End-of-Project Evaluation of Transparency International’s Integrity Pacts EU Project

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## Acronyms

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<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
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<tbody>
<tr>
<td>B20</td>
<td>Business 20 (G20's official engagement group for the business community)</td>
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<tr>
<td>BG</td>
<td>Bulgaria</td>
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<tr>
<td>BIG</td>
<td>Basel Institute on Governance</td>
</tr>
<tr>
<td>CA</td>
<td>Contracting Authority</td>
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<tr>
<td>CoST</td>
<td>Infrastructure Transparency Initiative</td>
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<tr>
<td>CSO</td>
<td>Civil Society Organisation</td>
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<tr>
<td>CZ</td>
<td>Czechia</td>
</tr>
<tr>
<td>DG REGIO</td>
<td>European Commission, Directorate-General for Regional and Urban Policy</td>
</tr>
<tr>
<td>DoA</td>
<td>Description of Action</td>
</tr>
<tr>
<td>EBRD</td>
<td>European Bank of Reconstruction and Development</td>
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<tr>
<td>EL</td>
<td>Greece</td>
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<tr>
<td>EU</td>
<td>European Union</td>
</tr>
<tr>
<td>G20</td>
<td>Group of 20 (Forum for 20 major advanced and emerging economies: Argentina, Australia, Brazil, Canada, China, France, Germany, India, Indonesia, Italy, Japan, Republic of Korea, Mexico, Russia, Saudi Arabia, South Africa, Turkey, United Kingdom, United States and the European Union)</td>
</tr>
<tr>
<td>GRES</td>
<td>Gender Results Effectiveness Scale</td>
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<tr>
<td>HU</td>
<td>Hungary</td>
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<tr>
<td>IP</td>
<td>Integrity Pact</td>
</tr>
<tr>
<td>IT</td>
<td>Italy</td>
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<tr>
<td>KPI</td>
<td>Key Performance Indicator</td>
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<tr>
<td>LT</td>
<td>Lithuania</td>
</tr>
<tr>
<td>LV</td>
<td>Latvia</td>
</tr>
<tr>
<td>MA</td>
<td>Managing Authority</td>
</tr>
<tr>
<td>MAFF</td>
<td>Multiannual financial framework</td>
</tr>
<tr>
<td>MEL</td>
<td>Monitoring, Evaluation and Learning</td>
</tr>
<tr>
<td>MTLR</td>
<td>Mid-term Learning Review</td>
</tr>
<tr>
<td>OCP</td>
<td>Open Contracting Partnership</td>
</tr>
<tr>
<td>Acronym</td>
<td>Description</td>
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<tr>
<td>---------</td>
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<tr>
<td>ODS</td>
<td>Organisation Development Support</td>
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<tr>
<td>OECD-DAC</td>
<td>Organisation for Economic Co-operation and Development's Development Assistance Committee</td>
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<tr>
<td>OGP</td>
<td>Open Government Partnership</td>
</tr>
<tr>
<td>PL</td>
<td>Poland</td>
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<tr>
<td>PP</td>
<td>Public Procurement</td>
</tr>
<tr>
<td>PT</td>
<td>Portugal</td>
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<tr>
<td>RO</td>
<td>Romania</td>
</tr>
<tr>
<td>SI</td>
<td>Slovenia</td>
</tr>
<tr>
<td>TI</td>
<td>Transparency International</td>
</tr>
<tr>
<td>TI EU</td>
<td>Transparency International EU Liaison Office</td>
</tr>
<tr>
<td>TI-S</td>
<td>Transparency International Secretariat</td>
</tr>
<tr>
<td>ToC</td>
<td>Theory of Change</td>
</tr>
<tr>
<td>TOR</td>
<td>Terms of Reference</td>
</tr>
<tr>
<td>UNGC</td>
<td>United Nations Global Compact</td>
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</table>
Executive Summary

The “Integrity Pacts (IP) - Civil Control Mechanism for Safeguarding EU Funds, Phase 2” Project was implemented from 1 January 2016 and ended in March 2022. The project was funded by the European Commission, Directorate-General for Regional and Urban Policy (DG Regio), with a total project budget of more than €8.8 million. The project was coordinated and managed by Transparency International Secretariat (TI-S), with 15 implementing partners\(^1\) from 11 countries, and involved the monitoring of 18 procurement projects using Integrity Pacts (IPs). The main goal of the project was to trial the use of IPs in various contexts and promote their use for protection of EU funds.

This report summarises the findings from an independent evaluation undertaken by Ms. Coralie Pring (Team Leader), Dr. Suzanne Mulcahy (Evaluation Expert) and Dr. Juanita Olaya (Public Procurement and Integrity Pact Expert). The evaluation was undertaken between November 2021 and April 2022. The project was evaluated according to the OECD-DAC criteria of relevance, coherence, efficiency, effectiveness, outcomes & impact and sustainability. In addition, the ‘pilot project design’ aspects of the project and its gender-sensitivity and inclusivity were also evaluated. The findings are based on semi-structured in-depth individual and group interviews with 7 TI-S project staff members, 3 TI-EU office staff members, 23 implementing partner staff members, 2 international experts and 2 representatives from DG Regio (1 interview, 1 written testimony) as well as semi-structured in-depth interviews/written testimonies from 5 external stakeholders at the IP level. 95 Project Documents and Literature Sources were reviewed, and secondary data analysis of project monitoring data was also undertaken. A survey of 14 representatives from contracting authorities (CAs) was also undertaken by implementing partners on behalf of the evaluators. A validation workshop was held with implementing partners in March 2022 which was also used to hone the recommendations.

The evaluation finds that the IP is still considered a relevant tool for promoting integrity in public procurement and reducing corruption risks, including for new EU disbursed funds (Multiannual Financial Framework (MAFF) and NextGenerationEU). IPs are considered relevant only in specific circumstances and should be promoted as part of a toolbox, along with other methods involving open data, to promote integrity in public procurement. The project implementers did largely undertake the activities which they set out to. Many partners have demonstrated that their work has contributed to an improvement in the integrity of the procurement processes they were monitoring or identified irregularities - which, without their work, would have likely gone unnoticed. Some other partners reported broader impacts at the policy level which shows signs of sustainability, although occurrences of this were fairly low. Lower levels of achievement were found in the areas of citizen engagement and increasing media engagement on this issue at the national level, and in terms of regional advocacy. Various factors hampered project effectiveness across all stages of the project but notably, staff turnover, lack of capacity in key functions, lack of buy-in from some contracting authorities and issues related to fitting an IP to a donor funded project were noted as key. Despite the challenges faced, the evaluation finds good evidence of sustainability and high levels of motivation to continue

\(^1\) Implementing partners are often referred to as ‘monitors’ - we use the terms interchangeably in this report.
to move this area of work forward. Gender sensitivity and mainstreaming were not part of the original plans for the project and the evaluation noted opportunities for greater gender awareness related to IPs in their future implementation.

The key findings from the evaluation are:

1. **IPs are relevant for promoting integrity in public procurement - including future EU funds, as part of a bigger toolbox of options.**

   There is continued relevance of IPs for promoting integrity in public procurement and acting as a preventative tool against corruption. IPs are, however, only considered relevant in certain circumstances and should be used as part of a broader toolbox of options (including open data, detection and enforcement techniques). They are considered to have relevance for future EU funds (such as MAFF and NextGenerationEU) given the large amounts of funds that will be flowing from the EU to the national level. The new Red Flags Tool developed under this project shows promise for identifying at-risk procurements where IPs can be applied to cases where they can be most effective.

2. **Some partners showed good results on improving integrity and reducing corruption risks in monitored IP projects, and some wider policy-level impacts were also found. Other partners faced challenges, resulting in overall mixed results.**

   The evaluation found several examples of positive improvements in integrity/reduced corruption in the monitored procurements and examples of medium-long term changes were identified including incorporating IPs into national anti-corruption strategies, OGP national strategies and a company adopting a whistle-blower policy. The publishing of regular monitoring reports (by most monitors), along with communications and websites on the project (supported by TI-S) helped contribute to improved transparency. Factors hindering achievement included: limited engagement with companies or professional organizations (i.e the International Federation of Consulting Engineers, FIDIC), difficulties engaging citizens and the media, disinterested/resistant CAs and delays to procurement projects.

3. **The project generated a bank of knowledge and learnings on IPs and their usages.**

   The knowledge products generated via this project (under specific objective 3) have added considerably to the knowledge base on IPs. Some of these products show that TI has already reflected upon and recognises several issues raised in this evaluation report - such as the importance of careful case selection and citizen engagement challenges. This has helped improve the knowledge base on the IP tool in a sustainable way, with the potential to be operationalised in future iterations. Given many of these products came at the end of the project, their contribution to change cannot fully be assessed at the time of this evaluation.

4. **A network of experts on public procurement has been created.**

   A key highlight of this project was its creation of a knowledgeable network of experts on procurement and integrity issues across Europe, who show keen interest and commitment to continuing promoting integrity in public procurement. Some partners are now seen as key experts on the issue of public procurement and have utilised their expertise in initiatives related to the new EU funds and COVID-19 corruption allegations in procurement.
5. There were diverging expectations between different groups regarding the project's goal, objectives and outcomes.

The evaluation found a lack of alignment between the project's goal and specific objectives - which set high ambitions for improved integrity and transparency across all IPs, the aim to undertake a pilot for the purpose of mainstreaming (which demands high standards of comparability between cases) and the implicit aim to learn from a range of contexts, including those where IPs are less suitable, via a bottom-up and highly context-specific approach to implementation. There was no common definition of success among the various stakeholder groups with some opting for a monitoring lite approach. The lack of a logframe and overall project Theory of Change (ToC) have likely contributed to diverging expectations between partners, TI-S, TI-EU and the donor.

6. The Project Management team delivered well despite challenging circumstances, but the lack of human resources to deliver on certain aspects compromised impact.

The TI-S project management team maintained momentum despite staffing shortages and high turnover, focusing largely on building capacities of the monitors, facilitating transfer of capacities from more experienced IP implementers to new-comers, and supporting the set-up of monitoring agreements at the start of the project. They delivered many important learning and communication products in the second half of implementation. However, some key functions such as centralised MEL quality control of monitoring data and international/regional advocacy suffered because of task overload and lack of strategic guidance from TI-S leadership. TI EU's relatively minor role in project delivery and advocacy was a missed opportunity.

7. External partnerships required greater strategic visioning and leadership.

Coherence with external initiatives in the open and clean contracting space by TI-S began strongly but was limited in the second half of implementation, due to staff shortages in the team (including at the senior strategic level) and lack of strategic involvement by TI-S leadership. The engagement by TI-S with organisations such as the Basel Institute on Governance (BIG) and the UN Global Compact (UNGC) has supported greater awareness of the tool and examples exist at the national level of successful collaborations with other organisations, some of which were supported by TI-S and used to amplify TI-S' advocacy positions.

8. The project extensions were needed and justifiable. Cost-benefit analysis has practical challenges. Some projects had high monitoring costs compared to procurements monitored.

The total project budget currently shows only a small underspend, and the cost and no-cost extensions were found to be justified given the delays in the signing of IPs, in the procurement projects roll-out and due to COVID-19. Conclusive analysis of the cost-benefit of the project is not possible with the data available because of the structure of the budgets but also due to conceptual challenges given the preventative nature of the tool. A small number of IPs (4) were found to show high IP project costs in proportion to the total value of the procurements being monitored (i.e. more than 20% of the procurement values), which raises questions about value for money, particularly in two of those specific cases, although they were acceptable to the donor and the project team for learning and capacity-building purposes.
9. Despite the benefits found by undertaking multiple IPs in multiple countries simultaneously which was previously untested, it has revealed implementation challenges.

In trialling this approach, some aspects of the projectisation of IPs from the process for the selection of projects, the timelines for monitoring, comparability challenges between contexts, to the funding incentives for monitors to stay engaged despite unwilling counterparts were found to reduce overall project impact. These offer key learnings for the future application of IPs in the context of donor funded projects.

10. Gender sensitivity and inclusivity was not part of the project design.

Gender inclusivity and mainstreaming was not part of the design or planning process, nor included during implementation.

The recommendations from the evaluation are:

1. Develop an advocacy strategy for improving integrity and corruption-risk management in Public Procurement for EU-funded projects, which positions IPs as one of a toolbox of options which can be deployed.

Capitalise on the increased interest since COVID-19 in improving integrity in public procurement at the EU level and the increase in funds which are being distributed to member states. Develop an advocacy strategy which puts promoting better practice in procurement and corruption risk-management as the central goal and recommend a range of approaches (not just IPs) to identify and correct problems when found. Ensure IPs are only deployed in the right conditions informed by the learnings of this pilot. Collaborate with other INGOs and TI-EU based on their expertise.

2. Ensure future deployments of IPs in the context of multi-country projects address challenges of projectization of IPs

When considering implementing future IPs as part of a donor-funded project, ensure the strategic approach to their deployment takes note of challenging timelines, the importance of case selection, securing strong agreements with CAs and ensuring monitors are not disincentivised to ‘walk away’. Strategize on alternative funding models which avoid disincentivising monitors. Factor in efficiency and value for money into case choice. Ensure minimum standards are defined for clauses IPs must contain and at what point a monitor should withdraw and incorporate an awareness of the incentives of the monitor.

3. Revise and update the goal of the IP tool to reflect the learnings from the pilot.

Engage experts, practitioners and implementing partners to refine and focus the goal of an IP on more realistic expectations. Revise the ToC to reflect different conditions in which monitors find themselves and include a pathway for change for IPs which are cancelled/terminated due to non-compliance or corruption issues found.

4. Consider different approaches to IP project selection based on the intended goal of the work.
Consider selecting IPs to further a specific policy objective, to further integrity on a specific issue or in a thematic area, or based on a risk-based assessment, to ensure IPs are deployed where they can have more advocacy impact. Consider also shorter, time-bound IPs or for specific parts of a procurement project given the temporal and staffing challenges found when monitoring entire procurement processes.

5. **Ensure clarity of project goals, measurability of change, indicators and utilise Logframes to manage expectations, while maintaining flexibility.**

Ensure change indicators are S-M-A-R-T. Incorporate the monitoring of changes resulting from activities from all levels of the project - including the work of TI-S and TI-EU. Utilise Logframes or other similar modes to ensure there is clarity on what changes the project aims to contribute to, with baseline data and targets set which allow for attribution of change to project activities. Maintain a good level of flexibility to changing circumstances, as found in the IP EU project, to ensure course corrections can be made when needed.

6. **Distribute and specify roles and responsibilities reasonably to all parties from the outset**

Given that TI-S as project coordinator was found to be responsible for a multitude of areas of work, some of which were beyond its capacities and could have been better carried out by other stakeholders within the project, future iterations of the project should avoid overburdening any single stakeholder group with multiple functions, especially when they do not have the human resources to deliver. Assess where strengths lie and ensure capacities are there to be able to deliver on the various assigned roles and show flexibility to adapt when changes occur. Ensure that there is sufficient oversight and quality control undertaken. Consider decentralisation, such as devolving advocacy to the TI-EU office, MEL quality control or training/capacity building to partners who show specific strengths in some areas.

7. **Broker partnerships with important organisations in the field of public procurement**

Given Integrity Pacts/civic monitoring to reduce corruption in public procurement is a niche topic with relatively limited expertise globally on this area of work, it is important to collaborate with organisations who are seeking the same advocacy outcomes. Share learnings on what works, and what does not work. Include stakeholders such as professional associations, who may be interested in supporting transparency and accountability in public procurement such as National Associations of Engineers etc.

8. **Capitalise on the knowledge and capacity built among the implementing partners on IPs.**

If capacity is not used shortly, it will be lost. New projects which can utilise skills and knowledge on improving integrity in public procurement should be secured. TI-S should consider supporting the deployment of a ‘train the trainer’ or ‘train the civic monitor’ approach, to allow implementing partners to share their knowledge and capacity gains with other potential civic monitors.

9. **Promote new knowledge tools.**
Given most of the knowledge products were produced at the end of the project, continue with dissemination of those and monitor their impact and use.

10. **Harvest and implement learnings on media and citizen engagement so that these aspects are incorporated only when relevant and add value.**

Undertake a detailed study on the causes of lower achievement in media engagement via this project. Incorporate lessons in this area which have been highlighted through this project, conduct a feasibility assessment, and develop risk-mitigation strategies for media and citizen engagement in future IP iterations. Learn from other monitoring/civic engagement initiatives on other themes (i.e. environmental impact, budget monitoring) to learn what works/what doesn’t work.

11. **Increase resources for MEL for projects of this size and implement learnings from this pilot for designing appropriate approaches**

Ensure large projects have sufficient staffing for MEL. Consider separating data collection for project reporting for the donor from data collection efforts required for pilot project testing. Ensure potential evaluability issues are considered in the design phase and are reflected into the design of the MEL system.

12. **Incorporate gender sensitivity and inclusivity, as well as leave no one behind considerations, for future multi-country projects.**

TI-S should ensure gender inclusivity and mainstreaming assessments are incorporated in the planning stage, and gender and inclusivity considerations are incorporated at all stages of project development and implementation. Empower diverse groups also as monitors.
Introduction

This report contains the findings from the final independent end-of-project evaluation for the project “Integrity Pacts (IP) - Civil Control Mechanism for Safeguarding EU Funds, Phase 2”, (herein: IP EU project), coordinated by Transparency International Secretariat (TI-S). The IP EU Project was implemented from 1 January 2016 and ended 31 March 2022. The project sought to pilot the use of Integrity Pacts - which are a civic monitoring tool - for promoting transparency and reducing corruption risks in EU-funded public procurement investments. This pilot project was funded by the European Commission, Directorate-General for Regional and Urban Policy (DG Regio), with a total project budget of more than €8,8 million.

The report is structured as follows: this introductory chapter provides background and context, in the form of an overview of the IP EU Project's characteristics, both in terms of the logic behind the interventions (ToC) and the project's design and architecture. Chapter 2 describes the evaluation approach, scope and methodology and the limitations of the evaluation. Chapter 3 outlines the evaluation findings, structured according to the evaluation criteria relevance, pilot project design, coherence, efficiency, effectiveness, outcomes & impact, sustainability and gender and inclusiveness. Case studies are included in this chapter. Chapter 4 summarises the conclusions, key findings, recommendations, best practices and lessons learned from this evaluation.

Background and Context

Integrity Pacts (IPs) are a social accountability tool first developed in the 1990s by Transparency International and usually take the form of a legally binding agreement between a public authority and bidders, whereby all parties commit to comply with certain integrity standards and maximum transparency throughout a public procurement chain from pre-tender to implementation and monitoring. Compliance with the IP is monitored by an independent third party - such as a civil society organisation. All monitoring reports are ideally made available to the public on an ongoing basis. Often integrity pacts foresee consequences for when they are breached and can result in the termination of the integrity pact when it is not complied with by the parties.

Since their development, IPs have been used in hundreds of procurement projects in at least 32 countries in a wide range of sectors. However, their use for the monitoring of EU funded procurement projects was limited. The project sought to test how and in what contexts Integrity pacts can be used to monitor Structural and Cohesion Funds funded projects. The lessons from the pilot were intended to inform the mainstreaming of integrity pacts.

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2 Inclusive of 4 project amendment requests, one cost extension at the end of 2019 and one no-cost extension at the end of 2021
3 Basel Institute on Governance (2015) Learning Review: Transparency International’s Integrity Pacts for Public Procurement
DG Regio and TI-S began a partnership on the piloting of IPs for EU-funded projects in 2014, and the project has been implemented in two phases. Phase 1 involved knowledge sharing on the tool and an application and selection process for procurement projects to be monitored. Phase 2 (which is the subject of this evaluation) had the following general objective:

“To explore and promote the use of Integrity Pacts for safeguarding EU funds against fraud and corruption, and as a tool to increase transparency and accountability, enhance trust in authorities and government contracting, contribute to a good reputation of contracting authorities, bring cost savings and improve competition through better procurement.”

and these three specific objectives:

1. Ensure integrity and accountability in 18 projects co-financed by EU Structural and Cohesion Funds;
2. Ensure transparency and access to information in 18 projects co-financed by EU Structural and Cohesion Funds;
3. Draw lessons from the pilot for future replication and mainstreaming of Integrity Pacts.

According to the underlying logic for the project and the IP ToC, IPs help to set precedents and guidelines for clean practices in the public procurement process, thus contributing towards greater confidence among the public, government agencies and the private sector that funds are being spent efficiently and as intended. They are also considered to be a method which identifies irregularities and can bring redress if corruption does occur. A thread running through the intervention logic is that the IP is considered as a mechanism to bring those affected by large publicly funded projects closer to the procurement processes. By informing citizens and engaging them in monitoring, the project hoped to have a knock-on effect that public procurement projects would better reflect the public interest, particularly the interests of those communities and groups most affected and build trust that the funds were being well spent. That meant engaging these communities in monitoring the procurement along as many phases of the project as possible (from pre-tender to implementation and evaluation).

The project had developed a ToC describing what changes IPs could contribute to (see Annex 1). According to this ToC, IPs have 6 potential short-term and 8 potential intermediate outcomes. The short-term outcomes referred to potential changes as a result of the monitoring of a specific procurement project - for example, changes at the level of the targeted CAs, bidders and engaged citizens or media. The intermediate outcomes referred to higher order changes at the country level such as policy and institutional change (improved enforcement, policy adoption institutional processes) or behavioural change (better monitoring by citizens and the media). Not all these outcomes were targeted by each individual project partner. Instead, individual project partners had the flexibility to focus on whichever pathways/outcomes they deemed most relevant, given the specific context in which they were operating.

The project did not have an overall ToC describing the changes that the project, i.e. all 18 IPs collectively plus TI-S and TI EU’s activities, would contribute to. It was however clear in the Description of Action (DoA) that the project overall was designed as a pilot project and one of its core objectives was to extract learnings for future application of the IP tool in EU-funded projects or internationally,
with an aim of investigating whether IPs could be scaled-up or mainstreamed. Dissemination, promotion, outreach and advocacy (at local, national and regional levels) were also central to the project’s objectives. Across the whole project, an emphasis was placed on gathering and sharing lessons learned, best practices and stories of impact via a robust MEL system and communications channels.

**Project Set-up**

The set-up of the project began in Phase 1 with knowledge exchange with various stakeholders on IPs, peer exchange discussions and the sharing of guidance materials, and the initiation of a MEL framework. This phase was intended to build interest among both monitors and Managing Authorities (MAs) for involvement in the implementation of IPs. In May 2015, DG Regio published two calls for expression of interest - one of which was addressed to MAs/public bodies and the other to civil society organisations (CSOs). Received expressions of interest were assessed by an Evaluation Committee against the criteria set in the calls and resulted in the selection of shortlisted expressions of interest from CSOs matched with shortlisted expressions of interest from public authorities. As a result, 18 projects, co-financed by the EU Structural and Cohesion Funds, in 11 Member States (BG, CZ, EL, HU, LT, LV, SI, PT, RO, IT, PL) were selected for the project. The concurrent application of IPs across a diverse set of EU Member States was seen to provide a unique opportunity for learning and exchange of experience among all actors involved.

