TRANSPARENCY INTERNATIONAL

2020 STRATEGY LEARNING AND SYSTEMATIC REVIEW

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Executive summary

In 2015 Transparency International (TI) adopted a new global strategy *Together against corruption*, covering the period 2015-2020. The strategy covers three strategic priorities, for each of which a number of commitments are made. As the strategic period is coming to an end, TI commissioned a systematic review of the evaluations and learning reviews conducted during the period 2015-2019. The aim of the review was to extract the lessons learnt with the aim to inform the development of the next strategy for the Movement. This report describes the main findings of the systematic review and identifies potential case-studies.

The review found significant progress against commitment 1.1 *Creating demand for accountability, and empowering action*, with a strong emphasis on awareness raising at community level. This commitment reflects the core business of many National Chapters (NCs). There is, however, a need to strengthen the focus on and involvement of engagement of vulnerable and marginalised groups, as well as a more consistent application of a gender perspective. Furthermore, there is an opportunity to explore and scale up the use of social media.

The evaluations and learning reviews include a wealth of examples that highlight progress against commitment 1.2 *Engaging partners and inspiring leaders*, in particular with civil society partners, public sectors partners, as well as private sector partners. In case of the latter, however, many initiatives tend to be in an earlier stage of development. Collaboration with other types of partners is also visible, albeit less prominent, including collaboration with media; universities and research partners; ombudsman and anti-corruption agencies; politicians and Members of Parliament; UN agencies; and donors. The body of evidence does not include examples of working with Faith-Based Organisations (FBOs), trade unions and banks. This is something that may need to be explored in the next strategy.

The review found some examples of progress against commitment 1.3 *Protecting anti-corruption activists,* but these are less prominent in the body of evidence reviewed. The examples show a focus on securing better legal protection of activists as well as the provision of legal advice.

The body of evidence reviewed confirms that most NCs respond to commitment 2.1 *Promoting prevention and enforcing anti-corruption standards* as it constitutes the core of their work. The report highlights progress in the application of a range of tested methodologies or processes, including Integrity Pacts, BOT, TRAC, and BICA. The report also explores less prominent approaches, including SDG16 parallel reporting, SNOIE and anti-corruption in the humanitarian sector. In addition to the application of tested methodologies and processes, the report also explores the strengths and weaknesses of TI's approach to advocacy in general. It highlights the opportunity to develop a more consistent approach to advocacy.

The review found that progress against commitment 2.2 *Achieving justice: ending impunity for corruption* is more hesitant, reflecting its more challenging and sensitive nature. The review recommends to continue research and debate with regard to commitment 2.2.

During the period 2015-2020 TI conducted a significant number of evaluations and learning reviews, which reflect commitment 3.1 *Sharing what works to stop corruption*. The review observes, however, that the nature and utility of the evaluations and reviews vary significantly and that the level of analysis is often insufficient. It makes recommendations to strengthen future evaluations and learning reviews, and to optimise the opportunities for sharing and learning.

The focus of commitment 3.2 *Building a sustainable movement* is mainly on capacity development, management and governance. The systematic review identifies recurring capacity gaps across a range of generic domains such as advocacy, building relationships with private sector partners, communication, fund-raising, M&E, research and project management.

The focus of commitment 3.3 *Ensuring the relevance of our movement* is on new organisational models; the presence and relevance in strategic locations around the world; and the added value of TI as a global movement. The report recommends to continue to explore how technical networks can contribute to the establishment of a truly distributed networks, thereby increasing the agility of the Movement.

Chapter 3 of the report looks across the three strategy priorities. It reflects on the importance of synergies across the three priorities, emphasising the need to look at the total, not just the three priorities and commitments in isolation. It makes a number of recommendations for consideration when developing the next global strategy, including the development of an overarching Theory of Change; a more consistent mapping of stakeholders TI aims to affect; and the development of an overarching results-framework, thereby facilitating communication about TI's work and increasing its fund-raising potential.

Acronyms

ACA	Anti-Corruption Agency
ACP	Anti-Corruption Programme (one of the three TRAC dimensions)
ALAC	Advocacy and Legal Advice Centre
BICA	Business Integrity Country Agenda
BOT	Beneficial Ownership Transparency
BRIC	Brazil, Russia, India and China
CBC	Country-by-Country Reporting (one of the three TRAC dimensions)
CREATE	Collective Resolution to Enhance Accountability and Transparency in Emergencies
CSR	Corporate Social Responsibility
CSO	Civil Society Organisation
DG ECHO	Directorate General for European Civil Protection and Humanitarian Aid Operations
DSP	Defence and Security Programme
FBO	Faith Based Organisation
GACC	Global Anti-Corruption Consortium
GCF	Green Climate Fund
GII	Ghana Integrity Initiative
GTNI	Global Thematic Network Initiative
HAIP	Humanitarian Aid Integrity Programme
MINT	Mexico, Indonesia, Nigeria, and Turkey
MIS	Management Information System
NC	National Chapter
NAG	National Advisory Group
NIS	National Integrity System
OCCRP	Organized Crime and Corruption Reporting Project
OT	Organisational Transparency (one of the three TRAC dimensions)
PHP	Pharmaceutical and Healthcare Programme
RGFI	Reducing Emissions from Deforestation and Forest Degradation Governance and Finance Integrity Project
SABL	Special Agricultural Business Lease
SNOIE	Standardised External Independent Monitoring System
TI	Transparency International
TI NC	Transparency International National Chapter
TI-S	Transparency International Secretariat
TRAC	Transparency in Corporate Reporting
UNDP	United Nations Development Programme
UNODC	United Nations Office on Drugs and Crime
VNR	Voluntary National Review

1   Introduction

1.1   Background

In 2015 Transparency International (TI) adopted a new Strategy *Together against corruption*, which covers the period from 2015 until 2020 (Transparency International 2015b).

The strategy identifies three *strategic priorities*:

1. People and partners.
2. Prevention, enforcement and justice.
3. Strong movement.

For each of the *strategic* priorities, the strategy lists a number of *commitments* which reflect the change TI aims to bring about during the period 2015-2020:

Together against corruption Strategy 2015-2020		
PRIORITY I: People and partners	**PRIORITY II:** Prevention, enforcement and justice	**PRIORITY III:** Strong Movement
Commitments: - Creating demand for accountability, and empowering action - Engaging partners and inspiring leaders - Protecting anti-corruption activists	**Commitments:** - Promotion, prevention and enforcing anti-corruption standards - Achieving justice: ending impunity for corruption	**Commitments:** - Sharing what works to stop corruption - Building a sustainable Movement - Ensuring the relevance of our Movement

Table 1: TI strategic priorities and commitments

For each commitment the strategy describes the *actions* TI aims to undertake during the course of the strategic period in order to bring about the desired change. The *strategic priorities, commitments* and *actions* are summarised in Annex I.

As the current strategic period is coming to an end, TI has commissioned a systematic review of the evaluations and learning reviews conducted during the period 2015-2019. The aim of the review is to extract the lessons learnt in order to inform the development of the next strategy of the Movement.

1.2   Objectives of the systematic review

The Terms of Reference for this systematic review state the following objectives:

- Review all project and programme evaluations and learning reviews implemented in TI-S from January 2015 to October 2019;
- Conduct a systematic review;
- Extract the lessons learned concerning the committed achievements in TI's 2020 Strategy – Together Against Corruption.

The expected output is a consolidated report that 1) maps the lessons learnt against the strategic priorities and commitments made in TI's Strategy 2020 and 2) identifies the most relevant case studies.

1.3 Scope

This document is informed by a review of TI's Strategy 2020 *Together against corruption*, the *Implementation Plan* for the International Secretariat (Transparency International 2016), the *Monitoring* Guide (Caldeira and Werner 2015), and a total of 48 evaluation reports, learning reviews and project reports. The details of the documents reviewed are summarised in Annex II.

1.4 Methodology

To extract the lessons learnt from the evaluation and learning review reports, the key content of each of the documents reviewed was mapped against the strategic priorities and commitments identified in the TI's Strategy 2020. To that effect the documents were uploaded and coded in NVIVO.

The three *strategic priorities* and corresponding *commitments* were used as the starting point for the coding structure. As the content of the documents was analysed additional 'nodes' were identified. Some of these could be grouped as 'child-nodes' under the existing nodes, while others were entirely new and/or cross-cutting. This iterative approach allowed for new a/o additional issues to emerge and helped identify issues that were not addressed at all, or not addressed in sufficient detail.

1.5 Limitations

Conducting this systematic review has been a useful exercise, as it extracts and consolidates the key lessons learnt from a large body of evidence, many of which might have dropped off the radar by the time TI's new strategy is being developed. It enables the Movement to pick up on trends that would otherwise remain unnoticed.

Nevertheless, when reading and using this report, it is important to be aware of the following limitations:

- While the 48 reports reviewed provide a picture of a broad range of initiatives implemented during the current strategic cycle, it can never be fully comprehensive. The work of the Movement is likely to cover a wide range of activities that are not necessarily reflected in the 48 reports reviewed and therefore remain invisible in this systematic review
- The quality of the evaluation and learning reviews is mixed. Many reports reviewed are not sufficiently analytical. They often lack the detail and analysis to substantiate some of the conclusions drawn and lesson learnt. It may be that on the ground there is a strong evidence base to support the conclusions and lessons learnt, but from the reports themselves this is not always sufficiently clear. Section 2.3.1 reflects on the quality of the evaluation and learning review reports in more detail.
- From Annex II it is clear that a significant number of reports reviewed refer to programmes and projects carried out during the first few years of the current strategic cycle, some of which are a 'legacy' from the previous strategic period. Progress against the strategic priorities and commitments during the latter years of the current strategic period may therefore be underrepresented.
- Many learning reviews are a consolidation of multiple documents that reflect multiple projects and programmes in a specific sector or thematic area. Consequently, this thematic review runs the risk of becoming a 'review of reviews', without having the opportunity to analyse the original source material.
- The evaluation and learning review reports reviewed were not accompanied by a management response, except one report. It has therefore not been possible to gauge the extent to which key stakeholders in the Movement considers the respective findings and recommendations pertinent.

- Annex III of this report lists a number of potential case studies that TI may wish to follow up. It should be emphasized, however, that the list is based entirely on the (often limited) case-specific evidence reviewed as part of this strategic review. It is therefore advisable to double-check with regional advisors and NCs 1) whether these potential case studies are indeed worthwhile exploring, and 2) whether there are any other case studies that may not have been visible in the body of evidence reviewed.

1.6   Structure of the report

Chapter 2 provides a detailed analysis of the issues arising from the evaluation and learning review reports. It is structured by strategic priority and commitment, as summarised in Table 1 on page 1.

For each commitment the report discusses the main findings from the systematic review, with clear references to the relevant source material and case studies. At the end of each section there is a summary box with examples of significant achievements and contributions to the commitment concerned (specifically for strategic priorities 1 and 2), as well as a box with key recommendations and lessons learnt.

Chapter 3 steps back and looks across the synergy and coherence across the strategic priorities and discusses the implications for the next strategy for the Movement.

Annex I summarises the commitments and proposed actions under each of the three strategic priorities of the TI's Strategy 2020. Annex II lists the documents reviewed as part of this systematic review. And Annex III lists potential case studies that TI may want to explore in more detail.

2   Findings and lessons learnt by Strategic Priority

Chapter 2 explores the findings and lessons learnt under each of the strategic priorities. The findings and lessons learnt for each strategic priority are broken down by commitment (see Table 1 on page 1).

2.1   Strategic priority I: People and partners

Strategic priority I covers the following three commitments:

- **Commitment 1.1:** Creating demand for accountability, and empowering action.
- **Commitment 1.2:** Engaging partners and inspiring leaders.
- **Commitment 1.3:** Protecting anti-corruption activists.

Section 2.1 explores the results generated and lessons learnt under each of these commitments.

2.1.1   Commitment 1.1: Creating demand for accountability, and empowering action

> **THE CHANGE** People around the world denounce corruption and take increased action to confront it, by demanding transparency, accountability and integrity.
>
> **OUR ACTION** We will work with a wide range of people to act to confront corruption, demand accountability and contribute to anti-corruption approaches that are systemic and sustainable.

The activities and results that pertain to commitment 1.1 are very prominent in the body of evidence examined as part of this systematic review. Most of the reported activities focus on awareness raising at community level, either directly or through trained volunteers and/or facilitators. The strong emphasis on commitment 1.1 reflects the core business of many National Chapters (NCs)(ODS 2016).

Community outreach, raising awareness and facilitating engagement in processes of social accountability are naturally context specific. The approach applied is shaped by the issue(s) being addressed, as well as the socio-political and cultural context in which the activities take place. It is therefore not possible to extract a common approach. Nevertheless, the systematic review highlights a number of cross-cutting issues that contribute to the level of effectiveness of different approaches applied:

- In most programme initiatives reviewed, **outreach and awareness raising are part of an integral, multi-level approach** to fighting corruption. The focus of outreach and awareness raising tends to be on citizens' rights, the roles and responsibilities of duty bearers, and on existing processes and opportunities for participation, consultation and grievance in order for citizens to ascertain their rights.

    In many cases, complementary activities take place at multiple levels, including district and national. For example, through the *Reducing Emissions from Deforestation and Forest Degradation Governance and Finance Integrity* Project (RGFI) in Papua New Guinea, and in collaboration with the Advocacy and Legal Advice Centre (ALAC), TI was able to feed information from communities directly into the national-level policy discourse. Similarly, the REDD+ programme in Vietnam was able to escalate locally defined problems to the national-level discourse on developing REDD+ safeguards. This led to tangible results locally when local governments started to address community complaints, as well as nationally when institutional processes of forest finance were made more transparent and inclusive (Pellini 2016).

- Many programme initiatives try to **create space for dialogue between authorities (duty bearers) and communities (rights holders)**. A clear example of this is the LEGEND project in Sierra Leone and Zambia, which organised public forums to provide an opportunity for communities to engage with authorities to share their concerns and find solutions with regard to land tenure (Transparency International Secretariat 2019)

- Depending on the issue(s) being addressed, outreach and awareness raising initiatives may decide to target specific, often **vulnerable or marginalised groups**, e.g. young people, women, indigenous groups, etc. While significant progress has been made with regard to the engagement of young people, the mid-term review of TI's Strategy 2020 highlights that **gender** may not be sufficiently present on the radar of some NCs, which may translate in under-reporting of gender-related issues (Iongh et al. 2018). The mid-term evaluation of the Asia-Pacific programme also reports that progress has been made in gender mainstreaming, but that progress is not consistent across all NCs (Karlberg 2018). This will be further explored in section 2.3.3.

