Evaluation report:

Mid-term evaluation of the Land and Corruption in Africa Phase II Project (2021-2025)

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List of abbreviations

ALAC  Transparency International Advocacy and Legal Advice Centre
CPI   Corruption Perception Index
CSO   Civil Society Organisation
ERT   Equal Rights Trust
GiZ   Deutsche Gesellschaft für Internationale Zusammenarbeit (German agency for international cooperation)
ILC   International Land Coalition
LCA II Land and Corruption in Africa Phase II
NC    Transparency International National Chapter
OECD-DAC Organisation for Economic Cooperation and Development, Development Assistance Committee
TI-S  Transparency International Secretariat
ToC   Theory of Change
ToR   Terms of Reference
UN    United Nations
WWF   World Wide Fund for Nature

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Executive summary

This summary briefly presents the main findings, conclusions and recommendations.

I. The Transparency International Secretariat (TI-S) contracted the independent evaluation firm Blomeyer & Sanz on 9 August 2023 to conduct the mid-term evaluation of the project “Land and Corruption in Africa Phase II Project (2021-2025)” (referred to in this report as the ‘project’) throughout the months August to December 2023.

II. A mostly qualitative question-based evaluation approach was adopted, focusing on the evaluation criteria of the Organisation for Economic Cooperation and Development, Development Assistance Committee (OECD-DAC), namely, relevance and coherence, effectiveness, efficiency, and sustainability. Data collection involved desk research, semi-structured remote interviews (35 interviews), and field missions to Cameroon (7 interviews, 2 focus group meetings), Ghana (12 interviews, 3 focus group meetings) and Madagascar (10 interviews, 1 focus group meeting) (see Annex 2).

Findings

Relevance

III. Overall, the LCA-II project’s relevance can be very positively assessed. The project is well-aligned with TI’s Strategic Plan 2023-2026 through directly addressing the objective of “Protect the Public’s Resources.” The project is also relevant to CSO work on land issues, but its alignment with strategy elements speaking to government and business could be improved. At the mid-term stage, the project has clearly responded to the needs of those impacted by land corruption, most notably in terms of raising awareness on land rights and enhancing understanding of pathways to resolving land corruption issues, with the project’s research component generating particularly useful insights on this aspect. Moreover, issues such as population growth and the discovery of natural resources in the target countries make land pressure and corruption relevant issues. Factors that benefitted relevance included the project’s targeted design both in terms of location and beneficiary, and consultations with multiple stakeholders when designing activities.

Coherence

IV. The project is fully coherent with other relevant initiatives in the area of land governance. Working specifically on land corruption, TI has identified a ‘niche’ where it adds substantial value. The project has invested substantial efforts in cooperation with other relevant actors, including by establishing partnerships with local
organisations working on land issues. NCs are perceived by local partners to add value by being able to engage in national-level advocacy work (including via media), whilst local organisations can engage with local communities and local-level state actors. Coordination arrangements within TI-S are well established, while at mid-term stage, NCs have only had limited contact between each other. In some countries, coherence between relevant initiatives would benefit from a more structured approach.

Effectiveness

V. **At mid-term stage, the project has been implemented effectively, however, and as expected for a project at mid-term stage, intended outcomes have yet to fully materialise.** During this period, the project has mostly focused on research activities, generating evidence and on awareness raising, and capacity development, with a comparatively more limited focus on regular engagement with state actors and the private sector.

VI. Despite implementation being only at mid-term stage, there is already substantial evidence of outcomes pertaining to change in behaviour, in practice, and in policy. Local communities exposed to the work of the project have developed renewed hope in seeing their land issues resolved in the future, while enhanced awareness and strengthened confidence has already led affected populations to demand justice. The project has led to enhanced understanding of how land corruption specifically affects disadvantaged groups, thanks to systematic research led by the Equal Rights Trust in the eight countries. Meanwhile, coordination with other organisations focusing on land issues has brought prominence to the issue of corruption among land experts.

VII. Factors conducive to effectiveness include TI’s equitable relationships with partners and involvement of leaders of local communities where the project is being carried out. However, the sheer scale and complexity of corruption, challenges in engaging with state actors, and limited NC resources have emerged as key constraints to effectiveness.

Efficiency

VIII. **The project’s efficiency can also be given a good overall assessment, albeit with opportunities for improvement.** Interviews with the NCs failed to identify any instances of ‘unreasonable’ project costs. Project management at the level of TI-S and the NCs is effective, as evidenced by progress with the delivery of outputs and outcomes at mid-term stage. Moreover, NCs commented positively on TI-S project management. In general terms, NCs noted resource constraints, specifically those affecting the scope of advocacy activities, and the access to communities in more remote areas. NCs also suggested that, ideally, project funds should be disbursed in a more timely manner to NCs.

IX. In terms of opportunities for improved efficiency across the project, there might be scope for developing mutual support between NCs. At the mid-term stage, there has
only been limited direct contact between NCs, though in some cases, contacts have implied important learning. Additionally, NCs might benefit from additional support on reporting and monitoring.

Sustainability

X. **In terms of sustainability, it is too early at mid-term stage to comment with confidence on the significance and durability of change in practice and policy.** Currently, there is substantial evidence of changes in behaviour, but more limited evidence of changes in practices and very limited evidence of changes in policy, which is to be expected at mid-term stage. Changes in behaviour have a strong likelihood of being durable, but this requires a continuation of awareness raising activities, and most importantly, access to practical support for affected communities to resolve land issues.

XI. Despite it still being early in the implementation period, there is initial feedback of the project having triggered the development of other relevant initiatives. Early evidence also exists of duty bears committing to project solutions, while positive relations between NCs and their local partners increase the likelihood of future cooperation.

XII. Factors conducive to sustainability include the utilisation of local resources and relations to ensure continuity. Moreover, sustainability is built into the project’s design through its focused nature. However, the project also faces notable challenges to sustainability, including constraints on providing support and limited funds beyond the project period.

Conclusions and recommendations

XIII. At mid-term stage the project is characterised by its strong performance against the different evaluation criteria and strong prospects for achieving intended outcomes. Whilst the project has performed well, the evaluation has also identified a series of challenges / constraints and therefore addresses five recommendations to TI-S and the eight NCs:

➢ Support NCs for achieving changes in policy.

➢ Plan for supporting affected communities with resolving land issues.

➢ Ensure that future project activities specifically consider the role of extractive industries.

➢ Plan for ensuring the sustainability of partnerships.

➢ Explore potential for exchanges between NCs.

➢ Strengthen the collection of data on outcomes.
1. Introduction

1. This section introduces the evaluation report for the mid-term evaluation of the project “Land and Corruption in Africa Phase II Project (2021-2025)” (referred to in this report as the ‘project’). The section briefly comments on the evaluation scope and objectives (Section 1.1); the methodology, including constraints experienced in the course of the evaluation (1.2); and the structure of this report (1.3).

1.1. Evaluation scope and objectives

2. The Transparency International Secretariat (TI-S) contracted the independent evaluation firm Blomeyer & Sanz on 9 August 2023 to conduct this external mid-term evaluation throughout the months August to December 2023.

3. Implemented since December 2021 in Cameroon, Ghana, Kenya, Madagascar, South Africa, Uganda, Zambia, and Zimbabwe, and with financial support from the German Federal Ministry for Economic Cooperation and Development (total budget of EUR 3.5 million), ‘the ultimate objective of this project is to ensure that corruption practices in land administration and land deals are addressed, contributing to improved livelihoods of men and women in Africa’ (bold font by the evaluator). Note that the project built on an earlier project with the same title implemented between 2015 and 2019 (referred to in this report as the ‘first phase’ of the project).

4. The Terms of Reference (ToR) present the objectives of the evaluation as follows:

   ➢ Provide an objective assessment of progress towards achievement of the outcomes and outputs as specified in the MEL framework, including progress towards the

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1 Transparency International (2022) Proposal to the German Federal Ministry for Economic Cooperation and Development (BMZ) LAND & CORRUPTION IN AFRICA Phase II (dated September 2021).
achievement of advocacy goals and document good practices, lessons learnt and challenges

➢ Assess the utility of MEL practices and data collection under the MEL Framework and identify opportunities to improve the project’s approach to MEL, whether through training or adjustments to instruments or planned monitoring activities

➢ Based on the learning so far, assess whether the project’s underlying assumptions, strategy and theory of change should be amended to increase our chances of achieving intended results

➢ Provide evidence-based and actionable recommendations that aim at strengthening the project in the second half of its implementation, improving management of the project, and increasing the chances of achieving the programme’s objectives and results.

5. Considering these evaluation objectives, the evaluation is both ‘summative’ and ‘formative’:

➢ Summative evaluation: The summative view aims to assess the performance of the project by reviewing outcomes against expectations. The focus is on understanding what has been achieved and why (facilitating factors / constraints).