**Figure 1. Map to show Integrity Pact Locations**

Following the selection process, phase 2 of the project (which is the subject of this evaluation) began with the planning, preparation, signature, and implementation of 18 IPs across 11 EU Member States. For the implementation of IPs, no standardised IP format was foreseen, but rather the IP approach was to be adapted to local contexts. The DoA mentions that “the IP model is a broad approach that can be adapted to different needs and contexts”. TI-S provided the partners with many resources including...
a model Integrity Pact on which they were encouraged to ‘draw on for inspiration’. The guidance stated clearly however, that it ‘should not however be viewed as an off the shelf model to be applied in all contexts’. To our knowledge, no minimal standard of provisions or compulsory provisions were foreseen in the contract or agreement between TI-S and the partner organisations. To our knowledge, no minimal standard of provisions or compulsory provisions were foreseen in the contract or agreement between TI-S and the partner organisations. A phased approach to IP implementation was foreseen: a preparatory phase, where beneficiaries and public bodies work through a process of defining and agreeing on the exact terms of an IP; an IP establishment and signature phase, where official formal Memoranda of Understanding would be signed by the parties and the process of monitoring begins; and an IP implementation phase, wherein, for each public procurement procedure, beneficiaries would monitor all phases of the bidding and contracting process, as well as the contract execution phase.

**Project Architecture: Structures and Roles**

The project was managed, according to the Description of Action (DoA), by TI-S which was tasked with the overall coordination of the project, quality assurance of project implementation at all levels, promotion and dissemination of the project results, necessary training and capacity building and the capturing and dissemination of impact, lessons learned and best practices. For all activities in outreach and communication at EU-level, TI-S was to be supported by its Brussels-based affiliated entity – Transparency International EU Office (TI EU). Apart from TI-S (the coordinator) and TI EU, the project beneficiaries were the following 15 civil society organisations, 10 of which are members of the TI movement and 5 of which are external to TI, who acted as independent monitors for the IPs:

**Figure 2: Table showing monitors, monitored projects and value of projects**

<table>
<thead>
<tr>
<th>Independent Monitor(s)</th>
<th>Monitored Project(s)</th>
<th>Monitored PP Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>ActionAid International Italy</td>
<td>Rehabilitation of Archaeological Site Sybaris</td>
<td>€2,000,000</td>
</tr>
<tr>
<td>Amapola (Italy)</td>
<td>Resilient Madonie: Education and Energy projects</td>
<td>€14,155,044</td>
</tr>
<tr>
<td>TI Romania and Institute for Public Policy (Romania)</td>
<td>1. Cadastre of Rural Areas; 2. E-catalogue for Schools (with TI Romania) 3. E-culture: The Digital Library of Romania (Culturalia)</td>
<td>1. €312,891,155 2. €34,800,000 3. €10,000,000</td>
</tr>
<tr>
<td>Romanian Academic Society (Romania)</td>
<td>Technical Assistance</td>
<td>€1,600,000</td>
</tr>
<tr>
<td>Stefan Batory Foundation (Poland)</td>
<td>Modernisation of Railway Line</td>
<td>€140,700,000</td>
</tr>
</tbody>
</table>

4 IP Legal Analysis (Internal Document)

5 Some monitors were engaged only in specific lots/procedures of the procured amounts.
<table>
<thead>
<tr>
<th>TI Bulgaria</th>
<th>Zheleznitsa Tunnel in the Struma Motorway</th>
<th>€127,822,970</th>
</tr>
</thead>
<tbody>
<tr>
<td>TI Czech Republic</td>
<td>Technical supervision services for the operation of the MS2014+ Information System.</td>
<td>€166,632</td>
</tr>
<tr>
<td>TI Greece</td>
<td>Flood Protection Pipeline in the Municipalities</td>
<td>€12,610,800</td>
</tr>
<tr>
<td>TI Hungary</td>
<td>1. Construction of a flood reservoir for the rivers Tisza-Tūr; 2. M6 motorway</td>
<td>€89,000,000, €160,000,000</td>
</tr>
<tr>
<td>TI Italy</td>
<td>1. Light Rail Cagliari 2. Technical assistance to the European Social Fund 2014-2020 in Lombardy</td>
<td>€22,500,000, €3,000,000</td>
</tr>
<tr>
<td>TI Latvia</td>
<td>Riga tram</td>
<td>€97,400,000</td>
</tr>
<tr>
<td>TI Lithuania</td>
<td>Revitalisation of the Neris Riverbank in Vilnius</td>
<td>€15,100,000</td>
</tr>
<tr>
<td>TI Portugal</td>
<td>Conservation and Restoration of Alcobaca Monastery</td>
<td>€1,100,000</td>
</tr>
<tr>
<td>TI Slovenia</td>
<td>Renovation of energy systems of 2 hospitals</td>
<td>€3,800,000</td>
</tr>
</tbody>
</table>

*Source: IP EU Policy & Research Data Airtable*

The DoA also foresaw a non-binding advisory committee made up of individual experts external to the project (and TI) which would provide strategic input on how the project could best achieve its expected objectives and goals.
Evaluation Approach

Purpose and scope

The purpose of this evaluation is two-fold: to deliver accountability and to contribute to learning. We note that this evaluation was not originally a donor requirement and that the decision to conduct a final evaluation is an indication of a genuine wish to learn from the project on the part of the project team. The evaluation aims to assess the design and implementation of the project, in order to understand how successful the project has been as a means to implement integrity pacts, to understand which IPs have been more successful than others (and why), and also to assess specifically the success of the learning component of this pilot project. The evaluation covers the entire 6 years of the project, and its geographical scope includes all 11 project countries. It covers all 18 IP projects and activities undertaken by the TI-S and TI-EU teams.

It seeks to be both ‘backward-looking’ by assessing the implementation of the project to date, as well as to be ‘forward-looking’ by reflecting back lessons learnt and generating recommendations to inform the future work of TI-S and its partners. The evaluation has the following 4 main objectives, as stated in the evaluation terms of reference, and further refined during discussions with the project team during the inception phase:

1. **DELIVER A RIGOROUS EVALUATION OF IP EU PROJECT’S ACCOMPLISHMENTS**: The evaluation sought to provide an independent, systematic, and objective assessment of the strengths, weaknesses, achievements, and results of the IP EU Project (including the 18 IP projects), as well as to assess the extent to which it achieved its intended goals.

2. **ASSESS IMPLEMENTATION OF LEARNINGS FROM THE PROJECT’S MID-TERM EVALUATION**: The evaluation aimed to assess the extent to which the project implemented the recommendations from the mid-term learning review and how they contributed to the overall impact of the project.

3. **GATHER LESSONS LEARNT AND BEST PRACTICE**: The evaluation aimed to gather and generate lessons learned and good practices from the implementation of the IP EU Project

4. **PROVIDE FUTURE RECOMMENDATIONS**: The evaluation aimed to deliver clear and forward-looking strategic and operational recommendations for future projects.

Methodology

The approach and methodology for this evaluation, documented and agreed upon in the inception report of 3 December 2021, were informed by the Terms of Reference (ToRs) for the Evaluation, an initial desk review, as well as exchanges and input given during a series of meetings with the project team.

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6 The intention of the project team to organise an end-of-project evaluation was later formalised in a no-cost extension in 2021.
The evaluation was sequenced across multiple phases, with each phase informing the subsequent phase, thereby employing an iterative approach to theory development. The evaluation was undertaken from November 2021 until April 2022. The project was evaluated according to the OECD-DAC criteria of relevance, coherence, efficiency, effectiveness, outcomes & impact and sustainability. In addition, the ‘pilot project design’ aspects of the project and its gender and inclusivity were also evaluated.

The key sources of information used for the evaluation were:

- Semi structured in-depth interviews (individual and group) with 35 TI-S project staff, TI-EU staff, implementing partners and external experts, plus 2 representatives from DG Regio (1 interview, 1 written testimony) (12 Male, 24 Female, 0 Non-binary/other, 1 Prefer not to say)
- Semi structured interviews and written testimonies from external stakeholders for case study verification (2 CAs, 1 Companies Representative, and 1 Ministry of Justice and 1 International Organisation (IO)) (2 Male, 3 Female, 0 Non-binary/other)
- 95 Project Documents and Secondary Literature (see Annex 4 for full list)
- Project monitoring data (including change maps, monitoring logs and Key Performance Indicators (KPI)s)
- Circa 80 Monitoring Reports

A Quantitative survey of CAs - disseminated by the implementing partners on behalf of the evaluation team as part of their end of project MEL activities, which achieved responses from 14 respondents from Slovenia, Hungary, and Italy. All key project staff involved in the project, all key representatives at the TI-EU office and the main representatives from the donor were selected to be interviewed. All implementing partner organisations were selected to be interviewed for this evaluation with all project managers responsible for implementation being selected to be interviewed. They were also asked to recommend any other key staff members who should also be present for the interview. For external experts, the project manager was asked to recommend contacts at external organisations whom they had been in contact with for the implementation of the project. Two of these were selected using a purposive sampling approach based on the relevance of specific activities they had been involved in.

A participatory in-person validation workshop was held in March 2022 in Lisbon with most implementing partners to present key findings and hone key recommendations.

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7 The survey was disseminated by all but 3 implementing partners, but results were only received from 4, thus the survey has a very low response rate. The low response rate was attributed by implementing partners as due to changes of staff within CAs and bidders.
The evaluation incorporated participatory approaches (including self-assessment scoring, causal-linkages for helping/hindering factor assessments, recommendation crafting during interactive validation workshop, and evaluation report review) to ensure the findings represent partners’ and stakeholder views and are inclusive of the range of opinions that exist regarding the design, implementation and outcomes from the IP EU Project. Gender inclusivity and sensitivity were incorporated throughout all phases of the evaluation design, fieldwork, data analysis. The evaluators recommended the inclusion of ‘Gender and Inclusivity’ as an evaluation criteria with specific questions to assess the gender/inclusivity of the project proposed, which were not part of the original TOR for this evaluation. The gender of interviewees was monitored during fieldwork with all possible gender identities offered. The evaluators employed gender sensitive interviewing techniques including managing group dynamics in the case of mixed-gender group interviews. Key questions were analysed disaggregated by gender to assess any specific barriers certain genders faced in this project. Four case studies - which are found in Annex 4 - were selected for further analysis after discussion with the project team (three IP level case studies from Poland, Romania, Portugal and one thematic case study on Monitoring Reports). The three IP level cases were selected following the completion of all interviews with the implementing partners, whereby interviewees identified promising examples of significant intermediate-outcome level change which had occurred during the project. After a preliminary discussion with the project team, three cases - Poland, Romania and Portugal were investigated as they offered the best opportunities for securing external validation of the changes.
reported on by the partners while also offering opportunities for learning about how IPs could support medium/long-term impacts on public procurement (short-term effects were already investigated fully using a comparative case study analysis employed by the evaluators). The 4th case study on monitoring reports was recommended by the project team as a topic they would appreciate further information on.

Limitations and Evaluability Issues

The evaluation faced the following limitations:

- **Interventions highly contextualised**: The project was designed to allow for a bottom-up approach from implementing partners, incorporating adaptive management principles. As some conclusions drawn from the cases may be unique to their setting, the evaluators aimed to avoid generalisations and to make findings as context-specific as possible.

- **Online Only Data Collection**: Due to a resurgence of the COVID-19 pandemic during the fieldwork stage, all fieldwork had to be carried out online with no face-to-face interviews possible. The evaluators used video-conferencing, rather than teleconferencing, wherever possible, to allow for the observation of non-verbal communication cues and build a good rapport with interviewees. The evaluators did however facilitate an in-person validation meeting with all partners towards the end of the evaluation, which allowed for face-to-face conversations to discuss key findings and hone recommendations.

- **Challenges Gaining Access to External Perspective**: Due to the long timeframe of the project and the inevitable turnover of staff in public institutions, access to external contacts was hard to reach. Externals were found using a snowball sampling technique, based on initial identification of potential case studies with the project team. Language barriers and busy schedules led to some external stakeholders requesting email communication on the questions rather than telephone interviews.

- **Project Monitoring Data Delays**: Some data gathered via the MEL system (change maps, monitoring logs etc), were delayed in being finalised at the end of the project, which resulted in an extension being given to complete this evaluation. Data submitted up until 04 April was considered as part of the evaluation. Unfortunately, key data sources (final narrative reports, and partners' non-KPI results) were not provided meaning that the effectiveness analysis may not incorporate all changes.

- **Comparability issues with KPI data**: The evaluation found that monitors reported on recommendations in quite different ways. While a member of the project team explained that the inclusion of both KPIs tracking % and # of recommendations, irregularities, and information requests, should at least partially overcome this issue and noted the challenges in having a common definition, it is the assessment of the evaluators, as well as some project team interviewees, that the lack of common definitions hampers comparability of the KPIs and that the use of accuracy % for comparability is still undermined when the underlying ‘base’ numbers use different understandings.

- **Staff Turnover**: The staff turnover on the project meant that none of the current project management staff members were present at the start of the project. Partners and a
representative from DG Regio were used to complement the analysis of project documents from the start of the project.

- **No overall project logframe or integrated overall ToC:** The project did not have an overall ToC or a logframe. At the aggregate level the project did not set targets for many outcomes at the overall project monitoring level, and the project did not specify how the changes associated with certain activities and outputs for some intermediate objectives would be measured over the course of the project.
Evaluation Findings

1. Relevance

- How relevant is the IP EU Project within the broader context of fighting corruption in public procurement?
- How relevant is this Project’s approach considered for the future protection of EU disbursement of funds, such as for the EU 2021-2027 Multiannual Financial Framework and NextGenerationEU?
- To what extent did the project respond and adapt appropriately to changing circumstances, such as the COVID-19 pandemic and other political events?

The evaluation found a general appreciation among stakeholders of the continued relevance of IPs, as part of a broader toolbox of anti-corruption tools to reduce corruption and promote integrity in public procurement. This was expressed with the caveat of the need for a careful selection of which projects to monitor - a risk-based approach was most often mentioned as being appropriate for project selection. IPs are considered by many stakeholders to have relevance for the future disbursement of EU funds, particularly given the amount of funds flowing from the EU to national governments via the post-pandemic recovery effort and the limited capacities for oversight in national oversight bodies. Overall, the evaluation found the project to be appropriately flexible to changing circumstances - however missed opportunities identified included some national partners not attempting to move citizen engagement activities into digital/online formats and a failure to adjust to unforeseen staffing changes at TI-S, often leaving the project without senior advocacy and strategic guidance support.

Relevance of IPs for fighting corruption in public procurement

Interviews with all stakeholder groups indicate that they perceive the IP approach as relevant for the promotion of integrity and best practice in procurement and has the potential to reduce corruption risks. It was noted by some implementing partners and an external stakeholder that the use of the tool to expose actual cases of corruption and fraud was limited and should not be the intention of the tool. They felt instead that IPs can successfully showcase good practice and find weaknesses in procurement systems which can have long running benefits for reducing corruption risks (see sections below on ‘effectiveness’ and ‘outcomes and impact’ for further details). While audits take place after a project has finished, IPs were said by interviewees to have the benefit of providing on-going monitoring of procurement processes allowing for real-time identification of both integrity and corruption risks. They are therefore a useful preventative tool and can lead to long-lasting changes in practice.

Almost all interviewees noted, however, that IPs have relevance only in certain circumstances and they are not an appropriate tool for all procurements. They emphasised the importance of careful case selection which offers most promise of benefits from civic monitoring, with many emphasising that level of corruption risk should be considered for project selection or the tool should be applied in
countries where corruption risks are higher. Others mentioned the relevance mainly for large value projects where preventative measures have most value - although there were some partners who disagreed that the focus should only be on financially ‘big’ projects, seeing relevance also for those projects which are of particular national and/or local interest. In the evaluation validation workshop participants reflected that the goal of reducing corruption/improving integrity should be kept in mind with a clear understanding of the policy change, thematic area or risk-level being part of the selection criteria. Overall, the evaluation finds that the relevance of an individual IP can only be determined by prior careful examination of the proposed project and the surrounding circumstances. Among the many factors that need to be considered to determine the suitability of an IP/procurement project pairing are: the level of public interest/perceived importance of the procurement project for a community, the financial value of the project, the degree of complexity and technical conditions surrounding the project, the institutional capacities, prior corruption ‘record’/risk level and level of buy-in for an IP of the implementing CA. The learning that IPs should be selected based on initial analysis about where they can add value appears to have been internalised by the project team at TI-S over the course of implementing this project, as evidenced in several of the learning products.

IPs are seen to have a particular benefit to raise awareness of integrity issues in procurement, to build capacity of stakeholders and to deter or prevent corruption from occurring. Given this, interviewees across all stakeholder groups noted that IPs should still be considered a relevant tool as part of a toolbox of options which are available to reduce corruption risks and promote integrity in public contracting. Other complementary tools that were mentioned by internal and external stakeholders included open data analysis as an approach to flagging corruption risks (such as that generated by the TI EU's Integrity Watch: Red Flags Tool and a similar red flags tool built by TI-Hungary with partners K-Monitor, PetaByte and big data social accountability tools such as Dozorro, a Ukrainian civic monitoring tool building on the government’s e-procurement system offering a channel for citizens to submit feedback and report violations across public procurement cycles. Other civic technology tools and advocacy platforms mentioned were the International Budget Partnership and Funky Citizen’s public spending and participatory budgeting tools in Romania.

Innovations of the IP EU approach

The project had a number of intended innovations and planned to add value in various ways. The implementation of numerous IPs simultaneously as a multi-country project, in various contexts and

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8 During the evaluation workshop, implementing partners reflected the following as potential selection criteria for future IPs: Level of risk, issue area, or policy outcome
9 See for example Integrity Pacts in the EU: Suitability, set up and implementation. A practical guide to civic monitoring of public contracting projects.
10 https://www.redflags.eu/
12 https://dozorro.org
13 See Integrity Watch Red Flags: http://redflags.integritywatch.eu
14 See https://internationalbudget.org
15 Funky Citizens tool (Romania) https://banipublici.ro/category/vizualizari;
across various sectors - including in countries which had not previously undertaken IPs - was a previously untested innovation. By analysing the findings from the 18 IPs, the project planned to generate learnings for the future roll-out and mainstreaming of the tool. Ultimately, a number of interviewees reflected that mainstreaming IPs is no longer a feasible ambition for the tool, and the project team and DG Regio have revised their intended approach, reflecting an important learning from the project. The projectisation of the IPs, particularly the multi-country approach, was also found to have drawbacks, in particular because of the inevitably very different timelines of the various procurement projects which made synchronisation difficult. Stakeholders also mentioned that the incentives for the monitor to stay engaged in the IP, even in circumstances where they might otherwise have withdrawn due to the IP being breached, were unfavourable from the point of view of an advocacy organisation. The inclusion of partners from outside of the TI movement was also a new approach, which worked well and is in sync with the view that for IPs to be used more broadly, a larger net of monitors would be needed, beyond TI national chapters. The MEL system - which was developed to capture such learnings over the course of the project - was another example of a planned innovation and was experimental in many respects. It combined both qualitative and quantitative approaches, outcome harvesting and external validation and trialled the use of the Transparency International Impact Matrix, which had only recently been developed at the time this project began and this project was one of the first of its size to apply the tool. The role of DG Regio, which was highly engaged throughout the project, also added value in certain ways by maintaining momentum over the course of the project lifecycle. Their role in following up on irregularities/problems found by monitors was not foreseen in the DoA, and some implementing partners felt this was a missing aspect which may have supported more effective and timely responses to issues found. The ambition to involve citizens in the monitoring of IPs was also an innovation and added value to the knowledge base on IPs by producing several important outputs in this area (see section ‘Effectiveness’). Unfortunately, COVID and other limiting factors meant this aspect was not fully tested via this project. The project did show real added value for implementing partners in terms of capacity being built in public procurement and knowledge product production.

Future disbursement of EU Funds

Numerous interviewees from the various stakeholder groups confirmed that IPs have relevance (in certain specific cases - see above) for the protection of EU disbursed funds such as the 2021-2027 Multiannual Financial Framework (MAFF) and NextGenerationEU. While the DOA and ToC narrative contain few specific details of the specific corruption/integrity context for EU funded projects, many

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17 Other examples of its use in large TI projects include the Action Grant Project and the Asia-Pacific programme (2016-2019)
18 Mixed views were expressed on the donor’s role - some partners felt that it was inappropriate that the donor was so hands-on and involved in the day-to-day operation of the project. Others felt this was a sign of commitment from the donor and welcomed an active donor who was also willing to step in when political situations arose with contracting and/or managing authorities and there was a need for EU support on the national level.
implementing partners confirmed that, in their country, procurement processes are at risk of corruption, or that CAs lack the capacity, skill or resources to identify and close integrity gaps in their systems. The issue of corruption in procurement has grown in terms of regional interest over the course of the programme due to wide-spread attention given to procurement with PPE and emerging corruption scandals. The sheer amount of funds which have flown recently from the EU to national governments (and will continue in coming years via the mechanisms mentioned) is unprecedented and it was noted by interviewees that they felt the EU institutions do not have capacity to monitor this high amount of funds, which puts them at great risk, and would benefit from the additional oversight via IPs. Some partners though did perceive EU funding to already be less prone to corruption than national funds in their specific country, with one partner commenting: “It is the right medicine but applied to the wrong patient”. A detailed risk analysis of EU-funded projects versus nationally funded projects would be worthwhile undertaking in future to further explore this finding, with risk likely to vary from country to country.

For future IPs, it was suggested that the Red Flags tool could be used to identify high-risk EU funded projects, or IPs could be targeted for funds flowing to certain countries or sectors with higher corruption risks. Overall, the IP was seen by the majority of monitors as being a relevant tool for the protection of EU disbursed funds (such as the 2021-2027 MAFF and NextGenerationEU) with the following caveats: IPs should be applied to monitor EU-funded projects following detailed context analysis of the circumstances, to ensure IPs are only rolled out where they are likely to be most effective, and particularly where the value of providing a pre-emptive/ preventative approach is seen to be most beneficial, such as big projects of societal interest in sectors that are most vulnerable to corruption. Stakeholders emphasised that TI should consider what their goal is when promoting IPs for future dispersed funds, and it was recommended that the goal should be on improving integrity/reducing corruption risks, rather than promoting IPs. The political dynamics between the EU and the member states is another important factor which needs to be considered when rolling out IPs. One monitor mentioned that engaged citizens had expressed that by funding this IP EU project, they felt that the EU did take corruption seriously and wanted to prevent misspending of funds in their funded procurements suggesting a continued strategic importance to the EU for continuing this work. The team has mobilised on this relevance for future EU funds and is in discussions with DG Regio and a multilateral developmental investment bank (see Section ‘Sustainability’ for further details).

**Adaptations to Changing Circumstances**

The project made several adjustments over the course of the project. The timeline for the project was initially to run from 1 January 2016 until December 2019, but it was granted one cost-extension, one no-cost extension and four project amendment requests which resulted in a final completion date of 31 March 2022. These were in response to various challenges which the team faced including delays in signing of IPs, delays on the side of the procurement projects, and COVID-19 pandemic-related delays.