  More recently the Asia Pacific programme has increased its attention to gender in programme planning, implementation and reporting. Building the internal capacity is an important part of this process. In 2019 it reported that it was planning to establish a network of gender focal points to facilitate knowledge exchange. The focus of the network will be on gender inclusiveness in outreach as well as gender sensitivity in programme design (Transparency International 2019a).

  As part of its design, the *Land-Enhancing Governance for Economic Development* project (LEGEND) is more explicit about the specific groups it aims to target, including youth in Liberia, and women in Liberia, Sierra Leone and Zambia (Transparency International Secretariat 2019).

- Notwithstanding the need to focus on specific groups, a number of documents reviewed highlight the need to also ensure **the inclusion of key, influential stakeholders** such as community leaders, religious leaders, CSO representatives, etc, in order to maximise the effectiveness. This will contribute to increased leverage and local ownership.

  While the inclusion of key, influential stakeholders can often be critical for success, it is important to recognise a potential tension. This is clearly reflected in the final report of the LEGEND project which makes the observation that traditional community leaders themselves can be important actors in perpetuating corruption by receiving bribes and giving land to investors. They may be hampered by a lack of knowledge and understanding of existing laws and regulations, as illustrated by the case in Zambia. It highlights the fact that 'communities' often represent a wide range of different groups and sub-groups, each with its own interests (Transparency International Secretariat 2019).

- The body of evidence clearly shows that efforts to facilitate public engagement are more likely to succeed when there are clear and practical **mechanisms to channel citizens' discontent**. Concrete examples of this include the *Brigadas* in Peru (Luft 2016) and the *Linida* project in Indonesia (Schakel 2016). The flipside, however, is that some of these channels may be formalistic and elite-driven resulting in the potential risk of excluding ordinary villagers (Schakel 2016).

- **Consistent and sustained communication** is critical to **raising awareness** at community level. Conventional methods such as brochures, posters, meetings, etc. continue to play a role. Some initiatives have also tried out less common methods, such as the introduction of Community Notice Boards by TI Zambia as part of the *REDD programme* (SDG Lead 2018).

  As part of its communication strategy, the LEGEND project developed a website as a platform to document, visualise and disseminate information on land acquisition, procedures and regulations.

- It is noteworthy that, in the body of evidence reviewed, there is limited reference to the **use of social media** to raise citizens' awareness and facilitate citizens' engagement. Some NCs report the use social media for launching reports or advertising events, but the consistent use of social media for outreach and awareness raising is seldom reported. There are, however, a number of exceptions.

  The *Regional-based approach to NIS assessments in European neighbourhood South* project in Tunisia helped young people to produce videos and new apps, and to use Facebook and Twitter to link with eight Members of Parliament in order to ask questions. The partner organisation I-Watch learnt how to build new relations with Members of Parliament in a more systematic way and succeeded in creating a network of parliamentary allies (Karanasou et al. 2016).

  A survey in Zambia showed a remarkably high percentage of people accessing the website, both in Sierra Leone and in Zambia. Nevertheless, the final report concludes that 'data and technology' alone are not sufficient to engage citizens. Their use needs to be part of a wider programme package. Furthermore, the report highlights that a significant investment of time and expertise is needed for the use of technology to reach its full potential. (Transparency International Secretariat 2019).

  Similarly, the LEGEND project in Liberia focussed on the increasing its online presence through advertising on Facebook. The final report on this project highlights the role of social media in increasing the reach of the project (Transparency International Secretariat 2019).

  And in the Maldives TI launched an online campaign during the elections in 2018, urging the new administration not to make any deals, provide impunity or offer government positions to people with corruption allegations during the formation of the new government and during their term. (Transparency International 2019a).

  Despite these exceptions, it is not surprising that a number of review reports suggest the strengthening of TI's social media strategy across the Movement. Notable exceptions are the *To contribute to effective implementation of anti-corruption policies and practice in government, business and society, 2013-2017* programme in Vietnam (Persson and Tien Dung 2015) and some of the NCs participating in the *Mining for sustainable development* programme (ODS 2018a). According to the reports, both programmes have effectively used social media for raising community awareness, though further detail and numbers that reflect the use and reach are missing.

- To generate momentum and to reach adequate scale in terms of outreach and awareness raising, many of the programmes reviewed involve **networking and collaboration with other NGOs and CSOs**, which will be explored in more detail under commitment 1.2 *engaging partners and inspiring leaders* (see section 2.1.2).
- **Sustainability** of outreach and awareness raising seems to be an area of concern across many of the projects and programmes reviewed. Project and programmes that appear to have a stronger sustainability proposition are those that link into existing mechanisms to channel citizens' discontent (where available) and those that build on existing CSO and NGO networks

The above observations resonate with the external study *From grievance to engagement* by Global Integrity (Florez et al. 2018). The study proposes a generic Theory of Change that can be used as a starting point to design an approach that facilitates citizens' engagement and to translate this into practical action. The Theory of Change needs to be elaborated and adapted in line with the particular context in which a programme is implemented. To optimise citizens' engagement, the study highlights

the need to develop a Theory of Change that reflects the specific characteristics of the context and the selection of issue(s) that people can relate to. It emphasizes the need to unpack and challenge the (often tacit and sometimes overly simplistic) assumptions that underpin the approach to community engagement in a particular setting. This ties in with the observations made in the evaluation of the Open Governance Project (ODS 2016) and the mid-term review of the Asia-Pacific programme (Karlberg 2018), which both concluded that there is scope for countries to innovate in order to increase their reach and more effectively hold decision-makers to account.

Examples of significant achievements and contributions to commitment 1.1:

- The REDD+ programme in Vietnam was able to escalate locally defined problems to the national-level discourse on developing REDD+ safeguards. This led to tangible results locally when local governments started to address community complaints, as well as nationally when institutional processes of forest finance were made more transparent and inclusive.
- Through the RGFI project, TI Papua New Guinea, in collaboration with the Advocacy and Legal Advice Centre (ALAC), was able to feed information from communities directly into the national-level policy discourse. By doing so, it was able to influence policy making using grass-roots evidence.
- In 2018 TI Maldives launched an effective online campaign during the elections, urging the new administration not to make any deals, provide impunity or offer government positions to people with corruption allegations during the formation of the new government and during their term.
- TI programme initiatives like the *Brigadas* in Peru and the *Linida* project in Indonesia are able to provide an opportunity for citizens to channel their discontent by optimising the use of existing mechanisms.
- Through the *Regional-based approach to NIS assessments in European neighbourhood South* project in Tunisia, young people were able to link with eight MPs and ask questions by using videos, news apps, Facebook and Twitter. The partner organisation I-Watch succeeded in building new relations with MPs in a more systematic way and in creating a network of parliamentary allies.

Key recommendations and lessons learnt:

- Strengthen the focus on and involvement and engagement of vulnerable and marginalised groups, by recognising the specific issues that may affect them.
- Ensure the consistent application of a gender lens across NCs.
- Seek the involvement of influential stakeholders in TI's outreach and awareness raising activities to increase leverage and scale, with the caveat that the same stakeholders themselves may be involved in the perpetuation of bribery and corruption.
- Encourage and strengthen the use of a Theory of Change approach to outreach, awareness raising and social accountability that 1) reflects the characteristics of the context and the issue(s) being addressed, and 2) unpacks and explores the underlying assumptions.
- Embed outreach, awareness and social accountability in a broader package that is applied at multiple levels and involves multiple stakeholders.
- Explore and optimise the use of social media in TI's work.
- Strengthen the sustainability proposition by linking into existing mechanisms to channel citizens' discontent where available and appropriate and by building on existing CSO and NGO networks.

2.1.2 Commitment 1.2: Engaging partners and inspiring leaders

> **THE CHANGE** A growing number of key partners and leaders drive anti-corruption progress.
>
> **OUR ACTION** We will work with and promote anti-corruption leaders and leadership, and foster strong partnerships in anti-corruption related fields most relevant to our priorities.

Review of the body of evidence highlights the importance of TI's efforts of working with and mobilising a wide range of partners:

- Unsurprisingly there is **a strong emphasis on working with civil society partners, including local NGOs, CSOs, community groups, unions, etc**. Review of the body of evidence shows that they tend to vary significantly in size, capacity and visibility. Building the capacity of these organisations to hold public and private sector partners to account is therefore often an integral part of TI's approach. In the narrative, many of the evaluation and review reports reviewed refer to significant progress in this area, albeit that the evidence base to make these assertions is often limited. Working with civil society partners and strengthening their capacity is an important part of TI's sustainability proposition.

  Public sector partners, often at multiple levels, constitute another core group targeted by NCs. The evaluation reports tend to speak in generic language when describing the types of public sector partners TI works with, such as environmental services, forestry services, legal departments, etc. Furthermore, it should be recognised that the administrative set-up is usually very country specific.

  The body of evidence reviewed shows how the visibility and reputation of NCs is a critical factor in establishing an effective collaboration with government partners. Their association with the global TI Movement is a critical, enabling factor herein. The collaboration with public sector partners has enabled the organisation to address sectors and business processes that are prone to corruption. Examples of this include TI's work in conservation and forestry (Pellini 2016; SDG Lead 2018; Transparency International 2015a; Universalia Management Group 2019), mining (ODS 2018a) and procurement (Basel Institute on Governance 2015; ODS 2018b).

  The process to achieve the commitment of public sector partners is often context specific. As the evaluation report of the Linida project in Indonesia points out, there is "no magic bullet". In many cases it is a matter of trial and error, using "carrot and stick" (Schakel 2016).

  Nevertheless, there are opportunities to share tested practice and lessons learnt across NCs. To that effect, it would be useful to start mapping the type of public sector partners that TI typically works with and the kind of interventions that are proven to be effective by type of partner.

  Apart from the *type* of public sector partner, an important aspect is the *administrative level* at which the partner operates. An important factor of success seems to be the ability to escalate issues identified at the local or community level, to a higher administrative level (sometimes up to national level), as evidenced by the RGFI project in Vietnam (Pellini 2016).

  Another success factor is the identification of change agents within public sector partners who are prepared to make change from within an administrative (and often bureaucratic) structure, as

evidenced by the RGFI project in Indonesia (Pellini 2016). It highlights the need not to think about administrative structures as homogenous entities.

- **Private sector partners:** Looking at the body of evidence, there are a number of encouraging initiatives to bring private sector partners on board in the fight against corruption. Many of these initiatives are in an early stage of development, trying to raise awareness of business with regard to corruption, such as the programme by TI-S and its partner organisation *Towards Transparency* in Vietnam (Persson and Tien Dung 2015), as well as the work carried out with the logging companies in Papua New Guinea (Pellini 2016). Some initiatives are further advanced and show signs of progress in improving business practice and raising standards.

For many NCs it seems that working on business integrity is a relatively new area and much of the work is still experimental, as highlighted in the mid-term evaluation of TI's Asia-Pacific programme (Karlberg 2018). The evaluation describes progress made by TI Mongolia since the establishment of the Business Ethics Working Group in 2015. The group facilitates dialogue between private sector representatives, public sector representatives, as well as civil society partners. In 2017 it launched an e-learning tool called *Doing business without Bribery* (adapted from TI UK). The evaluation reports that high level meetings and engagements took place in 2018 in preparation of strategic partnerships with private sector partners. The Business Ethics Working Group has developed several position papers and draft policies, on topics such as anti-corruption, gifts and hospitality, and whistleblowing (Transparency International 2017a).

The same evaluation reports that TI Indonesia has been working with the second biggest state-owned company, PT.PLN for several years. The company is now considered one of the most transparent state-owned enterprises in Indonesia (Karlberg 2018).

At regional level some potentially promising progress is made with the signing of an MoU between the ASEAN Corporate Social Responsibility (CSR) Network and TI-S (Karlberg 2018).

Similar observations are made in the mid-term evaluation of the TI Strategy 2020 carried out in 2018, which found that many NCs had established effective relationships with leaders in the private sector and public sectors, but this had not yet translated into existing leaders or public figures becoming anti-corruption champions (Iongh et al. 2018). What is clear from the body of evidence is that working with the private sector continues to be a relatively new area for many NCs that requires a different skills-set and experience. It requires inside knowledge of the way the private sector operates, the key drivers (positive and negative), as well as the ability to identify potential agents of change within the private sector.

Engagement with the private sector is not only important when trying to improve internal business processes. Collaboration with and support of the private sector is also indispensable when trying to bring about changes in legislation, as highlighted in the final evaluation of the *Whistle-blower protection in Europe* project (Smith et al. 2019).

More recently, however, it seems that the introduction of the Business Integrity Country Agenda (BICA) methodology and the Transparency in Corporate Reporting (TRAC) initiatives are giving the engagement with private sector partners a new and clearly focussed push, while at the same time providing NCs with knowledge, skills and tools to engage more effectively with private sector partners (Humboldt-Viadrina Governance Platform 2019; The Governance Group 2019). The BICA and TRAC initiatives will be explored in more detail in 2.2.1.

- **Media:** The majority of programme initiatives seem to have explored how the project or programme has affected the coverage of corruption in the media. Some of the projects and programmes, however, go further and apply a more pro-active media strategy where journalists are being trained and media engagement in key issues and events is sought more proactively.

  The final evaluation of *the regional-based approach to NIS assessments in European neighbourhoods South Phase II* reports many great examples of the potential and importance of working pro-actively with the media. For example, the official Palestinian news agency and the Al-Hayat Al-Jadida newspaper both established investigative reporting units, following training of a group of journalists by the Coalition for Integrity and Accountability (Karanasou et al. 2016).

  Another good example of the potential impact of a more proactive approach is highlighted in the *Learning review: TI's Integrity Pacts for public procurement,* which reports increased media scrutiny as a result of issues identified by 'monitors'. Consequently, the Ministry of Public Works in El Salvador ended up terminating a contract and hiring a new firm to complete a project (Basel Institute on Governance 2015).

  Another example is TI's membership of the Global Anti-Corruption Consortium (GACC). This unique and growing consortium aims to expand global information-sharing between pre-existing networks of investigative journalists, editors, and anti-corruption NGOs. It provides an opportunity for NCs to work with investigative journalists, which is currently taking place in countries such as Brazil, Chile, Peru, Hungary, Lithuania, Madagascar, Montenegro, Nigeria, Portugal, and Zambia. In a number of countries, the collaboration also involves the ALACs. The possibilities to extend the collaboration to countries in the Arab world are being explored. The collaboration is starting to generate key input for advocacy, as illustrated by the production of articles and videos in Madagascar on topics such as corruption in mining and fishing. The possibility to use the information generated by some of the investigations to launch legal action against perpetrators of corruption is being explored in a number of cases, as illustrated by the Troika Laundromat campaign and the Gambia Heist Campaign (Transparency International 2019d, 2020).

