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Mid-term review of the project *Ending Impunity for Grand Corruption in the Western Balkans and Turkey*

(final report)

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TI Bosnia and Herzegovina
TI Serbia
TI Macedonia
KDI - TI Kosovo
TI Turkey
MANS, Montenegro
IDM, Albania (subcontracted partner)

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Abbreviations

CSO – Civil Society Organisation
DG NEAR – Directorate-General for Neighbourhood and Enlargement Negotiations
EC – European Commission
FoIA – Freedom of Information Act
GC – grand corruption
IDM – Institute for Democracy and Mediation, Albania
LFA – Log Frame Approach
MEL – monitoring, evaluation and learning
MEP – Member(s) of European Parliament
NIS - National Integrity System
TI – Transparency International
TI-S – Transparency International – Secretariat
TML – tailor-made law
WB – Western Balkans

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0. Executive Summary

This report presents the findings of the mid-term review of the project "Ending Impunity for Grand Corruption in the Western Balkans and Turkey", implemented by Transparency International Secretariat (TI-S) in Berlin, together with TI's National Chapters in Bosnia-Herzegovina (B-H), Serbia, Kosovo, Northern Macedonia and Turkey, and partner organisations – MANS, Montenegro and IDM, Albania. The mid-term review was carried out between March 9 and May 22, 2020.

This directly funded action is part of the European Commission's Instrument for Pre-Accession Assistance (IPA II) 2014-2020 - Multi-Country EU Integration Facility (Action Document IPA 2018/040-113.04/Mc/Eu Integration Facility-Eu Agencies).

The objectives of the mid-term review were to:

- Assess successes, challenges, and lessons learnt from the research phase and how successfully the project is moving from the research phase into advocacy;
- Assess and make recommendations for the revision of the theory of change, log-frame and timeframe of the project;
- Develop recommendations for project implementation in the next period;
- Assess the project as part of the larger long-term regional programme in the Western Balkans and Turkey and provide recommendations for the programmatic focus post-2020.

The review is grounded in international evaluation standards and ethical guidelines, and based on standard *OECD DAC Evaluation criteria* of relevance, effectiveness, efficiency and sustainability. The methodological approach was based on a thorough desk review of project documentation, which was the basis for drafting evaluation questions and data collection instruments, finalized in interaction with TI-S. The secondary sources of information were triangulated with data provided in semi-structured interviews and data from survey questionnaires focusing on project's internal coherence, distributed to all interviewees prior to the interviews.

The review found the project to be relevant in the context of TI's global strategy, as well as in the contexts of targeted countries, given the omnipresent impunity for high-level corruption, exacerbated in most countries with tailor-made laws that enable and sustain corruption.

In terms of project design, the challenges that the project has been facing during implementation are, on the one hand, the result of poorly worded two-levelled outcome statements, which are not well connected to the project's outputs and activities. Therefore, the reviewer recommended changes to the log-frame, with no impact on the project's overall purpose, hence, in line with Article 9.4. of the *General Conditions applicable to European Union-financed grant contracts for external actions.*

The second, more serious issue in the project design was the fact that this research-heavy project did not have a very clear definition of what it is researching exactly, but rather made that definition one of the project's outputs. Hence, the 'definition issue' accompanied by the lack of publicly available verified data are the main causes of delays in implementation. This negatively affected project efficiency, which was aggravated by the fact that the project did not have a coordinator in the period between February and August 2019.

Despite the many challenges, Chapters were able to utilize the data of their research either in interactions with decision-makers or by building partnerships with CSOs, media, academics, opposition politicians, as an investment to be rewarded in the advocacy phase. In TI-S, a rigorous review process of the cases submitted by Chapters is implemented, followed by libel- and fact-checking, ensuring the robustness of data for anyone who wishes to pursue the issue of high-level corruption and tailor-made laws in target countries.

Advocacy activities ahead of the project will have to be carefully reconsidered, taking into account the expected disinterest of media and the public in light of the COVID-19 crisis, as well as in light of lockdowns, preventing face-to-face gatherings. Additionally, the project still has to devise strategies on message development as well as to produce national and regional reports stemming from the research. In light of the amount of work ahead of them, and taking into account the COVID-19 pandemic, the reviewer recommends a three to six month long no-cost extension period, to enable the project to reach its targets and objectives.

In terms of efficiency in project management, the main issue was the gap in the position of project coordinator, which seriously affected overall project management. The delay in implementing project activities resulted in relatively high levels of underspending. The staffing and time-allocations would have been adequate had the project not struggled with the definition of grand corruption. Also, structurally, the project would have benefited from a more pronounced role and a higher time allocation for the MEL officer, to support monitoring data collection at the Chapter level, and support the project coordinator in overall project monitoring.

Prospects of sustainability are relatively strong, yet very contingent on investing maximal efforts both in Chapters and in TI-S, to speed up case reviews and fill the data-base, and well as on developing appropriate messages for different audiences, communicated through appropriate channels. This will require more creativity in light of the COVID-19 crisis and its immediate effects as well as the aftermath in relation to the inevitable economic crisis the world will be facing. DG NEAR and EU delegations are also expected to contribute to sustainability by means of its effective use of the project's outputs in its interactions with governments of the target countries.

1. Introduction

This report presents the findings of the mid-term review of the project "Ending Impunity for Grand Corruption in the Western Balkans and Turkey", implemented by Transparency International's Secretariat from Berlin (TI-S), together with TI's National Chapters in Bosnia-Herzegovina (B-H), Serbia, Kosovo, Northern Macedonia and Turkey, and partner organisations – MANS, Montenegro and IDM, Albania. The total value of the project is 1.111.109 EUR, of which 90% was directly awarded by DG NEAR. The implementation period for the project is 26 months (1 November 2018 – 31 December 2020), while the mid-term review was conducted in the 17th month of project implementation, between 9 March and 22 May 2020.

The action is part of the European Commission's Instrument for Pre-Accession Assistance (IPA II) 2014-2020 - Multi-Country EU Integration Facility (Action Document IPA 2018/040-113.04/Mc/Eu Integration Facility-Eu Agencies)[1], where TI was recognized for its unique expertise to "undertake/update the "National Integrity System" (NIS) in all IPA II beneficiaries and to develop a tracking mechanism to monitor their efforts to improve their performance addressing corruption challenges for the first phase. The information obtained through the project will allow annually comparing progress made by and between the enlargement jurisdictions in regard to addressing corruption threats, thereby helping the policymakers and implementers to take the necessary steps."[2] Hence, TI was awarded a direct grant for this action.

The outcomes (specific objectives) as stated in the log-frame for the action are:

1. To improve transparency and accountability of the judiciary by tackling impunity for grand corruption as an entry point to addressing state capture;
2. To improve democratic law-making by identifying tailor-made laws that establish and sustain state capture;
3. To ensure a better understanding of grand corruption and its effects by key stakeholders in the seven EU enlargement countries

The objectives of this rather complex mid-term review are as follows:

- Assess successes, challenges, and lessons learnt from the research phase and how successfully the project is moving from the research phase into advocacy;
- Assess and make recommendations for the revision of the theory of change, log-frame and timeframe of the project;
- Develop recommendations for project implementation in the next period;
- Assess the project as part of the larger long-term regional programme in the Western Balkans and Turkey and provide recommendations for the programmatic focus post-2020.

The approach to the mid-term review was participatory, and its primary goal is learning in order to facilitate successful project completion. However, its lessons learnt should also be taken forward in any future programming of similar interventions, by all stakeholders involved.

This brief introduction to the review is followed by the description of the methodology. Subsequent chapters relate to the assessments of relevance, effectiveness, efficiency and sustainability, followed by the conclusion, and lesson learnt and recommendations.

[1] https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/ipa_ii_2018_040-113.04_mc_eu_integration_facility-eu_agencies.pdf
[2] Ibid. p 13

2. Methodological approach

2.1. Evaluation criteria

The review is grounded in international evaluation standards and ethical guidelines, and based on standard *OECD DAC Evaluation criteria* of relevance, effectiveness, efficiency and sustainability.[3]

The assessment of **relevance** focused, on the one hand, on the extent to which the project is in line with the broader approaches to fighting corruption nationally and regionally, as well as how well it fits TI-S' and Chapters' strategic priorities. On the other hand, a more challenging assessment in respect to relevance was the one related to the project's internal coherence between the theory of change, i.e. the relationship between its activities, outputs and outcomes, as well as its underlying assumptions.

Effectiveness was assessed to the extent possible, given that this is a mid-term review, i.e. in terms of "prospects of" achieving objectives, rather than conclusively. It also identified factors contributing to achievement and/or risks for non-achievement of objectives.

The assessment of **efficiency** focused on allocation and effective use of resources, as well as an assessment of the quality of project management. Furthermore, it touched upon the quality of cooperation on project implementation overall, within TI-S, between TI-S and countries and between countries themselves. Finally, it examined what types of capacities are present and which need to be strengthened, in order to effectively and efficiently advocate in the next project phase.

In relation to **sustainability,** the review focused on identifying current or planned activities that might contribute to fulfilling this criterion by the end of the project implementation period.

2.2. Definition of evaluation questions, data collection methods and target groups

The methodological approach was based on a thorough desk review of project documentation provided to the consultant by TI-S, including:

- project proposal,
- project interim report,
- project budget,
- project financial interim report,
- log-frame (original and revised versions),
- report from the kick-off meeting, report from the regional meeting on research methodology to be applied (including data collection guidelines, original and revised legal definitions of grand corruption, with criteria for case selection),
- interim narrative reports of project partners from five countries (Turkey and Montenegro sent the reports after the mid-term review),
- project monitoring, evaluation and learning (MEL) framework (including the presentation on setting-up the MEL framework),
- TI Strategy 2020 – Together Against Corruption[4],
- TI Vision 2030 – Findings report,

[3] www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm
[4] Transparency International (2015). *Together Against Corruption:* Transparency International Strategy 2020 (www.transparency.org/whatwedo/publication/together_against_corruption)

- TI Impact Monitoring Approach[5],
- IPA II 2014-2020 Action Document - Multi-Country EU Integration Facility[6], and
- correspondence between project coordinator and DG NEAR's programme manager on interim narrative and financial reports,
- correspondence between project coordinator and Chapters in relation to expanding criteria for case selection,
- previous coordinator's document containing lessons learnt from developing this project and her project hand-over document.

The desk review was the basis for drafting evaluation questions[7] and data collection instruments that were finalised during a Skype conference call on 19 March 2020 between the consultant and the project coordinator, TI-S monitoring and evaluation coordinator and TI-S regional advisor for SEE. Given the very short time-frame for this review, as well as the fact that the project has not extensively engaged with external stakeholders so far, the sources of information for the review included:

1. **Secondary sources** – project related documentation (mentioned above);
2. **Primary sources –** TI-S staff implementing and supporting the project, TI chapters/partner organisations implementing the project, DG NEAR staff (grant-maker).

The data collection method for primary sources of included:

1. **survey questionnaires** focusing on project's internal coherence, distributed to all interviewees prior to the interviews.

Despite the fact that during the initial interview with the evaluator, the decision was made that primary data collection methods would be limited to in-depth semi-structured interviews, the desk review revealed a need to conduct a short survey as well. The survey was used to gain insights into evaluation participants' perceptions of the coherence between the project's outcomes, outputs, and activities as well as the feasibility of outcomes and targets as stated in the log-frame. This decision was based on the evaluator's opinion that project's internal coherence would be difficult for participants to assess during the interviews, and that this would seriously prolong the duration of the interviews, thus risking the assessment of other evaluation objectives. The purpose of the survey was to facilitate in fulfilling the evaluation objective: *Assess and make recommendations for the revision of the theory of change, logframe and timeframe of the project.*

2. **in-depth semi-structured interviews**, conducted via Skype, between 24-27 March 2020 – in total 11 interviews.[8]

Interviews lasted between 1 and 2 hours, depending on the interviewees' level of involvement in project implementation and their specific roles within. With the consent of interviewees, all interviews were audio-recorded in order to enable the highest quality of the interpretation of collected data. Confidentiality and protection of participants' identities represent one of the internationally agreed ethical standards in evaluations.[9] Therefore, the confidentiality of the entire process was explained to all participants. Interviews took place only after the participants agreed to their terms and conditions.

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[5] Caldeira, Rute and Daniela Werner (2015). *Are we on the Road to Impact:* Transparency International Monitoring Guide www.transparency.org/files/content/ouraccountability/2015_TIMonitoringGuide_EN.pdf
[6] https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/ipa_ii_2018_040-113.04_mc_eu_integration_facility-eu_agencies.pdf
[7] Appendix 1 to this report
[8] Appendix 2 to this report
[9] www.betterevaluation.org/en/rainbow_framework/manage/define_ethical_and_quality_evaluation_standards

Once the final report is accepted by TI-S, all recordings and work material related to interviews will be deleted.

2.3. Data limitations and Approach to Data Analysis and Validation of Findings

The desk review has revealed a limitation in terms of the availability of quantitative data. Namely, although the MEL matrix has been developed at the beginning of the project, none of the data to be monitored has been systematically tracked so far. Furthermore, despite the fact that most indicators in the log-frame are quantitative, information on baseline data is missing. To mitigate this shortcoming, the evaluator obtained baseline data from the project coordinator (revised log-frame) and asked evaluation participants to provide quantitative data on the numbers of grand-corruption cases and tailor-made laws reviewed, submitted to TI-S for fact-checking and review, accepted to be incorporated in the databases, and those for which TI-S' review is pending.

Once data collection has been completed, qualitative data was analysed firstly by inductively coding (groups of) evaluation questions and subsequently according to evaluation criteria (relevance, effectiveness, efficiency, sustainability), as per the Coding plan.[10] In the process of drawing conclusions, data was triangulated (sources and methods) in order to validate the findings.

On the basis of the draft report, the lessons learnt, findings and recommendations were validated during the two-day online validation workshop with TI-S and Chapters' representatives that took place on 19 May and 20 May 2020. Their inputs have been incorporated into this final version of the report.

[10] Appendix 3 to this report

3. Assessment of Project Relevance

As stated in the Introduction, the relevance of the project was assessed in relation to its broader fitting into TI's strategy globally, regionally and locally, as well as in relation to the relevance of activities and outputs vs. outcomes, i.e. its internal coherence. The latter is also related to the specificities of designing directly funded projects, where donors have significantly more impact on the design of activities and expected deliverables in comparison to projects financed by means of open calls for proposals. Additionally, designing activities for a project implemented in seven, sometimes very different countries, also plays a role in the overall coherence. Hence, these factors were also analysed to assess their impact on the project's internal coherence.

3.1. Broader fitting of the project

In terms of the project's broader fit - ending impunity for grand corruption is one of the goals in TI's global vision[11] to which the project is contributing to by means of testing the applicability of TI's definition of grand corruption at national levels. The project is also providing and making public strong evidence of legal obstacles or procedural bottlenecks enabling impunity for grand corruption at national levels, including well researched tailor-made laws that sustain state capture and impunity. Finally, the project is also in line with the elements of the TI's global strategy pertaining to building partnerships with civil society leaders in the fight against corruption, using a rights-based approach, where possible.[12]

At a lower scale - although part of this review's objectives was to "assess the project as part of the larger long-term regional programme in the Western Balkans and Turkey", the review found that the region did not have a longer-term program or strategy *per se*, against which to assess the project. **Rather, the project builds on the work carried out in the region in the form of National Integrity System Assessments since 2011, and researching capture prone sectors since 2017.** Hence, "regional partners come together in joint projects when there is funding opportunity", which indicates that for WB and Turkey, **the 'strategy' seems to be more donor-driven than related to joint discussion and decisions at the level of the movement in the region**. According to interviews, this seems to be the consequence of TI's internal structure, where individual chapters are independent organisations deciding autonomously on their own priorities which then become "a given element that needs to fit into the global [strategy]". Hence, the movement's current set-up does not provide the infrastructure nor processes for regional strategies, and "projects like this one are contributing to us having any sort of a shared priority for the region". In such circumstances, recommendations for TI's work in the region post-2020 are more related to strengthening the regional character of the projects to be implemented in the future, especially having in mind that the next regional project planned for mid-2021 to mid-2024 is already quite developed in terms of programmatic focus and activities.

A number of interviewees stated that having a regional strategy might be helpful as it would bring up the specificities of the region and thus provide more focus and enable more synergies in work conducted in the region, since "corrupt oligarchs collaborate across regional state borders". Indeed, one interviewee found the project lacking in terms of its actual regional character, and described it as a project implemented in seven countries, each in its own silos, with Chapters coming together at scarce regional meetings to discuss concepts, approaches to implementation of activities or difficulties encountered.

