aleph strategies

Adaptive, Risk-Based Approaches to Anti-Corruption in Covid-19 Responses (ARBAC-19) Final Evaluation

Final Report

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the global coalition against corruption

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ACRONYMS

ADB	Asian Development Bank
APNAC	African Parliamentary Network against Corruption
ARBAC-19	Adaptive, Risk-based Approaches to Anti-Corruption in COVID-19 Responses
CSO	Civil Society Organisation
DRL	US State Department Bureau of Democracy, Human Rights and Labor
EBRB	European Bank for Reconstruction and Development
EU	European Union
FOI	Freedom of Information
ITGP	Transparency and Public Governance Index
MEL	Monitoring, Evaluation and Learning
MP	Member of Parliament
NGO	Non-government Organisation
OECD-DAC	Organisation for Economic Co-operation and Development - Development Assistance Committee
PITT	Performance Indicator Tracking Table
PRAZ	Procurement Regulatory Authority of Zambia
RRA	Rapid Risk Assessment
RRF	Recovery and Resilience Facility
SDG	Sustainable Development Goal
TI	Transparency International
TI-A	Transparency International Argentina
TI-H	Transparency International Honduras
TI-K	Transparency International Kyrgyzstan
TI-R	Transparency International Russia
TI-S	Transparency International Secretariat
ToC	Theory of Change
UNCAC	United Nations Convention Against Corruption
UNDP	United Nations Development Programme
UNODC	United Nations Office on Drugs and Crime
USG	US Government
ZACC	Zimbabwe Anti-Corruption Commission
ZIMCODD	Zimbabwe Coalition on Debt and Development
ZNPHI	Zambia National Public Health Institute

EXECUTIVE SUMMARY

The ARBAC-19 programme was designed under the exigencies and pressures of an unfolding and unprecedented pandemic. We fully acknowledge the unique circumstances in which the programme was conceived, and have therefore adopted a more nuanced lens when evaluating programme performance than we would on 'typical' projects carried out under non-emergency conditions. Nevertheless, as Transparency International seeks lessons to inform future potential emergency preparedness, planning and delivery, we do not shy from criticism where we feel it is warranted.

Key Findings

The evaluation was based on five OECD-DAC evaluation criteria: relevance, coherence, efficiency, effectiveness and sustainability. Overall, we find that:

- The programme was, and continues to be, highly ***relevant***, though the goals were ambitious given the availability of resource and the timeframe allocated for achieving results.
- The programme was generally ***coherent*** with Transparency International's wider strategic purpose, though we find emergency preparedness to be conspicuously absent from TI's 2030 Strategy.
- There were notable weaknesses in programme ***efficiency***, related to inadequate resource allocation and poor MEL systems. However, communication and coordination facilitated by TI-S was generally positive, and data was generally collected and delivered on time for quarterly reporting.
- There is some evidence to suggest that activities were somewhat ***effective*** in contributing the intended programme outcomes, though the absence of primary data prevents an accurate analysis of this evaluation pillar.
- ***Sustainability.*** Although the ARBAC-19 programme was designed in response to a specific emergency, we find some good examples of activities that have a wider relevance to TI's wider portfolio, and will be continued after the end of the funding period.

The ARBAC-19 programme is better understood as a portfolio of loosely connected projects rather than a programme. Working across multiple, highly diverse, political contexts, each of the 11 participating National Chapters pursued largely independent activities, loosely connected by a set of common objectives.

Significant efforts were undertaken to create a more coherent programme over the course of the implementation period, but the fundamental architecture of the programme limited these efforts. Key improvements included the 'best practice blogs' and the improved quality of reports, which focused more on outcomes rather than outputs. However, while Transparency International is to be commended for the speed with which it conceived of and mobilised the ARBAC-19 programme, **the foundations laid at the beginning of the programme were insufficient to support the scale and ambitions of the undertaking.** 'Legacy' issues, such as the weak MEL framework, hampered programme performance. In this sense, the programme was continually 'on the back foot', trying to build a coherent impact narrative and foster a collaborative dynamic between National Chapters.

Recommendations

We make four overarching recommendations, which are presented in full at the end of the report:

1. **Walk the Talk -** Transparency International sets high standards for its own MEL work. However, this evaluation has highlighted a gap between policy and practice. Sound MEL planning and application cannot be bypassed, least of all in an emergency response. Monitoring and evaluating programmes require investment – this should not be an afterthought.
    - **Action 1 –** Ensure that TI-S MEL staff are adequately budgeted on each programme.
    - **Action 2 –** Build theory of change into each programme.
    - **Action 3 –** Develop internal MEL frameworks for each programme, linked to TI's overall strategy.
    - **Action 4** – Strengthen verification and quality assurance processes.
    - **Action 5** – Negotiate more explicit freedom to pilot and refine programme tools and approaches during inception phases.

2. **Provide training on public spending –** As aligned with TI-S's 2030 strategy, particularly Strategic Objective 1, public spending corruption risks and advocacy on public integrity – especially pertaining to COVID-19 – will remain important topics for anti-corruption campaigners. The lessons learned from ARBAC-19 therefore have great relevance to the 101 National Chapters and partners that were not part of the programme
    - **Action 1** – Develop definitions for programme indicators.
    - **Action 2** – Elaborate a model theory of change for emergency public procurement anti-corruption interventions.

- Action 3 – Develop a manual for monitoring and countering corruption in emergency public procurement.

3. Create Chapter Profiles - In order to facilitate the selection of National Chapters for future programmes, TI should consider building a 'status map' of National Chapter profiles, highlighting operational experience and managerial capacity. We acknowledge that TI has already identified this as a priority deliverable in the Global Movement's performance objectives. The profile status map would facilitate rapid decision making, enabling programme managers to ensure that National Chapters' skillsets and track record are aligned with programme objectives. This would also facilitate a wider analysis of how National Chapters are aligned with TI's global strategic direction. It would also strengthen risk mitigation at the selection stage of programme design in enabling more accurate budgeting for level of effort, time lines and potential training needs.
    - Action 1 - Build a basic template for National Chapter self-reporting.
    - Action 2 - Request National Chapters to complete the profiles during the re-accreditation process.

4. Develop an emergency response strategy - The evaluation has highlighted a gap in TI's global strategy. Emergency preparedness and response requires a strategy and action plan.
    - Action 1 - Incorporate emergency preparedness and response in the next strategic cycle beginning in 2027.
    - Action 2 - Develop an action plan for emergency preparedness, building specific internal structures, frameworks and tools including ToCs and up-to-date risk assessments.

1. INTRODUCTION

1.1. About this Document

Transparency International commissioned **Aleph Strategies** to conduct a final evaluation of the Adaptive, Risk-Based Approaches to Anti-Corruption in Covid-19 Responses (ARBAC-19) programme. This evaluation report contains the key findings and recommendations that emerged from our analysis of qualitative and quantitative data sources. A full methodology can be found in the annexes at the end of this report.

1.2. Background

The ARBAC-19 programme works in 11 countries with an original mandate for 24 months, and a budget of USD 987,654, funded by the US State Department Bureau of Democracy, Human Rights and Labor (DRL). The programme was developed in recognition of the potential for corruption risks in public procurement during the COVID-19 pandemic. During this time, an unprecedented volume of money was made available to government ministries to combat the pandemic. Speed was of the essence, as governments battled to keep ahead of infection rates. With limited transparency and accountability safeguarding measures in place in many countries, both the scale and speed of COVID-19 responses created significant opportunities for corruption. It is within this context that TI delivered the ARBAC-19 programme, which aimed to reduce corruption risks in emergency response funding through anti-corruption measures in target countries. There were two overarching objectives of the programme:

- **Objective 1:** Oversight bodies and civil society-led advocacy in up to 11 countries effectively reinforce anti-corruption frameworks responding to Covid-19 related corruption risks.
- **Objective 2:** Identified abuses and attempted misuse of COVID-19 related funds, including public procurement processes are sanctioned, in a minimum of 5 countries.

The programme has recently been extended from September 2022 to May 2023[1] in order to allow the National Chapters to develop their advocacy recommendations and to extract relevant trends from the National Chapters aligned with TI's global strategy.

[1] The Chapter-level implementation of the activities will be until 31 March 2023, the last 2 months of the project focusing on reporting, evaluation etc.

1.3. Objectives

As the programme draws to a close, this external evaluation will provide an account of programme performance, encompassing both the attainment of stated programme objectives and the manner in which the programme was delivered. This evaluation has four primary objectives:

i) Provide an independent systematic and objective assessment of the achievements and results, weaknesses and strengths of the project and the extent to which it has contributed to the desired goal;
ii) Assess whether the programme's underlying assumptions were correct and whether the results chain describes the most effective route toward expected results;
iii) Generate lessons learned and good practices from the respective goals of the project;
iv) Provide clear and forward-looking recommendations that can guide the TI Secretariat and partners in developing future projects and interventions.