  The Asia Pacific programme reports efforts to combine investigative journalism and advocacy. For example, TI Maldives and the Organized Crime and Corruption Reporting Project (OCCRP) cooperated on a case around a multi-million dollar scheme under which dozens of Maldivian islands were leased out to developers without bids and the money then stolen. The OCCRP investigation tracked the deals, finding what was handed out, and tracing it back to the then President Yameen. The expose *Paradise Leased* was published on the OCCRP website six days before the Presidential elections (Transparency International 2019a)

  The importance of media involvement to enhance public scrutiny is also reiterated by the OECD principles for integrity in public procurement (OECD 2009). However, not all projects and programmes reviewed seem to have a pro-active media strategy. At times the media are considered as mere conduits of messages and information, rather than partners. With the arrival of the GACC in particular, however, the balance appears to be shifting towards a more strategic involvement of media in TI's work.

- **Universities and research partners:** Though less conspicuous, a number of NCs report on collaboration and partnerships with universities and research institutes:

The project *To contribute to effective implementation of anti-corruption policies and practice in government, business and society* in Vietnam works with universities to raise awareness among students (Persson and Tien Dung 2015).

As part of the *Linida* project in Indonesia a university is involved in the development of a community information system (Schakel 2016).

The final evaluation of the *Regional-based approach to NIS assessments in European neighbourhood South* project reports on a very fruitful collaboration with a number of universities in the region, in particular with regard to the training of journalists in investigative journalism and reporting, as well as the training of students in the topic of financing political campaigns (Karanasou et al. 2016).

TI-PNG reports how a local university is planning to include the topic of anti-corruption in forest governance in its curriculum (Pellini 2016).

Through the I-ACT project TI has a partnership with Cambridge University to provide chapters working on public procurement data with the necessary tools to make use of such databases. And through a partnership with Leiden University an e-learning course on the use of governance indicators has been developed, with emphasis on monitoring corruption across the SDG framework. The course, which was originally developed for internal use, has since been picked up by the University of Bochum for delivery in Afghanistan and to their Network of Humanitarian Action, as well as by the Mc Gill University in Montreal (Transparency International 2018a, 2019b, 2019c).

The examples above show the potential of working with universities and research institutes to increase the leverage of NCs in their respective countries.

- **Ombudsman and Anti-Corruption Agencies:** As part of the Asia Pacific Programme, a number of NCs work to strengthen existing Anti-Corruption Agencies. In 2016 TI conducted a first round of assessments to assess and benchmark the performance of ACAs, against the backdrop of under-resourcing, and the lack of independence and political support in some countries. The results of the assessment have since been used to work with ACAs in a constructive manner and help them improve (Transparency International 2017c, 2019a).

  In other countries the Ombudsman is identified as an important and influential stakeholder, including in Argentina (Fontana and Rosario 2018), the Netherlands (Smith et al. 2019), Peru (Luft 2016), and the Ukraine (Basel Institute on Governance 2015).

- **Politicians and members of parliament:** Few reports refer to collaboration with politicians and members of parliament.

  The report of the final evaluation of the *Regional-based approach to NIS assessments in European neighbourhood South* project refers to a direct collaboration with political parties and Members of Parliament (Karanasou et al. 2016).

  And at the level of the European Union, TI is providing significant input on specific topics such as Golden Visa (Transparency International 2019b, 2019d), and whistleblowing (see section 2.1.3), reflecting TI's expertise and reputation on these topics. Following publication of a report on Golden Visas by the European Commission, and expert group was set up. TI was invited to attend the expert meeting and to submit a written response to the consultation (Transparency International 2019b).

The Centre for Law and Democracy recognises the importance of working with politicians and suggests the involvement of government representatives from "champion countries" in regional and global advocacy campaigns (Centre for Law and Democracy 2019).

- **UN Agencies:** TI works in partnership with a range of UN agencies, such as with UNDP in Vietnam, and with the United Nations Office on Drugs and Crime (UNODC) in Ghana, Nigeria and Panama. In many cases, these collaborations appear to be ad hoc and have not necessarily been formalised. There are, however, examples where a more strategic approach is pursued:

  In Latin America, opportunities to collaborate more systematically with UN Women are being explored with the aim of supporting the political participation of women. To that effect a pilot was started in Guatemala (Joseph and Fernandes 2018). And in Lebanon the Lebanese Transparency Association became member of the UNDP Global Compact Network (Transparency International 2017b).

  The Asia Pacific programme reports significant steps in the application of the Anti-Corruption Agency initiative (ACA): "TI was a key driver of the Global Expert Group Meeting aimed at strengthening the *Jakarta Principles* for Anti-Corruption Agencies. TI engaged with the co-hosts, Sri Lanka's ACA, UNODC, and UNDP. TI presented the findings and recommendations from our first round of ACA assessments, which provided an opportunity to directly link its research to the on-going global discussions to strengthen the *Jakarta Principles*". (Transparency International 2019a). The ACAs will be discussed in more detail in section 2.2.1.

  And in case of the Siemens Integrity the possibility of applying the BICA (see section 2.2.1) to a Canadian-funded project on Civil Servant Capacity implemented by UNDP is explored (Transparency International 2018b). Based on the documents reviewed, it is not clear whether this approach went ahead.

- **Donors:** Two initiatives reviewed refer specifically to aid integrity and the role of donors as one of the key stakeholders and possible agents of change.

  The *CREATE* project makes a number of recommendations to DG ECHO on how to improve integrity in the humanitarian sector (ODS 2018c), while the final evaluation of the *REDD+ governance and finance integrity for Africa* programme highlights the lack of a more proactive approach to fighting corruption in forestry programmes and the need to engage global donors and institutions in developing governance mechanisms targeting corruption in REDD+ programmes (SDG Lead 2018).

  The Asia Pacific programme highlights the importance of working with donors, while recognising the delicate balance between trying to be independent and effective on the one hand, and having good relationships with both the government and donors on the other (Transparency International 2019a).

  The potential of involving donors as agents of change is recognised by the Centre for Law and Democracy which suggests the creation of 'donors groups' to educate and advocate towards other donors on issues of civic space and anti-corruption (Centre for Law and Democracy 2019).

In most cases reviewed, TI's work does not focus on collaboration with a single type of partner organisation. It usually involves working with **multiple stakeholders and types of partners** at the same time and bringing them together in **multi-stakeholder partnerships** in order to monitor business

processes that are typically susceptible to corruption. Collaboration with multiple partner organisations is usually a first step and prerequisite to create an opportunity to develop and adopt new or improved business processes, such as Integrity Pacts, the Business Integrity Agenda (BICA), Standardised External Independent Monitoring Systems (SNOIE), etc. These will be explored in more detail in section 2.2.1.

Notwithstanding the progress made in facilitating multi-stakeholder partnerships, a recurring observation across many of the evaluation and review reports reviewed is the need to strengthen communication with partner organisations.

What some of the reports reviewed highlight is that organisations a/o companies are not homogenous entities. Working with other stakeholders usually involves working with individuals within those organisations or companies. Identifying agents of change, and building and nurturing these personal relationships requires time and is often critical for success. As a result, it makes working with organisations and companies with a high staff turn-over challenging. Staff turn-over at the level of partner organisations is identified as a stumbling-block in a number of reports reviewed.

Despite the emphasis on working with multiple partners, it is an interesting observation that collaboration with the following types of partner organisations is not or barely visible in body of evidence reviewed:

- **Faith Based Organisations (FBOs)**: Apart from the importance of involving religious leaders in the LINIDA project in Indonesia (Schakel 2016) no reference is made to working with FBOs in the evaluation and review reports reviewed.
- **Trade Unions:** Only the evaluation report of the project *Whistleblowing in Europe: Supporting the agents for change* makes reference to engaging with a trade union by TI Ireland (Unknown 2017).
- **Banks:** While banks have a key role to play in fighting corruption, there seems to be little or no reference to working with banks as agents of change.

Obviously, no hard conclusions can be drawn from this observation, as it may be that existing collaborations with these types of organisations simply have not been reported in the documents reviewed, or that collaboration with these types of stakeholders is considered irrelevant for the projects and programmes concerned. Nevertheless, it may be worthwhile to explore this in more detail, since opportunities for strategic alliances that would leverage TI's work may be missed.

Examples of significant achievements and contributions to commitment 1.2:
- In 2015 TI Mongolia established the Business Ethics Working Group. The group facilitates dialogue between private sector representatives, public sector representatives, as well as civil society partners. In 2017 it launched an e-learning tool called *Doing business without Bribery* (adapted from TI UK). In 2018 high level meetings and engagements took place in preparation of strategic partnerships with private sector partners. The Business Ethics Working Group has developed several position papers and draft policies, on topics such as anti-corruption, gifts and hospitality, and whistleblowing.
- In 2018 the collaboration between the Organized Crime and Corruption Reporting Project (OCCRP) focussed on a case around a multi-million dollar scheme under which dozens of Maldivian islands were leased out to developers without bids and the money then stolen. The OCCRP investigation tracked the deals, finding what was handed out, and tracing it back to the then President Yameen. The expose *Paradise Leased* was published on the OCCRP website six days before the Presidential elections

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- After working with TI Indonesia for several years, PT.PLN, the second biggest state-owned company in Indonesia, is now considered one of the most transparent state-owned enterprises in Indonesia.
- TI Vietnam tested a process for the identification of problems at community level followed by escalating them to national level in a culturally challenging environment. This approach appears to be gaining interest beyond the project area, thereby creating an opportunity for replication and scaling-up.
- In Lebanon investigative journalism units were established by the official Palestinian news agency and the Al-Hayat Al-Jadida newspaper, following training of a group of journalists by the Coalition for Integrity and Accountability

Key recommendations and lessons learnt:
- Consider the possibility of more consistent mapping of partner organisations that NCs collaborate with across the Movement.
- Explore which potential partners are not engaged and the potential opportunities to leverage the impact of TI's work that are missed as a result.
- Consider the application of a more explicit 'actor-based approach' when developing future Theories of Change and explore the implications of such approach for M&E.
- Develop and apply a more consistent way of mapping the type of stakeholders TI works with and use this to analyse what works, what does not work and the lessons learnt.
- Explore and encourage a more systematic way of assessing change in capacity of partner organisations
- Continue to push for effective partnerships with private sector partners, supported by the roll-out of practical tools and methodologies such as BICA and TRAC. Learn from NCs that have been able to make significant inroads in this area and document and disseminate the lessons learnt across the movement.
- Optimise the potential of working with the media by taking a more proactive approach that builds on the lessons learnt by some of the leading NCs and other implementing partners in this area.
- Optimise the potential of working with universities and research institutes in country.
- Document the experiences of the collaboration between TI and UNDP in Lebanon, and TI and UN Women in Guatemala, in order to explore the potential of working with UN agencies in a more strategic way.
- Consider donors not just as sources of funding, but also as potential agents of change.
- Ensure effective communication when working with multiple partners.

2.1.3 Commitment 1.3: Protecting anti-corruption activists

THE CHANGE Greater freedom of action and voice for anti-corruption activists.

OUR ACTION We will defend and support Transparency International activists under threat, stand in solidarity with those whose work to expose corruption puts them at risk, and push back against the limits put on civil society space.

Notwithstanding the importance of commitment 1.3, coverage on the protection of anti-corruption activists is relatively limited in the body of evidence reviewed as part of this systematic review.

Programme initiatives reported with regard to this commitment focus on:

- **Legal protection of whistleblowers:**

  The mid-term evaluation of TI's Asia-Pacific programme reports that TI Cambodia was on the expert group for the *Law on the protection of reporting person* and the *Law on the protection of witness, expert and victims*, which together form the whistleblower protection legislative framework (still in draft). The evaluation participants observed that the expertise brought to the table by TI Cambodia had had a significant positive impact on the quality of the laws (Karlberg 2018). NCs in other countries in the Asia Pacific region are also advocating for policy change with regard to the legal protection of whistleblowers, including the NCs in Cambodia, Mongolia and Sri Lanka (Transparency International 2019a).

  At European level, TI-S instigated the work towards an EU Directive to strengthen legal protection of whistleblowers (Unknown 2017). The EU *Directive on the Protection of Persons Reporting on Breaches of Union Law* was adopted in March 2019. Adoption of the EU Directive has been a very significant step forward as Member States are expected to incorporate the directive into national law. The positive impact of this can be seen at country level. In Estonia, for example, it has changed the dynamics when discussing whistleblowing with private companies. In case of Poland it is closing the door for changes in legislation that would curtail the space and protection of whistleblowers and civil society at large.   (Smith et al. 2019). This example highlights the leverage that can be created when working at multiple administrative levels (including regional) at the same time while optimising the use of knowledge and expertise in a very specific technical and legal area. It speaks to the value added of operating as a Movement where the total is more than the sum of the parts.

  The case studies on France, Ireland, Italy and Lithuania, explored in the evaluation report of the *Whistleblowing in Europe* project, highlight the value and relevance of close collaboration with whistleblowers themselves to advocate for protective legislation (Unknown 2017).

  The review of the BICA Assessment Framework and Methodology reports that the information generated by the application of the tool is informing the development of legislation on the protection of whistleblowers in Malaysia and Kenya (The Governance Group 2019).

  Other examples of TI's role in strengthening whistleblowers' protection take place at institutional level, such as the inclusion of whistleblowers' protection in Integrity Pacts (ODS 2018b) and TI's contribution to the drafting of a policy on the *protection of whistleblowers and witnesses* for the Green Climate Fund (GCF)(Universalia Management Group 2019).

- **Provision of legal advice to whistleblowers:** The body of evidence reviewed indicates that support to whistleblowers is mainly provided through Advocacy and Legal Advice Centres (ALACs). However, little detail is provided regarding the issues dealt with, the types of support provided, the case load, etc. A recent report on the role of ALACs in the Balkans, however, illustrates the importance of ALACs: In one year alone, the ALACs in Bosnia & Herzegovina, Kosovo, Macedonia and Serbia advised a total of 2110 clients on a wide range of issues, such as public administration and procurement, judiciary, education, health and environment. Of those, 708 grievances (34%) were successfully resolved (Transparency International 2019e).