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[11] Transparency International (2015). *Together Against Corruption:* Transparency International Strategy 2020 (www.transparency.org/whatwedo/publication/together_against_corruption), p. 14

[12] Ibid. pp. 10-11

Despite this shortcoming, and thanks to the similarities of the region in regard to political and administrative cultures, institutional set-ups and problems related to corruption, **at the level of implementing partners' countries, the review found the project activities to be well fitted to individual country circumstances**. Namely, in all of them, the lack of sanctions for (grand) corruption is a common denominator, accompanied by a lack of publicly available data that would enable monitoring progress of anti-corruption measures and sanctioning corruption, be it petty or grand. This is exacerbated, in most countries, by tailor-made laws that enable or sustain state capture and impunity for corruption.

Furthermore, **in most countries, evaluation interviewees find the project to be a natural continuation, complementing the projects and activities conducted previously** – the National Integrity System (NIS) assessments and the research related to state capture in high-risk sectors in their countries – enabling them to "dig deeper" into the problems identified. At the same time, activities conducted so far, although not yet publicized, seem to be strengthening their efforts in interactions with authorities and non-state actors in their countries. The added value of this project was recognised in the forthcoming advocacy activities targeting the interested public and citizens at large, in order to build stronger social resistance to corruption and create higher levels of demand for integrity among decision-makers and judicial authorities. To a certain extent, this element of the project represents a novelty for those Chapters and partner organisations whose nature is more that of a think-tank than an advocacy-oriented CSO.

Finally, the project's relevance is also to a large extent related to the efforts DG NEAR is investing in terms of fighting corruption in accession countries. More specifically, from DG NEAR's perspective, the project contributes to Component 1 of the EU Integration Facility, by continued implementation of

> *…an innovative tracking mechanism to follow progress on national anti-corruption efforts and to compare progress throughout the region. The main purpose … is to allow systematic measurement of (a) the uptake of project partners' recommendations by the relevant stakeholders; (b) the extent to which each jurisdiction is utilising the legal mechanisms at their disposal to investigate and sanction corruption, and (c) the extent to which levels of corruption at the national level have changed over time in the IPA II beneficiaries involved. By promoting regional cooperation and exchange, best practices can be shared and enhanced in the region."*[13]

In conclusion to this aspect of the review, **the project is well fitted in TI's global strategy as well as to the problems and needs of individual countries involved, but is somewhat lacking in terms of its true regional nature**. *Future regional projects should strive to take advantage of their regional elements in order to multiply the positive effects, if not at the level of the entire region, then at least sub-regionally. The evaluator recommends initiating serious discussions on the potential benefits and possible shortcomings of developing a regional strategy, as elaborated in more detail in the recommendations section of the report. This process could also be envisioned as part of the current global 2030 Strategy development process, where Chapters of the region could uptake the opportunity to engage more strongly on this issue. It could also be a point of discussion during the upcoming regional meeting planned for November of this year. Namely, in the evaluator's opinion,* ***having a truly regional approach would be helpful, as it would enable planning at a sub-regional level on the basis of similarities of problems as well as in terms of monitoring and reporting on activities of "big" players***

[13] European Commission (2018). *Instrument for Pre-Accession Assistance (IPA II) 2014-2020 - Multi-Country EU Integration Facility*.p.5. available at: https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/ipa_ii_2018_040-113.04_mc_eu_integration_facility-eu_agencies.pdf

and power networks operating across state boundaries in the region. *It would also assist in fulfilling better the EU's need to compare progress in the region and to further promote regional cooperation and exchange.*

3.2. Project's Internal Coherence

This part of the mid-term review relates to its objective 'Assess and make recommendations for the revision of the theory of change, log-frame and timeframe of the project'. As such, the objective already indicated that TI-S had identified a certain level of incoherence in the internal logic of the project. Therefore, already in the preparatory phase of this evaluation, the evaluator thoroughly examined the log frame, checking its results' chain (activities → outputs → outcomes) and assumptions in relation to activities, outputs and outcomes, as well as indicators of success and target values.

3.2.1. Assessment of the Logic of the Intervention

The initial analysis of the logic of the intervention as stated in the log-frame found that for outcomes 1 and 2 there was no direct link between the activities and outputs on the one hand and the expected outcomes on the other, i.e. that **there is a gap in the 'if-then' hypothesis – the centre of the logical construction of the log frame - between outputs and outcomes**.[14] This initial finding of the evaluator was corroborated in interviews with TI-S staff implementing or supporting the project, and in their questionnaires. On the other hand, the majority of Chapters' staff involved in project implementation did not find this discrepancy in the questionnaires, which is why it was double-checked with all of them during the interviews. The interviews showed that once confronted directly with the discrepancies, the majority saw the activities and outputs to be **indirectly linked to the outcomes**, while a minority maintained their original assessments, linking them to the project's expected cumulative effects and assumptions. The identified discrepancies are a result of rather poorly worded two-levelled outcome statements, described thoroughly below.

As concerns outcome 1 – 'To improve transparency and accountability of the judiciary **by**[15] tackling impunity for grand corruption as an entry point to addressing state capture' **–** the evaluation found that **it has two levels of objectives in one statement, making it unclear** as to whether the expected outcome is *to improve transparency and accountability of the judiciary* **or** *to tackle impunity for grand corruption as an entry point to addressing state capture.* Generally speaking, **the use of phrases such as 'in order to', 'through' or 'by' in expected outcome statements should be avoided**[16] **as they hinder making them strong and unambiguous, therefore unverifiable.**

Hence, in outcome 1 **there is no direct cause-effect relationship** between outputs - coherent definition of grand corruption (output 1) and availability of information on grand corruption cases and tailor-made laws (output 3) - and improved transparency and accountability of the judiciary. Yet, the indicators of success at outcome level are all related to expected changes to legislation, policies and behaviour of authorities, albeit without targeting this expected change directly either through activities or outputs. Furthermore, it is not clear how having a definition and available information would directly tackle impunity for grand corruption. In other words, **the results chain analysis for Outcome 1 found that neither the activities nor the outputs directly dealt with either improving the**

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[14] Cf. JICA Evaluation Department (2010). *New JICA Guidelines for Project Evaluation*. p. 53, available at: www.jica.go.jp/english/our_work/evaluation/tech_and_grant/guides/c8h0vm000001rfux-att/guideline_2010.pdf

[15] Emphasis added

[16] Cf. Sansom, Kevin (2011). G006. "An introduction to the Logical Framework". p.3. available at: https://hdl.handle.net/2134/30290

judiciary or tackling corruption. A majority of evaluation interviewees agree that both activities in the long-term may indirectly contribute to either or both of the two levels of this outcome statement**.**

Having in mind the argumentation above, it is strongly recommended to revise the wording of Outcome 1, to make the direct cause-effect link between outputs and outcome. Indeed, an outcome statement that would much better fit what the project is trying to achieve already exists in the Commission's document entitled *Annex to Action Document IPA 2018/040-113.04/MC/EU Integration Facility-EU Agencies - Implementation – Budget*[17] in relation to this particular project. It reads as follows: *To improve understanding of performance of existing anti-corruption mechanisms, as well as anti-corruption progress in the relevant IPA II beneficiaries.*

Namely, the implemented activities and the output - publishing of data on grand corruption and tailor-made laws - would clearly **improve the understanding** of the performance of the judiciaries regarding grand corruption as an entry point to state capture, thus also indirectly contributing to a better **understanding of progress** in these seven IPA countries. Such a revised outcome statement, clearly linked to a specific objective already present in DG NEAR's documentation on this particular project, should facilitate in assessing the legality and approval of such a revision.

When it comes to the **relationship between activities and outputs in outcome 1**, the cause-effect relationship between organizing a 'regional meeting to agree on narrowing down two aspects of existing TI definition on grand corruption' and actually having a 'coherent definition of grand corruption for all project partners defined and agreed upon' is not very strong either. Namely, in theory, the regional meeting may be just one of the elements that contribute to having a coherent definition. There may have also been other activities that could have contributed to the coherence, such as, for example, chapter-wide preliminary discussions and definitions of what "grand corruption" is and whom it encompasses in national settings, and how these definitions align with TI's global legal definition. However, none of these possible additional activities that may have contributed to this output did not find their way into the log-frame.

Concerning output 3 in this expected outcome – 'Systematic information on grand corruption cases in the seven enlargement countries is available' - the wording of the related activity 'Conduct desk research, submit requests for information, collect verdicts for grand corruption cases, incorporate them into the software, and publish online' **confuses parts of interconnected workflow processes and actual project activities conducted by different actors.** *In order to make it clearer and better connected to the output*, *it is recommended to break this activity down into two, as follows: 'Collect and analyse data on GC and TML and submit for verification to TI-S* (chapters) and *'Review and verify data on GC cases and TML, conduct fact-checking, editing, libel-checking, translation, and publish online'* (TI-S)*. Additionally, the wording of the output would benefit from adding tailor-made laws in the statement, to fully reflect what this project's output is. Hence, it is recommended that the output statement read as follows:* 'Systematic information on grand corruption cases **and tailor-made laws** in the seven enlargement countries is available'.

This would also allow for **activities currently missing in the log-frame - fact-checking and libel-checking - that are at the same time taking up a lot of resources in terms of time and funding - to be incorporated into the log frame**.

The proposed revision of the log-frame concerning expected outcome 1 is depicted in Diagram 1 and reflects the discussions and agreement reached during the validation workshop:

[17] Document provided to the evaluator in the desk phase of the review.

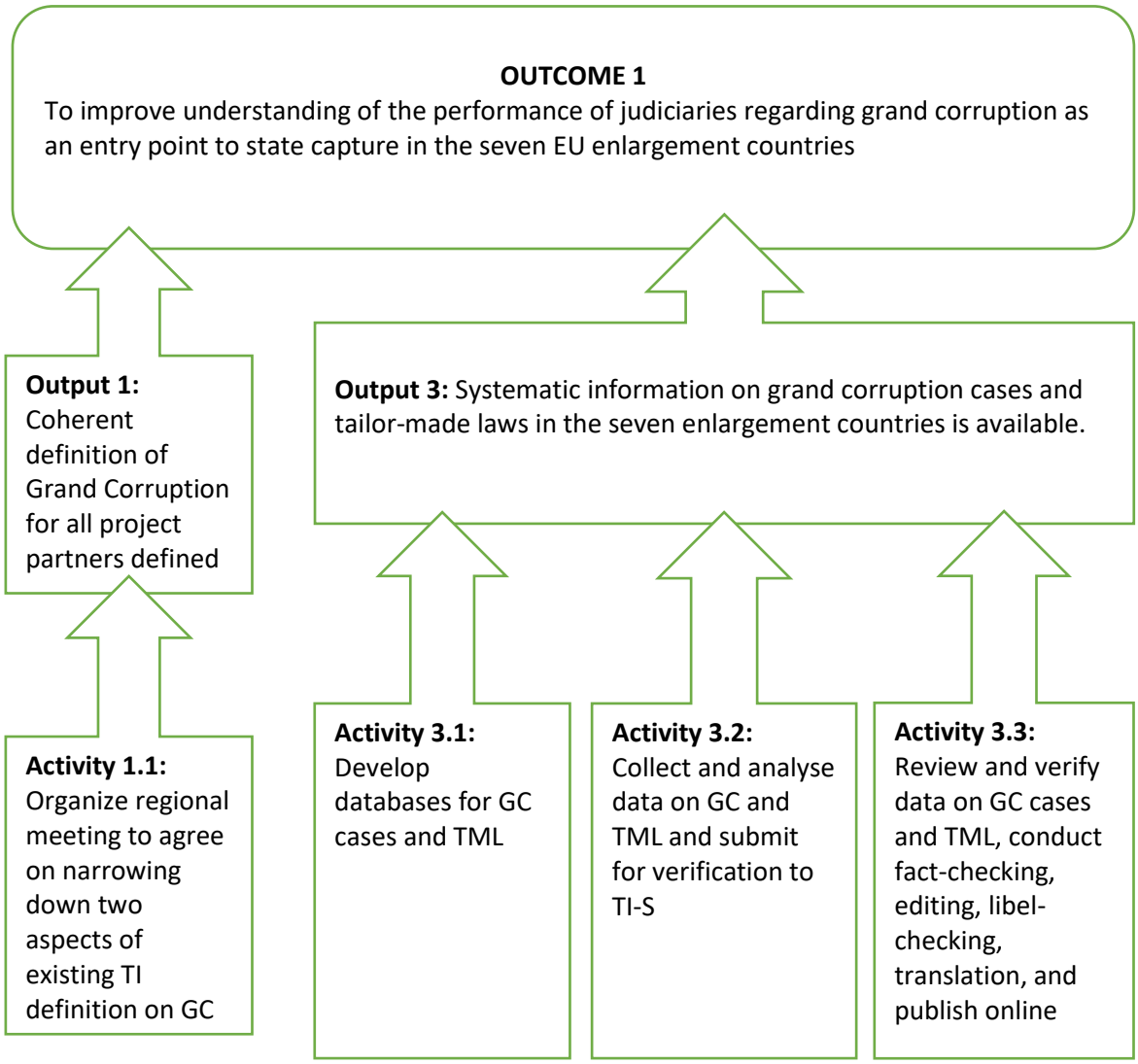


Diagram 1 – Suggested revision of the log-frame for Outcome 1

The assessment of the results chain for **Outcome 2 –** 'To improve democratic law-making by identifying tailor-made laws that establish and sustain state capture' – suffers from the same **lack of the direct cause-effect relationship between output and outcome. It is also an example of a two-levelled outcome statement**, making it difficult to understand whether the goal is *to improve democratic law-making* **or** *to identify tailor-made laws that establish and maintain state capture*. In this case too, the indicators of success are related to authorities' taking action, yet without directly working with authorities.

Namely, the output supposedly leading to this outcome is: 'Assessment of adequacy of laws and practice of criminal justice bodies, based on the NIS, GRECO and UNCAC recommendations'. However, **assessments** of the adequacy of laws and practices of the judiciary **do not directly contribute to democratic lawmaking,** as this is contingent solely on the political will of the executive. **They do, however, enable identifying tailor-made laws.** A closer look at the activities reveals that indeed they were designed in order to identify laws and practices that enable or sustain both state capture and grand corruption, with the latter, unfortunately, omitted from the output statement altogether.

*Hence, based on the draft report and discussions during the validation workshop, it is recommended that Outcome 2 be revised into: '**To contribute to democratic law-making by identifying tailor-made***

laws that establish and sustain state capture, to better reflect the feasibility prospects of outcomes of a project implemented by non-state actors. This proposed revision would still be in line with DG NEAR's specific objective 2 for this project: "To mitigate primary corruption risks in the relevant IPA II beneficiaries' jurisdictions: Republic of Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, Republic of North Macedonia and Republic of Serbia."[18]

Concerning activities themselves, in the evaluator's opinion, current Activity 2.3: 'Organise launch events and disseminate reports [on prosecution and grand corruption]' is much better suited as an activity related to Outcome "Other": 'To ensure a better understanding of grand corruption and its effects by key stakeholders in the seven EU enlargement countries'.

