ➢ *To what extent does the programme suit the priorities of the target groups, TI and the donor?*

Guiding evaluation questions:
How was the programme designed and who was involved in and participated in its design?
Have the programme priorities been in line with NCs' as well as TI's strategic priorities?
Are the initial objectives of the programme still appropriate to the priorities and policies of the NCs, TI-S and the donor?
To what extent was the programme gender responsive?

4.1.1 Strategic Alignment and relevance to DFAT and TI-S

The AP Programme was relevant to TI-S and DFAT in its original design, and therefore funding was approved by DFAT in late 2015. This evaluation concludes that because the Programme's four change goals are still intact, and because TI-S' and DFAT's key strategic directions are largely the same, the programme is still relevant for TI-S and DFAT.

For **TI-S**, the AP Programme is strongly aligned with Transparency International's Strategy 2020. This strategy has three strategic priorities:

- *People and Partners* – enabling and facilitating a culture of anti-corruption action, with support to individuals and groups to act to demand accountability in a sustained and systematic way.
- *Prevention Enforcement and Justice* – strengthening of weak laws to bolster corruption prevention systems.
- *Strong movement* – drawing more on TI's global reach, grow influence and innovate the work. TI will also lead by example its work and to be present as a force for anti-corruption where it matters the most.[8]

Of these three strategic priorities, in particular the first two align perfectly with the AP Programme's goal 1, 2 and 3 – Enhanced social accountability, Strengthened anti-corruption legislation, and Strengthened anti-corruption organisations and enforcement of anti-corruption systems. The third priority is primarily aligned with the 'Enabling Impact' component of the programme.

Two internal TI documents have since the initiation of this evaluation been released. These are *Mid-term Review of Transparency International's Movement Strategy 2020*, and *Enhancing Transparency International's Global Advocacy*. The *Strategy 2020* review confirms that the goals outlined in the strategy are increasingly relevant, but notes implementation and operational aspects.[9] Both documents recommend the TI movement to focus on the strategic priorities dirty money/grand corruption and political integrity. To remain relevant to TI, the AP Programme needs to consider how it can focus and better align with these priorities. For both enforcement and Anti-Corruption Agency Strengthening work, and for Business Integrity, there are strong alignments and vertical integrations to be made with the global agenda, *if* the AP Programme pursues these goals strategically.

As a donor, for **DFAT**, there is still strong alignment with the Australian Government's Aid Policy, with 'Effective Governance' being the largest priority area within this policy[10]. Australia provides aid for anti-corruption initiatives as it considers corruption to lie at the heart of many of the governance and broader develop-

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[8] Transparency International Strategy 2020

[9] Further comments on these are found in the effectiveness and efficiency sections of this report, 4.2 and 4.3.

[10] Under this priority, the Australian government has committed to several anti-corruption and justice goals, including fighting corruption. The other goals are: building effective law and justice systems; strengthening policing; increasing the safety and security of communities; improving people's access to justice; and addressing violence against women.

ment challenges in its region: corruption "inhibit[s] economic growth by increasing the costs and risks of doing business. By undermining efforts to raise and spend public finances effectively, corruption also reduces access to quality public services and weakens the rule of law, thus reducing the capacity of countries to translate economic growth into broad-based economic opportunities and improved human development outcomes."[11] DFAT views its support to TI as contributing to operationalising its governance policy.

The Australian Government's Foreign Policy White Paper 2017 confirms Australia's commitment to support an open global economy, and a rules based order at a global and regional level. The Government's Pacific Step-up, announced in November 2018, strengthens its support to the Pacific and underlines that Papua New Guinea, Solomon Islands, Indonesia, Timor-Leste and Vanuatu are amongst the Government's priority countries. This means that the AP Programme in its intent is aligned with and relevant to Australia's key strategic directions. For the programme to remain relevant to DFAT, it will be important to continue the recent effort to strengthen TI's Pacific presence.

4.1.2 Programme relevance and alignment to National Chapters, regional and country needs

Assessing the regional trends and data from countries that participate in the AP Programme, this evaluation has found that the programme in its initial design and focus is still relevant and well aligned to the priorities of the region and the NCs.

While corruption trends and challenges are different within the AP Programme's sub-regions, TI's unique position of combining national level work and experiences of the chapters, with regional needs and trends sets it apart from other anti-corruption and governance organisations and initiatives. This is valid for all four change goals in the AP Programme. Depending on country and sector, other organisations and actors work in the areas of the AP Programme's four change goals, but TI's ability to connect national, regional and global work means that its contributions to each of these four areas are unique and have potential for strategic impact.

The strength of social norms and small populations with close relationships in the Pacific calls for a slightly different approach to anti-corruption work than in Asia. There is for example a strong need for raising awareness of anti-corruption, accountability, and citizen's rights in the Pacific. In Asia, the Anti-Corruption Agency (ACA) initiative has emerged as a need more than in other regions, one explanation for which is the degree of available ACAs to work and partner with. The approach of the ACA initiative may not be transferable without adjustments to the Pacific, where some countries are yet to set up or resource their ACAs. In the Pacific, development and strengthening of legislative frameworks is highly relevant and foreign influences make it imperative to speed up strengthening of a rules based order.

While shrinking civic space is a global trend, it manifests differently in each country context. In many parts of Asia, rising authoritarianism has politicised anti-corruption initiatives. However difficult, this means there is an even stronger need for a solid anti-corruption movement and a civil society voice, while still finding mechanisms to protect individuals and organisations. The response needs to be sensitive to its specific emergence and dynamics. Recommendations to protect and expand civic space include mobilising citizens, collaborating through diverse alliances, media literacy, fact-checking, and civic education[12].

In assessing relevance and alignment of the AP Programme to the **National Chapters** strategies and programmes, it is important to look at the aspect of awareness. Relevance requires awareness of what is at stake and to this effect a survey asked the NCs about their awareness of the four overarching goals for the Asia Pacific Programme. The answer is an indication of deliberate alignment (or not) to the strategic priorities of the programme, as well as conditions for sustainability of results. A large majority, 86 percent, stated that they were either fully or largely aware of the four programme goals. Furthermore, 87 percent of the chapters stated that the objectives and priorities of the NC are for the most part or fully compatible and aligned with the four programme goals. The overwhelming majority of NCs consulted through interviews confirmed that they had had no issues linking the goals, and that pairing the activities with those of the AP Programme was not burdensome, it was 'logic'.

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[11] Australia's approach to governance is set out in *Effective Governance: Strategy for Australia's aid investments*.

[12] Divjak, T & Forbici, G (2018). *The future evolution of civil society EU by 2030.* EESC

> *"We have our own strategy, based on the country's needs. We then looked at what TI-S had by way of strategy, it was a natural fit. Lots of alignment and links. Even though we didn't adopt 100 percent of the strategy, they still very much align."*

One chapter noted that one activity was created specifically fit with goal 1, and that this was considered positive upon the realisation that this was something that the country needed. Another chapter has commented in the survey that:

> *"Compatibility is due to robustness of the NC programme more than a deliberate effort of synergy either by TI-S or by NC"*

This could be interpreted as a confirmation of the universality of the goal, and its relevance at NC level, regional level, and at global level, as illustrated by the *Strategy 2020*. The 'logic' and alignment referred to further above appears to stem from goal areas that capture a relevance that is transferable and applicable to most countries involved in the AP Programme. This in turn confirms a well-considered and well-designed programme and goal areas.

To ascertain whether the initial objectives of the programme are still appropriate to the priorities of the NCs and the country needs, 90 percent (9 respondents) answered either that TI does relevant and optimal projects in their countries, or that generally it does, but that it needs to re-orient aspects of it. As a follow-up question, 90 percent of the partner and stakeholder also answered that the objectives and priorities of their organisations are fully or for the most part compatible and aligned with those of TI in their country. This is likely to mean that the NCs' and their partners and stakeholders share the same view on the most pressing corruption concerns, as a result their partnerships are logical and has the potential to be effective.

At the country level, some NCs have had to change focus of the AP Programme, usually due to changes in the political environment, including a shrinking space for civil society. One example is the TI's national contact Towards Transparency (TT) Vietnam, which had to alter the initial plan due to changes in the operating environment. It therefore changed its focus from outsourcing the ALAC to a partner, to strengthening the anti-corruption legislation, including by involving the private sector and civil society organisations in the revision of the law text.

In assessing the relevance of Goal 1 – Enhanced Social Accountability – it is worth noting the 2017 Global Corruption Barometer for the Asia Pacific region, in which people across the region thought that reporting corruption (22 percent) followed by refusing to pay bribes (21 percent) were most effective ways to tackle corruption. Simultaneously, however, the regional survey concluded that few people reported corruption as they are afraid of consequences, with 26 percent noting claiming that they had suffered negative repercussions upon reporting.[13] People must be encouraged and empowered to report and speak up against corruption, while being safe to do so, hence why social accountability and protection of reporting persons is critical.

At the country level, the relevance of social accountability was confirmed by a broad range of stakeholders. For example, in Papua New Guinea, training for local level representatives and community leaders is considered by authorities to complement training conducted by the Department of Provincial and Local Government Affairs, and there is a request for TI Papua New Guinea and partners to do the training in other parts of the country. The government has stopped raising awareness around Constituency Development Funds and people's rights to public services, and this role has fallen on the civil society. In Cambodia, where the civil society sector is under pressure, and there is increased mistrust towards the central authority, the role of the Advocacy and Legal Advice Centre (ALAC) is ever more important, without which people may find it hard to seek free legal advice.

In sum, the relevance of Goal 1 at both regional and national level is very high, and this is valid for the Asia region, as well as the Pacific.

For Goal 2 – Strengthening of Anti-Corruption Legislation – while strong progress has been made in previous programme periods under this theme, as concluded by some NC representatives, there is still work to be done. Several chapters are running a successful legislation programme, and there is generally a consensus that TI is the only civic actor participating in the drafting process, or, if working with other CSO partners, the only party

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[13] Transparency International (2018). *People and Corruption: Asia Pacific. Global Corruption Barometer 2017.*

with technical anti-corruption expertise. Such is the case in Vietnam, where TT Vietnam is the only civil society organisation providing technical support to the legislative anti-corruption work, thanks to the DFAT grant. It contributes to the strengthening of the current anti-corruption legislation, which is currently going through a revision process. In the Pacific there is a strong need to develop and strengthen anti-corruption legislation. However, the overall scope of this change goal in a new programme could be assessed, to allow for a smaller and more targeted Anti-Corruption legislation initiative where it is most urgently needed.

In terms of <u>Goal 3 – Strengthened enforcement of anti-corruption mechanism</u> - in several of the participating countries there are good legislative frameworks in place, or in good progress, but there is poor enforcement and weak capacities of the ACAs. TI's Global Corruption Barometer 2017 noted that around 50 percent of people in the Asia Pacific region considered that their governments were doing a bad job at fighting corruption. Of those in the region who had reported a bribery incident to the authorities, less than 23 percent had seen the authorities taking action as a result.[14] As ACA are critical in ensuring that the citizens, public institutions and business adhere to non-corrupt behaviours and practices, an unwilling and uncooperative ACA makes progress on other goal areas challenging, such as citizen's not receiving redress for their corruption cases. The transparency, accountability and integrity of ACAs are indispensable to improve public trust in the system. Strengthening the enforcement of institutional mechanisms to combat corruption is therefore highly relevant, at both regional and national levels. While other actors, such as UNDP, work with ACA government capacity building as well, TI's value add is providing an independent (civil society) assessment, something which can be more challenging for multilateral organisations whom need to maintain good relationships with governments and as such cannot fulfil the same watchdog role as TI can.

For <u>Goal 4 – Demonstrated business integrity</u> - in many Asia Pacific countries, most corruption cases come from the private sector. In the largest and most recent study of its sort, if a bit dated now, Ernst and Young's 12th Global Fraud Survey of 1,758 senior executives in a sample of the largest companies in 43 countries found that bribery and corruption were widespread, with 39 percent of the respondents reporting that bribery or corrupt practices had occurred frequently in their countries.[15] Among the 26 Asia Pacific countries included in Transparency International's Global Corruption Barometer 2013, the business or private sector was the most corrupt institution in Fiji only with a score of 3.6.[16] Another initiative, the 'Regional Integrity Pledge' (a voluntary commitment to Ethical Business Practices in the ASEAN), notes as its *raison-d'etre* the evident need to strengthen regional alignment and cooperation in order to achieve scale and enhance the effectiveness of anti-corruption and integrity programmes in the ASEAN region.[17] Finally, in a recent study, the ASEAN CSR network found that although the top ASEAN listed companies across five countries[18] had improved in corporate disclosure of anti-corruption practices, there is remaining concerns over a lack of safeguards and practices regarding external relationships with agents and suppliers dealing with the organisations.

Even though it is a small intervention area, and piecemeal at national level, several evaluation participants considered it essential to keep as part of the AP Programme, since it is highly relevant and important to the countries in the region, as discussed above. However, despite the relevance of this goal to the needs of the region and the country, there is currently variability in the uptake of this area in the NCs' strategies and country programmes. Alignment at regional level is high, while alignment to the NCs strategies and programmes is average. The lower degree of alignment is likely to be due to a combination of insufficient capacity at NCs to take on a new area and uncertainty in how to initiate a project in Business Integrity, although two chapters out of four visited indicated that they wanted to get more involved in this area going forward. To remain relevant and focused, TI needs to make a strategic decision whether to continue with this goal. If continuing, the attempt should be to align with the TI movement's strategic priorities and advocacy goals and contribute to bringing national issues together to create regional and ultimately global pictures on business integrity challenges and responses, as pointed out in the Mid-term review of the Strategy 2020

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[14] Ibid.

[15] Bribery was prevalent in the business sector according to 72 per cent of the Indonesian respondents. 54 percent of the Indian respondents indicated their willingness to use entertainment to win or retain business.

[16] Jon S.T. Quah (2017). *Anti-Corruption Agencies in Asia Pacific Countries: An Evaluation of their Performance and Challenges.*

[17] The Integrity Pledge mission statement, 2017

[18] Indonesia, Malaysia, Philippines, Singapore and Thailand

Gender inclusive programme design

In the evaluation survey, NCs were asked whether perspectives related to gender and vulnerable groups had been sufficiently addressed in the design and planning of the activities. Over half, 53 percent, answered that they were considered throughout the design and planning phase or that the perspectives were considered to a large degree, and 27 percent that the perspectives were considered to some extent. This is in line with the findings from key informant interviews, which showed that half of the chapters appeared to be relatively gender aware and stated that gender aspects were a factor in planning activities. The other half, however, appeared to be relatively oblivious to the need and relevance of addressing gender at the planning and design stage, if at all. Reviews of NCs quarterly reports confirms this variability.

Participation in programme design

A strong participatory element in programme design is essential for relevance, and in turn for ownership and sustainability. All in all, there has been a very strong participatory element involving TI-S and NCs in the design and planning of the current AP Programme. However, the degree to which this extended to the NC level appears to vary.

The participatory element by NCs in the process of identifying programme areas for the 2016-19 programme was initiated a year before the previous programme period ended. To confirm the programme, iterative meetings were held between TI-S and regional Executive Directors, and with regional Board Chairs. Once the programme structure and areas were set, the NCs could choose what goals to align their programme and activities with.

According to the TI model, NCs in turn develop their strategies based on national consultations. The degree of participation appears to overall be good, although sufficiently robust data cannot confirm this. The staff at one chapter stated that it was not involved in the planning for the AP Programme in 2015, but that the planning overall at this chapter is more participatory now, which increases the relevance of the programme. In a survey to stakeholders, 90 percent (9 respondents) stated that their organisations had contributed to the NC in their respective country's process of setting objectives and priorities for the programme. In a follow-up question, 40 percent responded that they had joint planning sessions where joint objectives and priorities were established, 30 percent stated that the were consulted several times during the TI NC's planning and design process. All in all, this indicates a relatively strong participation by chapters and partners in the national level planning of the AP Programme.

4.2 Effectiveness

> *How far were the intended outcomes achieved in relation to the targets set in the original grant proposal and in the national plans?*

Guiding evaluation questions:
What main factors have played a role in the achievement or non-achievement of the programme goals and objectives?
Who has been reached by TI's work and what has been the effect on gender and vulnerable groups?
Can the achievements be linked to TI-S and chapter work?
How effective was the support of TI-S in terms of enabling NCs to achieve the objectives?
Going forward, what can be done differently to offer a more inclusive and gender responsive programme?

4.2.1 Goal 1: Enhanced Social Accountability and Role of Civil Society

Intermediate outcomes:
- *Citizens will be supported to voice their corruption complaints and seek redress for their grievances.*
- *Space for civil society in legislation, policy and practice will be preserved, and mechanisms to protect civil society activists will be strengthened.*

Enhanced Social Accountability is, together with Goal 3 on Strengthening Anti-Corruption Agencies, the AP Programme's biggest budget area. In terms of the spread and diversification of interventions and activities, it is by far the most comprehensive goal. It covers activities implemented by the NCs, as well as regional level advocacy work.

The table below illustrates the progress towards the updated targets for the intermediate outcomes for Goal 1, and is sourced from the AP Programme's Annual Reports and NCs' quarterly reports. In terms of 'description of instances' mentioned in the table, these are reported quarterly by NCs to TI-S as narrative results statements. As at 30 June 2018, the following quantitative progress had been made[19]:

	Indicator	Baseline 2015	Updated target 2019	Progress 2016	Progress by 2017	Progress by 30/06/18
Enhanced Social Accountability	Number and description of instances where individuals or communities hold leaders and institutions accountable	2	**91**	16	33	**44**
	Number and description of instances where TI advocates for greater civil society space	3	**66**	5	14	**18**
	Number and description of instances of outreach and awareness raising activities organised, with attendance broken down by gender	8	**66**	61	318	**390**
	Number and description of instances where social accountability tools are used at national and local levels	13	**48**	7	23	**34**
	Per cent of corruption related complaints submitted to the Chapters that have been resolved to the clients' satisfaction, with clients broken down by gender	75%	**72.5%, 40% female complaints**	62%, 55% female		[not sufficient data]

While it has not been possible to validate the numbers presented in the table by other independent means within the scope of this evaluation, looking at the targets reached across this goal, it is fair to assume that citizens have been "supported to voice their corruption complaints and seek redress for their grievances", which is one of two intermediate targets for this goal. The opportunity for people to hold leaders and institutions accountable has apparently been raised, there are a very high number of awareness raising activities completed, and the opportunities for people to participate in structured social accountability activities have increased. In several participating countries, notably Sri Lanka, Cambodia, Nepal, Pakistan, and Maldives, there has been extremely good progress towards the targets, as well as indications of change in behaviours and voices raised. While there was generally lower progress in 2016, due to the slow start of

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[19] Sources: AP Programme Annual Report 2017; Q8 National Chapter reports.

initiating the programme in most countries, what stands out is the high progress at the end of 2017 for number of outreach and awareness raising activities organised.