1.4. Limitations

Limited time allocation for this evaluation. A total of 20 days is allocated for this exercise. This conferred a number of limitations on both the breadth and depth of this evaluation. The review team maintained a programme-level focus, rather than a deeper assessment of country-level activities. Within this timeframe, it was not possible to gather primary data from programme participants and beneficiaries, focussing instead on gathering insights from programme staff within TI. The only exception to this were the small number of interviews conducted with external parties in Zambia and Argentina.

Absence of outcome level data. The programme results framework does not contain explicit intermediary indicators situated between *activities* and *objectives*. Some of the activity indicators can be interpreted as outcomes (such as *number of partners who have actively contributed to policy and advocacy efforts),* yet it proved difficult to extrapolate a coherent impact narrative based on these limited examples. We therefore relied largely on qualitative feedback from interviewees to investigate attainment of results.

Limited data verification – within this timeframe, we were unable to test the veracity or accuracy of data contained in the results framework. The weight of our evaluation insights therefore lies more on the operational and managerial elements of the programme rather than the *effectiveness* of its activities, which were largely based on self-assessment and project monitoring reports.

2. KEY FINDINGS

In this section of the report, we provide an assessment of programme performance using the OECD-DAC evaluation pillars of *relevance, coherence, effectiveness, efficiency* and *sustainability.*

2.1. Relevance

2.1.1. Validity of Objectives

The ARBAC-19 programme was highly topical at the time of inception in 2020. At this time, the risk of corruption during the pandemic was already well documented, as highlighted in a contemporary report published by the OECD[2], which highlighted a range of corrupt practices including questionable direct sourcing of supplier contracts and price gouging of medical supplies and equipment. In April, the OECD published a statement highlighting that 'the high risk of corruption posed a major challenge to tackling [the] global health crisis'[3]. Later that year, the United Nations Development Programme (UNDP) published a Guidance Note on Transparency, Accountability and Anti-Corruption Service Offer for COVID-19 response and Recovery, aimed at supporting countries to strengthen transparency and oversight of public procurement processes.[4]

Similarly, the United Nations Office on Drugs and Crime (UNODC) launched the COVID-19 Anti-Corruption Response and Recovery Project in November 2020, in recognition of growing fear of corruption.[5] The same year, the Open Government Partnership[6], Open Contracting Partnership and International Budget Partnership collaborated on the Open Response + Open Recovery Digital Forum, which was a series of events to facilitate discussions about anti-corruption and the pandemic. These references are a snapshot of the global public discussions taking place in 2020 about heightened corruption risks, and illustrate that the ARBAC-19 programme was well situated within and relevant to the context at the time.

The objectives of the programme remained relevant in the following years of programme implementation. At the 9th session of the States Parties to the United Nations Convention against

[2] OECD (2020a), Public integrity for an effective COVID-19 response and recovery, OECD Publishing, Paris
[3] OECD (2020c): Statement by the OECD Working Group on Bribery
[4] UNDP (2020): Transparency, Accountability and Anti-Corruption Service Offer for COVID-19 Response and Recovery
[5] UNODC (2020): UNODC Launches COVID-19 Anti-Corruption Response & Recovery Project.
[6] www.opengovpartnership.org/events/open-response-open-recovery-digital-forum/

Corruption in 2021[7], the Conference adopted resolution 9/1, which expressed deep concern about the impact of the pandemic on good governance and the rule of law. Transparency International UK's Track and Trace report from 2021 provided specific evidence of increased corruption, highlighting a high volume of questionable procurement decisions in the UK alone.[8] Most recently, the EU's recent report in 2023 on efforts to tackle corruption states that there is 'some evidence to suggest that the COVID-19 pandemic heightened the risk of corruption.'[9]

Relevance was enhanced by the use of Rapid Risk Assessments at the beginning of the project. All National Chapters were required to prepare a Rapid Risk Assessment (RRA) as part of their application for ARBAC-19 funding. It is encouraging to see the use of a standardised template for the RRAs, ensuring a consistent range of contextual factors were considered by each Chapter in preparation of delivering their activities. The template required National Chapters to reflect on a range of key issues, including: resources allocated to the COVID-19 response; stakeholder mapping; needs assessment and proposed activities. The requirement to conduct RRAs ensured that National Chapter actions were highly tailored to the local context. We note in practice that given the fast-paced nature of the pandemic, once sub-grants had been awarded to the 11 successful National Chapters, some were required to change their activities to respond to the fast-evolving and highly fluid operational contexts. In Lithuania, for example, TI was forced to modify its activities after the initial risk assessment as the government had not at the time developed legislation to permit the receipt of emergency recovery funds from the EU.

The ARBAC-19 programme objectives are considered to be clearly defined by all programme participants at both Secretariat and National Chapter levels. However, there is general consensus that the objectives were highly ambitious within the timeframe of the programme. The reinforcement of government frameworks (corresponding to Project Objective 1), for example, is generally considered to be a long-term programme goal under any circumstance, as policy, regulatory and legislative reforms are generally gradual and protracted processes. Furthermore, with a total budget of USD 987,654, some interviewees at the Secretariat questioned whether the objectives were achievable with these resources, particularly once they were disbursed to 11 National Chapters.

[7] UNCAC (2021): Conference of the States Parties to the United Nations Convention against Corruption

[8] Transparency International (2021): Track and Trace: Identifying Corruption Risks in UK Public Procurement for the COVID-19 Pandemic

[9] EU(2023): Stepping up the EU's efforts to tackle corruption

2.1.2. Structural Rationale

The structural rationale of the programme is weak. There is no explicit theory of change contained either in the original or the amended Project Narrative Document. There is a Logical Model, which provides a description of needs, inputs activities, outputs, outcomes and impacts beneath each of the Project Objectives. However, although the Logical Model attempts to create causal pathways linking activities to impacts, there are no explicit connections between specific outputs and outcomes. This makes it hard to test the intervention logic or the underlying contextual assumptions that are made in establishing a cause-and-effect relationship. Can it be said, for example, that producing reports and recommendations on anti-corruption (output) will lead to key civil society actors prioritising anti-corruption reforms (outcomes)? This does not mean that they will not lead to these outcomes, but without a clear rationale explaining how this will happen, it is hard to validate the relevance of programme activities, and harder still to extract clear indicators at the outcome and impact levels (as we elaborate further below).

With respect to programme assumptions (as part of the logic model), there is inadequate consideration of the conditions required that show or prove intervention logic. While a few assumptions have been explicitly stated, these do not account for how change is occurring at each stage in the logical model. The lack of explicitly stated assumptions at each stage (linking activities with outputs and outputs with outcomes) makes it hard to set a clear accountability ceiling - the level beyond which the programme cannot confidently claim responsibility for contributing to programme outcomes. It also makes it difficult to reflect on the suitability of the activities for achieving the goals, precluding opportunities for fine-tuning programme approaches and learning lessons for future work.

The programme results framework - the PITT - is weak. It is unclear how the PITT was originally developed as none of the programme stakeholders we interviewed at DRL or the TI Secretariat was involved in this process at the start of the programme. The PITT template - which is a standard format used to monitor many USG programmes, confers some obvious restrictions in terms of how indicators are presented. In particular it only allows activities and indicators to be reported, and does not appear to offer scope for separate lines for outcome reporting.

Given the widely acknowledged weaknesses of the PITT, there was certainly scope within this programme to develop a parallel, internal, MEL framework to track a more useful set of indicators, particularly at the outcome level, yet this was not done at the onset of the programme. This is something to be considered for future programmes where external templates confer similar

limitations. **The poor quality of the PITT is at stark odds with the strong MEL practices espoused and implemented by TI-S in general.**

There are a number of key challenges with the results framework:

- **To begin with, we find an inconsistent application of standardised MEL language and formats.** For example, it does not contain a distinct set of output or outcome-level indicators. Typically, we would expect to see exclusively output level indicators linked to activities, and a separate level of outcome-level indicators. Indicators under Project Objective 1 are generally output level, with the exception of indicator 1.5 (number of partners who have actively contributed to policy and advocacy efforts), which can be construed as an outcome. Indicators under Project Objective 2 are generally more outcome related, and in some cases do not appear to align with the activity they purport to measure. For example, Activity 2.1 supports procurement monitoring and analysis in at least five countries should have an output indicator (with target of 5) corresponding to the number of countries supported. Instead, it has an outcome level indicator recording the number of partner organisations monitoring emergency procurements, with a target of 7.

