Land and Corruption in Africa II (LCAII) Project
Mid-Term Evaluation 2023 - Management Response

Introduction

This management response details Transparency International Secretariat's (TI-S) response to the findings and recommendations of the mid-term evaluation of the Land and Corruption in Africa II (LCAII) project (2021-2025), as well as plans for follow up. LCAII, funded by the German Federal Ministry for Economic Cooperation and Development (BMZ) and implemented by TI-S and National Chapters in Cameroon, Ghana, Kenya, Madagascar, South Africa, Uganda, Zambia, and Zimbabwe, seeks to address land corruption risks across the region.

TI-S contracted the independent evaluation firm Blomeyer & Sanz on 9 August 2023 to conduct an external mid-term evaluation of the project throughout the months August to December 2023. The intention of this evaluation was to assess the relevance, coherence, efficiency, effectiveness, and sustainability of the project at the midpoint of implementation with an aim towards adjusting our approach in the second half of the project based on the findings.

Overall, TI-S was encouraged by the findings of the evaluation. LCAII was positively assessed in terms of relevance and coherence and found to be well aligned with the broader strategy of the TI Movement (particularly with the objective on protecting the public's resources). Corruption in the land sector has been consistently identified as a key strategic focus for Chapters across the Africa region, where the project is currently implemented, and we welcome confirmation of the topic's continued relevance. LCAII was found to be fully coherent with other relevant initiatives in land governance, with TI adding substantial value with our niche focus on land corruption. We understand the importance of continued work on this area given TI's singular role, and recognise the strong need for local, regional, and global partnerships on land issues, an area that was also positively assessed by the review.

In terms of effectiveness, the evaluation recognised substantial evidence of outcomes, while acknowledging that at this midpoint some outcomes are yet to materialise. The report found initially positive project results including enhanced awareness and strengthened confidence to seek justice among affected communities as well as increased understanding of the broader trends in land corruption due to regional research on the topic. This research provides an important evidence base for project implementers to move ahead with calls for reform in the latter half of the project.

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Response to specific evaluation recommendations

Regarding recommendations for improvement, TI-S broadly accepts all six high-level recommendations made by the mid-term evaluation (see Annex I for detailed recommendations). In response, TI-S has designed a detailed course of action. In cases where recommendations are primarily relevant for Chapters, TI-S will provide support to Chapters to address identified issues. We expect that our approach will improve the efficiency of implementation and contribute towards enhanced outcomes and sustainability in the latter half of the project (2024-2025). Specifically, TI-S will take the following actions in response to each recommendation:

Recommendation for TI-S: Support Chapters to achieve changes in policy

We fully accept this recommendation and in response, TI-S has developed a tailored support plan for Chapters to be rolled out in 2024. As part of this effort, TI-S designed and disseminated a follow-up survey in January 2024 to better understand the specific challenges faced by each Chapter to achieving policy outcomes. This approach recognises that Chapters have encountered diverse barriers to policy change and will allow us to design targeted solutions. Based on the survey results, as well as conversations with Chapters, TI-S will support select Chapters to develop analyses of legal and institutional loopholes that enable land corruption as well as relevant recommendations. This will be followed by TI-S support in updating national advocacy plans in line with the analyses and policy training as needed in the latter half of 2024. TI-S also joined Land Rights Now as a co-convenor in 2023 and this role will allow us to offer some Chapters the opportunity to roll out a campaign on land corruption with dedicated financial support and mentoring by the Land Rights Now team.

Recommendation for Chapters: Plan for supporting affected communities with resolving land issues

We partially accept this recommendation. This recommendation primarily stems from resource limitations identified by one Chapter, TI Cameroon. In this case, the Chapter noted resource limitations in terms of following up with those affected by land corruption and reached by awareness raising activities (particularly in remote areas). We suggest that based on the evidence provided in the report, the findings do not apply to all Chapters but primarily to TI Cameroon. However, we agree with the two specific recommendations put forward by the evaluation including that 1) available project resources, future projects and local partners are instrumentalised to strengthen the work of the Advocacy and Legal Advice Centers (ALACs) and develop their work in more remote areas; and that 2) Chapters should ensure that the project's limitations are clearly communicated to final beneficiaries, including ALAC clients.