This evaluation has observed and analysed the following qualitative examples of the 'descriptors' mentioned in the table, to complement the numerical progress towards the targets:

- In **Sri Lanka**, a very large number of activities and campaigns were organised 2016-2018. This was supported by the regional ALAC offices and RTI hubs, and mobile ALAC clinics. The ALAC has improved social accountability by helping to gather evidence about the extent to which land issues are a general public concern, and since 2018 it is more focused on advocacy and consolidated claims. TI Sri Lanka has been able to connect social accountability with goal 2, Strengthening anti-corruption legislation, by bringing consolidated claims to the government to point out that a particular issue, such as land, is not within the legal boundaries.
- TI **Nepal** has established a partnership with 25 Affiliated Organisations, resulting in ALAC coverage in six of Nepal's most remote and neglected districts, an effective forum for people to raise complaints about public services, where information from the mobile ALACs are presented to the concerned local government for case resolution. According to TI Nepal, public servants were previously perceived not to listen to the public's complaints, but this has changed, with mechanism in place to hold the local government accountable, and a high number of reported cases have been resolved.
- In **Cambodia**, a large number of outreach activities were implemented, with TI Cambodia extending its reach by placing complaints boxes at the offices of partners. Building pressure is mainly done at the local level by referring cases to authorities and by either showing solidarity with other NGOs or via legislative input. TI Cambodia can draw on an extensive loyal youth network which it involves in the outreach activities. The ALAC has received a high number of complaints, suggesting a high degree of success in raising awareness. However, poor enforcement of the Anti-Corruption Law remains a challenge for the success of ALAC in terms of solution of cases.[20]

TT **Vietnam** encountered challenges and its ALAC component could not proceed as planned. Due to challenges in the working model required by Vietnamese regulations as to which type of organisations can provide legal advice, and following organisational changes and challenges at TT Vietnam in terms of changes in resources, the project between TT Vietnam and the partner hosting the ALAC was terminated. Instead, TT Vietnam created an innovative legislative project. Refer to the section 4.2.2 on Goal 2 for more on this.

TI **Papua New Guinea** took some time to get the ALAC under the current AP Programme started. Due to turn-over on the ALAC lawyer position, and due to the workings of the country's ACA has not been conducive, a lower number of cases than the target have been resolved and this discourages people to report corruption. A complaints box was placed in the Lands Department, as the ALAC had focused previous advocacy on land issues, but this has been removed by the Department. The ALAC has instead primarily consisted of some awareness raising activities, primarily in Port Moresby.

While the above examples testify to the breath of activities implemented, as well as to some degree of behaviour change in terms of the increasing number of people seeking redress, there is not sufficient data from the direct <u>beneficiaries</u> of TI's interventions for social accountability. Such data would be relevant in order to understand beneficiaries' experience with TI's and its partners' advocacy and outreach activities, the degree of change in behaviours amongst the public and civil society groups, and to what extent this can be attributed to the work of TI regionally, and in-country. TI collects 'Real lives, real stories' from the NCs, stories with a clear citizen's view and how efforts by NCs and ALACs have impacted on their lives. However, it is important that this type of evidence be independently collected as well, and with both breadth and depth in mind, and thematically evaluated across this programme goal. Without this evidence, any assessment of results and effect will always remain a proxy for primary data on impact at beneficiary level.

Similarly, in terms of gender and vulnerable groups, limited beneficiary data hinders proper assessment of <u>effect</u> on vulnerable groups and gender. However, there are several examples from the AP Programme in terms of <u>reach</u>. There is evidence from this evaluation's field trips, and TI internal documentation, to conclude that reach had generally improved in the first two years of the current programme. Better reach is attributed

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[20] The National Assembly's Commission #10 on anti-corruption has not worked well after the opposition party dissolved and its parliament seats were taken in the past year. This factor is the biggest challenge to this work.

to programming solutions, such as good partnerships with other CSOs to deliver services, mobile ALACs, leveraging off other chapter activities in provinces to provide ALAC helpdesks, and use of mobile technology. Some examples of reach are listed below:

- In Sri Lanka, access to and reach of the ALAC has been enhanced through advertising in press of different languages. In districts where there is no ALAC office, the RTI hubs operate through partner organisations. Vulnerable communities in the north, affected by absence of promised reconstruction schemes in the wake of the civil war, can use the RTI service as a mechanism to complain and question on failure of service delivery. In addition, civic mobilisation meetings in five districts for people to file using RTI have been implemented.
- TI Cambodia uses other partners and a wide network of youth activists (a support base that was partly developed in the previous AP Programme) to champion the ALAC work. It has five regional offices, and has conducted a number of ALAC outreach activities in 12 provinces, and 18 ALAC boxes have been placed in provinces , 10 Training of Trainers on ALAC to local NGOs in order to increase these to 14 out the country's 24 provinces. In addition, thanks to an online complaint mechanism, people can access the ALAC services from their smart phones, with potential to increase access.
- Both TI Maldives and TI Pakistan expanded their reach through mobile ALACs. This was also the case for Pakistan and Nepal. Thanks to this mechanism for improved outreach, TI Pakistan, in partnership with local CSOs, have held anti-corruption rallies, following which two arrests were made on corruption charges.[21]
- TI Nepal focus on six districts that are not getting resources, funding, projects or attention from other donors.

In Papua New Guinea, some evaluation participants considered it important that, once the ALAC is up and running, it aims for a wider engagement outside Port Moresby for better effect and impact, and that it is necessary to establish more partnerships to have this reach.

Regarding gender aspects on reach, there is also evidence from quarterly reports, NC strategies and interviews that NCs are more aware of gender concerns in delivering their projects and activities, and that some NCs are actively and innovatively integrating consideration of gender into the delivery mode of their projects. TI Sri Lanka noted for example that women represent the overwhelming majority of people who visit their mobile ALAC clinics. For TI Nepal, a gender approach is effectively used as a strategy for better outreach and impact: at local level, the ALAC always asks the local partner organisation to include women, as the experience is that women tend to share information they receive with other families (whereas men tend to keep the information to themselves). In Cambodia, when TI goes to the provinces and districts, mainly women come to meetings, whereas people who come to the ALAC offices are mainly men. The ALAC and its NGO partner have also tried to organise the events in the centre of the city or province or near a school, in order for women and students to be able to attend the events and return home in safely.

In terms of the intermediate outcome preserving space for civil society in legislation, policy and practice, and strengthening of mechanisms to protect civil society activists, the target set for the end of the programme is 66, while as at 30 June 2018 only 18 such actions have been reported. If only narrowly analysing targets reached, it does not appear to be on track. However, this is a challenging area to plan for and estimate realistic and tangible goal. It is a demand-driven intervention area, critically important, but an attempt to structure it as if it was within the full control of TI will fail.

Within those 18 instances reported, TI-S has responded to threats against civil society and to the NCs work and staff with tailored responses and support. TI chapters in Bangladesh, Cambodia, Maldives, Pakistan, Papua New Guinea and Sri Lanka faced different security threats and TI-S supported these chapters through constant contact with different teams at TI-S, the TI Board, other NGOs and stakeholders, to deploy appropriate rapid responses. In addition, TI chapters in the Maldives, Cambodia and Mongolia have proactively worked to protect civil society space through engaging with their governments on regulatory framework for NGOs.

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[21] Transparency International (2018). *Transparency International's Asia Pacific Programme. 2017 Annual Report*.

Analysis of achievements and the role of TI-S

Achievements of the programme objectives, targets and some intermediate outcomes are attributed to a combination of chapter capability and capacity, support from TI-S, effective partnerships, and a conducive political environment. Conversely, lack of achievements can be attributed to some of these factors as well.

TI-S has provided different types of support and tools to facilitate programme progress towards of Goal 1. One such effort was a mapping of social accountability activities, done in 2017. The mapping outlines the different activities at the local, sub-national and national levels, reflecting a vertical integration model of accountability which shows that the impact of local accountability initiatives remains local and is only scaled-up when monitoring government performance is coupled with building pressures for change at all three levels. The mapping is helpful both in terms of analysing summatively how successful chapters have been at social accountability, as well as it is a tool for chapters in terms of understanding gaps in activities at different levels and adjusting their programmes accordingly.

Using the mapping summatively to assess social accountability work, the document concluded that the chapters which combined creating spaces for engagement and building pressure for change are Nepal, Pakistan and Sri Lanka.[22] In Nepal, the high rate of resolving individual grievances is likely due to TI Nepal's/Affiliated Organisations' approach to coupling awareness raising and legal advice with state-citizen engagement contributes. It appears to result in increased responsiveness by government authorities. An additional factor contributing to this positive outcome is a conducive local government environment. In addition, TI Nepal received extensive support from TI-S in design and strategy as part of the Enabling Impact component. In Sri Lanka, funding from AP Programme under Enabling Impact enabled the extensive RTI work, which has contributed to the high number of outreach activities in the country: TI Sri Lanka had a large Enabling Impact component of its total AP Programme budget, a large part of which was dedicated to develop the RTI concept and deployment. In addition to a capable local team, for the past few years, there has been a relatively conducive environment with a cooperative ACA, resulting in reported cases being processed.

According to the social accountability mapping, TI Papua New Guinea's focus is very biased towards building pressure at the national level (legislative input, advocacy and collective action) and that more needs to be done to create impact. It suggests that this bias (i.e. building pressure) needs to be adjusted by adopting a more balanced approach that includes awareness, evidence-based research and opening spaces for citizen-state engagement at all levels. However, this assessment needs to be viewed partly in the context of the past two years staffing issues at TI Papua New Guinea. For 2019, the ALAC plan is to leverage off the local level government training (refer to section 4.1, relevance), and offer an ALAC helpdesk, in conjunction with the training, an excellent example of cost efficient programming with potential for outreach.

According to TI Cambodia, TI-S has been instrumental in first enabling the ALAC to be started, and second for consistently supporting and facilitating access to tools and peers. In terms of progress towards creating true social accountability, the shrinking civil society space and non-cooperating ACA makes case resolution challenging. [23]

Lack of progress, or a forced change in programme direction, can in several places be attributed to a shrinking space for civil society. When this is the case, TI-S has been helpful in guiding chapters in alternative approaches, but it can do more of this. As the Mid-term evaluation of the Strategy 2020 notes, where the space for debates is more limited, or where the civil society is not coordinated or strong, support or capacity building for specific audiences can be prudent first steps, but that chapters can benefit from guidance from TI-S regarding which approach to choose in such circumstances.

For gender, TI-S has had continued conversations at meetings with many chapters on how to better address this perspective. A webinar on gender and social accountability was held in 2018 and there are sometimes very helpful communications and feedback that takes place in the context of the quarterly reports, where chapters sometimes get triggering questions and advice on how to go about thinking on, primarily, gender representation in terms of numbers. As mentioned above, TI Nepal is a very good example in this case.

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[22] Transparency International (2017). *Mapping of Social Accountability Activities: Asia Pacific Programme.*
[23] Ibid.

4.2.2 Goal 2: Strengthened Anti-Corruption Legislation

Intermediate outcomes:
- ***New anti-corruption legislation tabled and passed***
- ***Improvement of weak existing anti-corruption legislation***

For the work on corruption to be successful, legislative frameworks need to be in place. Across the targets sought in the legislative area, there is great success and achievement. Sourced from TI Annual Reports and NCs' quarterly reports, the following quantitative progress had been made as at 30 June 2018 towards the updated targets for the intermediate outcomes under this goal[24]:

	Indicator	Baseline 2015	Updated target 2019	Progress 2016	Progress by 2017	Progress by 30/06/18
Strengthened Anti-Corruption Legislation	Number and description of instances where recommended anti-corruption standards and policies are <u>adopted</u> by targets	4	30	8	21	**23**
	Number and description of instances where recommended anti-corruption standards and policies are <u>enforced</u> by targets	0	14	6	10	**38**
	Number and description of instances where public consultations on legislative items were organised and led to recommendations submitted	7	13	8	11	**13**

Noteworthy is the fact that although 2016 was considered a start-up year and NCs were getting ready internally for the outreach activities, this goal area overall still made substantive progress towards the intended targets. The highlights in terms of qualitative descriptors encompass most of the NCs that contribute to this goal and with funding from the AP Programme, are listed below.

Sri Lanka[25]:
- TI Sri Lanka was in 2016 invited to contribute to the drafting process of the RTI law and made significant contributions.
- The National Audit Bill, passed in 2018, is the key pillars of the current President's mandate, and with TI Sri Lanka widely appreciated for its contribution on many fronts, including extensive consultation process. Its press release regarding the bill was on the front pages of the biggest newspapers.
- For the Proceeds of Crime Bill, TISL had to be the voice of civil society in a policy formulation context (which means connecting to Goal 1, Social Accountability). By virtue of being at the drafting table, TI Sri Lanka got most of its recommendations through.
- For the Victims Protection Act, TI Sri Lanka produced a small brochure to inform citizens about the contents of the Act and the rights to services they have. The Witness and Protection Authority is now using this material for training of local representatives.

Cambodia[26]:
- TI Cambodia was on the expert group on two key laws in progress: Law on the Protection of Reporting Person, and Law on the Protection of Witness, Expert and Victims, which together form the whistle blower protection legislative framework (still in draft). According to evaluation participants, the fact that TI Cambodia was on the expert group made a significant difference to the quality of the laws, as the only external organisation with an expert role.
- For the Right to Information, TI Cambodia contributed in a coalition with other CSOs, the draft law is also considered of high quality.

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[24] Sources: AP Programme Annual Report 2017; Q8 National Chapter reports.
[25] Based on interviews with TISL, partners and stakeholders in field, and quarterly reports.
[26] Based on interviews with TI Cambodia, partners and stakeholders in field.

Vietnam[27]:

- To advocate the Anti- corruption law of Vietnam to meet international standard, TT Vietnam engaged an international legal expert from Harvard Law School who provided analysis and recommendations to law drafters. It also provided comments on the anti-corruption law drafts in partnership with civil society and the business community. It created opportunity and space for the law drafters to hear input, and was thus able to strategically integrate aspects of goal 1 and 4 into the legislative context.

Pakistan:[28]

- Whistleblower protection legislation passed in 2017, following advocacy work by TI Pakistan.
- Lobbying for strengthened RTI legislation at state level resulted in amended RTI Law enacted at Sindh Province.

Papua New Guinea:

- TI Papua New Guinea has been advocating for the establishment of an Independent Commission Against Corruption (ICAC), as a result the Attorney General officially requested TI PNG to input to the draft ICAC legislation. The legislation is yet to be brought to Parliament. While the targets for this work has not be reached, a key informant considered that TI Papua New Guniea has helped fight off reversals of its anti-corruption law.

Maldives:

- TI Maldives made headway in 2016/17 on the drafting of the Whistleblower law and a secured agreement with an MP to submit this to Parliament. In late 2017 and in 2018, however, the organisation faced difficulties, with no work on strengthening anti-corruption legislations being able to be carried out due to an extended standoff between the Parliament and the Government.
- Despite challenges, TI Maldives continued the work on enforcement and strengthening of existing laws, such as Associations Act.

At regional level, TI-S facilitated coordination and collaboration across the Asia Pacific chapters on how to best engage citizens, government and other stakeholders on Right to Information laws, their implementation and enforcement. As a result of this consultation, the AP Team conducted an initial mapping of RTI legislation in the Asia Pacific region, to identify and assess information already in the public domain. This resulted in the report *Right to Information in Asia Pacific* in 2018, and will be used to inform further advocacy in the region, and allow for a regional approach to supporting the progress of chapters on their RTI work.[29]

Analysis of achievements and the role of TI-S

In key informant interviews, Cambodia, Sri Lanka and Vietnam express strong satisfaction and gratitude towards TI-S, and DFAT, for continuing to fund and support this change goal. The combination of access to funds for a very specific and technical area, and the access to tools and expertise at TI-S has essentially enabled the progress on strengthened anti-corruption legislation in the three mentioned countries. Some chapters working with Whistleblower bills have been able to pass drafts to other chapters and to technical expertise at TI-S, who work on other Whistleblower projects. There are TI-S staff who focus on RTI as well, without being part of a specific team or project, and chapters have been able to consult these, as well as other chapters for peer-to-peer learning. TI-S considers it difficult to have a regional approach for the legislative area, as the needs a very country-specific.

The high number of successful legislative work in Sri Lanka is in addition likely due to a current favourable political climate, where there has been an interest in progressing anti-corruption legislation, as well as strong competency at the NC in the country (after initial staffing issues on the lawyer position in 2016, and the beginning of 2017). In Cambodia, the situation is the opposite, where it is difficult to progress the legislative agenda due to relationship constraints with the country's Anti-Corruption Unit. Finally, in Vietnam, thanks to flexibility and technical support from TI-S AP Team, despite shrinking space for civil society, the NC has been able to re-design and reallocate funding from what was initially an ALAC project to a multi-stakeholder legislative partnership that has been very successful.

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[27] Interviews with TI-S staff, TT Vietnam, Quarterly Reports.

[28] Transparency International (2017). *Mapping of Social Accountability Activities: Asia Pacific Programme.*

[29] Ibid.