➢ Formative evaluation: The formative perspective aims to enhance performance with a view to the future, most notably the delivery of activities until the end of the project in 2025. Here, the focus is on developing pragmatic recommendations to help the stakeholders – TI-S and National Chapters (NCs) - to improve the design and implementation of future activities.

1.2. Methodology

6. The ToR for this evaluation presents details on the methodology, a mostly qualitative question-based evaluation, focusing on the evaluation criteria of the Organisation for Economic Cooperation and Development Assistance Committee (OECD-DAC), namely, relevance and coherence, effectiveness, efficiency, and sustainability. Section 2.6.1 presents the theory of change that guided the evaluation, and Annex 1 notes the corresponding overarching evaluation questions. Data collection involved desk research, semi-structured remote interviews (35 interviews), and field missions to Cameroon (7 interviews, 2 focus group meetings), Ghana (12 interviews, 3 focus group meetings) and Madagascar (10 interviews, 1 focus group meeting) (see Annex 2). Interviews and focus group meetings involved project partners and local communities in Cameroon, Ghana, Kenya, Madagascar, South Africa, Uganda, Zambia,

and Zimbabwe; a series of regional / global stakeholders and TI staff in the Transparency International National Chapters (NC) and TI-S.

7. The evaluation experienced a few challenges. Data collection in the form of remote interviews was constrained by the large majority of interviewees having limited availability (interviewees did not connect to calls despite having confirmed the interview or did not respond to requests for interviews) and / or experiencing technical issues (poor internet connection). This was mitigated by sending multiple reminders / flexibly re-scheduling interviews, but this implied allocating substantial additional resources to data collection, with interviews conducted throughout September and October 2023. Moreover, data collection in one of the case study countries was constrained by political unrest, so this had to be mitigated by reducing the extent of in-country travel for data collection. With regard to future evaluations, the experience with the remote interview programme suggests strengthening the case study approach as far as possible (conducting missions to selected countries).

8. This report integrates feedback from a validation meeting with NCs and TI-S (20 November 2023) and also addresses TI comments on a draft version of the report.³

### 1.3. Report structure

9. The evaluation report is organised in three main sections, namely:

- this Introduction (section 0), including detail on the evaluation scope and objectives, methodology and report structure.
- the Findings (section 2), presenting findings per evaluation criterion, i.e., relevance, coherence, effectiveness, efficiency, impact, and sustainability.
- the Conclusions, Lessons Learnt and Recommendations (section 3).
- Finally, Annex 1 includes the evaluation matrix; Annex 2 lists the stakeholder consultations; Annex 3 presents an assessment of the project indicators; and Annex 4 presents insights from the three case study visits.

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³ The draft version of this report was submitted on 9 November 2023; TI comments were received on 24 November 2023.
2. Findings

10. This section presents the main evaluation findings. The presentation of findings is organised by evaluation criterion (as defined by the OECD), i.e.:

- **Relevance**: ‘The extent to which the intervention objectives and design respond to beneficiaries, global, country, and partner/institution needs, policies, and priorities, and continue to do so if circumstances change’ (2.4)
- **Coherence**: ‘The compatibility of the intervention with other interventions in a country, sector or institution’ (0)
- **Effectiveness**: ‘The extent to which the intervention achieved, or is expected to achieve, its objectives, and its results, including any differential results across groups’ (2.6)
- **Efficiency**: ‘The extent to which the intervention delivers, or is likely to deliver, results in an economic and timely way’ (2.7)
- **Sustainability**: ‘The extent to which the net benefits of the intervention continue or are likely to continue’. (2.8)

11. Findings under the different evaluation criteria that are of relevance to the section on lessons learnt and recommendations (Sections 3.1 and 3.2) are shown in underlined font.

### 2.4. Relevance

2.4.1. To what extent is the programme aligned with and contributing to the global TI Strategy 2030: Holding Power to Account and the TI-S Strategic Plan 2023-2026, including mainstreaming our commitments and principles?

12. **The project is well aligned with TI’s Strategic Plan 2023-2026.** Whilst the project pre-dates the current strategic plan (the project formally started in December 2021), a review of the strategy’s ‘Framework of Change’ indicates strong alignment with the project’s activities, outputs and outcomes. Table 1 below shows the main ‘building blocks’ of the strategy’s framework of change (namely, ‘Values & awareness’, ‘Freedoms and institutions’, related ‘Actions’, ‘Goals’, ‘Aim’ and ‘Vision’) and provides

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an indication of the extent to which the project relates to the strategy at mid-term stage. This shows strong alignment, most notably in the work of the project with civil society, but somewhat weaker alignment (at mid-term stage) with strategy elements speaking to governments and business. Similarly, looking at the strategy’s ‘Strategic Objectives’, the project speaks very directly to the objective of ‘Protect the Public’s Resources’, and this objective’s specific interest in land. However, the project also speaks to several of the strategy’s other objectives (though in some cases in a more indirect way, and to a lesser extent at mid-term stage), e.g., ‘Secure Integrity in Politics’, ‘Expand Integrity in Business’, ‘Pursue Enforcement and Justice’, ‘Build Future Leadership for Change’.
Table 1 – Alignment between TI Strategic Plan and the project (alignment indicated by the number of ✓)

<table>
<thead>
<tr>
<th>Civil society</th>
<th>Government</th>
<th>Business</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strategy: Values &amp; Awareness</strong></td>
<td><strong>Strategy: Freedoms &amp; Institutions</strong></td>
<td><strong>Strategy: Actions</strong></td>
</tr>
<tr>
<td>Social awareness of corruption impacts &amp; solutions</td>
<td>People free &amp; protected to speak up &amp; organise</td>
<td>Strong social mobilization &amp; cross border communication</td>
</tr>
<tr>
<td>Understanding of checks &amp; balances / division of power for good governance</td>
<td>Diverse independent journalism</td>
<td>Social oversight</td>
</tr>
<tr>
<td><strong>Strategy: Goals</strong></td>
<td></td>
<td><strong>Strategy: Aim &amp; Vision</strong></td>
</tr>
<tr>
<td><strong>Strategy: Values &amp; Awareness</strong></td>
<td></td>
<td>Power held to account for the common good / A world free of corruption</td>
</tr>
<tr>
<td>Political pressure, capacity &amp; willingness to act</td>
<td>Public access to information</td>
<td>Enforcement</td>
</tr>
<tr>
<td>Understanding of common good as purpose / condition of power</td>
<td>Tools and systems for equitable, inclusive community participation</td>
<td></td>
</tr>
<tr>
<td>Business commitment to responsible &amp; accountable conduct</td>
<td>New and better standards governing access, influence and exercise of power</td>
<td>Empowered, independent enforcement agencies operating fairly &amp; without fear or favour</td>
</tr>
<tr>
<td>National integrity &amp; regulatory systems addressing all key corruption risks &amp; concentrations of power</td>
<td></td>
<td>Check &amp; Balances</td>
</tr>
<tr>
<td>Strong cross border regulation, implementation &amp; enforcement</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
2.4.2. Are the activities and outputs of the programme consistent with the set goal, long term objectives, and outcomes of the programme?

13. **At mid-term stage, project activities and outputs are fully consistent with the project’s wider objectives / intended outcomes.** The project’s Theory of Change as discussed in the concept note for this evaluation and briefly presented in section 2.6.1 was discussed with stakeholders, largely confirming the adequacy of activities and outputs in view of achieving outcomes (change of behaviour, practice and policy). As discussed in section 2.6.2 on progress with achieving outcomes, 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 to advocate for the intended changes in policy.

2.4.3. Does the project respond to the needs of those impacted by land corruption?

14. **At mid-term stage, the project has clearly responded to the needs of those impacted by land corruption, most notably in terms of raising awareness on land rights and enhancing understanding of pathways to resolving land corruption issues.** The NCs and local partners consistently identified land corruption as one of the main corruption issues, thus underlining the relevance of the project. Whilst fully confirming the overall relevance of project activities, focus group discussions with directly affected communities pointed to areas where additional (future) support might be required, namely reinforcing the provision of concrete support to affected communities in resolving land issues and related advocacy, with a specific focus on remote areas. Indeed, having developed awareness of their rights, affected communities now intend to take action to resolve land issues, but require external (mostly legal) support with this.

15. Looking specifically at needs in the areas of awareness raising and enhancing understanding, the project’s research activity (e.g. on the intersection between land corruption and discrimination) has been particularly relevant in terms of generating insights on:

- **Underlying causes of land corruption:** who are the actors involved in land corruption, with much of the feedback pointing to the role of industry, specifically extractive industry, and large-scale investments, both by public and private sector actors, e.g., the Kribi Deep Seaport project in Cameroon.

- **Value of land:** (customary) landowners lack awareness of the value of their land and are easily ‘tricked’ into selling land at a price well below the actual value of the land.
➢ **Records of land ownership**: land ownership is not recorded, e.g., because land ownership dates back to colonial times or because, traditionally, ownership is not recorded, constraining land transactions.