Other adjustments, necessitated by the pandemic, included changing a planned in-person end-of-project meeting to an online event, and allocating the corresponding resources to other relevant
outputs (such as the TI-EU Red Flags Tool).\textsuperscript{19} Partners also adapted their ways of working and plans due to the pandemic, which prevented in-person meetings, caused further delays to procurement projects, and prevented citizen engagement activities (many of which had been planned for later in the project lifecycle). Such changes were necessary given the extraordinary circumstances and to avoid unnecessary risk in spreading the virus. Implementing partners reported mostly positively about the switch to online meetings and modes of communication which allowed for more frequent sharing of knowledge between partners. In addition, the pandemic also brought heightened interest in public procurement with numerous scandals due to corruption cases during the rushed procurement of medical goods and protective equipment. Both TI-S and some implementing partners were found to adapt and respond flexibly with COVID procurement-related research, media outreach and advocacy (See ‘Coherence’ section for more on Advocacy).

The project team, with the support of the donor, showed high levels of appropriate flexibility in their responses to implementing partners who suffered challenges and delays in the delivery of their selected project to be monitored. In Hungary, a procurement procedure which was originally selected for the IP and was monitored for 5 years up until the contract awarding, was instead funded from national funds in year 6 for its implementation. As a result, it was no longer eligible for this pilot. TI-S, with the support of the donor, allowed TI-Hungary to dedicate the remainder of the project to their other IP and to add new activities such as the EU-funded corruption database, COVID-19 activities, and the update of the Hungarian Redflags platform. In the case of TI-Romania and IPP, a project that was selected for them to monitor faced extensive delays. Again, they were allowed to instead monitor a different but relevant project. Such flexibility was highly welcomed by implementing partners, supported the continued knowledge generation and should be retained and acknowledged when designing future projects on IPs.

The project also allowed for high levels of flexibility for implementing partners in how they approached the monitoring. The bottom-up approach was intended to allow the interventions to respond to the local circumstances and the needs of their monitored project and adjust accordingly. In some cases, such adjustments have been found to have undermined the effectiveness of the monitoring (see ‘Effectiveness’ Section), with monitors making concessions to CAs to get sub-optimal agreements signed. On the issue of citizen engagement, partners were found to have approached this aspect of the project in a variety of ways based on their specific context, which was logical and justifiable. Despite the opportunities for flexibility, some partners did not undertake citizen engagement at the end of the project due to the COVID-19 pandemic, with the methodology not updated reportedly as it was at the end of the project, which can be considered a missed opportunity to explore other ways of citizen engagement via online and digital modes. Some monitors reflected that their project was not a good selection for involving citizens as it is too technical, or project site too far away from urban centres for people to feel directly affected.

The evaluation noted that the project also attempted to respond and show flexibility when faced with unforeseen staff shortages at TI-S and organisational restructurings over the course of the project.

\textsuperscript{19} Summary of amendment request_16.03.2021
Specifically senior leadership on the project in policy and advocacy, but also communications, support, was lacking. While some adjustments were made, such as seconding implementing partners for consultancy support in Policy and Advocacy, opportunities were missed to readjust budget allocations, for example to give a more leading role to the TI-EU office in advocacy, given staffing shortages at the TI-S.

2. Pilot Project Design

As described in the DOA, the project was intended to pilot the use of IPs for the monitoring of EU-funded projects, which would be used to inform “the scale-up and/or potential mainstreaming of the use of IPs.” The evaluation has assessed the initial design of the project (including case selection and flexible design) as a pilot for the purpose of generating knowledge for mainstreaming and has found that the design did not fully support the ambition, principally due to the high levels of variation between the 18 IPs. The ToC (which exists for the IP projects but not for the project overall) did make some adaptations over time but while it was intended to be a living document, significant revisions later on to reflect learnings from the partners were largely missing. Several partners felt the ToC showed high levels of ambition. While the project team explains this as it was intended to show all possible pathways rather than an expectation that these would all necessarily be delivered by all partners, this understanding was not always well understood by partners. The MEL System, which also made some significant changes during the implementation period, was a welcome attempt to generate both comparable and context-specific data to monitor implementation and inform knowledge products. It did suffer challenges due to the complexity of the project itself, as well as the lack of sufficient staffing to support implementation and to quality control the data centrally.

Case Selection of IPs for the Pilot Study Design

The evaluation finds high levels of variation between the 18 IPs across all stages of the project (both independent and dependent variables). The following variations were identified via interviews and documentary analysis as being particularly important:

1. **Partner Selection Process** - a mixed approach was used for gathering applications from managing authorities/public bodies and civil society monitors. In some cases, these organisations agreed in advance to participate and submit ‘joint’ proposals. In other cases, they applied completely separately, and the Evaluation Committee decided which ones to partner together

2. **Contracting Authority Willingness to engage** - related to the first point, in some cases the CA was fully engaged and willing to take part in the pilot. In other cases, the engagement was described by partners as being ‘imposed’ upon the CA by the MA.

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20 Annex 2 Description of Action P. 7
3. **Country Contexts** - 11 EU countries involved, with varying levels of corruption, different political systems, and space for civil society

4. **Legal Framework** - in one country (Italy) IPs can be legally mandatory\textsuperscript{21} for bidders, in other contexts this is not allowed

5. **IP Agreement** - for some IPs, monitors needed to make concessions to the CA in order to get the agreement signed, leading to ‘suboptimal’ agreements in place

6. **Sector** - monitors were following a range of procurement for projects in various sectors from the construction of motorways to the renovations of monuments

7. **Number of Procurement Processes** - for some IPs, monitors were following many procurement processes, in others just one process was being monitored.

8. **Stage of the Procurement Process** - for some IPs, monitors were engaged with the CA from early in the planning stage while others were involved only once contracts were in tendering phase or had been awarded

9. **Duration of the monitored projects** - monitored projects were at different stages at the end of the IP EU project end date.

10. **Total cost of the project being monitored** - the total value of the projects being monitored varied substantially from approximately €130,000 to €250,000,000.

11. **Risk Profile of Project or Contracting Authority** - some projects were known to have substantially higher risks of corruption, or CAs with greater integrity/capacity issues

12. **Intended goals/outcomes the monitors would be seeking to contribute to** - Monitors were able to select which outcomes they intended to contribute to out of a total of 14, resulting in different goals. There was variation in both the types of outcomes targeted and the total number of outcomes by each partner (ranging from 1 to 4 outcome areas). There was not one single outcome area that was common across all partners (see Figure 4 below).

13. **Staffing changes** - some monitors faced staffing changes over the course of the project - when this resulted in lack of institutional knowledge, this caused difficulties. For others there were changes in staffing in the monitoring authority.

14. **Political changes in the country** - in some countries there was political turbulence and changing political will for promoting integrity in public procurement

15. **Relevance for citizen engagement** - some monitors reflected their project was not a good selection for involving citizens (too technical, or project site too far away from urban centres for people to feel directly affected)

While variety was originally foreseen at the start of the project to allow knowledge to be generated from a range of contexts, given the total number of IPs is only 18, the evaluation team finds this level of variation undermines the ability to draw generalisable conclusions, rather than anecdotal evidence which is contextual. As described in further detail in the section ‘Effectiveness’, a number of these factors were reported by monitors to have undermined the effectiveness of their monitoring activities and have therefore hampered the understanding of where IPs can be truly successful. That said, the 18 cases were able to support learning and resulted in a body of knowledge on IPs.

\textsuperscript{21} Although in Italy the legal provisions are more limited than the more comprehensive IP agreements.
Conditions for Mainstreaming

Other considerations for the design of a pilot study are specifying testable hypotheses which would be explored and answered during the project, gathering sufficient quality comparable baseline data on the ‘status quo’, and identifying control groups. Given the cost would also be an important metric when deciding whether or not to mainstream IPs, disaggregated costs of the monitoring activities themselves should also have been collected over the course of the project but that was not foreseen (see section on ‘Efficiency’).

The partners were given the space to develop a highly context specific approach to how they undertook their monitoring and a variety of models were ultimately used. This included in one case a ‘Monitoring Lite’ approach whereby documents were only provided to the monitor after the fact, in place of real-time monitoring. Other partners were unable to publish their monitoring reports without

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22 Figure 4 is an attempt to map the partners’ various combinations of expected results. The evaluators found broad variation in the number of outcome areas that the partners expected to contribute to (ranging from 1 area to 4 areas) and the various combinations of outcomes. As mentioned previously, there was not one single outcome area that was common across all partners.
the approval of the CA. Some partners reported that they did not cancel the agreement despite challenging relationships with the CA, which they may not have ordinarily done if the incentives were aligned differently. While some modifications to the monitoring approach in order to allow for context specific adaptations were appropriate, enforcement of minimum standards with due support from TI-S in determining when to disassociate would have been useful for piloting to ensure that the IPs can have a chance of success. It is widely recognised, for example, that in a best practice IP agreement, clear options should be set out in advance for disassociation from the process when a monitor is concerned that its integrity has been compromised too greatly. Some partners reported that they felt they lacked support from TI-S in determining when to disassociate. Enforced minimum standards should also cover timely provision of information, when to terminate due to irregularities, and frequency and detail of published monitoring reports. As mentioned previously, in the project under evaluation, the incentives were to continue engagement with CAs for the purpose of learning in the context of a pilot even in suboptimal conditions. In short, the ‘projectisation’ of the IP did not always result in optimal negotiation status for the monitors and there was an incentivisation to ‘complete the IP’. While one explanation given is that this project was a pilot to promote learning, in the context of learning for mainstreaming more consistency in key IP principles would have supported increased comparability between the cases.

The Monitoring System (Project MEL System)

The Project’s MEL system represented a challenge due to diversity and the multi-country nature of the project, as well as general difficulties with demonstrating the effectiveness of ‘preventative’ interventions such as this one. The evaluators find the MEL system was intended to serve various project stakeholders differently. For TI-S, the purpose was to harvest important information for knowledge management. For partners the intention was largely to help maintain oversight of the monitoring efforts and to inform some course corrections and adaptations.

The MEL System evolved and was revised over the course of the project. The original system was developed in-house by TI-S but was revised after concerns from implementing partners about practicality and usefulness. Due to a lack of capacity at TI-S to revise the system, an external MEL expert was engaged for the redesign. The MEL operational guidance to partners was updated in March 2019 following the findings from the MTLR. The revised MEL system comprised of the following approach:

1. Ongoing update of issue logs
2. Twice yearly summaries of specific KPIs in the narrative reports

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25 IP MEL Guidelines Operational Guidance March 2019
3. Annual change mapping exercise involving internal discussions by the monitoring team and also ideally external validation from the CA/companies whereby results, as well as the project’s contribution will be assessed and scored and lessons learnt reflected upon.

4. Annual overall change mapping meeting in which all project partners participate but which is led by TI-S.

5. Chapter calculation at mid-term and end-term report on the value of both KPIs and non-KPIs and provide narrative description as to why targets were not met.

6. TI-S assessment of the values for the project indicators, and creating aggregations for the overall project, at the mid and end-term.

As stated in the MEL guidance documents, the approach was intended to be flexible, include a combination of both qualitative and quantitative information, place an emphasis on learning, and be ‘necessary’ and ‘sufficient’. The evaluators note that the system incorporates several elements of best practice (such as outcome harvesting and participatory methods) and also makes use of the Impact Matrix which had been developed at TI-S shortly prior to the project, but this was one of the first projects of this size to implement it - a welcome addition for this project to add knowledge and value to the organisation as a whole.

**Mixed levels of usefulness of the monitoring data**

The evaluation found mixed views on the extent to which the MEL system supported the achievement of project goals and responded to the needs of the stakeholders. Some interviewees - both Project Staff and Implementing Partners - noted that the emphasis on the importance of MEL via this project was a very positive development for TI-S, noting that other projects have a low priority for this. A minority of implementing partners developed a keen interest in MEL and saw strong benefits, as one mentioned: “It helped me in the sense of channelling my thoughts into a constructive framework” (Implementing Partner). The Change Maps and Monitoring Logs specifically were considered by many as useful tools to uncover the context-specific changes which the monitors contributed to and the non-KPIs which were tailored to the local context were also found by some partners to have supported their monitoring or progress.

A majority of partners felt that the MEL system overall was too complicated and while they appreciated the support provided by TI-S, some felt the MEL demands were beyond their capacities. One implementing partner noted: “We found it very complicated to deal with – we couldn’t really understand all aspects. It was like playing a game to figure out steps and how to move to the next level!” Another partner noted the complexity in a comparative context: ‘I’ve been involved in at least 10 projects and none were so complex when it came to MEL. Some of the things we were supposed to evaluate and measure demanded professional expertise and capacities that we didn’t have.’ The lower levels of technical MEL capacities of some monitors may largely be due to the lack of foresight in the original guidance documents (such as “Guidance on and for the IP monitor - Setting up the

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26 The results of the yearly change mapping were presented and discussed during the yearly partners’ meetings. In Jan of 2019, partners and TI-S did not run the change mapping, reportedly because of uncertainty on the end date of the period.
Monitoring Team”) that monitors would need specific MEL capacities in their team to undertake the MEL reporting. Had guidance included such requirements for the team, monitors may have structured their teams differently and hired staff members who had the requisite skills. Turnover in staff within monitors was also found to be a factor contributing to confusion about the system. The evaluators find that while the complexity of the MEL system is largely due to the complexity of the project itself, opportunities for streamlining were missed.

The KPIs were generally found to have less specific value for the monitors themselves and contributed to a heavy reporting burden in addition to the other reporting requirements for the project. As one partner noted: ‘The MEL setup was too quantitative, too sophisticated. Attempts to put this quantitative scheme just doesn't make sense for a project like this’. While the MEL supporting documents state that the KPIs’ purpose are “summarizing and quantifying stakeholders’ overall responsiveness (as assessed by the IP monitor) to the recommendations, detected irregularities, and information requests” and were to be complemented by the other metrics, the usefulness of the quantitative measure was not always fully appreciated by partners. The evaluators found lower levels of integration of the KPI data into the project management system, suggesting that, while it was a noble attempt to bring comparability to a highly diverse and complex project, their power was not fully realised. One partner mentioned that the changes in the MEL system once the project was already underway was challenging, from the partners’ perspective. While there was some involvement of the partners in the development of and amendments to the new MEL system, TOC, and the partners drafted their own MEL plans, several partners wished for a more collaborative, participatory process for the later development and refinement of the MEL system but were unsure of when and where to raise concerns.

Some partners however, reported that they found it beneficial from their organisational perspective to specify one individual only as responsible for MEL reporting. This person needed to engage with those doing the monitoring for reporting purposes, the MEL lead was able to get a deep understanding of the requirements for reporting while not feeling overburdened with multiple responsibilities. Deeper reflection is needed on the ways of working which might allow partners to see the benefits of the MEL and reporting component, for example by facilitating real-time cross-partner learning, and to not merely see it as an administrative burden, as well as how to maintain MEL skills despite staff turnover. Additionally, guidance documents for setting up Monitoring Teams for projects which have large MEL components should specify that these skills will be needed by the team.

Limitations

The evaluation found that there was a mixed understanding between the implementers about how to count recommendations (which are used to report on some of the KPIs), which makes comparative analysis of the collected data challenging if not impossible.27 This is evidenced by internal monitoring

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27 The project team provided feedback to draft 1 of this report, saying that this was not fully accurate as the concept of key and non-key recommendations was introduced to increase comparability and foster a more meaningful interpretation of what it means that a certain % of recommendations is adequately responded to. In addition, the targets focus on %, and not on absolute numbers, which they noted as significantly improving comparability. This evaluation team disagrees and feels that some level of centralised quality control and more
data which shows wide variation in the total number of recommendations generated, as reported by partners: one partner reported generating a total of 6 recommendations for an IP, while another reported generating 94 recommendations in total for their IP. This points to a lack of common definition of what constitutes a ‘recommendation’.

Another limitation was reported by two partners, who questioned the emphasis on recording recommendations/irregularities, as the need for these are driven by the level of capacity and technical skills at the CA, rather than reflecting effectiveness of the monitor. It was also noted as being contrary to the core aspect of an IP as being preventative and CAs agreeing to follow best practice. Indeed, the guidance documents themselves specify that, because of the lack of ability of monitors to control responsiveness of stakeholders to recommendations, irregularities and information requests, the KPIs are not measures of the effectiveness of the monitor.

The evaluation finds that a timely centralised performance assessment of the monitors was missing but would have been beneficial and could have been used by the project manager to aggregate and summarise the work of the monitors and report to the donor. Additionally, it would be useful to assess monitoring results (KPIs/Change Maps) with more disaggregated tracking at the level of the monitored procurement processes/contracts which would allow for disaggregated analysis of factors hindering or supporting progress. The data reporting requirements would need to be simple in order to be workable.

The engagement of an external MEL expert in Year 2 of the project was necessary and well-needed given the lack of capacity at TI-S to develop and support the roll-out of an MEL system for such a large scale and complex project as this. The consultant was engaged for 35 days over the lifetime of the project varying in intensity from year to year which - given the number of partners and heavy focus of the project’s objectives on learning - is considered by the evaluation team as highly insufficient. A dedicated staff position would have been justified given the scale of the MEL component and would have been beneficial to provide consistent support to implementing partners on the monitoring system, for quality control of collected data, better integration of the learnings into the project planning cycle and donor reports (which was challenged due to the staffing gap in the Policy Coordinator role, greater sustainability of the MEL learnings developed via project and greater coordination with data collection for TI-S’ knowledge products (such as the 10 Impact Case Studies) to avoid duplication of efforts. Given some implementing partners had limited prior expertise with MEL research collection, some noted during interviews that a greater role from TI-S could have lessened the burden on the partners but still allowed TI-S to get the information needed to draw lessons and report to the donor on progress. Additionally, as previously noted, specifying the need for an MEL detailed guidance should have been provided to help monitors establish a common understanding of what counts as a recommendation. We do note that some guidance was provided but from our analysis of the data we note there were clear differences from some monitors.

28 Source: TI’s Internal Monitoring Data Airtable: Monitoring Summary - Recommendations
29 Latest project budget figures, provided to the Evaluators by TI-S.
staff position within the partner organisations would have been beneficial to help ensure expectations aligned.

**Theory of Change**

While a ToC was crafted for the individual IP level, a project-wide ToC was missing, including the roles of TI-S, TI-EU and other potential partners at the broader level. The ToC was intended to be exploratory and to present a range of possible outcomes which an IP could but not necessarily would contribute to. It reflects the 14 outcomes which have been reported on in the later section on effectiveness and impact. While the inclusion of the visualisation is useful for summarising the key potential outcomes, further reflections on pathways for change based on the circumstances the monitors find themselves in (i.e. risk level) may be beneficial as well as stating activities undertaken to move from short-term to intermediate level. Given the ToC listed all possible short-term and intermediate outcomes (as noted due to its exploratory approach), some partners felt the ToC gave an overly ambitious level of expectation to the project, which they felt given their experiences on the project warranted a more conservative level of expectation. While the ToC was meant to be a living document, it was not comprehensively revised in the later stages of the project, which may have allowed for partners to reflect their experiences.

The Project has a ToC for the IPs which was originally produced in-house by TI-S. The first revision of the ToC was done by the MEL expert (diagram only, complementing the existing narrative document) and based on the recommendations of the MTLR additional text was added to the narrative. The “IP MEL Guidelines Background Material March 2019” specifies that the ToC was designed to reflect the variation in approach taken by implementing partners, various pathways for change (including non-linear) and that various outcomes are related to one another. It also states that it was designed to reflect the bottom-up approach that the project took by allowing partners the flexibility to adapt their approach based on the local context.

The ToC visualisation (see Annex 1) identified 14 potential outcomes which include both policy/institutional change and behavioural change. They are grouped into ‘short-term outcomes’ (which relate to changes among engaged groups for the monitored project - the targeted CA, the bidder, engaged communities and targeted media) and ‘intermediate outcomes’ (which relate to changes beyond the specific monitored project to policy level change in public procurement such as policy and wider behavioural change).

There was a lack of clarity among some implementing partners regarding whether they were expected to contribute to all short-term and intermediate outcomes, even at the time of this evaluation (despite MEL planning documents and workshops/meetings specifying that this was not the case). Some therefore felt that the expected impacts were overly ambitious for a pilot project. As one monitor said: ‘the expected impacts were insanely ambitious for a pilot. Through the monitoring of one particular project (not a particularly big project) it was way too ambitious to expect to have behavioural change at the CA, systemic changes in the PP system, expecting citizens to get more engaged. The KPIs are crazy for a pilot. If you just judged from that list, it is not appropriate for a pilot.’ The Evaluators note that this is another
example of the need for a common understanding of the purpose and goal of the project (both for IPs and the project overall) across all levels of project and among all key stakeholder groups.

The evaluation found that the lack of an overall ToC for the project was a missing piece in the project documentation. A holistic ToC would show:

- The logical pathways for change that the work of the 18 IPs would contribute to collectively (i.e. the development of knowledge on how IPs can be mainstreamed and regional advocacy work);
- The roles of TI-S and the TI-EU office and how their functions (particularly around capacity building, communications and advocacy) would support project achievements - both for the individual IPs and for the project overall.

The narrative ToC for the IPs would benefit from further elaboration on how the IPs would address the various forms of corruption listed. Contextual information on the corruption/integrity risks for EU-funded procurement projects would also be beneficial, supported with evidence on the scale of the problem (including a reflection on country differences between the EU member states/project countries). The pathways for change from the short-term to the intermediate term could be further refined to detail the types of activities which would lead the monitoring of the single IP project to contributing to more systemic changes. Indeed, given reflections from the partners, some potential outcomes are considered overly ambitious for a single IP and future projects should reflect on whether they are appropriate for the TOC - for example, increasing trust with citizens should only be hoped for following real, genuine, and long-term demonstrated commitment for change from the CAs and companies. Given learnings from the 18 IPs, a revision to the TOC to reflect the different models of IPs (or different risk-contexts they may occur in) would be appropriate, and it is suggested to include a pathway for change for IPs which are cancelled and terminated due to non-compliance, corruption issues found as these are also an example of “success”.

The TOC should also consider greater emphasis on the theory behind IPs that they are specifically intended, under certain circumstances, to change the behaviour of the parties involved due to Game Theory. This aspect delineates the tool from other forms of civic monitoring. This central aspect of IPs was not found to have sufficient visibility in the TOC.

**Mid-term Learning Review (MTLR)**

The MTLR was undertaken by ODS from August to November 2018, which resulted in a MTLR report which was published in March 2019. Transparency International provided a written response to the evaluation which was published in May 2020, which gave a detailed response to each of 14 recommendations to arise from the MTLR. The responses were drafted with the engagement of the partners in November 2019.

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31 [www.odsupport.eu](http://www.odsupport.eu)
Learning and Adjusting

This end of project evaluation found evidence that the project team made several important adjustments following the recommendations of the MTLR. These included the hiring of staff members to fill critical gaps in public procurement expertise and additional staffing for communications, the focus on knowledge product/resource creation on IPs, outreach, and communications about IPs to support advocacy, and ongoing support for continued engagement opportunities between implementing partners despite the challenges caused by COVID-19. These were notable and important adjustments which helped support the achievement of project goals.

