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# Final Evaluation Report

Citizen Engagement for Public  
Integrity Project in the Western  
Balkans and Turkey

Lead Evaluator: Suzanne Mulcahy PhD

September 2025

# Acronyms

**ALAC** - Advocacy and Legal Advice Centre  
**BiH** - Bosnia and Herzegovina  
**CEPI** - Citizen Engagement for Public Integrity  
**CoSP** - Conference of States Parties  
**CSO** - Civil Society Organisation  
**DG ENEST** - Directorate-General for European Neighbourhood Policy and Enlargement Negotiations  
**DG NEAR** - Directorate-General for Neighbourhood and Enlargement Negotiations  
**EQ** - Evaluation Question  
**EU** - European Union  
**GIZ** - Deutsche Gesellschaft für Internationale Zusammenarbeit (German development agency)  
**ICSNA** - International Civil Society Network Alliance  
**KDI** - Kosova Democratic Institute  
**MANS** - Network for the Affirmation of the NGO Sector (Montenegro)  
**MEL** - Monitoring, Evaluation, and Learning  
**MTR** - Mid-Term Review  
**NGO** - Non-Governmental Organisation  
**NIS** - National Integrity System  
**OECD-DAC** - Organisation for Economic Co-operation and Development - Development Assistance Committee  
**OGP** - Open Government Partnership  
**RBM** - Results-Based Management  
**ROM** - Results-Oriented Monitoring  
**SIDA** - Swedish International Development Cooperation Agency  
**SOE** - State-Owned Enterprise  
**TI** - Transparency International  
**TI-S** - Transparency International Secretariat  
**UNCAC** - United Nations Convention Against Corruption  
**USAID** - United States Agency for International Development



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# Final Evaluation Report: Citizen Engagement for Public Integrity (CEPI) Project in the Western Balkans and Türkiye

**Lead Evaluator: Suzanne Mulcahy PhD**

## Executive Summary

The Citizen Engagement for Public Integrity (CEPI) project<sup>1</sup> represented a significant multi-country initiative funded by the European Commission (EC)'s DG ENEST (formerly DG NEAR), aiming to strengthen rule of law and address public integrity challenges across the Western Balkans and Türkiye from January 2022 to March 2025. The project was coordinated and implemented by Transparency International Secretariat (TI-S) in partnership with TI Bosnia and Herzegovina, KDI/TI-Kosovo, TI Macedonia, TI Serbia, and TI Türkiye and two CSO partners in Albania (IDM - Institute for Democracy and Mediation and AIS - Albanian Institute for Science) and a long-term TI partner organisation in Montenegro – MANS (Network for affirmation of NGO sector). This final independent evaluation involved collecting and analysing primary data (via in-depth interviews and an online snapshot survey) and secondary data (via a documentary review), in order to extract findings and draw conclusions about the project's implementation and achievements. The evaluation's scope covered six criteria: relevance/coherence, effectiveness, EU added value, impact, efficiency, and sustainability. As agreed in an inception report, the criteria of *Effectiveness*, *Impact* and *Sustainability* were considered the priority criteria and were given more weight in the evaluation research and analysis.

## Key Findings

### Relevance

The project demonstrated strong alignment with TI's global strategy and national partners' organisational priorities, with all partners stating that the project's objectives aligned fully or mostly with their national organisational priorities. EU funding and the TI brand provided legitimacy and facilitated access to key stakeholders. The NIS fed into EU enlargement-related processes, with several partners reporting that EU institutions used NIS findings in monitoring processes such as the annual enlargement reports and the EU Rule of Law reports.

### Effectiveness

The project successfully delivered comprehensive National Integrity System (NIS) assessments across seven countries, providing robust evidence for advocacy efforts. The evaluation's snapshot survey confirms the universal value of NIS reports, with all respondents identifying the NIS Assessment as among the project's most useful outputs. As confirmed by interviewees across all participating countries, the NIS reports became foundational tools for ongoing anti-corruption advocacy. A national partner interviewed for the evaluation, after explaining the NIS as a time and resource-intensive endeavour, summed it with '*but the NIS is worth it*' and noted the reports provided '*the framework for our discussions, for designing our future interventions.*' A Working Paper on the theme of Political

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<sup>1</sup> See [www.transparency.org/en/projects/western-balkans-turkey](http://www.transparency.org/en/projects/western-balkans-turkey)

Financing ('Bringing the Receipts'<sup>2</sup>) produced under the project was also considered by project partners to be a very useful output of the project, confirmed by both survey data and via interview testimony where it was often spontaneously mentioned as one of the project's successes.

CEPI demonstrated strong effectiveness in achieving its core objectives, particularly in evidence-based policy influence. The project exceeded its primary policy engagement target by 257%, achieving 54 instances where NIS recommendations were used by authorities against a target of 21. Yet beyond these numbers, the qualitative evidence reveals the depth of achievement: several national partners described how the application of the NIS methodology helped develop their organisations into recognised policy interlocutors rather than external critics. As one partner noted, the NIS *'puts us into a position to start working directly with a wider range of institutions'* (Albania) while another emphasised that *'through this project, we are strengthening our influence and they are recognising us as a relevant partner'* (Macedonia).

The project's civic engagement success was similarly substantive, with the monitoring data showing implementing partners developed 23 partnerships and fostering 42 joint actions—twice the expected number. The capacity building component reached 630 participants across the region, whereby knowledge was transferred to other CSOs and strong relationships were built. Multiple examples from the qualitative evidence support the monitoring data, for example one partner (Kosovo) found that other organisations began *'asking the TI chapter to take the lead on advocacy efforts,'* while another national partner (Macedonia) created an enduring *'platform of organisations for anti-corruption'* that continues using NIS research as its foundation.

Effectiveness did vary across national partners and depended largely on political contexts. Serbia's strong performance benefited from constitutional reform timing and dedicated advocacy focus due to TI Serbia having a reduced scope under the project (focused on NIS and advocacy), while Montenegro's success (11 instances) coincided with government transitions creating reform openings, the implementing partner being a recognised, strong policy interlocuter and their ability to leverage institutional partnerships. Other partners, particularly Bosnia and Türkiye, faced complex governance challenges and restrictive civic space, which in Türkiye's case fundamentally limited evidence-based advocacy potential.

As a regional project, CEPI sought to be more than the sum of its parts. It had mixed success in this regard. Regional advocacy was slow to get going but in the later stages of the project, collective advocacy efforts did open up new platforms for engagement through Open Government Partnership (OGP) and UN Convention Against Corruption (UNCAC) processes, with the aforementioned policy paper on political financing achieving particular success at the UNCAC Conference of States Parties (CoSP) in 2023. Several partners interviewed for the evaluation mentioned regional knowledge exchange as being an added benefit of the project. Examples of proactive regional learning beyond formal project coordination included the partners in Albania inviting Kosovar experts to share political financing regulation experiences. This peer-to-peer learning proved valuable: *"It was very useful for our colleagues from different NGOs to gain some knowledge, and to have some good conversation with experts [...] comparing the experience of civil society there and in Albania was very useful for us..."*

## Impact

While comprehensive systemic change requires sustained effort beyond any single project's timeframe, the evaluation found several examples of meaningful contributions to transparency and

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<sup>2</sup> See: [www.transparency.org/en/publications/bringing-the-receipts-political-finance-transparency-in-the-western-balkans-and-türkiye](https://www.transparency.org/en/publications/bringing-the-receipts-political-finance-transparency-in-the-western-balkans-and-türkiye)

accountability frameworks that could yield long-term impact. The most promising examples include direct legislative influence, with North Macedonia being incorporated into working groups for new whistleblower protection laws and anti-corruption legislation expected to be adopted by end-2025, Kosovo achieving concrete legislative changes on political financing and prosecutorial council reforms, Albania providing significant input to Parliamentary Commission action plans that incorporated NIS recommendations on state-owned enterprise oversight and public procurement reforms, and Serbia successfully engaging in constitutional reform and electoral reform processes where NIS evidence informed multiple legislative discussions and institutional consultations during a critical reform period.

The evaluation noted three patterns that appeared to be associated with stronger contributions to systemic change, though further research would be required to fully confirm these patterns: (1) Strong organisational capacity and expertise—partners with robust internal capabilities, effective human resources, and deep technical knowledge in relevant policy areas were better positioned to engage credibly with governmental and institutional stakeholders; (2) Strategic relationship leverage and political timing—stronger impact occurred when organisations could utilise existing relationships with government institutions while remaining adaptable to emerging opportunities, exemplified by TI Serbia's ability to navigate dual roles as institutional insiders and public watchdogs, and Kosovo's successful implementation during major legal and institutional reforms when they had established cooperation with newly empowered political actors; and (3) Adaptive advocacy approaches supported by evidence—the most effective implementing partners demonstrated ability to pivot between collaborative engagement (participating in parliamentary working groups and policy development) and public accountability (media engagement and public communication), using comprehensive research as a foundation for sustained advocacy pressure across different political contexts and civic space constraints.

## **Sustainability**

Several of the outputs of the project show good signs of sustainability – most notably the written outputs (NIS, Regional Report and Working paper) developed under CEPI and the CSO capacities that have been strengthened via the project, both of the project partners themselves and the other CSOs with whom they engaged. While TI-S stakeholders were confident of the sustainability of the NIS Tracking mechanism developed under the project, national partners were less aware of it and less convinced of its potential for sustainability. The Database of Corruption Cases, as previously mentioned, came to fruition later than planned and this limited its usefulness during the project implementation timeframe. Several partners also mentioned ongoing visibility and sustainability issues with the database. An overarching concern related to sustainability of anti-corruption efforts, that was echoed by all stakeholder groups, is the uncertain funding environment in the region and beyond.

## **Critical Implementation Challenges**

CEPI implementation faced significant challenges that limited the project's full potential. Just as previous evaluations (MTR July 2023 and EU ROM September 2024) had found, this final evaluation confirmed that resource constraints at TI-S, as well as mismatched expectations about the audience and methodological standards of the NIS, led to somewhat uneven implementation across partners. Many of the project's efficiency challenges were attributed back to a six-month delay in the hiring of a research coordinator at the start of the project, which also led to some confusion over which version of the NIS methodology would be applied. The timeline for the NIS was then somewhat squeezed and other outputs could not be given sufficient attention until later in the project. The streams of work were most delayed were the Database of Corruption Cases, whose utility suffered due to late delivery, and the civic engagement aspects at national level. The latter outcome area was an area of divergence,

with some partners excelling at engaging and building capacity of other CSOs, while others found the NIS overwhelming and the civic engagement activities took a backseat accordingly. Regarding the Database of Corruption Cases, several partners noted that the database's late delivery limited its utility. The survey data showed mixed appreciation of the database, with only 4 out of 10 respondents identifying it among the project's three most useful outputs, but all agreed it came too late to be useful, with one partner specifically noting that *"project outputs such as the database and tracking mechanism should be launched during the project implementation for better advocacy actions."*

There were some bottlenecks and delays in the NIS process, caused by a variety of factors. These included variability in the timeliness and quality of drafts that were sent by national partners for review by TI-S and resource constraints at TI Secretariat, particularly related to research support during peak periods. The volume and quality issues created an overwhelming workload for TI-S staff. As one team member noted: *"Overall, it was quite a high workload, because it's so many reports with very different quality. It simply wasn't manageable, even when emergency support was drafted in."* More significantly, mismatched expectations emerged between TI-S and national partners regarding the target audience, purpose and research standards required for NIS publication. These became evident during the review process, where TI-S vetted national partners' draft reports. The mismatch persisted although detailed training on NIS standards and processes were offered by TI-S to all implementing partners, though it should be noted some national researchers did not attend these sessions (because they joined later or for other reasons), potentially contributing to quality issues.

Both TI-S and national implementing partners experienced the feedback process through their own lenses, with some disagreement on responsibility for the issues. National partners noted that strict review requirements sometimes felt disconnected from local realities and TI-S's review process would have benefited from more regional expertise. TI-S colleagues, on the other hand, pointed to delays and gaps in submissions despite the guidance provided. These differing experiences occasionally created tension and slowed progress, but were ultimately managed through additional coordination and dialogue. These challenges present valuable learning opportunities for both TI-S and national chapters to develop more effective collaboration processes, clearer communication protocols, and the opportunity to re-open conversations about the purpose and audience of reports like the NIS, as well as agreed minimum standards on research quality and research ethics for future projects.

### **Summary Assessment**

The evaluation found important differences in experiences and reflections on CEPI's overall success and legacy.

Overall, the sentiment among national implementing partners was that CEPI was a success, with 7 out of 10 survey respondents rating CEPI as "Successful," and 3 out of 10 respondents rating it as "Very successful", with no negative ratings. While acknowledging the difficult and resource-intensive process required to produce the NIS and some methodological concerns, national chapters and partners consistently emphasised the enduring value of the NIS reports and their usefulness and relevance for advocacy work with governments and other stakeholders. The latter was also echoed by external interviewees who had interacted with national partners during CEPI. The project team at TI-S generally agreed that while the project had to overcome several well-documented implementation challenges, CEPI ultimately achieved its core objectives and produced valuable tools for ongoing anti-corruption advocacy in the region.

When reflecting on the project's legacy, TI-S staff focused more on the strategic value of emerging regional priorities and the project's contribution to strengthening TI's overall advocacy capacity in regional forums. Meanwhile, the donor emphasised the ongoing need for real-time, up-to-date

information on anti-corruption progress that could inform policy processes—a requirement that the lengthy NIS production cycle often cannot meet, leading some to prefer direct consultations over relying on published reports that quickly become outdated.

The evaluation's overarching conclusion is that CEPI demonstrates both the potential and the challenges of comprehensive regional anti-corruption programming, providing valuable lessons for enhanced regional cooperation and future cooperation between TI, EU institutions, and national anti-corruption advocates in the Western Balkans and beyond.

# 1. Introduction

## 1.1 About CEPI

The Citizen Engagement for Public Integrity (CEPI) project, funded by the European Union (formerly DG NEAR, now DG ENEST) and implemented by Transparency International (TI), aimed to strengthen the rule of law in Albania, Bosnia and Herzegovina (BiH), Kosovo\*, Montenegro, North Macedonia, Serbia, and Türkiye. Running from January 2022 to March 2025, the project addressed public integrity deficiencies by promoting evidence-based anti-corruption policymaking and fostering civic engagement, redesigned and updated a regional database of high-impact corruption cases, built the advocacy capacity of civil society organisations, and mobilised citizens to push for greater transparency and accountability. By engaging five TI National Chapters and three partner organisations (hereinafter collectively referred to as national implementing partners), the project aimed to produce valuable knowledge to support ongoing anti-corruption efforts in the region.

The theory of change/intervention logic at work is based on a dual approach to strengthen the rule of law and address public integrity deficiencies in seven target countries (Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, Serbia, and Türkiye). CEPI was designed to work through two interconnected pathways:

- Evidence generation leads to better policy: By producing rigorous assessments of institutional systems (via the NIS) and documenting corruption cases with social impact (via the cases database), the program provides decision-makers with the specific information needed to target reforms effectively.
- Strengthened civil society increases accountability: By building civil society capacity and supporting advocacy campaigns, the program creates pressure for implementation of integrity reforms.

The NIS assessments identify weaknesses in institutional frameworks, while the corruption case database documents how corruption affects citizens' lives. Together, these tools transform abstract concerns about corruption into specific areas for reform. The program then builds connections among civil society organisations, including those not traditionally focused on anti-corruption. This broader coalition develops campaigns that connect corruption to issues citizens care about—like healthcare, education, and environmental protection—creating broader public demand for accountability.

While the separation into distinct linear outcome areas is necessary for project management and accountability, it is important to recognise that, in reality, linearity should not be assumed as the two pathways are interconnected. The process of evidence generation for the NIS involves network-building with stakeholders who are also involved in decision-making. As the two pathways converge, ideally already in the research stage of the project, decision-makers begin using evidence to improve anti-corruption frameworks, while civil society partnerships create sustained pressure for implementation. This combination of technical knowledge and public demand creates the conditions necessary for meaningful reform.

The project logframe maps out success markers at outcome and output levels, measured through concrete indicators, as visualised in Figure 1.

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



Figure 1: CEPI outcome level indicators and targets (Source: Evaluator based on project documents)

Specific indicators at the output level are also provided in the project logframe. The project aims for sustainable impact by strengthening local organisations’ capacity, creating enduring networks, and developing resources that remain accessible after the initiative ends. By connecting anti-corruption work with issues citizens care about, it sought to create a constituency for integrity that can maintain momentum for reform beyond the project’s lifetime.

**1.2 CEPI's Main Project Activities**

At the heart of the project are the NIS assessments, which were applied across the 7 countries (Output 1.1). From 2022-2024, research teams conducted extensive documentary analysis and interviews with key stakeholders, as well as validating the findings with a multi-stakeholder advisory group. The NIS assessments represent a major investment in analytical work, with each country team evaluating institutional pillars including the judiciary, executive, legislature, anti-corruption agencies, civil society, and media. This methodical approach enabled the identification of specific governance gaps and provided evidence-based recommendations for strengthening integrity systems and the process of generating the NIS opened many doors to institutional stakeholders and policymakers. The countries of the region had all undertaken NIS assessments in the past, albeit 6-7 years before CEPI and using a slightly different methodology.

Additionally, a regional corruption case database was developed under the project, aiming to create a regional repository of corruption patterns and their impacts (Output 1.2). This was intended to be developed in parallel with the NIS assessments, but the case database suffered some delays, and was ultimately published at the tail end of the project.

The project also invested considerably in strengthening civil society's ability to advocate for integrity in the region (Output 2.1). Seven specialised anti-corruption toolkits were developed, providing local

organisations with practical resources for monitoring, advocacy, and engagement. These toolkits cover methodologies for investigating corruption, techniques for monitoring public procurement, strategies for effective advocacy, and approaches to citizen engagement. A series of workshops aimed to equip civil society representatives with advanced skills in data analysis, freedom of information requests, collaborative advocacy, and public communication on corruption issues. Partnership and network-building for collective action was another important strand of the CEPI project, engaging other like-minded CSOs to amplify the findings of the NIS assessments and other advocacy messages. Communications and advocacy activities (under Output 2.2) were also a significant aspect of the project, given that it is an evidence-based advocacy project at its core.

