Evaluation of the IMPACT Grant

Final Report

September 2021
Acronyms

ACTION  A grant funded by the European Commission (EU INTPA)
ALAC    Advocacy and Legal Advice Centres
Aleph   Aleph Strategies
BICA    Business Integrity Country Assessments
CPI     Corruption Perceptions Index
CRIMJUST The EU-funded global programme ‘Strengthening Criminal Investigation and criminal justice cooperation along drug trafficking routes’ implemented by the United Nations Office on Drugs and Crime, launched in 2016
DRC     Democratic Republic of the Congo
EU      European Union
EUROsociAL A cooperation programme between Latin America and the European Union
FTE     Full-time equivalent
GAC     Global Affairs Canada
GACC    Global Anti-Corruption Consortium
GCB     Transparency International’s Global Corruption Barometer, a worldwide public opinion survey on views and experiences of corruption.
GDPR    General Data Protection Regulation
GIZ     Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH
IMPACT  Integrity, Mobilisation, Participation, Accountability, Anti-Corruption and Transparency Grant, donated by Global Affairs Canada
KII     Key Informant Interview
LAC     Latin America and the Caribbean
LGBTIQIA+ An inclusive acronym encompassing the communities of all those with minority sexual and gender identities, atypical biological sex or Intersex, and allies of these communities
MTR     Mid-Term Review
NC      National Chapter – country-based anti-corruption organisation, affiliated to Transparency international
OAS     Organisation of American States
PMF     Performance Measurement Framework
SWOT    Strengths, Weaknesses, Opportunities and Threats
TI      Transparency International – global charity fighting corruption
TI-S    Transparency International Secretariat (based in Berlin)
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Acknowledgements

The tight timetable demanded highly efficient and collaborative working throughout from all parties involved. We acknowledge with particular appreciation the efforts of the small IMPACT team, the National Chapters (especially those chosen as case studies), as well as the many other informants who found time in their busy schedules to talk to us.
Executive Summary

This is an end-of-programme evaluation of the Integrity, Mobilisation, Participation, Accountability, Anti-Corruption and Transparency (IMPACT) Grant, funded by Global Affairs Canada (GAC). The Grant, amounting to 8.6m euros over 5 years, was the largest single donation received by Transparency International’s Secretariat in Berlin. It was used to fund anti-corruption work by TI National Chapters in Guatemala, Honduras, Jamaica, Peru, Trinidad and Tobago, Democratic Republic of the Congo (DRC), Ghana, Nigeria, and Mozambique.

The following crystallises our replies to the key questions set out in our terms of reference (ToR)¹. It is a summary intended for readers who need to quickly see the findings most relevant to the itemised agenda given to us². It does not cover every topic raised in the body of the report. It should be read alongside the data and contextualisation presented there and in the light of the explanation of the methodology and its limitations given in Appendix 1.

Overall, our evaluation found that the Grant had made a significant positive contribution to the global fight against corruption. But it missed some opportunities to make a good effort even better. There are some important lessons to be learned going forward to maximise the use of precious donated resources such as this, especially in relation to mainstreaming gender.

Relevance

Alignment of the Grant with the priorities and policies of the target groups, TI and the donor organisation?

The IMPACT Grant was aptly designed to support a very broad range of anti-corruption work. It showed sufficient flexibility to accommodate changing needs of the National Chapters and was generally well aligned with the strategic objectives of TI and the donor. Yet IMPACT did not engage with key stakeholder groups in the design of its objectives or activities: by and large, it was intended to sustain and boost existing

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¹ A simple tick (satisfactory), cross (unsatisfactory) or tick and cross (mixed results) is used to signpost the broad thrust of the verdicts.

² i.e. the list of questions specified in our terms of reference (and set out in their order in this executive summary).
projects already initiated by National Chapters. Yet a needs assessment could have helped participating National Chapters and the Secretariat in energising and supporting desired work on business, in relation to 'gender-mainstreaming' and in founding an even deeper and more dynamic relationship between the Secretariat and Chapters.

Utility of the Grant’s Theory of Change and the resulting Logic Framework? Validity overall of the Theory of Change and underlying assumptions?

There is no explicit Theory of Change, but the Secretariat’s ‘Project Information Summary’ was treated as such by the Mid Term Review. This document does not flesh out in narrative form critical assumptions between activities, outputs, outcomes and impact, or risks and mitigation strategies. The relationship between the Project Information Summary and Programme Logic Model is not altogether clear: the former contains statements about sustainable economic growth which are not picked up in the latter, or in the related Performance Measurement Framework (PMF). Generally, the PMF is technically sound but the top-level impact indicator - positive movement in Transparency International’s Corruption Perceptions Index (CPI) is mostly viewed by National Chapters and other stakeholders as invalid and largely uninformative for Grant performance management purposes. This is due mainly to its exclusive focus on public sector corruption and its tendency to lag behind change on the ground. Finally, the Logic Model and PMF were ‘top-down’ documents, finding little real traction in a strongly ‘bottom up’ organisation. A more informative and ‘bottom-up’ measurement framework could have been considered alongside reporting arrangements more tailored to local interests and realities. Strongly participative approaches could have helped embed the intervention logic, making the associated key PMF a management tool that was more relevant and active day to day.

Impact

Positive and negative changes produced by the Grant directly or indirectly (including the main targets and outcomes/ impact, intended and unintended)?

Overall, IMPACT performed well, showing some strong results, especially at the intermediate outcome level. There are clear cases where community members - through ALACs - challenged corruption and paved the way to permanent legal and policy changes. There is evidence of the consolidation of strong social audit networks, some with a strong presence of

women’s organisations and LGBTQIA+ groups. Yet recorded high-level perceptions of corruption in target countries did not seem to improve much, if at all, over the course of the Grant. Most informants, supported by the academic literature and TI expertise, suggest the discrepancy is likely to reflect the poor choice of a high-level indicator, tending to exclude business and private sector corruption and with ‘lagging’ tendencies.

Regarding outcomes and impacts not directly foreseen in IMPACT’s PMF, the Grant’s expected results were defined very broadly so as to embrace the diverse work of the Chapters. This inhibited descriptive depth and meant that visualisation of results and progress was difficult. For example, strategic litigation and its impacts are not directly and fully captured by the Logic Model (though these were not characterised as unintended by stakeholders). In general, changes in IMPACT activities may be better understood as contingency actions, rather than unintended outcomes.

Importantly, we found the aggregated results potentially misleading as they are boosted by reports from well-performing Chapters, even where management was requesting specific improvements against certain indicators. The technique for aggregating and reporting results, though improved after YEAR 4, was sub-optimal and would likely have benefited from more bottom-up, country-specific approaches to the Framework itself.

Key outcomes/impact achieved in the three result areas so far and how this compares with expectations? Value added by the Grant to the outcomes/impact achieved?

Best results are for outcome 2: Anti-corruption policy and practice at institutions. The worst performing area was in relation to outcome 3: transparency, accountability and integrity of business practices, where results are very limited.

Outcome 1100: Empowered people, groups and communities (including women and marginalized groups) demonstrating that corruption can be challenged effectively. The IMPACT grant performed satisfactorily in this area, with some strong intermediate outcome results in challenging circumstances. There are clear cases where community members - through ALACs - challenged corruption and paved the way to permanent legal and policy changes. Three new ALACs were created with IMPACT funds; 156 cases were pursued; and 9 concrete cases which resulted in sustained legal or policy changes. There is evidence of the consolidation of strong social audit networks, some with a strong presence of women’s organisations or LGBTQIA+ groups with their own governance and presence throughout the country (for example, Colombia and Guatemala): 461 outreach activities.
were organised with students, women and marginalised communities, and 168 partnership agreements with were formed with associations (i.e. media, universities and community centres). However, recorded high-level perceptions in target countries regarding whether ordinary people can make a difference in the fight against corruption remained relatively the same, on average, over the course of the Grant. This discrepancy may reflect the choice of an inappropriate high-level indicator.

Outcome 1200: Improved and gender sensitive anti-corruption policy and practice by local, national and regional public institutions, including on security. The IMPACT programme performed well in this area. There is substantial evidence that target countries improved anti-corruption policy and practice at the local, national and regional level: 46 laws / policies were enforced by institutions at national / local level; 7 institutions now have complaints mechanisms or referral systems in place; 4 institutions implemented ‘codes of conduct’; 4 security and justice institutions implemented transparency, accountability and integrity standards; 1 regional body (OAS) adopted TI-recommended policies on integrity standards. However, it is not always clear how far IMPACT contributed to these outcomes because the activity was sometimes part-financed through other funding streams or performed with other organisations. Yet, given IMPACT represented a significant amount of core funding for most chapters, it is fair to consider IMPACT overall as important if not invariably instrumental.

Outcome 1300: Increased commitment to transparency, accountability and integrity in business practice. IMPACT performed unsatisfactorily in this area; but perhaps this is unsurprising given that TI-S estimates that only 4% of total funds were spent on staff and activities related to this outcome. Aggregated results reflect a Grant which met or exceeded 2 of 3 intermediate outcome indicators: 81 businesses implemented ‘integrity standards’ (i.e. capacity building, whistle-blower mechanism, complaints mechanism); and 7 companies were found to have improved practices. Yet, these results are concentrated in two countries: Honduras and Colombia; whereas results were also expected in Mozambique, Nigeria and Trinidad & Tobago (no achievements listed at intermediate outcome level).

Key outcomes/ impact achieved for women and other vulnerable groups?

Though the Grant was used to make much-needed improvements in anti-corruption performance in relation to women (advancement of the gender agenda and improved awareness and tools on the importance of gender mainstreaming at all
levels), **progress overall was achieved too late and too little and has not been tracked effectively.** An important opportunity to bring in specialised support at TI-S level was missed. Unfortunately, there is still no specialist support and overall strategy to carry forward and amplify the substantive progress on gender-mainstreaming and gender-sensitive approaches that have happened because of IMPACT.

**Sustainability**

What are the major factors, that will influence the achievement or non-achievement of sustainability of the grant?

The evaluation team found that, technically, **planning for sustainability was somewhat poor**. At Secretariat level, there was **no satisfactory exit strategy**, no meaningful ‘learning-agenda’ approach, nor a genuinely active risk/mitigation strategy that might have helped keep National Chapters and the Secretariat on top of these (and other) challenges.

GAC have indicated that they will not fund a continuation of IMPACT but are considering an application for a project focussed on sub-Saharan Africa and with a gender theme. This could impact the net gains of the Grant for National Chapters that are left behind if they are not sustainable without IMPACT funds.

To what extent are the TI implementing partners able to ensure the sustainability of grant outcomes in terms of integrating aspects of the work in their future work and in terms of capacity (financial, personal and skills)?

**Few Chapters rose to the Programme challenge** to report as an output their preparations for preserving activities and gains beyond the Grant. We learned from our Case Studies that there have been some discussions about sales of services and materials and different types of donors (for example, foundations) but the overall picture looks patchy.

Yet we found that most ALACs appeared to have been adopted as core and continuing business for the National Chapters, if they had not been at the start of the Grant. We learned that **multiple donors are supporting many ALACs going forward** or that ALAC components had been incorporated in different

4 We gathered that staffing gaps had affected the availability of a fundraising specialist at TI-S who could have supported work in this area.
projects with different donors. This is positive and will help sustainability. We noted too that the data did not suggest that National Chapters would cease operations after IMPACT - though some will clearly experience difficulty given the percentage of core funding the IMPACT grant represented.

Effectiveness and Efficiency

*How far did procedures and use of resources contributed to or hindered the achievement of targets? For example and in particular, how were recommendations from the mid-term evaluation processed and implemented?*

Looked at only in terms of implementation of the Mid Term Review recommendations, **overall the Grant was administered to a satisfying standard of effectiveness and efficiency.** Very good progress was made on recommendations related to effectiveness, such as fostering relationships and networking amongst National Chapters. Some good work was also done to implement IMPACT-related recommendations, for example use of investigative journalism to support ALACs. The Programme performed less strongly on remaining elements. Despite efforts on 'gender mainstreaming', the recommended investment in a gender specialist was not made, despite evidence of a serious gap. Similarly, investment in ALAC support at TI-S level fell somewhat short of what was recommended.

Lessons Learned

The IMPACT experience shows the possibility of respecting the anti-corruption principles of flexibility, agility and localism within the context of Programme funding. This is a crucial good practice going forward. However, IMPACT also points to some lessons that need to be learned if the Programme approach is to work optimally for all participants. Our report explains those lessons and accompanies them with 11 recommendations. The following brief summaries are provided for convenience and should be treated as no more than introductory.

• **The design of the Grant was too ‘top down’ in a strongly ‘bottom up’ organisation. It missed some important opportunities as a result.** Though the Grant was intended to sustain and boost projects already initiated locally, a needs assessment could have helped Chapters and TI-S energise and support desired work with businesses, in relation to ‘gender-mainstreaming’, and generally in founding an even deeper and more dynamic relationship with TI-S. This in turn
would likely have helped identify and tackle obstacles and operating issues lying behind at least some of the reasons for the slow start and Programme overrun.