While the MTLR emphasised the need for greater outreach with affected communities, not only was this majorly hampered by COVID-19, but a key learning from this project was that for several of the selected procurement processes to be monitored, the engagement of communities would be inappropriate or incredibly challenging (see later section on “Effectiveness” for further details).

The MTLR noted that the ToC needed further elaboration of linear and non-linear causes and effects between outputs, and short term and intermediate outcomes. The project team did respond to this by updating the TOC pathways. The MTLR however, mistakenly considering the current evaluation, did not point out important shortcomings of the ToC such as it only addressing the monitor level and not including any reference to cross-national and regional advocacy and the roles of TI-S and TI-EU.

Regarding the MTLR finding of lack of engagement in the IP process by the CAs and bidders, TI-S responded that caution is needed when CAs and companies are only engaged for the reputational benefit alone. The MTLR noted that they found few indications of systemic change, this was to be expected for the mid-term of the project given the initial delays to the start of work and the high levels of ambition which partners could adopt for the work. It also called for a deeper assessment of costs by TI-S and partners, however, the project faced challenges with calculating the fixed costs for monitoring given that the financial reporting templates and timesheets did not allow for disaggregation purely for monitoring activities alone.

This evaluation, like the MTLR, found gaps in senior-leadership support for the project specifically in the area of policy and advocacy. While the management response to the MTLR noted that a member of the Senior Management team would be engaged in the project, that person left soon after and the key function of Head of Policy and Advocacy was left unfilled for 21 months (with two interim positions during this time). From September 2021 to March 2022, the head of the Global Movement department filled the Strategic Advisor position in the project, although he was not substantially involved in external advocacy related to the project. Indeed, in a related point, the MTLR called for a greater focus on advocacy at all levels of decision-making, including at the EU level. The EU level received increased attention in this regard (for example, advocacy vis-a-vis DG REGIO and SG RECOVER focused on inclusion of the IP into key future EU investments) but overall, the evaluation finds insufficient attention was placed on regional and international advocacy (see Coherence section below). The

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33 See IP MEL Guidelines Background Material March 2019
34 In feedback on a draft version of this report, the project team emphasised that international advocacy was not a primary target of the project and that regional (EU) advocacy was the focus. The evaluation team noted that
The evaluation found that at the outset of the project, the TI-S team showed clear intentions to integrate the IP project into a broader vision for ‘Clean Contracting’ at TI and built some momentum in forging partnerships and cohering with external initiatives on open and clean contracting. At the national level, throughout the project, there were several promising examples of partners exploring and building new advocacy partnerships, some of which were also initiated and/or supported by TI-S. Overall though, the evaluation concludes that, at the regional and international levels, the project did not manage to sufficiently maintain external partnerships to ensure their sustainability. This was found to be due to low level of engagement from TI senior management, a minimal role for TI-EU in the project, high staff turnover and delays in recruiting for several key roles, a project management team who were overburdened and focused on delivering many outputs and operational tasks and the absence of an experienced advocacy lead as part of the team from October 2020 onwards. The inclusion of the public procurement priority in the TI 2020-2030 Strategy is promising and shows the issue remains high on TI’s agenda.

External Partnerships and Advocacy

The DoA foresaw a focus on regional, country-level and local advocacy, however the bi-annual progress reports sent to the donor contained individual sections on EU-level advocacy (4.1), global level advocacy (4.2), and country-level advocacy (4.3), stating clearly: ‘drawing on lessons emerging from the IP project, advocacy work is conducted on three dimensions, at the national level, EU level and at the global level’ indicating due recognition of the importance of addressing all levels of decision-making, including at the global level. It was recognised that much of this advocacy would need to be coordinated in partnership with other organisations in order to be effective. At the outset of the project, under the Senior Project Lead, significant efforts were made to bring TI more prominently into the ‘open and clean contracting’ space and to engage in partnerships with other

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36 See Technical Reports to the Donor #1 to #11.
37 The Senior Project Lead’s role changed in 2017 to Strategic Advisor, who remained active on international advocacy related to the project.
organisations active in the field. There was particular emphasis on bringing the IP ‘up-to-date’ and linking up with organisations working on open data with a view to forging ties between open data and procurement risk as part of a broader clean and open contracting agenda. It is notable that the IP project was referred to in internal documentation at this earlier stage as TI’s ‘Clean Contracting Initiative’, signalling a broader framing and an intention to connect the project to other contracting transparency initiatives within TI and beyond.38

Forming strong partnerships was thus a key part of the initial vision to realise the project’s advocacy potential40, as seen in the commitment to establish an advisory committee41 (also included in the DoA) which was slated to include representatives from international civil society advancing best practice standards and mechanisms for open contracting (e.g. OCP, CoST), an internationally-recognized public sector procurement expert, a private sector champion, an expert in leveraging open data in public procurement (e.g. Digiwhist) and an expert in generating citizen engagement.42 The foreseen advisory committee was established in 2017. The stated purpose of this committee was to:

- Provide strategic input in terms of how the project including its MEL framework and revised Integrity Pact approach should evolve based on project reporting.
- Support and help build linkages between the project and other key actors and initiatives in open contracting at the national and international level.
- Provide specific input on ad-hoc issues related to the Advisory Committee’s priorities as they arise.43

The committee was convened but held just two formal meetings during the project’s lifetime (in August 2017 and March 201844) with 3 external participants (OCP, Bloomberg Associates and CoST) and team members from TI-S. The current TI-S team attributed the committee’s dormancy to high staff turnover at TI-S, especially at project leadership level, and a need to prioritise other more operational, urgent issues and thereby deprioritise the advisory committee. While not considered internally as a major shortcoming of the project, this evaluation finds that the failure to fully activate and make use of this advisory body was both a sign of, as well as a contributing factor to, an absence of strong strategic vision and oversight of the project. This advisory committee could have performed a strategic positioning role and its absence, along with lack of attention and support to the project from senior management at TI-S, can be seen as limiting the impact of the project, particularly when

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38 It is not clear when this language was dropped and whether this happened by design or by accident. The evaluation noted that the project is mostly simply referred to as the ‘IP Project’ now.
39 In the materials and reporting from the second half of the project, this language is less noticeable and there is a narrower focus on the IP tool itself removed from this broader framing.
40 This was reflected in early documentation and donor reporting and confirmed with external interviewees.
41 See DoA p. 8.
42 See Clean Contracting Project Advisory Committee Terms of Reference
43 Clean Contracting Project Advisory Committee Terms of Reference
44 No minutes of the March 2018 meeting were made available to the evaluators but this meeting is mentioned in the Technical Report to donor (#8).
it came to accessing and utilising EU-level and global advocacy spaces and translating outcomes from the individual IPs into more systemic change.

The evaluators note a similar pattern in other areas of coordinated advocacy. There was, for example, momentum early on in the project, in developing an international coalition of like-minded organisations, including CoST – the Infrastructure Transparency Initiative, Open Contracting Partnership (OCP), Hivos and Article19. The targeting of these organisations was appropriate and forging strong partnerships with them was likely to support the project’s objectives. The zenith of this cooperation was the launch of the Clean Contracting Manifesto in November 2017, for which the team advocated strongly. There was also clear evidence of consistent outreach, at that early stage, in important strategic fora such as ensuring the profiling of the project and TI’s work on clean contracting at OGP, OECD, G20 and G7 meetings from 2016-2019. During the G20 Summit in Osaka in 2019, for example, a G20 Compendium of Good Practices for Promoting Integrity and Transparency in Infrastructure Development was published, which featured IPs as an effective collaborative approach to assessing and mitigating the risk of corruption in infrastructure development.

However, this momentum on partnerships and advocacy was not sustained by TI-S in the latter part of the project due to a project team with many competing responsibilities, a focus on outputs and inconsistent senior management engagement with the project. This was compounded by the pandemic which put face-to-face advocacy on hold for most of 2020 and 2021. The evaluators noted from the progress reports that there were far fewer examples of external outreach to the above-mentioned and other organisations in the field from 2019 onwards. One external interviewee also noted that there were several ‘underexplored potential collaborations’ by TI. A case in point is that, in the donor reporting from 2019 to present (Technical Reports #8–#11), there was no further mention of the Clean Contracting Manifesto. It is an example of a promising advocacy initiative which was not brought to maturity due to staff changes at TI-S when the original Senior Project Lead/Strategic Advisor left the organisation in July 2020.

This is not to suggest that no partnerships were built or that no regional or global advocacy was undertaken during this latter period, and TI-EU also stepped into this role in specific cases (see below).

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45 See Technical Reports to the Donor, in particular Reports 2 (March 2017) through to Report 8 (March 2019).
47 The project team attributed this down-tick in engagement with other organisations to a focus on regional (EU) advocacy and to the fact that they did not consider international advocacy as an important aspect of the project, as well as to the fact that the team had many responsibilities and this was not always a priority.
48 The Senior Project Leader moved into a ‘Strategic Advisor’ role for the project in October 2017 and held this role until leaving the organisation in July 2020. This strategic advisor role was then filled by a member of the senior management team, who was reportedly engaged but extremely busy with other projects and internal restructuring issues at TI-S. When that member of the senior management team resigned in October 2020, this oversight role was filled by various senior management members but evolved from being substantive strategic oversight into a ‘functional oversight’ role. This change was verified by internal and external interviewees. At the end of the project there was some support on donor relations and future fundraising for IPs from the strategic advisor.
Examples of TI-S led regional/global advocacy included engagement with the Basel Institute on Governance to highlight IPs in the B20 Collective Action Hub, which helped support greater awareness of the tool; engagement with UN Global Compact; and advocacy vis-a-vis the B20 group. The project team reported further engagement with CoST but sustaining the partnership proved challenging, in part due to lack of separate donor funding. As an internal stakeholder noted: ‘We had a good conversation at the partners’ meeting with CoST on the synergies with the open data standard. TI-S then facilitated a collaboration with Poland, Latvia and Italian partners with CoST. However, in the end, it was promising but it never really matured.’

Some interviewees (both internal and external) did reflect that they have seen an increased awareness of IPs over the course of the project, and attribute it to the work of TI. Evidence of increased awareness of the tool include its receipt of the European Ombudsman’s Award for Good Administration 2019 for “Excellence in open administration”, inclusion in a special G20 Compendium as a global good practice for promoting integrity and transparency in infrastructure development, and recognition in the Stanford Social Innovation Review, as well as interviewees reporting references to IPs by rapporteurs in European Parliament discussions. These point to good outcomes in the areas of greater awareness of the tool and should continue to be built upon.

National partnerships and collaborations

In the face of the pandemic, the evaluation found that the project partners and particularly TI-EU did make efforts to integrate the IP project with COVID procurement debates and the safeguarding of EU funds delivered through the EU Recovery Fund. TI-S was an active partner in these endeavours. Of particular note is the joint open letter co-signed by 27 civil society organisations, comprised of almost all project partners and other TI National Chapters in Europe, addressed to the EU institutions and Chancellor Angela Merkel (as representative of the rotating Council Presidency) and advocating for open, participatory and effective oversight, that safeguards the EU recovery funds from fraud and corruption. This was a well-coordinated timely advocacy initiative, but it is unfortunate, and noted by an interviewee, that an invitation to sign was not extended to other external organisations operating in the space, which would have made the effort potentially more powerful.

The evaluation found other promising examples of partners exploring and building new advocacy partnerships during the project. For example, TI Portugal collaborated with OCP on open data related to COVID procurements and a potential hybrid model with the Open Contracting Data Standard. TI Lithuania, TI Portugal and TI EU are also actively participating in the EU Open Spending Coalition, a coalition of NGOs advocating at the national and EU levels to advance the principles of openness in spending of funds, procurement, and company ownership within the EU. This appears to be a strong and dynamic initiative which TI-S and other partners should consider joining. In Romania and Italy,

51 https://www.open-spending.eu
52 At the time of writing, TI-S were reportedly in the process of joining this coalition.
where there were multiple partners engaged on IPs, the potential for in-country coherence and collaboration was strong. In Romania, there was one monitoring partnership (TI-Romania and IPP, which worked well) and this monitor conducted coordinated national advocacy with the other Romanian monitor (RAI). They admittedly could have been more proactive in sharing amongst each other more information and knowledge on the actual monitoring. Likewise, the three Italian partners collaborated well on advocacy and communications and also forged partnerships with other like-minded organisations such as Parliament Watch Italy in the country (which was noted by one external interviewee as a best practice of civil society cooperation) and an observatory committee for the Recovery and Resilience Fund.53

Many partners used the OGP platform as a space to advocate for systemic changes, including in Greece, Italy, Latvia and Portugal. In Greece, nine civil society organisations addressed a letter to the Minister of State and Digital Governance {14/4/2021} expressing concern about the fact that Greece has failed to meet the standards of public participation in the design of the 4th National Action Plan for Open Government and the fact that Greece was placed under review by the OGP Criteria & Standards Subcommittee (C&S).

**Internal Coherence at TI**

Internally at Transparency International, the inclusion of public procurement & civic monitoring as a programmatic priority in the newly adopted strategy ‘Holding Power to Account – A Global Strategy Against Corruption 2021-2030’54 is a sign of internal coherence and continued recognition of the importance of the issue and the project within TI, which is a good sign for the future of IPs and Clean Contracting at TI. It remains to be seen how this is translated in the implementation of the Strategy, however a new TI project ‘Bolstering Integrity in Public Contracting: A Reinvigorated Approach and Coalition on Integrity Pacts’ funded by the Siemens Integrity Initiative55 will be an important continuation and opportunity to embed the learnings from this pilot.

4. Efficiency56

- To what extent was the Project implemented in an economically justifiable and timely way?

The evaluation found that budgetary resources, at TI-S, TI EU and partner level, were generally sufficient to implement the project as planned and the finances were well-managed, although the way the budget was structured was unhelpful for analysis of the costs of the IP. More or specific resources for TI EU could have strengthened their contribution to the project, and would have likely been beneficial, especially regarding increasing potential for regional and international advocacy impact. The evaluation faced limitations in assessing the cost-benefit of the project, but regarding value-for-


55 The project focuses on Argentina, Romania and Spain

56 The evaluators examined the financial statements and reports submitted to the donor throughout the 6 years of the project, as well as the projected end-of-project financial report, though not finalised at the time of the evaluation as the project was not yet closed, nor audited.
money, it found indicative evidence that the costs of the monitoring and associated activities could be considered proportional and justifiable against the overall financial values of the projects being monitored, however there were notable exceptions in this regard. The high turnover of staff at TI-S had a downstream impact and led to some inefficiencies. The original timeline was found to be grossly over-ambitious given the predictable delays that the partners encountered in procurement processes and even with the extensions, there were challenges to meet the timeline.

**Sufficiency of Resourcing**

The project was implemented with a total budget of €8.838.200,00, 100% funded by DG REGIO. The budget was distributed between the project coordinator (TI-S), TI-EU and the 14 project partners, as visualised below.

**Figure 5: Chart showing breakdown of costs (%) per partner in the Consolidated Project Budget (TI-S, TI EU and Partner combined)**

![Chart showing breakdown of costs (%) per partner](image)

*Source: Draft end-of-project financial report - Consolidated (TI-S & Implementing Partners)*

Given the complexity of the project and the importance of the monitoring, evaluation and learning component, the allocation of 27% to the coordinating body of TI-S is found to be justified. The TI-EU office had a limited role in the project, as demonstrated by the budget allocation (5%). Interviewees from various stakeholder groups reported that this was a missed opportunity, given the EU office’s expert knowledge of how the EU institutions work, and the scope of their role could have been expanded to bolster the regional and international advocacy elements of the project. Notwithstanding their limited role, both internal and external stakeholders appreciated the red flags project and saw it as a positive addition to the project and a good use of funds.

By the time of evaluation, the project was projecting an underspend of €148,000, which represents 1.5% of the overall budget. Given the number of partners involved, this is not a significant underspend.
The underspend at TI-S (€30,681) was mostly driven by underspent staff costs, attributable to gaps in staffing at various points during the project. The remainder of the underspend is attributed to leftover budget at the partners’ level across a range of categories, but most commonly under ‘other eligible costs’ where travel and events are listed. It is quite likely that much of the underspend is attributable to cancelled travel and events due to the pandemic.

The majority of the budget (75%) was allocated to human resources, which is not surprising given that the main resources required for effective IP implementation were indeed human resources. Project partners in general found their budgets to be sufficient.

**Figure 6: Chart showing Breakdown of costs by type in the Consolidated Project Budget (TI-S, TI EU and Partners combined)**

Source: Draft end-of-project financial report - Consolidated (TI-S & Implementing Partners)

**Value for Money of the IP project**

The appropriate cost of running an IP varies from country to country and from sector to sector, depending on the implementation arrangements, the activities included in the process and the complexity of bidding procedures. Because of the structure of the budgets and financial reporting in the IP EU project (more details below under Financial Monitoring and Reporting System), it was not feasible for the evaluators to isolate and extract the cost of the actual monitoring activities. By mapping the partners’ budgets against the full financial value of the projects being monitored, we can however get a sense of the sums and proportions involved (although the findings are only indicative given the challenges with analysing the implementing budgets which are described in further detail below in ‘Financial Monitoring and Reporting System’). As demonstrated in Figure 7 below, in a majority of cases, the costs of the implementing partners represented a small percentage compared
with the overall financial values of the projects being monitored. The evaluators interpret this as an indication that generally the IPs represented value-for-money. It is important to note that the partners’ budgets included not only IP monitoring, but also financing for national advocacy, communications and MEL components of the project (including meetings and events for this pilot) - which to a certain extent may not necessarily be needed for a model IP implemented outside of this pilot exercise.

**Figure 7: Table showing partners’ overall project budgets as a proportion of monitored project’s value.**

<table>
<thead>
<tr>
<th>Monitored Project(s)</th>
<th>IP Project Partner Budget</th>
<th>Monitored Project Value</th>
<th>Proportion IP budget /Total monitored project value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rehabilitation of Archaeological Site Sybaris (Acton Aid Italy)</td>
<td>€506,538</td>
<td>€2,000,000</td>
<td>25%</td>
</tr>
<tr>
<td>Resilient Madonie: Education and Energy projects (Amapola, Italy)</td>
<td>€423,720</td>
<td>€14,155,044</td>
<td>0.003%</td>
</tr>
<tr>
<td>Cadastre of Rural Areas, E-catalogue of Schools and Digital Library (TI Romania, IPP)</td>
<td>€694,965</td>
<td>€357,691,155 (3 projects)</td>
<td>0.2%</td>
</tr>
<tr>
<td>Technical Assistance (Romanian Academic Society, Romania)</td>
<td>€366,903</td>
<td>€1,600,000</td>
<td>23%</td>
</tr>
<tr>
<td>Modernisation of Railway Line #1 (SBF, Poland)</td>
<td>€390,229</td>
<td>€140,700,000</td>
<td>0.3%</td>
</tr>
<tr>
<td>Zheleznitsa Tunnel in the Struma Motorway (TI Bulgaria)</td>
<td>€406,065</td>
<td>€127,822,970</td>
<td>0.3%</td>
</tr>
<tr>
<td>Technical supervision services for the operation of the MS2014+ Information System (TI Czechia)</td>
<td>€139,849</td>
<td>€166,632</td>
<td>84%</td>
</tr>
<tr>
<td>Flood Protection Pipeline in the Municipalities (TI Greece)</td>
<td>€318,325</td>
<td>€12,610,800</td>
<td>0.3%</td>
</tr>
<tr>
<td>Construction of a flood reservoir for the rivers Tisza-Tur; M6 motorway between Bolyaivarda and the country border with Croatia (TI Hungary)</td>
<td>€649,983</td>
<td>€249,000,000 (2 projects)</td>
<td>0.3%</td>
</tr>
<tr>
<td>Light Rail Cagliari; Technical assistance to the European Social Fund 2014-2020 in Lombardy (TI Italy)</td>
<td>€468,553</td>
<td>€25,500,355 (2 projects)</td>
<td>2%</td>
</tr>
<tr>
<td>Riga tram (TI Latvia)</td>
<td>€340,260</td>
<td>€97,400,000</td>
<td>0.3%</td>
</tr>
<tr>
<td>Revitalisation of the Neris Riverbank in Vilnius (TI Lithuania)</td>
<td>€471,870</td>
<td>€15,100,000</td>
<td>3%</td>
</tr>
<tr>
<td>Conservation and Restoration of Alcobaça Monastery (TI Portugal)</td>
<td>€413,662</td>
<td>€1,100,000</td>
<td>38%</td>
</tr>
<tr>
<td>Renovation of energy systems of 2 hospitals (TI Slovenia)</td>
<td>€587,430</td>
<td>€3,800,000</td>
<td>15%</td>
</tr>
</tbody>
</table>

*Source: Draft end-of-project Financial Report and Internal Project Monitoring Data (Airtable)*

Notwithstanding this, the evaluators did note that, in one case, the cost of implementing the IP project (~140K) represented 84% of the total financial value of the contracts being monitored (~167K), bearing in mind that the partner’s budget included other elements such as advocacy and learning. While an extreme example, the evaluators question whether this was a good candidate for an IP and posit that

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57 The financial value of the projects being monitored was not within the control of TI-S or the partners, as the selection process was donor-driven, as detailed earlier in this report. The reasoning offered by the donor for the inclusion of low-value projects in the pilot was to experiment and generate lessons learned from a wide array of projects, varying in sector and size.
this represents an example of the cascading effect of the inappropriate selection process for the project. The evaluators are fully aware that financial value should not be considered in isolation as a criterion for IP project selection. There are arguments to be made, from an advocacy point of view, to justify carrying out an IP for a financially small procurement project - if it was, for example, a flagship project of strategic importance in the national or local context and/or if it was useful for building momentum in a wider anti-corruption drive. This was not the case in the example under consideration, which was apparently chosen because of the specific sector involved. A member of the project team found its inclusion justifiable for learning purposes, given the pilot nature of the project. However, several implementing partners and two project team members reflected that it was an inappropriate selection and that it showed the importance of taking the size of the procurement project into consideration when selecting them for IPs. As one member of the project team noted: ‘If the monitoring costs end up being half of the value of the project, then it’s not worth it.’ In the final analysis, the evaluators conclude that it is difficult to justify this particular civic monitoring project, the implementation of which cost almost as much as the value of the procurements being monitored. This is not to dismiss the side benefits such as the learning and capacity development of the partner in question, which certainly did occur, but could have been achieved by other less costly means. In addition to the negative cost-benefit, the message it conveys in terms of optics and communications, is not supportive of an anti-corruption agenda.

In three other cases, the implementing partners’ budgets exceeded 20% of the total value of the contracts being monitored. In two of these three cases, (the Archaeological site Sybaris, monitored by ActionAid Italy and Alcobaca Monastery renovation, monitored by TI Portugal), the projects can be seen to be of strategic importance (despite their relatively low budgets), as they take place in important sectors for the countries (culture and heritage) and in areas which are underfinanced. For the sectors concerned, they represent ‘big’ projects. The issues above stem from project selection and point again to the need for clear and justifiable selection criteria for IPs to be applied.