### 1.3 Summary of Political Context in which CEPI was operating

The project was operating in political contexts that were challenging for anti-corruption advocacy. This was most evident in Türkiye, where the context was characterised by an increasingly centralised executive, weakened checks and balances, weak parliamentary scrutiny with opposition parliamentarians facing judicial actions and even imprisonment on broad charges, all of which undermine political pluralism and stifle dissent and shrink the space for civil society to advocate for reform.<sup>3</sup>

The operating environment was also challenging in Bosnia, where the political context remains characterised by highly politicised decision-making processes, institutional fragmentation and insufficient cooperation between key stakeholders and governance entities. In addition, developments in the Republika Srpska entity of Bosnia, for example the attempt to push through the foreign agents' law and the high criminal penalties for defamation, severely impacted the environment for civil society and restricted freedom of expression and media freedom.<sup>4</sup>

The context in Montenegro during project implementation was characterised by chronic political instability and paralysis: Two governments collapsed in 2022 following no-confidence votes, followed by political gridlock where lawmakers were unable to form a new government.<sup>5</sup> Several controversies over the constitutional court ensured that key reform legislation stalled. An interviewee from Montenegro noted that despite promised reforms, almost nothing had happened due to political resistance and the above-mentioned crises.

Serbia's context has also been characterised by political turmoil since 2024, with President Vučić winning re-election in April 2022 amid allegations of media bias and misuse of public resources<sup>6</sup> and this was followed by a long period of major protests (starting in 2024 over environmental concerns and then escalating after the November 2024 Novi Sad train station collapse that killed 16 people, which many blamed on systemic corruption).<sup>7</sup> The mass protests may however be opening space and building momentum for more significant reforms.<sup>8</sup>

Albania, Kosovo and North Macedonia maintained functioning governments and relative stability, avoided major institutional crises and mass popular unrest.

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<sup>3</sup> European Commission (2023) Türkiye Report 2023: [https://enlargement.ec.europa.eu/turkiye-report-2023\\_en](https://enlargement.ec.europa.eu/turkiye-report-2023_en)

<sup>4</sup> European Commission (2024) Bosnia Report 2024: [https://enlargement.ec.europa.eu/document/download/451db011-6779-40ea-b34b-a0eeda451746\\_en?filename=Bosnia%20and%20Herzegovina%20Report%202024.pdf](https://enlargement.ec.europa.eu/document/download/451db011-6779-40ea-b34b-a0eeda451746_en?filename=Bosnia%20and%20Herzegovina%20Report%202024.pdf)

<sup>5</sup> See <https://freedomhouse.org/country/montenegro/freedom-world/2024>

<sup>6</sup> See <https://freedomhouse.org/country/serbia/freedom-world/2024>

<sup>7</sup> See <https://abcnews.go.com/International/wireStory/growing-protests-pose-challenge-serbias-populist-president-125535266>

<sup>8</sup> Source: Interview with external interviewee familiar with the context.

### 1.3 Evaluation Scope and Objectives

This final evaluation of the Citizen Engagement for Public Integrity (CEPI) project covers implementation across seven countries: Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, Serbia, and Türkiye from January 2022 to March 2025. The evaluation serves both accountability and learning purposes, assessing project performance against OECD-DAC criteria while identifying lessons for future programming. The evaluation builds on findings from the 2023 mid-term review (MTR) and 2024 EU Results-Oriented Monitoring (ROM) mission, focusing primarily on the criteria of *effectiveness*, *impact*, and *sustainability* while also providing lighter touch coverage of relevance/coherence, efficiency, and EU added value, as agreed in the inception report.

### 1.4 Methodology

The evaluation was conducted from April 2025 to August 2025. The evaluator employed a mixed-methods approach combining literature review and secondary documentary analysis, primary data collection via interviews and an online survey.

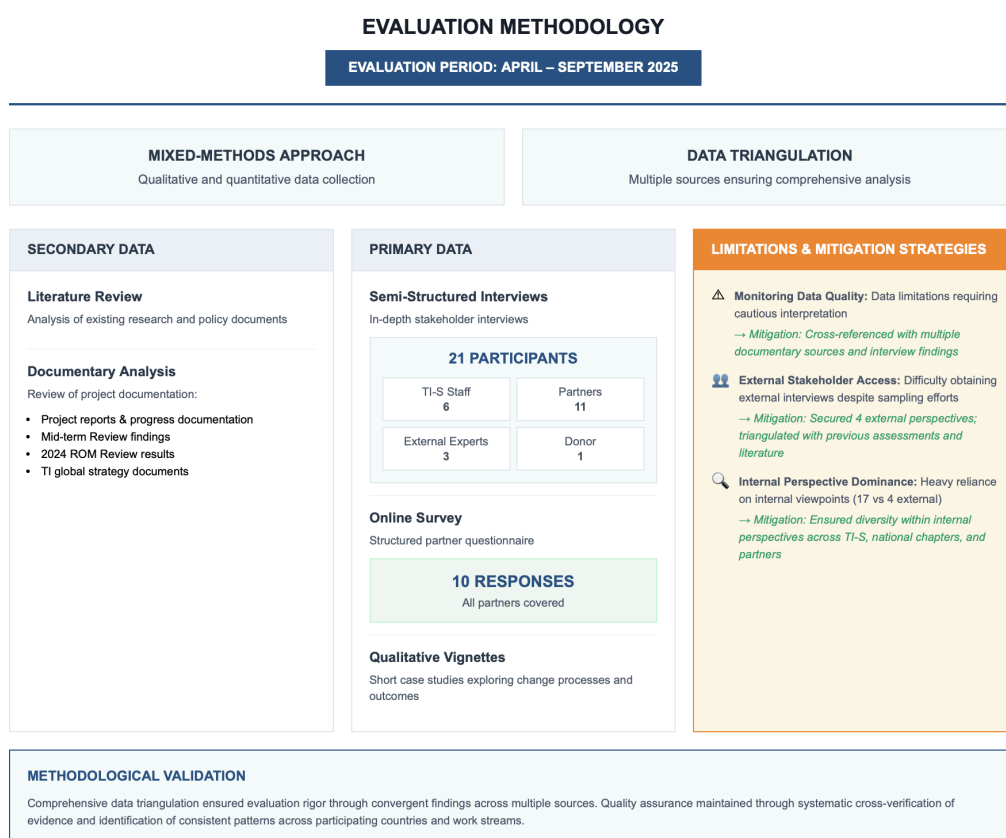


Figure 2: Evaluation Methodology Summary

More specifically, the evaluator carried out a comprehensive review of project documentation, progress reports, and previous external assessments (Mid-term Review and the donor’s 2024 Results-oriented Monitoring (ROM) Review findings and recommendations as well as TI global strategy and related documents. Following on from this, the evaluator conducted in-depth semi-structured interviews with 21 stakeholders including representatives of TI-S staff (6), representatives from all national implementing partners (11), external experts/stakeholders (3), and a representative of the donor (1). A snapshot online survey of project partners achieving 10 responses covering all participating partners, provided quantitative validation of qualitative findings.

The data was analysed using theory-based analysis to answer the evaluation questions set out in the inception report and to assess plausible linkages between project activities and observed changes. A key validation mechanism was the use of triangulation across multiple data sources and stakeholder perspectives. The evaluator also carefully compared prior review findings with stakeholder interview insights, to cross-reference and highlight new insights. Case study vignettes were selected based on initial insights from the data collection, and were chosen to reflect different operating environments, and to optimise learning and transferable lessons.

The methodology prioritised participatory and inclusive approaches, seeking representation across all implementing countries and stakeholder categories. Interview data was analysed thematically, with particular attention to areas of convergence and divergence within and between different stakeholder groups.

### **1.5 Limitations**

The evaluation faced several challenges and limitations. Monitoring data collected by the project had some limitations, which meant it needed to be carefully validated (*see section 4.1 for more details*). Another limitation faced by the evaluator was the difficulty in attracting external interviewees knowledgeable about the project. Despite using purposive and snowball sampling techniques, most individuals suggested by national implementing partners and global stakeholders as potential external interviewees did not respond, even after multiple contact attempts. The low response rate may have been partly attributable to the fieldwork taking place in summertime. A renewed effort in September 2025 yielded two additional external interviewees, bringing the total to 4 (2 external regional experts, one independent NIS expert and a representative of the donor). It should be noted that internal voices were themselves not monolithic and brought a diversity of perspectives and experiences, from the national implementing partners and international coordinating partner (TI-S). The evaluator carefully triangulated and cross-referenced the various perspectives with previous assessments and incorporated insights from the literature review and desk analysis, revealing both convergent findings and important nuances and implementation patterns across participating countries and streams of work.

### **1.5 Report Structure**

This report presents findings across the six evaluation criteria, followed by conclusions and recommendations. The 'Findings' section is structured according to the evaluation questions and sub-questions that were agreed upon in the inception report.

## 2. Findings

### 2.1 Relevance/Coherence: How coherent was the intervention logic and how well did the project outcomes align with national and regional strategic priorities?

*EQ1.1 To what extent was the project aligned with Transparency International's global strategy, national and regional strategies, and EU stakeholders' priorities?*

The evaluation confirmed the MTR and ROM mission's findings that CEPI's design responds to well-identified needs (those of citizens, CSOs and anti-corruption allies within institutions) and builds on a strong foundation of almost a decade of support from the European Commission to TI in the region. This strategic coherence was consistently confirmed at the national level, with national implementing partners noting the anti-corruption needs it sought to address were as relevant at the end of the project as they were at the beginning. This was also confirmed by external sources. Data from our snapshot survey validates CEPI's strategic alignment, with 7 out of 10 respondents rating project Objective 1 as "Fully aligned" with national anti-corruption priorities and slightly less enthusiasm for the alignment of the civic engagement objective (6 out of 10 rating 'fully aligned', 1 rating 'mostly aligned' and 2 rating it 'somewhat aligned' and 1 as 'not at all aligned').

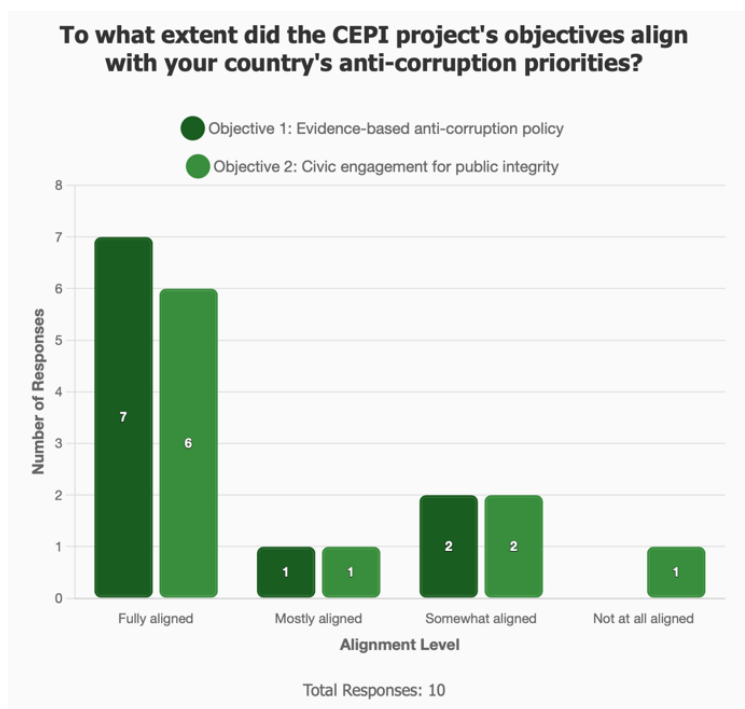


Figure 3: Graph showing partners' perceptions of CEPI's alignment with national anti-corruption priorities. Source: Evaluation snapshot survey (n=10)

This alignment is particularly important given the persistent corruption challenges in the region. According to public opinion survey data, over 80% of citizens in Albania, Montenegro, North Macedonia, and Serbia believe corruption is widespread in their countries, with nearly 40% feeling personally affected in their daily lives, according to the July 2025 Eurobarometer survey.<sup>9</sup> The same survey shows 81% agree that bribery or using personal connections is the standard way to access public administration jobs, and that high-level public appointments are highly politicised. Furthermore, trust in institutions is low, and only about 22% feel confident lodging complaints with

<sup>9</sup> See <https://europa.eu/eurobarometer/surveys/detail/3552>

the courts or prosecution services.<sup>10</sup> It is well documented that citizens demand transparent governance, stronger legal frameworks, and genuine accountability.<sup>11</sup> CEPI's approach of advocating for institutional reform, as well as building citizen engagement and awareness, is grounded in the literature and lived realities in the region and responds to these needs.

Notwithstanding the common trends in corruption across the region, the literature also suggests some variance in anti-corruption needs across the different Western Balkan countries. Gara and Buçaj (2025) argue that Albania and North Macedonia require attention to increasing the independence of anti-corruption agencies due to high perceived corruption levels, while Kosovo and Montenegro need strengthened judicial independence given their low trust in legal frameworks.<sup>12</sup> Despite these differences, the evaluation found that all stakeholders (TI-S, national implementing partners and external interviewees) concurred that the National Integrity System (NIS) framework, a key component of CEPI, provided a comprehensive approach allowing each country to address their specific priority issues through advocacy for tailored legal reforms, EU-aligned governance enhancements, and institutional trust-building measures, making it broadly applicable across the region despite the differing corruption challenges.

The evaluation also found that the CEPI project demonstrated strong strategic alignment with TI's global and national organisational priorities, and that appropriate collective regional priorities were identified during the project. CEPI shows alignment with TI's global strategy, particularly Strategic Objective 3 on political integrity. TI-S colleagues emphasised that *"definitely political integrity was front and centre"* in project design, though the project also meaningfully contributed to strategic objective 5 on justice and enforcement and strategic objective 6 on protecting civic space.<sup>13</sup> This coherence was evident through the project's focus on political financing as a key regional priority, which directly supports TI's Strategic Objective 3 on political integrity. TI-S colleagues specifically highlighted how the project's design ensured deliberate alignment with organisational goals from the outset, with political financing work serving as a clear example of how regional priorities, although chosen collectively by the national implementing partners, were aligned TI's global mandate on political integrity.

All 10 respondents to the snapshot survey stated that project activities enthusiastically confirmed that CEPI supported their own organisation's goals and strategy, either very well (8) or well (2). The NIS component, in particular its comprehensive nature, was seen as helpful for alignment with the national implementing partners' strategic priorities, which are based on thorough knowledge of the local needs related to anti-corruption. Several national implementing partners emphasised how the NIS methodology serves as an umbrella framework that enables comprehensive anti-corruption work across diverse thematic areas. A representative from one project partner noted that *"since it is connected with pretty much everything, it enabled us to monitor more closely various processes and to react in timely manner on all these issues that are somehow interconnected with NIS."* Similarly, another partner stressed the strategic alignment: *"the NIS is fully compatible with what we do. Because the largest program in our organisation is the governance program, which deals mostly with corruption efforts, ethics, integrity, public administration, integrity... it has provided the framework for our discussions, for designing our interventions."* The NIS thus allows national implementing partners

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<sup>10</sup> See <https://europa.eu/eurobarometer/surveys/detail/3552>

<sup>11</sup> See <https://www.ejosdr.com/download/corruption-and-economic-growth-in-the-western-balkans-a-legal-and-economic-perspective-from-the-16640.pdf>; [https://www.oecd.org/en/publications/economic-convergence-scoreboard-for-the-western-balkans-2025\\_bc0babf3-en/full-report/business-environment-cluster\\_5d7aef9e.html](https://www.oecd.org/en/publications/economic-convergence-scoreboard-for-the-western-balkans-2025_bc0babf3-en/full-report/business-environment-cluster_5d7aef9e.html)

<sup>12</sup> See Gara and Buçaj (2025) *"Corruption and economic growth in the Western Balkans: A legal and economic perspective from the Balkan public barometer."*

<sup>13</sup> See [www.transparency.org/en/publications/holding-power-to-account-a-global-strategy-against-corruption-2021-2030](http://www.transparency.org/en/publications/holding-power-to-account-a-global-strategy-against-corruption-2021-2030)

to address multiple advocacy priorities within a single coherent framework rather than pursuing fragmented thematic approaches.

A significant achievement of the CEPI project was the establishment of shared regional priorities through genuine consultation processes, which were appreciated by partners. Via a thorough bottom-up process, where national implementing partners presented national findings and priorities, two focus areas were identified as topics for regional collaboration, namely political financing and judicial accountability. A TI-S stakeholder noted: *"What I think we have managed to do, at least to a certain extent, is to bring some strategic alignment to our work in the region. Now we have two shared priority areas that all these chapters and partners are working on together, and they were defined by them, not by TI-S. This is new for the region and a positive step"*. Several national implementing partners confirmed this regional alignment as a positive outcome of the project. Of the two priorities, judicial accountability proved to be more difficult to work on regionally because of significant structural differences in the judicial and prosecutorial systems across the region, and also because of limited time and resources at TI-S to support multiple regional priorities. Political integrity and party-political financing were more accessible, relevant and appreciated by project partners as a topic for regional focus. There was also a clear strategic fit for TI-S, with Strategic Objective 3 on political integrity.