The proposed changes to the log-frame, agreed on during the validation workshop, are depicted in Diagram 2:

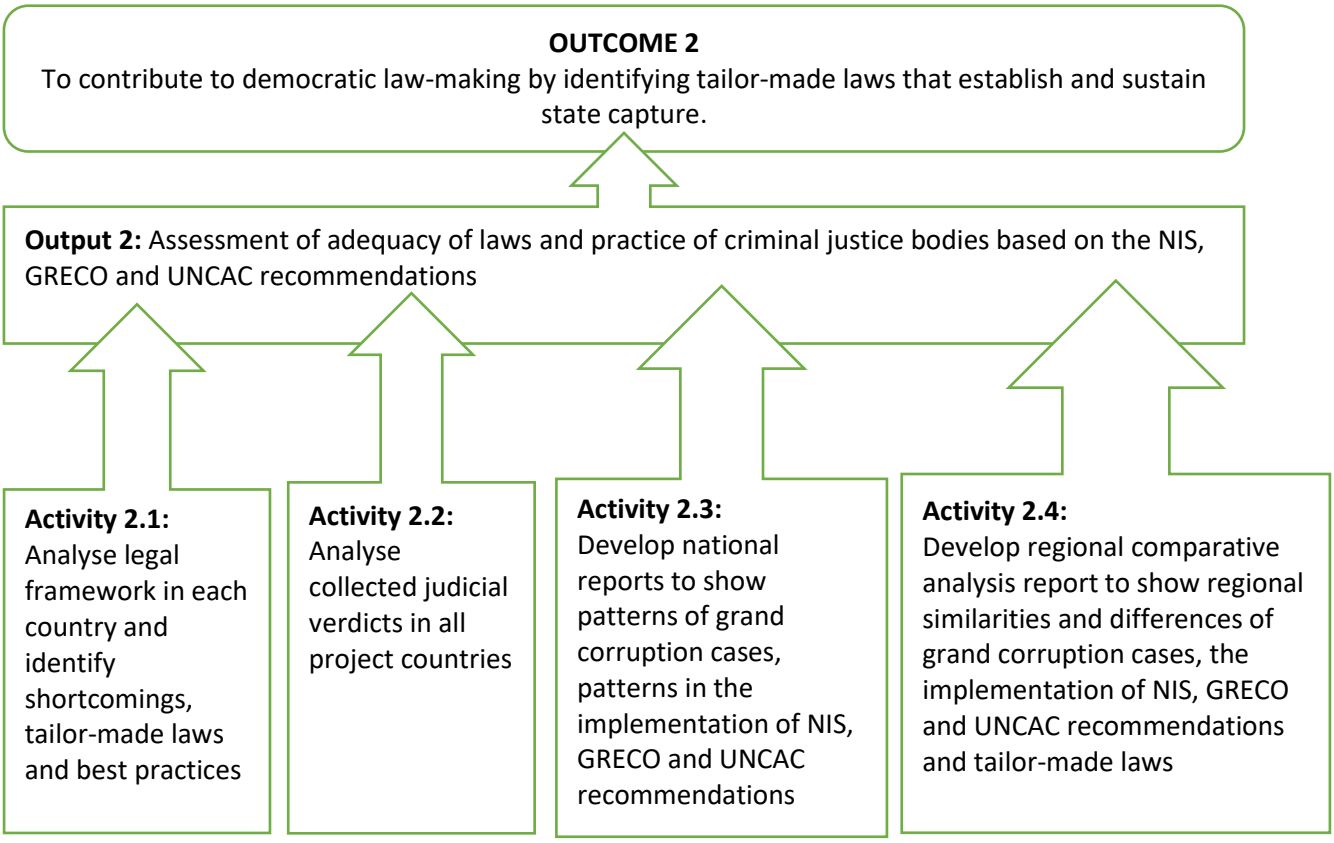


Diagram 2 – Suggested revision of the log-frame for Outcome 2

Outcome "Other" of the action – 'To ensure a better understanding of grand corruption and its effects by key stakeholders in the seven EU enlargement countries' – is a clear outcome statement. Yet, its output statement is almost exactly the same, and the relationship between the two is, in fact, a tautology: 'Better understanding of grand corruption and its effects by key stakeholders in the accession countries'. **Having in mind that outputs represent project deliverables**, i.e. **tangible results**

* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

[18] European Commission (2018). *Annex to Action Document IPA 2018/040-113.04/MC/EU Integration Facility-EU Agencies - Implementation – Budget,* p. 2

for which the implementers are directly responsible[19], **this output statement needs significant revision in order to clearly state what the project is producing**. Furthermore, implementers cannot be directly responsible for someone's better understanding of any subject, as this is beyond their direct control. Hence, the agreed upon revision of this output statement reads as follows: 'Evidence-based advocacy campaigns in target countries aimed at creating a wider social demand for political and judicial integrity.' At the same time, the outcome statement lacks mention of tailor-made laws and state capture. Hence it is recommended that the outcome statement be broadened into: 'To ensure a better understanding of grand corruption, **tailor-made laws and state capture** and their effects by key stakeholders in the seven EU enlargement countries.'

In relation to activities, current Activity 4.2 *Organize regional training on online campaigns and online tools as well as a mid-term review meeting,* should, in the evaluator's opinion be moved to the "means/inputs" section of the log-frame. At the same time, Activity 3.2 *Organise launch events and disseminate reports* [on prosecution and grand corruption] currently under Outcome 2, should be moved to Outcome "Other", as already elaborated above.

In view of this argumentation, Diagram 3 presents the recommended, agreed-upon revision to the log-frame in relation to Outcome 3:

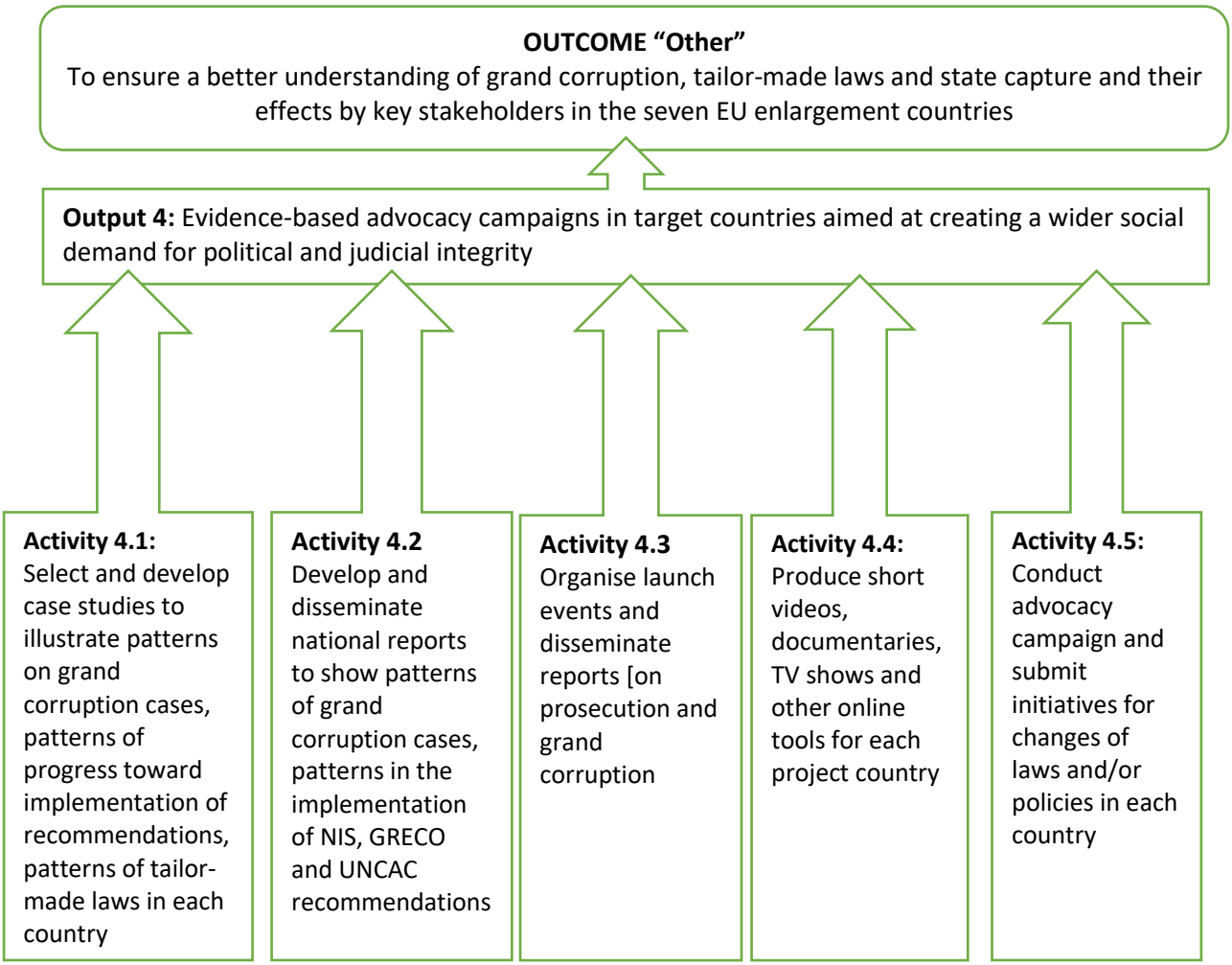


Diagram 3 - Suggested revision of the log-frame for Outcome 3

[19] Cf. Sansom, Kevin (2011). G006. "An introduction to the Logical Framework". p.6. available at: https://hdl.handle.net/2134/30290

3.2.2. Assessment of the Project's Assumptions

In project planning, assumptions represent external circumstances that must be in place in order for activities, outputs and outcomes to be achieved, yet over which the implementers have no control. They form an integral part of the project's overall coherence. In essence, **assumptions are risks worded positively, so that, in the project planning process, they can be verified[20] and mitigation measures devised**. They describe the circumstances required for objectives at different levels to be achieved. Hence, **these external factors must be present/in place at the time of the start of the intervention, for the project to be successful**.[21] **During implementation, they must be monitored carefully, and should they change, mitigation measures must be applied**.

In the planning phase, assumptions are assessed and verified from the bottom up, as follows:

- once assumptions at the activities' level are verified, activities may begin;
- once the activities have been carried out, and if the assumptions at this level hold true, outputs will be achieved;
- once these outputs have been realized, and if the assumptions at this level hold true, the outcome will be achieved; and
- once the outcome has been achieved, and the assumptions at this level are fulfilled, a contribution to the overall objective will have been made.[22]

If, during the planning phase, any of the assumptions are assessed as being very unlikely to hold true, and the project cannot or did not devise activities to mitigate this risk, they become the so-called **"killer assumptions"[23]**, meaning that the project needs to be revised.

In view of the argumentation above, in the preparatory phase of the evaluation, the assumptions underlying this project were also examined. With complete understanding that specific circumstances differ from country to country, and that it is difficult to phrase assumptions that would be completely valid for seven countries, based on her knowledge and understanding of the political and social circumstances in the target countries, the evaluator assessed some of them at output and outcome levels as "killer assumptions" (marked in colour in the Table below). These evaluator's hypotheses have then been put to the test in the questionnaires. The respondents (N=11)[24] assessed the extent to which they considered the assumptions still valid, on the following scale: *not at all, somewhat, mostly and completely*, asking them to explain those they assessed as not at all or somewhat valid. The results are presented in Table 1:

[20] MDF (2005). "MDF Tool – Assumptions". p.3. available at: www.sportanddev.org/sites/default/files/downloads/assumptions.pdf

[21] Cf. VIDES (undated). *Project Cycle Management and Logical Framework*, p.26. available at: https://bit.ly/2USPkpy

[22] Ibid. p. 27

[23] Cf. JICA Evaluation Department (2010). *New JICA Guidelines for Project Evaluation*. p. 60, available at: www.jica.go.jp/english/our_work/evaluation/tech_and_grant/guides/c8h0vm000001rfux-att/guideline_2010.pdf

[24] Please note that for a few of the assumptions a fewer number of respondents provided answers, explaining that they could not assess, as they did not understand the assumption at all.

	Assumption	Not at all	Some-what	Mostly	Comple tely
Outcome level assumption for outcomes 1 and 2	Effective sanctioning mechanisms for grand corruption improve the judicial system and procedures by decreasing undue influence and impunity of the powerful	2	1	5	3
Outcome level assumptions for outcome 3	Conducive political, societal and economic environment in place in each project country	1	3	4	1
	Anti-corruption is one of the priorities for governments and non-state actors resulting in a general commitment to transparency, accountability, integrity	1	5	4	1
Output level assumptions for all four outputs	Political will to make necessary information available from the respective authorities	2	5	3	
	Law on Right to Information is in force in all targeted countries	1	2	4	4
	Criminal justice authorities are willing to publish some information about their work		5	5	1
	Most courts are willing to publish their final decisions on corruption proactively or upon request	1	4	5	1
	Decision-makers in targeted countries are willing to make some progress towards EU accession	1	3	5	2
	At least some stakeholders are willing to participate in discussions on the criminal justice system.		1	6	4

Table 1 – Results of respondents' assessments of current validity of assumptions at output and outcome levels

The results of the questionnaire were still significantly different from the evaluator's initial assessment. Therefore, in order to clarify the issue, this was additionally discussed during interviews and by analysing the explanations from the questionnaires. These sources revealed a plethora of individual understandings of what assumptions in the log-frame represent, which may explain different assessments/scores interviewees assigned to each assumption.

Thus, there are respondents that understand assumptions to be the necessary preconditions for the project to succeed (as per the log-frame approach to project design):

> *If we understand them as things that are supposed to be true at the start of the project - they were not true back then, and they're not true now. Especially the conducive political, economic environment. Also, political will to implement reforms is not in place. I would change those assumptions, they're definitely not valid.*

Others view assumptions as something that should generally be in place, with no direct connection to the project.

> *I understand them as something that should be there generally … I have always understood them like this. Maybe I am wrong? … [if they have a negative effect on the project] then I can say I have not achieved the objectives because the assumptions have not been fulfilled [laughter].*

Here it should be noted that assumptions, although never directly controlled by the project, should not be used as a means to avoid responsibility for the project's failure.[25] Although the remark was obviously not meant to be taken seriously, this is an important point to make.

Some evaluation interviewees view assumptions as objectives that they are trying to achieve through the project:

> *[They are] still not there completely, but they should be. My understanding is that it is very valid for the project to work on these issues. It is always good to push on political will.*

In view of this understanding, it should be noted that **in the planning phase** it is indeed possible to identify assumptions which the project might try to influence. In that case, they become the project's additional activities or even objectives[26], and are no longer viewed as a risk to be monitored and mitigated. Rather, they become part of the project's purpose. If, however, they are left as "assumptions" for the implementation phase, they should not be considered as something towards which the project is working.

As is evident from the argumentation above, **assumptions were, for the most part, neither viewed as part of the project's planning process nor as a risk to be monitored and mitigated during implementation**, which is why "killer assumptions" found their way into the log-frame. However, they seem to have been influenced by the overly emphasized leverage of the accession process itself. In the proposal document, EU accession is seen as the main mitigating factor, supposedly creating conducive conditions and placing anti-corruption on the priorities' lists of governments:

> ***The main precondition for achieving the planned objectives of the project is the conducive political and economic environment in place in each project country; as well as anti-corruption being one of the priorities for government*** *and non-state actors. With the emphasis on good governance even increased and importance of the rule of law further underlined in February 2018,* ***the accession process still constitutes a unique momentum to advance anti-corruption reforms in the enlargement countries****…*[27] (emphasis added)

However, the proposal failed to acknowledge that fulfilling EU requirements, despite the new methodology for EU accession, represents a "tick the box" exercise for most governments of the region, while during implementation "the situation in most countries did not improve much, and in some instances, it even got worse." It also failed to recognize the politics of the enlargement process, which is sometimes also conducive to "things getting worse". The latest example dates back only to October 2019, when the Council of the European Union failed to reach consensus on opening accession negotiations with Albania and North Macedonia, negatively affecting the motivation to advance any

[25] Cf. JICA Evaluation Department (2010). *New JICA Guidelines for Project Evaluation*. p. 54, available at: www.jica.go.jp/english/our_work/evaluation/tech_and_grant/guides/c8h0vm000001rfux-att/guideline_2010.pdf

[26] Ibid. p.58.

[27] Description of Action, p. 24.

reforms. The fact that this Council decision was changed in March 2020[28] does not alter the negative effects of such political decisions on overall motivation to truly reform.

Nevertheless, mid-term reviews represent a point in time during a project's implementation when it is still possible to introduce corrective measures, and this is especially relevant for assumptions, since they can have an impact far exceeding what was predicted during project planning and implementation.[29] Hence, it is the evaluator's recommendation to remove all existing project's assumptions at outcome levels and for outcomes 1 and 2 replace them with valid assumptions currently associated with outputs. For outcome 3, new assumptions should be developed.

Table 2 presents the suggested and agreed-upon changes of assumptions, in relation to the previously proposed changes to the wording of the outcomes and outputs. Please note that there are no suggestions for assumptions in relation to activities, as these are assessed as still valid.

OUTCOMES	Current assumption(s)	Proposed new assumptions
1. To improve understanding of performance of the judiciaries regarding grand corruption as an entry point for state capture in the seven EU enlargement countries 2. To contribute to democratic law-making by identifying tailor-made laws that establish and sustain state capture.	Effective sanctioning mechanisms for grand corruption improve the judicial system and procedures by decreasing undue influence and impunity of the powerful	Decision-makers in targeted countries are willing to make some progress towards EU accession. At least some stakeholders are willing to participate in discussions on the criminal justice system.
3. To ensure a better understanding of grand corruption, tailor-made laws and state capture and their effects by key stakeholders in the seven EU enlargement countries	Conducive political, societal and economic environment in place in each project country Anti-corruption is one of the priorities for governments and non-state actors resulting in a general commitment to transparency, accountability, integrity	There is demand among key non-state actors and citizens for increased transparency, accountability and integrity from political and judicial authorities.
OUTPUTS	**Current assumption(s)**	**Proposed new assumptions**
2. Systematic information on grand corruption cases and tailor-made laws in the seven enlargement countries is available. **3.** Assessment of adequacy of laws (TML) and practice of criminal justice bodies (GC)	At least some stakeholders are willing to participate in discussions on the criminal justice system. Law on Right to Information is in force in all targeted countries; criminal justice authorities are willing to publish some information about their work;	Law on Right to Information is in force in all targeted countries Criminal justice authorities are willing to publish some information about their work

[28] https://ec.europa.eu/commission/presscorner/detail/en/IP_20_519

[29] Cf. JICA Evaluation Department (2010). *New JICA Guidelines for Project Evaluation*. p. 53, available at: www.jica.go.jp/english/our_work/evaluation/tech_and_grant/guides/c8h0vm000001rfux-att/guideline_2010.pdf

based on the NIS, GRECO and UNCAC recommendations	most courts are willing to publish their final decisions on corruption proactively or upon request. Decision-makers in targeted countries are willing to make some progress towards EU accession. At least some stakeholders are willing to participate in discussions on the criminal justice system.	Most courts are willing to publish their final decisions on corruption proactively or upon request
4. Evidence-based advocacy campaigns in target countries aimed at creating a wider social demand for integrity from political and judicial authorities.	N/A	There are interested non-state actors (CSOs, academia, investigative journalists) willing to pursue the issue of grand corruption and tailor-made laws in each country. Citizens generally demand more transparency and accountability from political and judicial authorities.