**Financial Monitoring and Reporting System**

The consolidated budget, and individual partner budgets, were organised as activity-based grant budgets, as would be expected given it is a donor-funded project, however, this caused challenges in the context of the pilot. For example, because of the structure of the budgets and financial reporting, it is not possible to extract the cost of the actual monitoring activities. It is also difficult to extract the cost of the learning component. Partners’ staff costs are listed as line items, but an individual staff member’s time was in practice split between project management, compliance costs for the EU-funded project, monitoring, MEL, advocacy, communications and related activities. It is therefore not possible to extract the cost of IP monitoring via analysis of the financial reporting. Another clear example is found with partners who were carrying out more than one IP: the financial reporting does not provide a breakdown of costs per IP - nor procurement processes or contracts monitored - but only by project partner. This poses a significant challenge for evaluating the efficiency of individual IPs.
Staffing & Capacities

As has been noted already, there was a high turnover of staff in the project team at TI-S, as well as several restructurings of TI-S, including the organisation being overseen by three different Managing Directors during the project’s lifetime. While partners recognised that the current team is extremely hard-working and dedicated, the fluctuations in staff at TI-S had knock-on effects and partners felt the gaps in staffing at certain moments. Partners generally did appreciate the important role of TI-S in coordinating and gathering information and collating it to extract lessons learned across a range of projects. However, they also mentioned incidents where the support from TI-S suffered due to staff turnover. One partner reported requesting help for adapting the IP legal template to their national context but the request went unanswered and resulted in a weaker IP legal agreement in that context. Several partners emphasised the need for greater consultation of partners, when it came to the agenda and format of partner events, and more space for informal learning and knowledge exchange.

Partners reflected that the entire reporting requirements for the project (including the MEL data collection and collation, financial reporting and timesheets) collectively created a heavy burden upon them, as mentioned previously. As one partner noted: ‘We struggled with the reporting, it was very heavy. There were always lots of reports to submit, excels, lots of tools where we had to keep adding the same information over and over’. On this note, some implementing partners were more appropriately staffed than others. Greater support should have been given to the budget planning and staffing planning of the implementing partners to make sure they had sufficient capacities across all the competencies needed for the project, but particularly for the MEL data collection. The engagement of an external MEL expert by TI-S was necessary and the right decision given the capacity challenges at the Secretariat, however, they were booked for a limited number of days. A staff position would have been justified given the large number of projects, the support needs of the implementing partners, the extent of the learning element and to improve the quality and comparability of the collected data.

The last two years have been much more stable, allowing TI-S to make a substantial push on the learning objectives in particular and to provide consistent support to the partners, particularly in the area of communications, which had been lacking at the start of the project. The evaluation thus finds that the changes in the TI-S team profile in the second half of the project brought improvements in the areas of project management, communications and support to national partners but reduced the regional and international advocacy impact of the project, as there was no dedicated senior advocacy lead to replace the Senior Project Leader/Strategic Advisor who led the advocacy work from 2016-2018. This gap could have been filled by TI-S senior management supporting the project more proactively and carrying its messaging into global fora but the evaluators found no evidence of that, or by TI EU if their role in the project had been expanded.

Timelines

In general, the projected timeline for the project was over-ambitious. The project partners encountered many delays, which were largely outside their control and due to the unpredictability of public procurement processes, lengthy bureaucratic processes on the part of public authorities and the COVID-19 pandemic. An external expert echoed the views of one partner who stated that IPs are
simply not suited for a multi-country project. The diversity of project timelines and high likelihood of delays posed serious challenges for projectising the IP, and particularly setting it up as a multi-country project. The major extension of the project granted by the donor in 2019 was found to be necessary to ensure completion and to allow sufficient time for learnings to be extracted from the pilot.

Some internal timelines related to events were also unrealistic. Regarding events, partners noted communications ‘inefficiencies’, which were attributed to the large number of stakeholders involved and a very engaged donor. This was evident around the final conference. Some stakeholders felt they were not adequately involved in the design of the agenda for the conference, details of the conference came very late from TI-EU, and technical issues during the conference may have been addressed ahead of time via better planning. From some stakeholders’ perspectives, this was reportedly due to slow or delayed sign-offs from the donor, however, review time by the donor could have been anticipated in advance given knowledge of how the EU institutions and bodies function and better communication would have facilitated sufficient time being allocated.

5. Effectiveness

- How effective was the project in supporting the achievement of the three specific objectives, and 6 related short-term outcomes?
- To what extent did the interventions lead to any cost savings?
- What are the main internal and external factors which have played a role in the achievement or non-achievement of the project goals, objectives and results?

The evaluation sought to explore both how effective the IP EU project was at achieving the three specific objectives and also how effective the implementing partners were at contributing to the 6 short-term objectives. The project achieved success in delivering on most planned activities and outputs specified in the DOA for the three specific objectives. In terms of the changes that these activities contributed to, the evaluation finds mixed levels of success. Integrity and accountability was supported via the monitoring of the projects, but the specific objective provides an overly ambitious level of achievement which was not reached by the project. The project did improve transparency of the procurement projects via communications and events, but some monitors did not publish monitoring reports frequently to support this aspect of the work. Lessons from the pilot and knowledge generated have been high and are reflected in numerous knowledge products, but given they came at the end of the project their impact should be assessed at a later stage. Results on the 6 short-term outcomes were mixed with some showing higher levels of achievement than others. Factors which helped achievement includes good initial buy-in from the CA, willingness of CA to respond to issues found, timely provision of information to monitors, a strong IP agreement and a project which is of strong national or local interest. Key factors which were found to have hindered IP achievements include various challenges with the original selection of the project which did not have the buy-in of the CA, staff turnover at the CAs, CAs who already had very good and robust systems in place, weak IP agreements and slow provision of information.
Information Sources

The evaluation notes that, on the IP level, a considerable amount of valuable and rich data was collected over the course of the project and was reported on by partners via the MEL system (see previous section on ‘Pilot Project Design for further details). The system developed saw partners reporting quantitatively using the KPI system, qualitatively using the change mapping exercise, reporting additionally on non-KPIs (which mostly reflect the 6 short-term outcomes) using an approach which was determined individually by each partner, and also via narrative reports and providing full monitoring logs and how they have been followed up on. Given this evaluation began in December 2021, many partners were still collecting final data to report on their end of project results during the evaluation fieldwork. While some further monitoring data was provided to the evaluators at the end of the evaluation fieldwork period, at the time of writing, the evaluators did not have access to the final narrative reports from the partners,\(^{58}\) final monitoring logs, nor the results from the country specific non-KPIs. These documents were noted by a member of the project team as key sources of information for effectiveness, and so results presented here on effectiveness should be considered partial and potentially do not account for all examples of effectiveness - although the evaluators feel the most significant examples are well reflected. A key source for the evaluation’s analysis of effectiveness is the project team’s aggregation of the IP results against the possible outcomes. The project team has compiled both KPI and change map data from the partners in order to provide an overview on what results have been found. This compilation was provided on the 25th March. This data was triangulated with interview testimonies with implementing partners, project staff and other stakeholders, and analysis of project documents available at the time.

Specific Objectives

According to the Description of Action, the project had the following 3 Specific Objectives, with the corresponding activities specified as:

**Specific Objective 1: Ensure integrity and accountability in 18 projects co-financed by EU Structural and Cohesion Funds** - achieved via the monitoring of the tendering, contract awarding and execution phases, the engagement of citizens in monitoring activities, the raising of irregularity when they occur and dialogue with government and the bidders.

**Specific Objective 2: Ensure transparency and access to information in 18 projects co-financed by EU Structural and Cohesion Funds** - achieved by the dissemination of information on dedicated webpages, publishing monitoring reports, dissemination of findings to the media and online, disseminating IP best practice, organising events regionally (4 European events and 1 final online event), participating in major events to communicate about IPs, and 10 national closing events, as well as national, regional and local advocacy.

**Specific Objective 3: Draw lessons from the pilot for future replication and mainstreaming of Integrity Pacts** - achieved by the use of the project MEL system, a mid-term learning review, final lessons learnt report

\(^{58}\) These documents were expected to each be over 50 pages in length and therefore analysis of them in the timeline for the evaluation was not possible.
(looking at both social accountability and the economic benefits (cost-savings), the establishment of an advisory committee, organising 5 project meetings and producing 8 knowledge products.

**Results Found**

For **Specific Objective 1**, the evaluation finds the project had mixed success in delivering on these activities. While the 18 projects\(^{59}\) were selected for monitoring, one of the procurement projects stalled on the side of the CA (TI-Romania/IPP E-Catalogue), one was not followed all the way to execution due to cancellation by the MA due to unacceptably high corruption risks (TI-Latvia),\(^{60}\) while there were other delays for specific procurement processes found (such as Amapola Education as one example). There was also mixed engagement of citizens in monitoring activities which was planned as a key aspect of this area of work and limited engagement with bidders. The learnings from this citizen engagement aspect have been internalised well within the team, with deep reflection on the challenges and practical limitations of this within IPs.

The section below on short term outcomes provides further details and examples of IP project results at improving integrity, but overall, the findings from the implementing partners reflections on the main changes achieved show varied levels of achievement. 8 partners felt they had contributed in a significant way to the strengthening of the integrity capacity of targeted contracting authorities and successful bidders and 10 felt they had contributed to strengthen the prevention, detection, and resolution of irregularities in targeted public procurement processes. In terms of the project KPI monitoring data, only 4 IPs met their planned target that 75% of their reported irregularities would be adequately resolved (8 IPs had this target, showing that on this indicator only 50% were effective at reaching this level).

The learnings from the project highlight the inadequacy of this specific objective considering the project's goals (in particular the intention to learn from a range of different contexts about where IPs may or may not be appropriate). The evaluators note that this objective has an overly high level of ambition of the project ensuring integrity and transparency across all 18 IPs. Given the other purpose of the project was to learn and pilot the IP including in less ideal contexts, it would have been more appropriate that the specific objectives recognise ‘unsuccessful’ IPs (according to these metrics) as still worthwhile and valid for providing lessons learned. The goals of ensuring that the projects which are co-financed should have integrity/accountability ensured, are also overly ambitious given the monitors were only following certain procurement processes and were not necessarily monitoring the entire project. Objectives set at the level of ‘procurement procedures’ would therefore have been more appropriate (of which 46 were monitored according to project data). The requirement to follow the procurements across all stages was not possible for monitors but those that were involved early and particularly in pre-tendering and tendering phases found the benefits of monitoring to be high. Better planning during the initial phase of the project to ensure alignment between the project’s

\(^{59}\) We note some discrepancy in the definition of a project, and the project monitoring airtable identifies some of these projects as involving sub-components so in fact the total may be higher depending on the definition used. We report here the figure as used in the donor Progress Reports.

objectives, strategy and approach in the DOA would have helped manage expectations about what could be delivered by the IP projects.

For **Specific Objective 2**, the evaluation found that the project did deliver largely on many of the planned activities for this area of work, with the only significant gap found in lower levels of published monitoring reports by some monitoring partners (see Case Study in Annex 4 for more details) and lower levels of expected wins in the areas of regional advocacy, which leads the evaluators to conclude that this objective was not fully achieved.

Key areas of achievement at the activity/output level include the dedicated project website\(^{61}\) which hosts both information about all the IP projects overall, but also commentary pieces in the form of blogs and news features on IPs. While the project was hampered by staff shortages - particularly communication functions at the Secretariat in the first half of the project - these staffing gaps were addressed by the end of the project. The Communications Team at TI-S adapted their communication strategies based on ongoing learnings to disseminate messages to targeted audiences who had greater interest in procurement (given the technical nature of IPs) and in particular in response to COVID-19. The quality of the communications was noted to be of very high visual quality and to be engaging despite the challenges of communicating on such a technical topic. As reported in the section 'Impact' some partners had notable success in engaging with the media, particularly since the COVID pandemic brought heightened interest in procurement. Others did report that the technical nature of IPs, as well as media preference for reporting stories of corruption, rather than preventative measures, made it challenging to get media buy-in for reporting on the project. 10 National closing events have been held so far and the overall closing event was held in February 2022 online due to the COVID pandemic. Interviewees from 3 different stakeholder groups, expressed dissatisfaction with the planning of the closing event (such as insufficient time allowed for planning, timeliness and inclusiveness of agenda creation and the fact that it was online rather than in-person) as well as technical difficulties with the online platform. Holding the event online rather than in person was noted by some internal stakeholders as necessary due to COVID-19 and avoiding risk of transmission which is understandable. Clearer specifications on roles and responsibilities of the different parties would have helped ensure expectations were aligned.

Regional, national and local advocacy were also intended to contribute to this objective. In the absence of clear targets for this area of work, the evaluation concludes from the data available that at national and local level, there was evidence of ample advocacy and several policy wins were recorded which may be attributable in part to the work of the partners (see Impact for examples). At the regional level, there were some promising initiatives including a coordinated effort to advocate around the EU recovery funds. However, overall, considering the scale of the project, the regional advocacy elements were underwhelming due in part to the small role attributed to the TI-EU office in the project. The evaluators find that better specification of indicators and targets for this objective in the DOA would have been helpful as this area of the project involves a wide range of activities, undertaken by multiple

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partners, across all levels of the project. Clear measurable indicators and targets would have helped manage expectations about what change(s) the project hoped to contribute to under this area of work.

For **Specific Objective 3**, the project was found to have delivered on a number of these planned activities, including the development and implementation of the MEL system and the mid-term evaluation. The lessons generated from the pilots have informed several knowledge products, such as:

1. Integrity pacts in the EU: Suitability, set up and implementation (February 2022)
2. Safeguarding EU-funded investments with Integrity Pacts: A decision-maker’s guide to collaborative public contracting monitoring (March 2021)
3. 10 Impact Case Studies from the IP EU Project (various dates, 2021)
4. Citizen engagement in public contracting- Lessons learned from the Integrity Pacts Project
5. IP game Tender defender (August 2021)
6. Several blogposts including ‘Investigations and unsigned contracts: How Integrity Pacts enhance transparency and accountability’ (Various Dates)
7. Advocacy kit
8. The Red Flags Detection Tool
9. Integrity Pact Strategic Brief
10. Monitoring public contracting: Experience from 18 integrity pacts in the EU (April 2022)

TI-S provided a big push on this aspect of the project in the final year, and team members reported notable strides made to ensure the evidence presented was rigorous and robust. Opportunities for adaptive learning were hampered by the fact that the learning products almost all came at the very end of the project. The engagement with the Basel Institute on the B20 Collective Action Database also supported the sharing of knowledge on IPs with a wider audience. Typical users of the database include the private sector and academics, and it has reportedly been downloaded over 1000 times. As noted previously, the advisory committee was not active during the project which was the only significant gap found against planned activities. In lieu of an indicator attached to this specific objective detailing how ‘drawing lessons’ can be measured, the evaluators conclude that the activity and output level this area of work was largely achieved, and interviews and an assessment of the documents find that internally the lessons from the pilot do seem to have been mostly drawn at least internally. As a number of these learning products came at the very end of the project, evidence of their external impact, take-up and use is limited to a few examples. The evaluators conclude this area of work was largely but not fully achieved. A specification of indicators and targets for this specific objective in the DOA, detailing how this body of knowledge would contribute to a specific change would have been beneficial.

**Short-term Outcomes**

The MEL system (as reflected in the ToC for IPs) defines 6 short-term outcomes. These outcomes were intended as **potential** outcomes and not all were planned to be achieved by each partner. Outcome

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62 https://baselgovernance.org/b20-collective-action-hub/integrity-pacts
variables are not defined for the work of the TI-EU Office nor for TI-S but were developed to reflect the achievements of the partners when undertaking IPs.

Figure 8 shows the number of partners who reported having contributed significantly to changes on each outcome area, reflecting both intended and unintended changes and the level of expected changes that were not ultimately realised. It is based on the end of project aggregation of partners’ most-significant change mapping, which is the project management team’s method of summarising and comparing results across partners. It is considered an important data source on final project results as per the MEL plan, along with other final products. While it might not reflect all changes which the partners contributed to, it reflects the most significant examples as self-reflected by the partners themselves. On average, monitors intended to contribute to 2.6 areas, 3 monitors showed high ambition by planning to contribute to 4 areas, while 3 monitors focussed only on 1 area, to which they planned to contribute.

**Figure 8: Partners’ Contributions to change (successful - intended & unintended - and unsuccessful) on Short-term Outcomes**

<table>
<thead>
<tr>
<th>Short-term Outcomes: Successful (Intended, unintended) and unsuccessful contributions to change</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>STRENGTHEN THE INTEGRITY CAPACITY OF CA AND/OR BIDDERS (S1)</strong></td>
</tr>
<tr>
<td><strong>STRENGTHEN PREVENTION, DETECTION, AND/OR RESOLUTION OF IRREGULARITIES IN TARGETED PP PROCESSES (S2)</strong></td>
</tr>
<tr>
<td><strong>INCREASE TRUST AMONG TARGETED CA, BIDDERS AND THE PUBLIC (S3)</strong></td>
</tr>
<tr>
<td><strong>INCREASE GOOD-WILL OF TARGETED GOVERNMENT AUTHORITIES AND SUCCESSFUL BIDDERS FOR IMPLEMENTING (SYSTEMIC) REFORMS (S4)</strong></td>
</tr>
<tr>
<td><strong>INCREASE CAPACITY AND/OR WILL OF INTENDED BENEFICIARIES/TARGETED PUBLIC TO ENGAGE IN MONITORING PUBLIC PROCUREMENT PROCESSES AND REPORT PERCEIVED RISKS (S5)</strong></td>
</tr>
<tr>
<td><strong>INCREASE CAPACITY AND/OR WILLINGNESS OF THE TARGETED MEDIA TO OVERSEE PUBLIC PROCUREMENT PROCESSES (S6)</strong></td>
</tr>
</tbody>
</table>

- Denotes monitor who intended to and reported contributing to significant changes on this outcome
- Denotes monitor who did not intend to contribute to change on this outcome but did report significant contribution to changes
- Denotes monitor who intended to contribute on this outcome but did not report significant contribution to changes

*Source: Internal Monitoring Data: Consolidated Change Maps and Envisaged versus Achieved Changes*

While partners also undertook their own additional context specific data collection to report on their progress on these outcomes, this data was not available to the evaluators at the time of writing this report. This is a limitation when assessing effectiveness here, as the project’s aggregation of the

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63 Figure 8 should not be interpreted as representing the totality of results to which the project partners reported contributing. The change-mapping exercise allowed partners to prioritise 5 key changes, thus summarising the most significant changes to which they reported contributing, and these most significant changes are the ones reflected here.
results from the change maps did not define baseline or targets for 5 out of 6 of the short-term outcomes.

**Outcome areas demonstrating project’s effectiveness**

Taking into account intended and unintended contributions to change, on short-term outcomes 1, 2 and 4, a comparatively high number of partners reported contributions to changes. Outcome 2 saw the highest number of partners reporting changes (9). Interestingly only 1 partner (SBF, Poland) prioritised Outcome 2 as one to which they expected to contribute to significant change, but ultimately 10 of the 14 monitors reported contributing to change here. The target of 75% resolution of irregularities was not met - just as at the mid-project point, the figure of satisfactory resolutions remains at 50% at the end of the project. Examples of changes contributed to here included the detection of irregularities in the evaluation phase leading to exclusion of the provisional awardee (Amapola, Italy), the detection of the use of unfairly restrictive criteria in tendering documents leading to the exclusion of potential bidders (TI-Greece, IPP and TI Romania), the detection of irregularities in tender documentation in contravention of national law (TI Slovenia). One of the most compelling examples comes from a procurement which was ultimately cancelled due to the irregularities found by the monitor, TI Latvia. In this case, in assessing the tender documents (under the IP related to the Tramline in Riga), TI Latvia’s monitoring team identified several restrictive requirements that were deemed to favour one specific bidder. The monitor filed a complaint identifying 17 irregularities in the documents and requested the cancellation of the procurement. Following the episode, TI Latvia’s monitoring team was fully involved in the re-drafting of the procurement documents. The tender was relaunched in July 2017 and included all the recommendations provided by TI Latvia. In the relaunched tender, TI Latvia identified another irregularity pertaining to a potential suspicion of document forgery. Following inaction by the CA, TI Latvia engaged the State Police to encourage them to carry out a formal investigation in the case.

The detection of these irregularities mostly occurred in the pre-tendering or tendering phases and demonstrates the preventive power of the IP. The idea that an IP would detect ‘corruption’ was considered by most partners to be unrealistic and, in line with their experience, they expected that irregularities found during an IP would point to potential corruption risks, rather than actual incidences of wrongdoing. This highlights the IP’s niche potential as an anti-corruption tool, using a broad understanding of anti-corruption (to not only focus on detection but also on prevention and education) which is central to the concept of the IP.

Regarding strengthening the integrity capacity of CAs and/or bidders (Short-term Outcome 1), 8 partners reported contributing to changes in this outcome area. Examples of changes noted under this outcome included improvements in tender documents and public procurement procedures in line with EU best practice (TI-Portugal), anti-corruption training becoming part of the CA’s official training curriculum (TI Hungary), a whistleblowing policy adopted by a bidder/contractor in line with

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64 Internal Monitoring Data March 2022: ‘Envisaged versus Achieved Changes’
65 Internal Monitoring Data March 2022: ‘MEL End-term results SHORT’
66 Examples from Internal Monitoring Data: Partners’ Annual Change maps.
the monitor’s advice and further ethical consultation requested by the contractor and provided by the
monitor (SBF, Poland - see Case Study in Annex 4 for further details). The results in this area related
mostly to the strengthening of integrity capacity of CAs and there were much fewer examples related
to bidders. Only 4 partners made any recommendations regarding improvements to integrity capacity
of bidders over the course of the project and interviewees noted that they faced challenges in
engaging with the bidders outside of the formalities of the IP. Increasing the integrity capacity of
bidders was therefore an area of particular weakness in the project’s results (which was corroborated
additionally via interviews with monitors), although this does not stand out clearly in the monitoring
results because of the grouping together of CAs and bidders under Outcomes 1, 3 and 4. Given the
CA and bidders are two quite different target audiences it would be more useful to have separate
indicators for these two groups rather than merging together.

Regarding increasing the goodwill of public authorities and successful bidders to implement systemic
reforms (Short-term outcome 4), the results were more or less in line with expectations (7 partners
reported changes). 4 out of 5 partners who expected to achieve change on this outcome did so.
Additionally, 3 partners who did not expect to contribute to change in this area ultimately did
contribute to some changes here. As one CA representative noted in the survey “In general I have
experienced fair cooperation with Transparency International, the mutual sharing of information of each
other during the cooperation greatly increased the trust between the two parties. By the end of the
cooperation, I think we have worked together respecting each other’s work in order to show the public that
even in the case of a large project, it is easy to carry out a corruption-free public procurement procedure
and implement it.”. Again, almost all examples cited in the change maps related to public authorities
rather than bidders. Examples include the inclusion of civil society monitoring mechanisms of public
procurements in the National Anticorruption Strategy (Romania) and the inclusion, in the national
Open Government Partnership (OGP) Action Plan of a commitment envisaging the piloting of the IPs
in 5 municipalities where EU-funded projects are being implemented (Latvia).