Project partners, both at TI-S and national level, recognised that policymakers at the regional and European level view the Western Balkan countries as one entity, which creates a strategic necessity for the organisations to present a unified front for advocacy purposes. As one stakeholder succinctly put it, *'since policymakers at the regional and European level do see us as one, we also on our side, then have to show up as one'*. Several partners problematised this conceptualisation of the region 'as one entity' and acknowledged the varying anti-corruption and governance frameworks and priorities across the Western Balkan countries, as one partner noted: *'Although a term has been coined to define the region (mostly for convenience and with a hint of European neo-colonialism) the realities on the ground are often quite distinct, making it difficult to reconcile differences.'* Notwithstanding this critique, partners saw the value of common regional outputs, and the most useful of those was seen as the regional working paper on political finance, which was broadly appreciated as an important and useful output of the project (5 out of 10 survey respondents placed it in their top 3 outputs). The regional report was also recognised as important output (4 out of 10 survey respondents placed it in their top three outputs) but proved more challenging to produce, and several interviewees noted it was ultimately less useful for them at national level. As one partner stated: *'the complexity (of national differences) poses a significant challenge to producing a regional report that accurately captures shared trends, challenges, and opportunities.'*

*EQ1.2 To what extent did the project contribute to advancing EU objectives in the Western Balkans and Türkiye (e.g., public integrity, transparency, EU Enlargement agenda)?*

The project made meaningful contributions to EU enlargement objectives in transparency and public integrity. The evaluation found evidence of strong EU institutional uptake, with several partners reporting systematic engagement: for example, one partner noted that *"we shared in timely manner our views which are sometimes copy pasted from NIS to be honest... And yes, the EU institutions use our findings in that material for EU progress reports"* and another stated *"we were invited to meetings regarding the judiciary, the anti-corruption reforms. Also, we have been invited to these consultation processes related to the annual reports."* Similar experiences were echoed across multiple national implementing partners, indicating successful integration of NIS findings into EU monitoring mechanisms. From the donor perspective, despite confirming the relevance for EU monitoring mechanisms, there was a concern that sometimes information in the NIS would be quickly out-of-date and would not provide the EU institutions with the required real-time information at the point where they need, for example, updates on an ongoing reform. This reveals a fundamental tension between the NIS methodology's comprehensive, periodic assessment approach and EU institutions' need for

real-time reform monitoring. National stakeholders for their part expressed a wish for more clarity on what information the EU needs from them and felt confident they could provide it.

A further vector via which the NIS intersected with the EU knowledge objectives are the European Commission's Rule of Law Reports, which examine developments in four key areas for the rule of law: the justice system, the anti-corruption framework, media pluralism and freedom across all EU Member States and, since 2024, four enlargement countries (Albania, Montenegro, North Macedonia and Serbia). The country chapters rely on a qualitative assessment carried out by the Commission and national implementing partners interviewed for the evaluation mentioned being approached and providing input (often based on the NIS research) to these EU Rule of Law reports. Interviewees felt their research messaging and relevant NIS findings had been well incorporated into those country reports and this was confirmed by an external stakeholder.

*EQ1.3 Was the intervention logic coherent: Were project activities and outputs consistent with the intended goals? To what extent was there coherence between project outputs and goals throughout implementation?*

In general, the project's intervention logic, connecting evidence-based research to advocacy efforts, was considered coherent and well-understood by implementing partners. All partners had experience with the NIS, having conducted such assessments before, and were well-versed in the evidence-based advocacy theory of change. The civic engagement activities – working with other CSOs and engaging with government - were described by one partner as 'our chapter's bread and butter' and the interplay between research and advocacy came naturally to most partners.

One part of the logic that was less well articulated was how the Corruption Case Database would integrate with other elements to add value and contribute to the overall goals. As a standalone product, the idea was quite clear – it was supposed to help bring into the public domain the most relevant corruption cases with social impact, promote public discussion and ultimately contribute to bottom-up pressure on decision-makers to effectuate reforms. How it knitted with the NIS and other project activities in practice, also due to timing issues, was unclear to national stakeholders, who saw it as somewhat unrelated to the project's other activities.

Interview data from global and national stakeholders confirmed that, from the outset, there was significant confusion about the database's fundamental purpose and how it would contribute to the project's overall objectives. When pressed to define the database's purpose, stakeholders tended to describe what it was not, struggling to articulate what it was actually meant to achieve. This uncertainty indicates a fundamental gap in articulating how the database would contribute to the project's overarching goals. Multiple stakeholders perceived the database as an additional burden rather than a naturally integrated component. This sentiment was echoed across different implementation levels, suggesting the database was conceived as a parallel deliverable rather feeding meaningfully into the advocacy activities at CEPI's core.

The disconnect between the database and the project's objectives is evident in the database's limited utility for advocacy work. Several national implementing partners reported that they couldn't effectively leverage the database because it arrived too late in the project cycle. One partner explained: *"the regional database came late so we didn't have any opportunity to promote it and use that tool in advocacy activity."* Rather than complementing other project activities, the database often competed with them for limited resources. Staff noted that while there had been adaptability in producing the NIS studies, this *"was potentially to the detriment of other deliverables of the project, especially the database."* This resource tension indicates that the intervention logic failed to consider how different project components would work together efficiently.

This disconnection was explained by global stakeholders as being due to the fact that the activity was added late in the design phase, at the donor's request, noting the donor's interest in building on a database attempt in a previous regional project that *"had much bigger design flaws."* A TI-S colleague explained that, at the time, the donor expressed interest in continuity and strengthened use of the (previous) database of 'grand corruption' cases created under a previous project. In designing CEPI the idea was to maintain continuity and bring improvements to the previous database work. The agreement was reached that the scope should be expanded to include cases with social impact. The database thus appears to have been included to satisfy external expectations rather than because it logically supported and enhanced the project's other elements. While the idea to maintain continuity and build on previous work was understandable, it proved to be one deliver too many for the project which already had a lot to deliver.

This evaluation confirms the ROM report finding that the project design was overly ambitious, especially given the number and complexity of outputs (NIS reports and the corruption database amongst other outputs), and the additional advocacy and capacity-building activities layered on top. It found the project's scope and expectations exceeded available resources, particularly in countries where TI has no formal national chapter, such as Albania, and in difficult operating contexts, such as Türkiye. This challenge was compounded by the donor's ambitious expectations during the design phase of the project.

*EQ1.4. To what extent were the project interventions complementary to other anti-corruption initiatives and avoiding duplication of effort?*

Interview and documentary evidence suggest that, overall, CEPI filled important gaps in the regional anti-corruption landscape whilst building constructively on existing processes and global TI advocacy efforts. The project demonstrated strong complementarity with global anti-corruption initiatives, particularly through TI's broader advocacy work. CEPI had significant success in connecting the project's regional findings with TI's global advocacy for an UNCAC resolution on transparency of political finance, where *"evidence from Western Balkans, also partially coming from NIS"* formed a substantial part of the evidence base. This connection illustrates how the project contributed to and enhanced existing global anti-corruption efforts. In addition, one TI-S colleague astutely noted that *'it reflects positively on visibility of priority issues in the region by presenting them outside of the regional / enlargement bubble and linking them to the global AC agenda'*. The project's engagement with Open Government Partnership (OGP) activities also demonstrated complementarity, with several national implementing partners using project findings at OGP events. One global stakeholder noted TI partners became more present *"as a region in OGP"* and that the NIS findings helped demonstrate how *"civil society is really marginalised from decision-making processes,"* suggesting the project enhanced existing OGP engagement.

At the national level, the timing of project implementation often aligned well with domestic reform processes, creating complementary rather than duplicative relationships. Albania's implementation coincided with a Parliamentary ad hoc Committee on anti-corruption, where *"the NIS was the most referenced product in the analysis that they had undertaken."* Similarly, Bosnia reported involvement in the preparation of new laws on judicial councils, with Venice Commission consultations incorporating their recommendations. These examples suggest the project successfully positioned itself to complement and inform ongoing national reform processes rather than operating in isolation.

The broader funding landscape in the region actually minimised risks of duplication. A global stakeholder noted there were very few other donors working at similar scale: *"The only other donor that was around at that time, but not at this scale, was German GIZ, who funded regional ALAC."* This sparse donor environment meant the project was filling a gap rather than duplicating existing efforts.

The project's design also built constructively on TI's previous work in the region, rather than duplicating it. All countries had previously conducted National Integrity System assessments, and while partners did not focus heavily on comparison over time, the new NIS assessments did build on rather than repeat previous efforts.

Integration with EU monitoring and reporting processes, as mentioned under EQ1.2 above, represented another significant area of complementarity.

*EQ1.5 To what extent was the project flexible enough to adapt to changing circumstances?*

The project was considered sufficiently flexible by most stakeholders. Survey respondents showed a generally positive assessments of project flexibility, with 3/10 rating it as "very flexible" and 7/10 as "somewhat flexible", with no negative ratings. Both the project documentation and interview data confirm several cases where the project team and the donor showed considerable flexibility in adapting to diverse and changing political circumstances across participating countries. This adaptability was particularly evident in Türkiye, where a stakeholder noted: *"due to political change in Türkiye, we have to change our direction a little bit, especially for our dissemination strategy and priorities."* Due to concerns about potential backlash and in order to safeguard TI Türkiye staff, TI-S and the donor approved a more muted dissemination strategy for the NIS results than would otherwise be the norm. This involved targeted outreach and presentation of results to stakeholders rather than seeking broad media coverage of the critical results. This was an appropriate adaptation given the difficult circumstances. The project also responded to the external limitation of Serbia's government objecting to certain citizen engagement components and the cases database, by having specific workplan for TI-Serbia focussing solely on NIS research and advocacy.

Another example of flexibility, this time at the national level, was Kosovo's adaptation to electoral cycles. In Kosovo there were parliamentary elections in the early stages of the project and while this was temporarily disruptive and caused some delays with fieldwork, ultimately they saw the arrival of a new government as an opportunity: *"when you get to meet them and provide them with a list of what needs to be done, and what is important in terms of anti-corruption efforts. There is a higher enthusiasm, optimism and sort of acceptance rate by the institutions at the first stages of institutional formation."* Montenegro also had to navigate changes in government through the project's lifetime, which meant for some periods that no counterparts were available or where new counterparts arrived, a learning curve and new relationships meant additional burden and slowing of progress. The partners are used to navigating such changes and did so admirably. The no-cost extension which was granted by the donor in 2024 was a further example of flexibility, to accommodate delays faced by partners and TI-S.

**2.2 Effectiveness: To what extent were the project's intended outputs and outcomes achieved?**

As a backdrop to the effectiveness assessment it is important to note that not all outputs were considered equally valuable to partners and that some were perceived as more useful than others.

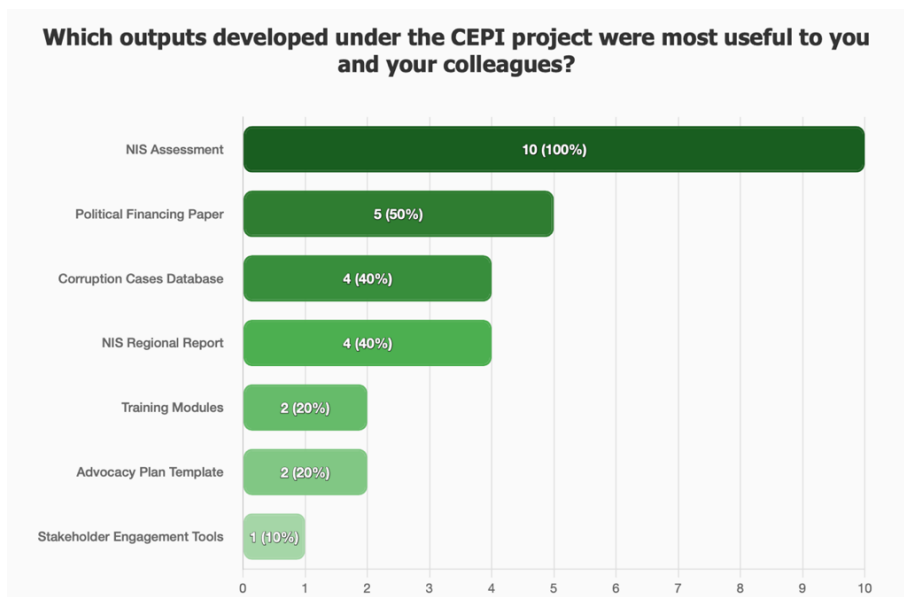


Figure 4: Graph showing partners' perceptions of CEPI's most useful outputs (Multiple choice, respondents selected up to 3)  
Source: Evaluation snapshot survey (n=10)

Survey data confirms partners' universal appreciation for NIS reports, with all 10 respondents identifying the NIS Assessment as among the three most useful project outputs from the CEPI project. The methodological rigour was praised by most national implementing partners. A partner noted: "NIS is the best tool at our disposal, not only to improve the internal capacities, or our organisation's relations to our close partners... The best part of NIS is that it puts us into a position to start working directly with a wider range of institutions." It should be noted that representatives from two implementing partners expressed a strong opinion that an NIS methodological overhaul was needed: 'Analysis of the 'S' in NIS, the system, is missing. There is no real appreciation of what is most important for the system to be robust and resilient against corruption. It doesn't capture that properly and needs to be revised' (Interview with National Partner).

The second 'most useful' output for partners was the Political Financing Working Paper 'Bringing the Receipts', which was noted for its usefulness in regional, but also in national advocacy. These insights on which outputs were most valued by partners provide a useful backdrop to understanding perceptions and experiences of the project's effectiveness.

The next section presents the findings related to effectiveness, assessing the successes and challenges faced in the delivery of both outputs and outcomes mapped out in CEPI's logical framework. The assessment begins by assessing achievement of outputs and progresses to present findings related to higher-order outcomes.

EQ2.1 To what extent have the project outputs and outcomes been achieved?

EQ2.2 Were any different results observed across countries or beneficiary groups, and what explains these differences?

Overall, the project demonstrated mixed performance in achieving its planned outputs and outcomes. While most logframe targets were met and several were exceeded, effectiveness was unevenly distributed across countries and activities, with some notable gaps and missed targets related to specific deliverables. The project showed over-performance on advocacy and civic engagement targets, whilst facing challenges in certain evidence-generation components. The evaluation found some issues related to consistent interpretation of logframe indicators, which form the basis of the internal monitoring data. Thus, this monitoring data had to be interpreted with caution and has been

triangulated with other sources in this evaluation, including the interview data which provides qualitative depth behind the logframe numbers.

*Outcome Area 1: To increase evidence-based anti-corruption policy-making and implementation*

### **Output 1.1: National Integrity System Assessments**

The NIS assessments carried out by project partners in each country formed the backbone of the CEPI project. All NIS-related planned national and regional assessment reports can be considered successfully completed. This represents a significant accomplishment given the complexity and resource-intensive nature of the NIS. While North Macedonia, Albania, Bosnia and Herzegovina, Kosovo, Serbia, finalised and published their NIS reports in 2023, Montenegro and Türkiye's came later, in 2024. In Türkiye, as previously mentioned, due to the political environment and security risks to national staff, the organisation agreed on a different dissemination strategy with targeted publications of concise summaries (2-3 pages), closed-door meetings, round table discussions and policy proposals. All partners felt that the delivery of their NIS assessment, despite challenges in the process, was a considerable achievement of the project. Dissemination of the NIS reports and recommendations showed mixed results. An analysis of the final logframe provided to the evaluator by TI-S showed that hard-copy distribution achieved only 63% of target (1,703 against 2,700 planned), whilst electronic downloads reached 80% (4,004 against 5,000 target). The publication of the online NIS tracking mechanism tool<sup>14</sup> towards the end of the project represented an important innovation, as it provides a sustainable platform for monitoring implementation of recommendations beyond the project period.

### **Output 1.2: Corruption Cases Database**

The project also successfully built and published a comprehensive database of corruption cases with social impact across participating countries, albeit publishing it later in the project than originally planned and failing to achieve the targeted number of cases. By the time of this evaluation, the database included 120 published cases<sup>15</sup>, falling well short of the target of 180 cases. While the consolidated logframe provided to the evaluator reported that 163 cases had been delivered, this number is misleading as it relates to the number of cases *provided* by the partners but not to the number of cases *published*. The evaluator found that 163 cases had indeed been collected from national implementing partners but that each of those cases required thorough fact-checking, libel-checking and additional analysis before ultimately being included in the published database. The logframe indicator clearly mentions 'published' and not 'collected cases' and should therefore be corrected downwards to reflect the 120 cases that were published. The final published database shows significant variation in the number of cases per country: Albania (22), Kosovo (31), Montenegro (15) and North Macedonia (22) Bosnia and Herzegovina (19) and Türkiye (8). There are 3 cases from Serbia included in the database, however Serbia did not formally participate in case collection due to governmental restrictions (its agreed focus was on additional policy-related deliverables connected to constitutional reform efforts during the project period).

A critical gap emerged in database utilisation, with 5,300 visitors recorded at the time of writing, against a target of 10,000, indicating uptake fell short of expectations. National and global stakeholders echoed that promotion and accessibility of the database fell short of expectations, largely but not only due to the late timing of the database's publication. Many stakeholders mentioned they were unsure how to use the database in their national work, as the cases are already well known so it is not news-worthy material. A TI-S colleague provided a comprehensive critique: *"I think*

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<sup>14</sup> See [www.transparency.org/en/nis/countries](http://www.transparency.org/en/nis/countries)

<sup>15</sup> See [www.transparency.org/en/cepi/cases](http://www.transparency.org/en/cepi/cases)

generally the idea of the databases and platforms is a waste... 99% of those is in an artificial thing. That is usually pushed by the donors." The same interviewee detailed systematic workflow issues with an 'over-complicated' review and checking process involving several steps, some of which seemed a duplication of effort. National implementing partners expressed frustration with timing and utility. As a representative of national implementing partner noted: "Unfortunately, we didn't have it until the end of the project... and so unfortunately, we didn't use it in the right way, this database, since it was published very late." Several national implementing partners also mentioned ongoing visibility and sustainability issues with the database, which is hosted on the TI-S website, with two interviewees spontaneously mentioning they were unable to locate the database on the TI-S website using the search function. This was confirmed by the evaluator to be the case, although a google search brought up the database so this appears to be an issue with the TI-S website search function. Global stakeholders mentioned the hosting of the database on the TI-S global website was actually intentional and a sustainability mechanism, as micro-sites tend to fall into disuse after project's finish. Both the timing and lack of clarity on the purpose of the database are likely to limit its intended impact on public awareness and accountability.

### Outcome 1: Higher order policy achievement (policy performance and stakeholder commitment)

Under Outcome 1, the project expected to generate evidence-based policy influence, measured with two indicators (# of instances where key domestic decision-makers use knowledge from NIS recommendations and database to preserve, improve or create anti-corruption frameworks and # of incidents where domestic stakeholders demonstrate commitments to implement NIS recommendations) and the evaluation finds that it exceeded expectations under this outcome. These two indicators are closely related, although each reflects different aspects of influence and institutional engagement. While the factors affecting them may be similar, they may not always be fully aligned—it is possible to move the needle on policy without vocal stakeholder commitments, and conversely, stakeholder commitments may not always translate into tangible policy outcomes. The data shows that whilst some countries like Montenegro achieved strong performance in both areas, others like Serbia focused more heavily on concrete policy wins despite moderate commitment levels.