➢ **Role of traditional leaders**: In some countries traditional leaders / chiefs are involved in land transactions, and there is limited record keeping of these transactions, which can lead to subsequent disputes, especially when leadership changes, knowledge often leaves with the departing leader, and there is a lack of information transfer; moreover, there is limited transparency regarding decision making by traditional leaders.

➢ **Administrative / legal procedures**: people intending to acquire land or register / ‘legalise’ existing ownership ignore legal and administrative requirements or avenues to resolve ownership issues, cannot easily access relevant information, and /or face corrupt authorities, and are tricked into paying undue fees / bribes. This particularly affects the most vulnerable populations who lack information on the right services and procedures to take and financial resources to meet corrupt demands or pay lawyers. In this context, state actors pointed to the need for reforming legislation to address land corruption.

➢ **Challenges for women (and other vulnerable populations) accessing land**: women lack confidence to engage in land transactions and often only male relatives are mentioned in legal documents / land transactions. This is exacerbated in the cases of single women / mothers and widows.

➢ **Need for more transparency on private and public sector investments in land development**: developers fail to provide information to local communities, and therefore the affected communities are not in a position to challenge decisions. In Madagascar, there is also a need for more transparent and accessible land-related data (this is exacerbated by the fact that there is no law on access to information).

➢ **Nexus between land corruption and environmental issues**: Working in selected pilot areas has brought to light the implications of land corruption in terms of environmental degradation (mostly related to large-scale infrastructure and extractive industries). Note that environmental degradation directly relates to local communities’ livelihoods as they can be deprived of access to food (fishing, hunting, agriculture) and economic activities (wildlife tourism). Moreover, local communities noted cultural and spiritual values associated with the land.

16. **The most vulnerable populations are most affected by land corruption**, e.g., they lack knowledge and resources to challenge decisions affecting them, more so than less vulnerable populations. In some cases, the most vulnerable communities engage in activities requiring access to land that are not recognised by the law, e.g., land use for hunting and fishing by Pygmy people in Cameroon.
Indeed, in Cameroon, the legal system frequently neglects the Pygmy people’s use of land for hunting and fishing. Existing regulations explicitly prohibit obtaining land titles for these activities, reserving such titles exclusively for agricultural or construction purposes. This poses a challenge for the Pygmy people, whose primary engagements revolve around hunting and fishing. In general terms, rural communities and specifically women farmers and migrant farmers are more affected, as they have less access to information.

17. The relevance of dealing with land corruption issues is further underlined by population growth and related land pressure in some countries (noted mostly for Uganda and Zimbabwe). Moreover, the recent discovery of natural resources and / or increasing industrialisation is expected to exacerbate land corruption (noted mostly for Uganda and Cameroon).

18. Turning to the factors explaining relevance, relevance benefited from the focused design of the project, most notably the focus on selected areas, e.g., in Kenya, Kwale (coastal region) and Nairobi, the capital; in Cameroon, Kribi, etc. At the same time, and in consideration of the substantial scale of needs, a more targeted focus, e.g., on only one pilot area per country would have also worked. The project has another focus in terms of primary target groups, such as women and indigenous communities. Relevance also benefited from the consultations for the design of the second phase integrating feedback by the NCs; the latter commended the project design for providing flexibility in allowing the tailoring of activities to the needs of the different countries / priorities of NCs.

19. Some NCs suggested the project would have benefited from providing more detailed guidance on how to engage with state actors from the very start of the project. The strategy for engaging with state actors was left to the different NCs to decide on based on their different experiences / needs / context.
2.5. Coherence

2.5.1. How coherent/complementary is the programme with other major civic-led initiatives being undertaken in the area of land governance at global, regional and national levels? How well have TI-S and TI chapters used partnerships to strengthen the effectiveness of the project and to avoid duplication?

20. **The project is fully coherent / complementary with other relevant initiatives in the area of land governance.** Working specifically on land corruption, TI has identified a ‘niche’ where it adds substantial value. Indeed, stakeholders were familiar with other initiatives focusing on land or corruption issues but were unable to identify any other organisation specifically focusing on land corruption.

21. The project has invested substantial efforts in cooperation / coordination with other relevant actors / initiatives. This has strong potential for ensuring the integration of land corruption issues in the work of other organisations and / or dissemination of project outcomes. Examples of cooperation / coordination include, inter alia:

- Coordination with the Worldwide Fund for Nature (WWF) on linkages between land corruption and environmental corruption and conflict: In this context WWF referred to a global coalition around the theme of environmental corruption, comprising some 500 members. This coalition has established a series of working groups, including one on land corruption led by the project’s manager, which has allowed for the dissemination of project outcomes and related advocacy at a global level.

- Cooperation with the Equal Rights Trust (ERT) on the intersection between land corruption and inequality, with the ERT supporting the project with research on how disadvantaged groups (women, elderly people, disabled people, LGBT etc.) are particularly affected by land corruption.

- Coordination with the International Land Coalition (ILC) provides access to a very large network (270 members in 75 countries), including at the level of the United Nations (UN), given that the ILC is hosted by one of the UN agencies, namely the International Fund for Agricultural Development. Interestingly, the ILC had no specific focus on corruption issues prior to engaging with the project.

- The project’s coordination with the Land Portal implies access to the Land Portal’s channels of communication (web portal on land governance data) and potential for the project to use this for dissemination purposes. The Land Portal noted the informal nature of cooperation with TI, which suggests interest in ‘formalising’ cooperation.
Whilst TI-S has systematically explored possible channels of coordination / dissemination, there might be room for engaging with additional organisations who have an interest in specific aspects relating to land issues. Several stakeholders noted concerns over extractive industries engaging in corrupt land (grabbing) practices and suggested **engaging with organisations working on governance in the extractive industry sector**, e.g., the Natural Resource Governance Institute.

Similar to TI-S, the NCs have been **systematic in terms of engaging with other local organisations with an interest in land issues** and have established partnerships with other organisations working on land issues. Indeed, NCs demonstrated very good awareness of relevant projects implemented by other organisations. Looking at specific examples of coordination / cooperation, the NC in South Africa engaged with the ‘Built Environment Support Group’ and established a Memorandum of Understanding for their cooperation. Similarly, the NC partnered with the ‘Surplus People Project’, a civil society organisation (CSO) with a 40-year track record of working on land rights. In Madagascar, the NC has been partnering with SIF, which is an umbrella organisation for CSOs working in the land sector. These partnerships allowed the project to draw on other organisations’ networks, thereby facilitating work with affected communities. In Madagascar, there is close cooperation with the German agency for international cooperation (GiZ) in Madagascar. In Cameroon, the NC was in touch with GiZ, WWF and the European Union on related projects, and in Ghana there was close collaboration with state actors such as the Lands Commission. Collaboration with other local organisations allowed access to existing local networks and gave additional visibility to the project. There has been **no overlap with other relevant initiatives**. Stakeholders confirmed the absence of other initiatives specifically focusing on the nexus between land issues and corruption.

**Local partners commended NCs for engaging them**, e.g., in research activities, and now suggest maintaining regular communication on subsequent stages of project implementation. **NCs are perceived by local partners to add value by being able to engage in national-level advocacy work** (including via media), whilst local organisations can engage with local communities and local-level state actors.

In some countries (e.g., Ghana and Madagascar), **cooperation / coordination between relevant initiatives would benefit from a more structured approach**, as existing arrangements were not systematic, and were instead dependent on the initiative of individual project managers. There might be benefit in establishing ‘memoranda of understanding’ or similar arrangements to ‘institutionalise’ cooperation between NCs and local partners.
22. **Coordination arrangements within TI-S are well established.** This includes coordination with TI-S ‘Teams’ working on specific thematic issues (e.g., climate change, public resources) as well as Teams with a geographical remit (e.g., different areas of Africa). There are also groups of TI staff convening around related projects, including a group of six projects focusing on Africa. Engagement with the project has contributed to learning in the different teams, i.e., better understanding of different dimensions of land corruption and interfaces with other themes. Coordination within TI-S is ensured via the allocation of funding for TI staff outside the project team to dedicate time to the project.

23. **At mid-term stage, NCs have only had limited contact between each other.** There is a perception among some NCs that there is not much common ground to engage in meaningful exchange. The eight countries covered by the project have different legal traditions (e.g., countries with Commonwealth legal traditions compared to countries with French legal traditions); however, there are also common issues, e.g., determining how modern laws speak to customary laws and practices. Some NCs have engaged with each other; for example, the NC in Zambia has directly contacted NCs in Kenya and Uganda for advice.