- **Another weakness of the results framework is the lack of clear definitions.** We acknowledge the strong role played by the TI-S in applying a conscientious and consistent formula for extrapolating data from the National Chapter reports, but the programme would have been better served by a stronger set of definitions for each activity indicator. These definitions should be written down and shared with each National Chapter. For example, under Project Objective 1, what constitutes a 'cross movement knowledge exchange' (activity 1.3) - is this a meeting, an email exchange, a conference, a phone call? And what constitutes a meaningful exchange? Similarly, under Project Objective 2, 'cases acted upon by public authorities' (activity 2.3) could be taken to mean a great many different actions.

- **Finally, the results framework did not include activities and indicators for actions that were added after the renewed scope of work.**

2.2. Coherence

2.2.1. Internal Alignment

The ARBAC-19 programme is thematically relevant to Strategic Objective 1 Protect the Public's Resources contained in the TI Strategy 2030. The Strategy acknowledges the 'new era of crisis response'[10], and the TI-S Implementation Road Map 2021-2022 contained a specific outcome for emergency response: *Increased adoption of standards and mechanisms for independent oversight of public spending and contracting procedures by civil society in emergency-responses and critical investments.* After the beginning of the ARBAC-19 programme, TI-S developed indicators for SO1, which it was compelled to report against in subsequent annual reports.

However, emergency response *preparedness* is absent from TI-S's strategic planning literature. Interviews with TI-S staff corroborate our observation, highlighting the need for clearer prioritisation of emergency preparedness at a strategic level. As interviews found, TI anticipates that there may be important funding opportunities from climate funds, for example, for which a demonstrated capacity to respond to emergency situations could be beneficial. The question of emergency preparedness therefore has important ramifications for future potential funding avenues and strategic positioning within the donor landscape.

While the TI-S Implementation Plan 2021-2022 and the Road Map 2021-2022 contain *thematic* priorities for emergency response, there are no specific actions for TI to ensure *preparedness* to respond to emergencies in the future. The *TI Strategy 2030 commitments "Making it happen"* list of priorities makes no reference to ensuring emergency preparedness. We acknowledge that strategies in general cannot accommodate every operational variable, but experience from the ARBAC-19 programme demonstrates that emergency response programmes, while addressing thematically familiar themes to TI (such as public procurement), require a level of preparedness that TI itself acknowledges is currently lacking. These areas are explored in detail elsewhere in the report, and include: readiness to respond to emergency funding opportunities; emergency-orientated screening tools for National Chapter selection; planning protocols (including MEL) for designing and budgeting a response.

[10] Transparency International (2021): Holding Power to Account: A Global Strategy Against Corruption 2021-2030, p.11

2.2.2. External Alignment

The ARBAC-19 programme is well-orientated with existing global frameworks in the anti-corruption policy and advocacy space. The programme is broadly aligned with the global frameworks and networks including UNCAC, Open Government Partnership, Open Spending EU Coalition, and European Anti-Fraud Office. Some National Chapter activities (Hungary and Lithuania) are direct collaborations with these networks. In Lithuania, for example, TI Lithuania collaborated with the Open Spending EU Coalition to finalise a methodology for monitoring the publication levels of the EU's Recovery and Resilience Facility (RRF) funds spending transparency and led a review for public spending in Lithuania. Additionally, we recognise that the ARBAC-19 programme thematically aligns with the UN SDG 16 - peaceful and inclusive societies, providing access to justice for all and building effective, accountable and inclusive institutions at all levels, including state-level. However, in terms of the broader TI strategy for ARBAC-19 and its objectives, there is no explicit, intentional integration of indicators or reporting against these wider global frameworks. As TI-S acknowledges, no effort was made to monitor results against specific objectives or targets within these frameworks.

At national level, there is limited data available to comment on existing civic initiatives similar to ARBAC-19 in most contexts. Anecdotal evidence from National Chapter interviews suggests that alignment with wider initiatives was generally sought where possible (i.e. in those instances where wider CSO initiatives existed). In Zimbabwe, ARBAC-19 was aligned with the initiatives of the Zimbabwe Coalition on Debt and Development (ZIMCODD) - a consonance based on a call for transparency and accountability in public management. In Brazil, TI worked alongside other organisations focussed on emergency contracting, consulting extensively at the beginning of the project to develop the methodology for their programme activities. In Hungary, TI participated in national-level anti-corruption working groups formed shortly after the pandemic. In Lithuania, although there did not appear to be other CSOs working in this space at the time, TI is a member of the Open Spending EU Coalition, working with organisations from 11 different member countries to increase beneficial ownership transparency and monitor the use of EU funds.

2.3. Effectiveness

Here, we depart from the PITT reporting framework and present key findings for each of the outcomes contained in the ARBAC-19 MEL framework (referenced as 'Annex III MEL Framework' in programme literature). As noted throughout this report, the deficiencies of the PITT framework preclude a

meaningful analysis of results, and though the Annex III MEL Framework itself is imperfect, the outcome indicators lend themselves to a more informative narrative structure.

In the absence of primary data, we are cautious about describing the programme in terms of *success* or *failure*. There may be many examples we have not included in our selection below; however, our intent is not to provide a comprehensive mapping of all achievements against each outcome, as this is the purpose of programme monitoring. Instead, we have sought examples from our interviews and from programme reporting that demonstrate a plausible contribution towards each outcome.

2.3.1. Objective 1 Outcomes

Key civil society actors prioritize anti-corruption reforms and identify cross-border mechanisms to drive change.

There is much evidence to show that civil society actors and NGOs in target countries began to prioritise anti-corruption reforms - the PITT framework indicates that a total of 26 partner organisations were mobilised to monitor emergency procurements. However, we find little evidence that these organisations identified cross-border mechanisms to drive change.

In Brazil, the use of the ITGP by NGOs illustrates prioritisation of anti-corruption reforms. In Zimbabwe, the National Chapter proactively engaged with CSOs to build capacity. At the National Association of Nongovernmental Organisation Directors' Summer Retreat, TI delivered a joint capacity building workshop with CSOs to detect corruption risks in procurement cycles. This allegedly created opportunities for partnerships between CSOs and parliamentarians. A policy brief from the event was also shared with the African Parliamentary Network Against Corruption, a collection of local organisations working in similar anti-corruption fields.

In Kyrgyzstan, we find a great example of civil society prioritising anti-corruption reforms as a result of TI's work. During the programme, TI discovered that CSOs had limited capacity to monitor public procurement, so it trained 12 organisations and built a national network. Such was the success of this work, according to TI-K, that the European Commission has provided additional funding to meet the demand from NGOs for further training.

In Lithuania, TI itself was able to foster cross-border collaboration through its participation in the Open Spending EU Coalition (comprising 10 other members) to monitor the publication levels of Recovery and Resilience Facility (RRF) funds spending transparency.

Exchange of promising practices among TI local chapters shape the advocacy tactics collectively and individually employed

Lesson learning and ideas exchange was actively encouraged by TI-S over the course of the programme. As noted in the 'Sustainability' section of the report, creative approaches were employed to stimulate discussion between National Chapters - such as the best practices blogs. Given the radically diverse operational contexts in which the Chapters operate, the blogs provided an opportunity to share ideas thematically. The quarterly meetings hosted by TI-S provided a further opportunity to share ideas.

However, we find few examples of specific lessons being adopted from one country to the next within the ARBAC-19 country portfolio. Though the quarterly meetings were generally appreciated by the National Chapters, there was a sense that a) the time was too short to engage in meaningful discussions (with short presentation times allocated per Chapter), and b) the simple breadth and diversity of actions made it hard to hone in on detailed discussions about specific issues. The few examples of specific lessons that had been shared between National Chapters that we *did* encounter, are highlighted later, in the 'Sustainability' section of the report.

Key actors at relevant levels (national, regional, international) endorse civil society led advocacy that prioritizes anti-corruption reforms, priority risks and vulnerabilities in the response to Covid-19

Building on the momentum of CSO mobilisation described above, programme reporting indicates that government authorities at national and regional levels did take actions that prioritised anti-corruption reforms. In Brazil, the ITGP proved to be a highly effective tool, empowering local NGOs with a practical accountability toolkit, which was endorsed by the government at national and municipality levels. In a follow up survey, results show that 73% of the participating municipalities reported that they have improved their practices after the Transparency and Public Governance Index (ITGP) assessment by following the TI Brazil recommendations guide, and 16.5% are carrying out actions with working groups to improve transparency and governance in their municipalities.