Some of the reports do describe how some ALACs find creative ways to ensure that legal advice is available, in particular in more oppressive contexts. For example, the mid-term evaluation of TI's Strategy 2020 reports that the *Ghana Integrity Initiative* (GII) has established a mobile ALAC system where the ALAC travels to speak with people in rural communities. To ensure that their work through the ALACs does not compromise their access to national policy makers or institutions, they are brokers rather than persecutors filing complaints themselves. They collect the complaints, point the complainants in the direction of the relevant enforcement agencies, and support them if needed or connect them to specialised organisations (Iongh et al. 2018).

The same report describes how the ALAC in Pakistan has adopted a grass-roots level approach in which community members presented petitions to the local government, rather than the ALAC itself. Such a strategy puts the public at the forefront so that the ALAC is not seen as the champion of the anti-corruption movement but rather, as simply supporting a public-driven movement (Iongh et al. 2018).

Outreach activities by TI Zimbabwe include legal support during workshops where grievances can be aired, because it was clear that communities were not comfortable with reporting matters using the formal ALAC process. When conducting workshops on the REDD+ programme in the local communities, an ALAC representative from TI-ZW is present so the people can engage with legal expertise in a discrete manner (SDG Lead 2018).

The preliminary report *Expanding the space for civil society anti-corruption work* by the Centre for Law and Democracy emphasizes the relevance and importance of commitment 1.3 *Protecting anti-corruption activists*. It provides an opportunity to strengthen the collaboration with human rights groups by focussing more broadly on the protection of civic space, including the right to access to information, the right to share information on corruption, as well as the legal protection of anti-corruption activists and whistleblowers. It is an area of work that typically lends itself to a regional approach (Centre for Law and Democracy 2019).

Examples of significant achievements and contributions to commitment 1.3:
- TI Cambodia was on the expert group for the Law on the protection of reporting person and the Law on the protection of witness, expert and victims, which together form the whistleblower protection legislative framework (still in draft). The expertise brought to the table by TI Cambodia has had a significant positive impact on the quality of the laws.
- At European level, TI-S instigated the work towards an EU Directive to strengthen legal protection of whistleblowers. The EU *Directive on the Protection of Persons Reporting on Breaches of Union Law* was adopted in March 2019. Adoption of the EU Directive has been a very significant step forward as Member States are expected to incorporate the directive into national law. The positive impact of this can be seen at country level. It highlights the leverage that can be created when working at multiple administrative levels at the same time while optimising the use of knowledge and expertise in a very specific technical and legal area.

Key recommendations and lessons learnt:
- Continue to capitalise on TI's unique expertise in the area of whistleblower protection.
- Systematically map the Movements' efforts to ensure the protection of whistleblowers.
- Explore and map different approaches applied by ALACs in contexts where a more active role persecution may be too sensitive or dangerous.

2.2 Strategic priority II: Prevention, enforcement and justice

Strategic priority II covers the following two commitments:

- **Commitment 2.1:** Promoting prevention and enforcing anti-corruption standards.
- **Commitment 2.2:** Achieving justice: ending impunity for corruption.

Section 2.2 explores the results generated and lessons learnt under each of these commitments

2.2.1 Commitment 2.1: Promoting prevention and enforcing anti-corruption standards

THE CHANGE Public and private institutions implement the highest transparency, accountability and integrity standards to prevent and confront corruption.

OUR ACTION We will develop, monitor and advocate for key anti-corruption standards and practices

According to a survey that was carried out as part of the mid-term review of TI's strategy 2020, most NCs responded that commitment 2.1 *Promoting prevention and enforcing anti-corruption standards* constitutes the core of their work (Iongh et al. 2018). And indeed, many of the documents reviewed refer to changes in processes, practice and policies.

Looking at the body of evidence, NCs approach outcome 2.1 in different ways: Many NCs use well-designed and tested methodologies and processes that have been developed by the TI Movement, such as *Integrity Pacts* (IP), *Beneficial Ownership Transparency* (BOT), *Transparency in Corporate Reporting* (TRAC), the *Business Integrity Country Agenda* (BICA) assessment framework, *SDG 16 parallel reporting,* the *Standardised External Independent Monitoring System* (SNOIE), as well as an effort to look into *anti-corruption in the humanitarian sector*. In addition, many NCs aim to bring about change in anti-corruption standards and practices through more general, sustained advocacy across different sectors, without necessarily using specific tools.

This section focuses on the effectiveness of some of the most prominent methodologies, processes and/or specific initiatives identified in the documents reviewed, as well as the lessons learnt with regard to advocacy in general.

Integrity Pacts

Transparency International has promoted the use of *Integrity Pacts* to prevent corruption in procurement processes, where monitoring partners (usually CSOs) monitor procurement processes by government agencies. Apart from the increased knowledge and capacity of civil society monitoring partners, Integrity Pacts have also had a positive impact on procurement authorities, especially in seeking engagement with the public. A review of Integrity Pacts in 2015 showed that they had encouraged fair competition among suppliers. Given the nature of Integrity Pacts, it is, however, impossible to prove whether corruption would have taken place in the absence of an *Integrity Pact* or whether corruption has taken place outside the remit of oversight of the *Integrity Pact*. One participating NC therefore describes Integrity Pacts as an "early warning system" that is able to highlight problems in advance. Ultimately, the strength of *Integrity Pacts* lies in the prevention of irregularities. The cost-benefit of *Integrity Pacts* is somewhat difficult to quantify, although there are examples in the literature of very significant savings (Basel Institute on Governance 2015; Beke et al. 2015).

A more recent review in 2018, however, is more ambivalent. It shows that the use of *Integrity Pacts* in the *Civil control mechanism for safeguarding EU funds* project had not (yet) been able to show benefits in terms of improved value for money in public procurement at the time of the mid-term learning review. In part this was due to a slow implementation of the project. Factors that contributed to the delay include monitoring partners not having the right level of accreditation to access confidential material, fear of being compromised during the bidding process, as well as legal barriers (perceived and real). Other factors include changes in staff, in political command, and in selection committees; documents being unavailable or inaccessible or needing correction. Nevertheless, participating stakeholders welcomed the increase in capacity, trust, transparency and procurement practice in general. The review highlights the considerable value of the pre-tendering phase to facilitate a common understanding of *Integrity Pacts* among the different stakeholders and the development of good working relationships. The review recommends the realisation of a cost-effectiveness exercise with monitoring partners (ODS 2018b).

BOT

Throughout the strategic period, TI has continued to advocate for Beneficial Ownership Transparency (BOT), a requirement for companies to disclose information about the people who ultimately own or control them. BOT is an important mechanism to "reduce the ability of beneficiaries of financial interests to hide their connection to these interests". The concept of BOT was conceived before the start of the current strategic cycle. It capitalises on TI's added value as a global Movement by connecting different instances of corruption and exposing them beyond national level. The mid-term review of TI's strategy 2020 highlights that a checklist to monitor countries' progress in the application of BOT has been taken up across the Movement (Iongh et al. 2018). This has generated visible results For example, in Ghana the government has moved towards implementation of a BOT register as a result of external pressure and involvement of TI Ghana (Transparency International 2019f). In Sierra Leone there is growing public support for Beneficial Ownership Transparency. (Transparency International 2019g). And as a result of continued pressure from TI and other organisations, the B20 have identified BOT as one of their policy priorities going forward. The B20 have recommended the establishment of public registers on beneficial ownership information, which is a significant step forward (Transparency International 2018b).

The Global Advocacy Review concludes that key factors in TI's success in promoting BOT has been 1) the collaboration between different parts of the organisation to build expertise and advocacy power, and 2) the resourcing of policy expertise an research at the Secretariat level as well as in other parts of the Movement (Miller-Dawkins and Southall 2018).

TRAC

Since 2009, TI has been using *Transparency in Corporate Reporting* (TRAC) as a tool to assess and promote transparency in reporting in the private sector. The tool covers three dimensions:

1) **Dimension I:** Reporting on anti-corruption programme (ACP).
2) **Dimension II:** Organisational transparency (OT).
3) **Dimensions III:** Country-by-country reporting (CBC), specifically for companies with a multi-national set-up.

In 2019 the TRAC methodology was evaluated. The conclusions can be summarised as follows (Humboldt-Viadrina Governance Platform 2019):

- TRACs have contributed to improvements of certain aspects of corporate reporting: Significant improvements can be observed in dimensions I (ACP) and minor improvements in dimension II (OT). The multi-national set-up of some companies, however, remains a murky area.
- Drivers behind the improvements in corporate reporting include reputation and public image, reduction in the risk of corruption, and changes in legislation.
- A constraint is 1) the lack of impetus to improve country-by-country reporting as it would result in a competitive disadvantage, and 2) the lack of improvement in legislation.
- Overall the TRAC methodology is seen as robust, with some room for improvement. Because of the systematic nature of the tool, the application of TRACs facilitates comparison between companies and generates useful input for use in advocacy.
- Some NCs using the tool suggest the inclusion of information on Beneficial Ownership Transparency (BOT) in the TRAC. Others, however, indicate that this would be challenging from a methodological perspective.
- The evaluation concludes that TRAC is a useful tool for engaging with companies, thereby contributing to commitment 1.2. It provides an entry point for dialogue and the information generated contributes to increased visibility among media, government officials and CSOs. It provides information and evidence that can be used in advocacy.

In a separate evaluation, de Rooij and van den Berg came to similar conclusions. The evaluation clearly showed that the tool itself facilitates engagement with a large number of companies. They report that, through TRACs, 76 companies in Russia, Ukraine, Lithuania and Brazil have improved their public reporting practices on anti-corruption, often after consultation with TI. The results generated through the application of TRAC is also used to inform the development of new a/o improvement of existing legislation. (Rooij and Berg 2019).

Both evaluations recognise that, in order to be effective, TRAC assessments of a particular company need to be repeated periodically Repeat assessments should ideally be more in-depth. However the question is how feasible this is, given time and funding constraints (Humboldt-Viadrina Governance Platform 2019; Rooij and Berg 2019).

BICA

Transparency International's *Business Integrity Country Agenda* (BICA) initiative was introduced in 2014. The aim of BICA is to initiate collective momentum to strengthen business integrity in a country. To do so, a credible foundation for action needs to be established, with a thorough assessment of the major factors impacting companies' ability to do business with integrity. BICA assessments determine the status of various thematic areas broken down by various indicators and proposes recommendations for key indicators in order to improve their status, which is then captured in a BICA Assessment Report.

In 2019 the BICA methodology was evaluated, the results of which are summarised in this section (The Governance Group 2019):

- NCs appreciate the value of the BICA assessment as it lays a generally accurate baseline with regard to the state of business integrity in country.
- The multi-stakeholder approach involved in conducting a BICA assessment is appreciated, although there are concerns about the effort required to establish as well-functioning National Advisory Group (NAG). Establishment of the NAG is, however, an essential part of the BICA process as it plays a key role in gathering information and gaining access to contacts for interviews.

- The BICA assessments facilitate engagement with individual companies, CSO partners, research institutes, national media, which is seen as an important 'precursor to change'. This is also confirmed by the evaluation by de Rooij and van den Berg (Rooij and Berg 2019). This is particularly useful for NCs with limited networks, as it helps them expand their existing networks. For NCs with pre-existing established networks, this element is seen as less important. It highlights the very strong link and synergy between commitment 1.2 and 2.1.
- While BICA assessment generate substantial information that can be used to inform advocacy, the evaluation by The Governance Group observes that only few chapters had embarked on the advocacy stage of the process. The evaluation recommends the provision of support (fund-raising and technical) to help NCs to embark on the second stage, which focusses on follow-up action.

  This observation by The Governance Group is in slight contrast with the evaluation by de Rooij and van de Berg, who give concrete examples of cases where the BICA has contributed to changes in practice and policy. For example:

  - TI Mongolia was invited to present the results of the BICA at the supplier forum of Mongolia's largest mining operation to promote the benefits of Business Integrity to over 130 supplier companies.
  - In Italy, one of the recommendations of the BICA, the whistle-blower law, was passed in November 2017. The likelihood of TI Italy having contributed to the passing of the law is high.

NCs involved in both BICA and TRAC, see both tools as complementary. Where the TRAC is considered a useful tool to engage with individual companies and put the issue of business integrity on the radar, the BICA involves a broader country approach and helps NCs explore the landscape and discover where the biggest problems and opportunities lie (Rooij and Berg 2019).

SDG 16 parallel reporting

In the wake of the adoption of Sustainable Development Goal (SDG) 16, in 2017, the Secretariat of Transparency International (TI-S) developed an SDG 16 parallel reporting tool with the aim of supporting TI National Chapters in monitoring their government's progress on the four anti-corruption targets of SDG 16. The aim was to strengthen NCs' ability to engage in SDG 16 advocacy, by producing evidence to supplement the official government reports submitted as part of the official 'Voluntary National Review' (VNR) process. The review gave a mixed picture: In some countries, in particular those where it was part of a regional initiative, application of the tool created sufficient momentum. In some cases, the information generated informed ongoing advocacy campaigns, in other cases the information was used to design new campaigns. Based on the strengths and opportunities identified in the review, the report suggests the development of a global strategy on SDG16 parallel reporting that connects national, regional and global level (Laberge 2019).

However, when Miller-Dawkins and Southall considered SDG shadow reporting as the potential focus for global advocacy, they concluded that there was no evidence of likelihood of impact. Instead, they suggested to leave the decision to engage in SDG16 parallel reporting to the individual NCs, depending on whether it is considered politically relevant in their context (Miller-Dawkins and Southall 2018). The 2018 Annual Report for the Asia Pacific Programme reports continued investment in this area, including in Afghanistan, Bangladesh, Maldives, Mongolia, Nepal, Pakistan and Sri Lanka (Transparency International 2019a).

SNOIE

Developing grievance mechanisms that function well in a particular cultural setting can be challenging. In some countries it has been difficult to get the local population engaged in reporting directly through the established grievance channels. In other countries it can be difficult to establish grievance mechanisms that satisfy both local communities and public institutions (SDG Lead 2018).

An interesting process that is applied by TI Cameroon is the Standardised External Independent Monitoring System (known as SNOIE). SNOIE is used in the REDD+ programme for reporting grievances with regard natural resource management. The process consists of seven steps:

1) Observation is made in community.
2) One of the local CSOs working with the SNOIE, verifies the complaint in the field and files a report, which is sent to FODER, the implementing organisation.
3) FODER quality assures the report in cooperation with the CSO.
4) FODER sends the report to a committee of six experts and TI Cameroon initiates lobby work (centrally and locally).
5) The report is then sent to the responsible local authority, as well as relevant national level.
6) The local CSO/FODER go on joint mission with local authority to verify the grievance.
7) If the complaint is found to be relevant, the local authority takes appropriate actions.