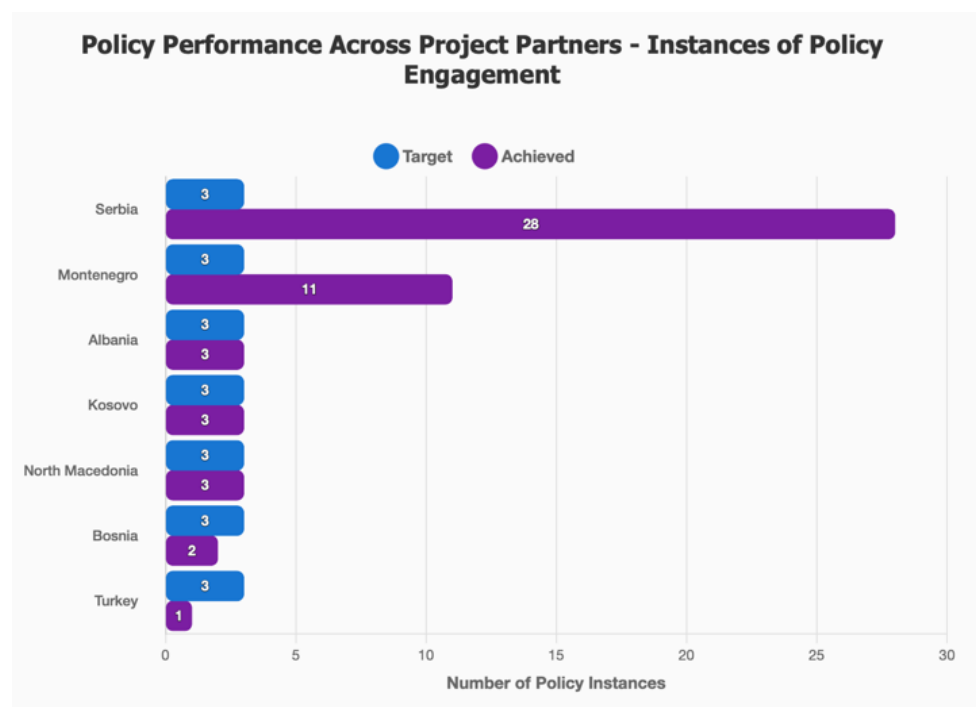


Figure 5: Policy Performance Analysis Across Countries

The logframe notes 55 instances where NIS recommendations (and database) were used by authorities against a target of 21, representing 262% of the target. Stakeholder commitment to implementing NIS recommendations also exceeded its target with the logframe noting 37 recorded commitments against the target of 21. The level of overachievement of the targets suggests the original targets may have been under-ambitious and/or could have been differentiated by country, especially in cases such as Serbia (where reduced scope of activities allowed for more attention to advocacy and justifiably higher targets).

<b>Country</b>	<b>Policy Performance (Target: 21)</b>	<b>Stakeholder Commitment (Target: 21)</b>	<b>Key Strategic Characteristics</b>
<b>Serbia</b>	28	5	Reduced scope allowing for extra bandwidth; policy-focused approach and pre-established institutional partnerships
<b>Montenegro</b>	11	15	Strong performance across both metrics; pre-established institutional partnerships
<b>Bosnia</b>	6	6	Strategic adaptation despite complex governance challenges (institutional fragmentation and stagnation)
<b>Kosovo</b>	3	5	Targeted effectiveness; strong coalition-building approach
<b>North Macedonia</b>	3	2	Competent balanced performance, focused attention on small number of policy issues
<b>Albania</b>	3	2	Solid policy achievement; moderate commitment levels
<b>Turkey</b>	1	2	Low achievement, constrained by restrictive civic space
<b>TOTAL</b>	<b>55</b>	<b>37</b>	

*Table 1: Combined Performance Analysis Across Countries*

The interview and survey data confirms that the NIS assessments in particular gained substantial traction with government institutions across the region. National implementing partners provided many examples of successful institutional engagement and commitment to implement NIS recommendations, several of which were externally validated. The corruption cases database did not seem to generate uptake in the same vein, according to interviewees.

Serbia achieved exceptional policy performance (28 instances vs. target of 3) through strategic institutional engagement rather than formal stakeholder processes. The disparity between high policy instances and moderate commitment levels can be explained by their pragmatic strategy that prioritised concrete policy wins using deep institutional engagement over formal stakeholder declarations, a strategy they felt was more likely to yield impact. TI Serbia's director chaired parliamentary working groups on electoral reform and contributed to national anti-corruption strategy development. Key victories included forcing withdrawal of the controversial draft Law on Management of Companies Owned by the Republic of Serbia, preventing judiciary exclusion from conflict of interest laws, and securing legislative amendments across political financing and procurement reforms. By concentrating on policy engagement over other project components, they

positioned themselves within formal processes to achieve concrete policy wins across government branches. [See Vignette on Serbia]

Montenegro demonstrated strong performance across both metrics (policy performance and stakeholder commitments) with 11 policy instances and 15 stakeholder commitments, despite a context where reform was challenging to achieve (see Introduction: Political Context section). The implementing partner was actively involved in political finance reform, with a new law on political financing presented during the project period. Their strong stakeholder commitment levels were explained by an interviewee from the implementing partner: *'formal commitments are easier to give but don't always translate into reforms'*.

Bosnia recorded solid performance on both indicators with 6 policy instances and 6 stakeholder commitments, which is impressive considering they were operating in a challenging governance environment. The country's complex institutional structure features a highly decentralised structure with multiple levels of governance and a lack of functional coordination and policy-making mechanisms and processes across and within the entities. TI Bosnia's achievements under CEPI included influencing access to information law changes, becoming the only CSO directly involved in preparing new judicial prosecutorial council legislation, and strategically contributing to stopping harmful foreign agent law adoption through Constitutional Court preparation. They used public events to elicit stakeholder commitments, which could later be referenced to apply pressure for reforms to be pushed through. The partner described their approach: *'we used those public events to draw attention to issues that are most important in the moment, to get commitments said out loud, and that approach proved quite successful.'* They also worked well in coalition with other like-minded organisations. An external stakeholder (from another Bosnian CSO) confirmed Bosnia's role as a knowledge hub, stating: *'whenever we have some sort of area or niche that is tricky for us, we always resort to our colleagues in Transparency International... They have very extensive knowledge, and they are not reluctant to share that.'*

TI Bosnia also provided an example of how stopping backsliding can be just as important as promoting a new policy. As a representative from the implementing partner, which was confirmed by an external stakeholder, noted: *'we managed to stop adoption of foreign agent law, but unfortunately, at the end it was adopted by government subsequent Parliament. But it is, it is cancelled by constitutional court... we have prepared everything for the appellation to the Constitutional court.'* Thus, while the challenging political environment in Bosnia somewhat tempered institutional uptake of recommendations despite the quality of the research produced, their strategic adaptation demonstrates how sophisticated legal expertise, deep coalition-building, and flexible event management can overcome structural governance challenges to achieve both policy influence and stakeholder engagement.

Kosovo met its policy performance targets with 3 instances whilst exceeding stakeholder commitment expectations with 5 instances. According to the implementing partner, the government's law on political finances incorporated most recommendations stemming from NIS analysis, whilst the law on prosecutorial council included five of eight specific recommendations that the implementing partner had advocated. Kosovo's implementing partner explained their coalition-building approach: *'we managed to form many sort of formal and informal coalitions with NGOs which we're actually asking [our organisation] to take the lead on advocacy efforts.'* This approach generated both concrete legislative victories and broader support networks, demonstrating how coalition-building can amplify impact when political windows open. The higher commitment levels relative to policy instances suggest Kosovo's strategy successfully built institutional support that may translate into future policy wins.

North Macedonia likewise met policy targets with 3 instances and recorded 2 instances of stakeholder commitment. According to the implementing partner, government officials contacted them when drafting public enterprise legislation, and the government subsequently included the organisation in working groups developing whistleblower protection laws and corruption prevention amendments. Most notably, the State Audit Office, which received the highest NIS 'pillar' score, actively promoted the assessment and created materials highlighting their performance. The concrete achievements were based on formal institutional buy-in, with the State Audit Office's promotion providing an example of how positive assessments can generate institutional advocacy for anti-corruption work.<sup>16</sup>

Albania met policy targets with 3 instances whilst recording 2 stakeholder commitments against a target of 3. The parliamentary committee on good governance, anti-corruption, and rule of law drew extensively on NIS findings for their reform agenda through 2030, with the NIS reportedly being the most referenced product in the anti-corruption section when the committee published its analysis. Albania's moderate commitment levels relative to solid policy achievement suggest their approach focused more on technical parliamentary engagement rather than broader public endorsement strategies, representing solid but not exceptional performance in securing formal institutional acknowledgements. TI does not have national chapter in Albania, and the moderate performance may partly be attributed to that fact, as the two implementing organisations are outside the TI network and could not draw on TI's reputational strength and brand to the same extent as other implementing partners.

Turkey demonstrated limited performance across both metrics with only 1 policy instance and 2 stakeholder commitments against targets of 3 each. As an implementing partner representative explained: *"We couldn't share it [the NIS findings] that much because we don't know what is considered as disinformation and what is not. The law on disinformation is purposefully vague and in a way we have to self-censor."* The restrictive civic space environment, combined with organisational changes, severely constrained advocacy opportunities despite producing quality research. Turkey's experience demonstrates how restrictive political contexts can severely limit both policy engagement and the ability to secure formal institutional endorsements.

## **Outcome Area 2: To strengthen civic engagement and advocacy for public integrity, transparency and accountability.**

### **Output 2.1: Capacity Building for Civil Society**

According to the project's monitoring data, capacity building activities met or exceeded targets, and this was largely confirmed by the interview data, which showed a rich variety of capacity building efforts. The project developed 8 anti-corruption toolkits, meeting its target and capacity building workshops reached 637 participants across the region, exceeding the target of 500 participants. While each country (apart from Serbia, who was not included in this activity) had the same target of reaching 85 individuals, in reality there were stark differences in results across the national partners, with Bosnia engaging 67 individuals in training via 3 workshops, North Macedonia training 54 individuals, while Türkiye's monitoring data showing engagement of 216 participants in total. The evaluation found that this data needed to be treated with caution, as a closer examination of the MEL data revealed significant differences in interpretation of what 'counted' as capacity building and thus, the relevance and specific contribution of CEPI to these outputs is unclear. For example, TI Türkiye included its 2022 Summer School and the 2023 Autumn Schools focused on digital transparency and local governance under the output 2.1, two themes which are tangential to CEPI and the NIS but not

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<sup>16</sup> No external interviewees were available to validate these assertions.

derived from it. Additionally, meetings (such as TI Türkiye meeting with ICSNA and a TI Türkiye meeting with a period-positivity organisation named 'We need to talk') were included as capacity building when no training element was evident here. In contrast, North Macedonia only counted engagements that were very closely related to CEPI, namely a presentation of NIS results in Delchevo and a workshop on the resolutions adopted at the 10th UNCAC CoSP, December 2023. There thus appears to have been divergent understandings of which capacity-building efforts and interactions 'counted' here.

The second half of the project saw an acceleration in the number of CSO partnerships forged (Logframe Indicator 2.1.3), with the 2023 figure of 25 collaborative interactions between civil society organisations at local and regional level climbing to 81 collaborations by the project's end, exceeding the target of 50 interactions. These interactions with other CSOs helped build robust networks of anti-corruption advocates across the region. Montenegro emerged as particularly active in this area, hosting 30 networking events, while other countries contributed as follows: Albania (10 interactions), Bosnia and Herzegovina (7 interactions), Kosovo (7 interactions), North Macedonia (11 interactions), and Türkiye (12 interactions) and TI-S at the regional level (5 interactions).

## **Output 2.2: Fully fledged Advocacy Campaigns on Public Integrity are delivered**

Advocacy and communications campaign activities generally showed strong performance across most indicators. Awareness-raising and advocacy campaign plans exceeded targets considerably (16 against 7 planned), whilst citizen reach was exceptionally high, reaching over 3.2 million citizens against a target of 70,000. Given the known potential reach of digital and social media, these targets were overly modest. Additionally, one should note that many national partners could not isolate CEPI awareness-raising activities from their general awareness-raising activities, because CEPI was so well-knitted into their organisation's work. Thus, evaluating CEPI's specific contribution to this broad area of awareness-raising is challenging.

Notwithstanding this, it is laudable that the partners successfully leveraged both digital and non-digital platforms and media engagement was broad. The partners did generate substantial media attention throughout CEPI's implementation, with extensive coverage helping to amplify the project's impact and raise public awareness of corruption issues across the region. Media coverage exceeded expectations with 1,482 reports against 500 planned. The development of personal corruption stories achieved 109% of target (76 against 70 planned), though further work is needed in translating database content into accessible narratives for public engagement.

There were several stand-out campaigns and Serbia and Kosovo proved particularly active, reporting 5 and 4 advocacy campaigns respectively. These campaigns addressed critical issues including public procurement integrity, conflicts of interest, politicised judicial appointments, and transparency in public spending. A review of the types of campaigns reported on in the MEL data again shows divergent interpretations by partners of 'what counts' under this indicator (2.2.1 Number and description of targeted anti-corruption advocacy and campaign plans developed and implemented at beneficiary and regional levels) both in terms of the type of activity and the stage of development/implementation. More guidance on the MEL reporting appears to have been needed for some partners. While TI Türkiye reported a rather vague plan, not yet implemented, '*to empower CSOs by helping them solidify their positions and enhance their capacities*' under this indicator, KDI in Kosovo reported 4 distinct advocacy and communications campaigns that had already been fully implemented: 'Open the Wallets'; 'Immunize Against Corruption'; 'Electoral Integrity' and 'Zero Corruption'. The interviews revealed that TI Türkiye had in fact carried out some campaigns which could have been recorded in the MEL system, in particular the Transparency Pledge they implemented at local government level. One implementing partner expressed that more guidance from TI-S may

have been needed to strengthen their campaign activities. This was further evidenced by the fact that that partner couldn't fully utilise the allocated budget for the communications and advocacy part of the project: *"We didn't spend all of our money in the content (communications and advocacy) part because we didn't, we didn't know what to do; we spent some of them, I mean most of them, but it was like not in a planned and organised way. I think we may have needed some... more instructions on the advocacy part."* Staff turnover, especially the position of Executive Director which changed 4 times over the project's lifetime, undermined TI Türkiye's ability to develop strategic communications. Although this was discussed at several regional meetings, more intensive knowledge and experience sharing on communications aspects would have been welcome for less experienced partners. This was somewhat of a missed opportunity given that several of the partners are experienced and successful campaigning organisations.

Additionally, the survey indicated that awareness-raising was the area where partners felt CEPI had been most successful, as shown in Figure 6. This was followed by improved advocacy opportunities and enhanced internal capacities.

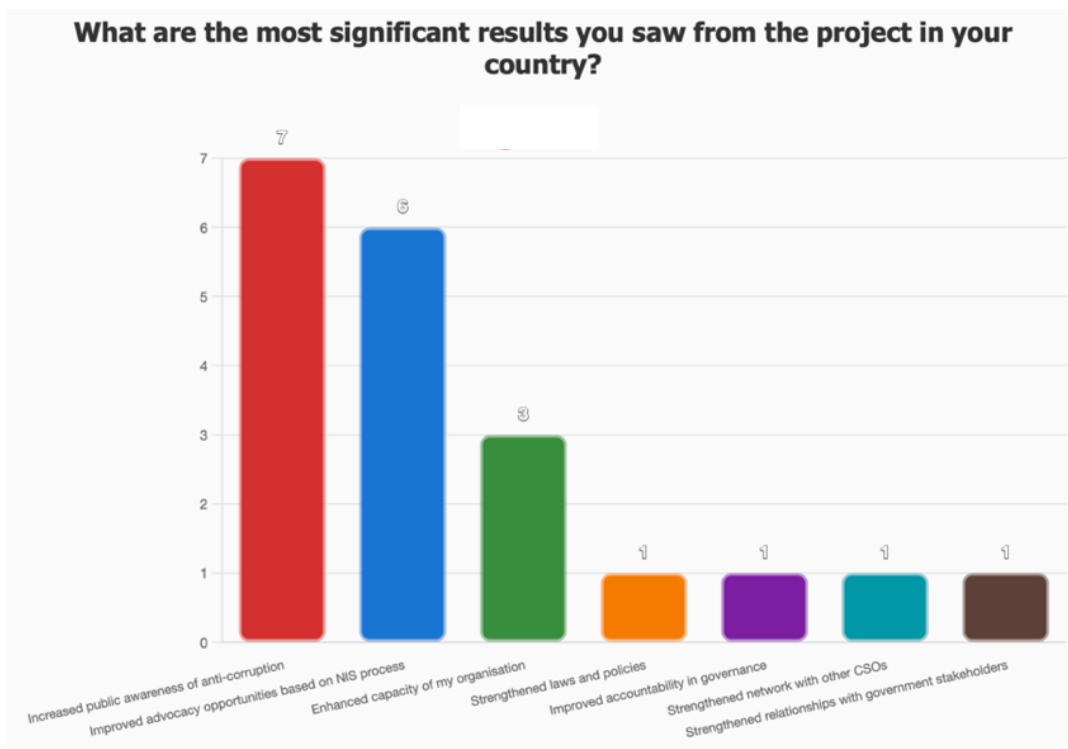


Figure 6: Partners perceptions of CEPI's most significant results in their country (Source: Evaluation Snapshot Survey, n=10)

## Outcome 2: Higher order Civic Engagement and Advocacy achievements

The project achieved its logframe targets for civic engagement, indicating successful implementation of joint advocacy and partnership activities. According to the self-reported data for civic engagement and advocacy (Outcome Indicator 2.1), national implementing partners developed 25 partnerships (exceeding the planned 18) and they reported having fostered 42 joint actions with civil society actors, delivering twice as many actions as expected (Outcome Indicator 2.2). Furthermore CEPI successfully allowed partners to engage decision-makers through advocacy efforts, the monitoring data showing 229 actual joint engagements with decision-makers versus the planned 70 (Outcome Indicator 2.3). The latter indicates that the CEPI project did allow national implementing partners to forge the link between evidence and policy engagement and to do so in coalition with other like-minded partners. Interview data provided many examples of implementing partners successfully working in coalition,

indicating that the project successfully built momentum beyond its immediate deliverables, creating sustained networks and advocacy capacity that continued generating results throughout the implementation period. What this civic engagement looked like in practice and the results it brought about varied considerably across partners, as evidenced by the variety of examples mentioned by interviewees.