### 2.6. Effectiveness

#### 2.6.1. Introducing the assessment of effectiveness

24. This section starts with a brief recapitulation of the theory of change (ToC) of the project – discussed in more detail in the concept note for this evaluation. The ToC draws on the project’s *Initial approved project proposal* and *MEL Framework.*

25. The project proposal (with confirmation by the MEL framework) presents the overall objective as follows: *The ultimate objective of this project is to ensure that corruption practices in land administration and land deals are addressed, contributing to improved livelihoods of men and women in Africa* (bold font by the evaluator). This statement can be read as comprising two distinct levels of objectives:

- first, relevant stakeholders (both duty bearers and right holders) address corruption in land administration and land deals (specific objective),

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5 Transparency International (2022) Proposal to the German Federal Ministry for Economic Cooperation and Development (BMZ) LAND & CORRUPTION IN AFRICA Phase II (dated September 2021).

and once this is happening, right holders enjoy improved livelihoods (overall or wider objective).

26. Turning now to the project’s three main outcomes, the first one – change in behaviour - is to create networks of women, men and youth in Africa who are better equipped to play a social oversight role in the land sector. In order to achieve this, citizens need to better understand the nature of land corruption, their rights, and the mechanisms, safeguards and reporting channels at their disposal. They should organize and mobilize to demand greater transparency and have access to greater support and legal assistance from Advocacy and Legal Advice Centres (ALAC). This would be made possible by a series of training sessions and workshops to the different stakeholders involved in the process, and through a wider coverage of the topic both in the media and in educational centres to raise awareness.

27. The second outcome - change in practice - concerns CSOs and private sector actors and expects them to behave responsibly and to promote context-specific solutions for land corruption. In order to carry this out, it is important that CSO alliances are formed so these organisations can benefit from a greater pool of resources, and that networks are built including private sector stakeholders. For this to happen, spaces for constructive dialogue need to be built to bridge the gap between these two sectors, and communities of practice need to be established to share knowledge.

28. Finally, the third objective – change in policy - concerns authorities, who are expected to reform or adopt anti-corruption laws, policies, and measures to prevent and redress corruption in the land sector. To achieve this, the project will engage with local and national governments with the evidence extracted from the detailed analysis of the existing legal framework and its gaps, and through regional and national-level research initiatives. Similarly, the subject will be brought to the attention of intergovernmental agencies and institutions through global advocacy campaigns.

29. **Error! Reference source not found.** shows the ToC.

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7 Note that our initial stakeholder mapping suggests strong levels of engagement with civil society and state actors, but limited involvement of private sector actors.
2.6.2. **What progress has been made so far against the envisioned outcomes and outputs?** To what extent is the project on track? What main factors have played a role in the achievement or non-achievement of the outcomes and outputs? How could the effectiveness of the programme be improved?

30. **At mid-term stage, the project has made good progress with delivering outputs, however, and as expected for a project at mid-term stage, intended outcomes have yet to fully materialise.** Progress in achieving outcomes is somewhat constrained by the intangible nature of some of the outcomes and related difficulties in measuring outcomes in quantitative terms. Moreover, there are constraints in relating first outcomes exclusively to the project. Indeed, to some extent, stakeholders referred to the first phase of the project (2015-2019) when explaining outcomes.

31. The assessment of outcomes in this section draws on both project reporting on indicators and qualitative feedback by stakeholders (remote interviews / field missions to Cameroon, Ghana and Madagascar). **Note that 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.,

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in the form of a database or spreadsheet), and the NCs’ Quarterly Reports do not systematically report on outcomes or include ‘Human interest stories’ (meant to reflect on ‘achievements, challenges, innovations’). This approach to reporting on indicators / human interest stories is mostly explained by NC resource constraints in terms of collecting data on indicators, and the fact that implementation is at mid-term stage (i.e., human interest stories will only emerge at a later stage). Please see Annex 3 for our assessment of the project indicators. The project’s approach to monitoring is considered adequate. A more continuous / ongoing collection / reporting of data, e.g., at quarterly level, might make it easier for the project to share data on progress in ‘real time’ with external stakeholders (donor, external evaluator), however, this is not to say that the project management would require this. Indeed, the current approach with the NC Quarterly Reports and quarterly check-in meetings with all NCs should provide sufficient data to ensure the identification of any implementation issues. Finally, there might be benefit in organising a dedicated meeting on indicators and ‘human interest stories’ for TI-S and the NCs 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 as the majority of NCs were in favour of additional support on data collection.9

32. On the whole, in its first two years of implementation the project has mostly focused on research activities / generating evidence and on awareness raising / capacity development. During this time, there has been a comparatively more limited focus on systematic / regular engagement with state actors and the private sector, and related advocacy work in the eight countries. There are different experiences in terms of engaging with state actors, e.g., in some countries the engagement with state actors benefits from existing relations (Ghana, Cameroon); however, in other countries engaging with state actors is more challenging (Kenya, Madagascar, South Africa, Zimbabwe). Note that in their Quarterly Reports only one NC refers to challenges with advocacy, namely Zambia (flagged as ‘Amber’ in quarters 3 and 4 in 2022 and in quarters 1 and 2 in 2023). Challenges in engaging state actors are explained with the latter being implicated in and/or permissive of corrupt practices. The NCs’ advocacy efforts are also constrained by the NCs’ resource limitations. Some of the NCs’ local partners suggested that an earlier and more continuous engagement with state actors would have been preferable, noting that this might have instilled some sense of joint ownership of project outputs and outcomes. Considering the challenges in engaging state actors, some stakeholders suggested for TI-S to take a more prominent role / provide additional support in this form of engagement at least at the outset, with NCs then following up (for

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9 Poll conducted in the context of the validation meeting for this evaluation, involving TI-S and six NCs, 20 November 2023.
example, the NC in Madagascar mentioned that even an official letter/request coming from TI-S would be useful for them, as they understand that for TI-S engaging personally in each country might be difficult).

33. Despite implementation being only at mid-term stage, there is already **substantial evidence of outcomes.** Data collection pointed to the following categories of outcomes, organised in line with the ToC around change in behaviour, practice and policy:

*Change in behaviour*

➢ **New hope in being able to resolve land issues in the future** – local communities exposed to the work of the project now have developed renewed hope in seeing their land issues resolved in the future. Whilst this is an intangible outcome, therefore difficult to capture in quantitative terms, it is of key importance. Indeed, local partners explained that the project had rekindled hope, and that this explained the willingness of affected populations to engage in capacity development and to demand justice.

➢ **Enhanced awareness and therefore strengthened confidence** has already led affected populations to demand justice. For example, in South Africa, after participating in a capacity development activity, participants registered a first public complaint with the ’Public Protector South Africa’ (with similar feedback for the other countries). Another such example relates to Cameroon, where local communities’ exposure of corrupt practices led to state authorities cancelling 121 land titles obtained on the basis of corrupt practices. In Ghana a person grappling with land-related problems sought help from the project upon learning about its activities through a radio programme, showcasing the project’s positive influence in addressing public issues. An increased number of reports and complaints concerning corruption and violation of land rights were also reported for the other countries. There is also evidence of affected land owners having increased confidence to go public with their cases in national/local media outlets. Finally, it is important to note that stakeholders were not in a position to relate enhanced awareness / strengthened confidence exclusively to the project, and that credit was also given to the first phase of the project (2015-2019).

➢ **Enhanced understanding of procedures regarding land issues** is indicated by feedback on project participants / target audiences now turning to relevant authorities to resolve land issues. Before the project, stakeholders lacked knowledge of available pathways to resolve land issues. Now beneficiaries are approaching NCs and ALACs to follow up on land issues (e.g., to learn more about land corruption issues via project-sponsored radio campaigns).
Change in practice

➢ **Local partners integrating the theme of land corruption in their work:** Some of the NCs’ local partners did not work on land corruption before engaging with the project, however, now they are integrating land corruption in their work programmes, e.g., Oxfam Uganda; this also includes local media who are reporting more frequently on land corruption issues (e.g., Madagascar).

➢ **Local partners providing enhanced support services:** cooperating with the project has inspired some of the NCs’ local partner organisations to enhance their support for local communities (South Africa).

➢ **Enhanced organisation of local actors and increased awareness of the need to speak with a common voice:** The project acted as a platform for convening local CSOs, and community organisations have developed a sense that working in alliances (e.g., for advocacy work) renders them less vulnerable vis-à-vis state actors. In the context of research on land corruption in Kenya, there have been efforts of mapping stakeholders, and, in this context, a working group of local community members was established.

➢ **Changes in practices of state actors:** Initial feedback was provided in relation to how the project has led to changes in the practices of state actors. For example, in Zambia after a radio programme with local leaders, a reduction in the number of land disputes was observed and local authorities were reported to have changed the way they engage with people affected by land issues and with CSOs representing their interests. It was also reported that duty bearers in other countries have become somewhat more responsive to requests for information (Kenya, Zimbabwe, Cameroon). For some of the countries, goodwill of state actors at national and local level was illustrated by these actors now inviting the NCs to engage in discussions on land issues (Kenya, Uganda, Ghana) and / or suggesting joint activities, e.g., awareness raising (Ghana). For example, in Ghana, and as reported for the project target areas, state actors are engaging directly with traditional leaders for the first time, with the project providing a platform for them to meet. Moreover, in Ghana, the Lands Commission acknowledged internal integrity issues, and welcomed the cooperation with the NC in awareness raising / capacity development activities as the NC being ‘external’ to government commanded the necessary levels of trust to mobilise local communities to engage with project activities.