Following capacity building of CSOs and communities to engage in the REDD+ process, there has been an increase in the number of cases reported through SNOIE.

An interesting feature of the SNOIE process is that it is ISO standardised (ISO 9001). It is proving a great success in resolving dispute over forest- and resource-management

The final evaluation of the REDD+ programme concludes that "The ISO standardised system has been very useful in terms of getting both the public and not least the political system involved in a standardised and transparent process, and has made it easy for all partners involved to understand their role, and what is expected of them. The certification lends a degree of authority to the overall process" (SDG Lead 2018)

Anti-corruption in the humanitarian sector

In 2015 embarked on a 2-year project *Collective resolution to enhance accountability and transparency in emergencies* (CREATE). The aim of this research project was to investigate and build an evidence base on the key corruption risks. In 2018 a learning review took place to capture the main lessons learnt. The review draws the following conclusion: "The CREATE project did not necessarily enhance integrity and capacity to confront corruption in the humanitarian sector, and it is difficult to measure the extent to which the project has raised overall awareness. Nonetheless, the project created an environment in which humanitarian actors and other relevant stakeholders could openly discuss the issues identified in each of the reports and discuss the recommendations moving forward. Therefore, it was successful in presenting the problem at many fora at regional, national and international levels". It recommends that the findings are taken forward by TI a/o project staff and encourages DG ECHO to include the finding in their agenda going forward (ODS 2018c). From the documents reviewed, it is not clear what has been the follow-up since.

Advocacy in general

Apart from the use of the aforementioned specific methodologies and processes that facilitate evidence-based advocacy, many NCs are involved in continuous advocacy in order to bring about change in policies, standards and practices.

With regard to policy development, adoption and implementation, a number NCs report progress along a continuum of *space creation, agenda setting, policy formulation, policy change, budgeting, policy implementation and monitoring*. However, most of the documents reviewed do not provide a comprehensive Theory of Change and/or overview of the advocacy journey from the starting point to the end goal. The final evaluation of the *Siemens Integrity Initiative* project considers the absence of such Theory of Change "a big flaw" (Rooij and Berg 2019). It may result in oversimplified strategies that ignore some of the complexities of social and political change and ignore the fact that advocacy is usually neither linear nor predictable.

In the absence of a Theory of Change and/or overview of the advocacy it is often difficult to nail down the enablers and constraints along the advocacy journey pursued by TI, NCs and their partner organisations. Nevertheless, some of the documents reviewed include some useful pointers, many of which are also summarised in the document *Enhancing Transparency International's advocacy* (Miller-Dawkins and Southall 2018).

Looking across the documents reviewed, TI's core strengths for conducting advocacy include the following:

- The Movement itself with a presence in over 100 countries across the world, which enables it to both understand the drivers of corruption and to be in a position to influence national leaders. It also gives the safety of numbers and a level of protection as a result of global solidarity.
- Its specific expertise in the area of anti-corruption in general, as well as anti-corruption in specific sectors such as forestry and mining.
- Its credibility as a result of which it often asked to engage in consultation processes on issues related to corruption.
- In some countries, its less confrontational approach is seen as an asset, which makes it more approachable and less controversial to engage.
- Provided a robust quality assurance mechanism is in place, the quality of TI's research is generally considered high.
- Its collaboration and partnerships with other organisations.

Looking across the documents reviewed, key recurring constraints for conducting advocacy include the following:

- The lack of a coherent approach to advocacy.
- The lack of a coherent and joint-up strategy, in particular for global advocacy initiatives.
- Failure to integrate work across different advocacy issues.
- Uneven capacity across the Movement: While there appear to be strong advocacy capacity in some parts of the Movement, other parts struggle in terms of numbers and expertise.
- Projectisation of some of its advocacy work, resulting in significant time and financial constraints.
- Competing demands where low hanging fruits, i.e. practical solutions that generate a more immediate result, are prioritised over longer-term, unpredictable advocacy for systematic change.
- The lack of focus as a result of which some advocacy efforts end up being too diluted and not sustained over a period of time long enough to affect significant change.

- Lack of agility and flexibility to respond to changes in the environment as well as the insights generated through learning.

Taking into account the enablers and constraints, Miller-Dawkins and Southall make the following recommendations specifically for global advocacy by TI (Miller-Dawkins and Southall 2018):

- Focus global advocacy on two sustained strategic bets. This recommendation has since been followed up by TI.
- Clarify and strengthen TI's approach to global advocacy.
- Based on strategic focus and approach, pro-actively fundraise for programme funding.
- Support the Movement to put in place protective and responsive mechanisms for threats to anti-corruption activists and Chapters.

From the above strengths, weakness and recommendations, it is evident that many issue touch upon the way the Movement is organised. This will be explored in more detail in section 2.3.

Examples of significant achievements and contributions to commitment 2.1:
- In Ghana in Ghana the government has moved towards implementation of a BOT register as a result of external pressure and involvement of TI Ghana.
- As a result of continued pressure from TI and other organisations, the B20 have identified BOT as one of their policy priorities going forward. The B20 have recommended the establishment of public registers on beneficial ownership information, which is a significant step forward.
- The final evaluation of the *Climate Policy and Finance Integrity* project reports the adoption and implementation by key global and national climate finance institutions of 35 fund policy or practice changes that effectively safeguard against corruption in climate finance delivery, as well as of 18 specific text changes reflecting best practice in global climate funds across nine participating countries (Bangladesh, Costa Rica, Kenya, the Maldives, Mexico, Nepal, Peru, Rwanda, South Korea)(Universalia Management Group 2019).
- Through the implementation of TRACs, 76 companies in Russia, Ukraine, Lithuania and Brazil have improved their public reporting practices on anti-corruption, often after consultation with TI. The results generated through the application of TRAC is also used to inform the development of new and/or improved legislation.
- Following capacity building of CSOs and communities to engage in the REDD+ process in Cameroon, there has been an increase in the number of cases reported through SNOIE. SNOIE is proving a success in resolving dispute over forest- and resource-management, which is helped by the fact that the process complies with ISO standards, which gives it extra weight and credibility.

Key recommendations and lessons learnt:
- Continue the development of a body of evidence that reflects on the cost-benefit of Integrity Pacts.
- Continue to explore the contexts, as well as the prerequisites that should be met, to ensure the effectiveness and cost-effectiveness of Integrity Pacts.
- Develop a consistent approach to advocacy that recognises the complexity and unpredictability of the advocacy journey, and that facilitates learning and cross-fertilisation across NCs.
- For global advocacy initiatives, develop a joint-up strategy that capitalises on the strengths and value-added of the Movement.

2.2.2   Commitment 2.2: Achieving justice: ending impunity for corruption

THE CHANGE The corrupt are increasingly being held to account and punished.

OUR ACTION We will apply increased pressure on law enforcement and justice systems to punish crimes of corruption – especially grand corruption – and we will encourage people to take action when justice is not served.

Achieving justice: ending impunity for corruption is a commitment that is significantly less prominent in the documentation reviewed. There are likely to be a number of reasons behind this:

- The focus on impunity reflects a relatively new strategic focus for the movement. Consequently, it takes time, as well as trial and error, to find and articulate effective strategies in this area. This is further complicated by the fact that many strategies in this area are likely to be medium to long term, without generating results in the short term.
- Embarking on a strategy to end impunity is not without risk. For that reason, parts of the Movement are hesitant to fully embrace this commitment. There may be insufficient consensus across the Movement about an approach that is safe for those involved, as highlighted in the mid-term review of the Strategy 2020 (Iongh et al. 2018).
- The ALACs provide support to individuals and communities who come forward with information about corruption. This in itself provides an opportunity to seek redress and address impunity. For example, the mid-term evaluation of the IMPACT grant reports progress in this area, in particular in Argentina and Peru (Fontana and Rosario 2018). The type and caseload of issues addressed through the ALACs are, however, not reflected in the body of evidence reviewed, apart from the example of the ALACs the Balkans as discussed in 2.1.3.
- *Ending impunity for corruption* is a commitment that does not stand on its own. There is a level of overlap and interplay with commitment 1.1 *creating demand for accountability, and empowering action*, in particular with regard to initiatives that support the mobilisation of activists and communities in order to seek redress against corruption. *Seeking redress* and *ending impunity* is often the end goal for activists and communities affected by corruption and a key driver for mobilising themselves and taking action. This link is clearly reflected in the mid-term evaluation of TI's Asia Pacific programme which states that "….. thanks to innovative approaches and a high number of outreach and awareness activities by NCs and their partners, there is already some behaviour change, with an increased case load for people seeking redress against corruption". The evaluation makes a specific recommendation to further investigate the contribution of social accountability to people seeking redress, community action, and anti-corruption activism (Karlberg 2018). From the documents reviewed, it is not clear whether this recommendation has been followed up.

In return, the efforts to facilitate and support collective action are likely to be less effective when the chances of redress and ending impunity are limited, as mentioned in *From grievance to engagement*. The report uses the example of Georgia where there is a level of fatigue, since it is proving difficult to move to the next level of fighting corruption effectively. To get out of this impasse, there is a need for some "big wins" in terms of tackling grand corruption (Florez et al. 2018), such as high-profile perpetrators being convicted.

- Impunity also affects the effectiveness of mechanisms such Integrity Pacts, where stakeholders such as the private sector are likely to be less interested in supporting an Integrity Pact that lacks a reasonable chance of enforcement when corruption is identified (Basel Institute on Governance 2015).

According to mid-term evaluation of the TI Strategy 2020, the *Unmask the corrupt campaign* was meant to introduce new ways of working and address some of the above challenges. According to some, the campaign reflected the increased emphasis on activism under the 2020 Global Strategy. In practice, however, the campaign was considered not successful and brought to an early close due to lack of adequate planning and funding (Iongh et al. 2018). As a result, it did not succeed in bringing about the anticipated shift in culture with greater emphasis on activism.

Notwithstanding these challenges, there are some very interesting examples of progress that clearly show the synergies between commitments. For example:

- The RGFI project in Vietnam built the capacity of two communities to develop their skills and confidence in monitoring the flow of funds for on-going forest programmes in order to seek redress in case of irregularities. This targeted approach has resulted in real change locally and is now spreading as smart practice. *Towards Transparency's* efforts to share the lessons learnt from this pilot could potentially have a bigger impact on changing government institutional processes beyond the target areas. If practices tested in the RGFI project spread more widely, communities outside the target area may also become interested in monitoring and seeking redress for corruption and mismanagement in forest finance programmes (Pellini 2016).
- Through the REDD+ project TI Papua New Guinea and other CSOs have been supporting communities to seek redress for the negative impact of the Special Agricultural Business Leases (SABL), which bypass proper community consultation (Pellini 2016).
- In Chile, the organisation affiliated with TI launched the programme '*Observatorio de justicia y impunidad'.* The programme aims to follow up on judicial cases of corruption, review the real implementation of legislation and try to prevent the system from stalling execution of sentences (Iongh et al. 2018).
- The mid-term evaluation of the IMPACT grant reports that NC in Argentina has been successful in becoming a third-party civil complainant in one grand corruption case in the country. It sets an encouraging precedent, thereby opening opportunities for other civil society organisations to litigate corruption cases (Fontana and Rosario 2018).

As highlighted in the mid-term review of TI's Strategy 2020, there is a need to continue the debate with regard to strategic priority 2 *Prevention, enforcement and justice*, and in particular commitment 2.2 *Ending impunity for corruption* to identify workable approaches and mechanisms that take into account "the different stages of a country's development, the different levels of acceptance of corruption, the different levels of protection of activists and the space for civil society" (Iongh et al. 2018). Depending on the outcome of the debate, the ensuing strategy is likely to be different from country to country, with ample opportunity for learning across countries. It highlights the importance

of *sharing what works to stop corruption*, the added value of being part of a global Movement, and the facilitating and supporting role of TI-S therein. These issues will be explored in section 2.3.

Examples of significant achievements and contributions to commitment 2.2:
- TI Maldives: Repeal of the anti-defamation and freedom of expression act.
- The RGFI project in Vietnam built the capacity of two communities to develop their skills and confidence in monitoring the flow of funds for on-going forest programmes in order to seek redress in case of irregularities. This targeted approach has resulted in real change locally and has the potential to spread as smart practice beyond the original target area.
- In Argentina, the NC has been successful in becoming a third-party civil complainant in one grand corruption case in the country. It sets an encouraging precedent, thereby opening opportunities for other civil society organisations to litigate corruption cases.

Key recommendations and lessons learnt:
- In future evaluations and learning reviews, explore the synergy between *achieving justice: ending impunity for corruption* and other commitments.
- Continue research (and debate) with regard to priority *2. Prevention, enforcement and justice*, and in particular the area of *ending impunity for corruption* to identify workable approaches and mechanisms in different contexts.

2.3   Strategic priority III: Strong movement

Strategic priority III covers the following three commitments:

- **Commitment 3.1:** Sharing what works to stop corruption.
- **Commitment 3.2:** Building a sustainable Movement.
- **Commitment 3.3:** Ensuring the relevance of our Movement.

Section 2.3 explores the results generated and lessons learnt under each of these commitments.

2.3.1   Commitment 3.1: Sharing what works to stop corruption

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THE CHANGE *An increased body of knowledge of the interventions to stop corruption is readily available, focusing on what has worked and enabling the sharing of expertise.*

OUR ACTION *We will facilitate needs-based knowledge sharing within and outside the Transparency International movement.*

Monitoring and evaluation

As part of TI's Strategy 2020, there is a clear commitment to M&E. The substantial body of evidence considered for this systematic review is testimony of this commitment.

Looking at the body of evidence reviewed from a learning perspective, the nature and utility of the evaluations and reviews vary significantly. Many reviews are structured in a similar way and use selected DAC criteria as the overarching framework, in particular the criteria of *relevance,*

effectiveness, efficiency, impact and *sustainability*. This is a common trend in the development sector and is usually driven by donor requirements. In case of the TI's body of evidence reviewed, however, application of these criteria as the overarching framework often results in somewhat bland and wordy reports, sometimes with grand conclusions that are not sufficiently substantiated, and from which it is difficult to extract meaningful learning that can be applied elsewhere. The mid-term review of TI's Strategy 2020 makes a similar observation: "…. what works against corruption is not easily shared across contexts as the information is not captured to a sufficiently granular level in order to control for external or internal factors." (Iongh et al. 2018).