4.2.3 Goal 3: Strengthened Enforcement of Anti-Corruption Mechanism

Intermediate outcomes:
- *Relevant public institutions are supported to be more transparent and accountable*
- *Anti-corruption agencies are strengthened to be more effective*
- *Improved public service delivery is supported*

A change from the previous AP Programme is that stronger emphasis has been placed on enforcement, which is also one of the strategic priorities in Transparency International Strategy 2020. This goal is therefore new in the current programme, and the results achieved should be viewed in this context.

The change goal is implemented both at regional and national levels, with overall objective to improve the effectiveness of ACAs, leading to reduced levels of corruption in the Asia Pacific region. One strategy to achieve this is to support ACAs to improve their effectiveness and performance, through partnership building, dialogue and evidence-based advocacy though the inclusion of a range of relevant stakeholders.[30] The regional ACA Strengthening Initiative is being managed from TI-S, in partnership with the NC in Bangladesh. Assessments, outreach and advocacy are implemented by TI's partners, contacts or accredited chapters in-country, in collaboration with ACAs. In some cases, ACAs have committed a portion of their own budget to fund the initiative.

The pilot assessment of the initiative took place in Bhutan in mid-2015. NCs in Bangladesh, Indonesia, the Maldives, Mongolia, Sri Lanka, Pakistan and Taiwan carried out assessments of their respective ACAs between 2015 and 2017.[31] The assessments consisted of seven key criteria that influence the ACAs work, underpinned by 50 indicators. Each indicator is scored and the results aggregate to show how strong an ACA performs in its enabling context.[32] The quantitative progress towards the set targets for this goal are listed below.[33]

	Indicator	Baseline 2015	Updated target 2019	Progress 2016	Progress by 2017	Progress by 30/06/18
Strengthened Enforcement of Anti-Corruption Mechanism	Number and descriptions of instances where recommendations to address issues related to weak enforcement of anti-corruption mechanisms are taken up by targets	0	**20**	12	24	**29**
	Number of instances of anti-corruption institutions engaged with Chapters based on recommendations proposed by Chapters	0	**25**	3	40	**62**
	Number and description of instances of advocacy actions promoting strengthening enforcement of anti-corruption mechanisms nationally and regionally in Asia Pacific	5	**7**	2	22	**32**

Whether there is actually steady progress towards intermediate outcomes in the ACA strengthening initiative is too early to determine, and most likely there is a need to allow for more time and ground work for results and effects to be visible. The behavioural change process is long, even though through a staggered approach it should be possible to establish whether the progress is on the right track. While the regional follow-up assessment scheduled for 2019 should provide some insights into what has changed at the ACA level in the

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[30] There are four unfavourable aspects of the policy contexts that might hinder the effectiveness of the ACAs in Asia Pacific countries. First, Afghanistan, Myanmar, Pakistan, Philippines and Thailand have, to one extent or another, been embroiled in internal political and military conflict for many years, while Cambodia, Nepal, Sri Lanka, Timor-Leste and Vietnam are post-conflict countries that have endured protracted periods of civil war. PNG is perhaps in a third category but is characterised by very weak governance and a difficult internal political system due to its geography, poverty and complex social makeup. These countries are vulnerable to corruption because of the combined effect of the legacy of wartime corruption, the management and distribution of massive inflows of funds from natural resources or foreign aid, and the weakness of the state. (Source: Jon S.T. Quah 2017).

[31] Some Chapters were unable to participate, as participation requires an MoU with respective country's ACA.[31]

[32] Transparency International. *Strengthening Anti-Corruption Agencies in Asia Pacific.*

[33] Sources: AP Programme Annual Report 2017; Q8 National Chapter reports.

participating countries, a shorter term outcome sought is to support ACAs to improve their effectiveness and performance, through partnership building, dialogue and evidence-based advocacy via the inclusion of a range of relevant stakeholders. This aspect is possible to assess within the scope of this evaluation, and there is great progress against the targets, all of them surpassed. Aside from targets attained, positive effects from the first two years of this initiative are, according to TI-S and the 2018 chapter surveys, that:

- All chapters from the first assessment round want to continue with the second round, in addition to some new chapters.
- Access to data from the ACA, and more honest assessment.
- Thanks to the data, better facts based advocacy.
- Through the research and data, the chapters have managed to improve the relationships with their ACA and new opportunities to engage with the ACAs have arisen for chapters.

At country level, the NCs used the assessment as a base for engaging in different activities together with or aimed at their respective ACA. In terms of immediate regional work, and advocacy supported by the AP Team for improved anti-corruption agency effectiveness, TI Bangladesh led the preparation of a regional synthesis report based on the ACA assessments of the five participating countries. The report formed the basis for TI's regional and global advocacy on ACA strengthening. Furthermore, through the initial assessments, the AP Team and TI Bangladesh sought a regional approach to engaging with ACAs. This included regional meetings to share findings and recommendations, and develop a regional advocacy strategy. Using the ACA regional assessment as a base, the AP Team engaged in further regional and global advocacy at the ADB/OECD Anti-Corruption Initiative, and the UNCAC Conference of States Parties at 2017. In 2018 focus has been identifying priorities for the next phase, and preparing for the follow-up assessment in 2019.

Analysis of achievements and the role of TI-S

Due to the organisational changes and staff turnover at TI-S in 2016 and into 2017, the ACA initiative was behind schedule the first year. Since then, one staff member has been dedicated to this goal, which has enabled the AP Programme to catch up and being on track with the planned activities as at 30 June 2018. The role of TI-S in this goal area is clear. It is mainly a regional initiative, coordinated between TI-S and TI Bangladesh, with facilitation of national initiatives. The methodology, facilitation of experience sharing and advocacy would not have been possible without support from TI-S, and TI Bangladesh. The results achieved thus far also indicate an appetite among chapters, and to some extent the ACAs for this initiative. This speaks to the relevance of the strengthening enforcement of anti-corruption mechanism, and that there is a large area to work in and to meet the demand for it.

4.2.4 Goal 4: Demonstrated Business Integrity

Intermediate outcomes:
- ***Improved business regulation is supported***

	Indicator	Baseline 2015	Updated target 2019	Progress 2016	Progress by 2017	Progress by 30/06/18
Demonstrated Business Integrity	Number and descriptions of instances where recommendations to enhance good governance in businesses are taken up by targets	0	4	1	1	**1**
	Number and description of instances of advocacy actions promoting positions on business integrity regionally and nationally	4	8	3	8	**8**
	Number and descriptions of instances of engagements with businesses and private sector umbrella bodies	6	**15**	4	15	**30**

Goal 4 - Demonstrated Business Integrity - is the smallest change goal in terms of resources invested. It is plausible to say that the ambitions for this goal were modest due to it being a new area for the AP Programme, and could be considered a pilot phase for this programme period.

At regional level there are opportunities for a more strategic approach, such as through partnership with ASEAN. In late 2017, TI-S signed a MoU with the ASEAN CSR Network to work on business integrity in the region[34] and are currently considering next steps for a sub-regional strategy. In addition, TI-S and TI's four ASEAN chapters are observers of the ASEAN Business Integrity Working Group, and common priorities, forums for targeted advocacy, and actions have been set for 2018-19.

At national level, however, the goal is piecemeal. Five NCs are implementing activities under this goal and funded by the AP Programme and/or supported to engage in training or other networking activities. Other NCs are expressing interest in working more with the private sector, yet others have activities in this area, but funding from another sources.

The strongest business integrity programme is run by TI Mongolia, which has an established Business Integrity office and has been able to sustain an ambitious private sector programme. The NC has engaged with private and public sector representatives of the Business Ethics Working Group, which was initiated by TI Mongolia in 2015. Its key achievements include:

- Preparing an exemplary Whistleblower Policy;
- Preparing a draft Action Plan regarding the National Anti-Corruption Programme;
- Launching an e-learning tool, 'Doing Business Without Bribery' (adapted from TI UK)[35]; and
- In 2018, several high level engagements and meetings have taken place, in preparation for strategic partnerships.

TI Indonesia has for several years been working with the second biggest state owned company, PT.PLN, and it is now assessed as one of the most transparent state owned enterprises in Indonesia. [36] In 2017, the NC shaped a small national level initiative for improving business sector regulation, effective enforcement of business integrity measures, and to create communities of clean business. The target for the update of the Business Integrity Forum was, however, not reached, although commitment was gained from one of the Indonesia-based holding companies to work collaboratively against corruption.

TI Sri Lanka has started working with Business Integrity through tracking reports on transparency at firm level for the top 50 companies. This will be launched in late 2018, with the hope to start a discussion going in the private sector.

Analysis of results

The intermediate outcome for Demonstrated business integrity is 'Improved business regulation is supported'. This outcome is phrased as a process and not as a result statement, as such it is not clear what intermediate change is envisioned. However, the targets set, have largely been achieved. TI-S considers that this goal provides an opportunity to help connect NCs with stakeholders and resources, as such it is a form of capacity building. The goal has also allowed the programme to connect with NCs outside the region. Even though this goal in the beginning of this programme period was lacking in a strategic approach at regional level, TI-S considers it is helpful to use the regional level for oversight. It was considered that the ability for NCs to access other NCs' expertise has contributed to learning and innovation within this goal, together with access for chapters to have TI-S to facilitate connection and coordination of stakeholders and partners.

As referred to above, TI Mongolia has strong capacity in Business integrity. A contributing factor to internal capacity is potentially its relatively large proportion of Enabling Impact funds as part of its overall chapter budget for the AP Programme, 21 percent, as there is a clear link between external and internal capacity for any organisation.

It will be important for the future, if this goal is to remain, to scale up in a cost effective and strategic manner, and align with the TI movement's focused strategies. And to be measureable and to demonstrate effect, the outcomes intended need to be stated as results sought, and not as processes or outputs.

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[34] Transparency International (2018). *Asia Pacific Programme Annual Report 2017.*
[35] Ibid.
[36] Ibid.

4.2.5 Enabling Impact: A strong TI anti-corruption civil society presence and voice

Intermediate outcomes:
- *Robust internal capacity*
- *Strengthened anti-corruption advocacy and voice*
- *Sustainable and diversified support*

TI-S considers that the entry point to achieving the four change goals is a sufficiently strong and skilled network of national chapters, which are enabled to contribute to policy and behaviour change. In this sense, the Enabling Impact component is not stand-alone, but rather contributing to creating an environment that fosters impact. The activities under Enabling Impact are therefore concurrent with and underpins the other change goals. This is a change from the previous AP Programme 2011-2015, where the focus was to professionalise the movement and build professional capacities within the chapters as a stand-alone component called Institutional and Network Strengthening (INS). In that approach, TI had uniform, standard tools that it offered to the chapters. This made for example setting up a chapter easy and chapters that had leadership and initiative to access these standardised tools did well and are today strong chapters. Those that did not have these attributes were not able to make use of the offering, and did not have access to a demand-driven ad hoc coaching and guidance that met them at their level of capacity and organisational maturity.

For this programme period, support that have been extended by TI-S thus far at programme level and to individual chapters for the intermediate outcome **robust internal capacity** include:

- Management support on several occasions to chapters that were experiencing capacity issues. This included support to TI Sri Lanka in 2016 for media monitoring and a review of internal governance systems and support to TT Vietnam throughout 2017 on various managerial and programme fronts.
- Training and capacity building, for example TI-S conducted monitoring and evaluation regional training for chapters in 2016, with continued ongoing coaching support in the use of the Impact Matrix, including the use of more gender inclusiveness through sex-disaggregated data, and with improved results in 2017 and 2018. TI-S also organised a communications training in 2017 with most programme chapters which was designed to help improve impact thinking and storytelling on social accountability. This has also been followed up by increased external communications, with TI-S working with chapters to publish blogs on social accountability.
- Contributing to strengthened TI presence, by coordinating Pacific chapters to meet in 2016, 2017 and twice in 2018 to forward work on a Pacific strategy. A draft Pacific strategy was in place mid-2018 (refer to section 5, Pacific findings). TI-S also provided support to Afghanistan and Bhutan to further establishing national contacts or projects there.
- Regarding knowledge exchange and experience sharing, regional meetings have been held for chapters to share progress experiences from the programme thus far, and to collect input from chapters for TI/AP Programme regional advocacy strategies, the latter discussed during annual regional membership meetings as well.

Due to the recommendations in the previous evaluation, and due to donors' focus on results in external activities as mentioned above, it was decided that for this programme period capacity building be mainstreamed into each change goal, as such it would respond to ongoing needs from the chapters. In other words, the approach to capacity building changed from a centrally programme-driven structured approach, to a more demand-driven responsive approach, while maintaining a certain level of centrally offered trainings and tools. While there are positive aspects to this, such as encouraging stronger peer-to-peer learning and building and agile and adaptive approach to capacity building, one problem is that to demand something as a chapter you need to be aware that you need it. The approach therefore tend to benefit already strong and aware chapters, at the expense of weaker chapters.

Furthermore, the contribution to strengthened TI presence as it relates to the Pacific has been slower than planned. This has to be viewed in the context of TI-S organisational and governance reforms, with several chairs left vacant, including the responsibility for forwarding the Pacific strategy. Transparency Solomon Islands confirms that over the past year, TI-S has been more pro-active in its support.

In sum, the intermediate outcome robust internal capacity is considered to have been achieved to a varying degree. The conclusion is that TI-S needs to balance the two approaches to creating robust internal capacity, in

other words striking a balance between results driven approach and a centrally planned standardised approach, in which all chapters should to participate in a set of core capacity building and training activities at a regular intervals. This will allow for an institutionalisation of core competencies at national level despite high staff turnovers.

In terms of **strengthened anti-corruption advocacy and voice**, TI-S has engaged on regional and global platforms on several occasions. Examples include but are not limited to continuous engagement with ADB/OECD including sharing experiences from climate change and anti-corruption work from TI Bangladesh and TI Maldives; in 2016 involved in discussions around SDG 16 and convening the Asian SDG 16 coalition to promote civil society work around SDG goal 16; advocacy plan vis-a-vis ASEAN; in 2017, the AP Team supported TI Mongolia and TI Maldives to prepare submissions for Global Anti-Corruption Consortium project in partnership with the Organised Crime and Corruption Reporting Project, as a result both chapters are now working with TI-S on advocacy around findings of local level investigations with global linkages.

An advocacy plan for work on engaging the private sector through ASEAN Business Integrity advocacy was developed by TI-S and the Asian chapters, with focus on enhancing the right to information, and engaging with ACAs and working against illicit financial flows/asset recovery. As a result TI's chapters from the ASEAN region have a) identified opportunities for regional collaboration, and b) developed an action plan that they are already implementing at regional level.[37] In terms of advocating for ACA strengthening, TI-S facilitated participation by TI Sri Lanka and TI Bangladesh, and TI Board at the Global Expert Group Meeting on the Jakarta Principles in 2018, in the context of which commentary on principles of ACAs was made, with strong reference to TI's ACA strengthening initiative. However, since there is not precise results statement for this outcome, it is difficult to measure the Value for Money or effectiveness, without embarking on a separate evaluation of media coverage, key messages picked up and reiterated in other fora, and analysis of exposure and change in behaviours.

To be able to draw on the NCs experiences and connect those with the regional and global level for advocacy purposes, the aspect of capacity is again present. As is noted in TI's recent *Enhancing Transparency International's Global Advocacy*, to contribute to the global advocacy agenda, overall wealth and access to resources become key factors. Organisations from undemocratic or low resource contexts are largely unable to participate at the international level. Instead, well-resourced groups dominate. The conclusion is that global organisations need to be aware of these constraining factors and ameliorate structural barriers by sharing resources and facilitating participation[38]. It will thus be important for the AP Programme to ensure that there is sufficient capacity within all chapters to enable national level contribution to the global advocacy agenda.

In contributing to **sustainable and diversified support**, the AP Team has been active with several chapters to contribute to more sustainable funding bases. The team supported TI Maldives to developed a project that would provide sub-grants to the chapter's CSO partner for social accountability work at sub-national level; it supported TI Pakistan to develop funding proposals, and TI Maldives and Sri Lanka in ALAC related fundraising. In Indonesia, being a categorised as a middle income country and thereby less donors available, the AP Team helped TI Indonesia to secure seed funding to kick-start a business integrity project, and; TT Vietnam was supported to secure several new sources of funding, as it experienced a challenging drop in donor support and capacity in 2015/2016. In sum, the contribution to sustainable and diversified support has worked relatively well for the Asian chapters, but less so for the Pacific. The Pacific chapters have on their own secured some small project funding for discrete initiatives.

Analysis of achievements

Overall, the AP Programme has achieved good results, in addition several issues raised in the final evaluation from 2014 have been addressed, in turn contributing to better effectiveness and efficiency. The results would not have been possible without the component Enabling Impact.

Enabling Impact has on the one hand allowed for a regional presence, voice and programme work, which contributes to cementing the image of TI as an international, cross-border actor, working on thematic issues relevant to the region. On the other hand, through Enabling Impact chapters' work has been coordinated and

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[37] An ASEAN Global Corruption Barometer (with Business Integrity focus) is currently being commissioned by TI-S and will be used by the chapters as an advocacy tool for encouraging business integrity within ASEAN.

[38] May Miller-Dawkins and Katy Southall (2018). *Enhancing Transparency International's Global Advocacy*

supported, and some weaker chapters or chapters experiencing temporary but impartial issues, such as staffing, litigation risk, or unforeseen funding cuts have been supported centrally from TI-S. It is also clear that chapters are very appreciative of the support they do get from TI-S, such as technical advice, tools, trainings, and sharing experiences at regional meetings.

As noted in the beginning of this section, for this programme Enabling Impact was mainstreamed into the change goals. The effect has to some extent been that the chapters that have done well in this programme round are those that received substantial support in the previous programme. These chapters have been able to set up robust governance structures, financial management systems, risk management procedures amongst other structures. The establishment of such structures and procedures are not part of the current change goals, but nevertheless essential to achieve external results and impact.

One to two chapters state that they have not received as much support, this in particular in relation to preparing concept notes and projects for this programme period (as such it falls more on the previous period), where there appears to have been a misunderstanding what the funds could be used for. For the next programme round, ensuring that chapters that would benefit from increased Enabling Impact budget are aware of how this can be used and integrated into their concepts and proposals is important.