Table 2 – Current and proposed changes to the assumptions at outcome and output level of the log frame

In view of the argumentation provided hitherto, the adjustments to the Logical Framework are recommended in the following section of the report.

3.2.3. Recommended Adjustments to the Logical Framework

With full understanding that the Logical Framework represents an integral part of the Contract between the EC and TI-S, it is the evaluator's recommendation to DG NEAR to consider and approve the suggested changes to the Logical Framework. Namely, Article 9.4 of the General Conditions applicable to European Union-financed grant contracts for external actions states:

> *Changes in Description of Action and the Logical Framework that do not impact the basic purpose of the Action (i.e. outputs, all indicators at output, outcome and impact level and the related targets, baselines and sources of verification) shall be agreed in writing, and before the modification takes place, with the Contracting Authority. Approved changes must be explained in the next report.*

In other words, the provision considers **only outputs and indicators** (including their targets, baselines and sources of verification) as constitutive elements of the Action's purpose. In that sense, **the evaluator finds no legal basis to prevent approval of the changes to the wording of the outcomes**, as the purpose of the suggested changes is for the outcomes to better reflect and connect to the project's outputs. They do not in any way change the purpose of the Action. Similarly, Article 9.4 does not mention assumptions, and as they represent risks to be mitigated, so there should be no issue with their adjustments either.

As concerns **the suggested changes at the output level,** as explained in section 3.2.1 *Assessment of the Logic of the Intervention*, **they state more clearly what outputs the project is producing, in relation to activities**, **rather than merely reproducing the outcome statement.** Hence, the change of the wording of this output would not, in any way, impact the basic purpose of the Action either.

As a general remark concerning indicators of success and their target values, it is fairly unusual for a project as research-heavy as this one, and whose theory of change expects change of behaviour of stakeholders, to rely mostly on quantitative indicators of success. Furthermore, the targets for these indicators are, for the most part, equal for all countries, without having taken into account possible differences that the research itself might produce in different countries, especially in relation to the number of cases in the databases.

Notwithstanding the argumentation above, and taking into account Article 9.4. of the General Conditions - the target value of the indicator '# of collected cases and # of cases incorporated in the database' – 'target 50 cases per year in each country' (i.e. 700 cases by project end), the evaluator would like to point out that **these are, in fact, two indicators, yet with a single target value**. Hence, it is again completely unclear as to whether the '50 per country per year' target value refers to the number of cases reviewed **or** the number of cases incorporated in the database.

It is the evaluator's opinion that the total 700 cases may be an indicator of the total number of cases reviewed by either Chapters at the national level, while a lower, yet ambitiously realistic target value should be set for the indicator: '# of cases incorporated into the database'. Additionally, an indicator that would reflect the ratio between the number of cases reviewed nationally and the number of cases sent to TI- S for review would be a valuable addition to the log-frame. The proposed changes to the logframe at this level would not represent a breach of Article 9.4. (the target value for the first indicator would still be 700), and two additional indicators of success would be added. This change would also allow for the planned, but never carried out review of this indicator (as stated in the Project's Logical Framework which is part of the Contract). **In considering the approval of this suggested change, DG NEAR should take into account the ratio between cases submitted by Chapters and cases that pass the rigorous review and selection procedures in TI-S**, **thus providing for really strong evidence that the EC can further pursue and use in its progress reports and in bilateral dealings with governments concerned.**

As concerns target values for all other indicators at output and outcome levels, and taking into account Article 9.4. of the General Conditions, **the evaluator suggests that the total target values remain unchanged, but not necessarily the same for all countries**. In other words, the recommendation is that *as a result of this mid-term review, TI-S and Chapters engage in an exercise where they would clearly define what value each country can contribute to the overall target, and introduce this information in place of "in each target country" in the Logical Framework, where applicable.* ***These should be realistic, yet ambitious, for all countries involved, in order to meet the overall targets.***

The proposed changes to the log-frame would significantly improve the internal coherence of the project, without any influence on its basic purpose, yet making it very clear to implementers as to which outcomes they should achieve by project end. At the same time, DG NEAR would benefit from easier monitoring of the project's progress and eventually, easier assessment of its overall success.

3.2.4. Approach to Project Design and its Influence on Internal Coherence

As stated earlier, the project is a continuation of TI's previous efforts reflected in National Integrity Systems' assessments conducted in the target countries, as well as research on sectoral state capture. As a rule, the design of projects implemented regionally in TI involves inputs from Chapters and partner organisations on what they think would be the most appropriate and effective way forward. Given the differences of circumstances and problems in individual countries as well as their sizes (including sizes of their economies), and taking into consideration Chapters' autonomies and their individual characteristics and capacities, the inputs are then consolidated at the level of the lowest common

denominators. The latter enables designing activities and methodologies appropriate and relevant to all project partners. In directly funded projects such as this one, the proposal in the form of an Action Document is then submitted to DG NEAR for consideration.

For this project, TI's internal project development phase began in February 2018. The negotiations with DG NEAR began during June/July 2018, and apparently, the originally proposed activities were not seen to be in line with DG NEAR's expectations and needs. Therefore, DG NEAR asked TI to consider designing project activities in a manner that would help DG NEAR to collect data on the number of investigated, prosecuted and tried cases of 'grand' corruption, based on TI's existing definition of grand corruption. The foreseen added value was a more harmonised approach to data collection and reporting on high level/grand corruption cases in the EC's annual reports.[30] The response from Chapters was that it would entail agreeing on a common definition of grand corruption at the national level and that it would be time-consuming, given the lack of publicly available data, hence largely dependent on answers to FoIA requests. Nonetheless, it was assessed as feasible, and the full proposal was developed in the subsequent four-month period.

It should be noted that DG NEAR was at the time assuming that TI's existing definition of grand corruption would be the foundation for case selection, without realizing that the purpose of that particular legal definition was to facilitate introducing and prosecuting grand corruption in the international legal arena. Hence, the definition was very complex, and in order for a case to qualify, it needed to fulfil a series of very strict cumulative criteria, relevant in legal investigations and trials. As such, it was inapplicable in national settings, especially in relation to very high targets set in the log-frame. The chapters, however, recognised this risk, and correctly suggested narrowing down the definition. From the evaluation perspective, the **main problems were that: (1) the definition of grand corruption was conceived as one of the project's outputs, rather than a precondition for the commencement of activities, and (2) it was not anticipated that a legal definition might hinder researching social phenomena.**

Coincidentally, at the time of proposal development, TI began the process of redefining its definition of grand corruption, yet, according to interviews, communication between the two teams on the purpose of the update of the definition and how it could potentially affect project implementation could have been better. **This indicates a more general lack of a strategic approach at the level of TI, that would better connect projects implemented on the ground with TI's global vision and aspirations at the international level.**

Furthermore, once the project's main activities were agreed upon with the chapters, **in subsequent phases of project development, insufficient attention to the finalisation of the log-frame was paid by both TI-S staff supporting the project and the Chapters themselves.** This is, according to interviews, largely due to these changes happening in very tight time-frames and their being overburdened generally. Additionally**,** in the process of project development, TI-S experienced staff turnovers and relatively long gaps at the level of the project team.

Finally, according to interviews, in the process of preparing directly funded projects, the level of engagement between the Commission and implementing partners is quite high, yet also with many levels of decision-making in the EC being involved, with sometimes conflicting expectations and inputs, also occurring in very tight time-frames. In such circumstances, according to interviews, some of the activities and outputs that were discussed, found their way into the Description of Action **without**

[30] E-mail from Programme Coordinator, [redacted] to TI chapters, dated July 12, 2018

proper assessment - by either the donor, TI-S or the National Chapters – as to how they would influence the project's coherence, or how realistic they are from the perspective of capacities of non-state actors. Hence, the identified incoherencies in the logframe should be considered a shared responsibility of all those involved in project design.

Additionally, it certainly was not helpful, that TI's internal process of modifications to proposal development coincided with the change of the Head of Unit and a change of TI's contact point at DG Near[31]. All these circumstances combined added to the likelihood of misunderstandings at the level of expectations vs. level of capacities and realms of possibility.

3.3. Project's Theory of Change and Definition of Stakeholders

Taking into account the shortcomings in the approach to project development, and the lack of clarity between project activities, outputs and outcomes, as well as differences in individual country circumstances, it is not surprising that evaluation interviewees described the project's intent and primary stakeholders in different ways.

For some, the project is primarily about advocacy and increasing awareness of (grand) corruption, lack of judicial independence, and the phenomenon of tailor-made laws. For this group of respondents, the project's primary stakeholders are the **interested public (other CSOs, academics, investigative journalist, media in general) and citizens at large**, who are expected to create a bottom-up demand for more integrity, once the research results are published and advocacy activities have taken place.

For others, the primary idea behind the project is to understand and then showcase how state capture and impunity for grand corruption is even possible. Therefore, the results of the research and findings are there to build a new body of knowledge, to be used as "hard" evidence. For this group, **the primary stakeholder is the EC** (and other international institutions), who are expected to put pressure on governments to introduce changes and implement reforms, based on the project's results. Citizens are seen more as beneficiaries than key stakeholders of the advocacy activities based on the research findings.

There is also a third group – those who see the project primarily targeting **institutions of the state – the judiciary and the executive branches of government**. For them the project is about pressuring them to provide data on prosecutions, thus hopefully leading to increased numbers of prosecutions and convictions and in the long-term, improvement of the performance of the judiciary and the executive branch of government in terms of transparency and good governance. They also expect the strengthening of the sanctioning mechanisms.

None of these explanations is wrong, as they all form part of the project's implied theory of change. Namely, by collecting and analysing data on grand corruption and tailor-made laws, including through the use of FoIA, the project is creating a pressure of the respective governments and the judiciary, by making them aware that they are being monitored closely. At the same time, the review process, systematisation and public availability of the data, provided for by the databases, provide all other interested stakeholders with valuable insights – be it for the EU negotiations process, proper checks and balances, further research, or advocacy and awareness-raising of the general public. Similarly, the analysis of laws and judicial practices provides the EC, GRECO, UNCAC and other stakeholders interested in preventing and punishing corruption with evidence in regards to actual progress on

[31] Memo from Programme Coordinator, [redacted] entitled "Lessons Learnt: Proposal Development – DG NEAR, Western Balkans and Turkey", dated August 16, 2018

specific recommendations, thus creating additional pressure on the governments to design and implement more robust anti-corruption measures. Finally, outputs stemming from the research and advocacy activities targeting the general public and other non-state actors are there to create a bottom-up pressure and wider social support for anti-corruption initiatives the project implementers are lobbying for. All these activities, in the long run, contribute to tackling corruption and improving democratic law-making.

Hence, while on the one hand, the emphasis each group of respondents places on different aspects of the project indicates a lack of a coherent understanding of the project's theory of change among implementing partners, it, on the other hand, enabled each project partner to focus on what they see to be the most valuable contribution the project can deliver in their countries' circumstances. Thus, **this lack of a coherent vision, that in general terms might be assessed negatively, may in the long-term prove that, though unintended, it enabled the project to contribute to the overall objective of this action** – improving good governance in the seven accession countries, by decreasing corruption.

However, *if this supposition is valid, future planning should acknowledge it as an integral part of TI's approach to developing and implementing multi-country projects. Similarly, future projects should segment stakeholders in relation to outcomes and activities and where applicable, make them country-specific, rather than use the broad term "key stakeholders", as is the case throughout the current project proposal.*

In conclusion to this rather complicated analysis of the project's logic of intervention, **factors that contributed to identified incoherencies include:**

- the need to balance Chapters' individual priorities, needs and capacities in seven very different countries,
- the necessity to balance those with the needs and expectations of the donor,
- the lack of a definition of grand corruption as a prerequisite to begin project activities,
- the decision to apply a legal definition to social phenomena,
- the lack of clear communication between different TI-S teams on the effect of the changing definition on project implementation,
- staff turnovers in both implementer's and donor's organisations,
- the number of people involved in project design in TI without clear responsibilities as to their role and mandates to introduce/approve changes,
- the number of people involved in project design at the level of the donor,
- the lack of time to devote adequate attention to the log-frame on the part of Chapters and TI-S support staff,
- the lack of clearly designated responsibilities for overall project coherence in TI-S,
- staff turnover and lack of time in DG NEAR to properly assess the proposal, especially the log-frame.

In the evaluator's opinion, all these factors combined resulted in ambiguous outcome statements, relatively poorly defined indicators of success and target values as well as a number of "killer assumptions" in the log-frame.

Whilst time is and always will be an issue, ***both the implementers and the donors need to find it, in order to prevent incoherencies and faulty assumptions in the future, as they negatively affect implementation and may lead to frustrations on both ends.*** *Additionally,* ***in future project planning, strong involvement of TI-S' Monitoring and Evaluation officers is also recommended*** *to ensure internal coherence, and in the best-case scenarios, conduct a quick ex-ante assessment of the*

proposal/logic of the intervention. Finally, ***TI-S needs to set-up clear processes of project development, including assigning responsibility for overall project coherence.***

Despite the identified shortcomings, it is the evaluator's opinion that the **lack of coherence in the project can be resolved to the satisfaction of both the donor and the implementers,** as suggested by the changes to the wording of the project's outcomes and outputs, as well as minor adjustments to the indicators set in the log-frame. **After all, the project and its activities are still very relevant for each country involved, and for the donor.**

4. Assessment of Project's Effectiveness

At the outset of this section of the report, and even disregarding the previously elaborated "missing links" between activities, outputs and outcome, in relation to the **first levels of expected outcomes 1 and 2, most evaluation interviewees, as well as the evaluator, find them unrealistic, thus unattainable**. Namely, improving the transparency and accountability of judiciary or improving democratic law-making in any country are **long-term objectives that can be a result of a multitude of actions implemented by a multitude of actors. These cannot and should not be the expected outcomes of a single project implemented by civil society organisations, especially in countries where there is a lack of political will to do so.** Nonetheless, by implementing the designed activities the project may **contribute** to these long-term objectives. Hence the effectiveness of this project should, in the evaluator's opinion, be assessed in relation to the previously suggested changes to the outcome statements, once the project is finished.

4.1. Effectiveness of Project Activities

As regards the effectiveness of project activities, this 26-month long project actually started implementing activities as of January 2019, when the **kick-off meeting was held.** The kick-off meeting was primarily used to discuss and provisionally agree on the definitions of 'grand corruption' and 'tailor-made laws' to be collected and analysed within the project and to define the criteria for the data collection of both cases and laws. It also touched upon issues concerning the structure of the database, how to approach advocacy activities and how to monitor project's progress, using TI's MEL approach and monitoring matrix, including an exercise on developing monitoring indicators at the national level. Furthermore, it devoted a session to digital security and one to safety for staff implementing the project. While some interviewees are of the opinion that covering all these aspects during the kick-off meeting served the purpose of bringing everyone to the same level of understanding of the entire project, there are other respondents who thought that discussions on some aspects (e.g. how to approach advocacy) were too early, or too general (e.g. setting-up of the MEL system). Clearly, kick-off meetings should serve the purpose of aligning levels of understanding of the project's activities as well as management and reporting obligations. However, as already stated, this was not this meeting's primary goal. Hence, a full day was devoted to discussing the definitions on grand corruption and tailor-made laws and the accompanying database structure, while all other aspects were crammed-up into the second day, mixing activities (advocacy), general management issues (cyber-security and staff safety), and specific project management issues (MEL). **While from the perspective of efficiency, merging different topics into one event is justifiable, in the evaluator's opinion, this kick-off meeting would have been more effective had it been better structured and lasted a day longer.** This would have enabled one full day to align understandings of activities ahead of the implementers, and to discuss all aspects of project implementation and management, including the obligation to use the MEL matrix in project monitoring. Once these management issues were absorbed, the participants could have then moved to discuss important content-related issues, without the time pressure.

The second regional meeting/training took place in September 2019. This three-day-long event dedicated two days to discuss further issues related to researching cases, fact- and libel-checking and the presentation of the database structure, and half a day to the communication strategy, to technically prepare for the planned production of the video material supporting the National Chapters' preparation of visual material following the research phase. This was a modification to the plan in comparison to the Description of Action - where this meeting was envisaged to focus on online campaigns, tools and media - and is related to challenges identified with case selection and quality of

submitted cases for review. Additionally, one session of this meeting was again related to the MEL matrix, and a final one tackled the follow-up project in the planning. According to evaluation interviews, the participants strongly appreciated the parts of the meeting related to clarifying research-related issues. However, in relation to the communications and advocacy strategies' part of the meeting, opinions were somewhat divided. Hence, a part of interviewees found this part again to be too early in relation to where the project stood at that moment, while others found it timely, given the necessity to plan advocacy activities, especially the ones related to documentary production. **From the evaluation point of view, the decision to focus the content of the meeting to challenges identified was an appropriate project management decision, as was the one to start discussing advocacy approaches, given how far behind the implementation was.** However, had the project not suffered from the 5,5-month-long gap in the coordinator's position, it is likely that the challenges related to case selection and quality of submitted cases would have been tackled earlier. In such circumstances, the meeting on advocacy strategies would have better fulfilled its purpose and been held at a more appropriate time, enabling all participants to fully appreciate its contribution to the project.