➢ **Changes in practices of private sector actors:** Awareness raising campaigns by NCs are credited with contributing to first changes in practices of private sector land developers / industries. For example, in Cameroon the NC’s communication campaign was related to a private sector operator
(Sinosteel, extractive industries) starting to engage with those affected by land development.

Change in policy

➢ **Policy changes**: In Uganda, policy makers are reported having acknowledged land corruption as an issue. Similarly, in Ghana, engagement of the project with the Lands Commission is credited with the Lands Commission now considering policy changes focusing on registration of land titles. However, these are some of the very few examples of changes in policies by state actors. For the other countries, it was confirmed that such changes in policies had not yet been observed.

➢ **New partnerships are forming at global level**: Coordination with other organisations focusing on land issues (International Land Coalition, Land Portal etc.) has brought prominence to the issue of corruption among land experts. The ‘land sector’ is characterised as very technical (legal / administrative) and the project is strengthening discussions around the governance dimension to this sector.

34. In discussion of emerging changes in behaviour, practice and policy, stakeholders identified a series of **factors conducive to effectiveness**:

➢ **Involving local partners / experts with strong networks in local communities**, thus allowing efficient access to relevant target audiences. In some cases, the NCs could make use of networks (including with an interest in land issues) that existed before the project.

➢ **Treating local partners as equal partners** by listening to local partners’ concerns and ensuring transparency on available project resources.

➢ **Reaching out to leaders of local communities**, involving them in awareness raising and capacity development, and ensuring that local leaders continue disseminating information.

➢ **Good relations with state actors at local / regional level** facilitate the transfer of complaints to relevant state authorities.

➢ **Involving partners with previous experience of cooperation with TI NCs** allowed for the efficient implementation of project activities since the necessary relationship of trust already existed.

➢ Making use of **channels of communication that are actually being used by the target audience** and involving local media / journalists, e.g., television spots, YouTube, social media, radio, posters (though more language coverage is required in Madagascar), local newspapers, volunteers going door by door to speak to affected communities.
Ensuring the inclusion of team members in the NCs that have experience with land issues, including team members involved in the first phase of the project (2015-2019).

NCs also referred to ‘Stories of change’ for outcomes during the first phase of the project (2015-2019). These stories are still triggering reactions and have supported the NCs in their engagement with local partners.

35. In the context of discussing effectiveness, stakeholders also pointed to factors constraining effectiveness:

- The sheer scale and complexity of corruption, referred to by one interviewee as ‘a plate of spaghetti – you don’t know where it ends’. This also explains constraints in engaging duty bearers and the private sector, and, in several countries, key state authorities are considered to be directly implicated in corruption. Additional issues include the complicity of local leaders and intermediaries (including the legal representatives of affected populations) in land corruption and affected communities not fully engaging with the project due to fear of retribution by corrupt actors (noted specifically for Madagascar).

- Limited political will – this does not only affect the NCs’ fight against corruption but also other organisations working on less sensitive topics, exacerbated by frequent changes in the political landscape, e.g., following elections. State actors in charge of fighting corruption are reported as being defensive vis-à-vis TI, and this is explained by institutional jealousies in dealing with corruption issues (Madagascar).

- Complex governance arrangements in countries with devolved competences on land issues; for example, in Kenya, land issues fall under the remit of the 47 counties all with their own legislative function, while, in Madagascar, there was a noted lack of cooperation between relevant state actors operating at the same territorial level.

- Gaps / deficiencies in the legal framework: For example, stakeholders in Kenya noted the existence of a new policy on land (since 2021), however, this new policy has not yet been translated into the legal framework, and the laws pre-dating the policy continue to be implemented. Moreover, there is a gap in terms of legal frameworks specifically supporting the most vulnerable communities and with legal situations not covered by existing legislation that is either outdated or leaves too much room for interpretation.

- Limited access to relevant land data / lack of transparency.

- Duration of legal disputes: Land corruption cases in front of courts can drag on for decades, yet the affected communities lack the resources to
sustain such legal challenges. At the same time, there is limited availability of alternative dispute resolution mechanisms.

➢ **Challenges in engaging with state actors related to the work of NCs:** In some countries, NCs have recently exposed major corruption cases implicating state actors, and this is likely to explain a certain level of governance ‘hostility’ vis-à-vis NCs (this was noted specifically for the NC in Madagascar). In more general terms, state authorities appear reluctant to engage with NCs (not responding to requests for meetings, delaying meetings) (Zimbabwe, South Africa, Zambia).

➢ **Limited / reducing space for CSOs:** In some countries, there is restrictive legislation regarding the activities of CSOs, and NCs need to take great care to avoid harassment by state actors and to prevent local partners being harassed (this was noted specifically for Zimbabwe).

➢ **Limited resources of local partners:** In some countries, local partners are seriously under-resourced, e.g., they lack vehicles / are constrained by rising fuel prices to reach more remote areas affected by mining. State authorities also noted resource limitations in engaging with local communities on awareness raising activities, conducting inspections, and in dedicating more time to engaging with NCs. Resource limitations also affect the level of coordination between local actors, which was noted as a constraint in Ghana and Madagascar. In Ghana, this was exacerbated by the discontinuation of a formerly active network, namely the ‘Civil Society Coalition on Land in Ghana’.

➢ **Perception of the project being too short / not equipped with sufficient resources, especially with regard to achieving policy-related outcomes.** For example, the NC Cameroon noted the challenge of achieving changes in policy with an annual project budget of some EUR 40,000-50,000 and facing state actors that have been in power for decades. NCs also noted resource limitations in terms of logistical challenges for reaching affected populations in remote areas and therefore not being able to organise more visits to affected communities, and in compensating volunteers. In this context, some stakeholders suggested that the project should give more importance to rural areas, as these are comparatively more affected. Moreover, the project lacks resources / activities focusing specifically on how to help affected people with resolving land issues. For example, focus group discussions in Cameroon pointed to the project having contributed to enhanced awareness / understanding, but also that there was now an expectation for the project to help people in resolving concrete land issues. However, NC / ALAC resources are limited in terms of following up with all those affected by land corruption and reached by the awareness raising activities.
➢ The substantial efforts implied in establishing relationships of trust with affected populations: Target populations have high expectations and trust can easily be damaged if awareness raising/capacity development is not followed up by concrete actions in terms of resolving land issues. However, in some cases, expectations do not relate to the scope of the project, e.g., in Ghana, expectations of rural target groups related to support with agricultural activities and supplies, indicating that perhaps there is a need for more information by the NCs. Moreover, some of the affected populations engage in activities detrimental to the environment, which naturally presents additional challenges – e.g., making contributions to resolving land issues and land later being used for activities detrimental to the environment.

➢ TI ALACs/volunteers being confused by local communities with groups representing political and/or religious interests (Madagascar).

36. Finally, stakeholders also pointed to a series of unexpected outcomes:

➢ The project’s engagement with a series of international CSOs (WWF, ERT, ILC) is giving prominence to the issue of land corruption, and other organisations are now paying more attention to corruption issues.

➢ By working with research organisations, the project has triggered academic interest in the theme of land corruption with expectations of future research outside the scope of the project. Indeed, there are even ongoing considerations of integrating the theme of land corruption into existing academic curricula (Zimbabwe).

➢ In Cameroon, the project’s work with community leaders led to the greater understanding of their rights to participate in existing institutional arrangements to resolve land issues, namely the ‘Commissions of Findings and Evaluation’, and the community leaders have now started participating in relevant proceedings.

2.6.3. Did the programme maximise opportunities to achieve its outcomes in ways that contribute to equality and benefits for people most vulnerable to land corruption?

37. The project has led to enhanced understanding of how land corruption specifically affects disadvantaged groups, thanks to systematic research led by the Equal Rights Trust in the eight countries. This includes the understanding of how land corruption specifically affects women and other vulnerable groups, most notably affected populations in remote areas.

38. Moreover, stakeholders specifically reported enhanced confidence of women in buying land. In the past, women would ‘use’ a male relative to buy land, and only the male relative would be visible in the legal documents. Similarly, in wills,
women might have been the intended beneficiaries, but only the male heirs would appear on paper. This exclusion implied a risk for women, e.g., in case of a divorce or family dispute with the male relative.

39. At the same time, and as already noted in section 2.6.2 in the context of discussing the constraints to effectiveness, the NCs / their local partners lack resources to access populations in more remote areas, which are considered to be particularly vulnerable, e.g., in relation to land corruption involving extractive industries.