- The high-level indicators for the Grant were chosen in an unduly siloed manner, failing to engage not only the National Chapters but also missing important expert resources available within TI-S itself. Closer engagement with the Chapters would have supported the design of appropriate ‘localised’ measurement frameworks, ensuring data was useful to those required to collect it. Instead, the Grant was saddled with a generic and largely inappropriate measure of country CPI scores.

- Additional technical input at National Chapter level is needed to cope with the shift from core to programme funding and to benefit from the disciplines that come with it. The allocation of Grant resources to TI-S, though substantial overall, was insufficiently responsive to the needs of the National Chapters in this regard. It also failed to supply vital specialised input for gender work and for the ALACs.

- A complex and challenging Programme such as IMPACT requires an adequately resourced, high performing and well-motivated team to manage it effectively and efficiently. When staff levels are inadequate or specialist resources need to be brought in, these should be prioritised.

- There is an opportunity for TI-S to routinely provide detailed financial reports (i.e. variance in spend; FTEs; and spend by outcome) to programme teams and donors (going beyond some donor requirements). Such reports are commensurate with the challenges of a large grant of this kind and would be useful to compare/contrast with PMF results to understand if there is a correlation with results and ultimately in which area the programme is providing value for money.

- the highest possible standard of transparency and accountability in its financial reports to all donors – going beyond some donor requirements. Such standards are commensurate with the challenges of a large flexible grant of this kind.

- Similarly, an opportunity to handle project risk management as an active process of disclosure and open, ongoing collaborative management. TI could take a lead in this area.
• We also identify as a lesson to be learned that **National Chapters should produce Final reports at their level, even if short**. This would help improve Programme visibility, maintain institutional memory and show that TI practices at all levels the reporting, accountability and transparency behaviours to which it is publicly committed.

• IMPACT’s aims to get a step-change in the important area of gender mainstreaming were only partially successful. **The Programme suffered throughout from the lack of trained and dedicated staff.**

**Recommendations**

1. **TI-S and the donor(s) should see to it that such Programmes are created in a more ‘bottom-up’ fashion.**

2. **TI-S and the donor(s) should ensure that design of the results framework and its indicators should also be an inclusive, participative and reviewable process, informed by the best available expert advice.**

3. **TI-S should provide better technical support to National Chapters for their participation in the Programme management process, so that they can derive real benefit from it.**

4. **Top TI managers should see to it that stable Secretariat support is available throughout the life of such projects and that staff resources are adequate and managed to make the quality contribution demanded.**

5. **TI-S and donor(s) should provide specialist strategic support in the Secretariat for national ALAC cases to develop the Grant’s gains.**

6. **TI and donor(s) should ensure that trained and dedicated staff are available to provide support on gender mainstreaming throughout gender-themed Programmes.**

7. **In potential new collaborations the ‘Global Affairs Canada's Feminist International Assistance Gender Equality Toolkit for Projects’, or other available international tools should be applied systematically.**
8. TI-S should publish clear criteria on all budgetary allocations to National Chapters, as was done for the ‘mini grants’.

9. Irrespective of donor requirements, TI-S should seek to routinely provide highly informative financial reports to the programme team and to the donor. For instance, spend by outcome; FTEs; and major variance in spend.

10. All National Chapters should produce final reports, with aggregated data, organised by their unique Performance Management Frameworks.

11. There should be a joint National Chapter/TI-S mechanism for actively reviewing and managing risks. Risks should be openly identified and managed as part of a core commitment to transparency.
1. Introduction

1.1. Purpose and Scope

Transparency International (TI) contracted Aleph Strategies (Aleph), to conduct a high-level final evaluation of the Integrity, Mobilisation, Participation, Accountability, Anti-Corruption and Transparency (IMPACT) Grant, funded by Global Affairs Canada (GAC). The Grant, amounting to 8.6m euros, was used to fund anti-corruption work for five years. The purpose of the evaluation was to provide an external analysis of Grant performance against expected results, as well as to highlight any unforeseen positive or negative outcomes and to help learn lessons going forward.

1.2. Background

TI works to combat corruption globally through locally established, independent National Chapters. It seeks to expose the systems and networks that enable corruption to thrive in particular contexts, and then implement measures to address them.

The IMPACT Grant Programme aimed to boost TI’s work in 3 target areas:

1. Businesses - to improve their practices;
2. Public bodies - to develop and enforce better anti-corruption legislation and practices; and
3. Individuals and communities - to empower them to address corruption.

The principal stated expected outcomes were:

- **Empowered people, groups and communities** demonstrating that corruption can be challenged effectively;
- **Improved anti-corruption policy and practice** by local, national and regional public institutions, including on safety and security;
- **Increased commitment to transparency, accountability and integrity in business practice**; and
- **Reduction of corruption** in the participating countries.

Importantly, gender mainstreaming was set as a central cross-cutting theme to be integrated into Programme activities.

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5 https://www.transparency.org/en/our-national-Chapters
The IMPACT Grant worked with eight TI National Chapters in the Americas: Argentina, Colombia, Guatemala, Honduras, Jamaica, Peru, Trinidad and Tobago, and Venezuela. A further four National Chapters in Africa were assisted by the Grant: Democratic Republic of the Congo (DRC), Ghana, Nigeria, and Mozambique.

IMPACT was the largest single Grant received by TI-S during the 6 years under review. The next was a European Commission Grant of 6.8m euros (over broadly the same period, i.e. 2016-2020). Both Grants were overseen by a small group of staff, with two members working full-time on the Programme management of the IMPACT Grant and assisting with implementation activities such as regional advocacy and capacity building. National Chapters have been largely responsible for implementation of activities at national level and reporting IMPACT-related results, which are then extracted by TI-S and reported on a bi-annual basis to the donor alongside other relevant data.

1.3. Methodology Note and Limitations

The full methodology is at Appendix 1. In summary, Aleph gathered qualitative and quantitative data remotely using different techniques, including interviews with key informants (KIs), Outcome Harvesting Workshops with National Chapters, Case Studies, and extensive reading of results data as well as available academic literature.

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Interviews and workshops were conducted in English, Spanish, Portuguese and French, depending on the preference of the interviewees. Our research adhered to ethical protocols, including participant confidentiality and the EU’s General Data Protection Regulation (GDPR).

The evaluation was required to be planned, conducted and delivered remotely over a short timescale of 6 weeks in August and September 2021. This and some associated staff availability issues limited the scope and extent of activities: it was not possible to look in detail at all National Chapters or investigate in depth all possible avenues of enquiry. The evaluation had also limited capacity to reach fully independent conclusions about Grant impact and effectiveness, because it was largely reliant on the quality and accuracy of monitoring and evaluation data generated by the National Chapters themselves.

We aimed to manage the risk of bias by cross-checking or triangulation, by spot checking source data coherence where possible, and by reviewing any secondary data sources such as information from parallel projects executed by others. We quizzed informants including external voices (such as past and potential donors, commentators and former staff) on their experience of IMPACT and how challenges have been addressed. The Report aims to highlight any data gaps and areas where it is not possible to draw robust conclusions about Grant impact and effectiveness. Overall, and despite some gaps in available data\(^7\) we are satisfied that the methodology has provided a robust high-level verdict on the impact of the Grant, identified key lessons learned and generated practical recommendations going forward.

\(^7\) The lack of a final report of the Grant with aggregated data on which this evaluation could build was a particular constraint, though we recognise the efforts made by the team at TI-S to try to overcome it.
2. Findings

2.1. Expenditure and Activity

Expenditure

![Figure 3: IMPACT Grant Expenditure Overview](image)

TI-S estimate that they will have spent nearly 100% of the Grant (8,986,130 euros of a total donor budget of 8,988,809 euros). Direct support to National Chapters from IMPACT is reported to amount to some 5 million euros, just over half of the Grant (56%). This does not include payment of travel costs to Chapter staff and payment of local service providers directly by TI-S.

Approximately 17% of the total Grant expenditure is reported as on TI-S employees in Berlin. These comprise:

- IMPACT team – 3 people: 1 Programme Lead, 1 Programme Officer, 1 Finance Expert (partly funded);
- Team Manager (partly funded through IMPACT);
- ALAC Programme Lead;
- Regional Advisor Americas (partly funded by IMPACT);
- Regional Advisor West Africa (partly funded by IMPACT);
- Global Safety and Security Manager (partly funded by IMPACT);
- Communications/research positions (partly and occasionally funded by IMPACT);
- Global Advocacy Coordinator (position partly funded by IMPACT for some time); and
- Monitoring Evaluation and Learning Manager (position partly funded by IMPACT).
The remainder of the Grant was spent on subcontractors (7%); travel (3%); other direct costs (6%) and an administrative allocation of 11%, towards TI general costs.

Although total expenditure was in line with the budget this was only because a significant overspend on employees was offset by underspending on travel and other direct costs\(^8\). There was significant underspending on work on database and technology as well as tools and translations.

The Grant financial management reports sent to GAC and to the IMPACT programme team did not analyse expenditure by the 3 outcome areas of activity\(^9\). We note, however, that TI-S provided this financial analysis to us when requested. This level of analysis could have been useful throughout the lifespan of the Grant, as it would have shed light on the level of relative effort in relation to underperforming outcome areas, such as 1300: increased commitment to transparency, accountability, and integrity in business practice. The Grant spent merely 4% of total funds on this outcome, in contrast to 54% on outcome 1100 and 25% on outcome 1200\(^10\).

We noticed some difficulty reconciling reports of expenditure on National Chapters, due it seemed to differences in how some items of expenditure are treated internally\(^11\). However, we are clear that participating National Chapters\(^12\) received initial allocations varying between some 6% and 12% of the re-Granted budget (5 million euros). Surprisingly, no records of the basis for those allocations were able to be made available to us and we could not detect any obvious explanatory factors. We looked at the size and scale of national operations, income ranking and the size of affected population but found that National Chapters received roughly the same allocation despite varying circumstances. For example, Trinidad and Tobago received approximately 8% of the budget re-granted to National Chapters (population of 1.5 m) and Nigeria 12% (population of 200 million). TI-S informed us that the budget

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\(^8\) The report showed that underspending on direct costs included the cost of auditing National Chapter accounts, but we were informed that TI-S had in fact amended sub-grant agreements so as to transfer the allocated costs directly to National Chapters, albeit without reflecting this change in the final financial reports.

\(^9\) The Evaluation Team asked TI-S for ‘Spending apportioned to the 3 outcome areas, disaggregated by chapter and Secretariat and detailed by broad activities if the data allows that to be meaningfully done’ and were told that ‘this was not recorded throughout the programme.’ This seemed borne out by the draft ‘Final detailed financial report’ subsequently provided to us, which contained no such breakdown. We raised this as a concern and the information was supplied, together with assurances that it has been provided on request.

\(^10\) It would be expected that outcome 1300 would spend less given fewer countries were targeted. However, the level of difference is still striking and could have supported the IMPACT team in understanding why the Grant was underperforming in this area.

\(^11\) For instance, reports provided to us about the financial dependency of TI-S on the Grant appeared to count ‘Chapter support’ in different ways, in one case including only direct support through grants, and in another for example payment of travel costs to Chapter staff or payment of local service providers directly by TI-S.

\(^12\) This excludes Mozambique given they left the IMPACT grant in Year 3.
allocations may have been based on National Chapters’ assessments of potential contribution and budget and, if so, this should have been fully documented and the criteria for the awards preserved.

Figure 4: Breakdown of Budget Allocation to National Chapters

Mozambique underspent and left the Programme apparently by mutual consent\(^\ref{13}\). Funds were reassigned to boost key areas of work such as further ALAC development, regional work and gender mainstreaming. Initially, there was a plan to strengthen regional work in African National Chapters, but this did not happen. No one we interviewed was able to explain or remember the basis for this reallocation. Subsequent initiatives (for example covering mini-Grants in relation to the Covid-19 initiative) were subject to transparent guidelines and selection criteria.

The period of the Grant was April 2016 to September 2021 – a third longer than originally planned. Two no-cost extensions were approved. The first was justified by reference to unfavourable political contexts, unexpected exchange rate fluctuations between the Canadian dollar and the euro\(^\ref{14}\), and special circumstances affecting the Mozambique National Chapter which had resulting in an underspend of nearly half a million euros. It also cited foreseeable bureaucratic issues surrounding sub-Grant agreements with National Chapter contracts. The second extension was grounded (as in many other interventions in the international development sector) on the impacts caused in the implementation by the COVID-19 pandemic.

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\(^{13}\) The annual report for Year 3 does not elaborate on the reasons for departure, although it reports that the resulting additional funds of Mozambique were reassigned to focus on areas of further ALAC development, Africa regional work and gender issues, and new editions of the GCB. (IMPACT Annual report Y3. Page 6.)