Looking at the substance reported under the respective DAC criteria in the documents reviewed, the substance reported under the headings of *efficiency, sustainability* and to some extent *relevance*, rarely generates information that is useful. In part, this seems to be driven by the absence of a clear analytical framework and clear benchmarks against which performance under these headings is assessed.

The information reported under the headings of *effectiveness* and sometimes *impact* tends to be more useful. But even then, it is often difficult to pick out the learning as the information tends to be heavily synthesized in order to come up with summary statements that apply across initiatives across multiple countries.

There are, however, a number of reports that stand out and are more informative with greater potential to contribute to organisational learning. These documents share one or more of the following characteristics:

- The review or evaluation has a **clear focus**, such as a particular tool, mechanism or process that has been implemented in a number of countries.
- The evaluation or review responds to a **clear set of evaluation questions that focus specifically on learning**, rather than the generic DAC criteria.
- The evaluation or review uses a **clear analytical framework**. In such cases, the analytical framework usually reflects the Theory of Change that underpins the project or programme initiative. In particular when the Theory of Change is well designed, i.e. it recognises the complexity and underlying assumptions have been clearly articulated, it can be helpful in answering questions about what works, what does not work, where, when and why.
- The evaluation or review report is **rich in more detailed case studies**. It should be emphasized that case studies that are more informative go well beyond a summary paragraph in a text box. Instead they are well elaborated, analytical and ideally describe the entire journey over a period of time, including the constraints, challenges and opportunities and the way these have been addressed.

When looking at M&E, it is important to recognise that, as a Movement that focuses on fighting corruption, TI is different from most other organisations. On the one hand it deals with much more complex and often sensitive processes of socio-political change that are very unpredictable and most of the time not linear. On the other hand, with the exception of grant-funded projects, TI does not have the same reporting requirements as the average INGO. It is not under the same pressure to come up with a global, consolidated picture of its performance in 100 or so countries. This means that it can and needs to go about M&E in a different way: Instead of focussing on reporting against the DAC criteria, the focus needs to shift in favour of capturing change over time, including the ups and downs, the setbacks and opportunities, and the learning that generates. This requires a different type of M&E (and mind-set) in which, ideally, NCs and practitioners play a greater role, rather than a process that

is merely driven by external consultants. It also provides an opportunity to promote more creative methodologies that are more appropriate for capturing process and soft outcomes.

Some donors recognise the need for greater flexibility in design, monitoring and evaluation for the type of programmes implemented by TI, as recognised in the evaluation report of the *Whistleblowing in Europe* project (Unknown 2017).

It is appropriate to make a distinction between *monitoring* on the one hand, and *evaluation* on the other. While the proposed stronger focus on learning implies a stronger emphasis on evaluation rather than monitoring, there is a place for basic monitoring across the Movement. In a movement, the driver behind monitoring is not so much about control and oversight, but rather about creating a high-level overview of who is doing what, where and at what scale. At present, such high-level overview seems to be missing. It tends to reside with individuals, which makes *signposting* and *connecting people* more difficult. This is further compounded by staff turnover.

Following adoption of TI's strategy 2020, TI developed the *Impact Matrix* as part of TI's approach to M&E (Caldeira and Werner 2015). The matrix recognises the complexities of assessing the impact of TI's work and aims to resolve this by breaking impact down into more specific results areas, specifically for priority I *People and partners* and priority II *Prevention, enforcement and justice*[1]. The specific results areas are useful in terms of classifying some of the results generated by the Movement. As such they may be useful as part of a broader set of meta-data/taxonomy for a future MIS system (see below).

It is noted that many of the reports reviewed as part of this systematic review do not use the impact matrix as part of their analytical framework or as a way of presenting the results generated, which may imply that the document has not been fully absorbed across the Movement.

Reporting

It is understood that reporting by NCs to TI-S takes place at two levels:

- Multi-country projects coordinated by TI-S: In these cases, reporting is included in the contractual arrangements between TI-S and the participating NCs.
- Impact reporting by NCs against TI's Strategy 2020: Currently, reporting at this level is not fully implemented across the Movement. Review of these reports is not within the remit of this systematic review.

The reporting mechanisms that are in place at the moment make it difficult to get an overview of who is doing what, where and at what scale. This is further compounded by the lack of a supporting Management Information System (MIS) that can be used as a self-help portal for people to find relevant information and connect with people who are dealing with similar issues and have the same information needs.

Research

Research plays a key role in TI's work. It facilitates learning about what works, what does not work, why, and in what circumstances. According to the mid-term review of TI's Strategy 2020, learning is the key driver behind the research projects launched during this strategic cycle. It addresses some of

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[1] The impact matrix currently does not comprise priority III *Strong movement,* presumably because it is seen as an internal affair

the short-comings of the evaluation and review reports with regard to their learning potential (Iongh et al. 2018).

According to the body of evidence reviewed, TI's research products are generally of high quality. They have the potential to provide important input into evidence-based advocacy, as suggested by the *final evaluation of TI's regional-based approach to NIS assessments in European neighbourhood South* and the *mid-term evaluation of mining for sustainable development (Karanasou et al. 2016; ODS 2018a)*. From the body of evidence reviewed, it is not clear whether in practice the research products are indeed used to their full potential.

An promising initiative is the Anti-Corruption Agency (ACA) research in the Asia Pacific region. The research was first conducted in 2016. The results have been used in advocacy to encourage improved performance at national level. In 2019 the regional reported that it was planning a second round of research, building on the lessons learnt of the first round (Transparency International 2019a).

Sharing and learning is more than M&E, research and reporting

While M&E and research provide key inputs into sharing and learning, it should be emphasized that this involves more than just generating evidence. A critical part of organisational learning is about connecting people who are dealing with similar issues, challenges and information needs. The mid-term review of TI's Strategy 2020 recognises this when it states "….., the focus should thereby be less on developing ever more tools and programmes but more on making the connections. These tools are necessary and appreciated in many cases, including for BOT, but it is making the connections between countries, issues, political levels, policy processes, etc. that the Movement can add its unique value." (Iongh et al. 2018). The added value of the Movement will be discussed in more detail in section 2.3.3.

Harnessing the use of technology

Increasingly technology plays an important part in sharing what works to stop corruption. Looking across the body of evidence reviewed, however, the use of technology for sharing appears to be limited at both at project and programme level, as well as across the Movement. This observation coincides with recommendations to improve communication within the Movement, which is identified as a recurring weakness in many projects and programmes.

At present the Movement does not have a Management Information System (MIS) in place. As a result, it is difficult to get a picture of who is doing what, where and at what scale. Information tends to be scattered across the Secretariat and NCs. It is understood the TI-S is working on the development of an MIS, but this is likely to take time.

While the introduction of a well-designed MIS platform would be a significant step forward, it is important to express a word of caution at this point: Experience from other organisations shows that MIS systems can easily become unwieldy, where users drown in an overkill of information, without being able to find what they are looking for. Much of the information captured tends to be pitched at too granular a level, rather than focussing at a more strategic level, cross-fertilisation and learning.

When designing TI's future MIS, it is paramount to be clear about the main purpose of such platform. In case of TI, the focus should be on sharing lessons learnt at strategic level and connecting people with shared interests and information needs. In contrast with INGOs involved in service delivery, it is less about the need to create a global picture of how well the Movement is doing.

Such well-designed, agile MIS could be a significant asset for technical networks and communities of practice of people and Chapters who are working on similar issues and who are dealing with similar

challenges and information needs. It could facilitate collaboration on regional initiatives, thereby decreasing the current dependency on regional advisors (Centre for Law and Democracy 2019).It would facilitate the sharing of knowledge and experiences on a more regular basis beyond the customary meetings, workshops and conferences.

Key recommendations and lessons learnt:
- Revisit the use of DAC criteria for evaluations and reviews and, instead, put greater emphasis on learning what works and under what conditions, what does not work, and why.
- Encourage the use of a well-designed Theories of Change in future programmes that recognise the complexity and clearly articulate the assumptions made.
- Ensure that future evaluations and reviews apply a clear analytical framework, where possible using a well-designed Theory of Change as a starting point.
- In the near future develop and roll out an MIS that is designed to support the key functions of the Movement, with emphasis on sharing, learning and connecting people with shared interests and information needs, rather than capturing information at too granular a level.

2.3.2   Commitment 3.2: Building a sustainable movement

THE CHANGE The Transparency International movement is professional, sustainable and leads by example.

OUR ACTION We will invest in our organisational capacity in a targeted way, to achieve best practice in both management and governance, with a special focus on promoting leaders within the Transparency International movement.

According the TI's Strategy 2020, commitment 3.2 focuses mainly on capacity, management and governance. With the exception of reflections on the role of technical networks and on roles and responsibilities of the different parts of the Movement, both of which will be discussed on in section 2.3.3, the documents reviewed do not explicitly explore *management* and *governance* issues at the level of the Movement. The focus of this section is therefore only on issues related to *capacity*.

Looking across the body of evidence reviewed, *capacity* is frequently mentioned, either as an enabler of projects and programmes, or as a constraint.

The increased investments in global programmes has enabled participating NCs to develop their skills and expertise in a range of specialist areas, in line with the rationale behind the establishment of Global Technical Networks (ODS 2015). This is seen as an important asset for NCs when developing new partnerships and networks, as highlighted in section 2.1.2. It contributes to their reputation and convening power (Pellini 2016; Smith et al. 2019; Universalia Management Group 2019), although the mid-term review of TI's Strategy 2020 argues that some NCs could be bolder in this area (Iongh et al. 2018).

Most of the capacity constraints identified in the documents reviewed pertain to capacity gaps across more generic domains such as *advocacy, building relationships with private sector partners, communication, fund-raising, M&E, research* and *project management*. Some reports mention that

capacity-related issues are further compounded by frequent staff turnover in some offices (Karanasou et al. 2016; ODS 2018a; Unknown 2019).

The capacity gaps in fund-raising are also echoed in the *Fundraising from the public* report by Pentatonic Marketing, which was compiled in response to the leaked Panama Papers. The report identifies the following areas of change required to become more effective in public fund-raising: leadership and culture; communication; collaboration; empathy; adaptability; technical skills; analytical thinking (Washington-Sare 2016). Furthermore, the 2018 annual report for the Asia-Pacific Programme highlights the need to revisit the funding-model and explore the possibility of pooled funding to support the work of some of the smaller, more vulnerable NCs (Transparency International 2019a).

To address some of these generic capacity constraints in a more systematic way, the mid-term evaluation of the *Mining for Sustainable Development* recommends the realisation of a capacity assessment among NCs as standard practice when preparing for specific projects or programmes (ODS 2018a).

Key recommendations and lessons learnt:
- Continue to invest in expertise in a range of specialist areas that are relevant for the Movement, thereby strengthening the reputation and convening power of NCs.
- Conduct capacity assessments as standard practice when preparing for specific projects or programmes.

2.3.3   Commitment 3.3: Ensuring the relevance of our movement

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THE CHANGE Transparency International serves as the point of reference on corruption issues in key countries, notably G20 countries, BRICS and MINTs.

OUR ACTION We will develop and implement new organisational models to ensure our presence and relevance in strategic locations around the world.

According TI's Strategy 2020, relevance of the Movement is reflected in 1) *new organisational models*, and 2) its *presence and relevance in strategic locations* around the world.

In 2013 TI established the so-called Global Thematic Network Initiatives (GTNIs), as part of a commitment to decentralisation which was made in the Global Strategy 2010-2015 (Transparency International 2011). Five Global Thematic Network Initiatives (GTNIs) were put in place, i.e. Humanitarian Aid Integrity (HAIP) run by TI Kenya; Integrity, Independence and Accountability of the Judiciary ('the Judiciary') at TI Romania; Mining & Corruption ('Mining') at TI Australia; and 'Pharmaceutical & Healthcare' (PHP) and Defence and Security (DSP) at TI UK. NCs were invited to join the networks, based on the relevance of the respective topics for their context.

In 2015, at the start of the current strategic cycle, TI-S commissioned an external review of the GTNIs. The review showed that the GTNIs, with support from TI-S, had contributed to increased knowledge and expertise at the level of the respective lead chapters. The increase in capacity comprises both

knowledge in the respective thematic areas and the ability of the lead Chapter to run a global programme. At the time of the review, there were early signs of horizontal collaboration and sharing across the participating NCs. On the other hand, the high expectations of the GTNIs, sensitivities around the use of the TI brand, combined with the lack of investment, resulted in "disappointment and stress", both at the level of the lead Chapters and TI-S. It reflects a level of tension with regard to the role and responsibilities of TI-S versus the roles and responsibilities of the lead agency. On the one hand, the introduction of the GTNIs is seen as an important step towards further decentralisation. On the other, it is difficult to let go. To address some of these challenges, the review suggests putting in place an agreement between TI-S, the lead Chapters, and the participating Chapters that clearly outlines the expectations, resources needed and the nature of the collaboration. Furthermore, monitoring, reporting and communications procedures need to be revisited and streamlined (ODS 2015).

Similar observations are made in the external evaluation of the *Open Governance* project with regard to the roles and responsibilities vis-à-vis coalition building: "The top-down approach to coalition building or creating of hubs led by Chapters, is not working. It might be better for TI-S to play a more facilitating role, identifying existing or emerging collaborations and leveraging those by offering support, resources and making connections" (ODS 2016).

These findings are reiterated by the mid-term review of TI's Strategy 2020 conducted in 2018: On the one hand it recognises that the emergence of networks provides an opportunity to make the Movement more agile. On the other, it observes that "GTNI programmes either struggled to gain full independence from TI-S or the lead Chapter has become increasingly central, defeating the purpose of having more distributed networks" (Iongh et al. 2018).

The *Tracking Anti-Corruption Summit commitments* project experienced similar challenges. A recent evaluation of this project highlighted the need for further clarification of the different responsibilities between TI-S and TI-UK. While NCs recognise the need for advocacy support, it is not always clear who should be providing this support. While TI-UK leads on the project, TI-S is responsible for some of the networks that have been built into the project plan, thus causing confusion at the level of NCs (Unknown 2019).