The evaluation finds high levels of similarity between these examples and intermediate outcome examples of change reflecting a lack of clarity among partners in how to distinguish between the outcomes, which is problematic and suggests the need for more centralised quality control and greater dialogue with
(and between) partners on what types of changes should count as short-term or intermediate.
Additionally, some partners noted challenges in defining and measuring the concept of ‘good-will’.

Outcome areas showing lower levels of contribution to change

Outcome areas where lower self-reported contribution to change was found were Outcomes 3
(increasing trust among CA, bidders and the public), 5 (citizen-engagement) and 6 (increasing the
capacity and/or willingness of the targeted media to oversee PP). The evaluation team considers
Outcome 3 to be more appropriate as an intermediate outcome rather than a short-term outcome,

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67 Internal MEL documentation: Partners’ recommendation logs
68 Internal Monitoring Data March 2022: ‘Envisaged versus Achieved Changes’
69 Examples from Internal Monitoring Data: Partners’ Annual Change maps.
70 Internal Monitoring Data: Consolidated Change Maps and Envisaged versus Achieved Changes
considering trust-building is usually a lengthy and non-linear process, especially considering the ambition to increase the public’s trust under this outcome. The examples of trust-building mentioned by partners and documented in the change maps tended to be isolated to the project being monitored and several monitors mentioned they were unsure that they would be replicated outside of the IP ‘bubble’. As mentioned by one interview: “increasing trust of citizens in the public contracting authority...Do you know how much it takes to increase trust? [Can] the IP really increase trust? Can we achieve that with the IP?” This finding should be considered when updating the ToC for IPs.

Under Outcome 5, partners were aiming to increase the capacity and/or willingness of the public to engage in monitoring of procurement processes and reporting of perceived risks. This was a new area of work for many of the partners and was one of the most challenging aspects of the project for many of them. The results are not as compelling as TI would have hoped at the outset of the project, when a huge emphasis was placed on the social accountability dimension and the participatory monitoring by affected communities. Ultimately out of 11 monitors who had prioritised this outcome area in their programme of work, only 5 succeeded in contributing to any changes (with one additional partner unexpectedly achieving change here). ActionAid mapped and targeted key local interest groups for the monitoring of an Archaeological site. Amapola Italy educated students on corruption risks in public procurement so they might have the skills to monitor in future. A public reporting platform was created by TI Bulgaria but their ultimate intention to engage affected communities was thwarted by the pandemic. The learning opportunities presented by the challenges faced in this area of work were grasped by TI-S and a detailed lessons learned report was produced under the project, which will be most useful for future IP projects. The report outlines 15 challenges or obstacles that the IP project partners faced, to varying degrees, in engaging citizens through the IP project. This evaluation confirms these challenges which were discussed during interviews with partners and also confirms the finding in that report that despite IP partners undertaking an array of activities to promote citizen engagement through the project, ultimately there were few successes in this regard. Of 21 citizen engagement initiatives identified across all partners, 8 were considered ‘positive’ or successful in the above-mentioned report. It is important to note that in the second half of the project, with the monitored projects entering their implementation phase, many partners were planning on strengthening their citizens’ engagement activities. With the outbreak of the pandemic, these activities were cancelled with only a few exceptions.

Outcome 6 was the one area where no progress at all was documented via the change mapping monitoring data, which was further supported via interviews. The failure to engage the media systematically and to increase their capacities to report on the IPs and PP more generally was widely acknowledged by project partners and TI-S. Partners found it very difficult to motivate media to report on the IPs, particularly on neutral or positive stories. An interesting example of engagement with the media comes from TI-Romania and IPP’s use of an investigative journalist to undertake background

71 TI, 2021 ‘Citizen engagement in public contracting: Lessons learned from the Integrity Pacts Project’.
72 Internal Monitoring Data March 2022: ‘Envisaged versus Achieved Changes’ and Consolidated Change Maps. According to the project team, the final narrative reports from the partners reflect some examples, however at the time of the fieldwork for the evaluation, these were not available to the evaluators.
checks on companies. There were also good examples of use of media by SBF in Poland (including the development of a podcast). The pandemic presented opportunities in the form of increased media interest in procurement of medical supplies and vaccines. This opportunity was seized upon by many partners and examples of successful media traction included the attention given to TI Hungary's freedom of information cases related to COVID-19 vaccines, including a mention in a New York Times' article on the Hungarian government purchase of Chinese vaccines. While some partners were more successful in garnering media attention during their IPs, most reflected that increasing the capacities of media via this project was not a particularly successful aspect. Unlike the citizen engagement component, no systematic learning exercise has been carried out to unpack this area of lower effectiveness and this is certainly an area for further reflection for the Communications team at TI-S, and the project partners more widely.

**Facilitating and Hindering Factors for Effectiveness**

The evaluation has identified, via interviews with all stakeholder groups as well as documentary analysis and secondary analysis of monitoring data, several factors across all levels of the project which impacted on the effectiveness of the project overall - from initial design of the project and its set up, to project management, role of the monitors, and national/contracting authority related factors (summarised in Figure 9 below).

**Figure 9. Table showing aggregated factors which helped or hindered effectiveness**

<table>
<thead>
<tr>
<th>Overall Project Design &amp; Set-up</th>
<th>Helping</th>
<th>Hindering</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Ambition and commitment for learning and knowledge generation</td>
<td>• Lack of alignment between the projects objectives and design/strategic approach</td>
<td></td>
</tr>
<tr>
<td>• Applying adaptive management principles to allow context specific adaptations</td>
<td>• Lack of measurable indicators and targets for specific objectives specifying the changes that some activities would be contributing to</td>
<td></td>
</tr>
<tr>
<td>• A MTLR conducted to allow for course corrections</td>
<td>• Lack of deep context analysis for EU procurement issues</td>
<td></td>
</tr>
<tr>
<td>• A MEL system to collect data on IPs which responded to the complexity of the project’s design</td>
<td>• Issues with case selection (not ideal cases for IP projects)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Timelines for procurements not fitting donor-funded project timelines</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Challenges synchronising timelines for multiple IPs</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Limited role envisioned for TI-EU office for advocacy</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• High levels of adaptation allowed, with no minimum standards set</td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Role of DG Regio to follow up on complaints was not envisaged</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Project Management</th>
<th>Helping</th>
<th>Hindering</th>
</tr>
</thead>
<tbody>
<tr>
<td>• An engaged donor who wanted to play an active role during implementation</td>
<td>• Lack of regional/global advocacy strategy</td>
<td></td>
</tr>
<tr>
<td>• A committed Project Management team</td>
<td>• Lack of senior regional/global advocacy staff on the project</td>
<td></td>
</tr>
<tr>
<td>• Online systems for knowledge sharing/communication</td>
<td>• Staff turnover at TI-S resulting in institutional knowledge being lost</td>
<td></td>
</tr>
<tr>
<td>• Exchange visits between partners</td>
<td>• Critical staff functions unfilled</td>
<td></td>
</tr>
<tr>
<td>• Meetings to facilitate knowledge sharing</td>
<td>• Lack of central monitoring data quality control</td>
<td></td>
</tr>
<tr>
<td>Monitor</td>
<td>IP Agreement</td>
<td>National/CA</td>
</tr>
<tr>
<td>---------</td>
<td>--------------</td>
<td>-------------</td>
</tr>
</tbody>
</table>
| - Consistent monitoring staff  
- Ambitious team who wanted to make the most of the project  
- Creative thinking for citizen engagement  
- Regular publishing of monitoring reports  
- Ability to create engaging content (such as online social media or written reports)  
- An identified staff member in charge of MEL data collection and reporting | - Incentives linked to having IP signed - leading to concessions and weaker IP agreements  
- Weak transparency provisions limited documentation available to monitor  
- Lack of real-time/quick access to documentations  
- Coming too late in the procurement process once bidders have already been selected | - Good initial CA Buy-in  
- Engaged CA, responsive and willing to take on board recommendations  
- Project which has national/local interest  
- Timely delivery of information to monitor |

| - Limited day allocation for MEL expert/lack of internal MEL function in IP team  
- Knowledge/ evidence products produced late  
- Biannual meetings did not allow for enough knowledge sharing  
- Roles and responsibilities of DG Regio in the project were unclear, leading to mixed expectations | - Staff turnover at monitor  
- Low levels of ambition among some monitors on what the IP could achieve which sometimes felt at odds with the budget involved  
- Incentives of monitors impacted by receiving funding for continued monitoring  
- Lack of clarity when a monitor can walk away/terminate an IP  
- Lack of capacities in MEL for some monitors | - Staff turn-over at CA  
- CA who had the project imposed upon them  
- Lack of political will from MA  
- Lack of willingness on part of CA to take on board monitor’s suggestions  
- Delays to the signing of IPs  
- Project delays with the procurement  
- Political changes/upheaval  
- Long distances between monitors and CAs  
- Restrictions imposed on monitors on publishing information  
- CAs who already have very good robust systems in place, therefore gave limited opportunities for improvement |

*Source: interviews with all stakeholder groups and documentary analysis*

Additionally, the evaluation sought to engage the implementing partners using a participatory approach during interviews to identify what factors they felt may have helped or hindered the
achievement of the IPs in their context. The following emerged as seemingly most influential, however, given the lack of a common objectively measurable dependent variable (a uniform definition of success/effectiveness) and some missing data, the results should be treated as indicative rather than definitive:

- **Level of political will from the CA** (CAs who felt the IP was imposed upon them by their MA tended to be less receptive to the work of the monitors)
- **Quality of working relationship with CA** - including speed of sharing information (Monitors who felt the CA was very receptive to their recommendations and shared information readily felt the IPs were more successful)
- **Starting Point of the Monitoring** (generally monitors found being engaged in discussion about the project at a very early stage to be the most beneficial)
- **IP’s legal status/being mandatory for all bidders supports effectiveness** (only in Italy was there a legal framework to allow for this, so this does not seem a requirement but was supportive)
- **Consistent staffing within monitor and CA** (partners who had consistent staffing felt this supported the effectiveness of their IPs)
- **Procedures for publishing monitoring reports** (partners who had restrictions on publishing the monitoring reports found this undermined their ability to monitor effectively).

The type of project which was being monitored was also reflected frequently by monitors as a factor for lower success (size, sector, local interest), but there was recognition that a hard and fast rule would be challenging given some small projects such as the TI-Portugal Monastery project were found to be quite effective.

In the specific area of citizen engagement, the factors hindering effectiveness were many and have as mentioned earlier been extracted in a learning report commissioned by TI-S which should be of use for future implementation of IPs. Among the main factors which hindered citizen engagement included: lack of monitors skills in citizen engagement, the types of projects which were being monitored being less interesting for citizens or lacking a clear target audience of impacted citizen groups, long travel distances to project site, citizen opposition to the project and the COVID-19 pandemic. Factors which helped citizen engagement aspects included: previous experience of the monitors with citizen engagement, clear target groups of affected communities, willingness of monitors to ‘think outside of the box’ and experiment with different conceptions of how to engage citizens.

**Cost-savings**

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73 This resulted in a list of 23 factors (including factors related to legal context, political will, relationships between stakeholders, key characteristics of the IP setup, features of the project being monitored, timing of engagement as monitor, the partners’ capacities and prior experience etc). A review of monitoring data and clarification emails sent to 14 partners resulted in additional variables being included in the analysis and allowed the evaluators to code the factors per IP. Qualitative comparative case study analysis was then used to explore patterns between groups of partners.

One aspect of the overall goal of the project was to demonstrate whether IPs contribute to clean public procurement processes that deliver cost-savings. Challenges to the conceptual validity of calculating the cost-savings brought by IPs were noted during interviews, where the emphasis on cost-savings as seen as not always appropriate, given monitoring may lead to some increased costs but ensures better quality, or also limitations in fully assessing the implications of recommendations on the actual cost of the project. Additionally, given the project has a strong ‘preventative’ ambition, it is hard - if not impossible - to estimate costs if the monitoring hadn’t taken place.

This challenge to assessing cost-savings was reflected in the MEL guidelines, with instead the focus being on cost-effectiveness. The project monitoring system attempted to collect data from across all partners to show what potential contribution IPs could make to getting value for money from procurement projects (while noting that it may be impossible to calculate this accurately), by assessing whether recommendations may have had a positive or negative cost effectiveness impact. Two KPIs were developed with data collected from all monitoring partners (see table summary below).

**Figure 11. Number of provided recommendations which have been adequately taken on board and have positive and/or negative cost-effectiveness implications - by partner**

<table>
<thead>
<tr>
<th>Partner</th>
<th>Number of Positive cost-effectiveness implications</th>
<th>Number of Negative cost-effectiveness implications</th>
</tr>
</thead>
<tbody>
<tr>
<td>ActionAid</td>
<td>8</td>
<td>1</td>
</tr>
<tr>
<td>Amapola</td>
<td>1</td>
<td>3</td>
</tr>
<tr>
<td>RAS</td>
<td>17</td>
<td>5</td>
</tr>
<tr>
<td>SBF</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>Ti-CZ</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Ti-GR</td>
<td>5</td>
<td>0</td>
</tr>
<tr>
<td>Ti-HU</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Ti-GR</td>
<td>15</td>
<td>7</td>
</tr>
<tr>
<td>Ti-IT</td>
<td>6</td>
<td>2</td>
</tr>
<tr>
<td>Ti-LT</td>
<td>5</td>
<td>3</td>
</tr>
<tr>
<td>Ti-LV</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>Ti-PT</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td>Ti-RO &amp; IPP</td>
<td>6</td>
<td>2</td>
</tr>
<tr>
<td><strong>Grand Total</strong></td>
<td><strong>77</strong></td>
<td><strong>27</strong></td>
</tr>
</tbody>
</table>

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Types of positive cost-effectiveness noted by partners via the project KPI data collection system include: making recommendations which will support fair or open competition (ActionAid, TI-CZ, TI-LV TI-LT) or reduce collusion (TI-RO & IPP); clarifications to reduce the risk of future legal challenges, disputes between the selected bidder and CA or avoid the tender needing to be relaunched (ActionAid, TI-PT, TI-LV); to improve the quality of the final delivery (ActionAid, TI-PT, TI IT); amendments to selection criteria so that quality of provisions was also a criterion (SBF); assessments of anti-corruption policies such as whistle-blower protection of the selected bidder meaning irregularities will be more easily revealed (SBF, TI IT); to ensure the financial basis of associations are assessed (TI-GR); or would leave to future energy savings (TI-SI).

A number of these recommendations related to identifying issues ahead of time which may prevent further delays and legal disputes. As noted by one member of a CA during a recorded interview for TI IT (published online in Jan 2022) “The Integrity Pact with the presence of Transparency International Italia to oversee and check the correctness of the initiatives allowed us to have authority and respect from the competitors in the initial stages of the project (pre-tender and tender activities), everything went smoothly and there have been no appeals or disputes which usually waste a lot of time.” As delays during procurement projects can be very costly, by identifying issues ahead of time, IPs can help with cost-effectiveness.

Some recommendations from monitors reportedly led to cost savings such as RAS who recommended the cancellation of some aspects of a project which were deemed no longer necessary and TI Hungary giving recommendations to reduce the price estimate based on market value saving 200 million HUF (approximately 542 200 EUR). TI Bulgaria made a recommendation which was not followed by the CA, which later caused major issues with the project, and now is being corrected at great cost. This is an example of a potential cost-saving of IPs but that their effectiveness in ensuring IPs can give value for money for procurements is outside the control of the monitors.

Types of negative cost-effectiveness recommendations given by implementing partners and recorded in their KPI records include: requests made for further information from a bidder with abnormally low bid (Amapola); additional translation costs (RAS, TI-LV); additional technical support (SBF) or external verification (TI-IT); requiring higher standards on engaged experts who might then have higher fees (RAS); higher standards for reporting which require more staff time (TI-IT); higher quality requirements when assessing bids (TI-RO & IPP); for costs to follow inflation rates (RAS); increasing the price estimations based on market rates (TI-RO & IPP); recommendations which may lead to slower but more accurate work (TI-IT); setting up a whistle-blower system requiring time and resources (TI-IT); time and costs for publishing information in the online tendering system (TI-LV); and recommendations to bring the procurement documents in line with legal requirements (TI-SI).

The evaluation finds some examples given by monitors as quite indirect and unspecific, and do not allow for a true estimation of the cost implication. Some recommendations given by partners as

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having ‘negative’ cost-effectiveness implications in reality may have had positive implications on cost in the long-run (such as the example from Amapola). Additionally, when reviewing the list of recommendations, a number did not seem to fit the criteria for cost effectiveness, suggesting a need for greater quality control and understanding between partners about what should be included.

One monitor reflected that IPs would be able to deliver greater cost-savings had they had an opportunity to be involved from the very start in the design phase of the project, but this was rarely the case in this project. Once the project is already designed monitors have limited opportunities to make significant impacts on the cost. Two interviewees (internal stakeholders) also flagged that they would need to engage external expertise for a market analysis or market study to really assess value for money, which was not necessarily the case during this project given many of the IPs started once these decisions had already been made.

Risk mapping

The risk mapping approach was found to be useful for implementing partners and it allowed them to identify potential risks and plan appropriate strategies for overcoming them. Partners with extensive experience in implementing large projects noted that it reflected similarly to the existing systems they use. Future applications of the system for similar projects should emphasise updating and maintaining the list of risks in real time to ensure the Project Manager stays responsive to changes in the local context, as well as developing an overall risk management system managed by the TI-S Project Manager which incorporates risks to the project overall.

6. Outcomes and Impact

- To what extent has the project contributed to any medium- or long-term impacts (both intended or unintended), such as social, economic, political, and behavioural changes?
- What internal and external factors contributed to the impacts seen (both positive and negative)

The evaluation assessed the extent to which the project achieved the 8 ‘intermediate outcomes’ - which represent expected medium- to long-term results of the IP project, exploring three examples in-depth via case study analysis (found in Annex 4).

While no time frame was specified for the achievement of progress on these outcomes, one would expect some signs of achievement after 6 years with an investment of this scale. As with the short-term outcomes, monitors could select which of these medium to longer-term changes they would be intending to contribute to. The intention was to allow a flexible and responsive, bottom-up approach, which was context specific. On average, monitors intended to contribute to 3.6 areas. 3 monitors had the highest level of ambition by planning to contribute to 5 areas. 1 monitor stated that they only planned to achieve results in 2 areas. Figure 12 shows the number of partners who report having contributed significantly to changes on the outcomes - both intended and unintended and the level of expected changes that were not ultimately realised. It is based on the project team's aggregation of the final change maps from the partners. The monitoring data, corroborated by the interviews for this evaluation indicate, to the extent that it is possible to measure it, that the reported level of contribution of the project in these intended outcome areas was modest by the time of this evaluation.
The project achieved modest self-reported contribution across 3 of the 8 outcomes areas with very little change reported by implementing partners in 4 areas and no change reported in one area.\textsuperscript{77}

Both internal and external interviewees reflected a level of scepticism about the extent to which such national or high-level change could be expected from the monitoring of a single IP project. The evaluators found similar changes being reported on for the intermediate outcomes as for the short-term outcomes, suggesting a lack of common understanding on what successes should count. Centralised quality control and dialogue between partners about what should count, and where, may have avoided duplicate entries. Outcome 8 and 10 also appear to be very similar and partners reported difficulties differentiating them. At the aggregate overall project monitoring level, several outcomes did not have specific targets attached or baseline measures.

\textbf{Figure 12: Partners’ Contributions to change (successful - intended & unintended - and unsuccessful) on Intermediate Outcomes}\textsuperscript{78}

\begin{figure}[h]
\centering
\includegraphics[width=\textwidth]{figure12.png}
\caption{Intermediate Outcomes: Successful (Intended, unintended) and unsuccessful contributions to change}
\end{figure}

\textit{Source: Internal Monitoring Data: Consolidated Change Maps and Envisaged versus Achieved Changes}

Differential results were found across the beneficiaries. Outcome 11 (more transparency, participation and accountability in public procurement processes) had the highest numbers of

\textsuperscript{77} Across the partners’ final narrative reports, which were produced after the end of fieldwork and were therefore not available to the evaluation team at the time of writing, one example of impact in this area was noted from TI Bulgaria.

\textsuperscript{78} Figure 12 should not be interpreted as representing the totality of impacts contributed to by the project partners. The change-mapping exercise allowed partners to prioritise 5 key impacts, thus summarising the most significant changes to which they reported contributing, and these most significant changes are the ones reflected here.
monitors reporting significant changes (8). At the level of legislative/policy changes and the enforcement of policy and standards by governments (Outcome 9 and Outcome 7), some impact was recorded by implementing partners via the qualitative change maps and many of these examples were mentioned in interviews with implementing partners. For example, in Romania, partners reported that the National Agency for Public Procurement published information about Integrity Pacts, presenting the IP tool as a good practice for all CAs in the country attributed to a sustained and coordinated advocacy campaign on the part of the Romanian partners (see Case Study in Annex 4). In Poland, the Ministry of Development Funds and Regional Policy (MA) announced a plan to introduce IPs as a standard tool in public procurements, accessible for use by beneficiaries of Operational Programme ‘Infrastructure and Environment’ in the next budgeting period for 2021-2027. While not mandatory for procurements, the partner saw this as a positive change in discourse indicating acceptance of the IP as an important tool. Other partners noted an ongoing dialogue around strengthening integrity in public procurement (such as in Portugal) and some promising avenues for cooperation, such as in Italy, the co-production of guidelines on the implementation of an IP in the Italian legislative framework together with governmental key-actors such as National Anti-Corruption Authority and the Public Administration Ministry. National level engagement in the topic was noted by several monitors to be dependent on political will and the wider political environment. In the case of one monitor, the election of a new government which was less welcoming of civil society stalled progress at this level.

The outcomes related to bidders’ integrity standards and practices (Outcome 8 and 10) showed relatively little impact, which was reflected also in interviews whereby relationships with bidders were found to be difficult to forge through the project. One example of impact in this area stands out - in Poland, the lead contractor introduced WB policy for the first time, which was seen as an improvement in bidders’ ethical infrastructure (see Case Study in Annex 4). However, aside from this example, few partners reported having any significant impact on the policies, standards, and corporate governance practices of bidders through the project. The project identified two KPIs as being relevant to monitor this area of work - adoption and application of improved (corporate governance) standards in public procurement. End of project data found one target indicator based on KPI data for this outcome was reached and one target based on KPI data was only partially achieved.