While we recognise that it will not be possible to significantly increase the amount of support provided by Chapters to affected communities given the funding and staff resources available to Chapters, TI-S will engage in discussions with Chapters on how to match Chapters' ambitions with their available budgets

(both for Phase II implementation and for future projects), and to clarify and manage risks around raising community demands for accountability that cannot be followed-through by TI or our partners. One way to do this would be by improving communication with affected communities towards managing expectations about the project's limitations.

Furthermore, the project will continue to identify local partners or opportunities to improve access to reporting channels and case follow-up, especially in locations where Chapters undertake outreach activities but do not have an ongoing presence. In terms of broader learning for our approach to community work, TI-S acknowledges the importance of integrating this learning into any future planned projects that involve community case work. In such future projects, it will be important to ensure that we integrate adequate resources. Most chapters mainstream their ALAC work across multiple projects, which helps to ensure adequate capacity and continued support even when one project ends.

Recommendation for TI-S and Chapters: Plan for ensuring the sustainability of partnerships

We fully accept this recommendation, and both Chapters and TI-S will review existing and future partnerships in early 2024 with an eye towards more substantial cooperation and coordination. Where appropriate, over the course of 2024, TI-S and Chapters may formalise existing partnerships with a memorandum of understanding or structure the partnership around a more concrete and tangible collaboration or outcome. In 2025, in collaboration with Chapters, TI-S will also develop and roll out a plan for maintaining strategic partnerships beyond the project duration.

Recommendation for TI-S and Chapters: Ensure that future project activities specifically consider the role of extractive industries

We fully accept this recommendation and going forward, TI-S and Chapters will engage more systematically with relevant stakeholders with a role in the extractive industries and identify opportunities for collaboration with these stakeholders. At the global level, these stakeholders will include the Natural Resource Governance Institute and the Extractive Industries Transparency Initiative. To support relevant national-level partnerships, TI-S will work with Chapters to identify and connect with relevant stakeholders working on governance in the extractive sector. Towards this end, in 2024 TI-S will also organise exchanges and discussions on the relationship between land and the extractive sector, building on relevant research from 2023[1], and will connect LCAII Chapters with Chapters with experience working on accountability in the extractive sector, for example TI Australia.

Recommendation for TI-S: Explore potential for exchanges between Chapters

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[1] https://www.transparency.org/en/publications/addressing-land-corruption-for-climate-justice-transparency

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We fully accept this recommendation and will create opportunities in 2024 and 2025 for Chapters to engage in meaningful spaces for exchange**.** As part of the aforementioned survey, Chapters identified in-person exchange visits, more frequent project team meetings and more opportunities to participate in regional events as the key ways that they would like to actively engage with each other and with the wider Movement. In response, in 2024 TI-S will facilitate 1-2 in-person exchange meetings between Chapters, more frequent online discussions (particularly around policy learnings), and identify further opportunities for Chapters to engage regionally, within budget and project constraints. We aim that in 2024 Chapters will have the opportunity to present in at least three regional or global events.

Recommendation for TI-S: Strengthen the collection of data on outcomes

We fully accept this recommendation and will develop a centralised database on indicators and outcomes and will provide ongoing training to Chapters on MEL and data collection in early 2024. To improve continuous monitoring of both qualitative and quantitative data on project outcomes and indicators, this centralised database will be a valuable tool for taking stock and promptly responding to project challenges or progress issues. We will also adjust our formats to foster a more regular and systematic approach to outcome gathering. TI-S will ensure that consolidated data is shared back with Chapters to inform their own decision making and learning. Additionally, TI-S will also provide annual training to Chapters on data collection for indicators and MEL tools (to take place in January each year) as well as a dedicated session on identifying outcomes. Further training needs will be assessed based on feedback from the Chapters following annual data collection and reporting.

Final remarks

TI-S would like to thank BMZ for their continued support of the LCAII project and for enabling efforts to document and tackle land corruption in Sub-Saharan Africa. We are happy to discuss any questions about the findings of the report, particularly regarding further actions that we could take to improve on the identified areas of opportunity.

TI-S would also like to thank the evaluators for their diligent work on the mid-term review and for identifying clear and actionable recommendations to chart a way forward for the project.

Annex I: Mid-term evaluation of the Land and Corruption in Africa Phase II Project, Conclusion and Recommendations

Conclusion

At mid-term stage the project is characterised by its strong performance against the different evaluation criteria and strong prospects for achieving intended outcomes. The evaluation has identified a series of good practices that have supported relevance and effectiveness, and these practices should be kept in mind for the remainder of project implementation, but also for future projects. These practices include most notably the focused design of the project (target areas / populations) and flexibility in tailoring activities to different needs; involving local partners / leaders with strong networks and treating them as equal partners; and making use of channels of communication that are being used by the target audience.