In contrast, however, a review of Phase I of the Mining for Sustainable Development programme (implemented by 20 NCs and let by TI Australia) is more upbeat. It shows significant progress in conducting research, thereby strengthening the knowledge base at the level of participating NCs. Most support to the participating NC had been provided by TI Australia. There was little evidence, however, of independent sharing across participating NCs, highlighting the need to find more effective strategies for horizontal, organisational learning, as observed in section 2.3.1 (ODS 2018a), as well as the report *Expanding the space for civil society anti-corruption work* by the Centre for Law and Democracy (Centre for Law and Democracy 2019).

Similar observations are made with regard to the establishment of the Regions: The mid-term review of TI's strategy 2020 concludes that: "For the regions, they are perceived by both some Chapters and TI-S staff as too closed off or internally-focussed and impact as measured through various evaluations, has been limited" (Iongh et al. 2018).

Looking across the body of evidence reviewed, there continues to be tension around the roles and responsibilities of the different parts of the Movement. On the one hand, there is a push to become a truly distributed network, on the other hand there still seems to be a level of hesitation with regard to taking decentralisation to a next level. The mid-term review of the TI's strategy 2020 concludes that

the most important challenges for TI is 'operational', rather than 'strategic' (Iongh et al. 2018). At the same time, it is important to emphasize that this tension is not necessarily unique to TI. Similar tensions can be observed in INGOs that are moving towards a more decentralised structure.

Apart from the review of GTNIs, *presence and relevance* in specific locations is only explored in the mid-review review of TI's Strategy 2020. The document observes that the specific focus on MINT and BRIC countries has proven to be not as relevant due to differences *within* those clusters as well as the rapid changes in the global political landscape. And with regard to lobbying of the G20 countries, the report highlights that this should be done by the whole Movement, not just the NCs in the G20 countries themselves (Iongh et al. 2018).

Added value is an important component of the relevance of the Movement. Looking across the body of evidence reviewed, there various documents that clearly reflect on TI's added value as a global Movement. Key aspects of its added value include: TI's r*eputation*, *visibility* and the corresponding *leverage* and *convening power* that generates for NCs in particular; as well as opportunities for *joint-up programming* that affects local, national, regional and international level where the *total is more than the sum of the parts*, as illustrated by the REDD+ programme (Pellini 2016) and the Whistleblowing in Europe project (Unknown 2017). Similarly, the Asia Pacific programme clearly builds on the added value, as mentioned explicitly in the 2018 Annual Report: "While concrete anti-corruption impact happens at national level and is achieved through the work of national chapters, the progress seen in the programme this year also highlights the strength of the TI model, that brings together global, regional and local expertise and knowledge to support and enhance this impact" (Transparency International 2019a).

Key recommendations and lessons learnt:
- Continue to explore how technical networks can contribute to the establishment of a truly distributed networks, thereby increasing the agility of the Movement.
- Optimise the potential and added value of working as a global Movement.

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3 Reflections and implications for TI's next strategy

Based on the findings regarding the respective strategic priorities and the corresponding commitments, as discussed in chapter 2, this chapter looks *across* the strategic priorities and explores the implications for TI's next global strategy. To that effect it reflects on:

- The overall structure of TI's Strategy 2020.
- The development of an overarching Theory of Change.
- The consistent mapping of stakeholders TI aims to affect.
- Development of an overarching results-framework.
- Communicating TI's work.
- Increasing TI's fund-raising potential.

3.1 Overall structure of TI's Strategy 2020

The body of evidence reviewed as part of this systematic review clearly shows the synergies between the three strategic priorities. It highlights the coherence of TI's strategy 2020. At first sight it may be tempting to classify Priority I *People and partners*, and Priority II *Prevention, enforcement and justice*, as the more programme-oriented strategic priorities, and Priority III *Strong movement*, as the more inward looking, organisation-oriented strategic priority. Review of the body of evidence, however, clearly shows that this is not the case. The documents reviewed show the very strong synergies between the three strategic priorities, where one reinforces the other, as visualised in the following diagram:
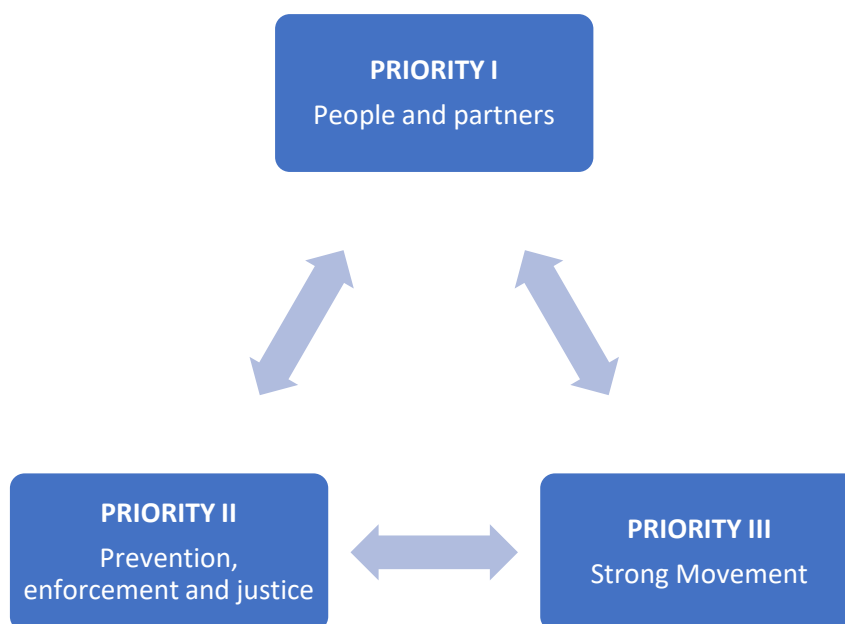

Figure 1: Synergies between strategic priorities

In that sense, Transparency International is somewhat unique. While the strategies of large, multi-national INGOs usually include a support strategy that addresses internal, organisational matters, in case of Transparency International having a strong *Movement* is an aim in itself. A strong Movement (as opposed to a strong organisation) reflects the strengths in numbers, the additional leverage as well as the increased opportunities for sharing and learning.

Similarly, there is no clear hierarchy between priority I and priority II. While it may be tempting to consider Priority I *People and partners* a precursor for Priority II *Prevention, enforcement and justice*, the body of evidence clearly shows that progress in the area of Priority II in turn facilitates the mobilisation of people and partners. I.e. the relationship works both ways.

Notwithstanding the importance of each of the three Priorities, looking across the body of evidence it is clear that more attention is paid to priority I *people and partners* compared to priority II *prevention enforcement and justice*. This may be a reflection of the emphasis in TI's programme effort. It may also be a reflection of the fact that many of the results under priority II *prevention, enforcement and justice* are less tangible, longer term, and often less predictable in nature, which makes it more difficult to capture progress. This is something TI may wish to explore when developing its next global strategy and the supporting tools and processes for capturing the results generated.

3.2   Development of an overarching Theory of Change

Underpinning the reflections on the overall structure of TI's Strategy 2020 as discussed in section 0, is the need and opportunity to develop a more comprehensive Theory of Change that articulates the multiple pathways that lead to the expected results, the synergies between those pathways, as well as the underlying assumptions.

TI's current strategy does not include such Theory of Change. It may be implied by the combination of the strategic priorities and commitments articulated in the strategy, as well as the results areas articulated in the supporting Impact Matrix, but it is not sufficiently clear how it all fits together and what some of the critical pathways are that lead to the expected results.

Considering that such Theory of Change needs to reflect a wide range of programme initiatives across the global Movement, it can only be pitched at a sufficiently high and generic level in order to be applicable to a wide range of different contexts without becoming a straight-jacket for programme development.

One way of solving that challenge would be the application of an actor-based approach that identifies the key types of actors that TI and the NCs work with, the level(s) at which they operate, and the types of change or results TI aims to affect at the level of the respective actors. Based on the experience of other organisations that operate in multiple countries around the world and that have applied such approach, this approach has proven to be sufficiently versatile to be adapted to different types of programme initiatives in very different contexts. It would provide NCs with a starting point for developing their own programmes, while offering them sufficient flexibility according to their focus and needs, and without imposing a straight-jacket.

Such actor-based approach lends itself to different types of programme interventions, whether it is the services provided by ALACs; the mobilisation of communities and activities to fight corruption and other types of injustice; Integrity Pacts to fight corruption in public procurement; the collaboration with private sector partners to increase transparency; advocacy for changes in policy or legislation; etc. Experience with other organisations shows that it encourages more coherent and joint-up programming.

3.3   Mapping of stakeholders TI is aiming to affect

The advantage of an actor-based approach to developing an overarching Theory of Change for TI is that it would facilitate a more systematic mapping of the types of stakeholders TI works with, the levels at which they operate and the changes TI is aiming to affect.

It would facilitate the development of more strategic interventions by exploring collaboration with multiple types of stakeholders, thereby increasing the synergies between pathways as well as the potential leverage of TI's programmes. It would help NCs explore pathways that are currently less trodden. It would help spot existing gaps and missed opportunities that seem to exist in some of TI's current programmes. Furthermore, it is likely to generate more innovation and experimentation.

3.4 Development of an overarching results-framework that informs IT's approach to evaluation and learning

An actor-based approach to programme development would be the foundation for the development of a versatile, overarching results-framework that could become the backbone of TI's approach to evaluation and learning. The aim of such framework is *not* necessarily to consolidate the results of the results generated by TI's programmes, but rather to take evaluation to a more strategic level and become more analytical in understanding what works, what does not, and why, both medium and long term. It would create increased opportunities for learning across countries, even when they are working in very different contexts.

3.5 Communicating TI's work

Having a more consistent way of articulating TI's approach and the results it generates puts TI in a stronger position to communicate its work externally, be it to governments, partner organisations, multi-laterals, donors, the general public, etc.

3.6 Increasing TI's funding-raising potential

The combination of an overarching Theory of Change, a more systematic way of capturing the results generated by TI's programme initiatives, and the ability to communicate TI's work in a coherent way to different audiences, is likely to increase the fund-raising potential of TI's work.

Annex I: TI Strategy 2020: Strategic priorities and commitments

PRIORITY I: People and partners

- **Commitment 1.1:** Creating demand for accountability, and empowering action

  THE CHANGE *People around the world denounce corruption and take increased action to confront it, by demanding transparency, accountability and integrity.*

  OUR ACTION *We will work with a wide range of people to act to confront corruption, demand accountability and contribute to anti-corruption approaches that are systemic and sustainable.*

- **Commitment 1.2:** Engaging partners and inspiring leaders

  THE CHANGE *A growing number of key partners and leaders drive anti-corruption progress.*

  OUR ACTION *We will work with and promote anti-corruption leaders and leadership, and foster strong partnerships in anti-corruption related fields most relevant to our priorities.*

- **Commitment 1.3:** Protecting anti-corruption activists

  THE CHANGE *Greater freedom of action and voice for anti-corruption activists.*

  OUR ACTION *We will defend and support Transparency International activists under threat, stand in solidarity with those whose work to expose corruption puts them at risk, and push back against the limits put on civil society space.*

PRIORITY II: Prevention, enforcement and justice

- **Commitment 2.1:** Promoting prevention and enforcing anti-corruption standards

  THE CHANGE *Public and private institutions implement the highest transparency, accountability and integrity standards to prevent and confront corruption.*

  OUR ACTION *We will develop, monitor and advocate for key anti-corruption standards and practices*

- **Commitment 2.2:** Achieving justice: ending impunity for corruption

  THE CHANGE *The corrupt are increasingly being held to account and punished.*

  OUR ACTION *We will apply increased pressure on law enforcement and justice systems to punish crimes of corruption – especially grand corruption – and we will encourage people to take action when justice is not served.*

PRIORITY III: Strong movement

- **Commitment 3.1:** haring what works to stop corruption

  THE CHANGE *An increased body of knowledge of the interventions to stop corruption is readily available, focusing on what has worked and enabling the sharing of expertise.*

  OUR ACTION *We will facilitate needs-based knowledge sharing within and outside the Transparency International movement.*

- **Commitment 3.2:** Building a sustainable movement

  THE CHANGE *The Transparency International movement is professional, sustainable and leads by example.*

OUR ACTION *We will invest in our organisational capacity in a targeted way, to achieve best practice in both management and governance, with a special focus on promoting leaders within the Transparency International movement.*

- **Commitment 3.3:** Ensuring the relevance of our movement

  THE CHANGE *Transparency International serves as the point of reference on corruption issues in key countries, notably G20 countries, BRICS and MINTs.**

  OUR ACTION *We will develop and implement new organisational models to ensure our presence and relevance in strategic locations around the world.*

Annex II: Documents reviewed

Year	Title	Author
2015	Learning review - Transparency International's Integrity Pacts for public procurement	Basel Institute on Governance
2015	Learning Review - Integrity Pacts for public procurement	Beke, Mieke, Blomeyer, Roland, and Cardona, Francisco
2015	Are we on the road to impact? Transparency International monitoring guide	Caldeira, Rute and Werner, Daniela
2015	Transparency International - Review of the GTNI programme	ODS
2015	Transparency International Vietnam programme "To contribute to effective implementation of anti-corruption policies and practice in government, business and society, 2013-2017" - Mid-Term Evaluation	Persson, Alf and Tien Dung, Trinh
2015	Learning review report of the REDD+ Governance and finance integrity for Africa (REDD+IN) project	Transparency International
2015	Strategy 2015	Transparency International
2015	Together against corruption - Transparency International strategy 2020	Transparency International
2016	Final evaluation of Transparency International's regional-based approach to NIS assessments in European neighbourhood South Phase II - Final report	Karanasou, Floresca, Karoud, Ahmed, and Kassis, Rifat
2016	Learning review - Anti-corruption brigades - Peru	Luft, Maximiliano
2016	External evaluation open governance	ODS
2016	Learning and sustainability review - Civil society capacity building for preventive anti-corruption measures in reducing emissions from deforestation and forest degradation (2011-2013) and reducing emissions from deforestation and forest degradation governance and finance integrity project (2013-2016)	Pellini, Katja
2016	Learning review for Transparency International's Linida project	Schakel, Lydeke
2016	Transparency International Secretariat - Implementation plan	Transparency International
2016	Internal learning review - Fundraising from the public: The Panama Papers activities	Washington-Sare, Chris
2017	Sharaka - Fostering Public Finance Integrity and Asset Recovery, and Empowering People, Groups and Communities for a Corruption-Free MENA Region: Six months' narrative report	Transparency International
2017	TI's Asia Pacific Regional Programme - Effective and accountable governance for sustainable growth: 2016 Annual Report	Transparency International
2017	Transparency International's Asia Pacific regional programme - 2017 annual report	Transparency International