2.7. Efficiency

2.7.1. Is progress being achieved at reasonable costs? Is the programme being implemented in an economically justifiable way under the given circumstances? Are there any benchmarks to support the answers?

40. Interviews with the NCs failed to identify any instances of ‘unreasonable’ project costs. In general terms, NCs noted resource constraints, specifically those affecting the scope of advocacy activities, and the access to communities in more remote areas. The evaluation team is not aware of benchmarks to support any further development of the answer to this evaluation question.

2.7.2. To what extent are effective project management systems in place? How suitable for and conducive of positive progress is the current organisational structure?

41. Project management at the level of TI-S and the NCs is effective, as evidenced by progress with the delivery of outputs and outcomes at mid-term stage. NCs commented positively on TI-S project management. A review of the NCs’ Quarterly Reports confirmed the, on the whole, efficient implementation of the project. The NCs’ Quarterly Reports use a ‘Traffic light system’ for reporting on nine categories, namely, project implementation rate (delivery of outputs and outcomes), financial implementation, human resources, changes in the external environment, advocacy, partnerships, MEL, meeting donor requirements and risk. The traffic lights are ‘GREEN = This aspect of project implementation is going to plan’, ‘AMBER = There are issues with regard to this particular aspect, but they can be managed locally/in-country’, ‘RED = There are issues with regard to this aspect that cannot be managed locally/in-country. They require the attention from the project management team at TI-S’, ‘BLUE = This aspect of project implementation is not applicable’. The following issues are flagged (only AMBER and RED issues):

- Project implementation rate: Cameroon (Q4 2022; Q1 2023), Ghana (Q2 2023), Kenya (Q3, 4 2022), Madagascar (Q3, 4 2022), South Africa (Q3 2022)
Financial implementation rate: Cameroon (Q4 2022; Q1 2023), Ghana (Q2 2023), Kenya (Q4 2022), Zambia (Q4 2022), Zimbabwe (Q2, Q4 2022; Q1, Q2 2023), South Africa (Q3 2022)

Human resources: Cameroon (Q4 2022; Q1 2023), Ghana (Q2 2023), Zimbabwe (Q2 2023)

Changes in the external environment: Ghana (Q3, Q4 2022; Q2 2023), Kenya (Q3, Q4 2022, Q1 2023), Zambia (Q3, Q4 2022; Q1, Q2 2023), Zimbabwe (Q4 2022; Q1, Q2 2023)

Advocacy: Zambia (Q3, Q4 2022; Q1, Q2 2023)

Partnerships: Cameroon (Q4 2022), Madagascar (Q3 2022), South Africa (Q4 2022)

MEL: Ghana (Q3 2022)

Meeting donor requirements: Cameroon (Q1 2023), Ghana (Q2 2023), Kenya (Q4 2022)

Risk: Cameroon (Q4 2022), Ghana (Q3, Q4 2022; Q2 2023), Kenya (Q3, Q4 2022), South Africa (Q1 2023), Zimbabwe (Q4 2022; Q1 2023)

42. Reviewing the traffic light issues, it is worth noting that the very large majority of issues flagged (52 of a total of 55 issues) relate to issues that can be managed by the NCs (AMBER); and there have been only three issues flagged as requiring support by TI-S (RED), two for Cameroon and one for South Africa. In terms of the countries flagging issues, Uganda (0 issues), Madagascar (3) and South Africa (4) stand out for flagging very few issues; whilst the remaining countries report a similar volume of issues: Cameroon (9) Ghana (11), Kenya (9), Zambia (9), Zimbabwe (10). Of course, this is only a proxy indicator of efficiency / performance as there are likely differences in the way that the NCs assess the different categories.

43. The issues most frequently flagged include ‘Changes in the external environment’ (13 mentions, out of which 7 for 2022, suggesting limited change) and ‘Financial implementation rate’ (10 mentions, out of which 6 for 2022, suggesting an overall improvement in the situation). Only very few mentions are made of ‘MEL’ (1 mention), ‘Human Resources’ (4 mentions) ‘Advocacy’ (4 mentions, all by Zambia), Partnerships (3 mentions) and ‘Meeting donor requirements’ (3 mentions).

44. Moreover, in order to understand the challenges experienced by the NCs we also reviewed the Quarterly Report sections (for the third quarter (July-September) of 2022, to the second quarter (April-June) of 2023) on “What have been the main challenges during the quarter concerned?” and “Are there any key activities/initiatives that have been postponed/cancelled?” Using this data, we
were able to categorise challenges as external or internal. External challenges included those rooted in the actions (or inaction) of governments and beneficiaries; budgeting issues stemming from global phenomena; challenges in conducting research; and other local phenomena including Ebola outbreaks. Internal challenges included those connected to partners, including CSOs; capacity-building needs; and organisational challenges. This is shown in Table 2 below.

45. The main external challenges faced by NCs were those connected to working with governments. Four NCs experienced governments who were unwilling to cooperate, while three faced challenges stemming from changes in governments due to elections. In total, five out of the eight NCs faced a government-related challenge. Madagascar faced the most continuous challenges with government engagement, noting it as a hurdle in all four quarters analysed. Kenya also faced continuous government-related challenges, listing changes in government as a challenge for three of four quarters, and lack of engagement in one quarter. Other major external challenges included lack of participation from beneficiaries, and funding-related issues connecting to inflation and rising prices. Both of these were faced by four NCs. Moreover, the Cameroon NC faced challenges stemming from all three of the aforementioned causes.

46. The main internal challenges faced by NCs were those connected to partners. This includes unavailability of partners, communication challenges, delays rooted in partners, and a lack of in-country CSO networks. Partner challenges were faced by seven of eight NCs, with South Africa and Zimbabwe facing the most continuous in three out of four quarters. Challenges rooted in internal workings of NCs were also common, and included staff changes, internal bureaucracy, and delays. These were faced by five out of eight NCs, with Kenya facing them most continuously in three out of four quarters.
Table 2 – Main challenges experienced across NCs

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<tr>
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<th>Cameroon</th>
<th>Ghana</th>
<th>Kenya</th>
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<tr>
<td>‘External’ challenges</td>
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<tr>
<td>State actors not engaging with NC for research / other project activities</td>
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<td>Q3, Q4 22; Q1, Q2 23</td>
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<tr>
<td>Low turn-out/response rate</td>
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<tr>
<td>Research complexities</td>
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<tr>
<td>Government / administration staff changes (following elections) / political tensions</td>
<td>Q3, Q4 22; Q2 23</td>
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<td>Q1 23; Q1, Q2 23</td>
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<tr>
<td>Beneficiaries reluctant to file complaints / lack the knowledge to do so / lower women’s participation</td>
<td>Q4 22</td>
<td>Q3, Q4 22</td>
<td>Q3, Q4 22</td>
<td>Q1 23</td>
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<td>Inflation / increased travel costs / funding issues</td>
<td>Q2 23</td>
<td>Q3, Q4 22; Q2 23</td>
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<td>Q1 23; Q2 23; Q2 23</td>
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<td>Ebola outbreak slowing pace of work</td>
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<td>Q3, Q4 22</td>
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<td>‘Internal’ challenges</td>
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<tr>
<td>Delays by partners / partners being unavailable / communication challenges with partners / communities / Lack of CSO networks (e.g., for joint advocacy and research)</td>
<td>Q4 22</td>
<td>Q4 22</td>
<td>Q4 22; Q2 23</td>
<td>Q3, Q4 22; Q2 23; Q2 23</td>
<td>Q1, Q2 23</td>
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<tr>
<td>Little activity by some working groups / lack of consensus among communities</td>
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<td>Q1 23</td>
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<td>Need for capacity building</td>
<td>Q1, Q2 23</td>
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<tr>
<td>NC staff changes / internal bureaucracy / delays</td>
<td>Q1 23</td>
<td>Q3, Q4 22; Q1 23</td>
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<td>Q1 23; Q1, Q2 23</td>
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2.7.3. To what extent was TI-S’ support to national chapters effective and how could that support be improved over the remaining duration of the programme?

47. Looking first at support in terms of project management / advice on project content, the NCs strongly commended TI-S for the support received and for their availability to resolve issues. In this context, the NCs noted their appreciation of the monthly check-ins and quarterly meetings between NCs and TI-S. Discussions with NCs failed to generate recommendations for improving support by TI-S.

48. Turning to ‘financial support’, that is resources allocated to project activities in the eight countries, there is a perception of resources at country-level being modest in terms of needs (e.g., efforts implied in engaging with state actors, reaching vulnerable populations in remote areas, meeting expectations in terms of resolving land issues). At the same time, there is a perception of substantial resources being allocated to headquarter-level activities. NCs also suggested that, ideally, project funds should be disbursed in a more timely manner to NCs.

