

Adaptive, Risk-Based Approaches to Anti-Corruption in Covid-19 Responses (ARBAC-19) Final Evaluation - Management Response, June 2023

Introduction

This management response outlines how Transparency International Secretariat (TI-S) plans to follow up on the findings and recommendations of the final evaluation of the ARBAC-19 programme.

The independent evaluation took place between March-April 2023 through an initial desk review followed by interviews conducted with staff from TI-S, involved chapters as well as DRL,¹ who was the donor for the ARBAC-19 programme. The evaluation exercise culminated at the final project workshop which took place between 25-26 April 2023 at the TI Secretariat premises in Berlin.

The final evaluation report provides useful reflections and feedback on the ARBAC-19 programme strengths as well as areas that can be strengthened in TI's future programme design, implementation and strategic direction - therefore providing practical recommendations for consideration after the completion of the project from June 2023 onwards for broader organisational consideration and implementation.

TI-S is very much encouraged by the findings of the evaluation. In particular, we welcome the confirmation of the continued high *relevance* of the programme, its *coherence* with the wider TI strategic purpose as well as the *sustainability* efforts that were taken up following the ARBAC-19 project at Chapter level, including the examples from TI Brazil, TI Kyrgyzstan and Zimbabwe.

Albeit conceived as a "learning exercise" at the onset of the pandemic, the project also yielded highly valuable toolkits with possible upscaling in other countries as acknowledged under the evaluation report, which is an encouraging development.

We are also motivated to see that the ARBAC-19 project provided some important lesson-sharing and exchange opportunities amongst project stakeholders (Chapter-Chapter and Chapter-TIS)². These were achieved through the best practice blogs,³ various regional advocacy events such as the International

¹ US Department of State, Bureau of Democracy, Human Rights, and Labor

² Transparency International Secretariat

³ <https://www.transparency.org/en/blog/brazil-honduras-zambia-empowering-local-action-corruption-covid-response>; <https://www.transparency.org/en/blog/open-data-covid-19-argentina-hungary-honduras>

Consortium for Social Development in Johannesburg, South Africa⁴ and the regional event organised by TI Chapters in Latin America with a focus on lessons sharing on the use of public resources in health systems, as well as the IACC⁵ (International Anti-Corruption Conference) representation of three project implementing chapters. Further to add here are the recently published [best practice compilation report](#) and the final project workshop that took place at the end of April 2023.

The recognition of the efforts to a more coherent programme over the project implementation period is also welcomed, particularly noteworthy initiatives here being the best practice blogs, improved quality of quarterly donor reports.

As noted in the evaluation report's 'Limitations' section, we acknowledge the constraints in terms of the scope, budget and monitoring approach limiting the ability of the final evaluation exercise to draw meaningful conclusions on impact. Nevertheless, we appreciate the efforts that the evaluators have made, even with these constraints, to help articulate and highlight the changes that were achieved through the project, although they were not fully captured in the formal results framework, including absence of outcome-level data, theory of change, and limited direct data verification.

We thank our partner DRL for recognising the importance of flexibility and support for local civil society organisations in this unique project, especially in the challenging context of the COVID-19 pandemic, narrowing civic space and changing political climates including elections in multiple project countries.

Feedback on Recommendations and TI-S response

Overall, TI-S accepts all the recommendations made by the final evaluation team. As the ARBAC-19 project officially came to a close on **31 May 2023**, our follow-up from the evaluation recommendations will focus mainly on the organisational recommendations and points of action, which mainly address programme design, monitoring and implementation phases. For the areas of improvement that the evaluators identified which have broader organisational implications, we will share and discuss these with the relevant teams, following the action plan and timeline that was agreed and will be followed upon at the organisational level.

TI-S follow up on the Recommendations

Below is a summary of the evaluators' recommendations derived from the final evaluation exercise, and how TI-S foresees to respond and follow up on these:

1. Walk the talk:

⁴ <https://www.socialdevelopment.net/icsd-africa-branch/>

⁵ <https://iaccseries.org/>

Action 1 – MEL staff budget allocations: In terms of MEL standards and frameworks, we *acknowledge and agree* that the MEL resources (both final evaluation and MEL staff) allocated to the project were not sufficient considering the complexity and diverse nature of implementing partners, and for a rather complex field of work. In new project proposals, we do consider allocating 5-10% of the overall project budget to monitoring, evaluation and learning as good practice. This commitment/recommendation will also be included in our MEL policy, which will be finalised later in 2023.

Action 2 – Build a theory of change (ToC) into each project: We do acknowledge the importance of having a theory of change that describes the pathway to change and the underlying assumptions for all of our projects and this is already good practice in the majority of cases. It is part of our project development process and “*Guidance on the Proposal Development Process*”. We further recognise the need to revisit projects’ theories of change during the inception phase and using agile approaches that allow us to remain adaptive to possible changes in the context. This particularly applies to ARBAC-19, which was a “learning exercise” in a relatively new area where contributing chapters were only selected during the inception phase. In addition, the world adapted to COVID-19 at a rapid pace and policy and political developments were emergent and could not always be foreseen. We therefore commit to revisiting projects’ theories of change during the inception phase using participatory approaches.