In Argentina, following recommendations made by TI, civil society actors were invited to the 5th Open Government National Action Plan co-creation workshop, by the National Directorate of Quality in Health Services and Sanitary Regulation in the Ministry of Health.

TI Zimbabwe highlighted that strong relationships with MPs affiliated with the African Parliamentary Network against Corruption (APNAC) and their presence in TI-Zimbabwe's capacity building workshops and other interface meetings has encouraged change in the direction of enforcing transparency and accountability in public procurement of COVID-19 supplies.

In Sierra Leone, TI organised four regional Public Procurement Policy dialogue sessions, involving a total of 30 CSOs and government agencies. A similar event was held in Freetown. One of the outcomes of these sessions was the inclusion of COVID-19 related health items on the Quarterly Price Norms. Finally, TI formed the Civil Society COVID-19 Resource Integrity and Anti-Corruption Working Group.

TI-Kyrgyzstan thoroughly reviewed and analysed the state web portal for public procurement and rallied support from the public procurement department and international organisations that finance government agencies to improve the portal. This has been an important contribution in support of the country's identification of misuse and/or abuse of COVID-19 related funds/goods, as well as reinforcing the country's anti-corruption frameworks (legislative and open data) in responding to COVID-19 related corruption risks.

2.3.2. Objective 2 Outcomes

Amplification by other news outlets and news aggregators of Covid-19 abuse/misuse investigative stories generated by journalists and civil society organisations supported through the project.

National Chapters collaborated with investigative journalists on at least 12 occasions, according to the PITT framework, exceeding the original target of 5. Whether and to what extent this work was amplified by the media in the country is difficult to assess within the constraints of this evaluation. There is little reporting of media amplification at aggregated portfolio level within the programme reporting literature, though we acknowledge this seems to have taken place at country level (based on media coverage lists submitted to TI-S as part of quarterly reporting).

In Honduras, TI successfully identified incidents of abuse of COVID-19 related funds. The journalists that ASJ collaborated with actively inquired about COVID-19 related spending, facilitating provision of open information on media outlets and websites. The public presentation of the data obtained from the information collected by the ASJ monitoring team on the vaccination against COVID-19 in six health regions paved a way for influencing decision makers and increasing access to vaccinations.

In Brazil, TI launched the results of the Transparency and Public Governance Index (ITGP), which gained significant media traction, evidenced by a selection of eight hyperlinked media sources contained in the YR2Q4 report.

In Hungary, TI's work on public information lawsuits has received widespread media coverage and public interest. Notably, according to TI's own quarterly reports, success in filing Freedom of Information (FOI) Act cases in the Supreme Court against government procurement bodies, and collaboration with investigative journalists has increased media attention and awareness about the misuse of COVID-19 funds. The chapter also organised an exhibition at the Sziget Festival presenting bad practices related to tourism fundings that gained a lot of attention and positive feedback from groups of people who were unaware of TI or corruption issues.

In Zimbabwe, TI worked with six journalists, selected from a cohort of 35 journalists that TI had previously trained in investigative techniques. As a result of this, a number of articles were published online, some of which allegedly received international attention, according to TI's YR2Q4 report.

Public statements and actions undertaken by authorities (national, regional, international) in response to civil society advocacy and investigative reports

It is hard to conclusively determine that TI's actions significantly contributed to changes in government behaviours, yet **we find a number of examples through our interviews and through a reading of programme literature, that indicate some positive changes.**

According to the PITT, TI has encouraged public authorities to act on 10 cases of corruption. In Zambia, we have seen key actors within government taking up the mantel of pursuing reform within wider government institutions. ZNPHI has become increasingly active at following up with government health offices about COVID-19 fund disbursement, following guidance from the National Chapter. ZNPHI is also now working with these bodies to strengthen systems for tracking and monitoring provincial and district level fund disbursement. In Argentina, progress is slowly being made towards the publishing of vaccine purchase contracts after legal action initiated by the Chapter. In Kyrgyzstan, sustained advocacy efforts by TI have led to reforms to the government's public procurement portal, which will shortly be required to publish greater details on awarded contracts. Working with the funders of the Public Procurement Department (ADB and EBRD) provided additional leverage for reform.

2.3.3. Marginalised Groups

There is little evidence to show that gender and marginalised groups were factored into the design considerations of the programme. While the original 'Project Narrative' document encourages National Chapters to 'pay special attention' to vulnerable groups, including religious minorities, women, LGBTI persons, persons with disabilities, religious and ethnic minorities and indigenous communities, we cannot find any further mention of these groups in any further programme literature (including the PITT or Annex III Logical Model). Interviews with staff at TI-S concur that these were not primary considerations for the programme during the original design stages.

However, we acknowledge that some National Chapters made efforts to include women and marginalised groups in their activities. In Zimbabwe, for example, TI intends to produce a final policy brief entitled 'A Gendered Analysis of Transparency and Accountability in the usage of Public Resources for COVID-19 in Zimbabwe', keeping gender an important component of public accountability. In Brazil, TI's selection of nine grassroots organisations to assess municipalities integrated gender balance and generational diversity as important elements. Additionally, in Zambia, TI particularly emphasised feedback loops to local communities. Within this consideration, they encourage local leaders to include women, people from rural communities, and people with disabilities in community sensitisation meetings to incorporate their feedback in decisions and policies regarding anti-corruption, transparency and accountability. That said, there is little evidence to demonstrate how the project activities achieved the intended results in ways that contributed equality and inclusion.

While it is encouraging to see efforts at mainstreaming gender in the programme by some chapters, there is room for improvement. There are a number of ways in which a more inclusive lens could be applied to anti-corruption programming in the future, including, integrating gender in the situation analysis and results framework, developing gender-sensitive indicators, and placing gender as a consideration in programme staffing, management and monitoring. [11]

2.4. Efficiency

2.4.1. Resource Efficiency

Overall, the programme was delivered within budget. However, a number of interviewees at TI-S felt that the budget was not commensurate with the programme's ambitions. With a total budget of USD

[11] UNODC (2020): Mainstreaming Gender in Corruption projects/Programmes-Briefing note for UNODC staff

987,654 over the course of 24 months (excluding the contract extension period), this is indeed a comparatively small programme when divided between 11 countries - each of which received USD 47,500 in the first instance. A number of countries were allocated cost-extensions in the region of USD 10-15,000 to carry out activities, demonstrating the need for additional funds. A question to consider for the future is whether it is more effective to include a smaller number of programme countries, granting a greater budget allocation to each one.

One of the ARBAC-19 programme's key strengths was its perceived flexibility. According to TI-S, DRL contracts allow for up to 10% reallocation of funds between budget lines. Within the ARBAC-19 programme, this permitted up to c.USD 98,000 to be reallocated without recourse to a contract renegotiation or amendment. Moreover, as the Grant Agreement itself testifies, there is no breakdown of how sub-contracts with the National Chapters need to be allocated; there is simply one budget line per National Chapter. Indeed, National Chapters and TI-S staff generally agree that the flexible nature of the funding enabled them to respond to changing circumstances at a national level, ensuring that the activities were truly adapted to meet local needs. For example, Lithuania was highly appreciative of the level of flexibility they were permitted in adapting activities and responding to events over the course of the programme period. Many national governments were unsure how to react to the pandemic initially, making it hard to define a suite of programme activities. This could only be done once governments decided how to act. In Lithuania, TI could only define its activities once the government created legislation to accept recovery funds from the EU. This happened after they submitted the original Scope of Work. The context in Russia was particularly challenging: TI was labelled as a 'foreign agent' and media organisations and civil society actors were vulnerable to criminal prosecution. TI had to adapt its advocacy plans and shift its focus from control and supervisory authorities to expert communities in the medical and pharmaceutical space. However, the flexible nature of ARBAC-19 funding and strategic emphasis on decentralised implementation enabled TI-Russia to adapt without extra administrative measures from DRL or TI-S.

2.4.2. Human Resources

At Secretariat level, there were notable gaps in the resourcing of the ARBAC-19 programme. Most notably, the programme did not 'book' adequate time for the TI-S MEL team. The budget contained in the original Grant Agreement with DRL indicates that only 5% of a MEL team member's time was budgeted for this work. From our external perspective, this is inadequate for the scale and complexity of the programme's MEL needs. This was an 11-country programme, working in a fast-paced context,

reporting across a broad range of programme activities. Building a suitable MEL framework and system is a complex undertaking and requires concerted technical inputs. This is especially true in a context where the MEL framework (in this case the PITT) is prescribed by the donor. Greater involvement of the MEL team in this programme could potentially have alleviated some of the difficulties experienced with the data reporting, and helped to build a more coherent results narrative.