Year	Title	Author
2017	Evaluation of the Transparency International project "Whistleblowing in Europe: Supporting the agents for change" funded by Adessium Foundation	Unknown
2018	From grievance to engagement - How people decide to act against corruption	Florez, Jorge, et al.
2018	IMPACT grant mid-term evaluation	Fontana, Alessandra and Rosario, Carmeliza
2018	Mid-Term Review of Transparency International's movement strategy 2020	Iongh, Wouter, de, et al.
2018	Denuncia lo que veas - Que no te roben la voz	Joseph, Arielle and Fernandes, Lucas Olo
2018	Mid-Term Evaluation - Transparency International's Asia Pacific programme 2016-2019	Karlberg, Pia
2018	Enhancing Transparency International's global advocacy	Miller-Dawkins, May and Southall, Katy
2018	External learning review of the Create project	ODS
2018	Mid-Term Evaluation - Mining for sustainable development	ODS
2018	Mid-Term learning review of TI Integrity Pacts: Civil control mechanism for safeguarding EU funds project	ODS
2018	Final evaluation of the "REDD+ Integrity for Africa" programme	SDG Lead
2018	Accountable Grant I-ACT: Quarterly narrative report - Q4	Transparency International
2018	Siemens Integrity Initiative - Final progress report	Transparency International
2019	Preliminary report for Transparency International: Expanding the space for civil society anti-corruption work	Centre for Law and Democracy
2019	Evaluation of Transparency International's Transparency in Corporate Reporting (TRAC) tool	Humboldt-Viadrina Governance Platform
2019	Review of Transparency International's SDG16 parallel reporting tool	Laberge, Marie
2019	Supporting Citizens in Fighting Corruption in the Western Balkans	Transparency International
2019	Final evaluation of the "Siemens Integrity Initiative Project" for Transparency International	Rooij, Agnes, de and Berg, Ingrid, van den
2019	Mid-term evaluation of the Transparency International project "Whistle-blower protection in Europe"	Smith, Jeremy, Clark, Martin, and Tibbett, Stephen
2019	Review of the Business Integrity Country Agenda (BICA) assessment framework and methodology	The Governance Group
2019	Accountable Grant IACT: 2018 Q4 (October 2018 - December 2019)	Transparency International
2019	Accountable Grant I-ACT: Quarterly narrative report - Q1	Transparency International
2019	Anti-corruption in focus: Thematic leadership for OGP	Transparency International
2019	Global Anti-Corruption Consortium: Quarterly Report - Quarter 2, 2019	Transparency International

Year	Title	Author
2019	Grant for an action under a framework partnership: Annual narrative report 2018 - Annex VI	Transparency International
2019	Land and corruption in Africa: Final project report to the land-enhancing governance for economic development (LEGEND)	Transparency International
2019	TI's Asia Pacific programme: Effective and accountable governance for sustainable growth - 2018 annual report	Transparency International
2019	Final evaluation of the project "Climate policy and finance integrity: Safeguarding the climate and climate finance against corruption	Universalia Management Group
2019	One page note - evaluation report: Tracking Anti-Corruption Summit Commitments Project	Unknown
2020	Global Anti-Corruption Consortium: Quarterly Report - Quarter 3, 2019	Transparency International

Table 2: Reports reviewed

Annex III: Potential case studies

Table 3 below lists potential case studies based on the body of evidence reviewed.

Rather than focussing on individual countries or projects, it may be more useful to identify key topics or focus areas that TI may want to look at when developing case studies. To that effect, the potential case studies have been clustered by focus area.

As mentioned in the introduction, it should be emphasized that the level of detail available in the body of evidence is often rather limited. The selection of case studies should therefore be treated carefully. Regional advisors are likely to be in a better position to advise which potential programme initiatives merit a full case study.

It should also be noted that there are likely to be many other promising programme initiatives with great learning potential that are not necessarily visible in the body of evidence reviewed.

Country	Project\programme initiative	Focus area(s)
• **Liberia**	• LEGEND	• Use of social media
• **Tunisia**	• Regional-based approach to NIS assessments in European neighbourhood South	• Use of social media
• **Liberia, Sierra Leone, Zambia**	• LEGEND project	• The use of an internet platform and social media in raising awareness.
• **Maldives**	• Asia Pacific programme	• Online campaigning
• **Papua New Guinea**	• RFGI	• Use of grass-roots level evidence in national level policy making.
• **Vietnam**	• REDD programme	• The process of local identification of problems at community level followed by escalating them to national level • Potential replication and scaling up beyond project area.
• **Indonesia**	• Linida project	• Innovations in outreach at community level, including the use of special data in a village information system • The use of formal complaints mechanisms by communities

Country	Project\programme initiative	Focus area(s)
• **Peru**	• Anti-corruption brigades	• The use of clear and practical mechanisms to channel citizens' discontent
• **Liberia, Sierra Leone, Zambia**	• LEGEND project	• The public space for bringing communities and authorities together, and the way it provides an opportunity for women to engage in the process. • The potential dual role of community leaders as community representatives on the one hand and perpetrators of corruption on the other (Zambia)
• **Guatemala**	• NA	• Collaboration with UN Women
• **Lebanon**	• NA	• Collaboration with UNDP
• **Indonesia**	• Asia Pacific Programme	• TI Indonesia's work with the second biggest state-owned company, PT.PLN. The company is now considered one of the most transparent state-owned enterprises in Indonesia.
• **Mongolia**	• Asia Pacific Programme	• The functioning of the Business Ethics Working Group and the way it facilitates dialogue between private sector and public sector representatives, as well as civil society actors.
• **El Salvador**	• Integrity Pacts for public procurement	• The role of the media in the termination of a contract with a private firm by the Ministry of Public Works.
• **Lebanon**	• NIS assessments in European neighbourhoods South Phase II	• Establishment of investigative journalism unit by the official Palestinian news agency

Country	Project\programme initiative	Focus area(s)
		and the Al-Hayat Al-Jadida newspaper, following training of a group of journalists by the Coalition for Integrity and Accountability.
• **Maldives**	• Asia Pacific Programme	• Investigative journalism into the case around the lease of islands to developers and the use of the material before the presidential elections.
• **Multiple**	• Global Anti-Corruption Consortium (GACC)	• Multiple aspects of Investigative journalism.
• **Europe**	• NA	• Working with parliamentarians on the issue of Golden Visa. • The role of TI-S in the EU Directive to strengthen legal protection of whistleblowers.
• **Cambodia**	• Asia Pacific Programme	• The role of TI Cambodia in drafting the *Law on the protection of reporting person* and the *Law on the protection of witness, expert and victims.*
• **Ghana**	• Ghana Integrity Initiative	• The way ALACs are brokers rather than persecutors filing complaints themselves on behalf of the communities. They collect the complaints, point the complainants in the direction of the relevant enforcement agencies, and support them if needed or connect them to specialised organisations
• **Zimbabwe**	• REDD+	• Background participation of ALACs during workshops.
• **Nepal** • **Pakistan**	• Asia Pacific Programme	• Use of mobile ALACs, to reach out to rural and

Country	Project\programme initiative	Focus area(s)
		marginalised communities and create avenues for citizen feedback.
• **Maldives**	• Asia Pacific Programme	• The ability of TI Maldives to operate and be effective despite the limitation of the space for civil society. • Repeal of the anti-defamation and freedom of expression act.

Table 3: Potential case studies by focus area

Bibliography

Basel Institute on Governance (2015), 'Learning review - Transparency International's Integrity Pacts for public procurement', (Basel, Switzerland: Basel Institute on Governance).

Beke, Mieke, Blomeyer, Roland, and Cardona, Francisco (2015), 'Learning Review - Integrity Pacts for public procurement', (Guadalajara, Spain: Blomeyer & Sanz).

Caldeira, Rute and Werner, Daniela (2015), 'Are we on the road to impact? Transparency International monitoring guide', (Berlin, Germany: Transparency International).

Centre for Law and Democracy (2019), 'Preliminary report for Transparency International: Expanding the space for civil society anti-corruption work', (Unpublished: Centre for Law and Democracy).

Florez, Jorge, et al. (2018), 'From grievance to engagement - How people decide to act against corruption', (Vermont, USA: Global Integrity).

Fontana, Alessandra and Rosario, Carmeliza (2018), 'IMPACT grant mid-term evaluation', (Berlin, Germany: Transparency International).

Humboldt-Viadrina Governance Platform (2019), 'Evaluation of Transparency International's Transparency in Corporate Reporting (TRAC) tool', (Berlin, Germany: Humboldt-Viadrina Governance Platform).

Iongh, Wouter, de, et al. (2018), 'Mid-Term Review of Transparency International's movement strategy 2020', (Brussels, Belgium: ODS).

Joseph, Arielle and Fernandes, Lucas Olo (2018), 'Denuncia lo que veas - Que no te roben la voz', (Colombia: Transparency International).

Karanasou, Floresca, Karoud, Ahmed, and Kassis, Rifat (2016), 'Final evaluation of Transparency International's regional-based approach to NIS assessments in European neighbourhood South Phase II - Final report', (Oxford, UK: INTRAC).

Karlberg, Pia (2018), 'Mid-Term Evaluation - Transparency International's Asia Pacific programme 2016-2019', (Madrid, Spain: Karlberg Consulting).

Laberge, Marie (2019), 'Review of Transparency International's SDG16 parallel reporting tool', (Berlin, Germany: Transparency International).

Luft, Maximiliano (2016), 'Learning review - Anti-corruption brigades - Peru', (Peru: Proetica).

Miller-Dawkins, May and Southall, Katy (2018), 'Enhancing Transparency International's global advocacy', (Berlin, Germany: Transparency International).

ODS (2015), 'Transparency International - Review of the GTNI programme', (ODS).

--- (2016), 'External evaluation open governance', (Brussels Belgium: ODS).

--- (2018a), 'Mid-Term Evaluation - Mining for sustainable development', (Brussels, Belgium: ODS).

--- (2018b), 'Mid-Term learning review of TI Integrity Pacts: Civil control mechanism for safeguarding EU funds project', (Brussels, Belgium: ODS).

--- (2018c), 'External learning review of the Create project', (Brussels, Belgium: ODS).

OECD (2009), 'OECD principles for integrity in public procurement', (Paris, France: OECD).

Pellini, Katja (2016), 'Learning and sustainability review - Civil society capacity building for preventive anti-corruption measures in reducing emissions from deforestation and forest degradation (2011-2013) and reducing emissions from deforestation and forest degradation governance and finance integrity project (2013-2016)', (Unknown: Unknown).

Persson, Alf and Tien Dung, Trinh (2015), 'Transparency International Vietnam programme "To contribute to effective implementation of anti-corruption policies and practice in government, business and society, 2013-2017" - Mid-Term Evaluation', (Vietnam: SIPU).

Rooij, Agnes, de and Berg, Ingrid, van den (2019), 'Final evaluation of the "Siemens Integrity Initiative Project" for Transparency International', (Berlin, Gernmany: Transparency International).

Schakel, Lydeke (2016), 'Learning review for Transparency International's Linida project', (The Hague, Netherlands: DeveWorks).

SDG Lead (2018), 'Final evaluation of the "REDD+ Integrity for Africa" programme', (Unknown: SDG Lead).

Smith, Jeremy, Clark, Martin, and Tibbett, Stephen (2019), 'Mid-term evaluation of the Transparency International project "Whistle-blower protection in Europe"', (Unknown: The Advocacy Hub).

The Governance Group (2019), 'Review of the Business Integrity Country Agenda (BICA) assessment framework and methodology', (Oslo, Norway: The Governance Group).

Transparency International (2011), 'Strategy 2015', (Berlin: Transparency International).

--- (2015a), 'Learning review report of the REDD+ Governance and finance integrity for Africa (REDD+IN) project', (Berlin, Germany: Transparency International).

--- (2015b), 'Together against corruption - Transparency International strategy 2020', (Berlin, Germany: Transparency International).

--- (2016), 'Transparency International Secretariat - Implementation plan', (Berlin, Germany: Transparency International).

--- (2017a), 'Transparency International's Asia Pacific regional programme - 2017 annual report', (Unknown: Transparency International).

--- (2017b), 'Sharaka - Fostering Public Finance Integrity and Asset Recovery, and Empowering People, Groups and Communities for a Corruption-Free MENA Region: Six months' narrative report', (Berlin: Transparency International).

--- (2017c), 'TI's Asia Pacific Regional Programme - Effective and accountable governance for sustainable growth: 2016 Annual Report', (Unkown: Transparency International).

--- (2018a), 'Accountable Grant I-ACT: Quarterly narrative report - Q4', (Berlin: Transparency International).

--- (2018b), 'Siemens Integrity Initiative - Final progress report', (Berlin: Transparency International).

--- (2019a), 'TI's Asia Pacific programme: Effective and accountable governance for sustainable growth - 2018 annual report'.

--- (2019b), 'Accountable Grant I-ACT: Quarterly narrative report - Q1', (Berlin: Transparency International).

--- (2019c), 'Grant for an action under a framework partnership: Annual narrative report 2018 - Annex VI', (Berlin: Transparency International).

--- (2019d), 'Global Anti-Corruption Consortium: Quarterly Report - Quarter 2, 2019', (Transparency International).

--- (2019e), 'Supporting Citizens in Fighting Corruption in the Western Balkans', (Berlin: Transparency International).

--- (2019f), 'Accountable Grant IACT: 2018 Q4 (October 2018 - December 2019)', (Berlin: Transparency International).

--- (2019g), 'Anti-corruption in focus: Thematic leadership for OGP', (Berlin: Transparency International).

--- (2020), 'Global Anti-Corruption Consortium: Quarterly Report - Quarter 3, 2019', (Berlin).

Transparency International Secretariat (2019), 'Land and corruption in Africa: Final project report to the land-enhancing governance for economic development (LEGEND)', (Berlin: Transparency International Secretariat).

Universalia Management Group (2019), 'Final evaluation of the project "Climate policy and finance integrity: Safeguarding the climate and climate finance against corruption', (Montreal, Canada: Universalia Management Group,,;).

Unknown (2017), 'Evaluation of the Transparency International project "Whistleblowing in Europe: Supporting the agents for change" funded by Adessium Foundation', (Unknown: Unknown).

--- (2019), 'One page note - evaluation report: Tracking Anti-Corruption Summit Commitments Project', (Unknown).

Washington-Sare, Chris (2016), 'Internal learning review - Fundraising from the public: The Panama Papers activities', (Unknown: Pentatonic Marketing & Communications).