\(^{14}\) Reported by TI-S to have generated a gain of 247,000.00 EUR.
The Programme’s slow start\textsuperscript{15} is clearly reflected in the rate of expenditure in the first year compared to the second. Colombia, Ghana, Honduras, Jamaica, Nigeria, Trinidad and Tobago and Venezuela doubled the amount of budget executed from year 1 to year 2\textsuperscript{16}. There was a threefold increase in Nigeria’s spending over the same period.

We saw little evidence to support the suggestion put to us that delays in disbursing funds had resulted mainly from TI-S leveraging timely submission of reports and more specific replies to particular questions. We noted that TI-S had reported underspending to the mid-term review (MTR) team as an ongoing problem and saw associated inferences about the quality of Grant design and the need for National Chapters to be better supported in the planning stages and technically thereafter\textsuperscript{17}. Since the mid-point (Y3), efficiency improved in relation to spending and implementation.

\textsuperscript{15} For example: sub-Grant contract agreements with National Chapters could be signed only between June and August 2016, creating a 3 to 5 months’ expenditure gap from the official start of the Grant in April 2016.

\textsuperscript{16} Final financial reports were not available at the time of this evaluation. Information obtained from ‘draft Final detailed financial report’.

\textsuperscript{17} IMPACT grant mid-term evaluation Final Report, page 41 and footnote 14.
### Activities

**Figure 5: IMPACT Grant Logic Model**

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<th><strong>Ultimate Outcome</strong></th>
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<th><strong>Intermediate Outcome</strong></th>
<th><strong>Immediate Outcome</strong></th>
<th><strong>Outputs</strong></th>
<th><strong>Activities</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>1000 Increased transparency, accountability and integrity at all levels and across all sectors of society</td>
<td>1100 Empowered people, groups and communities (including women and marginalized groups) demonstrating that corruption can be challenged effectively</td>
<td>1200 Improved and gender-sensitive anti-corruption policy and practice by local, national and regional public institutions, including on security</td>
<td>1300 Increased commitment to transparency, accountability and integrity in business practice</td>
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<tr>
<td>1110 Increased support to victims and witnesses of corruption, including women</td>
<td>1220 Increased public understanding of, support for, and engagement in the fight against corruption</td>
<td>1120 ‘Know your rights’ campaigns targeting women and marginalized groups developed and conducted</td>
<td>1211 ‘Know your rights’ campaigns targeting women and marginalized groups developed and conducted</td>
<td>1211 ‘Know your rights’ campaigns targeting women and marginalized groups developed and conducted</td>
<td></td>
</tr>
<tr>
<td>1111 Support mechanisms for victims and witnesses of corruption, including women, created and strengthened</td>
<td>1221 Partnerships with other organizations, including women’s rights organizations established</td>
<td>1121 Surveys conducted and reports disseminated on experiences with and attitudes towards corruption, including the perspectives and issues faced by women and marginalized groups</td>
<td>1213 National and local public integrity assessments and related campaigns conducted</td>
<td>1111 Set up/cope up and expand ALCA, 1112 Legal assistance, campaigning, lobbying stakeholders and partnering with other organizations around resolving identified strategic cases</td>
<td></td>
</tr>
<tr>
<td>1112 Redress for corruption on targeted strategic cases provided</td>
<td>1222 Supporter’s base for stronger engagement and chapters’ sustainability created</td>
<td>1131 Surveys conducted and reports disseminated on experiences with and attitudes towards corruption, including the perspectives and issues faced by women and marginalized groups</td>
<td>1212 Reports and campaigns on the gaps between security and justice standards and reality published and conducted</td>
<td>1212 Reports and campaigns on the gaps between security and justice standards and reality published and conducted</td>
<td></td>
</tr>
<tr>
<td>1113 ‘Know your rights’ campaigns targeting women and marginalized groups developed and conducted</td>
<td>1231 National and local public integrity assessments and related campaigns conducted</td>
<td>1213 Advocacy materials created for targeting regional bodies (including OAS, AU, etc.), based on newly generated knowledge (outputs 1111, 1131, 1221, 1231)</td>
<td>1222 Advocacy materials created to sensitize regional bodies for deeper commitment on gender equality (outputs 1111 and 1122)</td>
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<tr>
<td>1114 Develop and conduct ‘Know your rights’ campaigns informing citizens, including women and marginalized groups, about their rights, through calls for action, dissemination of knowledge through materials on media channels, capacity building with CSOs coalitions and public gatherings.</td>
<td>1232 National and local public integrity assessments and related campaigns conducted</td>
<td>1221 Reach out to, target, and participate in gatherings of regional institutions (OAS, AU, etc.), based on evidence created through outputs 1111, 1131, 1221, 1231, 1221</td>
<td>1222 Reach out, organize, participate in regional gatherings on women’s rights and equality</td>
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<tr>
<td>1115 Develop and implement partnerships with other organizations (networks), including women organizations focusing on capacity building.</td>
<td>1223 National and local public integrity assessments and related campaigns conducted</td>
<td>1311 Undertake/publish Business Integrity Country Assessments (BICA) on anti-corruption operating environment for business conducted and published</td>
<td>1312 Standards and initiatives to strengthen business environment developed and promoted through training and other knowledge platforms</td>
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</tr>
<tr>
<td>1116 Set up mechanism, including a strategy and tools to develop and sustain a supporter’s base for TI Chapters (trainings, campaigns, appeals, conferences)</td>
<td>1233 National and local public integrity assessments and related campaigns conducted</td>
<td>1312 Develop/promote anti-corruption standards and initiatives by business groups and associations (including integrity packs)</td>
<td></td>
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</table>

** Ultimatum for activities:**

- 1200 Increased gender sensitive anti-corruption policy and practice by local, national and regional public institutions, including on security.
- 1210 Increased knowledge on citizen experience, including women and marginalized groups, with a focus on corruption, including issues faced by women and marginalized groups.
- 1220 Increased commitment to integrity, accountability and transparency by regional actors, including around security and with consideration of women’s rights and equality.
- 1300 Increased commitment to transparency, accountability and integrity in business practice.
The Programme was structured around three overarching intermediate outcomes (see Logic Model on previous page). These and the expected results are described broadly, with the result expected at ultimate impact level defined as ‘Increased transparency, accountability and integrity at all levels and across all sectors of society’. This conceptual framework allowed the Grant to be applied to a very wide range of activities, as can be seen from the entries in the Logic Model, numbered as 1111 – 1321.

The MTR observed that the IMPACT Grant resembles ‘a collection of 12 domestic projects, with only one evident common thread, the Advocacy and Legal Advice Centres, common to all participating National Chapters, except Mozambique’\(^{18}\). This is the reality of TI and the programme management needs to respond to those challenges. National Chapters plan and direct their work according to differing local priorities and over different strategic periods. Some have strategies echoing those published globally by TI. Others do not. Thus, many National Chapters have not planned to use the Grant to work with the private sector (Intermediate Outcome 1300). Few chose to adopt business-related objectives. Similarly, it was possible for one National Chapter to choose not to have an ALAC\(^{19}\). Differing approaches were taken towards marginalised and vulnerable groups, notably women, and especially in the first 3 years of the Grant. Moreover, the National Chapters vary in their dependence on the Grant to finance core activity – and in their use of other support channelled through the Secretariat. Such diversity accords with TI’s nature. It appears compatible with the concept of the Grant.

The diversity of the National Chapters with differing needs, priorities and maturities, meant that the Grant was required to provide a wide scope if it was to fulfil its stated intention to boost National Chapter capacity\(^{20}\). Such breadth of scope is also a source of flexibility, allowing the Grant to respond to changes in local tactics and priorities - as corruption adapts to countermeasures, demanding changes in local approaches. These characteristics of breadth of scope and flexibility of application are appreciated by the National Chapters we spoke to. They meant that, to some degree, IMPACT was able to supply a similar function to the ‘core funding’ provided by the GAC in previous iterations of funding.

However, the breadth of scope necessary for IMPACT to achieve its purpose hinders specific and meaningful statements about the nature and direction of anti-corruption activities funded or part-

\(^{18}\) Ibid, page 25.
\(^{19}\) The Peruvian chapter never had a ALAC although for a period it had a legal office financed by other funds.
\(^{20}\) IMPACT does not have a full narrative formulation document where this is clearly stated, the acknowledgement of this objective was found throughout our interviews with donor and TI-S staff as well as in IMPACT application form to DFTAD (now GAC), page 20.
funded by the Grant. A further consequence is that results of expenditure under IMPACT are difficult to visualise or predict with much precision. Whilst this need not be seen as a problem it means that it is not easy to identify unintended outcomes of IMPACT or to direct activities in the proactive manner typically associated with Programme management. For example, in relation to the Grant’s third area of approach (1300: business), TI-S and the donor plainly felt obliged to set for the Programme results a low number of outputs and outcomes compared to the other two areas of approach. These low targets were not fully met – and depended ultimately on performance results from even fewer of the National Chapters than had agreed to work in this area.\footnote{For Outcome 1300, Mozambique, Trinidad and Tobago, Honduras, Nigeria and Colombia (to a certain degree) were targeted according to the PMF. Only Honduras and Colombia had results.} Weak progress in Area 3 was criticised during the Grant’s MTR but TI-S is not placed to tell National Chapters what to do.

2.2. Findings on Relevance, Efficiency and Effectiveness, Impact and Sustainability

Our main findings are analysed in terms of five evaluation criteria: relevance, efficiency and effectiveness (taken together), impact, and sustainability. A gender lens is applied throughout.

Relevance

The IMPACT Grant was generally well-aligned with global TI priorities on people and partners; prevention, enforcement and justice; and strong movement. This can readily be seen in the Figure on the next page. The IMPACT grant’s intermediate outcome objectives and activities are directly related to TI’s actions and expected change across its entire movement.
### Figure 6: Relevance of IMPACT in Relation to TI’s Global Priorities

<table>
<thead>
<tr>
<th>Priorities</th>
<th>Expected Change</th>
<th>TI-S Action</th>
<th>Select IMPACT Grant Contributions</th>
</tr>
</thead>
<tbody>
<tr>
<td>People and Partners</td>
<td>1. People around the world denounce corruption and take increased action to confront it, by demanding transparency, accountability and integrity</td>
<td>1. TI-S will support the creation of safe mechanisms for victims and witnesses of corruption to denounce corruption and seek redress (i.e. ALACs)</td>
<td>1100: Empowered people, groups and communities (including women and marginalized groups) demonstrating that corruption can be challenged effectively</td>
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<tr>
<td></td>
<td>2. A growing number of key partners and leaders drive anti-corruption efforts</td>
<td>2. TI-S will support chapters’ efforts to create public demand for accountability</td>
<td>- Create/strengthen ALACs; outreach activities with students, women and vulnerable groups; partnerships with associations (i.e. universities, media, community groups)</td>
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<td></td>
<td>3. Greater freedom of action and voice for anti-corruption activists</td>
<td>3. TI-S will lead in the promotion of civil society space for anti-corruption activists</td>
<td></td>
</tr>
<tr>
<td>Prevention, Enforcement and Justice</td>
<td>1. Public and private institutions implement the highest transparency, accountability and integrity standards to prevent and confront corruption</td>
<td>1. TI-S will lead a TI movement-wide initiative in the area of Money in Politics</td>
<td>1200: Improved and gender sensitive anti-corruption policy and practice by local, national and regional public institutions, including on security</td>
</tr>
<tr>
<td></td>
<td>2. The corrupt are increasingly being held to account and punished</td>
<td>2. TI-S will set global standards for business integrity, with special focus on the banking sector.</td>
<td>- Regional / national / local integrity assessments and advocacy campaigns; security and justice research and campaigns</td>
</tr>
<tr>
<td>Strong Movement</td>
<td>1. An increased body of knowledge of the interventions to stop corruption is readily available, focusing on what has worked and enabling the sharing of expertise</td>
<td>3. TI-S will lead the TI movement in a global effort to end impunity for Grand Corruption.</td>
<td>1300: Increased commitment to transparency, accountability and integrity in business practice</td>
</tr>
<tr>
<td></td>
<td>2. The Transparency International movement is professional, sustainable and leads by example.</td>
<td></td>
<td>- Develop/promote anti-corruption standards and initiatives in private sector; Business Integrity Country Assessments (BICA)</td>
</tr>
<tr>
<td></td>
<td>3. Transparency International serves as the point of reference on corruption issues in key countries (G20, BRICs &amp; MINTs)</td>
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</table>

The IMPACT grant was also aligned with TI’s global impact approach, which provides a lens to look at its achievements and systematise them. The Grant attempted to measure behaviour, and policy and institutional change through its outreach and awareness work across the three expected intermediated outcomes.