Further, we observe that insufficient funds were allocated for the evaluation of the project. As noted in the 'limitation' section of this project, the number of days available for this evaluation (20) necessitates a very 'high level' review, and precludes any form of in-depth results analysis, data validation or impact reporting. We typically advocate for 5% (at a very minimum) of the total programme value to be allocated for MEL activities. This would represent USD 49,382.70 for the ARBAC-19 programme. In reality, only USD 25,900 was allocated for this evaluation and the MEL staff. We are given to understand from our interviews with the TI-S staff that there is a MEL policy (yet to be launched), which advises programme to allocate 5-10% of the overall budget to MEL activities. We strongly endorse this policy, and encourage a more universal application across the global TI programme portfolio.

Similarly, Regional Advisors were not budgeted within the programme at all. Regional Advisors play a key role in facilitating dialogue and encouraging collaboration between National Chapters and are an important source of ideas, information and expertise. Given the emphasis placed on testing new areas of work and learning from the ARBAC-19 programme, the absence of Regional Advisors from the budget is conspicuous. As vectors for learning and exchange, they could have added great value to the programme, especially given the broad geographic spread of National Chapters. Regional Advisors may have been able to facilitate stronger regional collaboration between geographically close Chapters, and helped identify potential lessons or collaborations with those in other areas, through Regional Advisor-Regional Advisor exchange. The two regional advisors we interviewed for this evaluation reported very little involvement with the ARBAC-19 programme, representing potential missed opportunities for greater cooperation and exchange between regional Chapters.

We do not comment on the extent to which the programme was adequately staffed at a national level, as we are primarily concerned with the overall picture. However, as this may prove to be relevant for future lesson learning, we note that one Chapter struggled to mobilise an implementation team once the programme was underway given the speed of the programme, circumstantial events, and the general capacity drain facing the local labour market. For future rapid-deployment programmes, there

could be value in assessing human resource capacity at Chapter level during the sub-grant selection process.

Staff turnover at TI-S appears to be minimal. Though few of the TI-S staff who took part in this evaluation were present at the beginning of the ARBAC-19 programme, there was adequate institutional memory contained within existing team members to provide meaningful inputs for the exercise. The current programme manager has been in place since May 2022, helping, among other improvements, to strengthen the quarterly reporting, introducing a programme Yammer site, and creating the three 'best practice' blogs.

At DRL, by comparison, there was a comparatively high turnover of staff, with three contact points appointed over the short timeframe of the programme. According to TI-S they experienced limited engagement from DRL at the beginning of the programme, losing out on opportunities to revise and strengthen the PITT framework, for example. According to TI-S, it was only when the current focal point at DRL joined that there began a more meaningful engagement on the programme, most notably on the results reporting expectations, which became more exacting and rigorous, encouraging better critical internal reflection within TI-S of the programme's MEL practices and intervention logic.

2.4.3. Time Efficiency

Interviews with TI-S highlighted delays at the beginning of the programme due to protracted sign-off procedures with DRL for National Chapters' scopes of work. TI-S described a complex process of consultations with DRL and DRL-funded NGOs at the beginning of the programme to ensure relevance to the context, and to avoid duplication with other DRL-funded initiatives. While it is encouraging to see that DRL was so assiduous in assessing the scopes of work for each National Chapter, we encourage a more expedited process in future in order to avoid implementation delays.

2.4.4. Monitoring and Accountability

We have assessed the quality of the results framework under the 'relevance' section and found it to be weak. In application, too, we find significant shortcomings. Our independent assessment of the MEL framework highlights the absence of clear outcomes and associated indicators as a critical weakness. Without outcome indicators, there is a logical 'void' between activities and objectives, making it hard (both in this evaluation, and in quarterly reports) to report accurately and confidently on progress towards results.

We acknowledge that output level reporting has its merits - it is generally much easier to count the number of meetings than it is to quantify the impact of these meetings - but without such outcome level indicators, only a limited picture emerges of overall programme impact. This is especially important in a context where the overall objectives will likely require a long time to materialise. Shorter term outcome-level indicators would have enabled a stronger results narrative over the course of the programme and within this final evaluation.

As far as the review team can ascertain, TI-S did not create a parallel, internal, results framework to compensate for the deficiencies with the PITT. As noted in the 'human resource' area above, TI-S MEL staff were not booked adequately onto the ARBAC-19 programme, and were not consulted at any point during the design or implementation of the programme. The TI-S MEL team provides technical leadership and support for TI-S's global portfolio, and is accustomed to engaging with programmes on the design and use of MEL systems. That this did not happen appears to be a combination of the programme's rapid set up and implementation, though none of the interviewees at TI-S was present at the time of the ARBAC-19 programme inception to verify this assertion.

There was a disconnect between the activities and indicators contained in the PITT and those used by the National Chapters. As each Chapter used an independent national level Scope of Work, workplan and reporting template, activities and results were described and numbered differently. This created a difficult process of interpreting and extracting the relevant results for the specific PITT indicators contained within the Quarterly reports. By TI-S's own account, this was a challenging process as it required careful mapping and reconciling of activities and results contained in 11 independent reports every quarter. In order to provide a degree of coherence to the reporting standards, TI-S helpfully referenced the activity numbers contained in the National Chapter reports when compiling the Quarterly Reports, ensuring that reported results could be traced and cross-referenced with specific sections contained with the National Chapter reports.

In spite of the deficiencies of the PITT, up to date programme data was available at the time of the evaluation, which is laudable. Data was reported to the Secretariat through quarterly reports. The Secretariat then collated the results from the quarterly reports, selecting relevant results from each Chapter to populate the PITT. According to interviews with the Secretariat, data submissions from the National Chapters generally happened on time. The National Chapters themselves were mostly content with the reporting process, with few major criticisms or concerns emerging from the interviews. This is

not surprising, as the National Chapters were given significant latitude (rightly) to develop their own Scopes of Work during the inception phase of the programme, and therefore could design their own reporting frameworks. The reporting requirements were therefore generally fairly relaxed compared to other frameworks we have encountered with TI, including the Siemen's Integrity Initiative Integrity Pact MEL framework, which is significantly more complicated and demanding of National Chapters. A small number of National Chapters found the ARBAC-19 reporting process to be burdensome, citing changing reporting requirements and a lack of clear outcome targets around which to structure a results narrative. Others struggled to meet the reporting requirements while they were grappling with operational challenges and project inertia due to extenuating factors.

TI-S was able to perform some checks to ensure data integrity, though we find room to strengthen approaches in the future. We understand from the interviews that significant efforts were made at TI-S to follow up by e-mail and teleconference with National Chapters on a regular basis to question and test data reported through the quarterly reports, in order to ensure that there was not double counting, and that reported achievements could be substantiated by a credible story of change (that results could be clearly linked through cause-and-effect to specific actions that the Chapter had undertaken).

However, TI-S did not plan, budget or conduct any field missions to further validate the data reported by the National Chapters. We acknowledge that this would have been challenging to implement at a time when global travel restrictions prevented much international movement. We further acknowledge that TI-S and the National Chapters are governed by strong MEL ethical standards, as outlined in the TI Monitoring Guide which provides clear direction for assessing contribution and attribution, and - importantly - sample indicators and clear definitions for the types of change TI programmes typically seek to bring about. Having interviewed every National Chapter in the ARBAC-19 programme, we note the high level of professionalism, knowledge and expertise contained within these organisations. When challenged on results - 'did XXX really lead to YYY' - each Chapter could provide detailed, specific and compelling accounts of their work and how they contributed to the reported results. From experience evaluating other programmes, this is not always the case, and is therefore worthy of note in this assessment.

2.4.5. Communication

Communication between the Secretariat and the National Chapters was good. National Chapters were generally positive about the level of engagement and support they received from the Secretariat, noting in particular its responsiveness to questions and calls for guidance. Formal points of engagement and communication centred on the Quarterly Reports, which provided an opportunity for discussions about individual Chapter results through bi-lateral exchange, and provided the impetus for quarterly group calls with all National Chapters present (we consider the content of these discussions in greater detail within the 'Sustainability' section of the report).

Communication between National Chapters was comparatively limited. Bilateral dialogue occurred at regional levels in some instances although wider dialogue with Chapters in other regions seems to have been restricted to quarterly online meetings. A few examples of regular bilateral exchanges include sub-regional exchanges between Lithuania and Hungary in Europe, and Zambia and Zimbabwe in Southern Africa. The meetings were generally considered to be useful in providing an update on programme progress, but provided little scope for cross-pollination of ideas and lessons. A number of interviewees within TI noted that the great diversity of programme activities and the radically different operational contexts limited opportunities for meaningful collaboration between National Chapters. Indeed, this reinforces a greater involvement of Regional Advisors for inter-regional and intra-regional constructive exchanges on programme practices in order to avoid siloed implementation in the future. Encouragingly, TI-S has planned opportunities for cross-chapter collaboration with the expected involvement of Strategic Objective Lead on protecting public resources in the first quarter of 2023.