TI Serbia achieved notable success in joint advocacy actions (Outcome Indicator 2.2), delivering 12 joint advocacy activities against a target of 3, often utilising their network of formal coalitions. The organisation participated in multiple platforms including the Coalition for Freedom of Access to Public Information, Three Freedom Platform, PrEUgovor Coalition (focused on EU accession reforms), Coalition OKO (an oversight/watchdog coalition), and the National Convention on the EU's Chapter 23 working group comprising around 50 organisations. This multi-layered coalition approach combines issue-specific coalitions focused on transparency and anti-corruption with broader democratic governance platforms, professional networks, and media partnerships with investigative journalism organisations like CINS (Center for Investigative Journalism of Serbia) and BIRN (Balkan Investigative Reporting Network). TI Serbia also leads multi-stakeholder parliamentary working groups that include government MPs, opposition MPs, and other NGOs, demonstrating their role as coalition convenors across different sectors. An external interviewee confirmed that the organisation often takes on the role of a coalition convener, with their staff taking leadership roles in multi-stakeholder initiatives. The electoral reform working group exemplifies this approach, where they chaired a coalition that brought together government MPs, opposition representatives, and other NGOs to work on legislative changes. This convening role allows them to bridge different sectors and political divides, creating dialogue opportunities that might not otherwise exist (See Vignette 3 for more details).

Montenegro's implementing partner (MANS) also demonstrated coalition-building across multiple platforms, reporting 4 partnerships and conducting 8 joint actions while engaging 37 decision-makers through joint advocacy efforts. Examples include the organisation leading initiatives with 16 NGOs on human rights issues, while also joining 100 international organisations calling for political finance transparency. MANS maintained active participation in regional and international forums while engaging high-level officials including the Vice President of the Government for Political System, Justice and Anti-Corruption, participating in legislative processes across multiple ministries and parliamentary committees.

TI Macedonia's approach showed how sustained coalition work could create lasting networks. The partners became part of a broader CSO '*platform of organisations for anti-corruption*'<sup>17</sup> that coordinated responses to current events, often using the NIS research as a foundation. Beyond this formal platform, TI Macedonia actively strengthened cooperation with women's organisations and other local organisations throughout the country through dedicated meetings and knowledge sharing, expanding their network beyond the capital and traditional anti-corruption partners. In Kosovo, the partner reported how other organisations eventually "*worked with us on joint actions and asked for KDI to take the lead on advocacy efforts*" on advocacy around various laws. This leadership role emerged organically from their research capacity and advocacy effectiveness. Albania worked strategically with business chambers and media organisations on specific legislation.

Conversely, TI Türkiye encountered significant difficulties in coalition building and decision-maker engagement, recording zero deliveries on the latter indicator against a planned 10. This can be attributed not only to the internal staff turnover in the national implementing partner but to the hostile environment for civil society organisations working on corruption and related issues. This

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<sup>17</sup> [www.antikorupcija.mk](http://www.antikorupcija.mk)

variation illustrates the crucial factor of civic space and openness of political institutions, which had a strong impact on degree of effectiveness of Outcome 2 in different countries.

The interview data suggests that successful collaborations often combined formal platform structures with informal networking relationships (especially with other CSOs working on similar or adjacent topics), with implementing partners further noting that the comprehensive NIS research provided credible evidence that other organisations could reference in joint advocacy efforts.

*EQ2.3 What internal and external factors contributed to progress or delays in achieving outputs and outcomes?*

As shown above, there were patterns of differential effectiveness across the partners involved in CEPI, with some partners achieving significant outcome-level successes whilst others struggled to deliver the planned outputs. We should note that particular policy or legislative successes are the result of unique political circumstances and windows of opportunity that cannot necessarily be replicated elsewhere. The factors facilitating and hindering effectiveness proved to be interconnected and context-specific but several patterns emerge which are interesting for future advocacy work and worthy of deeper consideration.

#### *Facilitating Factors*

Strong organisational capacity, the ability to leverage existing relationships with government institutions and favourable political timing were the factors most mentioned as facilitating effectiveness and these were found to be present in the cases of most successful advocacy found by this evaluation. Organisational capacity and effective human resources were also important facilitating factors, as one implementing partner noted: *'we set up a very good team of researchers that had specific knowledge on the pillars... rather than relying only on our own staff, which, while it had worked on most topics, it was not best versed in all pillars of the NIS so the external expertise helped a lot.'* An external stakeholder pointed to the deep expertise of the chapter representatives and how important this was for them to be taken seriously by governmental and institutional stakeholders.

CEPI proved most effective where national implementing partners could leverage existing relationships with government institutions and adapt flexibly to emerging opportunities. Serbia provides a clear example of this where the implementing partner successfully navigated their dual role as institutional insiders and public watchdogs. They maintained deep engagement within government processes, participating extensively in parliamentary working groups and policy development discussions. However, the organisation was also able to pivot into their watchdog role and use media engagement and public communication to raise awareness and apply pressure for change.

The most successful advocacy examples also benefitted from favourable political timing, as exemplified in Kosovo. A KDI representative attributed their policy success was to implementing the project *'while we're undergoing the biggest legal and practical reforms in regards to institutional functioning in respect to the fight against corruption efforts.'* They also benefited from existing relationships with newly empowered political actors: *'the current ruling party was back in opposition before, and by getting to work at the assembly. We had, of course, close cooperation with all the parties.'*

## *Hindering Factors*

Several factors hindered implementation, the most obvious being restrictive political environments. Türkiye experienced the most severe difficulties, with the political context fundamentally constraining their work: *"We had difficulty to find relevant data about corruption cases...Because the judiciary data is not very transparent."* A shrinking of civic space also constrained their work, making it difficult to call out corruption publicly. TI Bosnia also operated in a challenging context characterized by political fragmentation, complex institutions, institutional crises as well as escalating tensions between the central government and Republika Srpska. TI Bosnia's internal capacity and reputation in the country allowed them to navigate the challenges and implement broadly as planned. Montenegro also faced governance challenges with slow progress on institutional reforms and political uncertainty, while Serbia saw major civic upheaval during CEPI's implementation and TI Serbia's lack of involvement in some of CEPI's activities can be attributed to the shrinking civic space and government ability to constrain CSOs in the country.

Organisational instability was a hindering factor, as staff turnover and leadership changes disrupted project continuity and institutional memory. TI Türkiye experienced significant staff turnover which lost them time and increased workload for staff who stayed and new colleagues. Despite these constraints, TI Türkiye demonstrated resilience, re-igniting partnerships and forging new ones with like-minded CSOs, once the team had regrouped.

Another important internal factor hindering success were challenges in the research oversight process between TI-S and national level. [See Vignette 2 for further details]

### *EQ2.4 What good practices, successful experiences, or transferable examples have been identified?*

Several good practices, successful experiences and transferable examples emerge when analysing the data on effectiveness. At the country level, there were many reported examples of context-specific policy wins and civic engagement, some of which are detailed above. While particular policy or legislative successes were found to be the result of unique political circumstances and windows of opportunity that cannot necessarily be replicated elsewhere, transferable lessons can be drawn from the project's processes. Insights on what made processes effective or ineffective may offer some guidance for future anti-corruption work in the region and beyond.

Stakeholder validation and institutional ownership emerged as critical factors in ensuring research credibility and uptake. TI Macedonia's experience illustrates this approach well, as they systematically sent NIS findings to institutions before publication, giving each institution *'time to make a comment'* and ensuring recommendations were *'good for the implementation, not to have some recommendations to be something that is not possible.'* This process went beyond simple consultation to create genuine institutional investment and buy-in to the findings. This type of engagement was also seen in Serbia and Montenegro. Kosovo also reinforced this lesson, noting that successful engagement required giving institutions *'ownership in the process'* rather than simply presenting final products, involving them in *'whole procedures and processes with many layers of feedback.'* This approach, embedded in the NIS methodology but not always applied with rigour, proved more effective than traditional models where researchers conduct analysis in isolation and then try to convince institutions to accept their conclusions. Partners noted that this is a more time consuming method but the more successful advocacy examples seem to have had a strong underpinning in these stakeholder engagement elements.

Strategic timing, namely the ability to recognise and act quickly when political windows of opportunities arise, proved essential for translating research and advocacy into impact, though this

required significant flexibility from the partners. Albania's success in influencing parliamentary processes came from recognising that *'it was the best time to find a table'* when an *ad hoc* Parliamentary Commission coincidentally aligned with their research timeline. Similarly, Kosovo's policy achievements were facilitated by engaging with a new government that *'was interested and open to discuss'* reforms during its early, optimistic phase. TI Bosnia demonstrated this principle by using project flexibility to *'target issues that are most important at the moment'* rather than sticking rigidly to predetermined advocacy plans. The emerging lesson is not that timing can be controlled, but that successful advocacy requires organisational agility to recognise and pivot if necessary to capitalise on unexpected political openings.

Coalition building approaches showed promise across the region, though their effectiveness varied significantly based on local civil society landscapes and organisational capacities. Kosovo's success in forming *'many sort of formal and informal coalitions with NGOs'* demonstrated how comprehensive research could establish credibility that other organisations wanted to leverage. A notable pattern however was that the more successful coalition models built on existing networks, complementary organisational strengths, and shared strategic vision. A key lesson learned from this is that comprehensive research can serve as a catalyst for broader civil society coordination when organisations have the capacity and incentive to work together.

Partners praised but also craved more regional knowledge and experience sharing. Kosovo's Regional Political Financing Conference, which brought together not only other implementing partners from the region but also institutional stakeholders including the Albanian Central Election Commission and Montenegrin election authorities, was mentioned by several partners as an important forum for learning. On a smaller scale, the bilateral learning between Albania and Kosovo, whereby Albania invited experts from TI Kosovo to conduct masterclasses with Albanian civil society on electoral campaigns and finance, were welcomed as an important innovation. This practical knowledge transfer allowed Albanian organisations to analyse the extent to which Kosovo's more advanced judicial reform framework could serve as a model for their reforms.

A further lesson learned relates to the need for flexibility to allow partners to realign advocacy efforts in response to unexpected social crises. During the CEPI project, Serbia experienced a tragic event<sup>18</sup> that deeply shook society and redirected public attention and discourse. This required immediate adjustment of the project's communication and outreach strategies to remain relevant and sensitive to the prevailing public mood. This was possible due to the project's flexibility. The experience underscored the importance of strategic flexibility, knowing when to pause or adapt messaging, and how to link anti-corruption narratives to citizens' heightened concerns in times of collective trauma.

Several innovations are worth mentioning as possible lessons on how to leverage project outputs to create further spin-offs that may have additional impact. During CEPI, TI Macedonia developed a spin-off "corruption barometer" that analyses daily news events and categorises them as positive or negative developments, sent as regular updates to institutions and embassies. TI Macedonia received positive feedback from the embassies on this, as a useful input in the form of real-time corruption monitoring. In another innovation, TI Macedonia conducted a cost-benefit analysis connecting foreign funding to institutional performance on NIS indicators, asking *'how many of the resources from foreign funds are coming to our institutions, and how they are making progress on the NIS, depending on these resources.'* While it was not clear to the evaluator whether correlation and causation were sufficiently distinguished here, the core innovation - systematically connecting foreign aid flows to measurable

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<sup>18</sup> On 1 November 2024, the concrete canopy of the main railway station in Novi Sad, Serbia, collapsed onto the busy pavement below, killing 16 people and severely injuring one more. Novi Sad railway station canopy collapse - Wikipedia The collapse sparked a nationwide protest movement led primarily by university students demanding accountability for the disaster, the release of all related documentation, and broader anti-corruption measures.

governance outcomes - could be valuable in any aid-receiving context where donors and governments want to assess reform effectiveness. This evidence-based approach to aid effectiveness could help both recipients and donors make more strategic funding decisions, regardless of the specific analytical method used.

Several partners learned to emphasised the value of EU funding and TI branding for adding to the legitimacy of their work, while they noted the need to be strategic about when and how to emphasise these connections and when to downplay them.

#### Case Study Vignette 1: Serbia as Accidental Scope Management Case Study

TI Serbia's experience within the CEPI project provides valuable insights into project scope management through what became an unintended natural experiment in scope reduction. Due to government objections to EU-funded civil society activities, Serbia could not participate in citizen engagement components or case database development, creating a substantially narrower project scope than originally planned. As a representative from TI Serbia explained: *'The Serbian government objected to implementation of some parts of the overall project in Serbia... the result was that we did not participate in this whole group of activities for citizen involvement.'* Importantly, rather than viewing this as a setback, TI Serbia expressed no dissatisfaction with the resulting focus: *"We were quite happy to work on advocacy issues than to organise other civil society organisations."* This narrower scope allowed them to concentrate entirely on the NIS and related advocacy work, treating the project essentially as what one partner described as *"some kind of core support"* that enabled them to *"participate in practically every single opportunity to influence legislation or strategic documents."*

The results of this scope reduction were interesting. Despite having fewer formal deliverables than other chapters, TI Serbia demonstrated particularly strong implementation outcomes. Their representative noted that: *'as far as I understand, we had more products for more initiatives, advocacy initiatives than most of the chapters.'* This was indeed verified via documentary review and via external interviews.

This productivity translated into concrete policy influence across multiple areas. TI Serbia used the project's flexibility to engage with numerous reform processes simultaneously. Examples of the deep institutional engagement include TI Serbia's executive director chairing a parliamentary working group on electoral reform that included government and opposition MPs, using NIS findings to support reform arguments. The organisation also contributed to national anti-corruption strategy content, with an external stakeholder confirming widespread awareness, receptivity and uptake of the NIS.

The policy wins included securing acceptance of legislative amendments across political financing laws, public procurement procedures, and judicial reforms, working with the Ministry of Justice, National Assembly, and government agencies. The organisation initiated legal challenges, provided commentary on draft legislation, and engaged with oversight bodies like the Agency for Prevention of Corruption. Their advocacy achieved tangible outcomes including withdrawal of controversial legislation (the draft Law on the Management of Companies Owned by the Republic of Serbia), improved transparency in judicial appointments, enhanced public procurement monitoring, and strengthened access to information laws across executive, legislative, and judicial branches. These examples were verified with external interviewee who confirmed the widespread influence.

The NIS findings also informed their inputs to international processes including GRECO evaluations and OSCE/ODIHR recommendations, while the project's broad framework allowed them to respond to emerging opportunities like contributing to EU enlargement progress reports and responding to

national crises, including the tragic collapse of the Novi Sad railway station which resulted in student-led protests with anti-corruption messaging at their core.

Serbia's success stemmed partly from additional advocacy bandwidth gained by not participating in the Corruption Case database or civic engagement components, enabling concentrated focus on policy engagement and advocacy. Most notably, the organisation positioned itself strategically within formal policy processes and this yielded several policy wins. <sup>1</sup> An external stakeholder summarised their approach of combining deep engagement with strategic communications: *'when they [TI Serbia] detect problematic developments within these institutional processes, they shift to their watchdog role, using media engagement and public communication to raise awareness and apply pressure for change'*.

TI Serbia's experience suggests that the comprehensive project design may have been counterproductive for some contexts. TI Serbia were 'forced' to focus on core activities—research and advocacy— and this enabled deeper engagement with policy processes and more sustained influence on multiple reform tracks than might have been possible with the full range of planned activities that other implementing partners were dealing with.

*This Case Study Vignette was based on interviews with the national implementing partner, as well as an external interviewee familiar with the work of TI Serbia and the Serbian context and a documentary review.*

#### *EQ2.5 Have any changes in the overall regional context affected project implementation and results?*

CEPI's implementation was significantly shaped by major regional context changes that unfolded during the 2022-2025 period, fundamentally altering the operating environment for anti-corruption work across the Western Balkans. The most transformative shift came with Russia's invasion of Ukraine in February 2022, which created ripple effects throughout the region that partners had to navigate carefully. Türkiye found itself particularly affected by these broader geopolitical realignments, with representatives noting they had to "change our direction a little bit, especially for our dissemination strategy and priorities" as the political landscape shifted beneath them.

Elections in several of the countries created additional complications, with multiple countries experiencing the disruptive effects of political transitions during the project period. Kosovo's experience illustrated how electoral cycles could paralyse reform efforts, as their representative explained that *"elections, especially parliamentary ones, basically paralyse the work of all institutions, and no one is willing to get engaged in any sort of a systemic or legal change."* North Macedonia managed their transition more successfully after parliamentary and presidential elections, with the new government formed in June 2024, but the process required careful recalibration of advocacy strategies and relationship-building with new ministers.

A broader trend towards shrinking civic space also manifested across the region during this period. Bosnia's experience was particularly stark, where representatives noted the adoption of an amended criminal code in criminalisation of defamation and a foreign agent law that created a more restrictive environment for civil society work. This was accompanied by dramatic changes in the donor landscape, with several partners forced to let go staff members after USAID withdrew funding in 2025.

These changes in the regional context complicated already complex operating environments, where partners had to balance their anti-corruption advocacy with the realities of reduced civic space, political instability, and shifting international priorities that affected both funding streams and political receptivity to reform agendas. The project's flexibility proved crucial in allowing partners to adapt their approaches whilst maintaining focus on their core anti-corruption objectives despite these challenging regional dynamics.

## 2.3 EU Added-Value: What was the added value of EU funding and involvement in the project, compared to other potential donors or sources of support?

*EQ3.1 To what extent did the project benefit from being specifically funded by the EU, compared to other donors or no external funding?*

The evaluation found a nuanced and mixed assessment of CEPI having been specifically funded by the EU, with partners acknowledging both significant benefits and notable limitations compared to other donor experiences. Several interviewees mentioned how EU funding enhanced their work's perceived legitimacy and opened doors that might otherwise remain closed. A national partner noted that when promoting anti-corruption findings, *'it gets more attention if you say that this is a project with the methodology of Transparency International and funded by EU,'* suggesting the EU brand, particularly when combined with TI's well-respected brand, carried weight with stakeholders.