**Figure 7: Relevance of IMPACT in Relation to TI’s Global Impact Approach**

IMPACT was further aligned with the anti-corruption priorities and country focuses adopted by GAC. Combating corruption is considered critical to good governance and is a top development priority, retained in the GAC’s 2020-2021 strategic plan. The gender theme is also prominent across GAC’s development priorities.

We found that donors are generally well disposed to TI and its strategic agenda. We also found that TI-S actively seeks to sensitise itself to the developing policies of potential donors and to engage effectively with them.

‘TI is unique and extremely valuable. If they did not exist, we would have to invent them.’
- Donor

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22 For example The GAC Department Plan 2020-2021 pledges it to ‘build on the Justice for Victims of Corrupt Foreign Officials Act to support victims of human rights violations including by developing a framework to transfer seized assets from those who commit grave human rights abuses to their victims, with appropriate judicial oversight.’
Though the IMPACT Grant has a single donor, TI received core funding from the EU over the period of the Grant and from other bilateral donors, such as the UK and Switzerland. The EU-funded ACTION Grant (6.8m euros) had a similar timeframe to IMPACT\textsuperscript{23}. TI-S sought to synergise the two within the general context of regional and national support as well as concrete activities, such as ALAC Salesforce database development and roll-out\textsuperscript{24}. A good example is the launch of the Global Corruption Barometer (GCB) for Latin America and the Caribbean (LAC) countries in Guatemala in September 2019 where IMPACT financed most of the launch, and the ACTION Grant financed travel and accommodation for non-IMPACT Chapters of the LAC region to attend\textsuperscript{25}.

A further synergetic EU-funded project, led by UNODC, was CRIMJUST\textsuperscript{26}. The first phase comprised national assessments of the integrity, accountability and transparency of criminal justice institutions. Ghana, Nigeria, Colombia, Panama, Dominican Republic were directly engaged in this and IMPACT supported Guatemala, Honduras, Venezuela and Peru to do the assessment of criminal justice institutions in their countries as well. There are signs of synergy too with Eurosocial, one of the largest EC-funded social Programmes in Latin America, which has echoed a Chapter study on gender discrimination.\textsuperscript{27} Some synergy was also found with the Global Anti-Corruption Consortium (GACC) and its focus on investigative journalism and grand corruption.\textsuperscript{28} Here IMPACT financed a legal liability insurance for TI Guatemala and supported Argentina and Venezuela to participate in a GACC workshop about corrupt money flows in Berlin in October 2019.

The ability of the Grant to synergise effectively with a wide range of other projects results mainly from the breadth and flexibility of its design as well as its implementation by the civil society organisation in the centre of most anti-corruption activity globally. These are highly positive features.

Turning to alignment between IMPACT’s aims and those of the National Chapters, affiliation as a National Chapter does not guarantee close alignment with all TI’s global strategic priorities - nor therefore alignment with the totality of the IMPACT agenda. Alignment is not necessarily a two-way

\begin{footnotesize}
\textsuperscript{23} Implemented from January 2016 – December 2020
\textsuperscript{24} TI-S is supporting ALACs to adopt two digital tools: a secure online reporting tool (GlobaLeaks); and an online case management system and database platform (built on a Salesforce CRM platform) to manage corruption cases safely and efficiently, and to improve TI’s ability to analyse corruption trends and insights using ALAC data.
\textsuperscript{27}https://europa.eu/capacity4dev/mujer-y-corrupci-n-los-impactos-diferenciados-de-la-corrupci-n-en-am-rica-latina-y-el-caribe/documents/informe-de-transparencia-internacional-sobre-genero-y-anticorrupcion-en-america-latina-y
\end{footnotesize}
street. As we found in Activities, the Grant’s aim to work with Business finds an echo in TI’s high-level strategic priorities\(^{29}\) but finds little resonance in the work and aspirations of many local Chapters.

We saw no evidence of a specific needs assessment exercise or broader inception report setting out an implementation approach based on advance local consultation. The IMPACT Grant proposal, its Logic Model and results framework appear to have been developed using a top-down approach. However, the risks such an approach entails in terms of lack of ownership and relevance were reduced because: (i) the Grant addresses recognised needs; (ii) IMPACT funds were used to boost National Chapter capacity and the delivery of strategic anti-corruption objectives; and (iii) National Chapters are well placed to understand the local context and anti-corruption needs. Most if not all local anti-corruption objectives fit readily under the broad terms of the IMPACT Grant stated outcomes.

Strengthening National Chapters was always an acknowledged and valid concern of the Grant\(^{30}\), but this is not sufficiently explicit at the intermediate or even immediate outcome levels of the results framework (see Logic Model).

However, setting up the Grant in a ‘top down’ manner, relying on established routes and assumptions may have diminished the potential of IMPACT. For example, initial discussions about scope for possible business activity could have helped generate new thinking, pinpointing and overcoming obstacles. They might also have helped to lay the foundations for a more dynamic relationship between TI-S and the National Chapters, plus a sharper focus on IMPACT. We also found that some National Chapters acknowledged the scope for the Grant to have played a bigger part in fostering collaboration and synergies between National Chapters and other organisations working in the anti-corruption space\(^{31}\). A more systematic inception period for the Grant, with broadly-based engagement of National Chapters, might have injected fresh ways of thinking and working - as well as the cash to make them happen. It could also have helped ensured that the monitoring and reporting system were better aligned with the capacities and interests of the Grant implementers – a lack of fit that caused difficulties for TI-S – and for this Evaluation Team -until the end.

Gender is a third area where greater consultation at country level could likely have delivered gains for the Grant. A robust gender mainstreaming approach begins with analysis of the main priorities and

\(^{29}\) See for example Strategy 2020 and Implementation Plan 2020.

\(^{30}\) See for example IMPACT application form to DFTAD, page 20.

\(^{31}\) For example Esclavitud Moderna (Venezuela), Caribe Afirmativo (Colombia) and Los Fiscalizadores (Guatemala).
needs of women in the target groups and seeks to adapt the intervention logic to it. In this regard, the cross-cutting theme of mainstreaming, highlighted by the donor, was not seriously pursued. The Grant effected some real change on engaging with women, but this could and should have started earlier and received greater investment in the form of specialised central support. The lack of a clear gender strategy from the outset has hobbled results-oriented work. Even at the end of the Grant, a fully appropriate and well supported strategy had not been pulled together to address the needs of women and to enlighten the work of the National Chapters.

Most of our informants praised the flexibility of the Grant, meaning the ability of participating National Chapters to choose very broadly which activities to implement as well as to receive funding for activities outside of their normal territorial scope. Essentially, the Grant is relevant to almost any anti-corruption effort, by groups or individuals.

It is difficult to assess the quality of the response of the Grant to the changing operational context. We could see, for example, that funds were transferred to cover security issues when they arose. However, the lack of clear and transparent criteria for allocations in the first 3 years of the Grant reduce our ability to judge how far such flexibility was applied consistent with agreed donor priorities. In addition, the Performance Measurement Framework (PMF) and associated indicators were set in 2016 and no opportunity was taken to refine these against changing realities of the Grant and operating contexts.

Our case studies highlighted the adaptability of National Chapters to concrete and changing needs at community level, as seen in the examples on the right.

IMPACT has a Logic Model and associated PMF, but not a Theory of Change (ToC). The Logic Model lacks detail concerning critical assumptions behind inputs, outputs, and

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32 See for example Gender mainstreaming: gender analysis or GAC’s guidance on the matter.
33 For example elaboration of the Latin America GCB to incorporate gender issues.
34 TI Guatemala and TI Venezuela received mini grants to enhance safety and security measures, as did the Nigerian National Chapter.
35 See Appendix 2, Case Studies on Colombia, Guatemala, and Nigeria.
outcomes. We found few signs that the Logic Model and the associated risk strategy had served as practical, active management documents. Nor did it seem that the PMF was regarded as relevant or particularly useful beyond the immediate bureaucratic reporting requirements to GAC.

The MTR commented on inconsistency between the Logic Model and PMF, on the one hand, and the founding explanatory document (or Theory of Change) regarding the identification of 'sustainable economic growth' as a Grant outcome. It is true that such an aim (if that is what it was) was not underpinned in the Logic Model. We did not find that this flaw had any discernible impact on Grant management. More serious was the disconnect we found between the indicators and how the Grant managers gauge success. This was most evident in relation to the stated high-level Grant outcome of positive movement in TI’s Corruption Perceptions Index (CPI).

The question of measurement remains a central dilemma for the Grant. It was a pity that more account was not taken of available internal wisdom on this topic both in designing and implementing the Grant. An important lesson is that TI and the donor should take greater account of the views of the National Chapters themselves. According to TI’s own sources, they should eschew measurement systems that aggregate unrelated results into single data points in favour of more diverse frameworks to track change at country level or in specific contexts that can be reported back to the donor more easily - and with greater fidelity to truth on the ground, or to the views of the National Chapters themselves.

'It is necessary to look for other indicators that are fairer to this type of work.'

'If we only use this index, we see just the perception of how corruption is seen. In our region, there are major advances and setbacks with this issue, depending on the social and political context. One year, a country scores very well on this index. The following year, it suffers a setback. There are other dynamics that need to be evaluated.'

‘Regarding the Transparency International matrix: it is complex and makes it difficult to measure impact.’

- Speakers at outcome harvesting workshop

Initial objectives set under the Grant appeared appropriate, though problems were encountered during the first 2 years in implementation and disbursement. These were reported on in the MTR and we do not repeat that analysis here other than to underline the suggestion of greater support to National

37 For example the TI Help Desk Note prepared by TI’s in-house researcher around the time the Grant was being launched.
38 Ibid.
39 IMPACT grant mid-term evaluation Final Report, page 41.
Chapters in assessing likely risks and managing them as well as general guidance and support in the planning stages of their proposals. The lesson is that a Chapter’s superior knowledge of local context and need does not confer management skills in assessing risk and in calibrating ambition accordingly.

The Grant objectives continue to be pertinent and are arguably of increasing relevance in several countries due to the shrinking space for political and social participation and significant setbacks in the anti-corruption field.

Impact

Ultimate Outcome

The results framework accompanies its definition of the desired ultimate outcome of the Programme with a target of a 1.5 points average score increase in CPI by 2020. A second-high level target looks for a 5% reduction in Nigerian and Ghanaian people perceiving that corruption has increased, with 3% reduction in remaining participating countries. The framework also aimed for a reduction in the number of people paying a bribe for public services (5% in Nigeria and Ghana; 2% elsewhere). Targets for ultimate impact in terms of women and other discriminated groups are unclear and without tools of assessment. For example, although the second indicator specifies disaggregation by gender, this is missing at both baseline and target levels.

We did not find that these targets, or the incomplete results declared against them, allowed us to reach firm conclusions whether the Grant ‘increased transparency, accountability and integrity at all levels and across all sectors of society’ i.e. if the ultimate outcome was achieved or not. The sources of data identified by the PMF are either unavailable or poorly suited for informing such judgements. In particular, the Corruption Perception Index, (CPI) is based on subjective responses which are slow to alter and which tend to lag behind change on the ground. Colombie is stagnating in the CPI, which does not reflect most of the positive developments of recent years. These are evident in advocacy with public institutions, processes put in place within institutions, new laws.... It is preferable to measure environments, instruments and processes in the fight against corruption.’

– National Chapter

40 For example, Guatemala and Venezuela.
41 ‘Increased transparency, accountability and integrity at all levels and across all sectors of society’.
42 See for example ‘Paul Heywood ‘The Corruption Perceptions Index (CPI): the Good, the Bad and the Ugly’ The British Academy, London 2016.
dimension of corruption, which comprises 2 of the 3 approach areas identified by the Grant. Moreover, the meaning of scores for the CPI’s aggregate indicators is difficult to interpret in policy-relevant terms.

The result is an ultimate outcome indicator which does not reflect the good work of National Chapters and partners on the ground. Seven of twelve countries targeted by IMPACT had CPI scores decrease from baseline (2015) to 2020. The average score across IMPACT beneficiary countries decreased by 1 point.

*Figure 8: CPI Score by IMPACT Country 2016 and 2020*

As TI’s own summary of academic opinion on corruption metrics\(^{43}\) points out, the CPI:

‘is unlikely to help us evaluate the effects of specific policies in a specific country,’

and that, one benefit of the CPI was to advance public understanding that:

‘complex, overarching concepts can rarely be measured directly by a single indicator’.

TI’s summary paper goes on to suggest that:

‘Data that has local policy relevance can be more strategically useful than composite indicators. [Though] potential for cross-country comparison is low, they are invaluable for measuring outcomes within a country [and can] facilitate benchmarking [and] more robust information about the local drivers of change’.

Interviews with local Chapters suggested strong support for such an approach. There are important lessons here for the future.