2.5. Sustainability

2.5.1. Learning

The ARBAC-19 programme was designed to be both a rapid response to a crisis and as a learning exercise. The ARBAC-19 programme itself is described by senior managers within TI-S as 'atypical'. It is seen as a portfolio of essentially separate, bottom-up initiatives delivered at national level, rather than a coherent, strategically-led regional or global programme implementing a common suite of activities. Recognising that the programme operated under unusual circumstances (uncertain, rapidly evolving context) and given the unusual structure of the programme itself, programme managers viewed ARBAC-19 as a good opportunity to learn and 'stress test' different ways of working and emergency readiness. In this regard, it was hoped that the programme would uncover weaknesses and highlight

strengths in TI's ability to respond to emergency situations. Against this backdrop, the proposed future planning workshop is a promising opportunity to reflect on lessons learned across TI.

It is encouraging to see that throughout the programme, TI-S facilitated some lesson-sharing opportunities. TI-S captured and disseminated learning based on local best practices and experiences in the form of blogpost series; 1) Access to information and open data (Honduras and Argentina); 2) local action/civic engagement with inputs from TI Brazil, Honduras and Zambia; and 3) Innovative communications/investigative journalism (to be published before end of April). TI Chapters also participated in multiple lesson-sharing events. These include; 1) International Anti-Corruption Conference capacity-building event involving representatives from Lithuania, Russia, and Zimbabwe to exchange local experiences of monitoring public procurement, advocacy efforts, use of innovative approaches for emergency preparedness and addressing challenges like access to information, 2) Inaugural Colloquium of the International Consortium for Social Development in Johannesburg, South Africa with representatives from TI-Zimbabwe and TI-Zambia, and 3) regional event organised by TI Chapters in Latin America, with a focus on lessons sharing on the use of public resources in health systems. Additionally, TI-S also brought Chapters together through the Yammer community – communication platform - to encourage direct engagement and project update sharing between Chapters. We also note that TI-S is currently compiling a log of lessons learned throughout the programme implementation phase, which will be published after this report is finalised. Finally, Aleph facilitated a workshop in Berlin with the Secretariat and ARBAC-19 implementing Chapters to identify lessons for future programme planning and delivery.

2.5.2. Continuity

Under the auspices of the ARBAC-19 programme, TI was able to pilot a number of activities, some of which will continue after the funding period comes to a close. Brazil presents a good example of project continuity. With the success of the ITGP Index and widespread uptake of the methodology by local CSOs across municipalities, more than 120 legal measures, transparency and public governance practices have been improved or implemented. TI-Brazil aims to continue investing in capacity-building of the CSOs through technical support, enabling them to monitor and improve transparency and governance in their municipalities. The local, grassroots NGOs have reportedly shown great interest in the sustained use of TI's methodologies, community scoring systems and capacity-building support to assess municipalities on the grounds of accountability and transparency.

In Kyrgyzstan, the success of training provided to NGOs in monitoring public procurement has contributed to follow up funding provided by the European Commission to continue the provision of similar training to other NGOs. The work of TI Lithuania will be continued through the Open Spending EU Coalition, which will scrutinise the EU's Recovery and Resilience Facility (RRF) in collaboration with 10 other members. Argentina will now continue working on public health procurement as a prioritised topic for continued monitoring and oversight. This was not a priority before the ARBAC-19 programme, but TI Argentina learned that this is a high corruption risk sector, and is therefore adjusting its strategic focus accordingly. TI Argentina also envisages the continuous use of COVID-19 Vaccine Observatory tool for updating information on vaccine contracts and continuing the follow-up on information requests and legal action proceedings even after the end of ARBAC-19 programme.

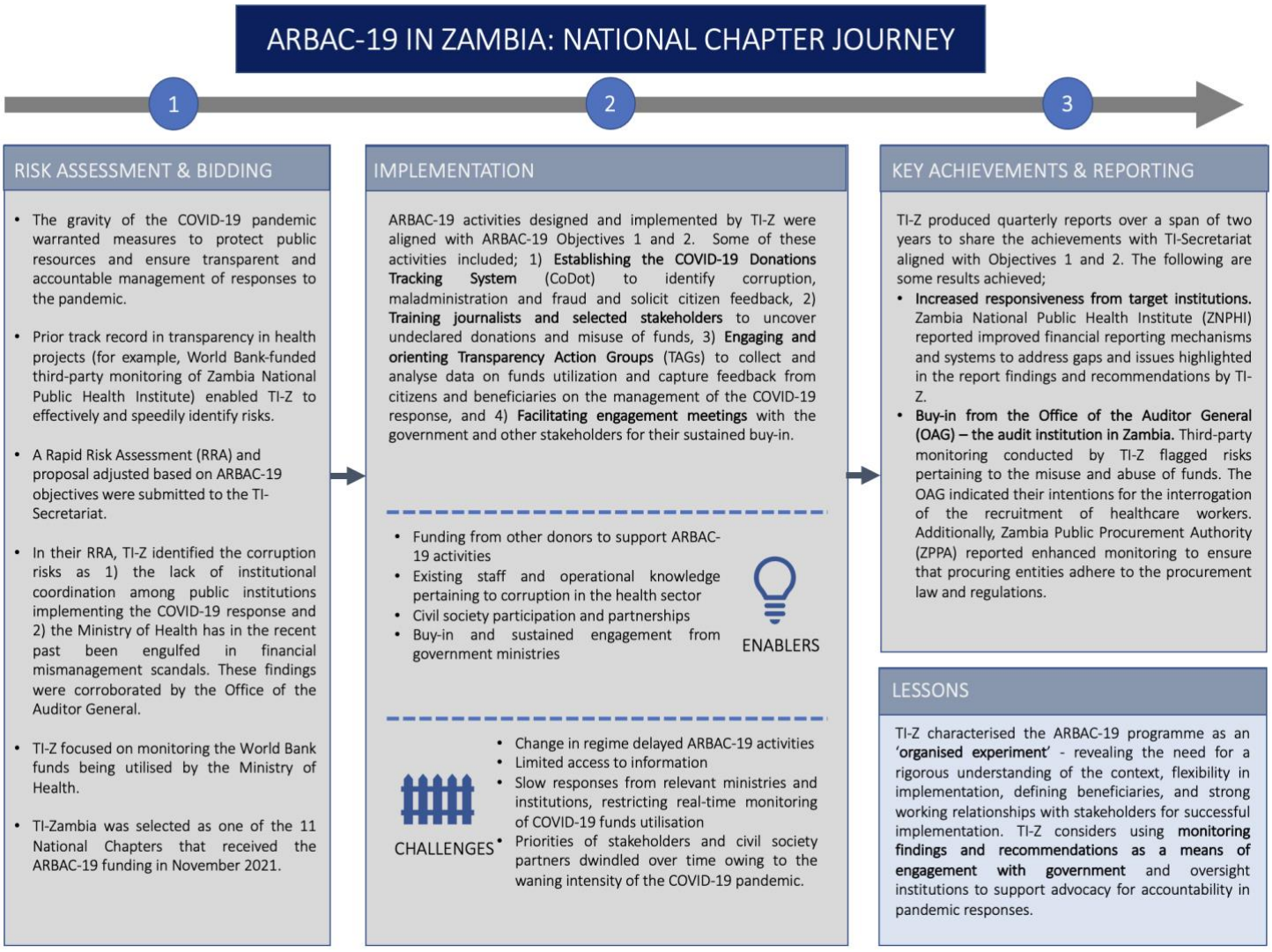
In Zimbabwe, one of the big outcomes was stakeholder relationships, particularly with the MPs. TI is eager to keep collaborating with relevant institutions including the Zimbabwe Anti-Corruption Commission (ZACC), Parliament of Zimbabwe, MPs affiliated to the African Parliamentary Network against Corruption (APNAC) as well as the Procurement Regulatory Authority of Zambia (PRAZ) to enhance integrity, transparency and accountability in usage of COVID-19 resources. In Sierra Leone, TI aims to continue advocating for access to public information on health procurement and pricing through quarterly monitoring and follow up engagements with government on the Price Norms manual.

The programme also yielded toolkits with possible application in other countries. There is a view within TI-S that one of the main outcomes of the ARBAC-19 programme is the range of new tools developed at national level that could have a wider application for future programmes and other country contexts. The tools developed and operationalised by Chapters - for example, the COVID-19 Vaccine Observatory in Argentina, the COVID-19 Resource Tracker in Zimbabwe and ITGP Index in Brazil - and other emergency standards may have the potential to be scaled into other national programmes.