As with the short-term outcomes, very limited impact was also reported in terms of citizen engagement in monitoring (Outcome 13), with just one monitor (ActionAid) reporting via the Change Maps that citizen groups showed continued engagement in monitoring efforts. Interviewees noted, as before, that it remains difficult to communicate publicly on such a technical topic, with one recommending: “So for the future, I would perhaps say that it’s important to understand how to stay relevant to different groups and how to simplify the messages and to simplify the language. And that includes us as well. I mean, in general, when we speak about an IP, it’s been a very technical project and we need to understand how to make it simple and meaningful for different target audiences.” These communication challenges were also at the root of the low level of impact in the area of increasing the level and quality of media oversight of public procurement. See previous section on ‘Effectiveness’ for other factors.
Unintended Outcomes

Outside of the stated intermediate outcomes, the project partners highlighted several other impacts which are of significant value. The project created a network of experts on clean contracting and public procurement across the 11 countries in Europe. Several of the partners reported in interviews that they have gone on to undertake more IPs and their organisations are now seen as public procurement experts in the relevant countries. In addition, there has been extensive capacity-building of implementing partner organisations, helped by the trainings, materials, meetings and briefings organised by TI-S, as well as having the opportunity via this project to follow in-depth procurement projects. This was especially the case for partners who had not engaged in IPs or civic monitoring before this project. They reported that being ‘inside the PP process’ gave them insights that they never would have gained as externals. The project also improved networking between CSO monitors and government authorities, allowing for potential collective action and more involvement in wider-policy issues.

Helping and Hindering Factors

In addition to the factors mentioned in the section on ‘Effectiveness’, which also apply to the intermediate outcomes, intermediate impacts were also likely hampered by delays to several procurement processes, which meant that some did not reach implementation yet, making ambitions for intermediate impact premature. One partner also reflected that while during the course of the monitoring, there was good political buy-in for anti-corruption/integrity work at the national level, however recent political changes have rolled-back progress in this area.

7. Sustainability

- To what extent are the benefits of the project likely to continue once donor funding has ceased?
- To what extent was the project designed and implemented in a way which would enhance the sustainability of the project?

The evaluation found evidence of sustainability of some of the outcomes of the Project overall as well as in terms of the results from the monitoring. The project design did incorporate several elements to support sustainability, principally via the knowledge and learning products produced and the capacities that have been built. Some impacts may not have sustainability if implementing partners do not continue to stay engaged on the topic. The evaluators found that the project team has engaged with donors to continue the work, which helps sustainability. It is recommended that the knowledge gained from this project directly informs the design of future IP initiatives.

Sustainable Results

In terms of sustainability of short-term and intermediate outcomes, an analysis of the partners’ change maps, which summarise partners’ most significant perceived outcomes and impacts achieved
during the project, showed that the majority of the reported changes are considered by the partners themselves to have a high or medium likelihood of sustainability.\(^{79}\)

**Figure 13: Perceived Sustainability of Short-term Outcomes**

![Sustainability of Short-term Outcomes](image)

Source: Evaluators’ Analysis of Combined Final Change Maps: Sustainability of the change qualitative data.

**Examples of Sustainability**

Many of the concrete outputs from the project show a high potential for sustainability - this is particularly the case for the knowledge and learning products which were produced at the latter end of the project. The knowledge built by the partners and their capacity building of CAs may also be sustainable depending on the absence of staffing changes, as well as the establishment of a network of experts on clean contracting across Europe and the relationship-building between partners and MA/CAs in some countries. For example, ActionAid is organising further Monitoring Schools for the Recovery Funds and is presenting the IP tool and is also part of the national observatory for Recovery and Resilience Facility together with TI Italy and Amapola.

A good example of sustainability is the reported use of the IP project documentation and knowledge products in a series of new IPs implemented by one partner (TI-CZ). They reported that without the EU IP project, they would not have been in such a position to move forward so smoothly with these 3 new IP projects. The monitor was approached by another CA and asked to implement IPs on other projects at municipal level. This developed into 3 spin-off IPs financed by the CAs. In another case, a monitor was asked by a newly elected government to present information about IPs and several discussions ensued between the monitor and the government about the inclusion of IPs in the upcoming programme for government. At the time of field work, no formal agreements had been reached but the monitor felt there were positive signs.\(^{80}\)

\(^{79}\) This data was self-reported and while a recommendation to provide external verification was included in the change-mapping methodology, this was not always adhered to.

\(^{80}\) Such as future potential for inclusion of IPs in the 2021-2027 Operational Programmes in Romania, Hungary, Bulgaria, and Poland reported at the time of writing.
Among the intermediate outcome areas, policy/legislative changes were reported as the strongest examples of sustainable changes (see examples under Outcome 9 in ‘Impact’). At the level of the IP, some of the recommendations which have a positive cost-effectiveness were reported by partners as having potential to have sustainable impacts such as TI-IT recommendations to Lombardia that potential for collusion should be assessed, which they agreed to do in the future; TI Romania’s recommendation to the CA to develop a corruption risk management framework and TI-Slovenia’s recommendations which will make energy use more efficient in the future. In addition, it is the evaluators’ view that some recommendations which improved the quality, timeliness or reduced the costs of the project, will have sustainable benefits for the local communities who are the ultimate beneficiaries of the procurement projects.

**Figure 14. Engaged Contracting Authority Support for Implementing IPs again in the future**

Source: End of project implementing partner surveys with contracting authorities. Base 14 responses, from 4 implementing partners.

CAs who reported favourably about potential for undertaking IPs again in the future, pointed to the benefits that the engagement brought via good collaborations, expert consultancy support, and bringing greater transparency and oversight to the issue of procurement. They also appreciated the impartial monitoring which can help build citizen trust in procurement. However, one CA who was against further IPs said they didn’t think it helped the running of their operations although didn’t provide any further elaboration.

**Factors Affecting Sustainability**

Several partners expressed doubt regarding the sustainability of the integrity gains within the public authorities. While there was evidence that integrity capacity was built in many cases, some partners expressed a perception that this was unlikely to sustain outside of the particular project being monitored: ‘In a year or two, I think they’ll have forgotten about us. People have a great capacity to adapt to different situations. The projects we were monitoring were being carried out differently from other..."
projects, for sure. An external expert told us the situation at our monitoring meetings was exceptional and seemed to him like a ‘show’...we did strengthen the integrity capacity of the CA for sure but whether that will sustain, I’m not convinced. The same sentiment was echoed by another partner who stated: “During the pilot, the CA developed their compliance system and in some parts it was due in part to the IP. Also within our IP, they were very careful, transparent, responsive, etc. However, people who have known them for years, contractors, said to us many times that it wasn’t usual behaviour.” Notwithstanding this, the value of the IP as showing the sheer possibility of a clean contracting project was recognised by many partners as something which would sustain in the minds of those involved and those touched by the project. The positive message it sends was valued by many partners and seen as at least planting a seed for potential genuine behavioural change.

While the project increased awareness of the IP tool among MAs and CAs, their continued use depends on many factors, including the political climate and appetite for IPs from higher echelons of power. In several countries, partners reported there were changes in government whereby corruption in general and IPs in particular were deprioritised: “So much depends on the persons that we ended up working with. There is an impact, maybe medium term. The people that we worked closely with at the CA, they expressed that they liked the cooperation but if the management changes, I’m not sure it would sustain” [Implementing partner].

**Future Funding for IPs**

Funding remains a significant issue for the sustainability of the IP approach more generally. Partners felt that although the issue of financial sustainability was a known issue and was on the radar from the outset and discussed several times throughout the project, in many cases they did not feel confident that the project had established a coherent financial sustainability solution to continue with the use of IPs in a systematic way to protect EU funds after the project ends. Interviews confirmed that decisions on the future financing of the IPs are highly political in the EU context, with the key decision-makers being DG REGIO and Member States. DG REGIO’s position is that future IPs need to be financed by the Managing Authorities. During the final project conference, it was announced that the IPs can be covered by the technical assistance budget included in the operational programmes.

While coming late in the project (in March 2021 and May 2021) respectively, the IP Strategic Brief which targets decision-makers and the ‘Integrity Pacts & EU Budget 2021-2027 Advocacy Kit’ which targets potential monitors, both provide useful and hands-on guidance and templates for the replication of IPs and ideas around their financing. A ‘business model’ approach has been pursued by at least two project partners (Hungary and Czechia), whereby the CA (or their oversight body) finances IPs. The benefits of this approach include almost guaranteed high level of buy-in and political will from the CA (due to their own finances being involved) but should be considered how such an arrangement may limit advocacy opportunities. The approach necessitates strong negotiation skills on the part of the monitor to ensure that their independence is assured, and to ensure that payment takes place even in the event of the IP being cancelled (due, for example, to the monitor withdrawing as a result of the

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81 This was also discussed in detail at the Partners’ Validation Meeting and put forward as a promising funding solution.
IP’s conditions not being fulfilled). While two partners have successfully negotiated such IPs, several other partners reported meeting with resistance from national authorities when the issue of financing IPs from national authorities’ budgets was broached. There is an example from the Italian monitors working together as part of an observatory (composed of Italian Associations and CSOs) to monitor Next Generation EU Funds, where they are promoting the tool for potential use. At a global level, the securing of the Siemens Integrity Initiative grant by TI-S for increasing adoption of IPs in Argentina, Romania and Spain is an indicator of sustainability of the gains from the project.

At the time of writing, TI-S is currently in talks with DG REGIO and mapping out the needs in Europe to increase the application of IPs. In addition, they are working with a multilateral developmental investment bank on a potential application of IPs in the field of green investments..

8. Gender and Inclusivity

To what extent was the project planned and implemented in a gender-sensitive and Inclusive way?

Gender considerations and best practice were not foreseen or incorporated into the original design of the project nor a context or sectoral-specific gender (inclusiveness) analysis to inform project design. A useful tool to assess current efforts and identify future goals for the project’s gender inclusion efforts is the Gender Results Effectiveness Scale (GRES) (See Annex 2 for explanation of the GRES categories). On the GRES scale, the evaluators found the IP project was ‘Gender Blind’.

During the interviews implementing partners did not report any gender barriers that they faced during implementation of the project however, one implementing partner (M) did mention that the sector which their IP was monitoring could present barriers to female monitors, given the overwhelming proportion of men involved in the project.

While specific benefits of the project for various genders were not evidenced during the evaluation, some interviewees noted that women are a beneficiary of the improved, more efficient and high-quality procurement processes, and those that bring value for money. Citizen outreach and engagement also included all genders even though targeted engagement of women in citizen engagement aspects of the project were not found. The evaluators note that the engagement of students in monitoring brings specific risks around child safety which should in future be identified early (prior to engagement) with necessary steps taken to avoid. Health and safety, sexual harassment and gender-based violence risks, and disability inclusion should also be incorporated into planning for monitoring staff and citizens travelling to sites or events.

A good example of a benefit of the project in terms of inclusiveness comes from Amapola who made several recommendations to improve the outcome of the project for disabled groups. Indeed, some interviewees noted there would be opportunities for future applications of this project to support gender inclusivity via the selection of projects. Incorporating these considerations into the selection of projects to be monitored would support targeted and meaningful engagement of target groups in the monitoring.

82 This section refers to gender, which is understood in an inclusive manner in all diversities.
Conclusions

This report has summarised the findings of the evaluation of the IP EU project, funded by DG Regio, which sought to “explore and promote the use of Integrity Pacts for safeguarding EU funds against fraud and corruption, and as a tool to increase transparency and accountability, enhance trust in authorities and government contracting, contribute to a good reputation of contracting authorities, bring cost savings and improve competition through better procurement.” The total value of the project was over €8.8 million and it was implemented over 6 years. The evaluation was undertaken between December 2021 and April 2022, and it assessed the project according to the evaluation criteria of relevance, pilot project design, coherence, efficiency, effectiveness, outcomes & impact, sustainability and gender & inclusivity. The scope of the evaluation included the work undertaken by TI-S as project managers, the TI-EU office and the 18 integrity pact projects. The main conclusions are:

Relevance: the evaluation found that IPs are considered to have continued relevance for promoting integrity in public procurement and as a real-time preventative tool against corruption. They can play a role in the future protection of EU funds, along with other tools and strategies, and when employed in certain circumstances where they can be most effective. The project showed flexibility over its lifetime allowing adaptations to be made to improve impact and sustainability of results.

Pilot Project Design: the project intended to promote learning for the future roll-out and mainstreaming of IPs. While learnings were achieved, the high variation between the cases did not support this ambition as findings are not necessarily generalisable. A detailed MEL system was developed which made some key adaptations in response to partners' needs and supported learning. There was a lack of planning for sufficient MEL resources at TI-S and at the partner level, with some reflections that the system (along with other reporting requirements) was overly burdensome. Quality controls on collected data were missing centrally. The TOC was at the IP level rather than for the project as a whole. It did not include a pathway for change for IPs in highly corrupt contexts whereby the IP gets cancelled.

Coherence: good partnerships were formed with organisations working in this field with some local, regional and international advocacy successes, although international advocacy lost some momentum over the course of the project.

Efficiency: the overall budget showed just a small underspend. Partners generally found their budgets sufficient. The project internalised the learning that in future the costs of monitoring vs. financial size of the monitored procurement projects, could be a consideration at the selection stage. Extensions were required and reasonable due to delays in implementation and the COVID-19 pandemic, but staffing shortages left key roles unfilled.

Effectiveness: Specific Objective 1 had mixed achievement of results, while Specific Objectives 2 and 3 were largely achieved. Assessment of effectiveness was challenged by the lack of an overall project logframe and lack of specific indicators for some areas of work. The Specific Objectives also employed ambiguous terms and to some extent were at odds with the goal and project design. Examples of
improved integrity and identification of risks via the monitoring were found. Citizen and media engagement were areas with lower levels of results found than expected.

**Impact:** Examples include in policy/legislative recognition of IPs and wider promotion and use of IPs in their country.

**Sustainability:** Some changes show high likelihood to last and positively this project has contributed to the creation of a knowledgeable and engaged network of experts on IPs and public procurement who have contributed to national dialogue. The project team has had effective dialogue with stakeholders on the continuation of work on IPs.

**Gender and Inclusivity:** The project did not incorporate this into its planning and the evaluation concludes it was gender-blind on the GRES scale.

The key findings, and the recommendations from the evaluation are as follows:

**Key Findings**

1. **IPs are relevant for promoting integrity in public procurement - including future EU funds, as part of a bigger toolbox of options.**

   There is continued relevance of IPs for promoting integrity in public procurement and acting as a preventative tool against corruption. IPs are, however, only considered relevant in certain circumstances and should be used as part of a broader toolbox of options (including open data, detection and enforcement techniques). They are considered to have relevance for future EU funds (such as MAFF and NextGenerationEU) given the large amounts of funds that will be flowing from the EU to the national level. The new Red Flags Tool developed under this project shows promise for identifying at-risk procurements where IPs can be applied to cases where they can be most effective.

2. **Some partners showed good results on improving integrity and reducing corruption risks in monitored IP projects, and some wider policy-level impacts were also found.**

   **Other partners faced challenges, resulting in overall mixed results.**

   The evaluation found several examples of positive improvements in integrity/reduced corruption in the monitored procurements and examples of medium-long term changes were identified including incorporating IPs into national anti-corruption strategies, OGP national strategies and a company adopting a whistle-blower policy. The publishing of regular monitoring reports (by most monitors), along with communications and websites on the project (supported by TI-S) helped contribute to improved transparency. Factors hindering achievement included: limited engagement with companies or professional organizations (i.e the International Federation of Consulting Engineers, FIDIC), difficulties engaging citizens and the media, disinterested/resistant CAs and delays to procurement projects.

3. **The project generated a bank of knowledge and learnings on IPs and their usages.**

   The knowledge products generated via this project (under specific objective 3) have added considerably to the knowledge base on IPs. Some of these products show that TI has already reflected upon and recognises several issues raised in this evaluation report - such as the importance of careful case selection and citizen engagement challenges. This has helped improve the knowledge base on
the IP tool in a sustainable way, with the potential to be operationalised in future iterations. Given many of these products came at the end of the project, their contribution to change cannot fully be assessed at the time of this evaluation.

4. **A network of experts on public procurement has been created.**

A key highlight of this project was its creation of a knowledgeable network of experts on procurement and integrity issues across Europe, who show keen interest and commitment to continuing promoting integrity in public procurement. Some partners are now seen as key experts on the issue of public procurement and have utilised their expertise in initiatives related to the new EU funds and COVID-19 corruption allegations in procurement.

5. **There were diverging expectations between different groups regarding the project’s goal, objectives and outcomes.**

The evaluation found a lack of alignment between the project’s goal and specific objectives - which set high ambitions for improved integrity and transparency across all IPs, the aim to undertake a pilot for the purpose of mainstreaming (which demands high standards of comparability between cases) and the implicit aim to learn from a range of contexts, including those where IPs are less suitable, via a bottom-up and highly context-specific approach to implementation. There was no common definition of success among the various stakeholder groups with some opting for a monitoring lite approach. The lack of a logframe and overall project Theory of Change (ToC) have likely contributed to diverging expectations between partners, TI-S, TI-EU and the donor.

6. **The Project Management team delivered well despite challenging circumstances, but the lack of human resources to deliver on certain aspects compromised impact.**

The TI-S project management team maintained momentum despite staffing shortages and high turnover, focusing largely on building capacities of the monitors, facilitating transfer of capacities from more experienced IP implementers to new-comers, and supporting the set-up of monitoring agreements at the start of the project. They delivered many important learning and communication products in the second half of implementation. However, some key functions such as centralised MEL quality control of monitoring data and international/regional advocacy suffered because of task overload and lack of strategic guidance from TI-S leadership. TI EU’s relatively minor role in project delivery and advocacy was a missed opportunity.

7. **External partnerships required greater strategic visioning and leadership.**

Coherence with external initiatives in the open and clean contracting space by TI-S began strongly but was limited in the second half of implementation, due to staff shortages in the team (including at the senior strategic level) and lack of strategic involvement by TI-S leadership. The engagement by TI-S with organisations such as the Basel Institute on Governance (BIG) and the UN Global Compact (UNGC) has supported greater awareness of the tool and examples exist at the national level of successful collaborations with other organisations, some of which were supported by TI-S and used to amplify TI-S’ advocacy positions.

8. **The project extensions were needed and justifiable. Cost-benefit analysis has practical challenges. Some projects had high monitoring costs compared to procurements monitored.**
The total project budget currently shows only a small underspend, and the cost and no-cost extensions were found to be justified given the delays in the signing of IPs, in the procurement projects roll-out and due to COVID-19. Conclusive analysis of the cost-benefit of the project is not possible with the data available because of the structure of the budgets but also due to conceptual challenges given the preventative nature of the tool. A small number of IPs (4) were found to show high IP project costs in proportion to the total value of the procurements being monitored (i.e. more than 20% of the procurement values), which raises questions about value for money, particularly in two of those specific cases, although they were acceptable to the donor and the project team for learning and capacity-building purposes.

9. **Despite the benefits found by undertaking multiple IPs in multiple countries simultaneously which was previously untested, it has revealed implementation challenges.**

In trialling this approach, some aspects of the projectisation of IPs from the process for the selection of projects, the timelines for monitoring, comparability challenges between contexts, to the funding incentives for monitors to stay engaged despite unwilling counterparts were found to reduce overall project impact. These offer key learnings for the future application of IPs in the context of donor funded projects.

10. **Gender sensitivity and inclusivity was not part of the project design.**

Gender inclusivity and mainstreaming was not part of the design or planning process, nor included during implementation.

**Recommendations**

1. **Develop an advocacy strategy for improving integrity and corruption-risk management in Public Procurement for EU-funded projects, which positions IPs as one of a toolbox of options which can be deployed.**

   Capitalise on the increased interest since COVID-19 in improving integrity in public procurement at the EU level and the increase in funds which are being distributed to member states. Develop an advocacy strategy which puts promoting better practice in procurement and corruption risk-management as the central goal and recommend a range of approaches (not just IPs) to identify and correct problems when found. Ensure IPs are only deployed in the right conditions informed by the learnings of this pilot. Collaborate with other INGOs and TI-EU based on their expertise.

2. **Ensure future deployments of IPs in the context of multi-country projects address challenges of projectization of IPs**

   When considering implementing future IPs as part of a donor-funded project, ensure the strategic approach to their deployment takes note of challenging timelines, the importance of case selection, securing strong agreements with CAs and ensuring monitors are not disincentivised to ‘walk away’. Strategize on alternative funding models which avoid disincentivising monitors. Factor in efficiency and value for money into case choice. Ensure minimum standards are defined for clauses IPs must
contain and at what point a monitor should withdraw and incorporate an awareness of the incentives of the monitor.

3. **Revise and update the goal of the IP tool to reflect the learnings from the pilot.**

Engage experts, practitioners and implementing partners to refine and focus the goal of an IP on more realistic expectations. Revise the ToC to reflect different conditions in which monitors find themselves and include a pathway for change for IPs which are cancelled/terminated due to non-compliance or corruption issues found.

4. **Consider different approaches to IP project selection based on the intended goal of the work.**

Consider selecting IPs to further a specific policy objective, to further integrity on a specific issue or in a thematic area, or based on a risk-based assessment, to ensure IPs are deployed where they can have more advocacy impact. Consider also shorter, time-bound IPs or for specific parts of a procurement project given the temporal and staffing challenges found when monitoring entire procurement processes.

5. **Ensure clarity of project goals, measurability of change, indicators and utilise Logframes to manage expectations, while maintaining flexibility.**

Ensure change indicators are S-M-A-R-T. Incorporate the monitoring of changes resulting from activities from all levels of the project - including the work of TI-S and TI-EU. Utilise Logframes or other similar modes to ensure there is clarity on what changes the project aims to contribute to, with baseline data and targets set which allow for attribution of change to project activities. Maintain a good level of flexibility to changing circumstances, as found in the IP EU project, to ensure course corrections can be made when needed.

6. **Distribute and specify roles and responsibilities reasonably to all parties from the outset**

Given that TI-S as project coordinator was found to be responsible for a multitude of areas of work, some of which were beyond its capacities and could have been better carried out by other stakeholders within the project, future iterations of the project should avoid overburdening any single stakeholder group with multiple functions, especially when they do not have the human resources to deliver. Assess where strengths lie and ensure capacities are there to be able to deliver on the various assigned roles, and show flexibility to adapt when changes occur. Ensure that there is sufficient oversight and quality control undertaken. Consider decentralisation, such as devolving advocacy to the TI-EU office, MEL quality control or training/capacity building to partners who show specific strengths in some areas.

7. **Broker partnerships with important organisations in the field of public procurement**

Given Integrity Pacts/civic monitoring to reduce corruption in public procurement is a niche topic with relatively limited expertise globally on this area of work, it is important to collaborate with organisations who are seeking the same advocacy outcomes. Share learnings on what works, and what does not work. Include stakeholders such as professional associations, who may be interested
in supporting transparency and accountability in public procurement such as National Associations of Engineers etc.

8. **Capitalise on the knowledge and capacity built among the implementing partners on IPs.**

If capacity is not used shortly, it will be lost. New projects which can utilise skills and knowledge on improving integrity in public procurement should be secured. TI-S should consider supporting the deployment of a ‘train the trainer’ or ‘train the civic monitor’ approach, to allow implementing partners to share their knowledge and capacity gains with other potential civic monitors.

9. **Promote new knowledge tools.**

Given most of the knowledge products were produced at the end of the project, continue with dissemination of those and monitor their impact and use.

10. **Harvest and implement learnings on media and citizen engagement so that these aspects are incorporated only when relevant and add value.**

Undertake a detailed study on the causes of lower achievement in media engagement via this project. Incorporate lessons in this area which have been highlighted through this project, conduct a feasibility assessment, and develop risk-mitigation strategies for media and citizen engagement in future IP iterations. Learn from other monitoring/civic engagement initiatives on other themes (i.e. environmental impact, budget monitoring) to learn what works/what doesn't work.