In the course of implementation, the decision was made **to distinguish between the database of grand corruption cases and the database of tailor-made laws.** The structures of both databases have been prepared and the project is currently in the final phase of preparing the first batch of cases. **The public launching of the databases has been delayed** due to the problems related to data collection. **It is planned for the databases to go live during May 2020, containing the first batch of cases. However, it is highly questionable whether any visibility will come from this launch, given the media's sole focus on the COVID-19 crisis.** ***Regardless, the selection of cases and further population of the databases should continue at a much higher rate, so that once conditions are present, the project can reap the benefits of their public presentation.***

Other planned project activities have been delayed, due to the challenges described below.

4.2. Project's Challenges

The project's major challenge was the fact that it began with activities without a clear definition of what 'grand corruption' exactly is. In other words, **it engaged in researching a phenomenon without a very clear methodology to be applied across the board.** Hence, at the beginning of the project, the Chapters utilized TI's global legal definition, yet with an understanding that the definition is in the process of revision. In September 2019, TI adopted the revised definition, which is very strict in regards to the criteria a case needs to fulfil to be considered a 'grand corruption' case. Nonetheless, they applied this definition in their case reviews, which resulted in a significantly lower number of cases submitted for review to TI-S than planned – as per the project's midterm report, instead of the planned 350 cases (50 per country), they were only able to identify 184 potential cases. At this point, the project coordinator suggested lowering the targeted number of cases, but this was challenged by the donor. So, to respond to the request of the donor, but also to reflect the realities of country circumstances, in February 2020, TI-S held internal consultations and invited Chapters to a joint call to discuss proposed changes. Project partners received new instructions, now broadening the criteria to include cases that are not only grand corruption, as per the new definition, but also those that show shortcomings and irregularities in the judiciary and those that present signs of state capture. This was accompanied by a list of indicators to watch for and two exemplary cases. In other words, **in the 16th month of project implementation, the project was still struggling with defining what exactly it was researching, given the changing thresholds and selection criteria.**

The lessons learnt from this experience are twofold: (1) one should not engage in researching a phenomenon while simultaneously trying to define it; (2) legal definitions of phenomena to be applied in the (international) legal settings, are usually not appropriate for applied social research. Rather, social research should define for itself what it is analysing, depending on the circumstances on the ground**. This approach severely jeopardized the realization of the project's outputs and outcomes**. **The project would have significantly benefited from its own definition, designed for the purpose of the research and applicable in the national settings of the region, prior to commencing with activities.**

Hence, the research phase was unexpectedly prolonged, as the Chapters were, in essence, trying "to hit a moving target", which negatively impacted their enthusiasm for the project. Needless to say, this prolonged process also had a significant negative effect on the rest of the project's activities that are closely connected to the results of the research phase.

> *the [third] change in the definition, really made a lot of work. With regard to extensive revision of the work that was done … it was a major shift in the focus. We had to change the glasses in the middle of the project (…)*

However, it is also worth mentioning that the 'third' change enabled broadening of the selection criteria in order to include more cases in the databases. This decision had an impact on the cases already collected, as the cases previously rejected could now be accepted, which some Chapters appreciated. It made things easier in the sense that more of the work already done by the Chapters now was considered appropriate for the database, hence reducing the number of cases still to be collected.

While some of the evaluation interviewees are of the opinion that the main challenges to effectiveness stem from the fact that in the planning of the project too little time was devoted to methodology development, and that the time allocated for the research was underestimated due to the amount of data to be located and researched, **it is the evaluator's opinion that the problem rests in the fact that the project was unsuccessfully trying to apply a legal definition to a social phenomenon.** It was **additionally exacerbated by the lack of closer coordination and communication** between those revising the legal definition and those developing the methodology and implementing the research.

> *At the time, we didn't have really much communication between our teams as to what would be the purpose of the update of the definition. I think if we communicated it better at that stage, it would have helped the project as well.*

In addition, the project actually started implementing activities at the end of January 2019, due to the fact that there was no gap between the end of the previous project and the beginning of this one. As a result, **at the beginning of the project implementation period, both TI-S and partners were heavily engaged in narrative and financial reporting for the previous project**. ***This should be viewed as a lesson learnt both by TI-S and the donor in the current process of planning the follow-up project.***

The second major challenge was that for a very long period of almost six months, there was no project coordinator. Namely, the original project coordinator left TI-S in February 2019, while the new coordinator assumed his position only at the end of August 2019. **This meant that in the critical first quarter of the implementation period, amidst all the difficulties with the definition, there was no one monitoring and guiding the project as a whole.** On the side of TI-S, other staff supporting the project (lead researcher, regional advisor and legal advisor) filled the gap to the best of their abilities, but at a detriment to other projects they are working on, and in some instances, with objections from their superiors. Additionally, in the same period, all project partners and TI-S supporting staff were also engaged in responding to the donor's request to start the process of developing the new project.

In terms of effectiveness, on the side of implementing partners in the countries, this meant that while they were waiting for guidance and feedback from TI-S, **they had directed their attention towards other projects they are engaged on within their organisations. The shifting of focus caused prolonged periods for delivering agreed-upon outputs, and/or delivering outputs below expected levels of quality**. **In TI-S, this caused a sentiment of lack of ownership and accountability for the project on the part of national organisations**. From the perspective of Chapters, they were overwhelmed and overburdened "with no one to help us stay on track, and it's such a huge amount of work that you can find yourself a bit lost, and also working on different stuff".

For the chapters, apart from the definition itself, one of the major challenges they all encountered was the **lack of data**, other than scarce publicly available statistics that do not offer much corroborating information. Therefore, they used FoIA requests extensively, which were responded to differently from country to country, including the silence of administration or refusals of access, which then had to be challenged before appropriate authorities (Information Commissioners and courts) in lengthy procedures. In order to mitigate this problem, most Chapters organized individual meetings with journalists, lawyers, retired civil servants from the judiciary, opposition representatives and other CSOs, who provided them with necessary information. **While this also prolonged the research, it created new or strengthened existing relationships, that will certainly be useful once the project moves to advocacy.**

When it comes to **challenges ahead of the project**, the **poor quality and lack of availability of public data is something the Chapters will have to keep mitigating through gathering and triangulating data from primary sources of information, and by sending even more FoIA requests**. The latter will be more difficult for MANS in Montenegro, given the amendments to the FoIA, which, according to interviews, in 2019 expanded the discretionary powers of authorities to classify public data, especially in regard to documents 'for internal use'. Additionally, the amendments currently proposed include provisions related to denying access to information on the grounds of 'abuse of the FoIA'. The Montenegrin partner was at the time of conducting evaluation interviews strongly engaged in a coordinated CSOs' effort to stop these amendments. TI-S closely monitored this development and supported MANS with a series of support statements[32]. The joint pressure seems to have worked, as the Government withdrew the draft.

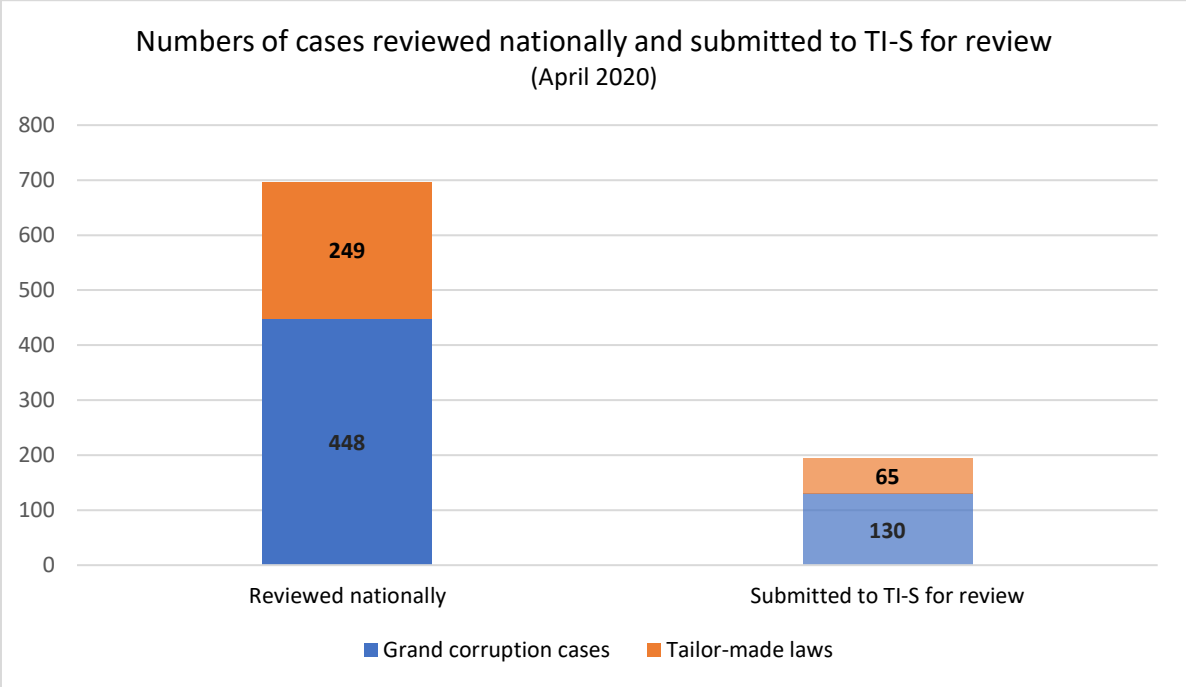
An additional challenge ahead of the project is the **definition and framing of key messages that will be sent to different audiences**, in order to promote the project's outputs and entice interest and broader action. This is especially relevant for those partners whose primary characteristics are those of think-tanks, rather than public advocacy. The decisions regarding messaging and timing will have to be made taking into account the **expected media lack of interest due to the COVID-19** related global crisis. In this sense, the **Chapters expect strong leadership from TI-S, especially in regard to ensuring visual coherence of the advocacy campaign, while they requested flexibility in terms of choice of particular messages that resonate best in their contexts.**

4.3. Project's Accomplishments

Despite the many challenges, it should nonetheless be noted that the project has already achieved some significant accomplishments. For example, related to case collection, according to data provided to the evaluator by National Chapters, **they have so far reviewed almost 700 potential cases at**

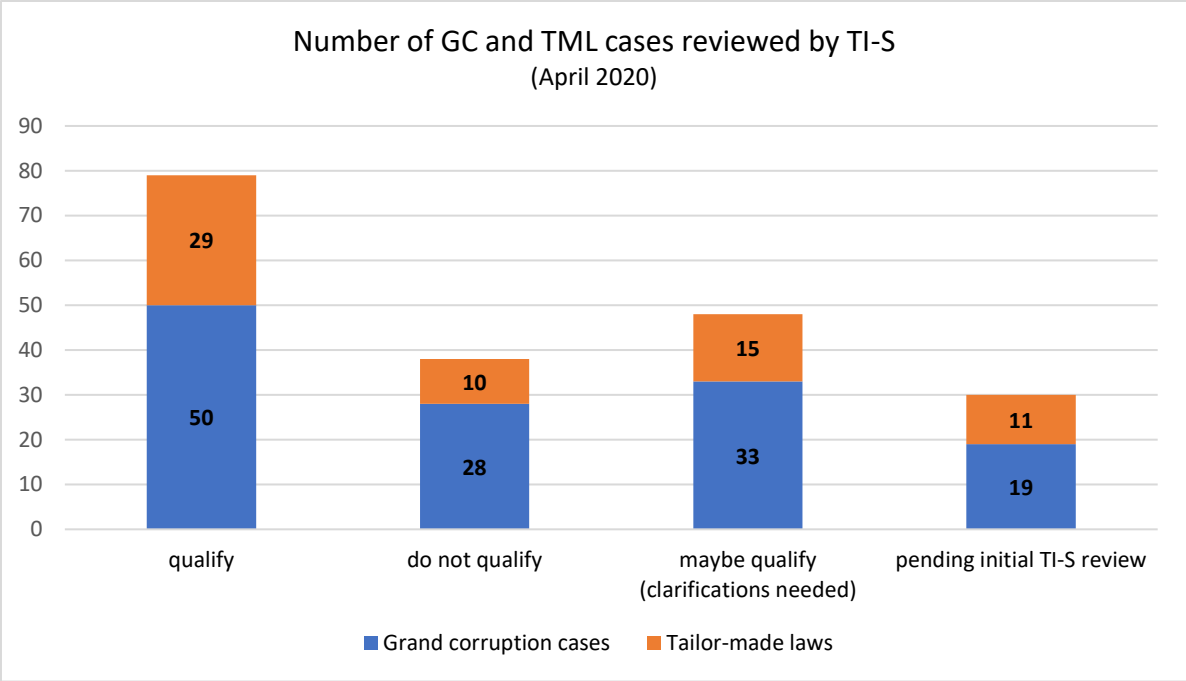
[32] www.transparency.org/news/pressrelease/montenegro_public_debate_on_access_to_information_law_must_be_delayed

national levels, of which approximately only 28% were sent to TI-S for initial review. This is also a very relevant finding for assessing the project's effectiveness, as it indicates a very thorough approach on the side of the Chapters. On the one hand, it shows that they considered the cases as widely as possible, and on the other that they were careful in initially assessing what could be a strong case in line with the definition(s), as opposed to submitting speculative ones. Graph 1 below illustrates the numbers of cases reviewed nationally and cases submitted to TI-S for review, segmented into grand corruption cases and tailor-made laws:



Graph 1

On the other end, **TI-S also employs a very rigorous mechanism of case-by-case review, to ensure that only those cases which pass all the thresholds are actually included in the databases. Additionally, the selected cases go through external fact- and libel-checking procedures to ensure high quality.** At this step of the process, diligence is also evident, since of the **195 cases that were submitted, 40% have so far been given the "green light" to proceed to the fact- and libel-check**, 25% need additional clarifications, 20% did not qualify, while the remaining 30 cases are pending TI-S' initial review, as portrayed in Graph 2 below:



Graph 2

While it is very unlikely that the database will contain 700 cases, an added value of this rigorous approach is that the database will contain only "bulletproof" cases, protecting the implementers from malicious libel suits, and at the same time providing the strongest possible data to the European Commission, that will enable tracking progress and follow-up in bilateral dealings with respective governments, and in its progress reports.

In relation to the database, the decision **to distinguish between the database of grand corruption cases and the database of tailor-made laws**, enabled them to be more user-friendly, but also to better document this **newly created body of knowledge, which none of the involved countries previously possessed in such a systematised manner**.

The positive side of the difficult process of case collection, according to interviews, is that **TI now has a relatively strong methodology for identifying and analysing both grand corruption cases and tailor-made laws at national levels**, which is expected to contribute to TI's efforts in other regions of the world. The project also tested the new legal definition in national contexts, which is a valuable result in the long-term for the organisation. In the case of the latter, in the evaluator's opinion, the main lesson learnt is that legal definitions to be followed in official investigations and court trials are not necessarily appropriate in applied social research, whose main goal is to understand, describe and devise strategies to fight corrupt behaviour.

The research also revealed that in terms of tailor-made laws, Kosovo seems to be an outlier, as of just 12 identified potential cases, only 1 was actually confirmed. Nonetheless, **the partner in Kosovo engaged in a pre-emptive exercise and prepared and published a policy brief[33] explaining the phenomenon and linking it to its advocacy efforts aimed at regulating lobbying activities. In the case of North Macedonia, the term "tailor-made law" entered the interested public's discourse**, including that of other CSOs gathered in the national Anticorruption Coalition. Additionally, as a result of **Turkey's** rather specific political situation and the Chapter's inability to work directly with the

[33] KDI (2019). *Tailor-made law: Has the time come for a law on lobbying in Kosovo?,* available at: http://kdi-kosova.org/wp-content/uploads/2020/03/92-Raporti-Legjislacioni-i-porositur-Eng-04-1.pdf

authorities, **the Chapter prepared and published the visualisations of the progress for GRECO recommendations for all assessment rounds**, which got quite a lot of attention. Additionally, **they also published judicial statistics they received from law enforcement agencies via FoIA and from the annual reports of the judicial authorities**. The combined information published in open data formats enables versatile analyses. For example, it revealed an increase of 12% in the number of investigations that are not turning into real court cases. This finding struck significant attention from academia and civil society. ***Whilst TI Turkey uses this approach as a mitigation strategy for their inability to influence authorities directly, it is an approach that other Chapters might also consider to make some of their findings public before the launch of the databases and publishing of national reports.***

The data collected, analysed and eventually published will also enable all Chapters to speak about grand corruption and impunity based on evidence rather than anecdotes or speculative media cases, which will **strengthen their positions as anti-corruption actors in their societies, but also in the international arena**.