**Intermediate Outcomes**

Targets are more closely defined and informative of progress at the intermediate outcome level. We found some limitations with the 6 key indicators but the picture seems reasonably complete. Overall, looking at the results data in the light of our interviews and enquiries, we find a generally satisfactory performance, except in relation to business.

**Intermediate outcome 1100: Empowered people, groups and communities (including women and marginalized groups) demonstrating that corruption can be challenged effectively**

The IMPACT Grant performed satisfactorily in this area, with some strong intermediate results in challenging circumstances. We saw evidence of clear instances where community members - through ALACs - challenged corruption and paved the way to permanent legal and policy changes. There is evidence of the consolidation of strong social audit networks, some with a strong presence of women’s organisations and LGBTIQ+ groups with their own governance and presence throughout a country (for example, Colombia and Guatemala). However, high-level recorded perceptions in target countries regarding whether ordinary people can make a difference in the fight against corruption remained relatively the same, on average, over the course of the Grant. This discrepancy appears to reflect the variable availability of local GCB data and the choice of the high-level CPI indicator, which has a relatively narrow scope and tends to lag behind change on the ground.

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44 For example 1100 B.1 (‘% percentage of people expressing the will to fight corruption, including disaggregated data (M/F)’ is not operational for Latin America as there was no baseline and the progress of this indicator in the region cannot be measured.
| Supporting Target | IMPACT has nine ‘case studies’/examples with results stemming from DRC, Ghana, Peru and Guatemala. Cases cover a wide variety of corruption including corporate tax avoidance and illegal arrest. Notably, TI-S decreased its achievements against this target from its Y5 Annual Report (29 cases). The rationale given is that the successes it now cites are more clearly attributable to ALAC activity and where sustained legal or policy changes can be better evidenced. |
| Supporting Target | It is unclear if IMPACT achieved this target as it was measurable only in certain years (last being Y4 2019) when the GCB was conducted. At the time, Latin America had a score of 77% and Sub-Saharan Africa 53% in response to the question ‘Can ordinary people make a difference in the fight against corruption?’ There is no baseline listed for Latin American countries so it is not possible to measure change quantitatively. The baseline for Sub-Saharan Africa was 53% and the score remains the same as for 2019. That said, we received solid and encouraging evidence of popular push back against mounting corruption in at least two of our case studies (Nigeria and Guatemala) despite and perhaps partly due to a worsening overall corruption environment. |
| Impact on Women / Marginalised Groups | Disaggregated data is rare, except at the immediate outcomes and output level, where the indicators are weak. Two key indicators (1100.A1 and B1) are not gender disaggregated (though we noted that at least one of the reported cases in Nigeria relates directly to domestic violence). National Chapters report increased efforts to adapt their strategies and integrate a gender perspective in the latter part of the Grant. We saw evidence of an increase in women's participation in outreach and know your rights campaigns (in year 5, 62% of the participants were female). On the other hand the number of complaints made by women to ALACs has increased little over the Programme. Evidence from interviews and documentary analysis shows formation of strategic alliances and support to women's associations (some working with indigenous women,\textsuperscript{45} and other marginalised groups such as \textsuperscript{45}For example ‘Alas de Mariposa’ in Guatemala. |
LGBTIQC+ people.\textsuperscript{46} We found improvements in policy and practices in terms of understanding their impact on women, but no strong and clear results are available. Several Chapters explained lack of progress as absence of gender-specific policies, which raises a concern because gender mainstreaming is cross-cutting and applicable to all situations and policies (irrespective of whether 'women' is a specified project focus). This typifies a lack of capacity and understanding encountered quite generally regarding what 'gender mainstreaming' means or how to apply it. This underlines the need for support to National Chapters from a gender specialist, as recommended in the MTR. Overall, we found that, especially since the MTR, IMPACT has become a key agent in raising awareness of the need to integrate and mainstream gender, with most National Chapters reporting new lines of work and new funding opportunities. These are positive developments but not measurable with the tools available. Impacts on the ground are likely to be seen only in the longer term.

Also, IMPACT grouped together 'improved' and 'gender sensitive' in relation to anti-corruption policies and practices. The Grant did not perform well measured against this as significant anti-corruption gains did not necessarily meet gender sensitive approaches. TI should be careful in combining outcome objectives in this way.

\textsuperscript{46} For example ‘Caribe Afirmativo’ in Colombia.
Intermediate Outcome 1200: Improved and gender sensitive anti-corruption policy and practice by local, national and regional public institutions, including on security

The IMPACT Grant performed well in this area, with substantial evidence of improved anti-corruption policy and practice at the local, national and regional levels. Evidence on gender-specific or gender-sensitive outcomes is thinner. Attribution specifically to IMPACT is often unclear because of the presence of other funding streams or because of partnerships with other organisations. Yet, given IMPACT represented a significant amount of core funding for most National Chapters, it is fair to consider the IMPACT Grant overall as important if not invariably instrumental.

Table 2: Intermediate Outcome1200: Results by Indicator

| Supporting Target | Supporting Target
|-------------------|-------------------|
| 10 instances of laws and policies being enforced | There were forty-six mostly well-evidenced instances of laws and policies being enforced, out of a target of ten. Results stem from Argentina, Guatemala, Honduras, Jamaica, Nigeria, Colombia, Peru, Ghana, DRC, Mozambique, and Trinidad and Tobago. No results reported to the framework from Venezuela though we saw some evidence of progress on an anti-corruption agenda with a gender focus: the National Chapter has established a partnership with the Gender Subcommittee of the National Parliament to receive specific complaints of gender violence, sexual violence and sextortion. Apart from this, only two of the reported instances are focused on 'gender' (Argentina and Colombia). It could have been useful to provide criteria for 'enforced' as results indicate variations of interpretation. This may account at least in part for the exceeding of the target, or it was set too low.

| Supporting Target | Supporting Target
|-------------------|-------------------|
| 3 security and justice institutions implementing | Four security and justice institutions implemented transparency, accountability and integrity standards, exceeding the target of three. In Nigeria, the National Police established a successful complaints mechanism in partnership with the Chapter’s ALAC; the National Drug

*‘In Colombia, during the electoral period, we actively participated in and led a campaign requesting that all political candidates publish their declaration of assets, income and conflicts of interest. After strong advocacy work at the Civil Society level (to which IMPACT actively contributed), the Law 20/13 on transparency in public services was passed in 2019, and this is now mandatory’* – National Chapter
<table>
<thead>
<tr>
<th>transparency, accountability and integrity standards</th>
<th>Law Enforcement Agency updated its website; and the Federal High Court increased compliance with the Freedom of Information 2011 Act. In Colombia, the Higher Council of Judiciary includes some of the CRIMJUST report recommendations in reform of standards. No evident gender contribution within the scope of the indicator though we found some interesting results in the Colombia case study where they made recommendations for the 2018 incoming government’s Development Plan with 22 recommendations adopted, 5 associated with public procurement, 15 on anti-corruption and 2 on decentralisation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Supporting Target</td>
<td>One regional body adopted recommended policies and the result appears impactful: 'In April 2018 the Latin American and Caribbean Chapters developed an advocacy campaign targeting the Organization of American States (OAS). The Chapters met to prepare their demands to the OAS and organised parallel meetings during the Summit of Heads of State. The summit had an anticorruption theme and the final declaration contained 65% of the recommendations submitted by TI National Chapters, (11 of 17 recommendations to the heads of state).</td>
</tr>
<tr>
<td>At least 2 regional bodies adopt recommended policies</td>
<td>IMPACT far exceeded this target, training 2,215 civil servants throughout the Grant, out of a target of 250. Trainings took place with civil servants from Mozambique, Argentina, Colombia, Guatemala, Honduras, Venezuela, Nigeria, DRC, and Jamaica. No results from Ghana, Trinidad and Tobago and Peru, though all Chapters were targeted. In Mozambique, teachers were trained on attitudes and behaviours on gender issues, sexual and reproductive rights, ethical principles and non-sexist education, of which 61 are already doing the replication in 32 schools (training of trainers). Trainings were conducted with public servants of all the entities evaluated in the Bogota Transparency Index. The training was focused on the topic of accountability and human talent. The government counterparts interviewed expressed a high level of satisfaction with the trainings and suggested that they were instrumental in the creation / updating of transparency policies in Bogota. It is unclear, however, to the Evaluation Team whether or not the trainings conducted in other countries had a sustained impact on the civil servants who participated.</td>
</tr>
<tr>
<td>Supporting Target</td>
<td>250 civil servants (M/F) trained</td>
</tr>
<tr>
<td>Supporting Target</td>
<td>7 organisations now have complaints mechanisms or referral systems in place, exceeding the target. Results stem from Colombia, Argentina, Ghana, Honduras and Mozambique. E.g. in Honduras the Education Secretary set up a referral system and in Argentina the Municipality of Tigre opened up an ALAC. In Nigeria, the National Chapter successfully supported legislation and implementation of a police complaints mechanism.</td>
</tr>
<tr>
<td>Supporting Target</td>
<td>IMPACT exceeded its target. Four organisations implemented 'codes of conduct', us of a target of three. Results come from Argentina, Mozambique and Honduras. In Mozambique the national organisation of teachers approved a code of conduct; and in Honduras the Declaration on Ethics and Transparency Framework was signed by officials of the Ministry of Health.</td>
</tr>
</tbody>
</table>

**Intermediate Outcome 1300: Increased commitment to transparency, accountability and integrity in business**

Unsatisfactory. IMPACT states it met or exceeded two of three indicators. However, results are concentrated in two countries: Honduras and Colombia; whereas results were also expected in Mozambique, Nigeria and Trinidad and Tobago (no achievements were evident to us). Furthermore, key achievement terms such as 'improved' and 'implemented' lack definition and hence produce somewhat vague results. Business related achievements were not seen as key during our Outcome Harvesting Workshops. Some progress was reported by Colombia, but this seemed mainly associated with monitoring implementation of the peace agreements, where actions included business as one of 3 areas of work. In 2019, a measurement was carried out with companies in the extractive sector, in corruption risk management. Disappointingly, the Nigerian case study found little in this locally crucial area of business corruption.
### Supporting Target

1. **public registry for companies available to law enforcement authorities and the public by 2020**

| IMPACT achieved its target insofar as Honduras has a public registry for companies, Empresas Abiertas, launched in 2018 in cooperation with the media company Revistazo. The site, although still in Beta form (data has not been updated), provides publicly available information on over 211K businesses. This could prove useful to, for example, law enforcement and related government bodies (i.e., open ownership for equal opportunity procurement). We found the site easy to navigate and a good summary of information on businesses. Oddly, the Honduras National Chapter did not mention this site as an achievement during the Outcome Harvesting Workshop. |

### Supporting Target

2. **At least 20 companies per year improve standards and practices changes in 2019 and 2020**

| Seven businesses out of a target of twenty per year in 2019 and 2020 (40 total) have improved standards and practices. The seven companies come from the extractive sector which 'began to implement the recommendations' contained in a study conducted by the grant. Achievements against this indicator were decreased from the Y5 Annual Report (33 businesses) to now (7 claimed, on stricter criteria). All results come from Colombia (not an original target country); none from Mozambique, Honduras, Nigeria, and Trinidad and Tobago. Colombia mentioned this as an achievement during the Outcome Harvesting Workshop, indicating that the participants valued their work; but we were also told there is little evidence to suggest businesses have sustained 'improved' practices. |

### Supporting Target

3. **30 companies implementing integrity Standards**

| IMPACT exceeded its target. Eighty-one companies out of a target of thirty companies implemented 'integrity standards' (i.e., capacity building, whistle-blower mechanism, complaints mechanism). However, all 81 companies come from Honduras; none from Mozambique, Nigeria, Colombia or Trinidad and Tobago. Honduras did not mention this as a key achievement during the outcome harvesting workshop with Latin American National Chapters – suggesting that this achievement was not rated highly by the participants. |
Other Results

At the outcome level, we found that progress on strategic litigation is not well captured by the IMPACT results measurement framework and in suboptimal alignment with the indicator to which it is most closely connected (1112). Yet this is regarded as a highly relevant approach by some National Chapters and has yielded some very important results, raising social awareness on corruption and changing public policies and procedures.47

Another result area not well captured in the Grant’s PMF is the generation of gender and anti-corruption knowledge and alliances. Although these results are more at the level of outputs (rather than outcomes or impact), this evaluation realised that the tool’s design errors and, its lack of updating, have left some interesting results off the radar. Thus, IMPACT allowed strategic alliances with women’s organizations such as UN Women at regional level (connected to the publication of the 2019 GCB incorporating gender issues) and so national level alliances such as the ones with ‘Red Naranja y Esclavitud Moderna’ in Venezuela, which enabled activities on gender issues such as internal trainings and elaboration of a study on how corruption has facilitated human trafficking in the context of organized crime and migration. The Guatemalan Chapter allied with ‘Alas de Mariposa’ with whom they filed joint complaints in cases of serious gender discrimination. – a good example of an efficient way to take forward management of gender dynamics.