11. **Increase resources for MEL for projects of this size and implement learnings from this pilot for designing appropriate approaches**

Ensure large projects have sufficient staffing for MEL. Consider separating data collection for project reporting for the donor from data collection efforts required for pilot project testing. Ensure potential evaluability issues are considered in the design phase and are reflected into the design of the MEL system.

12. **Incorporate gender sensitivity and inclusivity, as well as leave no one behind considerations, for future multi-country projects.**

TI-S should ensure gender inclusivity and mainstreaming assessments are incorporated in the planning stage, and gender and inclusivity considerations are incorporated at all stages of project development and implementation. Empower diverse groups also as monitors.

**Best practices and lessons learnt**

- The original intention of the project - of undertaking a pilot prior to wider roll-out, is an example of best-practice in project design. However, given the intention was to inform a wider role it would have benefited from being planned with expert support from a research institute, academic institution or think tank to ensure that the design was fit for purpose.
- The project developed and implemented an experimental MEL system, which incorporated some best practice approaches to outcome harvesting and most-significant change. Partners appreciated the moments where they were involved in the development and design of the systems.
• Partners who had specific colleagues in charge of MEL reporting tended to be most positive about the system. Ensuring good capacity for MEL at the partner level was not included in the original guidance to monitors, which caused difficulties later for monitors with less expertise.

• Interventions which are grounded with an initial risk assessment and context analysis ensure project plans and activities meet a specific need. The learnings from the IP EU project can inform future IP selection. Partners who had initial contact with the CA prior to application avoided the risk of low engagement or interest from the CA.

• An IP must ensure clear rules of disengagement. Some partners were unclear about when they should ‘walk away’ and would have liked a more clearly specified guidance on when they should terminate an agreement.

• Undertaking a stakeholder mapping exercise (as ActionAid did) helped identify key groups who might be interested to engage in civic monitoring. This ensured engagement was more targeted to those who have an interest.

• There is a difference between citizen ‘engagement’ and ‘dissemination’. Not all stakeholders need to be heavily engaged but it is important to keep them informed. Mapping can be undertaken to identify potential stakeholders who can be kept informed throughout.
Annexes

Annex 1: Project Theory of Change

Goal

Integrity Pacts contribute to clean public procurement processes that deliver value for money and are trusted by the general public, in the targeted countries

KEY ASSUMPTIONS:
- Strengthened public oversight, accountability, transparency, and public participation in public procurement processes will lead to cleaner procurement processes.
- Cleaner procurement processes will increase public spending’s value for money.

**POLICY AND INSTITUTIONAL CHANGE**

**Improved enforcement of policies:**
7. Improved enforcement of public procurement standards/policies by governments in the targeted countries
8. Improved application of corporate governance standards in public procurement practice by bidders in the targeted countries

**Policy adoption and amendment:**
9. Improved public procurement standards/policies adopted by governments in the targeted countries
10. Improved (corporate governance) standards in public procurement adopted by bidders in the targeted countries

**Better institutional processes:**
11. More transparent, participatory and accountable public procurement processes implemented by governments in the targeted countries
12. Improved integrity performance by bidders in procurement processes in the targeted countries

**BEHAVIOUR CHANGE**

13. Strengthened engagement and oversight of public procurement processes by the public and especially by intended beneficiaries and/or those that are most affected in the targeted countries
14. Strengthened oversight of public procurement processes by the media in the targeted countries

**Intermediate Outcomes:**

1. Strengthened integrity capacity of targeted contracting authorities and successful bidders
2. Strengthened prevention, detection and resolution of irregularities in targeted public procurement processes
3. Increased trust among targeted contracting authorities, successful bidders, and the public
4. Increased good-will of targeted government authorities and successful bidders for implementing (systemic) reforms to improve public procurement processes
5. Increased capacity and willingness of the targeted public, especially intended beneficiaries, to engage in monitoring public procurement processes and reporting perceived risks

**Short-term Outcomes:**

- Integrity Pacts in place and agreed upon by Government and Bidders
- Trainings provided to IP stakeholders (public officials, bidders, media, civil society) to facilitate their engagement in the IP process
- Regular IP monitoring reports published
- Irregularities in targeted public procurement processes identified and recommendations provided
- Systemic problems in public procurement identified and recommendations provided
- Improvements to procurement policies, standards and processes promoted to governments and successful bidders
- IP findings and best practices shared with the public, media and CSOs
- Channels for affected citizens consultation / citizens participation in Integrity Pacts in place and promoted
- Citizens’ complaint and feedback mechanism for Integrity Pacts in place and promoted

**Outputs:**

- Increased capacity and willingness of the targeted public, especially intended beneficiaries, to engage in monitoring public procurement processes and reporting perceived risks

**KEY ASSUMPTIONS:**
- The IP documents are of sufficient quality (comprehensive, clear, relevant to the specific context)
- The training provided are relevant and of sufficient quality and quantity to build the necessary capacity of IP stakeholders
- Bidders and governments are committed to the IP process
- The monitoring process is independent, sufficiently resourced to be effective, and the findings and recommendations are well-grounded and actionable
- The IP process is constructive and facilitates the building of trust among stakeholders
- The public and media can be motivated to participate in the IP process
Annex 2: Gender Results Effectiveness Scale (GRES)

The Gender Results Effectiveness Scale

- **Gender Negative**: Result had a negative outcome that aggravated or reinforced gender inequalities and limiting norms.
- **Gender Blind**: Result gave no attention to gender, and failed to acknowledge the different needs of men, women, girls and boys, and other marginalized populations.
- **Gender Targeted**: Result focused on the number of women, men, or marginalized populations that were targeted (e.g. 50/50 representation).
- **Gender Responsive**: Result addressed the differential needs of men, women, or marginalized populations and focused on the equitable distribution of benefits, resources, status, rights, etc. but did not address root causes of inequalities.
- **Gender Transformative**: Result contributed to changes in norms, cultural values, power structures and the roots of gender inequalities and discriminations.
## Annex 3: Documents reviewed as part of this evaluation

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<td>Clean Contracting Advisory Committee Meeting Minutes (2017)</td>
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<td>Ip Outreach and Communications Strategy (2016)</td>
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<td>Citizen Engagement in Public Contracting (2021)</td>
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<td>Guidance for setting up the Independent Monitoring Component</td>
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<td>Integrity Pacts in Public Procurement : An Implementation Guide (2013)</td>
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<td>Simister, N. Scholz, V. Qualitative Comparative Analysis (QCA), INTRAC 2017</td>
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Annex 4: Case Studies

The evaluation explored 4 case studies in-depth (3 based on specific medium-long term impacts of the IPs, and 1 thematic case study). The case studies were selected in coordination with the project team as those which represented high chance of learning of how IPs can support long term change, while also investigating the delivery of monitoring reports by the implementing partners as this had not been done in detail during the course of the project.

Case Study 1: Monitor’s advocacy leads to Contractor adopting strong Whistleblowing Policy (Poland)

In general, the implementing partners of the IP EU project reported difficulties engaging substantively with the successful bidders (the contractors) outside of the formalities of the IP. Partners described companies variously as ‘indifferent’, ‘neutral’, ‘cautious’ and in cases where the contractors were more interested in the IP, they were often described as ‘cooperative’, ‘constructive’. However active engagement between the monitor and the contractors, outside of the necessary formalities envisioned in the IP, was the exception rather than the norm. One example to the contrary was found in Poland, where the implementing partner - Stefan Batory Foundation (SBF) - successfully engaged with the main contractor involved in their IP and helped increase that contractors’ internal integrity capacity.

When the SBF was negotiating the terms of the IP agreement, they had some concerns about ensuring adequate protection for potential whistle-blowers on both the Contractor’s and the CA’s side. As SBF’s first monitoring report stated: ‘The Foundation had an ambitious plan to add extra safeguards in the Pact to help protect individuals who report fraud or irregularities, or the risk of such misconduct in a monitored project.’ The CA was concerned that including non-standard clauses in the contract could prove problematic from a legal standpoint. Notwithstanding this, it was agreed that the contract with the contractor would have a sample ethical management policy and a whistle-blower protection procedure attached to it. The policy was drafted by the SBF’s experts to be adopted by the contractor (if the contractor had not implemented similar procedures earlier). Clauses regarding safeguards to protect whistle-blowers were also embedded in contracts with subcontractors.

The contractor ultimately went further than the obligations of the IP to adopt and implement the policy. As this was a novelty for the company, they consulted SBF about concerns, particularly in the area of data protection. SBF provided them with detailed guidance on the retention of data from whistle-blower reports. Following this engagement, the company’s management launched

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84 This case study is based on documentary evidence including primary sources (correspondence between the partner and the contractor) and secondary sources; interviews and follow-up correspondence with the implementing partner and correspondence with an external stakeholder (contractor).

85 It should be noted that the contractor is currently in a legal dispute with SBF regarding an alleged conflict of interest, and that the sustainability of the positive working relationship between the monitor and the company, exemplified by the work around the ethics infrastructure of the company, is fragile.
a process to develop the Whistle-blower Protection and Ethics Management Policy. Initially, it only covered the monitored contract but later in 2019, it became part of the company’s Ethical Management Policy, along with other anti-corruption standards and became mandatory throughout the company in 2019. SBF was also asked to comment on this draft policy and provided substantive feedback which was taken on board. A planned training to be delivered by SBF to educate the employees about the new policy was postponed due to the pandemic.

The contribution from SBF to this change was considered significant by SBF but as ‘medium contribution’ by the contractor, indicating the change may have happened without their involvement but would likely not have been of the same quality. It should also be noted that the contractor was aware that Member States’ obligation to implement the EU Directive by 23 October 2019 on the protection of whistle-blowers (PE/78/2019/REV/1) and that by then, the creation of these systems would be mandatory for medium and large companies. Their decision to adopt the policy before it became legally mandatory to do so, was partly due to their involvement in the IP and the targeted engagement and advocacy of the SBF. The strong clauses related to all parties’ ethical infrastructure was certainly a contributing factor to the success in this case.

Case Study 2: National Anti-corruption Strategy recognises IPs as good practice for clean contracting

Portugal provides an interesting case study because it is a clear example of where the implementing partner (TI Portugal) has succeeded in plugging the IP into wider policy debates around anti-corruption in the country. Given the communication challenges posed by the technical nature of IPs, TI Portugal made notable progress in drawing attention to the issues.

Against the backdrop of a reform to Portugal’s Public Procurement Code, which increased the threshold that allows for direct awards, TI Portugal advocated strongly to broaden oversight of government contracts. They embarked on a sustained advocacy effort which bore fruit when in the country’s most recent National Anti-Corruption Strategy, the government included an emphasis on the need to reinforce the monitoring of public expenditure, including government contracts. TI Portugal used compelling arguments, emphasising the risks that the legal changes brought concerning transparency, accountability and competition, particularly to upcoming investments funded with EU recovery funds. They focussed minds on Portugal being the third largest recipient of the EU recovery funds.

Through active communication with legislators, journalists and authorities and their formal participation in the strategy’s consultation process, TI Portugal presented arguments and incentives to support the recommendation and recognition of IPs as a good practice. Additionally,  

86 This case study is based on documentary evidence; interviews and follow-up correspondence with the implementing partner and correspondence with an external stakeholder (government official).
they managed to embed a similar commitment in the second Open Government Partnership (OGP)’s national action plan, which mentions the importance of civic monitoring approaches and considers the implementation of IPs. A government official heavily involved in the OGP process who was interviewed for this evaluation considered the contribution of TI-Portugal to this change to be significant, describing it as ‘essential’. The IP alone does not often quickly translate into systemic change - however, the knowledge gained by TI Portugal through the IP project increased the organisation’s advocacy capacity and reputation in the specific area of clean contracting. The implementation of the policy commitments remains to be seen but the policy change is a good example of using the IP for a broader anti-corruption drive.

Case Study 3: Integrity Pacts Improving Procurement Processes and the project received National recognition of IPs

Transparency International Romania and the Institute for Public Policy jointly implemented an IP project to monitor the procurement processes surrounding an update to the land register (eTerra) and legal cadastre register. Romania already had an existing register - which is used for real estate market transactions and is used by landowners to access agricultural funds. However, it included only 12% of legal administrative areas leaving many property owners at a disadvantage. The aim of this EU-funded procurement project was to update the register with over 5,700,000 mil. hectares across over 600 municipalities. This project had not only a very high total value of over €300,000,000 but was reported to be of very high interest and importance for development in the country, and would benefit approximately 200 million citizens.

The partners entered long discussions at the outset regarding the terms of the IP with the CA, who was considered to be enthusiastic and showed good will for the Integrity Pact while ensuring the IP was in line with the law and regulations. During the monitoring, TI-ROM/IPP observed a lack of interest from bidders in specific lots, so the monitors made recommendations to the CA to undertake a market consultation and investigate barriers to bidders participating in these lots. The CA followed the advice and met with firms to gather the information needed and make adjustments. This resulted in lots receiving a higher number of bids, thus supporting a more competitive procurement process. The monitors also commissioned a background check on successful companies which showed a potential for conflict of interest. Based on this the monitors provided recommendations to address this during the implementation of contracts and provide training for cadastre offices to improve their understanding of this risk, which show signs of sustainability.

The evaluation finds evidence that the monitoring of this procurement increased competition and fairness, enhanced transparency and accountability and supported institutional changes in the CA. The commitment from the authorities to bring about positive change were reported to have been key for the take up of the recommendations and address irregularities. They felt the IP helped build trust

87 https://www.pactedeintegritate.ro/ro
88 Project Monitoring Data Airtable.
in their decisions and in the delivery of this project. Staff turnover - as elsewhere in government administration - is high and presented a barrier during IP delivery. The CA appreciated the good cooperation with the monitors and their expert knowledge on various aspects of procurement: contracting strategy, awarding criteria, and in the implementation of contracts showed that their involvement was worthwhile and added value.

Government engagement in this project was already high at the start, with monitoring of IPs included in the previous National Anticorruption Strategy. The monitor did continue to promote the importance of civil society monitoring of public procurements during the consultations for the new National Anticorruption Strategy, which was adopted in December 2021 which includes this as a strategic priority. This suggests a longer-term sustainable impact of the work in Romania.

Case Study 4: on Monitoring Reports

Over the 6 years of the EU IP project, the independent monitors produced 76 monitoring reports, which now constitutes a large repository of information about the IP projects, the procurement processes and the ups and downs of the monitoring processes. The publication of these reports was a key aspect of the project, understood as contributing to achieving Specific Objective 2: Ensure transparency and access to information in 18 projects co-financed by EU Structural and Cohesion Funds. This knowledge bank of monitoring reports is likely to be of good use to other organisations embarking on a civic monitoring project or an IP.

Number of Monitoring Reports by Monitor

A review of the 76 monitoring reports shows that reports were produced for 15 out of the 18 IPs. The number of reports produced over each IP’s lifetime ranged from 0 reports (for 3 IPs) to 11 reports (for 1 IP), with a median of 4 reports produced per IP. The length of the monitoring reports varied widely as well, ranging from 2 pages to 109 pages, the median value being 16 pages. The length depended largely on whether the monitor chose an approach of producing a larger number of concise reports over the course of the IP, each covering individual phases or themes, or a smaller number of consolidated reports covering several phases of the IP or even a single report on the whole IP.

In the case of one IP which suffered severe delays on the part of the CA and never got underway, no monitoring reports were produced. While this is understandable, as the partner had not undertaken many activities due to the delay, the publishing of a monitoring report could have helped raise awareness of the delay to a wider audience, motivated the CA to better engage with the monitor to move the process along, as well as supporting the wider aim of improving transparency. In another

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90 The project’s internal monitoring data counts 80 reports. However, upon review, it was found that 4 of these do not meet the standard of a monitoring report (these were two infographic spreads, one excel sheet and one website, which was not accessible to the evaluators). 17 of the Monitoring reports had been translated into English and these were reviewed in most depth for this case study. The remaining 59 documents were translated by the evaluators using online software and received a lighter review of structure and content.

91 For 1 IP the reports were not available at the time of writing, for 1 the report is pending approval of the CA and in the last case, they are included in the progress report to the donor only.

92 Given that there are two very long reports (104 pages and 74 pages), the median is more instructive than the mean/average length.
case, a monitor published their report on a website which was found at the time of analysis to no-
longer be accessible due to a lapsed security certificate, highlighting the importance for producing
standalone reports for sustainability of knowledge generation.

Structure and Purpose
A guidance document produced by TI\(^93\) states clearly that the project partners were free to approach
the monitoring reports as they saw fit, that there was no ‘correct approach’ and that no prescribed
structure or content was envisaged.\(^94\) This was in line with the project’s general approach of allowing
flexibility to adapt the IP to specific contexts.

Among the non-exhaustive list of potential objectives of such monitoring reports included in TI’s
guidance are:

- Reporting publicly on compliance with the law / best practices;
- Reporting publicly on compliance with the IP;
- Reporting on the partner’s role as monitor;
- Using the report as an opportunity for broader awareness raising and / or advocacy on key
  reforms beyond CA / bidder.

Indeed, the independent monitors saw various functions for the monitoring reports within the context
of their IP project. The monitors were generally consistent with the format across the whole series of
reports they produced for a particular IP. 27 of the 76 reports (otherwise stated, reports for 6 of the
15 IPs for which reports were produced) stated explicitly a particular purpose of the report within the
introduction of the report, which was helpful to understand the target audience and the choices made
in terms of approach, content, and structure of those reports. In some of these cases a purpose was
mentioned but it was found to be rather vague. For example, in one case the stated purpose was to
‘inform a wider discussion regarding the methods of the civil society monitoring of public procurement’,
however it was not made clear which groups/stakeholders were the targets for promoting this wider
discussion. In 49 of the reports reviewed (reports relating to 9 of the IPs), the purpose of the
monitoring report was not explicitly stated, even if in many of those cases the monitor had a clear
purpose in mind and assumed that this was known to the reader. Stating the purpose explicitly forces
the monitor to focus on the target audience of the report and in some cases, the lack of a stated
purpose echoes through to a lack of a clear target audience for the monitoring report.

The various purposes of the reports, as interpreted by the evaluators, are summarised as follows in
Figure 15 - noting that most reports exhibited more than one purpose.\(^95\) The most common purpose
found was reporting publicly on compliance with the IP (in line with the objective of increasing
transparency around PP). The second most common purpose was reporting publicly on compliance
with law/regulation or best practices, which was seen in 52 of the 77 reports. Thirdly, 48 of the reports
either explicitly or implicitly aim to report on the role and activities of the monitor themselves and just
under half of the reports (34) exhibit an aim to raise awareness or be used for advocacy on key
reforms among a broader group of stakeholders.

\(^93\) Guidance for Setting Up the Independent Monitoring Component
\(^94\) “There is little guidance on what such a report should include, and different monitors have taken different
approaches” quoted from Guidance for Setting Up the Independent Monitoring Component pp. 38
\(^95\) This graph is based on the evaluators’ interpretation of the texts and is not objective. As mentioned above, the
purpose was often left implicit by the monitor and so there is room for different interpretations. The chart should
therefore be seen as indicative rather than conclusive.
Figure 15: Chart showing no. of monitoring reports by their purpose(s) (implicit/stated), as interpreted by evaluators. N=76.

In the case of one IP, only one monitoring report was produced and it was presented as a joint publication between the independent monitor and the CA. This was due to restrictions placed on the monitor via the IP agreement and stemmed from limited buy-in from the CA in the IP. The evaluators note that this is not in line with the usual approach taken in an IP, whereby a key characteristic of the monitoring reports is that they reflect the independence of the monitor. An additional purpose seen across several of the monitoring reports is increasing knowledge and awareness of the IP itself as an anti-corruption tool. Given the technical nature of IPs and that they are not well-known in certain stakeholder groups, providing a brief overview of IPs, what they are and how they are being applied in the country context, is a good example of widening the knowledge on IPs as a tool.

Structure and Content
The draft template provided by TI in the guidance documents was intended for inspiration and not to be followed to the letter. The template was reflected only loosely in the reports reviewed, which had various structures chosen by the monitors. Reflections from the project team suggest closer guidance may have been useful for partners to align expectations. The evaluators noted in particular that the proposed section *Part 5: The bigger picture. What are we learning and what needs to change?* was not included in any of the reports reviewed, although lessons learned were often reflected in different ways in the report, though not consistently. This would have been a useful ‘mandatory’ section as the evaluators found the approaches to recording lessons learned varied widely in scope, quality and clarity and given the pilot nature of the project, more uniformity here would have been useful. Indeed, it would also add to the usefulness of the monitoring reports for a wider audience for collective action.

Visual engagement
Across the 15 IPs for which reports were produced, the series of reports for 9 IPs were found to have strong visual appeal, by including infographics and pictorial elements to break up the text and
communicate engagingly. The latter usually used professional design templates and plain language messaging, which is particularly important when the purpose of the report (stated - or assumed) is broader awareness-raising.

This assessment of the monitoring reports does raise a question of whether any monitoring report in this format (even shorter ones) is going to appeal to a wider public audience. Given the technical nature of the topics at hand we find it quite unlikely. Other formats to engage the public (blogs, videos, online content) have been used with success by monitors and reflections for future IP projects should adjust the aim of monitoring reports to instead improve transparency among those directly affected by the IP and the PP.

**Timeliness of publication**

The evaluation interviews revealed challenges which some partners faced in the publication of the monitoring reports. In one case, the quality of the reports was too low for publication and at the time of fieldwork, they were being redeveloped to be of publishable quality. In another case, while the publishing process for the reports was straightforward, they could not be published in a timely way due to the monitor's lack of real-time access to information. Two monitors reported facing significant challenges to the publishing of the monitoring reports. In one case they needed to be approved by the contracting authority before publication while in the second, the procedure for approving full monitoring reports was reported as being ‘lengthy and difficult, with a long negotiation with all parties about the formula and content over many months’. In most of these examples, the evaluators find the monitoring reports likely did not contribute to enhanced transparency and access to information. In another case, the monitor exposed significant problems they faced with monitoring and the corruption risks they exposed. While this is very important to publicize in the monitoring reports, given the reports came at the end of the procurement processes which they were monitoring and not during monitoring, the reports likely missed the ‘stick’ element of providing a motivation for CAs to accept recommendations. A higher frequency of reports in this example (which includes broader advocacy/strategic recommendations) may have been beneficial. Guidance documents should reflect on the importance of ‘timely transparency’ and that information can have more power when given in real-time or on a frequent basis rather than at the close of the project. There was scope within this project - while still being aligned with the bottom-up approach - for more consistency in frequency of MR publications between monitors, and TI should consider increasing requirements related to this in future multi-country projects.

**Translation**

In the case of 5 of the monitors, their monitoring reports were translated into English. For other partners, their reports were published in the national language. While not a requirement, and not a critical issue given the likely main audience of the reports would be stakeholders from the national country, given the multi-country aspect of the IP EU project, funding to translate the reports into English may have supported knowledge sharing between countries - including on what makes a good monitoring report.