Finally, some evaluation interviewees reported **an increase in the capacities of persons working on the project** in terms of their better understanding of the research process and the researched phenomena.

4.3.1. Synergies and cooperation

Depending on individual country circumstances, **although project's outputs have not been publicized yet, the results of conducted research have aided their efforts in lobbying** for stronger anti-corruption measures in national strategies and legislation (Bosnia and Herzegovina and North Macedonia) or in legislation related to regulating lobbying activities (Serbia, Kosovo), while in Turkey they were used to strengthen the relationships within the broader CSO coalition. Additionally, in Serbia the results were used in training organised by the Chapter for local media, CSOs' and local authorities' representatives.

In Kosovo, the project created synergies with an ongoing project implemented by the Council of Europe that is focused on corruption risk assessments of particular laws, resulting in closer cooperation and exchange of information and knowledge on an on-going basis. In North Macedonia, the cooperation between TI Macedonia and the parliament has significantly improved, and the Chapter was actively involved in drafting the new Law for the Prevention of Corruption and Conflict of Interest. Additionally, they were able to secure a commitment from the director of the Judicial Academy to introduce corruption and tailor-made laws as an obligatory part of the Academy's training curriculum.

TI-S was devising plans with OSCE ODIHR to hold a joint "political integrity bootcamp", which is now in the process of redesign to enable it to move online, due to the COVID-19 lockdowns.

Finally, a very strong potential synergy that might amplify the results of this project is the one with TI's global Advocacy and Legal Advice Centres (ALACs), that provide free and confidential legal advice to witnesses and victims of corruption. As most of the involved countries also have ALACs, *it would be prudent to check whether any citizens have reported corruption that is related to the cases reviewed by the Chapters within this project. If there are such cases, then a personal story of a real person affected by corruption could become a powerful tool to spread the message in the wider society. Such stories are also always appreciated by the media. Similarly, cases reported to ALAC could be an additional source of potential cases to be selected for the databases as well as illustrative stories of how corruption affects citizens that could be utilised in videos and the upcoming advocacy campaign.*

4.3.2. Effectiveness of Support from TI-S

TI-S staff (project coordinator, lead researcher, legal advisor, regional advisor) engaged in providing support through email communication and group video-calls, where issues related to research challenges and quality of outputs were discussed. They also provided detailed feedback on the cases submitted for review by chapters, and lately started engaging in individual rather than group calls. Individual live feedback sessions with the research and legal advisors concerning the cases submitted for review are very much appreciated by Chapters' staff, as opposed to written exchanges on cases that were taking place previously. Both TI-S staff and Chapters are of the opinion that this type of direct, live exchange yields better results in terms of deciding what makes a "good case", and what type of additional corroborating evidence is perhaps needed. Hence, **the switch to individual calls proved to be more effective, and both TI-S staff and Chapter staff appreciate this approach, as it yields better results in a shorter amount of time.**

During the six-month gap in coordinator position, the lead researcher and the regional advisor took the lead and engaged with the chapters, providing guidance and support in relation to case selection according to the criteria. However, due to other obligations, they were not able to keep up with the Chapters on a regular basis, in the same way the project coordinator would.

> *The support that we received, had to do with the understanding, knowledge and capacities and the quality assurance standards. It has been adequate. We have received detailed feedback on every single case of grand corruption. We have been in constant communication on details related to the research. The whole exercise has been very, very needed and very, very helpful for us and our understanding.*

According to interviews, the arrival of the new programme coordinator has substantially improved the quantity and quality of exchanges, and has resulted in more timely delivery of research related outputs and better overall project management and coordination. The new coordinator is seen as a reassurance figure, in terms of improved efficiency in overall project coordination, as someone who "holds the reins" of the entire project and who will ensure that regular communication with Chapters takes place. In this case too, one-on-one exchanges are seen as more effective and efficient.

In terms of **expected support for the remainder of the project**, the Chapters expressed an expectation to have **at least bi-weekly one-on-ones to discuss case-related issues and progress. Some also spoke of a need for an increased number of joint face-to-face meetings** to work on developing messages and devising strategies for advocacy that is ahead of them. *While the latter may no longer be feasible due to the COVID-19 lockdowns, the idea can still be turned into well-structured and well-facilitated, issue focused on-line regional meetings. Indeed, the COVID-19 crisis demands a serious discussion on how to approach messaging and all advocacy activities, as this will have a significant impact on the overall project effectiveness in expected outcome 3.* **The risk to be mitigated is the omnipresent and prolonged loss of media, but also the general public's interest in issues not directly related to COVID-19 pandemic and the expected worldwide economic crisis that will follow. Additional risks include the general back-sliding in the rule of law and already weak systems of checks and balances, as well as increased integrity risks - suspension of Parliament in Serbia, lack of proactive disclosure, extended deadlines for FoIA responses – for the most part falsely attributed to the COVID-19 crisis-management.**

Additionally, **multiple interviewees expressed an expectation for TI-S to organize a presentation and debriefing meetings with DG NEAR at the end of the project**, so that the results of individual countries can be explained in more detail to country desk officers, including providing background information

that could not find their way into the national reports. *TI-S should explore this possibility from the perspectives of budgetary implications and willingness of DG NEAR to engage in this additional activity.*

In conclusion to this chapter on effectiveness, below is a list of factors which either positively or negatively affected the project so far, and those that might have an effect in the remaining period.

Factors that positively affected the project so far:

- The support provided to Chapters by research and legal teams in TI-S
- The interdisciplinary approach to rigorous case review and selection in TI-S
- The eventual filling of the project coordinator position
- The shift from group to individual interactions in online meetings
- The reputation of Chapters and partner organisations in their countries
- Building of broader CSO coalitions
- The use of FoIA in order to obtain data
- Identifying and engaging with primary sources to obtain missing data
- Maintaining good relationships with media and especially investigative journalists
- Exploiting opportunities to create synergies
- Using research data to support other anti-corruption efforts conducted within implementing organisations.

Factors that negatively affected the project so far:

- The decision to use the legal definition
- The decision to begin research without a clear definition of what is being researched
- The lack of coordination between teams working on the revision of the definition and ones implementing the project, accompanied by the lack of mandate and authority of programme coordinator to decide on the definition issue earlier in project implementation
- The leaving of the project coordinator at TI-S in its inception phase, accompanied by a long period of the gap in this position
- The donor's insistence on reaching the targeted number of cases in the databases
- The need to constantly revise the work already done to fit the changing definitions
- The lack of publicly available data
- Long periods of administrative silence or refusals of authorities to provide data, resulting in long appeal procedures
- Slow response times and sometimes low quality of input provided by chapters, due to lack of overall coordination and monitoring, and shifting of focus to other obligations
- Slow response times of TI-S staff, due to other obligations.

Factors that may have a positive effect in the remaining period:

- Investing additional efforts and resources to complete the research phase and move on to other activities in the project
- DG NEAR's readiness to adjust the log-frame in terms of the wording of outcomes and in terms of indicators of success and their target values to reflect realities of different contexts
- Appropriate decisions concerning the timing of placement of findings into the public, in relation to COVID-19 crisis

- The quality and creativeness of messages to be developed and the appropriate choice of channels through which they will be sent
- Effectiveness in connecting with different stakeholders in the advocacy phase, including devising appropriate mobilisation strategies
- Amplifying the regional character of the work conducted
- Strengthening relationships with media and investigative journalists
- Strengthening relationships with broader national and regional organisations and coalitions working on good governance and public integrity
- DG NEAR's readiness to use the project results to put pressure on governments.

5. Assessment of Project's Efficiency

This part of the report reflects on allocation and use of resources, the quality of project management, including the quality of communication and cooperation among the implementing partners, as well as on resources and capacities necessary to effectively implement the remainder of project activities and achieve outcomes.

5.1. Project Management

5.1.1. Structural issues

With no project coordinator, project staff at TI-S compensated to the best of their abilities, and within their own areas of expertise, yet this was insufficient given the challenges they were facing. The challenge here seems to be related to **structural issues at the level of TI-S. While this is beyond the scope of this review, several of those issues negatively impacted the project, and will therefore require adequate management response in relation to the continuation of this project, while certainly being beneficial to any future projects.**

According to interviews, high levels of staff turnover and limited employment agreements, accompanied by long recruitment processes exacerbated the problems faced by this project. From the perspective of project management, it was very difficult not to have the coordinator in place for almost six months, as there was nobody in charge of project oversight generally, and nobody regularly in touch with Chapters to monitor progress and liaise between Chapters and other support staff at TI-S. **More importantly, structurally, the position of the program coordinator itself seems to be lacking the necessary mandate and authority to actually decide on issues and take the lead in overcoming content-related problems**. Rather, it is conceived as an administrative management position in relation to Chapters, and a reporting position in relation to the Donor[34]. Hence, in the evaluator's opinion, the programme coordinator position lacks the necessary authority to actually fully manage projects in their portfolio. This is a hindering factor in terms of both effectiveness and efficiency, and makes coordination (beyond administration) difficult, especially in relation to "ensuring that that agreed goals, best practice standards, donor obligations and TI-S regulations are met."[35]

It seems that the management at TI-S at the time failed to adequately respond to the issue of the vacant position of the programme coordinator, even when negotiations with the donor on the next project began. Those negotiations continued at their regular pace, despite the fact that the program coordinator was not recruited yet. From the project management point of view, this process further endangered project implementation. Namely, during those months, the regional advisor and the lead researcher were also engaging with Chapters' staff in discussions related to the follow-up project, as previously mentioned. So, they lost time from project implementation to engage in thinking about the next project, while in the same period, momentum was lost in terms of case selection and review in TI-S.

In addition, according to interviews, there seemed to be a lack of mechanisms in place to ensure efficient hand-overs and easy access to organisational knowledge and institutional memory, partially also due to internal restructuring in TI-S and significant downsizing at the time. This prolonged the orientation period of newly hired staff, which is certainly not beneficial even in the best of circumstances, while for a project that was already behind schedule it created more problems.

[34] This conclusion is based on project hand-over document and program coordinator vacancy announcement.
[35] External Job Advertisement for the position of Programme Coordinator.

However, this seems to have been rectified in the meantime, as TI-S is in the process of introducing a new (project) management software, that should easily provide access to the institutional knowledge-base.

A final point related to structural issues in connection to project management has to do with the structure of the movement and the relationship between TI-S and the chapters. Globally, TI is a loose network of independent organisations, and the role of the Secretariat is to support chapters. Hence, this is not a hierarchical relationship, whereby the Secretariat can demand anything of chapters, even in situations when Chapters fail to send deliverables, including progress reports, as was the case in this project. The structurally imposed lack of authority of the position of programme coordinator played a role here too. At the same time, escalating such project management issues to higher levels of management, is not something that is done at TI-S, according to interviews. While horizontal structures are beneficial and generally more democratic than hierarchical ones, it is the evaluator's opinion that ***TI needs to develop a process where there are clear lines of accountability and mechanisms that can be engaged in relation to joint project implementation. When TI-S is the coordinator of a joint project, a clear hierarchical relationship needs to be developed.*** **This type of relationship does not need to and indeed should not spill over to other aspects of TI's work and decision-making at the level of the movement, but it is crucial for efficient project management.**

5.1.2. Human Resources and Capacities

The gap in the position of coordinator and the issues with the definitions and lack of data caused significant delays in the implementation of other related planned activities – selection and development of case studies and reports at national levels, partnering with film-makers, engaging in systematic advocacy activities, production of video materials and on-line communication messages. Therefore, **the general perception of evaluation interviewees is that the project is between three and six months behind schedule**.

Whilst **a high number of positions with relatively high proportions of time allocations have been planned for in the budget - given the challenges related to research implementation, elaborated in the previous chapter - the time allocations proved to be insufficient both in TI-S and in Chapters**. Additionally, in TI-S, the research coordinators official allocation was reduced from 40% to 30%, due to internal allocations, even though her actual engagement was higher than originally envisioned. Furthermore, some Chapters also experienced staff turnover and structural changes in the first year of project implementation, which was also reflected to a certain extent in lower efficiency in project implementation. According to interviews, this risk was mitigated by allocating additional time, and additional human resources, at no additional cost to the project. However, the cost was paid in the higher risk of staff burnout, which may become an issue in the remaining period.

The perceptions of capacities to deliver all project outputs is assessed differently by TI-S and by chapters. Hence, in TI-S, there is a concern in regards to capacities of Chapters to deliver the outputs at a higher level of quality and in a timely manner, which they perceive to be connected to a number of factors: (1) the number of projects on which Chapters are engaged; (2) Chapters' fighting to survive in unfavourable political and financial circumstances; (3) lack of time devoted to strategic thinking on the bigger picture individual projects are contributing to in the regional setting; (4) in some cases, lack of research experience and in others, lack of advocacy experience; (5) lack of human resources in the organisation, which cannot be fulfilled either due to financial instabilities or due to the lack of experienced individuals on the labour market willing to work in financially unstable organisations. In that sense, **TI-S has expressed the need for Chapters to be more proactive in expressing their needs to the Secretariat in terms of the types of support they need** in this project and beyond.

On the other hand, **Chapters all feel that they have enough staff, knowledge and experience to deliver this project's promises, but that the issues with the definition and unavailability of data were the main reasons they underperformed, exacerbated by the number of other obligations they have on other projects they are involved in.**

In the evaluator's opinion, the truth regarding capacities probably lies somewhere in between, *but it needs to be discussed openly, in order to ensure that the best mitigating measures to efficiency are devised.* Namely, the reviewer was somewhat surprised to learn how little information TI-S supporting staff had on the overall workloads and staffing structures of chapters, other than during the re-accreditation process taking place once in three years. This is, again, related to the structure of the movement and the autonomy of chapters, as well as overloads and related lack of proactivity on both ends. All these circumstances hinder TI-S in providing more tailor-made support to chapters. *This issue may possibly involve opening up discussions at a level higher than that of this particular project, should TI-S and Chapters recognize the need to systematically invest into organisational development of the chapters.*

Generally, **the quality of communication and cooperation between TI-S and Chapters is assessed by most interviewees as adequate and satisfactory**, especially since the arrival of the programme coordinator and the switch from group to one-on-one conversations on both project management and case reviews has happened, as elaborated in the previous section. In the period during which there was no project coordinator, the Chapters appreciated the regional advisor's stepping in and taking on the coordinating role, yet they are aware of the obstacles in relation to other projects she had to tend to.

On the other hand, there seems to be significantly less communication and cooperation between Chapters themselves. The sporadic exchanges seem to be more related to personal relationships than to structured discussions and exchanging of material, problems and solutions, unless organized by TI-S. *This, in the evaluator's opinion, is also an issue to be discussed and possibly agreed upon, as a number of interviewees actually expressed regrets at not having more individual or sub-regional exchanges that might help them in situations when they get stuck on a particular issue.*

5.1.3. Monitoring Project Implementation

TI-S has an internal monitoring and evaluation unit, who have been engaged at the beginning of the project implementation to design the project's MEL matrix. During the two regional meetings, TI's MEL approach has been presented to Chapter representatives present at those meetings. Moreover, after the second meeting, all Chapters received very detailed guidelines on designing their internal monitoring approach. However, as already stated elsewhere in the report, **this was not understood by Chapters as an obligation, which is why none of them actually gathered any monitoring data**. According to interviews, some view the monitoring matrix as "*something TI-S does, so that it can get a full picture",* others *"don't think it would have helped us, because we know what we are doing, and it wasn't requested as part of the report".* Some "*don't find the approach too useful"*, while others "*feel very far away from that part".* Clearly, MEL was never seen as an integral part of project management at all levels. In the evaluator's opinion, **one of the reasons for this is that the MEL training was a 1.5-hour long session at the end of a very tiring regional meeting that mostly dealt with the many problems related to obstacles to research, and participants could not absorb it.** This was also clearly expressed by one of the interviewees:

> *…the problem with such trainings, I mean, we can't ... No one should expect us to absorb. It's a huge component, organisation component, after like a three hour round table. It doesn't go like that.*

Clearly, *TI-S needs to develop processes in which monitoring and evaluation become an integral part of all projects it is implementing in all chapters.* ***The MEL matrix should be introduced as an accompanying element of the Chapters' narrative reports****, from which they draw data for the report, and which corroborates their claims in the reports. In the context of this project, it is recommended that an adjusted MEL matrix be developed at the project- and at Chapters' level, once necessary adjustments to the log-frame are approved by the donor.*

The other problem is that **the MEL unit was not engaged in monitoring the application of the MEL matrix at the Chapter level. The reasons lie in the fact that the MEL unit actually consists of only two people, working on all projects in which TI-S is involved globally.** Consequently, the MEL officer was allocated only 5% of their time, and only in the first project year to '*provide support to the monitoring, evaluation and learning work at TI-S and project partner level throughout the duration of the project, particularly in the development of a MEL framework and the external mid-term review*.'.