In addition, several reports have been produced with very relevant aspects for gender equality within IMPACT:

- The Latin American and Caribbean Barometer including for the first-time questions on sexual extortion. Ti-S members have also informed us that this was the trigger for GCBs in Europe and Asia to start including these questions as well.
- A report on sexual extortion studying the links between power, sex and corruption.48
- A report on political participation and corruption.49

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47 See Guatemala case study at Appendix 2 for concrete examples.
49 Unfortunately not currently available online.
• Mapping of good practices in gender and anti-corruption in Latin America\textsuperscript{50}.

Sustainability

Further financing from GAC has not yet been secured and we gathered it is unlikely to be forthcoming for an extension of IMPACT as such. However, TI staff confirmed that an application was under discussion for a broadly-based Programme focusing on Sub-Saharan Africa and with a strong gender theme.

We could not find an exit strategy for the Grant as such, only a connected thread of broader narratives for example in the Year 5 mid-term report and in the no-cost extension. Nevertheless, sustainability of gains made during the Grant is plainly of active concern to all stakeholders (and to the National Chapters themselves) and a matter for continuing attention within TI. The nature of anti-corruption work means that it is difficult to find suitable private and public sponsors in some countries. Thus, it is understandable that sustainability for TI will often translate into a search for renewed commitments from international donors, especially in the form of core funding.

Some individual Chapters such as Guatemala and Trinidad and Tobago appear to be still quite heavily dependent upon the Impact Grant. However, dependence has decreased in most cases over time:

\begin{table}[h]
\centering
\begin{tabular}{|c|c|c|c|c|}
\hline
EUR & \% of IMPACT on the National Chapter’s budget & \% of IMPACT on the National Chapter’s budget & \% of IMPACT on the National Chapter’s budget & \% of IMPACT on the National Chapter’s budget \\
\hline
Argentina & 31.7\% & 26.1\% & 31.7\% & 19.7\% \\
Colombia & 7.5\% & 14.3\% & 12.6\% & 3.6\% \\
DRC & & & & \\
Ghana & 13.7\% & 40.1\% & 10.8\% & 5.5\% \\
Guatemala & 37.5\% & 33.7\% & 18.7\% & 8.9\% \\
\hline
\end{tabular}
\caption{\% Share of Impact Funds in the Annual Budget of National Chapters\textsuperscript{51}}
\end{table}

\textsuperscript{50} Género y anticorrupción en América Latina y el Caribe - Transparencia por Colombia (transparenciacolombia.org.co).

\textsuperscript{51} The data in this table are purely indicative as the impact budget is calculated from April to March and the National Chapter budget from January to December. Some data are missing because Nigeria became a National Chapter in Formation (part of the accreditation process) in 2018, so there is no information for 2016 and 2015; DRC is a National Contact, and not required to submit information in this form. Also, Venezuela is a hyperinflationary economy, so the data are not entirely reliable.
IMPACT had a specific outcome directed towards sustainability and reducing donor dependency. At the time of the MTR fewer than half of the participating Chapters had committed to specific diversification of funding, despite the Grant’s aim. We were unable to find further reported results for this outcome, though we heard from our Case Studies that there have been some discussions about sales of services and materials and different types of donors (for example, foundations). We gather that the departure of the fundraising specialist at TI-S who might have supported work on this output may account for the lack of progress, plus other even greater fund-raising priorities.

We noted that the MTR canvassed proposals for seeking funding in other related thematic areas (for example, education, health, climate change). The MTR also underlined the need to support work on the business model for individual Chapters and to diversify funding sources, especially those with a weaker funding base. We found little evidence that these ideas had been taken forward.

The Grant has been used mainly to boost existing activities. However, where it has financed development of good practice and successes, for example, ALACs, or gender mainstreaming, these appear to have become adopted as core and continuing business for the National Chapters we spoke to. For example, the Argentinian National Chapter has secured 3 different projects on gender and corruption: a regional one funded by the EU, a national one with UK funds and another one on the implementation of the gender approach in Open Government action plans, assisted by TI-S. New projects on gender and corruption are also being developed at the national level in Guatemala. Nigeria has a new funding opportunity regarding sextortion with GIZ. The Colombian National Chapter (whose ALAC was created thanks to IMPACT) is including ALAC components in several projects with different donors (USAID project together for transparency with DAI and national forum for Colombia, PARES organisation, FUNSICAR in Cartagena) ensuring their continuity. This strategy has been repeated in

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52 Outcome 1123.
53 Jamaica, Trinidad and Tobago, Peru, Guatemala.
54 Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH.
other National Chapters such as Colombia, Argentina, Nigeria the DRC and Guatemala who report that they have also started to incorporate ALAC components in different projects, so that ALACs receive funding from different donors. In DRC, the have included the ALAC component to a Project funded by the Belgian cooperation related to the mining sector, a project in climate change funded by the French cooperation, and their strategy is to incorporate a complaint mechanism throughout all their projects. These are encouraging developments that will help sustainability.

Survival and sustainability go hand in hand with a strong learning agenda, such that the organisation avoids making the same mistake twice and builds on success. Overall, we did not see evidence of a strong learning agenda. We noted encouraging work on learning and best practice through the ALAC Coordinator, and through regional coordinators and regional meetings. But the monitoring mechanisms necessary to establish a strong learning agenda have not been put in place. Furthermore, discontinuities in personnel during the life of the Grant (mostly at TI-S level) have unfortunately hampered additional work of this kind.

A Risk Management Plan exists at global level\(^5\). It was updated in Years 3 and 5 of the Grant. We understand that the Plan was drawn up in consultation with National Chapters and regional advisors at the start of the Grant, but we did not find that the document was being used as an active management tool to reflect on and improve the Grant. Its tendency towards general and generic risks limited its use at country level. No National Chapter member we asked seemed to know much about it.

**Effectiveness and Efficiency**

Our ToR asked us to look at effectiveness and efficiency through the lens of the MTR, reviewing in particular, how were recommendations from that review processed and implemented.

Overall, good progress was made on effectiveness related recommendations, such as fostering relationships and networking amongst National Chapters. Some good work was also done to implement impact-related recommendations (for example, use of investigative journalism to support ALACs). The Programme performed less strongly on remaining elements. Despite efforts on ‘gender mainstreaming’, the recommended investment in a gender specialist was not made despite evidence of a serious gap. Similarly, investment in ALAC support at TI-S level fell somewhat short of what was recommended.

\(^5\) Programme and Initiative Risk Register date assessed: July 2016).
<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Findings</th>
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<tbody>
<tr>
<td>Stop growing and consolidate</td>
<td>TI-S made efforts to consolidate and focus on agreed outcomes (for example, an ALAC coordinator was hired with a specific focus to achieve ALAC related results). Nor did TI-S lead the Grant to expand into new thematic areas. However, TI-S’s ability to require or restrict specific development is limited. Moreover, consistent with the design of the Grant, IMPACT funding of for example, National Chapter salaries may have been used for activities unrelated to the 'low hanging fruit' recommended by the MTR. Furthermore, National Chapters need to adapt to the circumstances on the ground and cannot necessarily be bound by rigid outcomes drafted in 2016. Regarding 'low hanging fruit' it is relevant that ALACs existed in most of the National Chapters prior the IMPACT Grant and are at the core of National Chapter work.</td>
</tr>
<tr>
<td>Assess possibility of creating ALAC steering committee or other mechanisms of support readiness</td>
<td>There is no global steering committee as such, but an ALAC Coordinator was brought on board (January 2019) and is working to coordinate ALAC activities, including research and results (a researcher was also engaged for a short period). We found that the model of networking and consultation of all the ALACs (a steering-community model) was plausible but that initial fears of bureaucratic burdens had deterred TI-S from pushing for more steering committees at the national level, where two National Chapters have steering committees (Ghana and Nigeria). Given that this is now accepted as a good practice more should have been done to promote it. In the LAC region, National Chapters have set-up a regional ALAC coordination. Members of Steering Committees we interviewed appeared to have a fair grasp of their roles and responsibilities and found their participation valuable. There is a continuing gap at TI-S level to support national strategic casework.</td>
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<tr>
<td>Use investigative journalism to support ALAC work, where relevant</td>
<td>National Chapters appear to have engaged actively with investigative journalists and more broadly with the media; and TI-S has encouraged such activity, for example, TI-S hosted a 'long exchange' with Guatemala on investigative journalism and promoted ‘Los Fiscalizadores’ a journalistic project aiming to tell the story of the citizen collectives that exist in Guatemala to audit and oversee the lack of transparency in their communities; the National Chapter in Honduras, worked intensively with journalists during the emergency phase of the response to the Covid 19 pandemic on a mobile hospital scandal, denouncing an outflow</td>
</tr>
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</table>
of more than 50 million dollars. The same Chapter also launched the ‘Faces of Corruption’ portal[^56], which provides information on different corruption cases in one place and in an interactive way, showing in a visual display the impact that corruption has had on the country. Such engagement appears to have been considered useful though it is difficult to assess its value overall except in terms of its ultimate goal to increase success of ALAC work.

| Improve one single monitoring instrument to consistently show progress achieved in an overview manner | The IMPACT Grant has made some good progress against this recommendation. The project team (2019 onwards) worked hard to consolidate data and communicate it in a more user-friendly format in Mid-Year and Annual Reports. GAC appreciated its efforts. Yet well evidenced and targeted data remains a reporting challenge for National Chapters and thus for TI-S, despite deployment of innovative recorded ‘harvesting’ interview sessions. Despite best efforts the PMF did not show itself to be a useful management tool, genuinely helping TI and its National Chapters to deliver a quality Programme. Beyond the Grant it could make sense to have semi-annual Results Workshops with National Chapters to review Grant monitoring, discuss challenges, find solutions and maximise alignment on ways of working. Some National Chapters told us that they would have appreciated the opportunity to consolidate results before the end of the Programme and this could have provided a good opportunity for that. Accountability mechanisms could be considered (for example payment is deferred until quality data is signed off by TI-S) but we found that the problem for most Chapters was capacity rather than motivation. More broadly, this Evaluation calls into question the value of consolidation of data at Programme level. As mentioned under ‘relevance’, TI-S and its donors could sensibly consider alternatives, for example, a more ‘bottom-up' approach to ensure data is relevant to each context.

| Re-structure annual report on results per outcome instead of a compilation of narrative/images | GAC stakeholders interviewed found the report structure (Annual and Mid-Year) to be clearer and more user-friendly. They appreciated the evident shift from snippets of inherently appealing National Chapter activities to an improved focus on desired outcomes - and National Chapter contributions to that. Chapters had mixed views, but some commented that report templates had improved allowing to better capture their results.

[^56]: http://rostrosdelacorrupcion.revistazo.com/
| of each chapter report | Neither Caribbean member applied for funding for 'long exchanges' Networking between Jamaica and Trinidad and Tobago appears to have been developed post-MTR. It was evident that the Chapters were familiar with each other's work and shared lessons / best practices. IMPACT funded these exchanges partly through TI-S call for 'long exchanges'. Beyond ALACs, topics included 'dirty money', 'gender', and 'SDGs'. Colombia, Argentina, Ghana, Guatemala, and Nigeria benefited from these exercises. IMPACT-participating countries did not apply. IMPACT Chapters could exchange with a non-IMPACT Chapter (Kenya, South Africa, Mexico, and Morocco) to learn from them. |
| Support the establishment of a network among existing and potential Chapters in the Caribbean | See also the general account given in the first entry (cell H5) above. Specifically, TI-S did not find itself in a position to identify and harvest low-hanging fruits except in relation to initiatives regarding the ALACs. Nor there is evidence of appreciable consequent impact on Programme performance. Regarding struggling National Chapters, Mozambique left the Grant (though for a complex of reasons), and difficulties appear to remain with for example, DRC. Yet it is unclear to us that full implementation of the MTR recommendations would necessarily have delivered better outcomes in either case. We heard that difficulties with the National Chapter in DRC were not because of their work at national level but project management related, for example, responsiveness, submission of reports and information, general communication flow etc. |
| Boost execution of ‘low hanging fruits’ in Chapters falling behind | Yes, networking between Jamaica and Trinidad and Tobago appears to have been developed post-MTR. It was evident that the Chapters were familiar with each other's work and shared lessons / best practices. |
| Provision of more substantive support to Chapters in execution of activities | Yes, stories of success were published at the national level\(^{(57)}\) (i.e. ALACs – which go beyond IMPACT funding). The ALAC Coordinator also shared with us a |
| Prepare postcards that | |