The operational aspects of EU funding presented more mixed experiences. Some partners struggled with bureaucratic requirements that sometimes hindered their ability to be agile in advocacy work. A national partner described challenges where *'sometimes it's problematic related to preparation of those things for publication, like press releases and other things'* due to different approaches between national partners and EU delegations. While national partners sometimes felt the need to be outspoken and critical on an issue, they noted that EU delegations tended and needed to be more diplomatic. This tension was particularly acute when trying to respond quickly to political developments, with one example where a national implementing partner described a case where their organisation and the EU donor disagreed on the wording of a press release. Ultimately the partner published the press release without mentioning the EU, in order to maintain their ability to speak directly about urgent issues. Another national partner explained that EU branding could actually be counterproductive in some contexts, as *'some people would think, okay, that might be some sort of conspiracy. Maybe EU wanted to send that message but didn't want to say them themselves.'* Several other partners mentioned enlargement fatigue and frustration with the EU in the region, which has damaged the brand among the general public.

When comparing EU funding to other donors, partners noted distinct differences in approach and flexibility. A national partner contrasted EU rules with previous UK support, explaining *'when we had UK support, we always had so-called action budget... it was based on results to produce this, and the cost will be that, and they don't care who is paid for that. That was another type of thinking'* compared to EU restrictions that were more focused on pre-determined activities and staffing arrangements rather than outcome-based funding. Another national partner provided perhaps the most critical assessment of EU funding visibility and effectiveness compared to other donors in the region, observing that *'until now, USAID programs, or US Embassy or different embassies have more - let's say more output, more visibility, more relevant projects in the country'*. Two partners mentioned that EU funds, while relatively widespread in the region, often lacked strategic focus and sometimes supported organisations without established track records, leading to ineffective programming.

The EU's role as the primary remaining donor in the region emerged as both an advantage and a constraint. As a national partner noted, *'now it's very important to see EU funding. It's very important, because it's the only big donor in the region'* after other donors like USAID, SIDA, and Switzerland had reduced or eliminated their presence. This has created a situation where EU funding is increasingly considered by national CSOs as essential not because of its superior approach, but because alternatives are disappearing, making partners more dependent on EU support despite its limitations.

Overall, the evaluation finds that the EU-added value lay in it lending legitimacy as a relatively well-trusted brand, but also due to its scale, duration, and regional scope rather than in superior operational approaches or enhanced legitimacy compared to other donors. Partners valued the EU's

commitment to staying engaged in the region and supporting comprehensive anti-corruption work, but found other donors' approaches sometimes more flexible and effective for responsive advocacy work, with several explicitly recommending greater procedural flexibility for future EU-funded initiatives.

*EQ3.2 What added value, if any, did EU Delegations in-country contribute to project implementation or results?*

Most partners reported being in regular contact with EU delegations in-country, however CEPI did not add any additional layers to these already existing relationships and the EU delegations were not seen as having greatly contributed to project implementation or results. Several partners highlighted positive working relationships with EU delegations, though a global stakeholder noted this varied significantly: *'some were more engaged than others, so it also depends a little bit on the delegation themselves.'* Most partners reported standard forms of delegation engagement, primarily through attendance at project events. A national partner noted that *'in our events, it was always the deputy ambassador for opening speech and some remarks,'* indicating that delegations provided ceremonial support and visibility for project activities. This type of engagement, while valuable for legitimacy, appears to have been largely symbolic rather than substantive.

## **2.4 Efficiency: To what extent were the project's resources and systems used efficiently to deliver results on time and within scope?**

*EQ4.1 Were the project's results-based management systems effective, inclusive, and fit for purpose?*

Interviewed partners did not express major concerns with the result-based management and reporting requirements of the project and they seemed to navigate reporting with relative ease. However, the evaluation did note that some logframe indicators elicited different understanding of 'what counts' across implementing partners, leading to some activities/results being reported under inappropriate indicators, potentially skewing the data.

The inclusivity framework within the logframe was sufficient with gender disaggregation requirements, but its design lacked mechanisms to ensure meaningful participation rather than mere attendance counting.<sup>19</sup> The logframe formally required age disaggregation for several indicators, but the evaluation found widespread non-reporting by age. The fact that so many countries reported zero youth participants suggests either the activities weren't designed to attract younger participants, or the age disaggregation requirement was somewhat tokenistic rather than reflecting genuine inclusive programming design.

Perhaps the most significant shortcoming of the RBM system was that it ultimately was not conducive to learning, and was seen by partners as more of a compliance exercise. As one global stakeholder noted, *'when we would ask for their reporting, or you know, when we would explain the log frame or the overall MEL processes, I think they would definitely see it as more of a compliance thing.'* While not uncommon in such projects, this was a missed opportunity to use the project to enhance national partners' MEL skills and move beyond compliance to adaptive learning. This is a common issue as implementing partners experience the MEL as extractive and don't see the benefit from it. To counter this, TI-S could share aggregated learning insights more intentionally back to all partners, showing how their input contributes to collective knowledge.

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<sup>19</sup> For example, the logframe could have included indicators such as number/percentage of workshop sessions led or co-facilitated by women and gender-diverse individuals; Documentation of women and marginalized genders taking on trainer/facilitator roles; Participant feedback disaggregated by gender.

EQ 4.2 Were resources used strategically and sufficiently to achieve the intended results? EQ 4.3 What resource gaps, if any, affected the implementation or outcomes of the project

Overall, as seen in Figure 7, partners expressed satisfaction with the level of funding provided under CEPI. The evaluation found that while country-level budgets may have been generally adequate for planned activities, the evaluation noted timing and coordination issues that reduced the strategic value of available resources.

#### How adequate was the CEPI budget from your perspective?

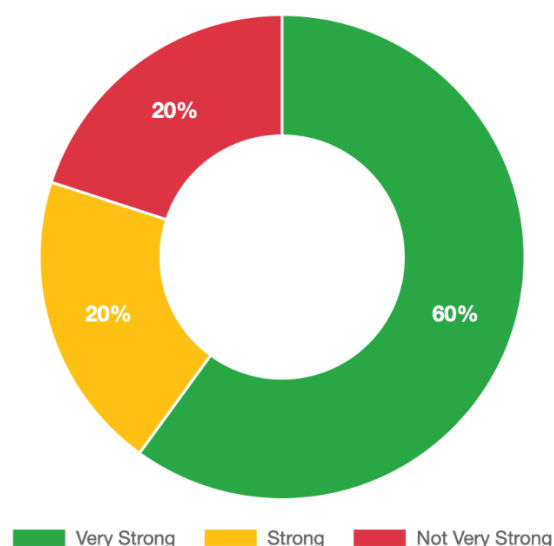


Figure 7: Partners' perceptions of CEPI's budget adequacy (Source: Evaluation Snapshot Survey, n=10)

Substantial time was lost during the period at the start of the project, where there was a delay in hiring the research coordinator role at TI-S. A national partner described how *'the first four or five months was wasting of time, waiting for the new NIS methodology'* whilst a TI-S stakeholder noted this delay *'led to database being a bit neglected.'* This initial inefficiency created cascading resource allocation problems throughout the project. The opportunity cost of this early delay forced reactive rather than strategic resource deployment throughout the remainder of the project period.

A key resource gap emerged in research oversight capacity, where a TI-S stakeholder acknowledged that *'even with increased allocation to 100% for research staff, we struggled to do everything, especially when it was this bottleneck period.'* The system was unable to deal with peak workload periods when multiple countries submitted NIS pillars simultaneously. This was compounded by hiring delays and periods where the Corruption Cases Database had no staff allocation. These staffing challenges created delays in the project and forced existing team members to absorb unreasonable workloads they could not be expected to handle effectively, creating a cycle of overstretch.

An external expert agreed that this resource issue had plagued the NIS in other regional projects and that there was no easy fix, apart from what the coordination team had already done (hired additional consultants for crunch periods). While national partners consistently highlighted having lost a lot of time explaining national contexts to reviewers unfamiliar with regional or national specifics, TI-S staff felt the delays were mostly caused by some implementing partners' lack of adherence to research standards. The evaluation noted that some of the disagreement here stems from different perceptions of the target audience for the NIS. Several national implementing partners noted that the NIS is *'for their national governmental and non-governmental stakeholders'* or *'people who are already very familiar with the context'*. One TI-S staff member expressed the view that the NIS audience is wider

than this: *'Since NIS reports are targeted at audiences not necessarily familiar with the country context, we asked chapters to include sufficient background so their claims and arguments could be understood...'*. This mismatch of understanding and expectations, which may have contributed to some of the issues experienced during the project, requires clarification starting with an internal conversation at TI.

The corruption case database also suffered from insufficient resource allocation, in terms of staffing. The challenges highlighted in the ROM review – *'The main challenge in establishing and properly populating the database is the lack of a sufficient number of quality control experts'* and *'There was no realistic assessment of the time and resources needed to complete the database'* – were confirmed by this evaluation.

Overall the evaluation confirms the ROM and MTR findings that the project's workplan was over-ambitious and that the number of deliverables was not realistic within the planned timeframe. While it was appropriate to scale up advocacy ambitions and build on the previous EU-funded project, the number of distinct deliverables (NIS reports and affiliated publications, Case Database, NIS Tracking Mechanism etc), as well as the capacity building, CSO engagement and advocacy activities, ultimately created overstretch for TI-S and implementing partners.

#### *EQ 4.4 Were activities implemented efficiently and in line with the planned schedule?*

The evaluation finds that whilst planned activities were ultimately delivered, implementation was characterised by significant delays and inefficiencies that undermined the planned schedule and reduced strategic impact of some deliverables. A no-cost extension allowed the project to be closed-out fully. The project experienced delays from the outset due to the aforementioned delay in hiring for the TI-S research coordinator role. These early inefficiencies were not merely inconvenient scheduling adjustments but fundamental disruptions that created cascading problems throughout the project lifecycle and limited the usefulness of some of the project outputs.

Implementation efficiency in the production of the NIS assessments was hampered primarily by mismatched expectations regarding research standards, significant delays in chapter submissions and delays in the TI-S review process. These dynamics caused frustration on both sides: implementing partners were overwhelmed by the research demands of the project, TI-S researchers were challenged by the extensive feedback process, and chapter researchers in turn experienced frustration with the resulting review bottlenecks."

Several implementing partners noted that the Case Database arrived too late for it to be used for effective advocacy. The ROM Review had already found these implementation challenges, noting *'there was no realistic assessment of the time and resources needed to complete the database'* and *identifying 'the lack of a sufficient number of quality control experts'* as a fundamental constraint that should have been anticipated during the planning phase. The evaluation confirms these earlier findings.

Similarly, the NIS tracking mechanism arrived very late in the project, severely limiting its utility for national advocacy work. A national partner noted the delayed timeline prevented effective utilisation during the project period when it could have demonstrated progress and maintained momentum for reform initiatives. This pattern of late delivery meant that several key outputs became post-project assets rather than implementation tools, fundamentally reducing their strategic value.

Despite these substantial schedule issues, the project ultimately delivered its planned outputs, demonstrating organisational resilience and partner commitment. All targeted NIS reports were

published, and advocacy activities continued throughout the implementation period, suggesting that whilst the project struggled with process efficiency, it maintained focus on output and outcome delivery. National implementing partners generally appreciated TI-S project management support despite resource constraint and the snapshot survey showed generally positive TI-S relationships (5/10 "Excellent," 5/10 "Good") and several partners expressed understanding and appreciation for the efforts of the global coordination team: *'they were very kind and responsive regarding communication corporation. However, as you can imagine, there were some late responses or delayed... due to lacking human resources in TI-S, they have they had some difficulties to cope with everything.'*

### **Case Study Vignette 2: Lessons from CEPI NIS review process**

The NIS review process during CEPI revealed fundamental lessons about managing complex multi-country research projects, highlighting deep tensions between different stakeholder perspectives on quality standards, contextual expertise, and research coordination approaches.

#### **Competing Narratives About Project Challenges**

The CEPI experience exposed contrasting views about where problems originated and how they should be addressed. National chapters and implementing partners felt that rigid oversight processes often conflicted with the need to explain complex local institutional arrangements. As one partner noted, *"limitation of text also causes a problem because you don't have enough space to explain the context of the country and then you can be criticised for being superficial."* From their perspective, having *"someone from the region"* would have been helpful, as the current approach required chapters to repeatedly *"explain things that would be commonly known for local experts."*

However, TI-S research coordinators viewed the challenges differently. They reported that many implementing partners missed deadlines and submitted work requiring rewrites due to methodological issues, including unsupported claims, missing sources, and scoring misalignment. From TI-S's perspective, what chapters framed as "contextual gaps" often reflected weak evidence presentation or challenges in making the local context accessible to global audiences.

#### **The Review Process Bottleneck: Multiple Contributing Factors**

Research coordination became resource-intensive during peak periods, but stakeholders disagreed about the root causes. Whilst TI-S increased coordinator allocation from 30-40% to 100% compared to previous projects, this still proved insufficient during crunch phases when multiple reports arrived simultaneously. However, the research coordinator recruitment was delayed by six months, leaving early project phases without adequate support, which had downstream effects.

In reality, the bottlenecks reflected both systemic and quality-related issues. Some delays stemmed from the sheer volume of simultaneous submissions overwhelming review capacity at TI-S. Other delays resulted from the need for extensive back-and-forth on submitted drafts. This back-and-forth was sometimes due to methodological concerns on the part of TI-S and other times due to partners not abiding by strict word limits, which implementing partners considered overly restrictive thus limiting space for contextual explanation that was later requested. Delays were also attributed to high volume or the contradictory nature of reviewer comments. TI-S eventually hired an additional former staff member to address backlogs, but tensions persisted about whether the review standards were appropriately calibrated.

#### **Standards vs. Autonomy: The Core Tension**

The project exposed fundamental disagreements about appropriate quality standards and review intensity. TI-S maintained that minimum research standards required proper sourcing, original

content, and clear methodology. They argued that outputs needed to be accessible to global and EU audiences, not just local experts, requiring clarity and comparability across countries.

National partners, however, experienced the review process as unnecessarily rigid. They struggled to provide the clarifications requested in the review process within the rigid word limits and felt that standardised approaches failed to accommodate legitimate differences in how evidence and institutional contexts should be presented across diverse national settings. This reflected deeper questions about whether the primary goal was producing rigorous comparative research or reports that would be appropriate in different local contexts, bearing in mind that one of key objectives of the NIS is for the process and product to serve as national advocacy tools.

As the back-and-forth created a backlog and further delays, TI-S colleagues from Projects team and Global Movement team eventually intervened directly, taking on review responsibilities and drafting sections to move the process forward. This ad-hoc solution succeeded in completing the NIS reports but had significant knock-on effects—the project team became overwhelmed and other outputs like the Database of Corruption Cases had to be deprioritised.

These emergency measures highlighted the fundamental mismatch between project ambitions and available resources, but TI-S and implementing partners again interpreted this differently. National implementing partners, as experienced advocates and researchers, welcome support but not prescriptive control, which goes against TI's decentralised model where national chapters are autonomous organisations within a global network. The review process may need to be recalibrated to take account of the TI-S/national chapter relationships and the ultimate aim of the reports being produced.

### **Divergent Views on Future Approaches**

The CEPI experience generated different recommendations depending on stakeholder perspective, which are not easily reconciled:

**From the national implementing partner viewpoint**, a more efficient approach would be to allow national chapters greater autonomy for quality assurance at the national level, using for example local advisory boards or peer review networks. Several national implementing partners mentioned that they routinely publish reports independently of TI-S. However, this would reduce the scope for comparison. Some national partners advocated a more focused NIS that only covers 'priority pillars'. This could be billed as an evolution of the NIS, a National Integrity Priorities study? National implementing partners and TI-S colleagues acknowledged concerns that this would undermine the comprehensiveness which is one of the unique selling points of the NIS.

**From the TI-S research coordination perspective**, a potential solution would be narrowing project scope to produce fewer but higher-quality outputs whilst maintaining comparative standards.<sup>20</sup>

Two TI-S colleagues advocated for structured methodologies emphasising specific, verifiable data collection rather than broad assessment prompts with multiple guiding questions. Taking this route would require a methodological overhaul of the NIS or perhaps more appropriately, the development of a new, more streamlined tool. It should be noted that there have been previous attempts to update the NIS methodology, but there was no internal consensus at TI-S to pursue a full upgrade.

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<sup>20</sup> Further ideas discussed in the Validation Meeting held on 22.09.2025 were narrowing the scope of the research review (TI-S would review the data (primary and secondary) collected by the national implementing partners but not the written reports) or that review panels including TI-S, national and regional experts could be constituted to validate scores across countries and calibrate where necessary. Any of these approaches would require a cost-benefit analysis and a frank discussion with national chapters to ensure their buy-in to a new approach.

## Lessons About Managing Multi-Stakeholder Research

The CEPI case ultimately demonstrates that successful multi-country research requires explicit negotiation about standards, key audiences, expectations, and decision-making authority rather than assuming these are shared. The competing narratives about quality, context, and coordination reveal how different stakeholders can experience the same events quite differently based on their roles, constraints, and priorities.

The experience calls for an internal process to rigorously evaluate the cost-benefit analysis of strict research standards versus the resources required to maintain them. This review should identify minimum non-negotiable standards that protect both national chapters and the TI brand from reputational damage, whilst distinguishing these from “desirable but resource-intensive” standards that might be applied more selectively based on project scope and available resources.

Future projects need frameworks that can accommodate both the legitimate need for comparative rigour and the equally legitimate need for contextual sensitivity and flexibility —recognising that tensions between these goals may be inherent rather than simply resolvable through better communication or resource allocation.

*EQ 4.5 To what extent have TI-S and project partners followed up on recommendations and agreed management response actions from the project mid-term review?*

The evaluation found that TI-S approached MTR follow-up with genuine organisational intent and a willingness to learn. TI-S formally accepted all MTR recommendations in their September 2023 management response. The evaluation found stronger follow-up on operational issues and more limited implementation of strategic suggestions, due to various constraints including organisational capacity and timeline limitations, and diverging stakeholder preferences.