The small number of staff in the unit and the related minuscule time allocations send the very wrong message of the MEL's insignificance to overall programmatic success, both at the level of the organisation and for individual projects. This is yet another structural issue in essence, which may be part of the reasons why the MEL matrix was not taken seriously by Chapters and why people "do not feel connected to that part of the work".

The structural issue translated to working days in this particular project amounted to a total of 12.5 days. Clearly, the 12.5 days do not allow for providing adequate monitoring support throughout the duration of the project, especially one of this complexity, even had it had a coordinator all the time. Had the MEL officer had a more significant allocation, perhaps the issue with the outcome statements and targets in the log-frame would have been recognized at an earlier time, and mitigation measures taken up much sooner. Similarly, they likely would have picked up the issue of Chapters' failure to fill out the matrix and reacted in time. **This should be viewed as a lesson learnt for future project planning and implementation. MEL is a crucial part of project management; hence, staffing of the MEL unit and time allocations need to reflect its importance.**

It is the evaluator's opinion that an adequate time allocation would have been 1.5 days per month, throughout the implementation. That would have amounted to 38 days in total (15%), allowing for the matrix and accompanying explanations to be developed, and for the MEL officer to spend one day a month collecting monitoring data from chapters, and half a day a month to support the project coordinator, by providing a bird's-eye view of the project's progress. ***Clearly, TI-S should develop a more systematic approach to MEL, firstly by adequately staffing the unit and subsequently by investing efforts into Chapters' understanding of the longer-term benefits of the MEL approach to their organisational development.***

5.2. Financial Management

The project operates on a budget of 1.111.109 EUR, of which 39% is allocated to TI-S and the remaining 61% to national Chapters and partner organisations (between 9% and 11% percent of the total budget per chapter/organisation). Overall, the two largest budget components are human resources and advocacy: 60% of the total budget is allocated to human resources working on the project, and 18% to advocacy activities and costs of publishing and disseminating project outputs. **The delay in**

implementing project activities, apart from having negatively impacted effectiveness, also resulted in serious underspending of the project in the first year.

Of the projected 540.420,00 EUR for the first year, only 351.578,42 (65%) was spent. Hence, **at the end of 1st year of implementation**, **the overall budget was at only 32% spending rate. Additional underspending is expected in relation to projected travel costs and costs for conferences, meetings, and other types of face-to-face interactions, due to the COVID-19 lockdowns**. *In this respect, and having in mind the amount of activities still to be implemented, it is recommended that a reallocation request, accompanied by a no-cost extension request is sent to the donor, as soon as the decision is reached on how the project plans to proceed.* ***This decision will require serious discussions both with partners at the levels of the countries and within TI-S.***

Discussions on the no-cost extension have already started with the Chapters, and according to interviews, most agree that an extension of at least three to six months will be necessary for the project to complete all of its planned activities. **If the current projections for the duration of the COVID-19 pandemic hold true, it is the evaluator's opinion that a three- to six-month long no-cost extension would be appropriate.**

The financial reallocation should **partly be invested into maintaining the current levels of human resources both in TI-S and at Chapters' level, yet with a strong commitment of all parties to use this opportunity to deliver outputs within the agreed timelines, and at the level of expected quality**. If some of the unspent amount is not redirected towards human resources, the risk of staff burnout will be amplified in the remaining period, with possible negative implications on the quality of advocacy activities and overall effectiveness. Namely, almost all interviewees stressed that they would be losing team members, which would significantly increase their workloads.

The other major part of the reallocation would have to be used to introduce the already mentioned costly project activities – the fact-checking, editing, translation and the libel-checking – which are not part of the current budget. This serious omission in the budgeting phase needs to be rectified. Namely, the projected cost per case is about 100 EUR, which, assuming the project reaches 350 cases in the databases, amounts to around 35.000,00 EUR, that are currently not budgeted at all.

Finally, the budget-line items related to advocacy activities will need to reflect changes necessary for the project to adjust to the COVID-19 lockdowns.

6. Prospects of Sustainability

In relation to sustainability, the review focused on identifying current or planned activities that might contribute to fulfilling this criterion by the end of the project implementation period.

Not surprisingly, most evaluation interviewees find the **databases of grand corruption cases and tailor-made laws to have the strongest sustainability potential as well as the strongest potential for spill-over effects**, as it is perceived to be the innovative approach of this project that will create the most added value. Namely, it is seen to be at the same time a powerful monitoring tool for anyone working on anti-corruption and a user-friendly tool for other CSO, investigative journalists and citizens, describing the problems in non-technical terms.

Accordingly, interviews revealed that most Chapters are willing to continue updating the databases, at least in relation to the cases of grand corruption they have submitted, which are still ongoing. Should TI-S find resources to continue funding the case review, they are also open to the possibility of supplying new batches of cases. A minority of interviewees stated that without funding for human resources, they would not be able to keep up with updating the databases, given the amount of work it requires. Building on the experience and lessons learnt from the current project, the follow-up project plans to develop a similar database, using a similar design, to present cases of corruption causing significant social harm to citizens, with a particular focus on corruption-prone sectors, such as the field of healthcare, education, and environment, as well as political corruption and election campaign.

Regardless of funding, Chapters plan to continue working on and monitoring different cases, depending on their primary organisational foci. Hence, for example, the Chapter in Bosnia and Herzegovina, due to its programmatic focus on the reform of the judiciary, plans to continue monitoring the investigations and trials of corruption cases and reporting on the judgements. On the other hand, Turkey plans to continue working more on tailor-made laws, since legislative monitoring initiatives were not present in Turkey prior to this project, while they find the structure of the database to provide the necessary, yet innovative framework. They also see a possibility to **strengthen the databases' value by using advanced visualisation technologies that would portray the complex networks involved in state capture mechanisms, and therefore strengthen the potential to mobilize the wider public. This is, of course, contingent on securing funding**, **but is, in the evaluator's opinion, *worth exploring even now, given the necessity to adjust advocacy activities due to the COVID-19 crisis.***

The databases will also serve as a monitoring tool that will be used by the EC to put the issues related to high-level corruption at an even higher scale of its political priorities in the enlargement process, in the hope that putting the focus on the biggest cases would be an additional driver for change. Indeed, many of the interviewees expressed the opinion that **sustainability of project's results will perhaps be best recorded in the EC's (and the international community, generally) pressure on their governments, using the findings of the data they have provided and systematized.**

Interviewees are almost unison in stating that the **results of the research, but particularly the database will become a resource extensively used by investigative journalists and other civil society organisations,** with the hope that other segments of civil society would also start using the anti-corruption framework to advance their goals, simultaneously strengthening the work and positions of Chapters in their respective countries.

In terms of planned activities that contribute to sustainability, some chapters/partner organisations have already started working on concepts or engaged in initial conversations with potential donors for

new projects, particularly focusing on tailor-made laws (e.g. Serbia and Albania), while others (e.g. Montenegro) plan to continue working on case studies on tailor-made laws, in the hope that other CSOs would also pick-up the approach and consequently change the way they interact with and report to EU delegations and DG NEAR.

Regarding **spill-over effects, they are expected at the level of the wider society, as the result of advocacy activities**. They are appropriately assessed by evaluation interviewees as **contingent on the quality of messages, channels of communication and timing of their placement.** In other words, if these preconditions are met, the hope is that the advocacy activities will significantly contribute to awareness-raising and understanding of the scale of the problems among the citizenry, that would eventually lead to stronger bottom-up movements demanding more transparency and accountability from the judiciary and from the political elites. This, on the other hand, may incite interest among other donors operating in the region, funding these types of activities in the future.

A potential for spill-over effects is also perceived to be present with other CSOs, by inspiring them to apply a similar approach of collecting evidence and producing knowledge and then using it for their advocacy work.

Finally, in terms of sustainability, there is an expectation targeting TI-S, to devise an approach on how it plans to use the material in the future, beyond the planned regional report, and whether there would be interest and capacities to engage in longer-term monitoring at the regional level that would enable periodic analyses of trends. The other side of this coin, of course, is for Chapters and partner organisations to continue providing the necessary data. In that sense, *it is worth exploring whether the data to be supplied in the future might be less demanding and time consuming for chapters.*

In conclusion to this chapter, **the evaluator finds strong potential for sustainability of the project's results, which is on the other hand extremely dependant on whether the project shifts into a higher gear, both in terms of efficiency and in terms of the innovativeness of messaging and approaches to advocacy.**

7. Conclusions

In relation to the objectives of this mid-term review, the review found the project to be **relevant in the context of TI's global strategy, as well as in the contexts of targeted countries, given the omnipresent impunity for high-level corruption,** exacerbated in most countries with tailor-made laws that enable and sustain corruption. As regards the project's relevance in relation to the larger long-term regional programme in the Western Balkans and Turkey, the project is a continuation of the work carried out in previous years – the National Integrity Systems Assessments and the research of capture-prone sectors in targeted countries, yet in the absence of a longer-term regional vision and strategy. Hence, t**he regional approach in this specific region seems to be rather donor-driven**, which is a consequence of TI's internal structure. Namely, the movement is a rather loose network operating globally, where individual Chapters are independent organisations deciding autonomously on their own priorities. Consequently, TI currently lacks both the infrastructure and the processes to develop regional strategies. While beyond the scope of this review, it is the evaluator's opinion that this broader organisational development issue should be considered seriously by both TI-S and the National Chapters. Having a genuinely regional approach might have a positive impact in terms of amplifying the results of the work of individual organisations, as well as structured knowledge- and experience-sharing. At the same time, regional projects would be less donor-driven.

In terms of **project design**, the challenges that the project has been facing during implementation are, on the one hand, the result of **poorly worded two-levelled outcome statements, which are not well connected to the project's outputs and activities**, making them difficult to follow and monitor from the management perspective. Similarly, in the design phase, the project's assumptions were not treated as risks to be monitored and mitigated, which added to the confusion as to what the project is really trying to achieve. However, this issue of poor wording can be easily rectified, as suggested in the relevant parts of the review, with no consequence to the project's overall purpose. The second, **more serious issue in the project design was the fact that this research-heavy project did not have a very clear definition of what it is researching exactly, but rather made that definition one of the project's outputs**. As a result of this project-design decision, the project operated with three different definitions of 'grand corruption', entailing constant revisions of the work already conducted. This had serious negative effects on chapter-staff motivation, resulting in the delays in delivering cases for review and in lower-than-expected quality of deliverables, which meant more revisions. Additionally, the Chapters struggled with obtaining data, as official data is of low quality and seldomly publicly available, which ensued gathering and triangulating data from primary sources. Hence, **the 'definition issue' accompanied by the lack of publicly available verified data is the main cause of delays in implementation. This negatively affected project efficiency, which was aggravated by the fact that the project did not have a coordinator in the period between February and August 2019.**

Despite these challenges, in countries where Chapters have access to institutional decision-makers, **they were able to utilize the data of their research in various working groups they are involved in, yet with still uncertain outcomes of their efforts in terms of implementation**. Where access to decision-makers is difficult or impossible, Chapters resorted to building partnerships with CSOs, media, academics, opposition politicians, which **in some cases resulted in synergies, while in others it represents an investment that is expected to be well rewarded once the project moves to its advocacy phase**. In TI-S, on the other hand, a rigorous review process of the cases submitted by Chapters is implemented, followed by external fact-checking, editing, libel-checking and translating of the selected cases to ensure quality. While lengthy, **the process ensures that the cases that will be part of the publicly available databases present strong evidence to anyone who wishes to pursue the issue of high-level corruption and tailor-made laws** in target countries. The databases, containing

the first consignment of cases, are expected to become publicly available during May 2020. In relation to **advocacy activities ahead of the project, they will have to be carefully reconsidered, taking into account the expected disinterest of media and the public in light of the COVID-19 crisis, as well as in light of lockdowns, preventing face-to-face gatherings. Additionally, the project still has to devise strategies on message development as well as to produce national and regional reports stemming from the research.** In light of the amount of work ahead of them, and taking into account the COVID-19 pandemic, **the reviewer recommends a three to six month long no-cost extension period**, to enable the project to reach its targets and objectives.

In terms of efficiency in project management, the main issue was the **gap in the position of project coordinator, which seriously affected overall project management, while the delay in implementing project activities resulted in relatively high levels of underspending** – only 32% of the project budget was spent in the first 14 months of project implementation. In terms of the number of staff assigned to the project and their time allocations**, the reviewer finds that they would have been adequate had the project not encountered so many issues with the definition of grand corruption**. Additionally, the MEL officer's role in project monitoring was inadequately planned for structural reasons, also reflected in their minimal time allocation, while TI-S' research coordinator's allocation has been reduced unjustifiably in relation to this project. The problems with the definition were the main cause why additional staff and overtime had to be resorted to, both in TI-S and in Chapters. In relation to capacities, the reviewer was surprised to learn how little information TI-S supporting staff had on the overall workloads and staffing structures of chapters, beyond the re-accreditation process taking place every three years. This is also related to the structure of the movement and the autonomy of chapters, accompanied by overloads at both ends, hindering regular touching base and regular updates. Yet this also hinders TI-S in providing more tailor-made support to chapters**. If, indeed, TI-S wants to provide stronger and tailor-made support to Chapters, it should carefully examine its own capacities to do so, and then consider carrying out a capacity and needs' assessment of Chapters beyond the re-accreditation processes. At the same time, for the remainder of this project, the one-on-one support provision in terms of project management, case reviews and research reports preparation should be maintained.**

With regard to **prospects of sustainability, the reviewer finds them to be relatively strong, yet very contingent on investing maximal efforts** both in Chapters and in TI-S, to speed up case reviews and fill the databases, and well as on developing appropriate messages for different audiences, communicated through appropriate channels. This will require more creativity in light of the COVID-19 crisis and its immediate effects as well as the aftermath in relation to the inevitable economic crisis the world will be facing. Most Chapters are willing to continue providing data for the databases beyond the implementation period. Additionally, a less demanding database to track corruption in corruption-prone sectors is planned in the follow-up project, but **TI-S will need to devise a strategy on how the current databases will be updated beyond project implementation period, at least in relation to on-going trials for high-level corruption. It would be prudent to plan for these updates in the follow-up project as well.**

Finally, **sustainability will also depend on the extent to which DG NEAR and EU Delegations in target countries will effectively use the results of the project's outputs in their interactions with governments of the target countries**. *Furthermore,* ***the European Parliament and relevant parliamentary bodies, including country rapporteurs,*** *should not be neglected in devising advocacy strategies and outreach activities in the upcoming implementation phase. TI's EU office should also be used as a resource in this sense.*

8. Lessons Learnt and Recommendations

8.1. Lessons Learnt

The key lessons learnt, elaborated in the previous chapters, and segmented into those related to process and those related to the content, are listed below. The evaluator hopes they will be carefully considered and taken forward by everyone involved in project development, implementation and monitoring.

Process-related lessons learnt:

1. A multitude of actors with unclear responsibilities and mandates, in tight time-frames increase the likelihood of designing an incoherent project proposal with unrealistic expected outcomes;
2. TI needs to be more assertive in negotiations with donors in terms of realistic expectations vis-à-vis political and social circumstances in each country and the capacities of its chapters;
3. Chapters need to be more involved in the project design throughout the entire planning process;
4. Chapters need to be more attentive when signing off on project activities and targets;
5. Segmenting target groups facilitates understanding of the project theory of change;
6. Lengthy recruitment procedures require back-up plans to ensure smooth project implementation;
7. Lack of mechanisms to enforce timely delivery of outputs endanger project's effectiveness and efficiency, and represent a reputation risk for the implementers;
8. MEL department needs to be involved more strongly in project planning and in providing regular support and oversight in monitoring during implementation. This requires adequate staff numbers and adequate time allocations in budgets;
9. Group on-line discussions to solve issues that emerge in implementation are not the most effective method of problem-solving;
10. Multiple topics of regional gatherings limit the absorption capacities of participants;

Content-related lessons learnt:

11. TI needs to be clear about what it wants to achieve in the region and design activities in line with this vision – this requires planning at (sub)regional level;
12. All implementers need to understand clearly how EC's requests and expectations in directly funded projects fit into the bigger picture the EC is trying to influence, beyond publicly available information;
13. Research-heavy projects need to be clear about what they are researching prior to project implementation
14. Official, publicly available data in the region is scarce – future research projects must take this into account in planning the timelines for projects;
15. Legal definitions are not necessarily applicable for applied social research;
16. Despite many similarities, individual country circumstances differ, and "one size does not fit all" – activities and targets should be adjusted to the specificities of each country.

8.2. Recommendations

The recommendations provided below relate to: (1) assisting in more efficient and effective project implementation; (2) enhancing current project management; (3) assisting in planning, designing and implementing upcoming projects, taking into account the identified lessons learnt; and (4) strengthening the regional aspects of TI's work. All, but the last set of recommendations are also segmented according to the addressee, while the final set of recommendations on strengthening the regional aspect is addressed simultaneously at TI-S and National Chapters. Additionally,

recommendations related to the implementation of the current project are accompanied by a suggested time-frame.