<table>
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<tr>
<th><strong>Illustrate successful stories of impact achieved with this Grant</strong></th>
<th>Developing compendium of ALAC impact cases that will be categorised and analysed for use in national, regional and global advocacy activities and reporting. This will also be used for supporting advocacy, for example, publishing key stories in online blog and postcard formats (we could not judge the effectiveness of the selection or distribution arrangements).</th>
</tr>
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<tr>
<td><strong>In Y4, roll back and guarantee partner takeover, where relevant</strong></td>
<td>We found little evidence of significant work from Chapters (or from TI-S in assisting them) to monitor the capacity of beneficiaries and partners to carry on after the Grant ends, as the MTR recommended. We noticed that GAC expressed particular interest in response to this MTR recommendation.</td>
</tr>
<tr>
<td><strong>Have a gender and corruption specialist available to support Chapters</strong></td>
<td>The Grant has undoubtedly contributed to increasing understanding and action on the need to promote gender equality among stakeholders. However, more could and should have been done to integrate mainstreaming. Work on the topic was slow to start and the opportunity to bring in a gender specialist was not taken. However, some valuable gender related support was provided through the training and subsequent report ‘Gender and anti-corruption in LAC: good practices and opportunities’ (focused on Latin America, not the Caribbean and SSA). A gender expert could have been expected to have made use of GAC’s Feminist International Assistance Gender Equality Toolkit for Projects, or other available tools to ensure gender mainstreaming. For instance, assessing the DAC gender equality policy marker or the GAC’s Gender Equality coding framework, developing a Gender Analysis document and a Gender Equality strategy, identifying the financial allocation for gender equality-related activities, boosting monitoring and reporting on gender equality. The expert could also have operated as a kind of helpdesk to ground the gender approach in the National Chapters.</td>
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<tr>
<td><strong>Identify champion chapter (beyond IMPACT Chapters, if necessary)</strong></td>
<td>Guatemala, Ghana and Argentina were identified internally at the time of the MTR as potential Gender Champions. However, those Chapters did not have a leadership or full ‘champion’ role in sharing lessons learned and serving good practices providing a strategy to identify, replicate and strengthen good practice.</td>
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58 See comments in ‘KGSG’ column in the TI-S table summarising responses to the MTR.
necessary) on gender issues

There is progress at the regional level in Latin America, as previously mentioned, a mapping of good practices in gender and anti-corruption in Latin America was developed. The mapping relates only to Latin America and has only recently been published (so its results have not yet been analysed).

Provide more substantive support to Chapters in development of proposals, Programme planning and execution of activities

TI-S provided some support for activities, in particular on ALAC (through ALAC Coordinator who joined the Programme in 2019) and gender related activities (i.e. some training on how to apply a gender-sensitive approach, plus report on how to apply a gender-sensitive lens in L.A. and Caribbean). They also worked directly with National Chapters to support their periodic reporting. TI-S Management Response to this recommendation pledged ‘a research position will be hired’ but it remains unclear precisely what was envisaged. National Chapters continue to express a lack of capacity on gender mainstreaming and regarding a range of technical issues.

2.3. TI-S structure

IMPACT coincided with periods of significant restructuring within TI-S as well as discussions of a new movement strategy. The restructuring involved an unsuccessful experiment with a dead flat management structure, ‘holacracy’, occasioning significant confusions about role and responsibilities, restoration of a more hierarchical arrangements; several changes at top leadership level; and multiple redundancies and frequent staff moves. There were gaps in staffing and loss of expertise. Staff had to cover the duties of missing colleagues. We were told by several external observers as well as internal sources that this period of disruption is now past and that the most recent changes (finalised in 2020) have ushered in a period of clarity and stability. It is beyond our ToR to evaluate that claim but we record here that the management reorganisations experienced by TI-S throughout the implementation of this Grant have adversely impacted their ability to support the National Chapters to get the very best from the precious opportunities presented by the Grant.

Only two staff engage more closely with the Grant, which includes Chapters with different structures and levels of integration in the movement and differing mother tongues. Though regional advisors exist

'It was like “I'm Spartacus”, except that it wasn’t funny. It wasn’t functional.’

– External observer speaking about the dead flat Secretariat management structure introduced in 2016
within the Secretariat (part funded by the Grant) the core team need themselves to acquire knowledge of each Chapter receiving the Grant and to develop dynamic engagement with them. This is what is required if they are to provide tailored, quality support beyond monitoring spending levels, annual plans and reporting.

In the same vein, we found that some National Chapters have difficulties in providing consolidated or aggregated information on their results. This, together with the feedback gathered during the interviews, suggests that monitoring at the national level is not always a continuous process of a results-based Programme, but rather a one-off activity carried out to meet programmatic requirements.
3. Lessons and Recommendations

Regarding the design of the Grant, IMPACT showed some of the characteristics of breadth and flexibility associated with ‘core’ funding such as had been donated previously by GAC. However, IMPACT aimed to frame those features within a formal Programme, with a Logic Model and PMF, as Programme management theory requires. The design documents that have survived confirm the wish of the donor and the recipient to find a way forward that could reflect the principles of flexibility, agility and localism that underpin anti-corruption work. The result could be seen as a hybrid approach, seeking to combine the best of both worlds – Flexible Grant and Targeted/Restricted Project Funding. IMPACT shows the possibility of respecting the critical principles of flexibility, agility and localism within a Programme framework. It also suggests some important lessons to be learned if the Programme approach is to function optimally for all participants. We have themed these lessons in terms of 1) Working With and Through National Chapters; 2) Programme Management; and Gender Mainstreaming.

Finally, we have added 11 recommendations aimed to help get the very best from the precious opportunities presented by Grants such as IMPACT.

3.1. Working With and Through National Chapters

We found that the design of the Grant was too ‘top down’ in a strongly ‘bottom up’ organisation - and missed some important opportunities as a result. For instance, National Chapters appear not to have played a significant role in developing the Logic Model or PMF for the Programme. Yet, though the Grant was intended to sustain and boost projects already initiated locally, a needs assessment could have helped participating National Chapters and TI-S in energising and supporting desired work for example with businesses, in relation to ‘gender-mainstreaming’, and generally in founding an even deeper and more dynamic relationship with TI-S. The absence of such mutual understanding also hampered Programme management: obstacles and operating issues which the MTR found to lie behind at least some of the reasons for the slow start and Programme overrun could have been identified and tackled earlier.

We also found that the high-level indicators for the Grant were chosen in an unduly siloed manner, failing to engage not only the National Chapters but also important expert resources available within TI-S itself. Closer engagement with the Chapters would have supported the design of appropriate ‘localised’ measurement frameworks, ensuring data was useful to those that were required to collect
Instead, the Grant was saddled with a generic and largely inappropriate measure of country CPI scores. We saw evidence that the proposal development process is now more inclusive of TI-S functions and that the TI-S monitoring, evaluation and learning unit is engaged in checking the quality of performance measurement frameworks. Yet there seemed more scope to engage in-house expertise to ensure that work on this complex topic takes account of trends in corruption measurement and analysis. TI’s focus on behaviour, and legislation and policy change mean that all measurement systems should be geared towards telling this story. Stories of change require depth or nuance which is best captured with the systematic collection of qualitative data and observation. At the systemic level, breadth in the form of quantitative data is insufficient. Observing change, for example in behaviours of government officials and tracking these stories over time could work well to counter drops in the CPI score or other similar measures.

The allocation of Grant resources to TI-S, though substantial overall, was insufficiently responsive to the needs of the National Chapters in relation to the Programme aims. For example, vital specialised input for gender work and for the ALACs fell short. National Chapters told us that they would appreciate more technical support in relation to programme management requirements of the Grant – such as finance, monitoring, evaluation and learning, risk assessment and management. The IMPACT experience suggests that shifting from core funding to a grant programme requires significant additional technical input at National Chapter level.

Moreover, for much of the Grant’s life the core team was poorly placed to provide optimal quality support to National Chapters because it was struggling with gaps and disruptions from ongoing internal re-structuring. It is not for this Evaluation to question the wisdom or timing of those reforms. The lesson we see is that a complex and challenging Programme such as this one requires an adequately resourced, high performing and well-motivated team to manage it effectively and efficiently. TI-S management should manage the Team for depth and quality of support to the National Chapters, not merely achievement of basic bureaucratic outputs. When staff levels are inadequate or specialist resources need to be brought in, these should be prioritised.

'We missed having more regular meetings to get fresh information.'

'It would also have been interesting to be able to consolidate results more often, not to do it after almost 5.5 years all at the same time'

– Speaker at outcome harvesting workshop
3.2. Programme Management

The Grant appeared to meet GAC financial reporting requirements. GAC representatives we spoke to gave no indication of dissatisfaction with the financial reports they received. However, we note that a more detailed financial report could have been valuable for GAC as well as for TI’s IMPACT management team. For instance, variance in significant spending; expenditure on staff salaries by full-time equivalents (FTE); and details on spend by outcomes would have proven useful to understand the Grant’s cost-efficiency and adapt the programme as required.

Upon request, the TI-S was able to provide detailed financial analysis on variation, FTEs and by outcome. The lesson here, however, is that IMPACT grant managers and the donor could have benefitted from the ongoing provision of more detailed financial reports. For example, based on financial analysis, it is understandable that Outcome 3 performed poorly given only approximately 4% of the total Grant budget was spent on this area. If this had been reviewed on a periodic basis, spend (effort) could have been adjusted to better ensure certain outcome areas performed better.

The design of financial reporting frameworks involves complex, technical considerations, going beyond the scope of this Evaluation. The significance we see, going forward, is that grant flexibility requires detailed financial reports, whether the donor asks for them or not. We understand that TI-S routinely provides more detailed financial reports to some donors based on reporting requirements (i.e. EU). That level of detail could become best practice across all programmes.

This level of detail is vital for effective overall Programme management. It is also required so that the Donor can see clearly where the money is going, what it is buying and how that relates to the agreed budget and priorities. The donors we spoke to underlined those considerations in relation to core funding. Such reassurance is at a premium with a grant such as IMPACT precisely because it is flexible and the aims so broadly drawn.

We also found financial reporting gaps in the initial years of the Grant where, for example we could not find records of the basis for initial financial allocations to National Chapters. However, this likely reflected serious staffing pressures and discontinuities arising from internal restructuring issues.

We found that IMPACT’s risk management register fell short of a strategy. Nor did it seem to play a real and active part in day-to-day management. We see a lesson to handle programme risk management as
an active process of disclosure and open ongoing collaborative management – which could synergise with TI’s wider transparency agenda.

We also identify as a lesson to be learned that National Chapters produce Final reports at their level, even if short. This would help improve Programme visibility, maintain institutional memory and show that TI practices at all levels the reporting, accountability and transparency behaviours to which it is publicly committed.

3.3. Gender mainstreaming

Most Ti-S and National Chapter staff commented that the advancement of the gender mainstreaming agenda is an important legacy of IMPACT. Generally there is greater awareness and tools on the importance of gender mainstreaming in the anti-corruption sector. Yet more could have been done to achieve IMPACT’s aims to get a step-change in the important area of gender mainstreaming. The Programme suffered throughout from the lack of trained and dedicated staff to provide support on these issues. The gap was especially significant during the design phase, but National Chapters continue to need ongoing support with a range of practical issues and with a strategy going forward. Gender mainstreaming was pointed out as weak during the MTR and a specialist hire was recommended. The area was of significant interest to GAC. There is an important lesson here – as well as a challenge for the future.

“We started almost from scratch, but the work on gender will continue and there is no way to stop it”.
- TI-S Member

“Gender was a new area for us. We missed having particular and culturally adapted tools.”

“Particular actions such as the development of a public policy to fight corruption or bribery, would not need to have a gender approach because it applies to both men and women.”

“There is an opportunity to create safe spaces to report sextortion and engage in follow up, but tools are needed.”

– Speaker at outcome harvesting workshop
3.4. Recommendations

1. **TI-S and the donor(s) should see to it that such Programmes are created in a more ‘bottom-up’ fashion.** They should invest in participatory Theory of Change development, as well as analyses of local political economies to inform ambitious but realistic proposals. The intervention logic should be captured in an accessible narrative form and made widely available. The Programme PMF – and agile ‘nested’ (subsidiary) National Chapter PMFs, should be at the heart of this process, treated as living documents.

2. **TI-S and the donor(s) should ensure that design of the results framework and its indicators should also be an inclusive, participative and reviewable process, informed by the best available expert advice.** TI’s high-level indices of perceptions of corruption (such as the Corruption Perceptions Index and the Global Corruption Barometer) are unlikely to be appropriate as measures of the ultimate impact of anti-corruption Programmes of this kind.

3. **TI-S should provide better technical support to National Chapters for their participation in the Programme management process, so that they can derive real benefit from it.** This includes finance, monitoring, learning and evaluation, risk assessment and management as well as the development of agile / localised indicators and targets that do justice to the reality of the corruption in specific contexts.