49. There might be scope for developing mutual support between NCs. At the mid-term stage, there has only been limited direct contact between NCs, though in some cases, contacts have implied important learning; for example, the NC in Uganda noted having learned from other NCs about the ALACs, as this approach does not (yet) exist in Uganda.

50. Finally, NCs might benefit from additional support on reporting / monitoring. With regard to monitoring, such as in terms of cases resolved, NCs noted resource constraints, and explained that people affected don’t provide feedback, and NCs lack resources to follow up. There might be confusion in the understanding of the indicator on ‘ALAC cases resolved’ (the indicator is designed to measure if a case is closed, referred or resolved by the ALAC). Note that the validation meeting with the NCs pointed to the need for additional support on data collection.10

2.8. Sustainability

2.8.1. What is the significance and durability of policy and practice changes won, and any precedent-setting or ‘positive feedback-inducing’ effects they have?

51. At mid-term stage, it is too early to comment with confidence on the significance and durability of change in practice and policy. As discussed in section 2.6.2 on progress with the achievement of outcomes, there is substantial evidence of

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10 Poll conducted in the context of the validation meeting for this evaluation, involving TI-S and six NCs, 20 November 2023.
changes in behaviour, but more limited evidence of changes in practices and very limited evidence of changes in policy. This is to be expected at mid-term stage. Changes in behaviour have a strong likelihood of being durable, but this requires a continuation of awareness raising activities, and most importantly, access to practical support for affected communities to resolve land issues.

52. Several factors are conducive to sustainability:

➢ NCs are fully aware of the possibility of project funding ending in 2025 and are giving thought to identify local resources to ensure a continuity of project outputs and outcomes. This also applies to local partners, as evidenced by some of the local partners providing recommendations for ensuring sustainability. For example, local partners in Kenya suggested engaging systematically with ‘Community Justice Centres’, an institution recognised by the ‘Legal Aid Act’ (2016). In this case, there are one to two centres per county and 25-30 in Nairobi, and these centres could ‘institutionalise’ awareness raising and capacity development activities with a view to ‘educating’ local communities on land issues.

➢ There are features pertaining to project design that are conducive to sustainability, including, most notably, the project’s focus on selected areas and target groups, which ensures that resources are ‘concentrated’ with maximum potential for effectiveness / impact. Similarly, the project’s use of ALACs, and thus the ‘institutionalisation’ of legal advice is very likely to benefit sustainability, e.g., Madagascar saw the establishment of four ALACs, while one additional ALAC was established during the first phase of the project (2015-2019).

➢ Sustainability benefits from excellent relations with local CSO partners, and in some cases, good relations with local / regional- level state actors.

53. Stakeholders noted challenges to sustainability, including:

➢ Some participants in project activities are perceived to have developed a sense of frustration over the scope of project activities or are expected to develop such a frustration in the future upon seeing their cases still unresolved. Indeed, participants have developed insights into their rights and are now seeking support to resolve land issues, such as legal support to resolve land issues or obtain justice in corruption-related cases. However, NCs and their local partners have noted resource constraints in terms of providing support beyond awareness raising / capacity development. In this context, NCs have discussed anticipation challenges in relation to the management of expectations.

➢ The capacity of NCs to sustain activities beyond the end of project funding is a concern in some countries. This is explained by the mixed experience in terms of raising funds and that some of the NCs have experienced challenges
in the recent past in terms of maintaining staff and staff turnover (e.g.,
Cameroon, South Africa, Zimbabwe). Moreover, some NCs have,
comparatively, more limited experience with land corruption and rely on
external expertise to cover this theme (Ghana was noted as country with a
substantial track record of working on land corruption and good in-house
expertise, whilst South Africa, Zambia and Zimbabwe had expertise on
corruption, but not with a specific focus on land issues).

2.8.2. The extent to which the project seeds other projects / initiatives by
generating greater evidence of the need to act, and by identifying destination
countries where advocacy is needed? The alignment of the project with
organisational strategy at TI?

54. There is initial feedback of the project having triggered the development of other
relevant initiatives. For example, the experience with the project has led to the
launching of a new initiative in Cameroon, focusing on young people ('Sustainable
Mindset Shifts in the Younger Generation'). There are also prospects for future
spin-off projects with German government /GiZ support; indeed, the latter has
already reached out to NCs to provide support.

2.8.3. Enduring commitment of duty-bearers to the solutions that the project
proposes?

55. At mid-term stage, there is only limited evidence of duty bearers committing to
project 'solutions'. However, first examples do exist, most notably with the case
of the Lands Commission in Ghana acknowledging internal integrity issues and
committing to cooperating with the NC on awareness raising / capacity
development activities. The Lands Commissioning is also considering policy
changes focusing on registration of land titles.

2.8.4. The depth of engagement of partners, affiliates and target groups and their
likely future engagement?

56. TI-S and the NCs have systematically engaged with relevant partners. Local
partners specifically commented on their appreciation for their cooperation with
the NCs, highlighting features of this cooperation such as being considered an
equal partner and NCs being responsive to suggestions from local partners. This,
and the fact that many local partners look back on a well-established history of
cooperation with NCs, suggests that partners are very likely to continue engaging
with the NCs.
3. Conclusions and recommendations

58. This section presents a series of conclusions and recommendations.

3.1. Conclusions

59. 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 actually being used by the target audience.

3.2. Recommendations

60. 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 NCs:

➢ Support NCs 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 NCs on the extent to which NCs 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. 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 NCs 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 NCs 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 NCs maintain their contacts with local partners involved in research activities, most notably to inform them about future project activities.

➢ **Explore potential for exchanges between NCs:** At mid-term stage, NCs have only had limited contact between each other. There is a perception among some NCs 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 NCs have engaged with each other, and it is recommended that TI reviews the potential for stronger engagement between NCs (asking NCs 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 NCs’ 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 NCs the feasibility of systematically collecting data on outcomes, including in the Quarterly Reports. Finally, there might be benefit in organising a dedicated meeting on indicators and ‘human interest stories’ for TI-S and the NCs 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.
Annex 1 – Evaluation questions

Annex 1 presents the evaluation questions.
### Table 3 – Evaluation questions

<table>
<thead>
<tr>
<th>Evaluation question (ToR)</th>
<th>Operationalisation of the evaluation question (interview question)</th>
<th>Approach to data collection</th>
</tr>
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<tbody>
<tr>
<td><strong>Relevance and coherence:</strong> To what extent does the programme align with the priorities and policies of the target groups, TI, the land governance community and the donor?</td>
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</table>
| To what extent is the programme aligned with and contributing to the global TI Strategy 2030: Holding Power to Account and the TI-S Strategic Plan 2023-2026, including mainstreaming our commitments and principles? | 1. Which project features speak to TI strategy?  
2. How were TI strategy elements integrated in project design? | Desk research  
Interviews: TI-S |
| Are the activities and outputs of the programme consistent with the set goal, long term objectives, and outcomes of the programme? | 3. How do project activities contribute to outcomes and objectives?  
4. Are any activities missing? | Interviews: TI-S, NCs |
| Does the project respond to the needs of those impacted by land corruption? | 5. Who are the groups most affected by land corruption?  
6. What are the needs of those affected by land corruption?  
7. How do project activities address needs? | Interviews: NCs, State / CSO partners in the eight countries |
| Does the project address a clear and identified need? (covered by questions 4 & 5) | | |
| How coherent/complementary is the programme with other major civic-led initiatives being undertaken in the area of land governance at global, regional and national levels? | 8. What other initiatives address land corruption?  
9. How do you coordinate with other initiatives? | Interviews: TI-S, NCs, State / CSO partners in the eight countries |
| How well have TI-S and TI chapters used partnerships to strengthen the effectiveness of the project and to avoid duplication? | 10. Do you cooperate with other actors to combat land corruption?  
11. Are there examples of synergies deriving from cooperation with other actors? | Interviews: TI-S, NCs, State / CSO partners in the eight countries |


<table>
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<tr>
<td><strong>Effectiveness:</strong> Assessment of how far the intended outcomes were achieved in relation to targets set during the design phase of the overall programme and the initiatives developed by participating chapters and partners</td>
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| What progress has been made so far against the envisioned outcomes and outputs? To what extent is the project on track? What main factors have played a role in the achievement or non-achievement of the outcomes and outputs? How could the effectiveness of the programme be improved? | 12. Has the project led to changes in behaviour, practice and policy?  
13. Have there been any unexpected outcomes?  
14. What are the factors explaining the achievement of outcomes?  
15. What are the factors constraining the achievement of outcomes?  
16. What can be done to strengthen the achievement of outcomes? | Desk research (including monitoring data for indicators)  
Interviews: TI-S, NCs, State / CSO partners in the eight countries |
| Did the programme maximise opportunities to achieve its outcomes in ways that contribute to equality and benefits for people most vulnerable to land corruption? | 17. How have outcomes benefited people most vulnerable to land corruption? | Interviews: NCs, State / CSO partners in the eight countries |
| **Efficiency:** To which extent does the intervention deliver, or is likely to deliver, results in an economical and timely way |                                                                                                                                 |                             |
| Is progress being achieved at reasonable costs? Is the programme being implemented in an economically justifiable way under the given circumstances? Are there any benchmarks to support the answers? | 18. Are sufficient financial and human resources allocated to project implementation? | Interviews: TI-S, NCs |
| To what extent are effective project management systems in place? How suitable for and conducive of positive progress is the current organisational structure? | 19. What are arrangements for management at the level of TI-S, at the level of the NCs?  
20. What are arrangements for monitoring? | Desk research  
Interviews: TI-S, NCs |