The project team's reception of the MTR was generally positive but one colleague noted it was underwhelming, stating that the recommendations ‘weren't particularly transformative or...revolutionary’, expecting ‘more concrete, immediate kind of remedies that would...help us out now, not what we could use in, say, 5 years' time. There was thus somewhat of a disconnect between what the project team hoped to gain from the MTR process and what was delivered. The final evaluator also found some potential contradictions in the MTR recommendations, for example Recommendation 2.4<sup>21</sup> suggesting TI-S focus on advocacy activities that come 'naturally' to the movement and outsource data gathering and research to think-tanks and institutes, which belies the variety of capacities within different national implementing partners and also seems somewhat at odds with Recommendation 2.9 of targeting capacity building to develop more experienced research staff in each national chapter. If the recommendation to outsource was taken up, the recommendation on increasing research capacity would become less relevant and vice-versa.

Several MTR recommendations were fully implemented, particularly operational adjustments that fitted existing project management practices. The most clearly implemented recommendation was the no-cost extension (Rec 1.6). This extension was clearly necessary given project delays, and that this was successfully negotiated secured and implemented by the project team was important for a successful project close-out and should not be taken as self-evident. Regarding donor communication (Short-term Rec 2) regarding semi-formal quarterly EC communications and the evaluation found that TI-S maintained regular communication and responsive donor interactions. Regarding the MTR recommendation (Long-term Rec 6) on the ongoing use of preliminary NIS findings with authorities

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<sup>21</sup> The numbering used is drawn from TI-S Management response to the MTR published in September 2023: [TI-S CEPI MTR Management Response](#)

and EU stakeholders, the evaluation found strong evidence of continued engagement with stakeholders using NIS outputs.

TI-S also endeavoured to incorporate the MTR's suggestions on the final evaluation. The MTR made numerous suggestions regarding the final evaluation (Short term Rec 4 and 5, and Long-term Rec 2 and 8) recommending focus on: (1) performance against the LogFrame and MEL Plan, (2) best practices for strengthening the TI movement, (3) broader organisational processes beyond CEPI's scope including risk reduction and business continuity, (4) NIS methodology efficiency and effectiveness to inform future use, and (5) good practices for movement strengthening at TI-S level. The final evaluator noted these multiple focus areas did not take into account the limited budget available for that activity, suggesting the MTR was overly ambitious in expecting a single evaluation to comprehensively address all these analytical dimensions within limited resource constraints. TI-S did ensure stakeholder input into evaluation via a consultative approach to the design of the ToRs for the final evaluation and included several evaluation questions which went beyond project specificities to focus on broader impact and to extract lessons learned for the broader movement, as well as including questions on analysing NIS's fitness for purpose. The decision to prioritise on more forward-looking evaluation criteria – Effectiveness, Impact and Sustainability – was made with the intention of focussing on lessons learned for future projects within and beyond the region.

Some formal commitments from the management response did not translate into full implementation. Regarding Rec 1.1, the evaluation did not find evidence of the Advisory Board forum having been re-ignited, although TI-S did use existing platforms and informal mechanisms to foster and intensify further group exchanges and implementing partners appreciated these opportunities. Regarding the database protocol recommendation (1.3), TI-S indeed established a clear protocol for populating the new case template (although one interviewee reported this was overly complicated) but the database when eventually published was done so without the intended integration of historical case data.

The MTR recommendation (Rec 2.3) for developing lighter NIS tools saw limited follow-up, due to practical and organisational constraints. Such a pivot requires agreement and decision-making from several stakeholders within TI-S and the broader movement. Several TI-S and implementing partner representatives questioned whether such tools should maintain comprehensive nature that stakeholders appreciate, acknowledging however the fundamental tension that comprehensiveness is precisely what makes NIS valuable. The final evaluation finds the need for a detailed internal dialogue on the strategic value of the NIS and its future direction, as well re-examining the processes related to efficiently producing NIS assessments, in their current or future form. This recommendation therefore was not intended to be implemented before project end, but TI-S showed serious reflection for future projects, detailing concerns about *'undermining the logic that underpins the NIS.'*

The MTR included three recommendations specifically targeted at national chapters/partners: joint advocacy initiatives on regional topics (1.7), improving staffing structures to handle project challenges and staff turnover (1.8), and repurposing the CEPI MEL framework for other similar projects (2.13). The joint advocacy recommendation was successfully implemented through the establishment of two shared regional priorities (political party finance transparency and justice sector accountability) and TI-S also partially implemented the related regional strategy recommendation (2.1). While not yet forming a regional strategy, implementing partners interviewed for this evaluation confirmed the importance of these topics and their eagerness to continue collectively working on them. The staffing structure improvements (1.8) showed limited progress with capacity issues persisting at chapter level and no quick fix foreseeable given project funding cycles and recent reductions in donor budgets. The

evaluation also found no evidence that chapters had yet repurposed the MEL framework for other projects.

Overall, the evaluation found that TI-S and the national implementing partners were receptive to learning from the MTR but that the approach taken was more organic than systematic. One TI-S colleague's observation that most recommendations were *'something that we already planned to do or we're discussing'* suggests the MTR primarily validated existing thinking rather than driving significant course corrections. Organisational capacity, timeline limitations, and different stakeholder preferences created implementation barriers for the more strategic recommendations. The terms of reference for future mid-term reviews should specify that recommendations focus primarily on actionable, course-corrections rather than fundamental redesigns of complex, multi-stakeholder projects, which are more appropriate for end-term or programmatic evaluations.

## **2.5 Impact: To what extent has the project contributed to higher-order, long-term changes in transparency and accountability, and what is the evidence of its broader societal or systemic impact?**

*EQ5.1 Did the project contribute to long-term systemic change in transparency and accountability?  
EQ5.2 What evidence exists of improved policymaking and civic engagement as a result of the project?*

A project of this scale implemented over three years can only plausibly be expected make contributions to long-term systemic changes, which are influenced by many factors outside of such a project's control. The CEPI logframe therefore rightly included success indicators related to the project's *contribution* to strengthening the rule of law and addressing public integrity deficits, but did not seek direct attribution. It is important to situate the examples of impact within a broader understanding of difficult operating environments that the implementing partners had to navigate. In several cases, challenging political contexts limited the potential for systemic change or forced implementing partners to focus on trying to prevent backsliding rather than push for further reforms (see political context in Introduction).

Where changes were observed, several partners did note the difficulty of attributing specific changes to specific CEPI activities versus broader reform momentum and the ongoing efforts that the implementing organisations were working on over long periods of time. An interviewee from one partner noted that *'basically a project of this kind enabled us to have a stable financing for relatively longer period of time, several years, and since it is connected with pretty much everything it enabled us to produce to monitor more closely various processes and be involved in sustained advocacy'*, suggesting the project provided essential infrastructure for ongoing work rather than generating many discrete impacts.

Notwithstanding these caveats, the evaluation did find evidence of contributions to improved policy development across several countries, which could in time imply positive systemic changes and improved transparency and accountability. Stand-out examples of policy engagement with potential to contribute to longer term impact include TI Macedonia being included as representatives in working groups for developing a new draft law on protection of whistleblowers, and a working group for amending the law on prevention of corruption and conflict of interest. The national partner reported that NIS findings directly informed legislative drafting processes and expected adoption of the laws by the end of 2025, indicating ongoing influence on legal frameworks. Another example from Kosovo shows promise of significant policy impact (see Vignette 3), with concrete legislative changes reflecting the partner's project recommendations. Albania similarly demonstrated how project findings influenced high-level policy processes, with partners noting they had provided significant input to the Parliamentary Commission's action plan, which ultimately incorporated concerns about

oversight of state-owned enterprises (SOEs) and public procurement reforms, suggesting CEPI contributed to national anti-corruption strategy development, which could contribute to systemic change down the line. The impact of TI Serbia’s work has been well documented Vignette 1.

The project also contributed to regional policy influence through international forums. In the context of UNCAC, CEPI and particularly the NIS data from the project as well the paper on political finance (Bringing the Receipts) were used as part of the argument for a new resolution in transparency of political finance that TI was (and is still) proposing. The side event focused on this at the Atlanta CoSP. Was described by a national implementing partner representative as ‘a tremendous success’, representing a coordinated action across Western Balkan partners to influence ‘high-level international stakeholders and shape politics of those international organisations towards the region.’ TI-S Stakeholders confirmed the project had, for the first time, helped establish regional civil society as a credible voice in international anti-corruption discussions. Partners also reported that EU institutions increasingly solicited their expertise for policy development.

*EQ 5.3 How has the project enhanced the capacities of civil society organisations and stakeholders for sustained impact?*

Many national partners reported CEPI had had a positive impact on their own capacities and on the capacities of other CSOs who they collaborated with on governance and related issues. No baseline capacity assessment was conducted but the survey results suggest that most partners felt CSO capacities had been at least moderately strengthened and the qualitative evidence suggests there were contributions to increased capacities across several key areas.

**To what extent has the project strengthened the capacity of local CSOs to continue their anti-corruption work?**

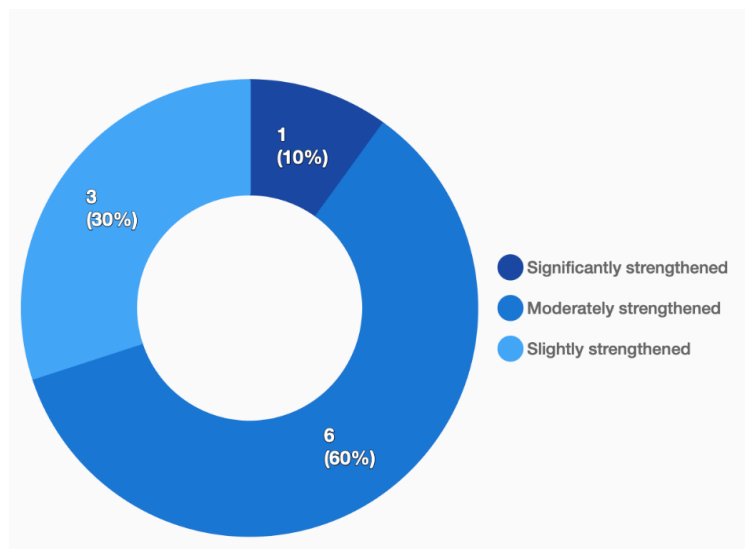


Figure 8: Partners’ perceptions of the extent to which the project strengthened the capacity of local CSOs to continue their anti-corruption work (Source: Evaluation Snapshot Survey, n=10)

Increases in research and knowledge capacity were reported by a majority of partners. The project significantly strengthened partners' research capabilities and anti-corruption knowledge through the application of the comprehensive NIS methodology. A national partner noted that ‘it’s a demanding exercise to produce the NIS, but it is a beneficial one once you’re done with it.’ The intensive research process built substantial analytical capabilities that partners could apply after the project’s end.

Further capacity was built by enhancing partners' ability to build, broaden and lead coalitions for advocacy impact. Partners in Albania, for the first time, worked with business chambers of commerce via the project. Kosovo reported that other organisations began *'asking for KDI to take the lead on advocacy effort'* on various laws, suggesting the project helped establish sustainable leadership capacity within the civil society ecosystem. Similarly, TI Macedonia described a platform of organisations for anti-corruption CSOs in the country often using NIS research as a foundation for coordinated responses, indicating institutionalised cooperation capacity that extends beyond project boundaries.

Partners also reported enhanced capabilities for engaging with government institutions and policy processes, indicating that the legitimacy and expertise of civil society partners within policy processes had been strengthened via the project. Kosovo's experience demonstrates successful institutional engagement capacity, where they learned to give institutions *'ownership in the process'* rather than simply presenting final products. They developed approaches involving *'many layers of feedback'*, representing advanced stakeholder engagement methodology that could be applied across various contexts (see Vignette 3 for further details). TI Macedonia noted that *'we are strengthening our influence and they are recognising us as a relevant partner to ask us to be part of these consultative groups'* – an indication that CEPI contributed to building institutional credibility and engagement skills that positioned organisations as serious policy interlocutors rather than external critics.

### Case Study Vignette 3: KDI Kosovo: Maximising Advocacy Impact Across Electoral Cycles

TI's national chapter in Kosovo (KDI) demonstrated how CSOs can strategically time advocacy efforts across electoral cycles. KDI's most successful period occurred during 2022-2023, when the Vetëvendosje government with Albin Kurti as prime minister was actively governing but not yet focused on re-election. CEPI implementation began in March 2022, six months after the new government took power—a timing that proved optimal for systematic reforms.

KDI built on existing relationships developed during the party's opposition years, creating familiarity with their expertise among incoming officials. Crucially, they extended relationships beyond political appointees to career civil servants, ensuring influence channels that could survive political transitions. Their strategy involved giving institutions *'ownership in the process'* rather than simply presenting demands, involving stakeholders in developing recommendations to create investment in outcomes.

KDI balanced confrontational tactics with cooperative relationships effectively. Their Law on Political Financing campaign exemplified this approach: a highly visible three-metre transparent wallet placed outside government buildings highlighted discrepancies between reported and actual party spending, while simultaneously providing policymakers with concrete data for legislative changes. Supported by international credibility through parliamentary study visits to Prague, the resulting law reflected most of KDI's recommendations, with parliamentarians publicly acknowledging their contribution. The "Get Immunised Against Corruption" campaign in late 2023 further illustrated creative public engagement. Using a giant vaccine prop and distributing cards resembling vaccination certificates with QR codes linking to corruption information, the campaign made governance issues accessible while maintaining visual impact. The Minister of Justice attended their public event and requested KDI's assistance with prosecutorial reform.

KDI's subsequent multi-year engagement on Kosovo Prosecutorial Council reform demonstrated sustained advocacy value. Initially opposing the government's draft for failing international standards, KDI found validation when the Venice Commission aligned with their critique. Rather than claiming victory, they deepened institutional engagement through workshops with the Ministry of Justice and

Parliamentary Committee, resulting in adoption of five of their eight recommendations and legislation entering force in early 2025.

As the 2025 electoral cycle progressed, KDI encountered predictable pre-election institutional paralysis. They used this transition strategically, preparing comprehensive recommendations and building relationships for post-election engagement, recognising that incoming governments often embrace reform opportunities when political capital is highest.

A key lesson learned from KDI's experience is that the most productive advocacy tends to occur during stable governmental periods between honeymoon and re-election phases. Involving stakeholders in recommendation development creates investment surviving political transitions. International validation enhances domestic credibility, while maintaining evidence-based analysis preserves institutional access during politically sensitive periods.

**This Vignette is based on internal interviews with the implementing partner and TI-S colleagues, as external interviewees did not reply to requests for interviews. Documentary evidence was used to triangulate internally, including:**

Assembly of Kosovo (2024) Law on the Kosovo Prosecutorial Council, Law No. 08/L-191.

KDI (2023) ["Political Financing in Kosovo: What after the legal amendments?"](#)

Venice Commission (2023) [Opinion on the Draft Law on the Kosovo Prosecutorial Council, European Commission for Democracy through Law, CDL-AD\(2023\)015.](#)

*EQ 5.4 Have project tools (e.g., National Integrity System assessments, case database) fostered public scrutiny and accountability?*

NIS Assessments were reported as being well-received and achieving public acclaim in many countries. TI Macedonia noted that one institution (the State Audit Office which received the highest scores) *'published the NIS on their web pages and [...] made a video in order to make a promotion of their success based on the NIS'*. In this and other countries, partners suggested that the project contributed to creating a positive competitive culture between governance institutions, which could lead to sustained impact. Several partners reported being increasingly recognised as credible policy interlocutors, a further positive impact of the project.

Several partners noted that, aside from the NIS, other project tools such as the Database and the NIS Tracking Mechanism arrived too late for sustained use during the project period, limiting opportunities to foster public scrutiny and accountability using these tools.

*EQ 5.5 Are there signs of replication or scaling of project approaches by other actors?*

The evaluation finds limited but promising evidence of replication and scaling of project approaches by other actors. The comprehensive nature of the NIS reports generated academic interest, with an interviewee from Albania noting the research provides *'very valuable data for new researchers, and especially to understand how the political context has shifted'* and represents *'an important contribution to the literature academic literature, because it's really an in-depth academic work.'* This suggests potential for academic replication/use of the NIS and scaling of approaches.

Several partners noted interest from municipal and local level actors in replicating approaches. North Macedonia mentioned that colleagues expressed interest in conducting *'integrity assessment of municipalities'* using a similar methodology to the NIS, whilst they also described engaging with women organizations throughout the country through meetings where *'we have agreed on our activities to make something together and to introduce each other more about what we are doing.'* An interviewee from Kosovo also noted that their work had *'inspired further research'* with municipal-level applications, suggesting downward scaling from national to local levels.

While not initiated by outside actors, there were spin-offs by partners that are worthy of mention here. TI Macedonia demonstrated innovative capacity development by creating new analytical approaches, including their cost-benefit analysis connecting foreign funding to institutional performance and a ‘corruption barometer’ which has been of use to embassies in the country, demonstrates sustainable advocacy capacity enhancement.

*EQ 5.6 Were there any unintended impacts—positive or negative—resulting from the project?*

The project generated only a few unintended impacts. On the positive side, the project did unexpectedly strengthen TI's regional advocacy capacity, bringing the national partners from the Western Balkans into forums like OGP and the Berlin Process, together as a region with one voice, where they had previously not been present. In several countries, the project's broad scope functioned like core funding, allowing partners to adapt activities to emerging priorities, such as urgent judicial reforms in Albania. The NIS findings also gained unexpected traction internationally, with Western Balkans evidence contributing significantly to global UNCAC advocacy work on political finance transparency. On the negative side, the demanding NIS process stretched organisational capacity beyond expectations, with some partners struggling in this regard. In Montenegro, the extensive review process created tensions that escalated beyond normal working disagreements. EU communications requirements sometimes constrained advocacy flexibility, forcing partners to choose between timely communication and compliance with approval processes. The late delivery of key outputs like the corruption cases database meant partners couldn't use them for their intended advocacy purposes, leading some partners to suggest these activities were a wasted investment.

**2.6 Sustainability: To what extent are the benefits of the project likely to continue after the project has ended?**

The project benefits demonstrate mixed sustainability prospects, with some elements showing higher likelihood of sustainability, while others face significant challenges. National partners were relatively though not overly positive, with 8 out of 10 respondents stating they felt the project’s results are ‘quite sustainable’, 1 stating they are ‘very sustainable’ and 1 saying ‘not at all sustainable’.