Going forward, it will be important to design an approach that allows for separate capacity building regardless of the programme's change goals. It is essential for success to have resources to allow for risk management and coaching and mentoring behind the scenes, and the nature of this will depend on the capacity needs of the individual chapter. TI-S does more of this now, as in the past the focus was more on standardised tools, but there is a need for a stronger recognition of this coaching component and including it in the capacity strengthening approach and method for a new programme.

Assessing the ratio of Enabling Impact funding to overall AP Programme funding at chapter level, it is clear that chapters with a higher proportion of Enabling Impact funds have been able to deploy more comprehensive programme solutions. For example, the proportion of the Enabling Impact component to the AP Programme funds at chapter level was for TI Sri Lanka, 22 percent, a large proportion of which was targeted for deploying the RTI hubs and advocacy work on this, and the RTI work in Sri Lanka is one of the clear successes in the current AP Programme for social accountability. For TI Mongolia, 21 percent of its total budget from the AP Programme is for Enabling Impact. For this NC, the programme on Business Integrity has been very ambitious and successful, some of the enabling impact funds went to media coverage of launches and advocacy work, with the NC being very successful in promoting its activities and received extensive media coverage.

Conversely, for TI Papua New Guinea, their Enabling Impact to overall AP Programme budget was only 4 percent. While for most chapters funding from the AP Programme is not the only source for corporate, internal or overhead services, if chapters with more vulnerable capacities and as a result less results achieved had asked for a higher proportion of Enabling Impact in its AP Programme proposal, with for example more funds for strengthening internal or external advocacy capacity, it is possible that they would have been able to see different results of their work. This leads to the conclusion that it is important for next programme round to support weaker chapters to know how to use the Enabling Impact component better in the design of the proposals, to increase the potential for these chapters to maximise the impact of their external work.

In terms of a regional voice and presence, it is clear that the AP Programme has been active and involved in many initiatives. However, the impact and cost effectiveness of this has not been possible to establish within the scope of this evaluation, and requires evaluation of *inter alia* media presence and public perception.

4.3 Overall effectiveness and impact

Guiding evaluation questions:
To what extent can the future impact of the programme be determined already at this stage?
What factors may contribute to this (positive or negative) impact? Who are the key beneficiaries of this impact, and who is not benefitting or unlikely to have benefitted in a few years' time?

Generally, a long time period is usually required in order for anti-corruption work to demonstrate long-term impact. However, in several countries reviewed it is clear that a lot of ground work has been laid down by the Asia Pacific TI movement and that some intermediate outcomes are on track for being achieved across the programme.

To measure impact, TI uses an **Impact Matrix** to assess progress towards change that leads to a reduction in corruption. It uses this to understand how it can increase the effectiveness of its work and maximise impact. The impact matrix outlines two main areas of change TI is aiming to achieve. These are Policy and Institutional change and Behaviour change. The impact matrix describes the various components that together create the pathways to achieve change and the desired impact. The various components are interconnected and build on each other. In other words, these can be staggered differently depending on the country context.

> *"TI-C has played a crucial role in lifting and creating awareness around corruption. The Executive Director is regularly on radio, and has his own programme. When he is out in the provinces people recognise his voice!"*
>
> *"There isn't really anyone else who could mantel the role TI has. In a very short space of time, the organisation has managed to establish itself as a credible, very competent [anti-corruption] actor, in a very difficult field."*
>
> [Stakeholders in one country visited]

Assessing the AP Programme's impact against this matrix, it is possible to discern some **behaviour change** already, with an increased case load for people seeking redress against corruption. This can be attributed to innovative approaches and a high number of underlined outreach and awareness activities by NCs and their partners. Under the section on effectiveness, several examples of this was mentioned, one of which was Nepal, where ALAC outreach by 25 Affiliated Organisations has raised awareness and motivated people to seek redress against corruption. A contributing factor in Nepal was the connection of local communities with their local level representatives, resulting in better accountability and better case resolution.

Due to the good progress in strengthening anti-corruption legislation, in some countries there are better institutional processes and more policy adoption and amendment in government. For example, there are multiple examples of policy adoption and amendment in Sri Lanka. In Pakistan, there were improved enforcement of policies for government institutions, where two arrests were made on corruption charges, following anti-corruption rallies by TI Pakistan and a local partner. There is less evidence of this amongst business and political parties, with one exception being Maldives, but for political parties this evaluation has not collected any data. This means that there is some **degree of policy and institutional change**, but that more efforts need to be made in enforcement and in instilling those changes in businesses.

4.4   Efficiency

> *How far funding, personnel, regulatory, administrative, time, other resources and procedures contributed to or hindered the achievement of targets*

Guiding evaluation questions:
How efficient are the working relationships between TI-S and the chapters?
How suitable is the current organisational structure for achieving positive progress of work?
Going forward, what can be done differently to improve efficiency, and effectiveness?

The efficiency of the Programme is considered relatively good, with the key factor being the TI movement itself, due to its collegiality, peer-to-peer learning, and support from TI-S. A few key themes relating to efficiency and utility orientation has been picked up in this evaluation, and they are discussed in this section.

4.4.1 Relationships between TI-S and the National Chapters and organisational structure

In the previous programme period, TI-S was considered by some evaluation participants to have managed the NCs more closely and from the position of a donor. The final evaluation of the previous programme pointed out that management of the programme was centralised and that a more decentralised approach with more ownership would have been more efficient.[39] Now, however, all NCs consulted consider the working relationship to be very good, understanding and flexible. The AP team is considered highly responsive and are very appreciated amongst all NCs consulted, including the Pacific chapters consulted (PNG, Solomon Islands and Vanuatu).

> *"We are happy with the new improved relationship we have with APD. The team there now is very approachable and very understanding of our needs."*
>
> *"The good thing about the TI movement is that TI-S does not dictate what we can do, we can change things."*
>
> *"The TI AP Programme model is flexible enough to allow for changes."*

However, the Pacific chapters think that they need increased focus and attention, in particular considering the importance of TI in the Pacific (refer to Findings relative to the Pacific, section 5).

All TI NC representatives and staff consulted praised the benefits of the TI movement and of the opportunities for horizontal collaboration across NCs. This organisational format appears to foster organic learning and innovation.

> *"The main benefits of being part of the TI-movement is that you don't feel alone".*
>
> *"Without the movement, we would just be a regular CSO, with much less impact".*

The international links are considered to help build a capable team, and to connect with NCs working on similar cases and/or issues. The importance of getting together at annual meetings and similar events was highlighted, with many benefits flowing from opportunities for experience sharing. TI Sri Lanka noted, for example, that the idea for business tracking (goal 4) came from TT Vietnam, which presented a similar concept at an annual chapter meeting, and that this is a good example of how helpful it is to be part of the TI movement. TI Cambodia holds that the first time they heard about ALAC as a concept was at a regional meeting in 2012. TI-S then helped TI Cambodia to link up with countries that already had ALAC programmes, to seek advice and inspiration.

4.4.2 Cost-effectiveness of Enabling Impact

To assess Value for Money for Enabling Impact, it is necessary to have some results statements in place. These would be measurable outcomes that demonstrate the change sought within individuals, the chapters and their partners. Some support that fall within Enabling Impact are less tangible, and more process driven, but it should be possible to determine what an end state with this component may look like and to what degree this

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[39] DeveWorks (2014). *Final Evaluation TI Asia Pacific Regional Programme.*

has been fulfilled. At the moment, this component is output driven, as such a proper cost-effectiveness analysis is speculative.

Notwithstanding the above challenge, this evaluation considers that the Value for Money of Enabling Impact is at least at medium level and potentially higher. While it has enabled strong results in some places, the efficiency of the work of some chapters could have been stronger were these chapters able to access stand-alone capacity strengthening support. While the approach to mainstream Enabling Impact into the change goals has been efficient and effective for some chapters, others have received *ad hoc* coaching support from TI-S when needed, but would have benefited from a separate component aimed at creating a strong movement. The peer-to-peer learning approach taken has contributed to learning and is coordinated by TI-S, and it has been combined with some structure training and resources from TI-S. However, a slight shift of the pendulum to more structure and a key/core programme of training package is recommended. Weaker chapters may not access an *ad hoc* resource as they may not be aware of their needs and therefore don't seek it out.

4.4.3 Administrative procedures and processes

Quarterly reports

Each NC with funding from the programme has to submit quarterly progress reports to TI-S, and changes to NCs' activities and programmes are communicated in these reports. There are divergent views amongst several respondents regarding the efficiency of the reporting process, including the process pertaining to feedback. One evaluation participant noted that they did not know how the programme as a whole was performing and welcomed feedback on this. They also did not know whether the information provided was considered useful by TI-S and welcomed more feedback on the quarterly reports.

There appears to be very little, if any, contact and co-ordination between donors on the point of reporting. The previous end-of-programme evaluation (2014) concluded that efficiency is lost by the lack of donor harmonisation and the resulting multiple and inconsistent reporting requirements.[40] The reporting is by some considered burdensome and donor-oriented, and not utility-focused for the NCs. Another participant concurred that it is too burdensome and a problem that each donor has its own reporting requirement.

TI Sri Lanka has developed their own solution to the multi-donor reporting requirements. They have organised the programme teams to send progress reports once a month to their MEL responsible person in a master reporting template, from which information for each donor and reporting is sourced. This is something that could be adopted by other NCs.

Several interviewees recommended moving to 6-monthly reporting, especially since there are weekly phone/Skype meetings between the TI-S AP Regional Advisors and each NC, a format in which pressing issues and risks can be raised. This suggestion was also echoed in the results of an open ended survey on administrative efficiency.

Needs and skills matrix

One evaluation participant welcomed a 'needs assessment' of the implementing countries, to assess what needs the NCs have in implementing their work, whether it be technical, policy advice, networking and contacts.

ALAC database

There are different views on how well the ALAC database works. One NC considered it effective as an advocacy tool, yet this NC still welcomed more training in the efficient use the database. Another NC considered the current database, or the lack of training in how to operate it optimally, had very large efficiency implications and that their ALAC was not able to use it as desired for advocacy and policy purposes. This issue was noted in the final evaluation of the past programme period and it appears that there is still a need to put in place ALAC database training for new NC staff.

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[40] Ibid.

4.5   Sustainability

> ### *The potential for continuation of impact achieved after the end of the grant*

> *Guiding evaluation questions:*
> *To what extent is it possible to determine sustainability of the achievements made thus far?*
> *What are the conditions for sustainability already in place?*
> *To what extent is there sufficient leadership and institutionalisation among chapters and other partners to ensure sustainability?*

Within the scope of this evaluation it has not been possible to determine the potential for the results to last beyond the end of this programme period. For most goals, it is likely that more time is needed to cement what has been achieved thus far.

However, with use of analysis based in sustainability theory, it is possible to establish whether some of the conditions and prerequisites that are considered essential for long-term results are present within the institutions and actors that are expected to be the guardians of the results achieved. In assessing whether those prerequisites and conditions are present, four key questions are important to consider:

1. Is the programme needs-driven?
2. Is there sufficient thematic and technical knowledge amongst the actors?
3. Do all participating actors share the same vision?
4. Is there ownership amongst implementing organisations, TI and local partner alike?

In determining whether the programme is needs-driven, it is possible to draw information from the analysis made under evaluation criteria relevance (section 4.1). From this analysis, the conclusion is yes, at an overall programme level the programme is relevant to the needs of the region and those of the participating countries. Within each country context, there is likely to be a need for constant new iterations, but the four goals of the programme broadly capture the most relevant corruption needs to be addressed. However, an assessment of whether a programme is needs-driven should ideally also consider needs expressed by the beneficiaries. This aspect has not possible to establish within the scope of this evaluation.

Is there sufficient technical knowledge amongst the actors? The answer to this question is overall yes, but all chapters note in surveys, in interviews and in quarterly reports that they wish to be further supported in technical fields and to be up-skilled in particular areas. TI-S can contribute to this by providing access to niche expertise and staying abreast of NCs different capacity needs. Surveys have also confirmed that, overall, NCs consider that this is available to them.

Do all participating actors share the same vision? This is difficult to establish, as actors also means the partners that the TI movement has enlisted to implement the programme. As for TI alone, it appears from the discussion on alignment that there is to a large extent a shared vision in terms of the programme's overall mandate and objective.

To answer whether there is sufficient ownership, it is important to consider the aspect of participation. Participation is essential for institutionalisation, long-term results and positive change. The participatory aspect also has clear gender perspectives, and means that both women's and men's views, needs and priorities are accounted for. It appears to the evaluator, primarily through interviews, that there is strong participation at NC-level, where most of the implementation of the programme lies. It has not been possible to draw any conclusion in terms of the participation and ownership felt amongst TI's partners.

NCs were in the survey asked what factors and conditions they considered needed to be in place to ensure long-term results of the investments under the AP Programme. On a scale from 1 to 5, with 1 as the least important and 5 as most important factor, expertise/capability scored highest, followed by leadership, partners, conducive political environment, and last funding.

Factors and conditions necessary to ensure long-term results
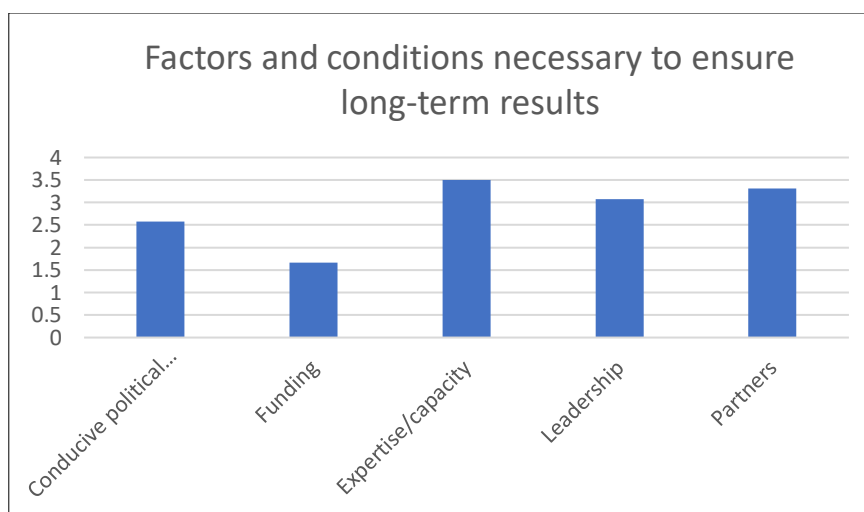
In term of leadership, TI-S can continue facilitating lateral connections between NCs and encourage mentoring opportunities. In terms of leadership at country level partnerships, NCs are already demonstrating leadership in addressing corruption in civil society and institutions alike; the next challenge is to encourage other actors to take on that leadership and independently pursue anti-corruption activities.

In addition to the four key sustainability questions raised above, for some NCs, core funding is the bottom line concern for sustainability. Without it, focus is diverted from results and spent instead on chasing funding, with additional negative implications on the overall stability and well-being of the organisation. If a NC has core funds, it is easier to attract project funding. It is therefore essential for TI-S and DFAT to assess the ease and feasibility with which a NC can attract core funding from other sources in a particular country.

Having experienced a sharp cut to the bulk of its funds in 2015, when DFAT pulled back a lot of its support, TI Papua New Guinea gave more priority to being self-supporting. As a result, every time the organisation plans new projects, a funding plan B is developed, in case the original funding source were to disappear. For example, the NC bought the premise it is operating from, and rents out a back section of this to another organisation. The property in turn was bought from the money they organisation had raised after 11 consecutive years fundraising through the 'Walk Against Corruption', a successful annual fundraising initiative.

TI Papua New Guinea's corporate sponsorships mainly come from corporate memberships. It is now about to trial a graduate membership programme, based on course fees from transparency and accountability training for companies.

For TI Cambodia, the Swedish Embassy has provided core support since the birth of this NC. As far as this donor is concerned, this was a necessary prerequisite for TI Cambodia to be able to start as an organisation and stay operating. While Sweden would like to see other donors assisting in providing core support here, it appears difficult to attract other donors.

Two different kinds of country categories appear to have a bigger challenge in attracting core funding. One is those that have recently transitioned to Middle Income Country status. The other is Pacific Chapters. The classification of countries is done by the World Bank based on per capita Gross National Income. In recent years, several countries have moved from the low-income group to the group called lower-middle-income countries, a sub classification of MICs. However, income distribution is not taken into account when countries are classified. In countries recently reclassified as middle income, the majority of the population remains poor even as the country might be getting richer because concentration of wealth. MICs, especially the lower-middle-income countries, face huge challenges in lifting millions out of extreme poverty. The re-categorization of many of these in the last decade has meant losing trade and tariff concessions given to least-developed-countries (LDC), as well as the loss of certain ODA funding exclusive to LDCs. This means that overall there is less funds and resources available for civil society organisations, whether it be private sector or ODA funds.

For Pacific countries, there is lack of private sector funds, and because of the nature of the relationships on account of small populations but with dominant government, bilateral donors are careful with whom they are seen partnering. Therefore, it is difficult to raise core funds for Pacific chapters from bilateral donors at post.

4.6   Gender

> ➢ *Review the systems and processes in place to improve gender equality*

For this evaluation, it was important to review the status of the AP Programme's efforts to improve gender equality, as previous DFAT Aid Quality Checks have underscored the need for TI to enhance this aspect. The conclusion this evaluation draws from reviewing the systems in place to address gender as a perspective is that TI-S does not have an institutional approach to gender mainstreaming, but that it does provide chapters with some support in this regard. The chapters, in turn, are with varying degree paying more attention to this perspective. However, for most part, across the programme, gender is taken to mean "increasing women's participation", whereas being gender responsive means understanding underlying norms that may hinder either gender's access to information and affect their opportunities. In other words, it is about the qualitative aspects as well as quantity and means designing programmes and projects that are relevant to the needs of both women and men.

At TI-S, there is no gender advisor, but gender working groups are set up for particular topics, and different work streams integrate gender. The AP Team has also organised webinars on gender aspects on particular corruption themes. There are exchanges between the AP Team and NCs on gender aspects, for example, in quarterly reports, and since the second quarter of 2018 the quarterly reports include a new section called 'Work on gender' in which chapters are to describe if and how they have taken gender into account in programme implementation.