8.2.1. Recommendations for more effective and efficient project implementation in the remaining period

Recommendations to TI-S and National Chapters:

Recommendation	Addressee	Time-frame
1. Shift into a **higher gear of project implementation**, with a strong commitment of Chapters to deliver outputs within the agreed timelines, and at the expected level of quality: 1.1. Continue with case reviews and with populating the databases, 1.2. Begin working on national reports, based on the cases selected for the databases so far;	Chapters	Immediately
2. In order to **speed up the case-review process**, in addition to the existing template for case selection, TI-S research and legal advisors should **develop a check-list of criteria that cases need to fulfil** prior to submitting new cases for review;	TI-S	Immediately
3. Based on lessons learnt so far, Chapters should **propose what value each country can contribute to the overall target values on indicators** for GC and TML cases, making sure they are realistic, yet ambitious;	Chapters	Immediately after MTR meeting
4. Programme coordinator, research and regional advisor should assess these proposals, revise if necessary, in communication with chapters, and define the final proposed targets in terms of the number of cases to be included in the databases.	TI-S	By end of May 2020
5. Use Turkey as an example of how to begin placing the research findings into the public sphere ahead of launching the advocacy phase of the project;	TI-S Chapters	Last part of the MTR meeting
6. Check cases in ALACs in individual countries for: - potential new cases, - potential overlapping cases to illustrate impact of corruption on ordinary citizens' lives, and - inspiration for contents of planned documentaries;	Chapters	June 2020 onwards
7. Continue with exploiting opportunities to use findings as they come up in individual countries, to further the goals of the project;	Chapters	Continuously
8. Maintain and strengthen cooperation opportunities with other stakeholders;		Continuously

9. **Devise strategies to mitigate COVID-19** induced lack of media and publics' attention:		
9.1. **prepare individual country proposals** on activities, tools, technologies and messages	Chapters	By mid-June 2020
9.2. analyse and cluster proposals	TI-S (Programme Coordinator and Communications Team)	By mid-July 2020
9.3. organise a well-structured and well-facilitated 2-day issue focused **on-line regional meeting** to present and agree on clusters of activities, tools and messages. The meeting should result in: - **redesigned advocacy activities** that include infographics and other types of visually appealing and easily understandable information; - **communication tools and technologies** to be used to deliver messages; - **strong draft messages** that resonate well in each country, adapted according to the type of audiences (general public, investigative journalists/media, CSOs working on good governance issues, other CSOs, researchers and academia, national-level decision-makers, members of the opposition, EC, European Delegations, European Parliament, MEP - country rapporteurs, member-states' embassies) - for the general public and the media, consider developing messages that would point to the effects of corrupt behaviour on public health systems and their lack of readiness to handle the pandemic;	TI-S Chapters	By end July 2020

8.2.2. Recommendations for enhancing project management

Recommendations to TI-S:

Recommendation	Time-frame
1. Maintain **one-on-one exchanges**, alternating weekly between programme coordinator, research and legal advisors and communications adviser to: - solve day-to-day implementation and administrative issues (e.g. belated reports, delivery of MEL matrices, delivery of lists of cases and laws reviewed, regular touching-base)	June 2020 onwards

- support timely delivery of high-quality products, - fully develop messages for and outreach advocacy activities;	
2. Integrate MEL approach into project management:	
2.1. adjust the project's MEL matrix	Immediately upon donor's approval of changes to log frame
2.2. support Chapters in designing national-level monitoring matrices	By end of September 2020
2.3. regularly gather monitoring data from Chapters	Monthly as of October 2020
2.4. support programme coordinator in overall project monitoring and reporting;	Monthly as of October 2020
3. **Adjust reporting template** for Chapters and **include MEL matrix** as an obligatory part of Chapters' narrative reports, including **lists of potential cases** reviewed and dismissed at national levels;	End of June 2020
4. Reach an agreement with the donor as soon as possible on suggested revisions to the Logical framework, including the revised targets for each country;	End of June 2020
5. Submit a request for a three to six months-long no-cost extension, accompanied by request for budget reallocations: - add fact-checking, editing, libel-checking and translation of database material into the budget - if possible, reallocate part of the unspent amount the cost of human resources during no-cost extension.	End of June 2020
6. Pay attention to the structure and number of topics covered in regional meetings to ensure participants can absorb the contents – "less is more";	Continuously
7. Ensure that regional meetings are well facilitated – use either external or internal experienced facilitators to lead the process towards intended goals. Facilitators should be broadly knowledgeable of the contents and project, yet not directly included in implementation; persons included in project implementation should not facilitate meetings;	Whenever possible
8. Assign programme coordinator with **adequate managerial authority** *vis-à-vis* both content and process-related issues;	As soon as possible, given TI-S' internal restructuring processes

Recommendations to DG NEAR:

- Review and approve suggested logical framework revisions - they do not impact the basic purpose of the Action, yet enable easier monitoring of the project's progress and easier assessment of its overall success;
- Approve a three to six month long no-cost extension to the project to enable effective implementation of the remainder of project activities, in light of delays in implementation that will be exacerbated by the COVID-19 crisis;
- Consider organising debriefing sessions with country desk officers towards the end of the project implementation period, to enable researchers to provide more detailed information
- Use project's findings extensively at the level of the EC and EU Delegations to put additional pressure on governments to reform;

8.2.3. Recommendations to assist in planning, designing and implementing upcoming projects

Recommendations to TI-S:

- The process of planning and developing projects needs to be clearly outlined according to phases. The process should include:
    - Information which functions/departments across TI-S are included at what stage of project development, and what type of input they provide in each stage;
    - Information on whose input among different teams and hierarchies within TI-S and at what stage is obligatory to be included in the project design;
    - Clear lines of responsibility - designating person(s) with a mandate to lead the process and produce a coherent proposal;
- MEL should be fully integrated into all phases of project planning, monitoring data collection and overall project implementation:
    - MEL unit should be strengthened in terms of increased human resources
    - MEL staff should regularly assess the proposal's coherence and logical framework; for larger/more complex projects conduct an ex-ante assessment of the project's feasibility and coherence;
    - MEL staff should be directly involved in gathering monitoring data and assisting project coordinators/managers in monitoring the project's overall progress;
    - Chapters need to understand the contribution and value of the MEL approach to project effectiveness and overall organisational development.
- Plan for and allow more time to assess coherence of projects with (1) TI's strategy, (2) Chapters' capacities and inputs, and (3) critically appraised donor preferences;
- The regional advisor should explore options for strengthening strategic engagement with DG NEAR, beyond the project team;
- TI-S' support to Chapters throughout the project should be on a regular one-on-one basis, while group online discussions during implementation should be used only for strategic decision-making at the project level;
- When engaging in interventions that rely heavily on research to produce evidence, clear definitions of what is being researched need to be in place prior to commencing with research. They should be the preconditions for the beginning of project implementation.
    - When researching social phenomena, the appropriateness of the use of legal definitions needs to be critically assessed,
    - If research is relying on a previously applied methodology, careful consideration should be given to assessing the need for methodological adjustments to take into account the

changed circumstances. To the extent possible, they should already be drafted in the proposals, with just methodological fine-tuning (i.e. exact research questions and data collection methods) planned for at the beginning of the project implementation period. The chosen definitions and methodology should not be changing in the course of the research;

- Key stakeholders in the proposals need to be better segmented and an approach to each group needs to be better elaborated, to:
  - design well-targeted activities,
  - contribute to the coherent understanding of the project's theory of change;

At the systemic level, TI-S should develop mechanisms that:

- Enable TI-S, in the role of project coordinator, to enforce accountability in terms of project requirements related to timelines and quality of deliverables;
- Ensure back-up options for situations where essential staff positions are vacant;
- Initiate new recruitment as soon as possible and shorten the recruitment process to ensure efficient in-person hand-overs, once positions are filled;
- Provide easy access to institutional memory and knowledge-base to new staff members.

Recommendations to chapters/partner organisations

- Chapter leadership/project coordinators need to find the time to carefully review the final draft proposals including the Logical Framework, outcome and output statements, and indicators and targets;
- Initiate and engage in more frequent individual or sub-regional exchanges to exchange experiences, and get support/inspiration as to how to approach a problem or an issue encountered in project implementation.
- Integrate MEL approach into project implementation and reporting at the national level as well.

Recommendations to DG NEAR

- provide as much background information as possible to project implementers, beyond what is publicly available information, to ensure their thorough understanding of the underlying purpose of requests coming from DG NEAR:
  - consider enabling occasional exchanges of TI's regional advisor and programme coordinator with decision-making levels at DG NEAR to ensure a better alignment of DG NEAR's needs and funded actions' contribution to the broader strategy of enlargement;
- assess the coherence of requests from different stakeholders within the EC, prior to sending them to the implementers;
- allow adequate time-frames for implementers to respond to these requests;
- in the project approval phase, be realistic as to what can be achieved by CSOs operating in politically unfavourable circumstances, and critically assess the logical framework submitted.

8.2.4. Recommendations for strengthening regional aspects of projects

- **Facilitate regional exchange by means of available online platforms** (e.g. Sharepoint, Teams, Yammer). It could be used as a repository of different types of outputs produced by the Chapters in different projects they are implementing, including the current one (e.g. research, policy memos/briefs, video material, etc.) and serving several purposes:

- updating colleagues and learning what others are doing,
- recognising areas where joint actions might amplify results,
- finding inspiration,
- recognising opportunities for synergies and joint project development,
- discussing future joint projects in all stages of development.
- acting as a forum where Chapters could ask questions and seek support from one another in solving day-to-day issues.

- TI-S should initially facilitate the creation of such a platform, but it should be the responsibility of Chapters to fill it with contents voluntarily, should they find it useful.
- TI-S and Chapters should **invest time in seriously considering the potential benefits and shortcomings of developing a regional strategy**:
  - Use opportunities provided by the current process of developing the movement's global 2030 strategy
  - In preparation of this process, the regional advisor should develop a process for gathering input from Chapters on what they see as benefits and obstacles of such an approach, and what they see as strongest areas of regional cooperation programmatically;
  - Following this initial stage, a joint planning session should be held, where the analysed inputs would be presented and a decision on whether or not to proceed with developing a regional strategy would be reached;
  - If the decision is to go ahead with the regional strategy development, a proper strategic planning session should be organised by TI-S, and its results should be the basis for future (sub)regional programming and proposal development, including the one currently in the development stage.
- Instead of pushing all Chapters from the same region into one multi-country project, consider developing sub-regional approaches - they have the potential to (1) multiply the positive effects across state lines, (2) strengthen institutional relationships between Chapters of the region, and (3) better balance donor expectations with Chapters' interests and capacities;
  - These could be based on:
    - tracking information on identified corrupt individuals and/or power networks operating across state boundaries in the region;
    - observed country similarities, such as: (1) similar levels of advancement in the negotiations process and similar EC recommendations (e.g. North Macedonia and Albania); (2) similarities in sectors identified as being more corruption-prone; (3) authoritarian characteristics of Governments and higher proportions of tailor-made laws (e.g. Serbia and Turkey); (4) dysfunctionalities of justice systems in prosecuting corruption in dysfunctional states (e.g. Kosovo and Bosnia-Herzegovina), etc.
- **Consider carrying out a capacity and needs' assessment of Chapters beyond the re-accreditation processes**, to enable developing tailor-made support activities, with the aim of balancing Chapters' capacities, to the extent possible:
  - Instead of large gatherings, consider developing mentoring or coaching programs in TI-S for individual Chapter members, based on recognised areas of professional development,
  - Explore whether Chapters would be willing to host other Chapters' staff for a period of time, for the first-hand experience in an area of Chapter's development need. Support such peer-to-peer exchanges to the maximum extent possible.
- When planning regional projects, invest in a regional meeting of adequate duration, rather than one-on-one discussions with chapters, to:

- contribute to the coherence of understanding of the project's purpose,
- create a stronger sense of ownership among chapters,
- be better aligned to individual country circumstances and Chapters' preferences and capacities;
- if significant changes in later phases of project development occur, as a result of the process of negotiations with the donor, organise another regional meeting to properly assess changes in relation to Chapters' interest, capacities and individual country circumstances.

- Strengthened regional aspects will require planning and budgeting for more frequent regional gatherings in proposals. If Chapters agree to strengthen the regional aspect, they also need to find the time for more regional meetings. The meetings should be well structured and well facilitated and be focused on one to maximum of two issues.

Appendix 1 - Evaluation Questions

Relevance:

1. How does this project fit the broader context of the fight against corruption in the context of TI's strategic priorities?
2. To what extent is the project in line with National Chapters' strategic priorities?
3. How well are project objectives reflecting what TI is trying to achieve?
4. Have key stakeholders/target groups been identified properly in the project proposal, in relation to the objectives, outputs and activities?
5. To what extent are activities and outputs of the project consistent with the project goals and objectives?
6. To what extent are the initial assumptions that underpin the project design still valid?

Effectiveness

7. How coherent is the understanding of the project's theory of change among implementing partners?
8. What have been the project's major accomplishments so far?
9. What is the likelihood of achieving project objectives by the end of the implementation period? What are the major factors influencing the achievement or non-achievement of objectives?
    a. which specific approaches proved successful, and which did not?
    b. which risks have been identified in the course of implementation and which mitigation measures have been designed? What does it mean in terms of the remaining project implementation period and in terms of future planning and programming?
10. What type and level of support did TI-S' project team provide to the National Chapters and partners in implementing activities?
    a. How useful was this support?
    b. Was the support provided equally/in line with needs and contexts?
    c. What needs to be added or improved in the remaining implementation period?
    d. What are the levels of capacities of chapters/partners to absorb TI-S' support?
11. What types of cooperations have been developed in the course of project implementation and how have they contributed to the project?
12. Were any synergies with external actors achieved and how have these contributed to the project and/or added value in national/international contexts?

Efficiency:

13. How efficient was the project planning phase? Which elements of the planning process work well, and which need to be changed?
14. To what extent and how have Chapters been involved in project design? How were different needs and contexts embedded in the project design? Was this approach successful? What needs to be taken into consideration in future project planning?
15. Is the project being implemented according to plan? If not, why and what will be the repercussions in terms of project end-date?
16. Is there a need to adjust project activities/introduce new ones? If so, why?
17. What level of resources have been engaged in project implementation in TI-S and in partner organisations? Were they sufficient and used effectively to achieve project outputs in the first year of the project? Are they sufficient for the remaining period? If not, what needs to be improved?
18. Is there a need for budget reallocations in the upcoming period? How would they contribute to achieving objectives?

19. What was the level and quality of communication and cooperation on project implementation, and what could be done to improve it:
    a. in TI-S,
    b. between TI-S and partner organisations;
    c. in partner organisations,
    d. among national organisations?
20. Which risks to implementation were identified? How well were they managed, in TI-S and in partner organisations? Were there any unrecognised risks?
21. How has the MEL project approach supported the learning aspect of the project? How useful is it? Was it adjusting/ developing where appropriate?
22. What is the level of implementing partners' capacity to deliver all project outputs?
23. How do partners' capacities contribute to achieving objectives?
24. What, if any, type of additional capacities, resources and support are required to ensure successful completion of project in TI-S and in implementing partner organisations?

Sustainability:

25. Which benefits will the project achieve, and how will they continue to have a positive impact beyond the implementation period?
26. Which elements of the current approach should be used in future planning?
27. Which activities are likely to continue post-current funding? Have resources already been secured/plans being put in place?
28. Which activities and/or cooperation are taking place/are planned in the next phase to ensure a higher likelihood of achieving sustainability beyond project implementation period?
29. How do the partners' strategic approaches and levels of capacities contribute to increased sustainability?

Appendix 2 – List of interviewees and dates of interviews

1. [redacted] TI-S Program Coordinator Western Balkans and Turkey – 24 March 2020
2. [redacted] TI-S Research & Knowledge Coordinator – 25 March 2020
3. [redacted] TI-S Regional Advisor SEE – 24 March 2020
4. [redacted], TI Bosnia-Herzegovina, project coordinator – 26 March 2020
5. [redacted] legal expert and [redacted] project coordinator, TI Macedonia – 26 March 2020
6. [redacted] TI Kosovo, project coordinator – 26 March 2020
7. [redacted] TI Serbia, lead researcher – 26 March 2020
8. [redacted] TI Turkey, project coordinator – 27 March 2020
9. [redacted] MANS, Montenegro project coordinator – 27 March 2020
10. [redacted] IDM Albania, research coordinator – 27 March 2020
11. [redacted] (DG NEAR) program coordinator – 27 March 2020

Appendix 3 - Coding Plan

Code frame	Codes
Relevance	TI's intent/Theory of change Project design approach Logframe logic Assumptions Broader fitting of project – global, regional, national Stakeholders
Effectiveness	Accomplishments Challenges Factors of (non) achievement Structural issues Synergies and cooperation TI-S support
Efficiency	Project management Communication and coordination Human resources and workload allocations Structural issues MEL No-cost extension Budgetary reallocations
Sustainability	
Lessons learnt	