3. CASE STUDIES

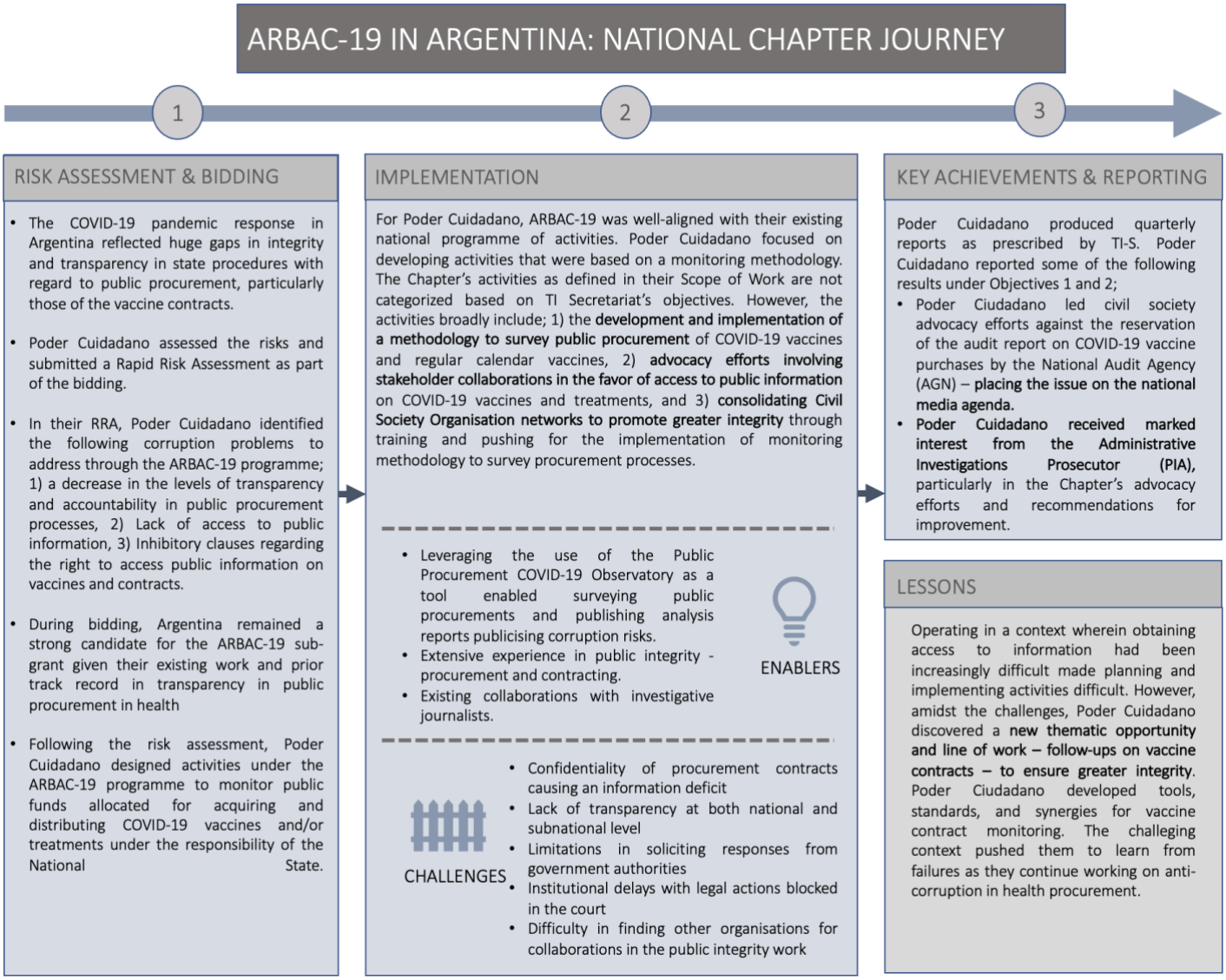
Here we provide a snapshot of two National Chapters, TI-Zambia and Poder Ciudadano, illustrating the programme lifecycle from bidding to implementation to final reporting. The intent is to succinctly demonstrate some of the enabling and inhibiting factors that contributed to project achievements, and to pull out lessons for wider consideration.

TI-Zambia



aleph strategies

Poder Ciudadano



4. RECOMMENDATIONS

The recommendations provided here correspond to the TI Movement's general working approaches. As the ARBAC-19 project itself will not be continued in its current form, we focus on actions that could strengthen TI's work in the area of emergency preparedness and response in the future based on some of the lessons learned from the ARBAC-19 programme. We have four overarching recommendations

1. Walk the Talk

Transparency International sets high standards for its own MEL work. However, this evaluation has highlighted a gap between policy and practice. Sound MEL planning and application cannot be bypassed, least of all in an emergency response, or in highly fluid operational contexts. Monitoring and evaluating programmes require investment – this should not be an afterthought.

- Action 1 – Ensure that TI-S MEL staff are adequately budgeted on each programme. In calculating an approximate allocation of time, consider the needs for project set-up (refining, designing results frame and ToC, developing project MEL plan), project delivery (collecting data, data verification etc.) and project reporting (quality assurance, technical inputs etc.). This will obviously vary from one project to the next depending on the scope and scale of the undertaking. TI's own guidelines suggest that at least 5-10% of the programme budget is allocated to MEL (including external evaluations and staffing). This is a strong basis from which to plan.
- Action 2 – Build theory of change into each programme. This must be explicit. Develop standardised language across TI to ensure that core terminology is well-understood and consistently applied (outputs, outcomes, impacts etc.). The practice of building clear causal pathways should be instilled, ensuring that assumptions linking cause and effect are well articulated.
- Action 3 –-Accelerate efforts in the development of internal MEL frameworks for each programme, linked to TI's overall strategy. This is especially important if TI is compelled to report against imperfect donor MEL templates (such as the PITT), because it will facilitate stronger impact reporting and analysis, and enable a more rigorous learning agenda.
- Action 4 – Strengthen verification and quality assurance processes. TI-S currently has very limited capacity to verify data presented by National Chapters. There are, so far as we can ascertain, no policies/frameworks to guide data verification processes, and

TI-S does not routinely travel to programme countries to verify/test programme data. Part of the solution here lies in budgeting – TI must allocate adequate resources to travel to a selection of target countries over the course of the programme, or to include greater involvement of TI's Regional Advisors, who may be better placed to conduct this work. Similarly, TI could create a standardised remote format, entailing interviews with external parties to verify the data.

- Action 5 - Negotiate more explicit freedom to pilot and refine programme tools and approaches during inception phases. From experience, this is far easier said than done. However, programme tools developed during bid-writing phases are rarely perfect. TI may wish to consider institutionalising formal reflection workshops at the end of the inception phases, providing an opportunity to reach consensus with the donor on tools and approaches. This would mitigate the risks of legacy issues introduced during proposal development, and ensure that systems are fit for purpose (theory of change; results framework, for example).

2. Provide training on public procurement

TI has learned a great deal from the ARBAC-19 programme. This is the first time the Movement has worked on public procurement in emergency situations. Though the COVID-19 pandemic appears to be behind us for the moment, taxpayers will be footing the bill for many years to come. Public procurement corruption risks – especially pertaining to COVID-19 - will remain an important topic for anti-corruption campaigners. The lessons learned from ARBAC-19 therefore have great relevance to the 101 National Chapters that were not part of the programme.

- Action 1 – Develop definitions for programme indicators. ARBAC-19 has provided an opportunity to explore the types of impact that can be achieved. On this basis, a more realistic set of sample indicators could be created, providing specific definitions for core terminology. This could include definitions for the specific systems that are vulnerable to corruption, and the particular actions that can be taken to address these weaknesses. More importantly, this would also include definitions for programme impacts. What would 'improved practices' look like in reality, for example?
- Action 2 – Elaborate a model theory of change for emergency public procurement anti-corruption interventions. With the benefit of two years' implementation experience, TI-S should develop a model theory of change outlining a basic cause and effect logic (causal pathway) linking typical types of activity with expected outcomes. Such a model would include assumptions, and, importantly, an appropriate timescale for change.

This recommendation is echoed below (recommendation 4) as it has wider relevance to TI's emergency preparedness.