In the evaluation survey, almost half of the NCs had answered that perspectives related to gender and vulnerable groups had been sufficiently addressed in the design and planning of the activities, and 27 percent that perspectives were considered to some extent. In practice, the degree to which chapters work consciously with gender mainstreaming is however very varied.

> *"My chapter has focused on gender equality so we have tried to increase number of woman staffs in office and encourage women to participate in our events or outreach activities. With this purpose, my chapter adopted Gender Mainstream Policy. Each project has to apply this policy into the project activities."*

In Cambodia, interviewees stated that gender had not been a focus in the past, but that this is changing now. This view was shared by the Swedish Embassy in Cambodia, the organisation's core funder, whom a few years ago commissioned a gender assessment of the organisation, with similar conclusions, and that since then TI Cambodia has done work on institutionalising a gender perspective in the organisation (it now has a Gender Mainstreaming policy). In Sri Lanka, the NC's fourth strategic pillar is 'Inclusive Governance', which facilitates addressing vulnerable groups and inclusiveness at a more strategic and deliberate level. In addition, the NC has several key programme managers who, due to personal professional interests, have a gender focus. As a result, many of the TI Sri Lanka's programmes are gender sensitive. The NC as a whole has not had any gender mainstreaming training (but would welcome this).

TI Nepal has reported that women are now incentivised to participate in the outreach activities and come forward, which is a change from the beginning of the programme period. These days, the organisation specifically targets women's groups with their ALAC work, and they attribute this change to feedback received from TI-S:

> *"Many times when we send quarterly reports to TI-S they ask us, "Why have you not reached more women?". This type of feedback we welcome and it encourages us to find other solutions. It is good for programming."*

In other countries, this evaluation encountered a few contrasting comments:

> *"Gender has not been a problem for us."*

> *"There are so many women's and gender programmes that I feel 'let other people and agencies do that'".*

The above two quotes demonstrates a lack of awareness of the relevance of a gender perspective.[41] The conclusion is that more needs to be done to first, raise awareness of the relevance of this perspective across the programme, and secondly, how to mainstream gender into planning, implementation and evaluation.

Survey participants from the NCs were asked if they get sufficient support, tools and guidelines form TI-S regarding how to mainstream gender into their programme and activities. 73 percent of the respondents are either not getting sufficient support, get some but not much, or get some support and access to tools and resources but need more in some areas.

Do you get sufficient support, tools and guidelines from TI-S how to mainstream gender
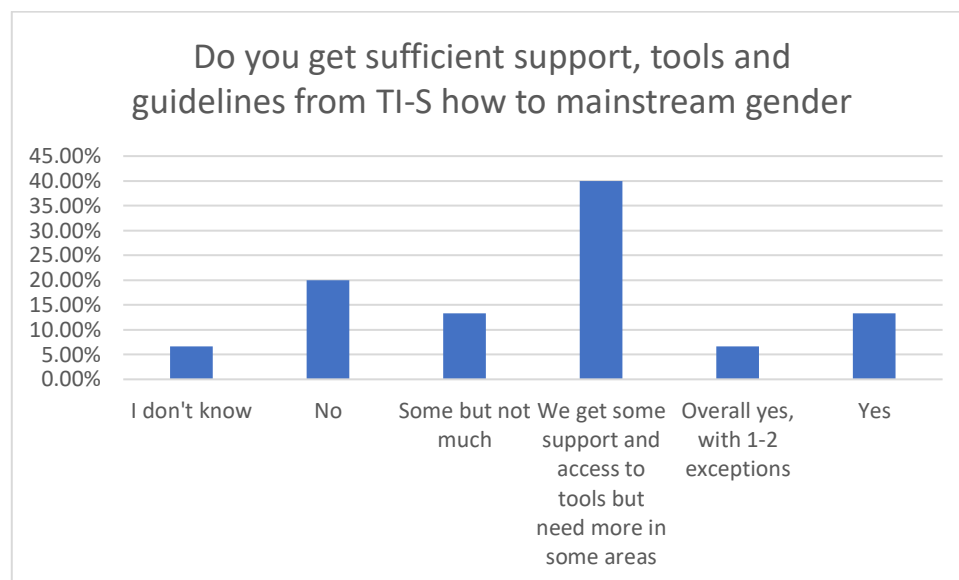
It is important to emphasise that gender is not (only) about numbers. Gender equality needs to address representation as well as the underlying norms that, if left unchallenged, mean that programme designs and focus may not contribute to address existing gender inequalities. Gender responsive programming attempts to address this by mainstreaming gender as a perspective throughout the programme and project cycles. As a result of such an approach, different projects may be planned, the delivery mechanism of an activity may be different, and, the participation may be different.

There are different approaches for how to raise awareness on gender and improve programming, and to ensure lasting institutionalised results in this regard. A combination of a gender resource person at TI-S to work on organisational strategies, policies, mainstreaming tools, chapter facilitation and capacity strengthening, together with peer-to-peer learning, is likely to generate most effective and lasting results.

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[41] Refer to the competency ladder, with four steps: 1) Unconscious incompetency; 2) Conscious incompetency; 3) Conscious competency; 5) Unconscious competency.

4.7   Monitoring and Evaluation

> ➤ *To what extent is the M&E system being used to effectively measure progress towards expected outcomes, drive innovation and support learning?*

The final evaluation of the previous programme (2014) concluded that there was inefficiency losses due to weak MEL and that NCs mainly reported activities and had low awareness of causal links to results and outcomes. Since then, TI's impact matrix and MEL tool (TI Monitoring Guide *"Are we on the road to impact?"*) has been designed and implemented in the organisation. A commitment to monitor and assess the impact of the TI Movement was also included in the *Strategy 2020*. For the Asia Pacific chapters, a workshop on the impact monitoring approach was held in 2016 in Bangkok with participants from the TI Mongolia, Cambodia, Nepal, Vietnam, Sri Lanka, Pakistan, Maldives. Several of these NCs are now using the impact matrix for their own assessment and planning, as well as to train their own staff in the method, such as Cambodia, Nepal and Sri Lanka, a sign of an uptake of the MEL system.

The Impact Monitoring Approach is not used for the quarterly programme reporting, as these reports are partly focused on progress on activities and targets, and targets do not form part of the new impact matrix. However, the quarterly reports include prompting questions on overall outcomes achieved and attribution of success or failure thereof, all of which could lead to raised awareness at chapters in outcomes oriented thinking. The quarterly reports demonstrate varied level of uptake on results- oriented versus activity or transactional thinking, but it appears that overall there has been significant improvements since the 2014 final evaluation.

To the survey question, "can you rate the nature of the support and guidelines you have received from TI-S regarding monitoring, evaluation and learning over the last two years", 47 percent of the NCs said that they had either received some support but still need assistance to raise their MEL capacity, or that they had received very little support and need to raise their capacity in MEL. A Total of 40 percent said that they had either received excellent support and as a result have raised their MEL capacity, or that they have received good support and need to focus on further improvement of MEL in their programmes.

In terms of learning, the quarterly reports include good sections to foster self-reflection and learning, in particular when there is a constructive feedback process between the chapter and the designated TI-S staff. Several NC interviewees reported that they have got key ideas from the feedback by way of tracked changes in these reports. This mechanisms should be more streamlined at TI-S and used more consistently, as some NCs receives no feed-back but would welcome it.

Aside from the formal MEL system, the impact matrix and results frameworks' targets, the regional meetings facilitated through the Enabling Impact component are highly valued by all NCs consulted in terms of fostering learning and innovation viewpoint. Many evaluation participants report that they have received key programme ideas from other NCs at such meetings. Furthermore, several NCs have their own meeting structures in place for self-reflection and learning, whether is bi-weekly, monthly or quarterly, usually fully participatory staff events. This is very promising, and contributes to a TI being a learning organisation, which is another condition for sustainable results.

4.8   Conclusions and lessons learnt Asia Pacific Programme 2016-2018

Relevance

The AP Programme is relevant to and aligned with TI-S, NCs, and DFAT's priorities and strategies. For TI-S, the AP Programme is aligned with *Transparency International's Strategy 2020*, but should assess how it can better align with and contribute to TI's new focus and global advocacy goals, dirty money/grand corruption and political integrity. For DFAT, there is strong alignment with the Australian Government's Aid Policy and its strategic priority for effective governance, however, the AP Programme needs a stronger Pacific focus given Australia's Pacific Step-up.

The programme is very relevant to, and for the most part aligned with, regional national priorities including those of the NCs. Regional relevance and trends are confirmed in the Global Corruption Barometer and in the strategic priorities of regional bodies and organisations, and align with change goals of the AP Programme. The relevance of Goal 1 (enhanced social accountability) - at the country level was confirmed by a broad range of stakeholders such as donors, partners, government authorities, and NC representatives. And even though TI is shifting focus more to enforcement of existing laws, new and improved anti-corruption legal frameworks are still needed in many countries, therefore Goal 2 is still relevant. Goal 3 (strengthened enforcement of anti-corruption mechanism) is relevant as in several of the participating countries there are good legislative frameworks in place, but poor enforcement and weak capacities of the ACAs. As ACA are critical in ensuring that the citizens, public institutions and business adhere to non-corrupt behaviours and practices, an unwilling and uncooperative ACA makes progress on other outcomes challenging. Finally, Goal 4 (demonstrated business integrity), is strongly relevant for the Asia Pacific as a region. There is, however, variability in the uptake of this area in the NCs' strategies and alignment is therefore only average. Going forward, it will be necessary to have a strategic regional approach for this goal, and making the vertical linkages between TI's global priorities for private sector, with those of the AP region and the country needs.

Effectiveness and Impact

For anti-corruption work to demonstrate long-term impact, longer time intervals are usually required. For this reason, intermediate outcomes are in place. In several countries these are on track for being achieved across the whole AP Programme. However, due to pressure on civil society space and politicisation of anti-corruption initiatives, some initiatives could not be carried out, in turn impacting on the overall programme progress.

For goal 1, social accountability, there is evidence that opportunities for people to hold leaders and institutions accountable have been raised, there are a very high number of awareness raising activities completed, and the opportunities for people to participate in structured social accountability activities have increased. Some countries have been successful at integrating the key social accountability actions and building pressure for change at the local, sub-national and national levels. Despite overall good progress towards the outcomes at programme level for social accountability, this progress is varied across the participating countries. Several countries need to do more at integrating the different aspects of social accountability, which often means aiming for a better reach through innovative mechanisms, coupled with facilitating citizen's to more effectively hold decision makers accountable at the appropriate level. However, there is need for further beneficiary evidence of the impact from this goal, beyond providing opportunities for people. It will be important to establish what changes the goal has contributed to, at individual and institutional levels, in order to develop an evidence base for adjusting and improving a future programme.

For goal 2, strengthened anti-corruption legislation, there is substantive progress towards the intended targets, as a result progress towards the intermediate outcomes 'new anti-corruption legislation tabled and passed' and 'improvement of weak existing anti-corruption' is very steady. In terms of enforcement, goal 3, more time is needed to see the intermediate outcomes and the results in this area come into fruition, but there appears to be strong progress against the strategy and plan for this this. For goal 4, demonstrated business integrity, there are some relevant initiatives at country level, but these are more small projects at the inception stage. Goal 4 at programme level therefore has further to go before reaching the intermediate outcome 'Improved business regulation is supported'.

Enabling Impact has contributed to several programme achievements. These include Sri Lanka's budget allocation under Enabling Impact for starting its RTI programme, and Pakistan's strengthened internal capacity thanks to capacity building funds as part of its budget under Enabling Impact. In addition, under this component, TI-S had a very active involvement in the re-design of TT Vietnam's AP Programme which now consists of *inter alia* a successful anti-corruption legislation initiative, with a more diverse set of funders. However, going forward, it is important to consider an untied capacity strengthening component, as well as for the AP Team to contribute to an equitable distribution of Enabling Impact funds, particularly funds that can be allocated already at the programme concept and proposal stage for a future programme period. Some chapters, typically already strong ones, have known how to design proposals with a large Enabling Impact component, whereas others have a very small portion of this programmed into their national budgets.

The programme would generally benefit from stronger linkages between the goals, at central and national level alike. At TI-S the goals are worked on quite separate from one another. There has been reasons to do this during this first phase of the programme, to allow focus and adapting specific technical support at the country level to the specific intervention areas. Going forward, however, making the logical horizontal links between goals more explicit would enable a better managing for shared outcomes and allow for efficient and innovative cross-goal programme solutions and ideas. At country level there are several examples of where this is done. Typically, smaller chapters with scarcer resources have been better at this, enabling for example a better use of the ALAC function in the legislative work, or in integrating the private sector in policy formulation as well. Making connections to TI's global agenda will also be key, especially for goal 3 and 4.

It is recommended that TI-S review its Theory of Change, and articulate results-oriented outcome statements and targets. At the moment, several intermediate outcomes are phrased as processes or outputs, consequently it is not possible to follow up intended effect. And, in order to better determine impact, it is important to establish and use correct terminology for beneficiaries, target groups and stakeholders. It is difficult to measure results and impact without a very clear idea of who exactly an intervention is for and why. The AP Programme is broad in focus, and different stakeholders, target groups and beneficiaries are involved and expected to benefit from the interventions.

Efficiency and organisational support

It is clear that TI is seen as a true "movement" by participants. There is a strong sense of collegiality and shared mission held by all NCs. This results in excellent horizontal collaboration and the NCs and TI-S alike are generous with sharing experiences with each other. This provides a basis for an efficient and innovative organisational structure that is conducive to learning, participation and ownership, underpinned by the Enabling Impact component. The collaborative approach from the current TI-S AP Programme team, as well as TI-S resources and support, have impact and are appreciated. NCs particularly appreciate tools (terminology, access to methodology) and assistance with connecting with other NCs.

Yet, efficiency can be enhanced by a redesign of the Enabling Impact component, combining aspects from the previous programme and the Institutional and Network Strengthening component, with the change goal orientation of this programme period. As part of this, a slightly more structured approach to capacity building will allow a more even spread and chapter exposure to the strengthening of the essential skills and competencies. In addition, the current *ad hoc* coaching and mentoring support extended by TI-S to weaker chapters should be strengthened and part of a new approach.

Smaller NCs are asking for administrative support related to aspects such as the accreditation processes and preparing and packaging funding proposals. Furthermore, evidence points to a need for more support and intervention by TI-S in high-profile corruption cases, and for access to technical resources and support relating to the development of specific legislation. Finally, processes relating to the quarterly reports can be improve. There is inconsistency in the feedback given by TI-S to NCs on the reports, and the frequency is not ideal for several NCs who find that their capacities are constrained with the current reporting interval. A change request, risk and issues management procedure could be developed instead, according to which important changes to an NC's programme need to be approved, and medium to high risks and issues acknowledged by TI-S. This could be done by the NC submitting a filled in template describing the required change, the risk or the issue.

Sustainability

For most goals, more time is needed to cement the results and initial changes achieved so far. It is therefore not possible to at this stage determine the likelihood of the sustainability of changes already achieved and those to come. It is, however, possible to establish whether some of the conditions and prerequisites that are considered essential for long-term results are present.

One such condition is a *needs-driven* programme. At an overall level, the AP Programme is relevant to the needs of the region and those of the participating countries, even though needs expressed by the beneficiaries of the investments have not been establish within the scope of this evaluation. The second condition, *technical knowledge and competency* amongst the actors involved, exists, but all NCs note in surveys, in interviews and in quarterly reports that they wish to be further supported and capacity strengthened particular technical areas. A first step in responding to this need is for TI-S to develop a skills and capability gap matrix, and consider a somewhat more structured approach to capacity building. The third condition, *shared vision of the goals,* as for TI alone there is to a large extent a shared vision. Finally, *ownership* needs to consider the level of participation across TI's partnerships. There is relatively strong participation at NC level, but it has not been possible to draw any conclusion in terms of the participation and ownership felt by TI's partners.

For some NCs, core funding is the bottom line concern for sustainability. Without it, focus is diverted from results and spent instead on pursuing funding, with additional negative implications on the overall stability and well-being of the organisation. It is therefore essential for TI-S and DFAT to assess the ease and feasibility with which a NC can attract core funding from other sources in a particular country, and to determine whether a specific category of countries can or should be allocated core funding from the AP Programme.

Gender

Promising improvements have been made both within the AP Team and at chapter level to enhance a gender perspective in the programme. However, there is a varied level of awareness of the relevance of a gender perspective at NC level, and the degree to which NCs work consciously with gender mainstreaming is inconsistent.

At TI-S there is no institutional approach, i.e. no gender advisor or gender mainstreaming policy. It is important to address this, in order to ensure that the investments to combat corruption are equitable and reach all. Awareness of the relevance of this perspective needs to be raised as a first step, and a second step is how to mainstream gender into planning, implementation and evaluation, bearing in mind that gender equality is not just about women's representation.

Monitoring, Evaluation and Learning

The AP Programme's monitoring, evaluation and learning (MEL) has improved since a previous evaluation in 2014. TI now has its impact matrix and several NCs have been trained in how to use it and are using it to evaluate their work. In addition, several NCs engage in self-reflection and learning through regular participatory meetings at the country level, and this contributes to learning, innovation, ownership and thereby to sustainability. In addition, quarterly reports have sections that should trigger self-reflection and learning.

Some NCs are, however, not using the impact matrix. TI-S should encourage or require these NCs to take these up. The tool is made in such way that it contributes to self-reflection and moves the thinking away from activity focus to impact and behavioural changes. This could generate better capacity at analysing impact across the programme, and improve consistency of monitoring reports, thereby data consistency for overall programme analysis. For the same reason, TI-S could consider consolidating the impact matrix and the targets from the AP Programme results matrix, used in the quarterly reports. These are currently not aligned and consolidated.

Lessons learnt specific to change goals

Social accountability

- *Systems view on Social accountability*: Countries that have worked with vertical integration at local, regional and national levels have been able to build more sustained pressure for change. The vertical

integration model that TI-S invested in developing and which has been used in the mapping of the AP Programmes Social accountability activities (and discussed with chapters in webinars) could be used by NCs to inform gaps in their respective countries.