Action 3 - Accelerate efforts in the development of internal MEL frameworks for each project linked to TI overall strategy: ARBAC-19 was developed before the current TI-S Strategy (Strategic Plan, previously Implementation Plan) was in place. However, the project was already reflected in our organisational annual planning and reporting. Further, we are currently developing templates and guidance for standardised project MEL frameworks, that – amongst others – align projects to the strategic MEL framework. Finally, in our organisational structure, all projects are now linked to strategic programmes, and will participate in regular reviews and discussions led by the programme manager/policy lead.

Action 4 - Strengthen verification and quality assurance processes: We *agree* to the observations of the evaluators on this point. The project was developed and implemented during a pandemic, which meant that strong restrictions for *international travel and field visits* were in place. That being said, we acknowledge the need to validate data and to budget accordingly for more field visits with MEL-related objectives. We will further continue to pay increased attention to strengthening the MEL capacities and skills of project managers, using our MEL e-course and in-house training.

Action 5 - Negotiate more explicit freedom to pilot and refine programme tools and approaches during inception phases: We do *agree* that a participatory online or in-person review/planning workshop during the inception phase with project partners is best practice and should be embedded into project plans, including a review of the results framework and theory of change. While this is a standard for all forthcoming projects, we further intend to be more propositional and proactive in making the case for flexibility with donors to enable this wherever possible on future projects, especially in complex, fast-moving external contexts, but may also be constrained by their procedures in allowing this.

Action 6⁶ - Develop definitions for project indicators⁷: We do *agree* that reporting guidance should be provided on indicators and relevant reporting terminology to project partners. For new multi-country projects, we plan to follow good practice already implemented on some ongoing projects to develop and update a ‘project handbook’ with key information and definition, to support consistent knowledge management across changes in project staff at both TI-S and project partners.

2. Provide training on public procurement

Action 1 – Develop a manual for monitoring and countering corruption in emergency response management. We *agree* to this statement. As noted in the final evaluation report, we have published a best practice compilation derived from the good practices from 10 national chapters in the ARBAC-19 project which will then provide a basis for such future manuals. We may also consider an (online/in-person) training in this area with the TI movement communities of practice in emergency response management area depending on project funding.

3. Create chapter profiles

Action 1: Build a basic template for self-reporting and Action 2: Request National Chapters to complete the profiles during the reaccreditation process: This recommendation refers to the necessity to include chapter capacities in the project planning phase. We *agree* to this statement and can report that such chapter profiles have already been identified and are planned for 2023.

As the organisation is migrating some of its systems to the Salesforce platform, progress has been achieved in feeding and maintaining updated information from the chapters on its key governance issues. The step that will follow in the second half of 2023 is the integration with the chapters’ basic information, also defined as “country profiles”, where elements like members of the chapter, contacts, key strengths and thematic areas of work, will be added. An additional and key step that we will integrate, as rightly suggested in the evaluation report, is information regarding management capacities.

4. Develop an emergency response strategy

Action 1 - Incorporate emergency preparedness and response⁸ in the next iteration of the TI global strategy: Substantial changes to the TI Strategy 2030 requires a movement-wide process. While we will consider embedding emergency responses into our global strategy, as a more immediate action we will develop policy positioning for TI-S led global/regional projects and initiatives, based on the learnings from

⁶ Previously under Recommendation 2 “Provide training on public procurement”, Action 1. However, as project indicators have to do with MEL tools and frameworks, we decided to move this action item under Recommendation 1 (Walk the talk).

⁷ In Aleph’s final evaluation report, the terms “programme” and “project” have been used interchangeably. As this was an evaluation of a single project, namely ARBAC-19, we’ve revised the wording into “project”.

⁸ We consider “emergency response management” instead of “emergency preparedness and response” at TI-S, encompassing both of these areas.

ARBAC-19. For example, the new global climate governance integrity project that started recently for more than 20 countries, includes substantial budgetary flexibility to incorporate specific emergency responses if the need arises before end of 2025.

Action 2 - Develop an action plan for emergency preparedness. We do *agree* to the proposal of the evaluators on developing and deploying “pre-baked/model ToC” templates and have already started discussions during the final project workshop involving the ARBAC-19 chapters. We plan to develop a list of policy recommendations, guidance and assumptions based on the learnings of this project. The best practice compilation report will help identify underlying assumptions in relation to emergency response management, covering a wide geographic area with diverse political contexts and varying levels of legal/institutional capacity.

Final

remarks

TI gratefully acknowledges the support of DRL as an important partner in our work, through their support to the COVID-19 related corruption risks, especially considering the project was designed at the beginning of the pandemic with a lot of unknowns, in terms of implications for civil society, the global political and security order, changing political environments and stakeholders (i.e. elections) and shifts in public agendas in the past three years since the onset of the pandemic.

We are looking forward to further discussing the conclusions of this report internally within the TI movement and with DRL and our other donor-partners, and to engage in a dialogue over the coming months around the potential for continued future collaboration in the area of emergency response management, building from the recommendations and findings of the final evaluation report.

We also extend our sincere thanks to the evaluators, Aleph Strategies, in enabling this process to be such a useful learning exercise for TI-S, which has added value to our organisation beyond just the scope of this project.