- Action 3 – Develop a manual for monitoring and countering corruption in emergency public procurement. As insights from Brazil and Kyrgyzstan show, there is great interest from CSOs in how this can be done. The manual should include the definitions described above, as well as suggestions for solutions/activities, such as how/when to engage with government partners, how to follow up on findings, and how to involve CSOs, for example. This would also have relevance for internal capacity building of TI National Chapters, and could serve as a useful advocacy and awareness-raising tool within the global anti-corruption sector. The ARBAC-19 lessons learned log that is currently being compiled by TI-S could be a good starting point for this exercise.

3. Create Chapter Profiles

In order to facilitate the selection of National Chapters for future programmes, TI should consider building a database of National Chapter profiles, highlighting operational experience and managerial capacity. TI-S should engage with Regional Advisors in this process, as they reportedly already use a similar framework for Chapters that fall within their geographic remits. Feedback from Project Managers should also be integrated. We note that TI-S previously employed the Organisational Capacity Assessment Tool (OCAT), for a similar purpose, but this was generally considered to be both costly and time-consuming, and was eventually dropped. The Chapter Profiles we propose here should be a significantly streamlined variant, requiring minimal inputs from Chapters and TI-S contributors.

This should not be interpreted as a performance benchmarking exercise, which would be harmful and divisive. Rather, the profile database would facilitate rapid decision-making, enabling programme managers to ensure that National Chapters' skillsets, human capital capacity, and track record are aligned with programme objectives. This would also facilitate a wider analysis of how National Chapters are aligned with TI's global strategic direction. It would also strengthen risk mitigation at the selection stage of programme design in enabling more accurate budgeting for level of effort, timelines and potential training needs.

- Action 1: Build a basic template for self-reporting. This should include a range of basic attributes such as previous programme experience, financial management capacity, thematic experience, and national programme priorities.
- Action 2: Request National Chapters to complete the profiles during the re-accreditation process. Again, this would not be a 'pass/fail' exercise – simply a means

of establishing a universal picture of the TI Movement's operational capacity. Programme managers at TI-S should also be invited to comment on the profiles, adding experience they have acquired through previous Chapter collaborations.

4. Develop an emergency response strategy

The evaluation has highlighted a gap in TI's global strategy. Emergency preparedness and response requires a strategy and action plan.

- Action 1: Incorporate emergency preparedness and response in the next iteration of the TI global strategy. This simply entails a statement of intent, highlighting the need for emergency preparedness and response. Formulating this statement, as with all aspects of the strategy itself, will require careful consultation with the global Movement, ensuring that it corresponds to the wide range of potential emergencies that TI may be called upon to address, whether environmental, health, natural disaster or conflict.
- Action 2: Develop an action plan for emergency preparedness. This should be an operational document, providing clear direction on specific *internal* structures, systems and tools that need to be developed in order for TI to be equipped for emergency response. The lessons generated in this exercise should form the basis for the types of changes required internally, though we would encourage further critical reflection and internal consultation to arrive at a more detailed plan of action. Some of the tools that could be developed include:

- Template ToCs for individual programme streams – as noted previously, TI could develop 'pre-baked' ToC templates (for example in emergency public procurement) ready to be adapted quickly for bid development purposes.
- Maintain rolling risk assessments, updated on a (semi?) annual basis – National Chapters should be encouraged to maintain a corruption risk matrix in order to rapidly respond to proposal calls in emergencies. This would help to reduce project set-up times and instil greater preparedness to address crises as and when they emerge.

5. SELECT READING

A number of documentary sources were consulted in preparation of this inception report. These documents will be included in our on-going reading of programme literature, in addition to relevant documents identified over the course of the interviews.

TI documents

- D200364_US Department of State_Covid-19 Pandemic_27.09.20.pdf
- SLMAQM20GR2423-M001 (2).pdf
- Annex III_Logical Model - Clean - rev 16092020 - Clean
- MEL Plan_Revised
- PITT Framework Indicator Tracker Y3Q1
- Project Narrative - NCE updated_290622
- Scope of Work_NCE updated_290622
- Project Narrative - Clean - rev 16092020 - Clean
- Quarterly Report-Y2 Q1-OCT 1 to DEC 31 2021
- SLMAQM20GR2423-PPR-Y2Q2-Quarterly Progress Report
- SLMAQM20GR2423-Y2Q3-Quarterly Progress Report
- SLMAQM20GR2423-Y2Q4-Quarterly Progress Report
- SLMAQM20GR2423-Y3Q1-Quarterly Progress Report
- Strategy2030_Brochure-final_15022021
- TI-S Implementation Plan - Annex I_Road Map 2021-2022
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- Poder-Ciudadano-Form ARBAC-19-Vaccines
- TI-Zambia Rapid Risk Assessment - COVID-19 Response

- 19082022_Scope of Work TI Lebanon-Amended-Clean version
- Scope of Work TI Kyrgyzstan.doc
- Scope of Work_TI Lithuania_updated_20220401
- SOW_TI Russia.docx
- TI ARG SOW_for extension period
- TI Argentina-ARBAC-19 Schedule of activities-updated
- TI Brazil_SOW
- TI Honduras SOW_updated for NCE period
- TI Hungary SOW.docx
- TI ZAMBIA SOW V5_Realignment_24032022
- TI Zimbabwe Scope of Work v5mp
- TI-SL DRL Project - Scope of Work_V2

Other documents

- Fernandes, Meenakshi, and Lenka Jančová. "Stepping up the EU's Efforts to Tackle Corruption: Cost of Non-Europe Report." European Parliament, January 2023. https://www.europarl.europa.eu/RegData/etudes/STUD/2023/734687/EPRS_STU(2023)734687_EN.pdf.
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ANNEX: METHODOLOGY

Data Collection

Data was collected through a **literature review** of available ARBAC-19 material shared by the TI-S Secretariat. This included programme monitoring data, quarterly reports, planning documents, and national chapter scopes of work.

In parallel, Aleph conducted interviews with TI staff at the Secretariat and all ARBAC-19 participating National Chapters. Aleph also interviewed a representative from DRL. Two rapid case studies were conducted in Argentina and Zambia. This entailed a more detailed reading of project literature from each Chapter, a further interview with Chapter staff, and external interviews with a CSO and government stakeholder.

A list of interviewees is provided below.

Table 1: National Chapter Interviewees

Chapter	Name	Role
Argentina	Ana Pichon Riviere	Consultant; project coordinator
Brazil	Nicole Verillo	Apoio e Incidência Anticorrupção
Honduras	Dineyla Erazo	Coordinadora de Gestión de Fondos - Oficial de Género
Hungary	Judit Zeisler	Project Manager
Kyrgyzstan	Aigul Akmatjanova	Director
Lebanon	Pamela Chemali Raffoul	Head of Programs
Lithuania	Ieva Duncikaite and	Project Coordinator
	Ingrida Kalinauskiene	Interim CEO
Russia		Project manager at TI Russia **NOTE**: TI Russia employees's persona in the public communication may be problematic for these employees due to the TI's status of 'undesired organization' in Russia.
Sierra Leone	Edward Koroma	Sr. programs officer
Zambia	Tamika Halwiindi	Programs coordinator
Zimbabwe	Dakarayi Matanga	Sr. research Officer

Table 2: TI-Secretariat Interviewees

Name	Role
Manuel Pirino	Sub-team Lead, MENA; project oversight
Daniela Werner	MEL manager
Irem Roentgen	Project manager
Vicky Tongue	Head of Projects team
Ravi Prasad	Head of Policy and Advocacy
Daniela Patino Pineros	Strategic Objective 1 Programme lead
Robert Mwanyumba	Regional Advisor Southern Africa (Zimbabwe, Zambia)
Luciana Torchiaro	Americas

Table 3: Case Study Interviews

Name	Role
Joe Mapiki	CSO - Manager - Community Projects, Ubunthu Zambia
Wesley Kapaya Mwambazi	Governance Specialist - World Bank
Sofia Fares and Ramiro Lopez	Andhes (Abogados y Abogadas del Noroeste Argentino en derechos humanos y estudios sociales)

Validation Workshop

A validation workshop was held online on the 14th of April. Present from TI-S were: Irem Röntgen, Daniela Patino Pineros, and Victoria Tongue. A recording of the workshop was also shared with Daniela Werner and Manuel Pirino. The workshop provided an opportunity to present key findings and to test initial recommendations. Comments from the workshop were incorporated into the final report analysis.

Lessons Learned Workshop

A workshop was held in Berlin on 26th April. All National Chapters were present in person or online, with the exception of Russia. Participation from the Secretariat included: Irem Röntgen, Daniela Patino Pineros, Paula Laurinmäki, Manuel Pirino and Victoria Tongue. The workshop provided an opportunity for National Chapters to reflect on the findings in this report, and collectively to identify lessons that may be relevant to future potential programming. A separate lessons learned document accompanies this report.