- *Better reach*: mechanisms such as mobile ALACs, partnerships and modern/mobile technology matters for a better geographical reach, especially in bigger countries. On partnerships, TI can reach even more communities by working more with partners. While TI in some countries has outreach in many regions and provinces, more can be done to reach a broader spectrum of the population in other countries. TI cannot do this alone, it has to work more in coalitions.

  Mobile ALACs have proved to be very effective in reaching a bigger segments of the population, demonstrated by several countries. In addition, on-line ALAC tools have enable people to access ALAC services remotely on-line. Once NC recommended TI-S to invest in developing an ALAC app, an investment that is likely to increase access to the ALAC services significantly.

- *For training*, it is important for NCs to assess upfront whether breadth or depth will generate most impact. Training is different to advocacy and a narrow scope and more in-depth focus in one district or region is likely to result in better outcomes in terms of change sought at individual beneficiary or target group level. It would mean better return on investment than covering a bigger geographical area. It is also important to build in budget and mechanisms to follow up and evaluate training, to understand impact and change. Cost efficient alternatives for this is to do it remotely, using e-tools.

- *Use of success stories and good examples*. Some countries are very good at using and promoting success stories, in order to convince people to come forward with complaints or to speak up. This has been done successfully using innovative media partnerships and other campaigns that attract attention and interest. It is important for any NC to communicate good examples to the public domain in order to get attention, expand their profile and stimulate a cycle of success. TI-S implemented training and publication with stories that chapters and TI-S used for social media and other channels, to engage stakeholders. Some chapters are yet to integrate this into their campaign and marketing strategies for more powerful messaging and impact of communications.

Strengthened anti-corruption legislation

- *Integrating Social accountability and business integrity in anti-corruption legislation.* This allows for horizontal integration of the goals and can generate impactful results and innovative solutions. For its work on anti-corruption legislation, TT Vietnam has integrated aspects of social accountability and space for civil society and the business community in a legislative setting, creating a strong partnership and coalition for the anti-corruption voice in the country.

Demonstrated business integrity

- *Lack of strategic approach at programme level.* Demonstrated business integrity is a new area for the AP Programme. The goal at programme level has until present been the sum of the activities implemented at national level, without a shared strategy or vision. However, work on this is progressing, including amongst ASEAN TI chapters, distilling shared priorities and focus for 2019 and beyond.

- *Strategic assessment of most pressing business* needs in a particular country would be the next step for Goal 4. This in order to focus on the most relevant strategy for contributing to policy and institutional change for and within businesses, rather than a supply-driven approach where activities are done because there are resources and tools available for that type of activity or project. TI Mongolia, Cambodia (and TI Malaysia) did this in 2017/18 through the Business Integrity Country Agenda (BICA) assessment, a highly relevant tool in this context.

- *Policy coherence for businesses*: there are countries where government agencies issue conflicting rules and regulations, which contribute to small and medium sized businesses electing to not follow the rules, because of the legal uncertainty or loopholes created or because the rules are consequently too burdensome, and instead pay government officials off.

5 FINDINGS RELATIVE TO THE PACIFIC

> *Guiding evaluation questions:*
> *What are the most pressing anti-corruption needs in the region and the specific Pacific country of study?*
> *What worked well and was the strength of the previous Pacific programme and chapter?*
> *What factors contributed to the change and the closing down of the programmes and projects?*
> *How can TI run a successful Pacific programme again?*

5.1 The Pacific Context

5.1.1 Structural constraints

The Pacific Island Countries (PIC) face specific development challenges associated with their limited geographic size, small population, dependencies on a narrow resource base, remoteness from large markets, limited international trade opportunities and vulnerability to natural disasters. The small population size means that there are limited options for developing a domestic economy large enough to sustain the country in terms of jobs, revenue and production of goods and services. Geographical remoteness raises trading costs, which affects competitiveness of exports and cost of imports. The geographic dispersal of the PICs limits opportunities to benefit from economies of scale in service provision. Limited natural resources, including land mass for some PICs, make the countries import dependent and extremely vulnerable to exogenous economic shocks such as reduced fishing revenue, volatility of foreign exchange rate, reduced remittances and aid level fluctuations. These vulnerabilities are further exacerbated by the impacts of climate change.[42]

Evidence from national poverty studies suggests that income inequality has been rising over the last 10 years, even in those countries where there has been a reduction in poverty levels. Reports on the SDGs indicate that, despite increasing levels of overseas development assistance and large investments in service delivery, public spending by PIC governments has generally not led to better development outcomes. With at least half of the population in the Pacific being under the age of 25, these challenges are even more threatening to the sustainability of PICs. Young people in the region are six times less likely to secure a job than older workers. Inequalities along gender and rural-urban lines are also striking and increasing. All of this has prevented almost all of the PICs from achieving the SDGs.[43]

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[42] Allen + Clarke (2017). *Evaluation of New Zealand's Development Cooperation in Tuvalu.*

[43] UNODC. *UN Pacific Regional Anti-Corruption Project. Project document*.

5.1.2 Corruption in the Pacific

Governance of the PICs is hampered by geographical features that create access challenges and a low degree of state penetration. Other challenges include over centralisation of decision making in the capitals and uneven access to services and economic opportunities.[44] The governance challenges negatively affect growth and development, many of which are root causes or a direct consequence of corruption. The vulnerability of PICs to these challenges is not uniform, and depends on such issues as the natural resources that PICs utilize, their administrative histories, remoteness, geographical configuration, post-conflict context, local and 'over time' integrated traditions and the degree of outreach that State structures have across their territories. Yet, the specificity of the Pacific region, as an overall geo-political entity, is strong enough to capture a comprehensive set of commonalties in terms of the governance factors affecting corruption.[45]

Several factors create fertile ground for corruption in the PICs. The geography of scattered islands makes the supervision of local and provincial government particularly costly and challenging. This has resulted in weak central institutions and a low degree of state penetration, making the state unable to exercise effective control and oversight over its whole country. This translates into weak or non-existent public service provision, poor quality of regulatory/compliance functions, such as those in the fisheries and forestry sectors, and weak central oversight functions, in other words parliaments, ombudsmen and audit institutions.

The concept of a centralised bureaucratic state has been introduced relatively recently in the region. Political institutions have not yet been fully integrated with the existing strong cultural and tribal traditions. Official duties may contradict traditional commitments to family and tribal units, and there are poor links between indigenous and "imported" political systems.[46] For example, in Solomon Islands, the concept of democracy is very new and it has proven a difficult marriage with customary systems. Some consider Solomon Islands not so much a failed state but an emerging state, where people's affiliations are not yet with the nation, but rather with their ethnic group and associated communities. As a result, there is a predisposition to favour people from the same tribal or language group in awarding contracts, appointments and scholarships.

Political participation is hampered by a general lack of experience with the democratic process. A low electoral ratio of parliamentarians to citizens makes it more likely for politicians to know their constituents and facilitate the development of corrupt networks. The small size is also likely to fuel the personalisation of decision making and various forms of nepotism, cronyism and clientism. The "wantok" system means that people break the rules due to family and tribal relationships. Amongst the PICs are some of the poorest and most deprived nations in the world; if the basic services needed cannot be provided, then poverty is more fundamentally felt and people have very few options and resilience strategies, which contributes to compounding corruption and motivate people to participate in corrupt behaviour.

Some PICs are resource rich, others less so. Those rich in resources can face specific governance challenges associated with the management of those resources. The timber industry has been reported to be a particular source of corruption in Solomon Islands and Papua New Guinea, and similarly for mining in Papua New Guinea. Some also argue that large-scale corruption in the PICs is perpetrated by outside interests, such as the influence of international logging and mining companies in the Solomon Islands, as is the political power that foreign companies operating outside the bound of states and societal rules can exert on small countries.[47]

Aid dependency and low absorption capacity can create specific corruption challenges in the region, contributing to a destabilising impact on regular domestic accountability structures when aid is disbursed outside country systems.

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[44] Allen + Clarke (2017). *Evaluation of New Zealand's Development Cooperation in Tuvalu.*

[45] UNODC. *UN Pacific Regional Anti-Corruption Project. Project document.*

[46] U4 Expert (2017). *Solomon Islands: Overview of corruption and anti-corruption*

[47] Ibid.

5.1.3 Foreign interests

China's expanding influence is complicating strategic calculations throughout the Asia-Pacific region. Small states are dependent on maintaining high levels of trade with China to secure their prosperity. They are also vulnerable to offers of aid and loans with less overt ties compared to traditional donors. As such, they are reluctant to criticise or take actions that China may find objectionable. This creates a dilemma regarding how small states can protect their national interests, while China's influence is growing.

New Zealand illustrates this dynamic. It watches China extend its influence into the microstates of the South Pacific, a region where New Zealand (and Australia) have long enjoyed a position of prominent influence.[48] New Zealand's renewed Pacific response is in part a reaction to the dilemma facing small states in the region. As China's power grows, it is leading Beijing to extend its influence into every corner of the wider Asia-Pacific region. In the South Pacific, this influence is being secured through aid, loans (creating debt South Pacific states may be unable to pay off) and building projects.[49]

Australia has similar grounds to deepen its Pacific engagement. Evaluation participants representing DFAT, whether at in-country posts or at central level, mention the Australia-China dichotomy as prevalent throughout most of the Pacific. Australia's 2017 Foreign Policy White Paper and the recent Pacific Step-Up announcement reiterates the importance of supporting a stable and prosperous Indo-Pacific; to keep Australia safe, secure and free, and tackling transnational organised crime, including corruption, and; stepping up support for the Pacific and Timor-Leste, with an additional AUD 3 billion for the Pacific and AUD 2 billion for an infrastructure facility. The new approach recognises that more ambitious engagement by Australia, including helping to integrate Pacific countries into the Australian and New Zealand economies and their security institutions, is essential to the long-term stability and economic prospects of the Pacific, and that Australia's partnership with New Zealand will be central to advancing this agenda.

For DFAT, corruption and resilience is of high priority in the Pacific. Countries with high levels of corruption are more susceptible to foreign influence, and corruption negatively impacts on economic resilience. In terms of foreign direct investments, the IMF points out that this is not only a transfer of ownership from domestic to foreign residents but also a mechanism that makes it possible for foreign investors to exercise management and control over host country firms, whether public or private—that is, it is a governance mechanism. The transfer of control may not always benefit the host country because of the circumstances under which it occurs, problems of adverse selection, or excessive leverage.[50] The integrity institutions in the Pacific must in response be vastly improved, and support to appropriate legislative framework extended to enable a rules based order in the region.

Due to the geographical location and proximity to Latin America and weak governance, enforcement and border monitoring mechanisms, money laundering and organised crime are further threats to a rules based economy and society in the Pacific. The relationship between transborder crime and corruption is obvious. Efforts at improving governance including anti-corruption mechanisms are likely to have a positive impact on these issues, and, conversely, transborder crime is likely to be further manifested if anti-corruption mechanisms are not strengthened. On the other hand, further weakening of governance mechanisms will encourage and facilitate them. The United Nations Office on Drugs and Crime is therefore working with strengthening the integrity systems in the Pacific.

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[48] New Zealand is to spend an additional NZ$714 million over four years on international aid, the majority to South Pacific nations.

[49] https://www.nbr.co.nz/article/new-zealands-pacific-reset-strategic-anxieties-about-rising-china-ck-216150

[50] International Monetary Fund. *Finance and Development*. 2001, Volume 38, Number 2

5.2 Transparency International in the Pacific before and today

5.2.1 Before 2016

Since 2005 the work of TI's Pacific chapters was supported by the New Zealand Government, through the provision of annual core and project funding under a Pacific Support Programme implemented by TI New Zealand. The Pacific Support Programme was an integral part of the TI Asia Pacific Strategy from 2008.

Simultaneously, TI's Asia Pacific Department implemented the Institutional Support Programme (ISP), to enhance the operational and advocacy capacity of national chapters across Asia Pacific. This programme was subsequently expanded to further support Asia Pacific chapters through more systematic assistance on capacity development, and with limited core funding, through the TI Asia Pacific Institutional and Network Strengthening Programme (INSP). All Asia Pacific chapters, including the four Pacific chapters – Papua New Guinea, Fiji, Solomon Islands and Vanuatu - as well as TI Australia and TI New Zealand, were involved in the INSP.

The Pacific Support Programme was re-designed into the Pacific Institutional and Network Strengthening Programme (PINSP) in 2009-2010, and the Programme continued to offer support to Pacific chapters that was complimentary to the INSP, allowing increased alignment, efficiency, and cost sharing across programmes, and providing more in-depth support to Pacific chapters. In particular, the INSP, PINSP, and the ALAC programmes all had a significant focus on providing regular communication with the region and the wider movement, identifying expertise, providing advice on management and governance structures, strategic planning, and other areas of capacity development.

The Pacific chapters recognised there would be benefit in working more closely together to share learning experiences and to develop a strong network of organisations focused on addressing corruption issues across the Pacific region. In addition to organisational development, core funding support, civil education support, major elements of the PINSP were therefore regional activities and management including cross-chapter visits and speakers tours.

Funding through the PINSP, the ALAC programme and additional financial support from TI's Asia Pacific Department made up a significant portion of the total funding received by all four Pacific chapters. With the exception of TI Papua New Guinea, all other Pacific chapters faced difficulties in identifying and securing alternate funding.[51]

Papua New Guinea, Fiji, Solomon Islands and Vanuatu were the four functioning Pacific NCs with comprehensive programmes. To illustrate the work that was done prior to the current AP Programme period by the Pacific NCs, the programmes and operations of Transparency Solomon Islands and TI Vanuatu are briefly outlined below.

Transparency Solomon Islands was started in 2003, born out of a budding anti-corruption movement. During the period 2011 – 2015, the organisation had as many as eight employees, of which five were paid through core funding from New Zealand, and three with project funds. It had three ALAC staff and this meant that it was possible for the organisation to undertake time-consuming travel to the outer islands for advocacy and awareness raising activities, while maintaining an ALAC service in the office in the capital Honiara. The organisation also had a paid board chair, and travel expenses for the Pacific NCs to get together were paid for. This was considered very important by the NCs, i.e. the ability to get together to collaborate regionally.

TI Vanuatu was established in 2001. It was a very active chapter with 25 corporate members and 15 individual members. Up until 2014-2015, when the organisation had proper core funding, it had nearly 20 paid staff. It had demonstrated its ability to manage large complex projects and maintain a regular newspaper commentary on transparency and corruption issues in Vanuatu. The chapter has placed strong focus on improving access to information, and their activities included conducting media training with local journalists and a major civic awareness project.

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[51] Transparency International (2011). *Pacific Institutional and Networking Strengthening Programme: Funding proposal.*

TI Vanuatu opened its ALAC in April 2009 and received just under one hundred complaints in its first year of operation. The chapter used the ALAC as a tool to increase outreach to rural communities, with staff conducting trips to provide legal assistance to two of the outer islands. The ALAC was considered the organisation's flagship. Apart from the ALAC, it had a youth section, a civic education programme and a proper administration. The youth section was particularly strong.

In the beginning of TI Vanuatu's operations, the general population did not understand what corruption was, according to a Vanuatu stakeholder. By 2012, the awareness had been substantially raised. The organisation was present and well recognised throughout most of the country, including on the main outer islands.

During the previous programme, TI-S had tried to support the Pacific chapters to fundraise, including through a new proposal to MFAT in 2015. Simultaneously, the Pacific chapters had internal challenges, and TI-S was trying assist them in addressing issues related to governance and financial management, essential to access funding. This was the case for **TI Fiji**, and TI-S has commented that attempts to put in place more robust structures including recruitment processes did not work. As a result the chapter was not able to reach the accreditation requirement.

In 2015, MFAT stopped the funding for the Pacific chapters. This was due to changes in donor priorities, which favoured results-orientation and therefore project funding as opposed to core funding. Being core funding, the effect of the termination of the support had very dramatic impacts on all the Pacific chapters. Transparency Solomon Islands and TI Vanuatu were not able to generate the same level of results after this point. After the funding cut, TI Vanuatu's the key staff left, along with most board members.

These developments coincided with substantial governance and organisational changes at TI-S, with staffing implications. For a period several TI-S focal areas did not get intended attention, the ACA initiative was one, mentioned in section 4.2.3, the Pacific support another. Helping chapters to find alternative core funding was in the beginning of this period not easy, as the donor trend at the time was oriented towards investments that could demonstrate clear and tangible results, whereas the Pacific chapters needed general capacity support and ability to engage in general advocacy processes. In addition, very few donors available in the Pacific.

5.2.2 Current situation

At a **sub-regional level**, there are no other relevant CSOs that work in the anti-corruption field. In terms of international and/or multilateral organisations, UNDP and EU fund regional and national initiatives in governance and election monitoring, and the Pacific Islands Forum (PIF) has a strategy on governance (refer to section 5.3.4 for more on PIF), but there are no other organisations aside from TI that are in a position to implement anti-corruption work on their own, without first partnering with TI.

At country level, Transparency Solomon Islands and TI Vanuatu are still active and have a voice in their respective countries. The drive has come from inside, from people in the countries who believe that TI is essential in the fight against corruption in those countries. TI Australia and New Zealand are considered to have been supportive and helpful to keep the Pacific chapters going after the core funding cuts in 2015, through peer-to-peer support and contributing funds for travel to enable sub-regional meetings.

Transparency Solomon Islands currently has five paid staff, all of whom are paid through UNDP, but indirectly from DFAT bilaterally at post in Honiara. The organisation has two focus areas with its work: 1) Target decision makers; and 2) Support people's activism.

The ALAC provides the same services as before the cut of the core funding, but with only a one-person operation, compared to three in the previous programme. There is thus no spare capacity and it is less feasible to travel to the outer islands to participate in ALAC relevant activities in order to reach more people and contribute to raising awareness throughout the country. The dispersed nature and inherent topography of the islands, combined with extremely scarce ferry services, means that if the ALAC staff member travels outside Honiara, the office is left vacant of ALAC services for a relatively long period of time.

With one or two more legal staff, the chapter believes it would be able to both recommend court cases as well as better provide legal advice to citizens. The only option for citizens aside from seeking legal advice and aid from the organisation is to get the same service from the Public Prosecutor, which unfortunately is poorly resourced, and is therefore not able to provide adequate and timely assistance.