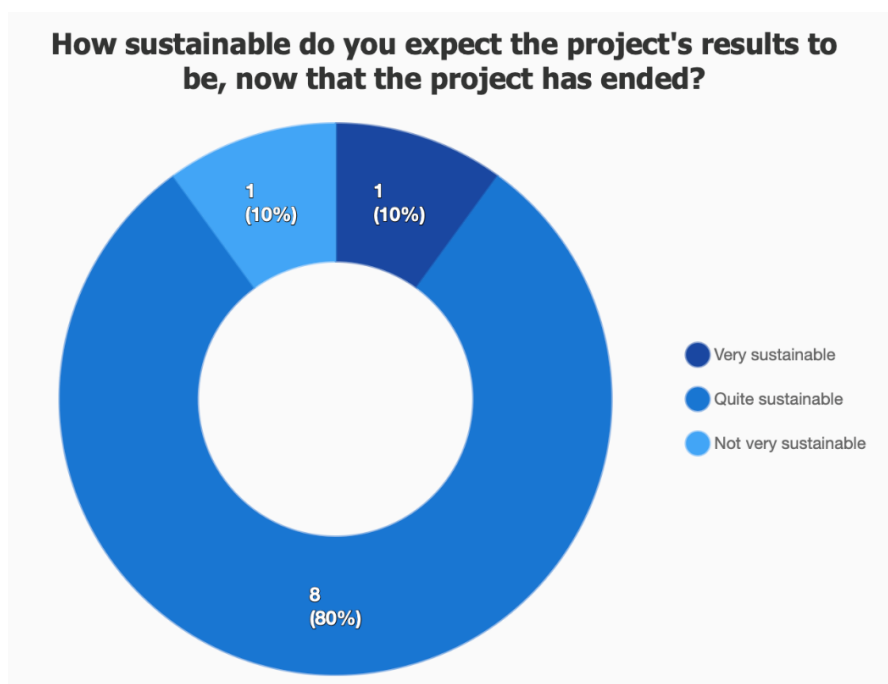


Figure 9: Partners’ perceptions of CEPI outcome’s likely sustainability (Source: Evaluation Snapshot Survey, n=10)

The National Integrity System (NIS) reports emerge as the most sustainable outputs, designed by their very nature to have longevity. As one partner noted, *'by its design, NIS is meant to last, and it's not meant to be carried out yearly or every two years, because the idea is to capture change, and if you want to capture change, you have to allow for time for change to happen.'* The NIS findings and recommendations will continue to guide organisations' work for several years, providing a framework for assessing future developments and informing advocacy strategies. Partners consistently emphasised that the comprehensive nature of the NIS gives it enduring value, with one noting that *'we will use it to sort of have a framework to assess future developments if they are in line with the NIS findings, or if they differ'*.

However, other project outputs are likely to be less sustainable. The corruption cases, in order to be continually updated, would require dedicated staff time that will not be available without project funding. Similarly, the capacity building activities and civil society networks developed through the project risk losing momentum without continued follow-up, dedicated resources and coordination.

#### *EQ 6.1 What mechanisms did the project put in place to ensure continued use of key tools?*

Interview data suggests that the project put in place few formal sustainability mechanisms, with most continuity depending on organisational commitment rather than systematic planning. The most concrete mechanism was the development of the NIS tracking tool, an online platform that allows for easier updating of information compared to static reports. For the corruption cases database, TI-S had sustainability in mind when it established it on the TI-S Global website rather than a separate project micro-site, ensuring it would not disappear when project funding ended. Each case in the database includes a clear date stamp indicating when it was last updated, managing expectations about how up-to-date it is. However, the crowdsourcing functionality remains active meaning cases could technically still be submitted, even though there is limited staffing to bring such cases through the rigorous fact-checking required before publication.

The fact that the project was implemented by members of the TI global network, and that there is an organisational culture of continuity beyond project cycles, provides an informal but important sustainability mechanism, though it is likely to vary significantly across different national chapters and the two external partners are not part of the network and therefore will be unlikely to feel the impact of this informal mechanism.

#### *EQ 6.2 What risks threaten sustainability, and how were they addressed?*

Several significant risks threaten the sustainability of project outputs and outcomes, with funding constraints emerging as the most critical challenge. Partners consistently highlighted the broader crisis facing civil society organizations in the region, with one noting, *'it is very hard to speak about sustainability of the products of the project if we have problem with sustainability of CSO in general in the region.'* The withdrawal of major donors, particularly USAID, has created severe capacity constraints. One organisation reported having to 'let go 4 people in the team' due to funding shortfalls, representing a 40% budget reduction. This directly impacts their ability to maintain project outputs and continue related work.

The Database was singled out by national partners as being at highest risk of becoming obsolete. There has been minimal integration of the database into national partners' own websites and even less into their advocacy work. Technical sustainability risks also emerged around the database, where the complexity of maintaining quality and updating information proved challenging during the project, not boding well for sustainability or growth after the project's end.

Political context risks, particularly in Türkiye and Serbia, threatened the sustainability of civil society engagement components. The project addressed these through flexibility in implementation, allowing partners to adapt activities to local constraints while maintaining core objectives.

*EQ 6.3 How has the project created an enabling environment for anti-corruption reforms and civic engagement?*

The project's contribution to creating an enabling environment for anti-corruption reforms and civic engagement was modest and uneven across countries, with some notable successes but also significant limitations. The evaluation found the project reinforced existing civil society capacity and provided useful tools for advocacy, contributing meaningfully to anti-corruption discourse in several countries, though it did not fundamentally alter the enabling environment for reforms in most contexts.

The most concrete contribution was providing civil society organisations with credible research tools and advocacy capacity that enhanced their standing in policy discussions. However, this engagement built on existing relationships rather than transforming the enabling environment. In Kosovo, the project timing coincided with a new government that was more receptive to reform, allowing partners to influence legislation on political financing and prosecutorial council reforms. The project provided evidence and recommendations that fed into these processes, but the political opening was '*a happy accident*' rather than one created by the project.

The civic engagement component had mixed but meaningful effects on the anti-corruption enabling environment. In Bosnia, partners successfully used the project's flexibility to organise trainings that addressed immediate civil society needs, particularly around EU negotiation processes and shrinking civic space. These activities helped civil society organisations understand their role in anti-corruption reforms and provided them with practical tools for advocacy. In Kosovo, public awareness campaigns generated significant media attention and brought anti-corruption issues to the forefront of the public discourse. Partners noted that such campaigns were valuable for engaging broader audiences beyond the usual policy circles and did have an impact on the enabling environment.

The regional networking aspect created useful connections between partners, allowing them to share experiences and learn from each other's approaches. A political financing conference in Pristina brought together both civil society and institutional stakeholders from across the region, creating cross-border dialogue on common challenges. As one global stakeholder emphasised, CEPI enabled, for the first time, space for creating a strategic regional voice on these issues.

However, the project faced significant constraints in several contexts that limited its environment-shaping potential. In Türkiye, political restrictions prevented public dissemination of findings, while in Serbia, government objections led to the cancellation of citizen engagement activities entirely.

*EQ 6.4 What lessons on EU value-added can inform future regional project funding?*

The evaluation elicited several important lessons about EU value-added in regional anti-corruption programming. The EU's role as a neutral, credible funder enhanced the legitimacy of project outputs, especially in combination with the well-respected TI brand. However, EU funding also created constraints that limited effectiveness. The branding and approval requirements sometimes delayed time-sensitive advocacy activities (as discussed under EQ 3.1) and the necessity of these could be revisited at EU-level.

The direct award funding mechanism which the CEPI project benefitted from proved both beneficial and challenging. While it allowed for a comprehensive regional approach that wouldn't be possible through competitive processes, it also led to overly ambitious designs that stretched implementation capacity. The donor's influence on project design, particularly the late addition of citizen engagement components 'without additional funding' created implementation challenges that impacted overall effectiveness.

Future EU regional funding could benefit from more realistic scoping of activities relative to available resources and timeframes. The regional approach adds value when it enables genuine collaboration and comparison, but forced regional elements can detract from national-level effectiveness.

The EU's unique position in the enlargement process creates opportunities for leveraging project findings in official assessments and policy dialogue. However, this requires more systematic mechanisms for ensuring project outputs remain current and accessible to EU institutions, addressing the challenge noted by EU officials that reports quickly become 'too outdated' for policy use. National partners expressed a readiness to provide more real-time information but this would need to be coupled with reduced expectations about rigour and depth (the benefit of a more in-depth analysis such as the NIS assessment).

### 3 Conclusions

This final evaluation concludes, based on the findings presented in the previous chapter, that the CEPI project demonstrated both the immense potential and inherent challenges of coordinating evidence-based anti-corruption advocacy across the Western Balkans and Türkiye. At its core, CEPI succeeded in delivering what implementing partners most valued: rigorous, credible research that opened doors to policy dialogue and provided a foundation for sustained advocacy efforts. The NIS assessments emerged as the project's key achievement, universally praised by partners and exceeding policy influence targets indicating the research was translated into policy, rather than left on the shelf.

The project, however, showed the tensions between ambitious vision and practical constraints, between donor requests and strategic priorities. From its inception, CEPI grappled with an overly complex design that stretched available resources across multiple demanding deliverables. This design was the result of TI-S's wish to build on previous comprehensive regional programming and the donor's wish to add elements which ultimately would cause implementation challenges. The six-month delay in hiring a research coordinator at the project's start had knock-on effects throughout implementation. The production of the NIS assessments was time-consuming and differing expectations around research standards and the review process caused frustrations and delays, which soured the process, although all partners managed to complete the deliverable successfully. Ultimately the national partners were satisfied with the final comprehensive NIS assessments, which they believe will inform their advocacy efforts for years to come.

Despite these challenges, CEPI had several key achievements, including the establishment of genuine regional priorities through bottom-up consultation processes. TI's partner organisations across the Western Balkans and Türkiye identified common focus areas—political financing and judicial accountability—and began coordinating their advocacy efforts as a unified regional voice. This regional coordination proved particularly valuable in international forums, where evidence from the Western Balkans contributed significantly to global anti-corruption initiatives, including successful advocacy for UNCAC resolutions on political finance transparency.

The project's effectiveness varied dramatically across participating countries, revealing how political context, organisational capacity, and strategic timing fundamentally shaped outcomes. Partners operating in permissive political environments with stable governments, such as Kosovo during its post-election reform period, achieved remarkable policy successes, including concrete legislative changes reflecting project recommendations. Conversely, organisations facing restrictive civic space or political instability, particularly in Türkiye and - to a lesser extent Bosnia - faced greater challenges in translating quality research into policy engagement.

CEPI's capacity building achievements were notable and encompass enhanced research capabilities, strengthened coalition-building skills, and improved institutional engagement approaches that are likely to benefit partners' work for years to come. The project functioned as essential infrastructure for sustained advocacy, providing organisations with the stability and resources needed to maintain consistent engagement with policy processes. Partners consistently noted that the comprehensive nature of the NIS methodology served as an umbrella framework enabling them to address multiple advocacy priorities within a coherent analytical structure.

The corruption cases database, however, illustrates the risks of disconnected project components. The database suffered from unclear positioning within the project's intervention logic, significant delays due to competing priorities, and limited advocacy utility. Its late delivery meant partners could not effectively leverage it during the project period, while ongoing sustainability challenges raise questions about its long-term value. This experience underscores the importance of ensuring all

project elements contribute meaningfully to overarching objectives rather than simply fulfilling donor expectations.

Regarding sustainability, the project's legacy appears most secure in its core research outputs and enhanced organisational capacities. The NIS reports, by design, provide enduring value that will guide advocacy work for several years. Regional networks and collaborative relationships established through CEPI show some promise for continuation, particularly around the shared priority areas of political financing and judicial accountability but will need follow-up and encouragement from TI-S, in the absence of follow-on funding. Indeed, sustainability faces significant threats from the broader funding crisis affecting civil society across the region, with major donors like USAID withdrawing support and forcing organisations to reduce staff and programming.

Ultimately, CEPI's value lies in strengthening the infrastructure and capacity of anti-corruption CSOs to engage effectively in evidence-based policy dialogue. The project succeeded in demonstrating that comprehensive regional programming can work when it builds on existing strengths, maintains flexibility to adapt to diverse contexts, and prioritises quality research as the foundation for all other activities. The lessons learned from both its successes and challenges provide valuable guidance for future regional anti-corruption programming in the Western Balkans and beyond.

## 4 Recommendations

### Recommendations for Transparency International Secretariat (TI-S)

**Strengthen Project Design and Capacity Assessment:** The CEPI experience demonstrates that overly ambitious designs ultimately undermine both implementation quality and partner satisfaction. TI-S should conduct implementation capacity assessments before finalising project designs, ensuring that proposed activities align with available coordination resources and partner capacities. Future projects in the Western Balkans should prioritise depth over breadth, focusing on fewer deliverables that can be implemented effectively.

**Enhance Regional Coordination Capacity:** Building on CEPI's success in establishing shared regional priorities, TI-S should develop more systematic mechanisms for ongoing collaboration that extend beyond individual project cycles. This includes creating regular platforms for regional knowledge exchange (beyond annual/regional meetings) and developing regional advocacy strategies that leverage comparative evidence across countries and align with TI-S global priorities.

**Improve Research Oversight and Support Systems:** TI-S should address the research coordination challenges that emerged during CEPI, recognising that stakeholders disagree about root causes and solutions. Before determining the optimal approach, TI-S should conduct a cost-benefit analysis to distinguish between minimum non-negotiable quality standards (essential for protecting reputational integrity) and resource-intensive standards that might be applied selectively. Future projects should consider enhanced central research coordination with additional resources for peak periods, scaled-back research coordination with greater national autonomy (understanding the risks this entails), or narrowed project scope—explicitly addressing the tension between comparative rigour required for donor credibility versus appropriate accommodation of local institutional contexts, based on realistic assessment of available resources relative to project ambitions. A new lighter-touch National Integrity Priorities tool could be a happy compromise.

**Strengthen Results-Based Management for Learning:** TI-S should ensure regional project's MEL frameworks prioritise adaptive learning over compliance reporting, ensuring common understandings are in place of 'what counts' under each indicator. TI-S may consider making the MEL process less extractive by emphasising the value of MEL to implementing partners and developing systematic approaches for sharing back aggregate insights and lessons learned to partners across the region and potentially more broadly across the TI-S movement. Additionally, MEL could be more closely linked to fundraising, for example TI-S could support national chapters to develop fundraising materials on the basis of their MEL outputs (making the MEL data more usable as evidence of their impact).

## **Recommendations for the European Union**

**Right-Size Regional Programming Expectations:** The EU should adjust expectations for regional anti-corruption programming to reflect realistic implementation timeframes and resource requirements. CEPI's experience demonstrates that comprehensive evidence generation and advocacy coordination require substantial time and resources that cannot be compressed without undermining quality. Future project designs should undergo thorough feasibility assessments that consider both the complexity of proposed activities and the capacity constraints of implementing organisations. The donor should not value quantity of deliverables over quality and should learn from the over-ambitious scope of CEPI to adjust the expectations for future projects.

**Enhance Operational Flexibility for Civil Society Programming:** The EU should explore outcome-based funding approaches that prioritise results over predetermined activities, allowing organisations to adapt their work to emerging political opportunities while maintaining focus on agreed objectives. Partners emphasised that DFID had taken such an approach, which may offer some lessons learned.

**Clarify Information Needs in Consultation with CSOs:** The EU should seek to clarify its information needs and the formats that would be most useful for EU enlargement monitoring and rule of law assessments in consultation with national CSOs. CSOs are interested in addressing the challenge that research outputs can become outdated by the time they are needed for policy purposes and are interested to explore real-time information gathering that complements comprehensive assessments like the NIS.

**Support Long-term Sustainability Planning:** Given the funding crisis affecting civil society across the region, the EU should consider longer-term funding commitments that allow for genuine capacity building and relationship development beyond individual project cycles. This includes supporting regional civil society coordination mechanisms that can maintain momentum between formal projects and ensuring that sustainability planning is integral to project design.

**Improve EU Delegation Engagement:** While EU delegations provided formalistic support for CEPI activities, there is potential for more substantive engagement that could enhance project impact and sustainability. Delegations could play even stronger roles in facilitating dialogue between civil society research findings and government reform processes, leveraging their diplomatic relationships to create opportunities for evidence-based policy engagement.

## Recommendations for National Implementing Partners

**Enhance Regional Coalition Building and Knowledge Sharing:** Partners should expand on the successful regional knowledge exchange and collective action elements of CEPI, by creating ongoing mechanisms for peer-to-peer learning and collaborative advocacy. This could include developing formal and informal networks where national implementing partners can share experiences, coordinate responses to common challenges, and leverage each other's expertise for mutual benefit. The Albania-Kosovo political financing knowledge sharing model provides a useful template for bilateral learning that could be replicated across the region.

**Improve Integration of Research and Advocacy Functions:** National partners should learn from the successful examples of NIS implementation and in particular, should ensure that they strengthen multi-stakeholder validation processes that create institutional ownership of findings. In some countries, the NIS advisory group was well used and in others it was not used to full effect.

**Strengthen Organisational Sustainability Planning:** Given the challenging funding environment, national partners should continue to diversify their resource base and develop contingency planning for maintaining core anti-corruption capacity during funding transitions. This includes leveraging the enhanced credibility gained through projects like CEPI to develop new donor relationships and exploring innovative funding mechanisms that can provide more stable long-term support for evidence-based advocacy work.

**Maximise Value from Comprehensive Research Investments:** Partners should explore creative ways to leverage research investments like the NIS for multiple advocacy purposes and spin-off activities, following the example of innovative approaches developed during CEPI such as corruption barometers and cost-benefit analyses of reform progress. This could include developing systematic approaches for updating and refreshing research findings to maintain their policy relevance over time and creating user-friendly formats that can reach broader audiences beyond traditional policy circles.

**Develop Real-Time Monitoring and Rapid Response Capabilities:** National partners should seek to enhance their capacity to provide the real-time anti-corruption monitoring that EU institutions increasingly require for enlargement processes and rule of law assessments. While comprehensive research like the NIS provides essential depth and rigour, partners should complement this with agile monitoring systems that can track ongoing reforms, policy developments, and corruption incidents as they unfold. This includes developing streamlined reporting mechanisms that can quickly assess whether government commitments are being implemented, creating early warning systems for concerning developments, and establishing protocols for rapid evidence gathering when EU institutions need current information for monitoring reports or policy decisions. This capacity could significantly enhance their value to EU processes while creating additional opportunities for policy influence.