Recommendations

Whilst the project has performed well, the evaluation has also identified a series of challenges / constraints and therefore addresses six recommendations to TI-S and the eight Chapters:

- **Support Chapters for achieving changes in policy**: Progress at the mid-term stage mostly relates to change of behaviour and practice, and only to a lesser extent to change in policy. To fully achieve policy-related outcomes, the remaining time of the project needs to be geared towards engaging with state actors at local and national level to advocate for the intended changes in policy. TI-S should consult with Chapters on the extent to which Chapters might require support with this. In this context, and to give additional prominence to advocacy efforts, consideration could be given to involving the donor (via GiZ offices / German embassies) in advocacy / dissemination meetings. For future projects, an earlier engagement with state actors could be considered – indeed, stakeholders suggested that working with state actors from the very beginning of the project might have instilled some sense of joint ownership of project outputs and outcomes. In this context, additional consideration could be given to the role of TI-S in terms of supporting the NCs' engagement with state actors at the outset of project activities.

- **Plan for supporting affected communities with resolving land issues**: At mid-term stage there is a perception that the project has generated high expectations amongst affected populations in terms of resolving their land issues. For example, focus group discussions with directly affected communities pointed to the need of the project's / the ALACs' reinforcement of concrete support to affected communities in resolving land issues and related advocacy, with a specific focus on remote areas.

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However, the project has limited resources to follow up with affected populations on individual cases. Limited project resources also constrain the extent of work with some of the most vulnerable groups, i.e., populations in remote areas. It is therefore recommended that available project resources / future projects / local partners are instrumentalised to strengthening the ALACs and developing their work in more remote areas. In the context of the present project, it is also important for NCs to ensure that final beneficiaries understand the project's limitations (expectation management).

- **Ensure that future project activities specifically consider the role of extractive industries**: The evaluation found extractive industries to have an important role in the area of land corruption. The importance of addressing the role of extractive industries is underlined by the recent discovery of natural resources and / or increasing industrialisation. In this context, there might be benefit in further strengthening the project's engagement with organisations working on governance in the extractive industry sector, e.g., the Natural Resource Governance Institute (this organisation has a specific country focus on Ghana and Uganda, but also covers Sub-Saharan Africa at a regional level).

- **Plan for ensuring the sustainability of partnerships**: TI-S and the Chapters have invested substantial efforts in cooperation and coordination with other relevant actors at global / regional and local level. However, some stakeholders suggested room for further strengthening this engagement by establishing arrangements for systematic exchanges. In this context, TI-S and the Chapters could review the extent to which existing partnerships might require some form of additional institutionalisation (e.g., memorandum of understanding). In the same context it is suggested that the Chapters maintain their contacts with local partners involved in research activities, most notably to inform them about future project activities.

- **Explore potential for exchanges between Chapters:** At mid-term stage, Chapters have only had limited contact between each other. There is a perception among some Chapters that there is not much common ground to engage in meaningful exchange. The eight countries covered by the project have different legal traditions; however, there are also common issues, e.g., determining how modern laws speak to customary laws and practices. Some Chapters have engaged with each other, and it is recommended that TI reviews the potential for stronger engagement between Chapters (asking Chapters about the thematic / methodological areas where they would like to have exchanges; considering a platform for such exchanges, e.g., a moderated blog).

- **Strengthen the collection of data on outcomes**: The assessment of outcomes at mid-term stage draws on both project reporting on indicators and qualitative feedback by stakeholders. However, project reporting on indicators / outcomes is mostly organised around the annual reports to the donor. There is no continuous / ongoing stock-taking of data on indicators (e.g., in the form of a database or spreadsheet), and the Chapters' Quarterly Reports do not systematically report on outcomes or include 'Human interest stories' (meant to reflect on 'achievements, challenges, innovations'). TI-S should review with the Chapters the feasibility of systematically collecting data on outcomes, including in the Quarterly Reports.

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Finally, there might be benefit in organising a dedicated meeting on indicators and 'human interest stories' for TI-S and Chapters to share practices with regard to data collection and 'human interest stories' and to ensure that expectations for providing data for future (and especially the final) reports to donors are clear. This meeting could involve a capacity development component.