Yet, despite this context of scarce resources and funds, Transparency Solomon Islands has proven to be very effective, with one of its recent success stories considered to be the passing of the Anti-Corruption Bill in 2018. It gets weekly, if not daily, media coverage of corruption issues, including regular cartoons messaging a particular stance in the paper. It appears to be very visible, at least in the centre, in Honiara and its island of Guadalcanal. The organisation keeps track of the volumes of requests for its services. A ledger is kept, noting how many people come into the office to ask for help and advice. Four years ago, no one spoke up against corruption. Awareness is now considered by all stakeholders consulted to be higher, including in rural areas/outer islands.

The chapter does outreach work regarding the Constituency Development Funds, which are the decentralised funds MPs receive tax exempt to invest in their respective constituencies. In the provinces and the outer islands, the organisation shares information about how this system works, where this a high demand for more knowledge (all printed material that the organisation brings to these activities and meetings is taken). Most of the time, the population does not see any sign of these funds in their provinces, often they are not even aware of the funds existence. Transparency Solomon Islands' work on lobbying politicians on the situation contributed to the Vice President in September calling on MPs to declare and acquit these.

Stakeholders consulted in Solomon Islands were unanimous on the work and effectiveness of the organisation:

> "TSI is vocal and effective. It is effective in terms of what they can achieve with the resources they have".

> "Top-down change doesn't work here, politicians are not going to change. We therefore need to be working with the communities so they ask more of the politicians".

Development partners come to Transparency Solomon Islands to ask for updates on situation in the country, including the IMF. It has therefore become an authority on the issue, a positive reflection on the chapter but with influence comes responsibility.

According to the NC's staff, most of its work cannot be projectised, such as dialogue with the Government and on-going communication with the citizens. The view is that it is not possible, nor relevant to put a target on this kinds of lobbying and policy dialogue activities, and that "if you try you fail from the start". Transparency Solomon Islands has been able to attract funds for projects, such as for pre-election civic education work from UNDP/DFAT. However, it is struggling as an organisation due to lack of underlying core funds. Any corporate, institutional or overhead costs and tasks are thus a detraction from the sole project work paid for, which is a strained situation to be in.

TI Vanuatu is currently only in Port Vila, the capital, as it does not have the capacity to go the outer islands. Before, with a bigger budget and more staff, the organisation was able to run consistent outreach activities in the remote areas. Without funds, the ALAC is not operational at the moment and there is no more youth programme. There are constant requests from youth for this to re-open.

TI Vanuatu currently works on citizens' budget together with the Office of the Prime Minister, and on the implementation of the Right to Information Act (passed with a lot of input from TI Vanuatu in 2017) with the Minister of Finance. The Utility Regulatory Authority (URA), approached TI Vanuatu to be the focal point for complaints from the public on billing and service delivery, an approach which was a result of the successes with the RTI work.

The four current staff members are paid with project funds from the URA and from the Citizen's Budget. The Executive Director is not paid.

It is a challenge for the organisation to focus on external activities and programming as there is always a shortage of new funds. In essence, since 2015, TI Vanuatu has been operating in survival mode, without funds. And without funding, it is very difficult to do basic audits and other internal processes, which makes it difficult to qualify for AP Programme grants, or comply with governance requirements for other purposes such as accreditation. The upside to this precarious funding situation is that the organisation has had to rigorously re-assess its operating methods. Previously, the organisation worked in silos, whereas now, with less resources, it has had to create more coalitions and work in partnerships.

Today, with more access to and use of social media, a greater proportion of the Vanuatu population are able to take on the fight against corruption themselves. For TI Vanuatu, this necessitates reassessing its own optimal place in this arena. In Port Vila, it considers that there is less advocacy to be done, but in the outer islands there is a clear need. Even though the outer islands have relatively good internet connectivity and social media, traditional advocacy and foot work is still more relevant there.

5.3 A future approach

5.3.1 Needs and Relevance

Considering the high risks and commonalities of issues across the PICs, as described in section 5.1.2 above, there is a need for an intensified *regional* approach and partnership for anti-corruption in the Pacific, the South-Pacific in particular.

In key economic sectors such as fish, mining, timber and shipping, corruption is already highly prevalent, but there are few structures in place by way of oversight. Given the smallness of most Pacific states, this results in a culture of 'politics of favour' by big corporations. To this effect, two provincial governments in Solomon Islands have for example been backed by loggers. A newer and growing issue is a geopolitical struggle for political influence in the region. It has always existed to some extent but is now becoming more overt and taking new forms. As discussed in 5.1.3, China is taking a bigger role and in recent years its interest and willingness to support infrastructure projects suggests a more strategic approach. As PICs are confronted with multiple opportunities and options for assistance, particularly in infrastructure development, it will be increasingly important to monitor contracts, concessions and permits given out by governments at the government and SOE level, and to have transparent procurement processes.

Solomon Islands is used as an example in this section at the *country level*. The country is a relatively young nation, only 50 years have passed since its independence from colonial rule. The concepts of modern Western democratic forms of government and governance are therefore still relatively new and only shallowly rooted and sitting alongside many traditional social systems. For example, the idea of criticising the government is not looked well upon in a culture where the critique of elders is still a taboo in many institutions, organisations and social contexts. Therefore, the idea of a watchdog like TI is rather new, but for the very same reason extremely important.

All stakeholders external to Transparency Solomon Islands consulted in-country comment how essential the organisation is in the fight against corruption in the country, and that there is no other institution that challenges the government on these issues. No other independent body hold the government accountable, and bilateral donors are constrained by the need to maintain a good working relationship with the government of the day, as such they are reluctant to address corruption concerns in the way that a CSO or a multilateral organisation may be able to. Transparency Solomon Islands is considered to be the only organisation able to raise awareness around people's rights to services and information, and it is considered to have a role towards both public and private sectors.

Several stakeholders consulted were of the view that, although Transparency Solomon Islands is doing a good job, with more funds it could do so much more, including going out regularly to the provinces, and to re-brand itself as a people's organisation, by virtue of having more time and resources for civic engagement activities and to foster a loyal and broad membership base. In addition, if more partnerships were created the reach could be much greater than the present situation. At present, because of the dispersed nature of the geography and population of the islands, a lot of communities in the Solomon Islands are never reached by CSOs and there is a demand for TI to do this instead, to raise awareness of people's rights to service delivery, and to information.

There is a stronger regional consciousness about fighting corruption in the Pacific today. Most PICs have signed up to the UN Convention Against Corruption (UNCAC) as well as participated in global conferences on anti-corruption in Small Island Developing States (SIDS). At the first edition of these conferences, in 2015, 17 SIDS expressed their concerns and challenges with respect to the implementation of UNCAC. It was recognised that in view of their smallness and constraints relating to human capacity, resources and accessibility, SIDS required specific anti-corruption reforms that were affordable, sustainable, and effective to prevent and combat

corruption. 20 SIDS delegates attended the second conference, in 2016, during which discussions focused on preventing corruption in the public procurement process[52]. As mentioned below in section 5.3.4, the PICs have supported Republic of Kiribati intention to host a regional anti-corruption conference in 2019, and the SIDS have agreed to joint efforts to tackle security concerns, including trans-national crime, in the region.

5.3.2 A model for Transparency International

TI-S and the Pacific chapters have over the past two years gradually progressed work on a Pacific strategy, with staffing and other resources allocated for this purpose. The strategy is now in draft and focuses on as a first priority supporting existing Pacific chapters and assessing how resources and be pooled and shared. Once this is done, the intention is to design a longer sub-regional programme and seek funding for it. A key part of this strategy is to recruit a Pacific resource person, to enhance support to the sub-regional chapters.

This evaluation confirmed that there is a general consensus from interviewees that the Pacific NCs need another model, as well as the ability to pool resources more. Much like the strategy proposed, both NCs and DFAT consider it important to have a sub-regional presence, such as the Pacific resource person mentioned above. For DFAT, this would be very helpful in order to stay abreast of the progress of TI's work, but also to develop more of a partnership approach with TI, in which TI can provide advice on pressing corruption issues, on regional themes as well as relating to different countries in the sub-region.

Evaluation participants further noted that it is important to not be confined to only work with the NCs that are in place in the Pacific at this particular point in time. It was thought that by virtue of having a regional presence, developments on the ground and initiatives would naturally unfold. This could for example mean initiating sub-regional engagement in PICs which currently do not have a TI NC, through collaboration with a regional body, such as the PIF (see more on PIF in the section below on partners), or through a local CSO. A regional approach to certain policy issues or investments would be highly relevant, considering that many corruption issues across the countries in the South Pacific are relatively uniform. TI could in this sense be more active in regional bodies and forums, to start the anti-corruption conversations there. The regional resource person would be able to coordinate the Pacific chapters regarding data on important regional issues.

The resource person would be able to assist in making regional trends analysis and coordination with regional partners, as well as capacity strengthen NCs in financial management, fundraising and reporting. In the case of, for example, the Solomon Islands chapter is a small operation with many demands on its time. Having this support would be big help for them.

In terms of the specifics of a re-energised Pacific model and programme, it is worthwhile noting what chapters considered working particularly well in the past. This included core capacity support and organisational development, civic education support, and the ability in working more closely together to share learning experiences and to develop a strong network of organisations focused on addressing corruption issues across the Pacific region, enabled through regional activities and management including cross-chapter visits and speakers tours.

5.3.3 Funding

One areas of weakness in the Pacific is limited sources of funding. The design of TI's AP Programme was done on the assumption that the individual NCs would have core funding and that AP programme funding would support external projects on top of this. In Asia, the TI AP Programme is only one small part amongst a diverse range of other funding (5-10 percent of total). In the Pacific, DFAT essentially provides the only funding, one key differences between Asia and the Pacific. The viability of other donors or Pacific private sector is very small in the Pacific. The conclusion of this evaluation is that the Pacific NCs are able to attract funding for specific projects and activities with relative ease; what they need most is assistance through core funding.

The expectation that the small Pacific Islands NCs should fundraise for bilateral core funding themselves is unrealistic. There is sensitivity in who donors fund and with maintaining a good working relationship with the governments, something which is particular to the Pacific, with very small populations and where being effective is dependent on maintaining good personal relationships, for citizens, donors and businesses alike.

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[52] https://www.icac.mu/2nd-global-conference-anti-corruption-reforms/

Any donor, bilateral in particular, needs to be on a good footing with the host government. For example, it was not possible for Australia to directly fund TSI for the civic education it is currently doing ahead of the country's elections. The bilateral DFAT funds were instead channelled via UNDP.

There is a negligible domestic private sector to raise money from. Even if this was an option, for this to happen there first and foremost needs to be a stable organisation and a stable (core) funding base. It will then be possible to go to the private sector for funding for specific, targeted professional initiatives and projects. Without the stability of core funding, it may be too risky for corporations to get involved.

Because of the variability of funding, in e.g. Vanuatu, the NC has not been able to have consistency in its outreach activities. For Solomon Islands, external stakeholders consulted commented that they were concerned about the organisation's sustainability. Both NCs are somewhat stuck by this situation, as with no funds and spare capacity, they are unable to find time and resources to apply for funds properly and to present due audits and other requirements. At the same time, being so lean financially and in terms of human resource, they are not always able to spend a grant given to them, which is the case for Transparency Solomon Islands and the grant it receives from UNDP - - it takes time to manage a donor.

Given the challenges for Pacific chapters to attract core funding in-country, it is relevant to consider that for a future AP Programme period, the budget be split in into two categories: one for project funds, such as is the case at the moment, and one for core funds.

The eligibility for core funds need to be carefully considered, however. It should only be available for small, vulnerable NCs, operating in very resource scarce context, but who can demonstrate that their work is not and cannot be for the next period replicated by other organisations. Such a funding formula could consist of at least the following two criteria:

1. Effectiveness of work and likelihood of achieving impact despite political constraints
2. Relative country income level, donor context and likelihood of attracting other core funds

To determine the second criteria, UNDP's Multidimensional Poverty Index (MPI)[53] could be used. It identifies multiple categories of deprivation -- such as in education, health and standard of living -- and not just per capita income.

In terms of which donors would contribute to this programme, with a two-layered funding structure, it is the hope that DFAT will continue funding the next phase the AP Programme. In addition, DFAT and TI-S should consider engaging in discussions with other donors, to contribute to a basket of pooled funding for the programme. The relevant bilateral donor aside from Australia is New Zealand. The New Zealand Aid Programme for the three years starting 1 July 2018 will be substantially bigger and with re-oriented priorities and objectives. It will continue to have a strong focus on the Pacific – in line with New Zealand's Pacific reset. New Zealand currently spends around 60 percent of its official development assistance on the Pacific Islands region. One of the three pillars for its new additional funding is to allow the New Zealand Aid Programme to:

> *"Have an increased focus on sectors important for the promotion of our values – including good governance and transparency, human rights, women's political and economic empowerment, and youth."[54]*

It could also be relevant to discuss with UNDP and the EU regional office in Fiji, to explore if there is an interest in co-funding this initiative, in particular if a stronger sub-regional approach to shared programmes and activities take form. Other countries have also recently increased their contribution to the region, and look to disperse this through multilateral or regional partners due to not having their own networks, such as some European countries.

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[53] http://hdr.undp.org/en/2018-MPI
[54] www.mfat.govt.nz/en/aid-and-development/our-work-in-the-pacific/

5.3.4 Regional advocacy and potential partners

One relevant actor to reach out to in an energised Pacific TI movement is PIF. The Pacific Island Forum Leaders has articulated the importance of good governance for the region, and PIF's governance priorities in the Pacific include bolstering key governance and accountability institutions to enhance the transparency of political and economic processes, strengthening oversight mechanisms to ensure the effective management of the region's natural, human and financial resources, and protecting fundamental human rights. The core activities include observance of elections, the Forum Compact, legal advice and legislative drafting support, and promoting the Forum Principles of Good Leadership and Accountability.

A collaboration could be used as a mechanism for coordinating and facilitating an enlarged Pacific sub-regional response to the corruption challenges in the region. Working with Non-State Actors (NSAs) is an important part of the PIF Secretariat approach to realise the vision of Pacific Island Leaders detailed in the Framework for Pacific Regionalism. In partnership with the European Union, the Forum Secretariat manages the *"Strengthening Non-State Actors Engagement in Regional Policy Development and Implementation Programme"* which aims to build the capacity and ability of Non-State Actors (NSAs) to participate effectively in regional policy making processes and implementation[55]. Recently, PIF committed to an Anti-Corruption Forum, in that Kiribati would host a regional meeting on anticorruption in 2019. If the TI Pacific strategy is in place, and the mentioned resource person has commenced, this could be a relevant and timely opportunity to leverage off.

The Pacific is the Forum Fisheries Agency (FFA), with its seat in Solomon Islands, is another regional thematic bodies, representing one of the main economic sector in. The relevance of establishing a relationship for coordinating anti-corruption and integrity processes within this sector is strong. Like forests, fish are one of the few high value resources available to many PICs, sometime the only such resource. The tuna resource in the South Western Pacific is the biggest and most valuable in the world. Because of the evolution of the fishing sector to one where PICs largely receive royalties from foreign flagged vessels fishing in their waters, controlled by a *melange* of overlapping bilateral and regional fishing agreements, there is much scope for corruption, and much evidence it is already occurring. This impacts on government revenues and on the long term sustainability of the fishing resource, both for foreign and local fishers. It also has overflow relationships with other regional crime such as people smuggling, money laundering and organised crime. This is an area where TI could potentially add more value, working with regional bodies such as the FFA, regional fisheries management bodies, UN, and donor countries like Australia and NZ, who take an active interest in regional fishing bodies.

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[55] www.forumsec.org/

5.4 Impact Story

<u>Failure of service delivery in the Malaita Outer Islands, Solomon Islands</u>

Constituency Development Funds

Public funds directly allocated to elected officials for use in their electorates for infrastructure projects or other services are referred to as constituency development funds (CDFs). The degree to which these funds are controlled by parliamentarians, and the degree to which local citizens participate in them, vary from country to country. The defining feature of CDFs is that MPs have substantial control over the distribution and application of the funds, with previous research indicating that CDFs can have a negative impact on accountability and service delivery.[56]

In Solomon Islands, CDFs make up around one-third of the development budget, or between 10 and 15 percent of total budget outlays. CDF expenditure in Solomon Islands have risen sharply for each MP over the last 10 years. There is currently no legislation in force requiring common or minimum standards for CDF governance and oversight,[57] and there is no formal acquittal process for the funds.

State of service delivery in the Malaita Outer Islands

Malaita Outer Islands are a few small atoll islands to the east of Malaita Islands, and to the north of the main island Guadalcanal. The total population of the Malaita Outer Islands is less than 3,000 people. It is the biggest lagoon in the world, with the most remote islands, Lord Howe, being severely threatened by sea level rise. The inter-island shipping service does not reach the atolls. A separate ship goes to there every three months.

An equivalent to 3.75 million USD has for the last of the eight years been disbursed by the CDF mechanism to the constituencies, but the islands have according to Transparency Solomon Islands not seen much evidence of these funds. The country's two smallest constituencies are found here, and they are allocated the same amount of funds as larger constituencies. Considering this pro rata situation, they should have been significantly better serviced.

According to Transparency Solomon Islands, the MP for the Malaita Outer Islands was allocated a so called shipping grant, to buy a ship that would enable better inter-island service to use for transporting goods and people. However, one of the vessels the MP bought was of very poor quality and sank outside Fiji. The purchase had been substandard, and the interpretation is that the MP just wanted to demonstrate that funds had been spent, but without genuine intent. When Transparency Solomon Islands went to the islands, the people asked what had happened to their ship and when it would arrive, not being aware of what had actually happened.