4. **Top TI managers should see to it that stable Secretariat support is available throughout the life of such projects and that staff resources are adequate to make the quality contribution demanded.**

5. **TI-S and donor(s) should provide specialist strategic support in the Secretariat for national ALAC cases as well as for gender mainstreaming to consolidate and develop the Grant’s gains.**

6. **More generally, TI and donor(s) should ensure that trained and dedicated staff are available to provide support on gender mainstreaming throughout gender-themed Programmes.** They should consider using consultancy services, if there is no in-house capacity, to set up a gender helpdesk providing guidance and training tailored to the context of the different Chapters, especially at the outset.
7. In potential new collaborations the ‘Global Affairs Canada's Feminist International Assistance Gender Equality Toolkit for Projects’, or other available international tools should be applied systematically.

8. TI-S should publish clear criteria on budgetary allocations to National Chapters, as was done for the ‘mini grants’. TI-S should also consider a policy of promoting open allocation meetings, allowing participation from National Chapters and implementing parties.

9. Irrespective of donor requirements, TI-S should seek routinely to provide highly informative financial reports to the programme team and to the donor. For instance, spend by outcome; FTEs; and major variances in line item spend.

10. All National Chapters should produce final reports, with aggregated data, organised by their unique PMFs.

11. There should be a joint National Chapter/TC-S mechanism for actively reviewing and managing risks. Risks should be openly identified and managed as part of a core commitment to transparency. Ongoing risks, following any initial mitigation, should be clearly identified, monitored and regularly reviewed.
4. Appendices

4.1. Appendix 1: Methodology

Aleph adhered to and applied the overall guiding principles and ethical guidelines elaborated by the TI-S MEL unit\(^9\). In particular, it made reference to the TI Impact Matrix to help understand the relevance of IMPACT’s identified outcomes. Tactically, Aleph navigated the evaluation process according to the Terms of References following four guiding principles:

- Follow the evidence where it leads;
- Cross-check and triangulate information to establish veracity and a robust independent assessment;
- Work with the Secretariat team, engaging them proactively in discussions and reflections throughout; and
- Listen to as many external voices as possible, despite the time constraints and challenging context.

In line with client requirements, this high-level evaluation was delivered in three phases over 6 weeks in August and September 2021.

**Figure 9: Phases and Components of Evaluation**

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Phase 1 - Inception

We conducted a Desk Review of the IMPACT Grant literature to understand the overarching architecture and strategic objectives, followed by an initial scrutiny of data from the NCs. This included an initial review of the logic model and associated Performance Management Framework (PMF), scrutiny of monitoring plans and data, the programme proposal, annual and mid-year reports, impact cases and the Grant’s Mid-Term Review. The inception period also included examination of some academic and other commentaries on anti-corruption measures globally, helping us to contextualise and understand the wider picture (see the select bibliography at the end of this Appendix for more details).

During the inception period, Aleph conducted early-engagement consultations with a selected number of core staff within TI-S and stakeholder groups to contextualise the literature, refine avenues of enquiry, prioritise key reading and ensure that the detail of the approach was attuned to TI’s operational context and activities and aligned with TI’s Impact monitoring approach. Following careful consideration and discussion with TI-S, we developed an Evaluation Index60 to help support our analyses for this evaluation. The Index reflects our refinement and calibration of the IMPACT Grant research questions highlighted in the ToR. It also reflects our review of the scope, scale and operational context of the IMPACT Grant. The list of areas and indicators we created strengthened our bases for value judgements and enabled the whole team together to consider and assess the various data collected and make a common assessment. The final report drew significantly upon the Index but treated it as a source to be considered alongside others in crafting a final narrative and recommendations.

Finally, we selected key informants for interviews and case-studies and designed various interview and workshop guidelines covering different target informants. Our selection of interviewees and questions sought to capture multiple perspectives, opinions and relations surrounding the intervention to ensure a well-informed analysis and recommendations. Choices of key informants was designed to be

60 Aleph’s approach is underpinned by our proprietary Evaluation Index. This is designed to provide a transparent, robust and replicable measurement framework for programme managers. The Index draws on the OECD-DAC Evaluation Criteria for relevance, coherence, effectiveness, efficiency, sustainability and impact. Given the short timeframe for this exercise, the Index for the IMPACT grant prioritised: relevance, efficiency/effectiveness (in particular progress on recommendations from the mid-term review), sustainability and impact. It contains a mix of standardised indicators corresponding to ‘universal good practices’ for programme delivery, and bespoke indicators tailored to each programme. Each of the OECD-DAC pillars is broken down into evaluation areas, which comprise a series of indicators. These are scored on a simple 1-3 scale, where 1=bad, 2=satisfactory, and 3=good. The higher the score, the better the assessment. The IMPACT Grant was assessed against each indicator, which creates an aggregate score for the area, which in turn provides an aggregate score for each pillar. The Index is not intended to function as a quantitative analytical tool, rather it reduces subjectivity and provides a transparent means of verification.
representative, diverse and cross-sectional, including a range of opinions and perspectives (for example, rural/urban, regional/local, old/young, close to the management unit/far away, male/female, etc.). In particular we aimed to ensure:

- All the key components of the programme are reflected in the interviews;
- Final beneficiaries are represented;
- Some external observers with no stake in the programme were included;
- That the sample allowed a gender-sensitive analysis.

Phase 2: Interviews

For phase 2 of the evaluation, we collected data from stakeholders remotely via video-teleconference systems using both interviews and workshops. We used ‘outcome harvesting’ techniques with representatives of National Chapters and we examined strengths, weaknesses, opportunities and threats (SWOT) of the IMPACT grant. We identified key questions in order test causality during the remaining elements of the data collection phases and encouraged reflection on core programme assumptions, and potential new programme outcomes. This also allowed us to explore the extent to which the programme impacts direct and indirect beneficiaries.

Table 6: National Chapter Outcome Harvesting Workshops and Interviews

<table>
<thead>
<tr>
<th>Country</th>
<th>Method</th>
<th>Rationale</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ghana, Nigeria</td>
<td>Outcome Harvesting</td>
<td>English language preference; similar activities</td>
</tr>
<tr>
<td>Mozambique</td>
<td>Outcome Harvesting/Key Informant Interview</td>
<td>Portuguese language preference; dropped out of programme</td>
</tr>
<tr>
<td>DRC</td>
<td>Outcome Harvesting/Key Informant Interview</td>
<td>French language preference</td>
</tr>
<tr>
<td>Trinidad and Tobago, Jamaica</td>
<td>Outcome Harvesting/Paired Interview</td>
<td>English language preference; similar activities</td>
</tr>
<tr>
<td>Argentina, Colombia, Guatemala, Honduras, Perú, and Venezuela</td>
<td>Outcome Workshop</td>
<td>Spanish language preference; similar activities</td>
</tr>
</tbody>
</table>

Table 7: Objectives for the NC Workshops

<table>
<thead>
<tr>
<th>Objective</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Objective 1</td>
<td>Identify the perceived outcomes of the grant over the last five years</td>
</tr>
<tr>
<td>Objective 2</td>
<td>Capture key lessons learnt and good practices</td>
</tr>
</tbody>
</table>
Objective 3: Refine sampling methodologies for the external stakeholders and case study selection

We used the workshops and interviews to determine case studies to check how the Grant has (or has not) helped bring about change on the ground.

Table 8: Case Study Shortlisting

<table>
<thead>
<tr>
<th>Selection Criteria</th>
<th>Proposals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Geography</td>
<td>2 from Latin America (Guatemala and Colombia)</td>
</tr>
<tr>
<td></td>
<td>1 from Africa (Nigeria)</td>
</tr>
<tr>
<td>Outcomes</td>
<td>1 focused on: empowered people, groups and communities demonstrating that corruption can be challenged effectively</td>
</tr>
<tr>
<td></td>
<td>1 focused on: Improved anti-corruption policy and practice by local, national and regional public institutions, including on safety and security</td>
</tr>
<tr>
<td></td>
<td>1 focused on: Increased commitment to transparency, accountability and integrity in business practice</td>
</tr>
<tr>
<td>Impact Matrix Components</td>
<td>Contains a mix of elements of policy and institution change; behaviour change; and outreach and awareness</td>
</tr>
<tr>
<td>Positive impact story or lessons</td>
<td>At least 1 contains lessons of what ‘did not work’ in order to improve programming</td>
</tr>
<tr>
<td></td>
<td>At least 1 contains an impactful story of change from the ground</td>
</tr>
<tr>
<td>Key Stakeholder groups</td>
<td>1 focused a government body (national, local, etc.)</td>
</tr>
<tr>
<td></td>
<td>1 focused on a business / businesses</td>
</tr>
<tr>
<td></td>
<td>1 focused on communities / civil society</td>
</tr>
<tr>
<td></td>
<td>Vulnerable groups will be prioritised, in particular women/girls</td>
</tr>
<tr>
<td>% of Funding</td>
<td>Beneficiary countries can be ranked by budget allocated</td>
</tr>
<tr>
<td></td>
<td>Next, % of budget focused on each intended outcome</td>
</tr>
<tr>
<td>Lessons and Recommendations from mid-term</td>
<td>The MTR details a number of good practices and recommendations in the immediate term and beyond the Grant. ‘What happened’ from these considerations should form part of the selection process</td>
</tr>
<tr>
<td></td>
<td>For example, did other beneficiary countries adapt the Ghana ALAC Steering Committee approach identified as good practice?</td>
</tr>
</tbody>
</table>

In the light of these criteria, Nigeria was chosen as the most suitable candidate among the 4 National Chapters in Africa and in the light of the significant contextual challenges evident from its declining position in the CPI. Our Initial interviews indicated that the impacts of the Grant on the NC in Guatemala could be instructive and may offer insights into work with particularly vulnerable groups such as indigenous peoples, as well as on gender issues which we heard had been elaborated usefully in a
regional version of TI’s Global Corruption Barometer (GCB). Colombia appeared to offer important opportunities to study the creation and development of an ALAC. The small number of case studies meant that the rationale for our choices, though coherent, was inevitably somewhat arbitrary in nature and dependent upon judgements by others. We bore that limitation in mind in applying the lessons from the studies more generally.

We conducted in-depth qualitative interviews with internal and external stakeholders. In total, we held consultations with 48 key stakeholders. Our sampling approach was to select a large sampling unit including the key groups that we want to reach and then, in consultation with the programme team and the national chapter teams, to individualise the sample according to availability, time constraints and the limited number of interviews we were able to conduct. We paid special attention to gender-balance and the inclusion of vulnerable groups. A list of all interviews follows.

Table 9: Number of Interviews by Stakeholder Group

<table>
<thead>
<tr>
<th>Stakeholder Group</th>
<th>Number of Interviewees</th>
</tr>
</thead>
<tbody>
<tr>
<td>Donors: current and past</td>
<td>6</td>
</tr>
<tr>
<td>TI-S IMPACT Grant Team and managers (present and past)</td>
<td>4</td>
</tr>
<tr>
<td>TI-S other: regional teams, other relevant programmes</td>
<td>9 (includes research, fundraising, ALAC functions, etc.)</td>
</tr>
<tr>
<td>Businesses (through case studies)</td>
<td>1</td>
</tr>
<tr>
<td>Civil Society (through case studies)</td>
<td>6</td>
</tr>
<tr>
<td>Governments (through case studies)</td>
<td>3</td>
</tr>
<tr>
<td>National Chapter Representatives</td>
<td>17</td>
</tr>
<tr>
<td>TI-S Finance Team</td>
<td>2</td>
</tr>
</tbody>
</table>
Phase 3: Analysis and Report Writing

In the final phase of the high-level evaluation, Aleph’s team drew together the findings from the qualitative and quantitative fieldwork to provide an independent assessment and evaluation report containing lessons and practical and actionable recommendations. We filtered the findings into the Evaluation Index and triangulated them so far as possible. Throughout the inception and fieldwork phases, the team generated early hypotheses for each of the indicators in the Evaluation Index. ‘Placeholder’ scores were allocated with justification and available evidence to provide a reference point for subsequent analysis. The analysis phase of the project revisited these scores and tested them against the full set of data sources, triangulating the findings wherever possible to mitigate reliance on isolated data points and providing a blended analysis of the qualitative and quantitative findings. Once the Evaluation Index was fully populated, we drafted a topline narrative report, offering a consolidated analysis of the IMPACT Grant from inception to date across each of the Evaluation Index pillars of relevance, effectiveness and efficiency, impact and sustainability.

Annex: Selected Bibliography

Key Programme Documents

- IMPACT proposal to donor
- Grant agreement
- IMPACT grant request for a no cost extension (January 2019) + Grant Amendment 1
- IMPACT grant request for a 2nd no cost extension (September 2020) + Grant Amendment 2
- Final Budget
- Performance Measurement Framework
- IMPACT Programme targets
- Logic Model
- IMPACT grant mid-term evaluation (2018)
- IMPACT GRANT MID-TERM EVALUATION MOVING FORWARD. Comments to the MTE
- Total targets monitoring file
- Impact total targets tracker
IMPEACT was instrumental in including a chapter on women and corruption in this index.