On Luaniua atoll, the schools' premises are in a grim state. The early childhood education centre has been closed down due to poor facilities. The head teacher of the Luaniua School attributed the current situation to misuse of allocated funds received from school grants. He believes that this has contributed to poor academic performance of the islands' students who entered primary levels as they have not had the right foundational early childhood education years.[58] The primary and secondary schools in turn are pleading for authorities to have their sanitation facilities replaced, which are in a dire state as well. The problem has existed since the building's establishment but has never been addressed. As a result, students miss classes as they need to go home or elsewhere to use toilets, and often not returning to school afterwards. Adding to this problem are two school water tanks that were not even properly installed.[59]

The people of low lying island Lord Howe are struggling to adapt to the effects and impact of climate change, such as sea level rise and salt water intrusion. Saltwater intrusion is having effects on agriculture sectors, local crops for consumption is now scarce and commercial businesses are not making profits anymore. As the sea level continues to rise, the island and its people are under threat. According to Island Chief Peter Kalai in an

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[56] International Budget Partnership (2010). *What is wrong with the Constituency Development Funds?* Budget Brief No. 10
[57] Department of Pacific Affairs. In-Brief 2018/4
[58] The Island Sun, 11 September 2018, p. 24
[59] The Island Sun, 11 September, 2018, p. 3

interview in The Island Sun, the situation is getting worse and that it will be necessary to relocate the coastal settlers.[60]

Aside from the specific projects that could fall under the CDF, Transparency Solomon Islands hold that the state of general deprivation in Malaita Outer Islands is acutely felt in terms of rule of law. There is no police and rape is prevalent, including of under-aged girls. People's basic human rights are violated in several respects, including access to information.

Transparency Solomon Island's outreach work in Outer Malaita Islands

As part of Transparency Solomon Islands' grant from UNDP for civic awareness ahead of the National General Elections in March 2019, the organisation has been to 41 constituencies to provide advocacy on good governance, by using the CDF as an entry point. One of these were the Outer Malaita Islands, the organisation was invited to conduct awareness at Luaniua and Pelau. This was very well received as the islands rarely see any other civil society organisations or donors visiting on account of being so remote.

On the islands, many had expressed their frustration to Transparency Solomon Islands when they realised that all constituents are equally entitled to benefit from the CDF, and that all constituents are potential recipients and the CDF is in place to develop the constituency and improve people's livelihood, without discrimination. Some quotes from villagers were:

> *"Many of us constituents within Lord Howe did not taste and feel the Constituency Development Fund"*

> *"What we see and understand is that only those closer to the MP, some relatives, voters and the CDO are benefitting from the CDF meant for all constituents."*

As the organisation went on this occasion, several newspapers followed. This led to significant publicity in the main daily newspapers.

Shortly after the visit, and after Transparency Solomon Islands' continued lobbying of MPs to make the CDF acquittal public, the Vice President called on MPs to declare and acquit the funds. This is promising and a great step towards enhanced accountability and more transparent practices of the CDF.

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[60] The Island Sun, 11 September 2018, p. 9

5.5 Conclusions and lessons learnt for the Pacific

The Pacific is in need of a strong anti-corruption voice. As poor, developing countries with high rates of poverty, and characterised by weak governments and institutions, it is not surprising that in general corruption is already endemic in most PICs. Structural constraints of the region means that on the one hand the PICs are extremely dependent on foreign investments and aid, but have weak integrity systems to ensure a resilient state bureaucracy to properly and transparently manage outside influence and external funds. Services and contracts are built on relationships, as such few actors speak up, and no one but TI is at this stage able to fill the role as a watchdog. The existence of some valuable resources such as forestry, fisheries and minerals in some PICs, provides additional incentives and pull factors for corrupt behaviour. Geopolitical factors also play a role.

TI in the past had quite large anti-corruption programmes in PNG, Solomon Islands, Fiji and Vanuatu, with different workstreams. The chapters celebrated the ability through the previous funding to be able to come together on a sub-regional basis, to share experience and learn from other chapters. After a reduction of core funding there were dramatic cuts in capacity. While the programme in PNG is fully integrated into the AP Programme, with different anti-corruption projects in outreach and accountability, and in policy and institutional engagements, the other three chapters are substantially reduced in size and capacity. While Solomon Islands still manages to do very effective work with very scarce resources, partners and CSOs are asking for the services from the past in Solomon Islands and in particular Vanuatu, which had even more cutbacks than Transparency Solomon Islands in relative terms.

To create a strong anti-corruption voice in the Pacific, it is necessary to put in place mechanisms that will facilitate and support the embedding of this stronger voice. The mechanisms include a stronger regional presence, a different funding formula and attempt at pooled funding.

By regional presence is meant that TI-S funds a person that will be located in the Pacific region and serve as a hub for the chapters there, and for other future local country contacts. This is in line with TI-S draft Pacific strategy and would mean enhancing capacity support to the Pacific chapters, such as through proposal writing, financial and project management capability strengthening, accreditation procedures and regional representation where necessary. TI-S is already in the process of identifying and recruiting a person for this role.

The second mechanism required is a different funding formula, and this has been discussed previously in this report (section 4.5 on sustainability). This is on account of the difficult funding context in the Pacific, where there is sensitivity in who donors fund and with maintaining a good working relationship with the governments, on account of very small populations. Being effective is dependent on maintaining good personal relationships, and donors, bilateral in particular, needs to be on a good footing with the host government. Given this, it is relevant to consider that for a future AP Programme period, the budget be split in into two categories: one for project funds, such as is the case at the moment, and one for core funds.

The core fund category need to be aimed exclusively at small, vulnerable NCs, operating in very resource scarce context, but who can demonstrate that their work is not and cannot be for the next period replicated by other organisations and that it is likely to have impact. In addition, with a two-layered funding structure, it is the hope that DFAT will continue funding the next phase of the AP Programme, and that in addition, DFAT and TI-S could consider engaging in discussions with other donors, to contribute to a basket of pooled funding for the programme.

An enhanced TI presence in the Pacific should aim at working at both regional and national levels. There a several cross-border anti-corruption themes and issues that are best addressed at regional level. There are several potential partners and recipients for a regional approach. The anti-corruption conference in Kiribati in 2019 could be a timely occasion for a launch of this intention.

6 RECOMMENDATIONS

The recommendations from this evaluation apply to both the current and any future programme. Initiating implementation of the recommendations within this programme period will set a solid foundation for a new programme.

Design and planning

> **For TI-S: Reflection on key strengths and alignment with TI's global strategic priorities and advocacy goals.** In light of the new advocacy global level priorities for the TI movement, assessment of the AP region's and the NCs' added value and key strengths, what this means for TI's global level initiatives, and how the key strengths can contribute to TI's proposed global advocacy strategy for dirty money and political integrity.

> **For TI-S and NCs: Stronger lateral connections between the goals**
> Making the logical horizontal links between goals more explicit would enable better management for shared outcomes and allow for efficient and innovative cross-goal programme solutions and ideas. At country level, there are several examples of where this is done. Smaller chapters with less resources sometimes do this better, as it is often cost effective and provides integrated solutions.

> **For TI-S: Review the Theory of Change, results framework, and terminology for target groups and beneficiaries.** The Theory of Change would benefit from a review of its causal chain and the change intended with different interventions. Stronger results-oriented indicators are necessary, which to the extent possible should be within what TI can control and to the extent possible avoid external dependencies. To be able to measure and determine TI's impact, it is essential to have a strong and deliberate beneficiary description in results and outcome statements, and as a consequence to be able to follow up the different intended results for target groups and beneficiaries.

Goal 1 – Enhanced Social Accountability

> **For TI-S: Commission a thematic impact assessment of Social Accountability**
> Social accountability is a big investment area. For accountability and learning it is important to properly capture the impact of the investments, and its contribution to people seeking redress, to community action, and to anti-corruption activism. This involves impact evaluation in all or several of the countries that contribute to this goal, with a focus on consulting beneficiaries. This should be done at the end of the current programme, either as a distinct part of the final evaluation or as a separate evaluation.

> **For NCs: Innovative approaches at design stage to reach more women and vulnerable groups**
> Methods such as gender responsive programming apply a gender lens at planning and design, which can lead to different approaches to activities and implementation. Some chapters do this well, and with a specific gender focus in mind they are able to reach more women, whom in turn have conveyed the message further, thereby having a multiplier effect.

> **For NCs: For better reach, more partnerships and more effective communications and campaign strategies.** Some chapters have established good partnerships that allow them to cover broader geographical areas. Other chapters need to do much more in this regard, to raise the awareness and contribute to more people taking action. Some chapters are demonstrating best practice in terms of using the best of modern technology and up to date campaign strategies, partnering with media outlets or entertainment industry to better capture people's attention and interest, as well as using mobile technology that allows people to report cases online. These examples could be adopted to improve the performance of other chapters hat are still mainly using print publications for this purpose.

Goal 2 – Strengthened Anti-Corruption Legislation

> Build on good experience made so far, but narrow the focus to countries where this goal is a strong priority, such as in the Pacific, and/or where this work is strongly required but where it is not possible

to get funding from other sources (as some NCs are involved in legislative work regardless of the AP Programme). Consider making lateral connections to the other goals more explicit, to enable the programme to be more integrated and improve management for shared outcomes.

Goal 3 – Strengthened Enforcement of Anti-Corruption Mechanism

Continue with the programme according to the current strategy, informed by the new Anti-Corruption Agency assessment in 2019, in order to see results towards the key outcome. Assess further how the tool can be used for non-willing ACAs. Consider how the anti-corruption enforcement work in the AP region can contribute to TI's global advocacy goals.

Goal 4 – Demonstrated Business Integrity

Determine whether there is sufficient capacity at both NCs and TI-S to continue with this goal and the feasibility for scaling up. To make a case to continue with the goal, finalise the regional work with developing an overarching strategy, leveraging off the different regional initiatives in place. This should include connections to the other programme goals, such as policy coherence for efficient and accountable business practices, and Rights to Information as part of accountable business practice. Establish how business integrity can contribute to TI's new global advocacy direction and how it can work in coalitions and regional partnerships for strengthened impact.

Funding – for TI-S

Develop a funding formula that would enable chapters that operate in a country context in which access to alternative core funding is very difficult. The formula should take into account the feasibility of accessing other core funding, and the demonstrated effectiveness and likelihood of achieving impact, despite funding problems.

Enabling Impact – for TI-S

Balance Enabling Impact tied to the change goals with general capacity strengthening support
Consider the right balance between Enabling Impact tied to the change goals and a stand-alone capacity strengthening component. This will also support weaker chapters to reach their potential by utilising this budget component better. Advice at the proposal concept stage can make a difference for chapters who currently have not budgeted for any, or very little, Enabling Impact funds.

Balance between standardised centrally driven capacity building and needs driven approaches
A programme-driven structured approach should be combined with a demand-driven responsive approach, to ensure there is a minimum standard of skills and capacities within all chapters.

Skills and capability matrix. TI-S to develop a skills and capability matrix of technical skills available at each chapters, for chapters to access when they need guidance and advice on particular issues and want to connect with other colleagues for peer-to-peer learning. The matrix should also include capacity needs development, in order for TI-S plan ahead and meet capacity strengthening demands.

Gender mainstreaming. AP Team to advocate for institutionalising gender mainstreaming at TI-S. It is recommended that this involves engaging an in-house gender expert, or an expert on a retainer consultancy basis. Apart from benefitting the TI movement as a whole, for the AP Programme it would mean a gender quality controller to provide technical expertise on gender mainstreaming. With or without this resource, contribute to developing a gender mainstreaming policy and operationalise it through training and capacity support.

Continued capacity strengthening in the use of the Impact Matrix. The matrix contains several essential elements on outcomes and impact logic. Ensuring more chapters understand the model and appreciate the value of it would enable chapters to raise their level of impact thinking. It would also enable TI-S to get more consistent qualitative data on impact.

Reporting. Consider moving to 6-monthly chapter reports and develop a change request and risk and issues reporting procedure for chapters to use instead, when budget and programme changes are necessary between the regular reporting intervals.

Recommendations pertaining to the Pacific

Finalise and operationalise the TI's draft Pacific strategy
This includes recruiting a Pacific resource person, to contribute to operationalising the strategy.

Regional and national approach. Focus on supporting existing TI chapters in the Pacific, as well as leveraging off regional opportunities. There is a strong need for an intensified regional approach and partnership for anti-corruption in the Pacific

Demonstrate relevance, entry points and coalitions
For a strong business case for the Pacific, demonstrate the critical role of TI in the region, the options for different entry points for the next 1-2 years, and feasible partnerships and coalitions.

Develop the core funding formula, recommended above.

A split funding approach (project/core funding), and pooled funding. A new AP Programme should primarily consist of project or activity funding, with a small portion for core funding for vulnerable chapters. Explore mechanisms to put in place to allow for other donors other than DFAT to contribute to this pool for the Pacific chapters.

Annex 1: List of organisations consulted

Berlin and remote consultations

Transparency International Secretariat
Australian Department of Foreign Affairs and Trade
New Zealand Ministry of Foreign Affairs and Trade

Transparency International Australia
Transparency International Nepal
Transparency International Vanuatu
Toward Transparency Vietnam

In field consultations

Papua New Guinea

Transparency International Papua New Guinea
Consultative Implementation and Monitoring Council
Department of National Planning and Monitoring
Department of Provincial and Local Government Affairs
Institute of National Affairs
New Zealand High Commission

Solomon Islands

Transparency Solomon Islands
Asian Development Bank
Australian High Commission
Media Association of Solomon Islands
New Zealand High Commission
Solomon Islands Chamber of Commerce and Industry
United Nations Development Programme

Cambodia

Transparency International Cambodia
Advocacy and Policy Institute
Australian Embassy
Cambodian Center for Independent Media
Embassy of Sweden
Embassy of the United States of America
Federation of Association for SMEs of Cambodia
Ministry of Interior
USAID

Sri Lanka

Transparency International Sri Lanka
Mount Lavina Residents Association
National Authority for the Protection of Victims of Crime and Witnesses
Right to Information Act Commission

Annex 2: List of documents consulted

Allen + Clarke	*Evaluation of New Zealand's Development Cooperation in Tuvalu,* 2017
Australian Department of Foreign Affairs and Trade	*Australian aid: promoting prosperity, reducing poverty, enhancing stability.* (Australian Government's Aid Policy). 2014
Australian Department of Foreign Affairs and Trade	*Partner Performance Assessment. Regional anti-corruption civil society programme: Effective and Accountable Governance for Sustainable Growth,* 2017
Australian Department of Foreign Affairs and Trade	*Partner Performance Assessment. Regional anti-corruption civil society programme: Effective and Accountable Governance for Sustainable Growth,* 2016
Australian Department of Foreign Affairs and Trade	*Aid Quality Check for Transparency International APD 2016-2019. 2016*
Australian Department of Foreign Affairs and Trade	*Aid Quality Check for Transparency International APD 2016-2019. 2017*
Australian Department of Foreign Affairs and Trade	*Effective Governance: Strategy for Australia's aid investments,* 2015
Department of Pacific Affairs	*In-Brief 2018/4*
DeveWorks	*Final evaluation of TI Asia Pacific Programme,* 2014
Ebner & Stolz	*Independent Auditors' Report on the Acquittal Statement for the Project Asia Pacific Regional Program: Effective and Accountable Governance for Sustainable Growth.1 January 2017 until 31 December 2017,* 2018
Ebner & Stolz	*Independent Auditors' Report on the Acquittal Statement for the Project Asia Pacific Regional Program: Effective and Accountable Governance for Sustainable Growth.1 January 2016 until 31 December 2016.* 2017
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International Monetary Fund	*Finance and Development, 2001, Volume 38, Number 2.*
Jon S.T. Quah	*Anti-Corruption Agencies in Asia Pacific Countries: An Evaluation of their Performance and Challenges.* 2017
OECD	*Convention on combating bribery of foreign public officials in international business transactions.* 2011
TI Bangladesh	*Anti-Corruption Agency Strengthening Initiative: Assessment of the Bangladesh Anti-Corruption Commission 2016*
TI NCs	*Quarterly reports for 2016-2018 and financial reporting from the following NCs:*
	TI Bangladesh
	TI Cambodia
	TI Indonesia
	TI Maldives
	TI Mongolia
	TI Nepal
	TI Pakistan

	TI Papua New Guinea *TI Sri Lanka* *Towards Transparency Vietnam*
Transparency International	*Transparency International Asia Pacific Programme Brief*
Transparency International	*Transparency International's Asia Pacific Regional Programme: Effective and Accountable Governance for Sustainable Growth. 2017 Annual Report*
Transparency International	*Transparency International's Asia Pacific Regional Programme: Effective and Accountable Governance for Sustainable Growth. 2018 Programme of Work*
Transparency International	*Transparency International's Asia Pacific Regional Programme: Effective and Accountable Governance for Sustainable Growth. 2017 Programme of Work*
Transparency International	*Strengthening Anti-Corruption Agencies in Asia Pacific.* 2017
Transparency International	*Business Principles for countering bribery*
Transparency International	*"Transparency International Asia Pacific Programme: Towards Effective Leadership & Reforms in the Fight Against Corruption", Funding proposal.* 2011
Transparency International	*"Transparency International's Asia Pacific Regional Programme: Effective and Accountable Governance for Sustainable Growth", Programme Document.* 2015
Transparency International	*Transparency International Strategy 2020*
Transparency International	*People and Corruption: Asia Pacific. Global Corruption Barometer 2017*
Transparency International	*Mapping of Social Accountability Activities: Asia Pacific Programme.* 2017
Transparency International	*Pacific Institutional and Networking Strengthening Programme: Funding proposal.* 2011
Transparency International	*Are we on the road to impact? Transparency International Monitoring Guide.* 2015
Transparency International	*Real Lives Real Stories: The Asia Pacific Region.* 2017
Transparency International Cambodia	*The 3-year work of Advocacy and Legal Advice Centre (ALAC): The Results*
U4 Anti-Corruption Resource Centre	*Solomon Islands: Overview of corruption and anti-corruption.* 2017
United Nations Office on Drugs and Crime	*UN Pacific Regional Anti-Corruption Project. Project document.* 2016
ASEAN CSR network	*The Integrity Pledge mission statement.* 2017
Chr. Michelsen Institute (CMI) & Norwegian Institute of International Affairs (NUPI)	*Research on corruption: a policy oriented survey.* 2000
	Jakarta Statement on Principles for Anti-Corruption Agencies. 2012