11 This question can only be answered if TI-S can provide benchmarks.
<table>
<thead>
<tr>
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<th>Approach to data collection</th>
</tr>
</thead>
</table>
| To what extent was TI-S’ support to national chapters effective and how could that support be improved over the remaining duration of the programme?\(^{12}\) | 21. What are arrangements for cooperation / coordination between TI-S and NCs?  
22. How can TI-S enhance its support to NCs?                                                                                                                                                                                                                     | Interviews: TI-S, NCs                                                                     |
| **Sustainability:** How effectively is the project planning for sustainability, including the following aspects |                                                                                                                                                                                                                                                                       |                                                                                           |
| the significance and durability of policy and practice changes won, and any precedent-setting or 'positive feedback-inducing' effects they have | 23. What is the scope for outcomes to be maintained beyond the end of the project (evidence of resources allocated to maintaining outcomes / ensure continuation of activities, institutionalisation of outcomes etc.)? | Interviews: NCs, State / CSO partners in the eight countries                               |
| the extent to which the project seeds other projects / initiatives by generating greater evidence of the need to act, and by identifying destination countries where advocacy is needed | 24. Have there been any spin-off projects?                                                                                                                                                                                                                           | Interviews: TI-S, NCs, State / CSO partners in the eight countries                        |
| the alignment of the project with organisational strategy at TI | (covered by questions 1 & 2)                                                                                                                                                                                                                                         |                                                                                            |
| enduring commitment of duty-bearers to the solutions that the project proposes | (covered by question 21)                                                                                                                                                                                                                                           |                                                                                            |
| the depth of engagement of partners, affiliates and target groups and their likely future engagement | (covered by question 21)                                                                                                                                                                                                                                           |                                                                                            |

\(^{12}\) The ToR include this question under the evaluation question of effectiveness; we suggest moving the question to the evaluation criterion of efficiency.
Annex 2 - Consultations

Annex 2 lists the stakeholders consulted.

<p>| South Africa | Built Environment Support Group | 21 September 2023 |
| Kenya | Surplus People’s Project | 22 September 2023 |
| Kenya | Kiambiu Justice and Information Network | 25 September 2023 |
| Kenya | Media (Alloys Musyoka) | 26 September 2023 |
| Kenya | National - Civil Society Organisation (Zedekiah Adika) | 28 September 2023 |
| Kenya | Local CSO - Ushauri - Urban - Peri urban set up | 19 September 2023 |
| Kenya | Kenya Land Alliance - Land Sector State and Non-State Actors Network | 27 September 2023 |
| Zimbabwe | Bulawayo City Council | 25 September 2023 |
| Zimbabwe | Midlands State University | 27 September 2023 |
| Zambia | Zambia Land Alliance | 28 September 2023 |
| Zambia | Byta FM (Choma District) | 27 September 2023 |
| Uganda | Oxfam Uganda, JIMMY Ochom | 2 October 2023 |
| Regional / Global | International Land Coalition | 22 September 2023 |
| Regional / Global | Land Portal | 22 September 2023 |
| Regional / Global | TMG Think Tank | 25 September 2023 |
| Regional / Global | World Wildlife Fund | 21 September 2023 |
| Regional / Global | Equal Rights Trust | 21 September 2023 |
| Regional / Global | GIZ Land Team | 6 October 2023 |
| Donor | BMZ | 22 September 2023 |
| TI | Samuel Kaninda (Regional Advisor for Africa) | 20 September 2023 |
| TI | Robert Mwanyumba | 2 October 2023 |</p>
<table>
<thead>
<tr>
<th>Brice Böhmer (Climate and Environmental Lead)</th>
<th>4 October 2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>Daniela Patiño Piñeros (Programme Lead Public Resources)</td>
<td>28 September 2023</td>
</tr>
<tr>
<td>TI Kenya</td>
<td>5 September, 11 October 2023</td>
</tr>
<tr>
<td>TI Cameroon</td>
<td>7 September 2023</td>
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<tr>
<td>TI Ghana</td>
<td>7 September 2023</td>
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<tr>
<td>TI Madagascar</td>
<td>7 September 2023</td>
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<tr>
<td>TI Zambia</td>
<td>8 September, 19 October 2023</td>
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<tr>
<td>TI South Africa</td>
<td>8 September, 19 October 2023</td>
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<tr>
<td>TI Zimbabwe</td>
<td>13 September, 10 October 2023</td>
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<tr>
<td>TI Uganda</td>
<td>23 October 2023</td>
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</tbody>
</table>
Annex 3 – Assessment of project indicators

61. This annex presents our assessment of the project indicators. We first review the quality of the indicators and then present data on progress achieved as substantiated by the indicators.

Quality of project indicators

62. We have reviewed all 34 of TI’s indicators for the Land and Corruption in Africa – Phase II\(^13\) project as described in the project’s MEL framework using SMART methodology. SMART is an acronym which stands for:

- **Specific**: is the indicator narrow and specific, with clear steps in mind for achieving it?
- **Measurable**: can evidence be tracked to monitor progress toward the indicator? Is there a specific number to be achieved within a given time?
- **Achievable**: can the indicator realistically be completed within a given timeframe?
- **Relevant**: does the indicator align with the objectives of the project?
- **Time-bound**: is the indicator set within an appropriate timeframe?\(^14\)

63. Additionally, we have reviewed the 23 indicators described in TI’s initial approved project proposal to the German Federal Ministry for Economic Cooperation and Development (BMZ)\(^15\) using the same SMART criteria. Given that most of these 23 indicators were similar to those found in the MEL framework, we have also compared the two when relevant.

64. Our initial analysis of the LCA-II project indicators found that all but a few to be achievable. Most are also specific and relevant. This indicates that TI is

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\(^{13}\) Transparency International (2022), Land and Corruption in Africa – Phase II MEL Framework, 9-13

\(^{14}\) [https://www.techtarget.com/whatis/definition/SMART-SMART-goals](https://www.techtarget.com/whatis/definition/SMART-SMART-goals), drawing on Doran (1981)

\(^{15}\) Transparency International (2021), Proposal to the German Federal Ministry for Economic Cooperation and Development (BMZ) Land and Corruption in Africa Phase II, 17-28
choosing many indicators that can easily be developed into clear steps toward progress, while remaining significant to the project’s goals and able to be accomplished within its timeframe. This is the case for both the MEL framework and project proposal indicators. Moreover, all indicators are time-bound, with a target date of 2025 representing the end of the project, while the majority are measurable due to having a specific quantification that the project aims to reach.

65. **In terms of specificity, many of TI’s indicators can be further improved** by adding clear definitions of the terms used for the indicators. For example, indicator 1.1 (# of stakeholder engagement opportunities organised at regional and global forums on land governance) does not define “engagement opportunity,” leaving some questions unanswered as to what it seeks to examine. This in turn undermines the indicator’s ability to be measurable, as without a clear definition, it is uncertain what can be measured. It also decreases relevance, considering that without knowing what an engagement opportunity is, one cannot easily determine whether they are relevant to the LCA-II project. Overall, TI’s project proposal indicators are made more specific than the MEL indicators by providing information such as specific locations, types of stakeholders to target with activities, and types of outreach activities.

66. Finally, **the LCA-II project indicators in the MEL framework can be considered measurable and time-bound.** Table 5 below shows how many of the LAC-II project indicators meet each SMART criterion.
Table 5 – Project indicators assessed against SMART criteria

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Number of Indicators That Meet Criterion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Specific</td>
<td>17</td>
</tr>
<tr>
<td>Measurable</td>
<td>22&lt;sup&gt;16&lt;/sup&gt;</td>
</tr>
<tr>
<td>Achievable</td>
<td>29</td>
</tr>
<tr>
<td>Relevant</td>
<td>21</td>
</tr>
<tr>
<td>Time-bound</td>
<td>21&lt;sup&gt;17&lt;/sup&gt;</td>
</tr>
</tbody>
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Progress achieved as substantiated by indicators

67. The following assessment presents progress achieved as substantiated by the project indicators. This draws on a systematic review of the NCs’ Quarterly Reports.

68. Progress is measured through 37 indicators. Within the project documentation, there are two main documents that describe the indicators. These are the project Monitoring, Evaluation, and Learning (MEL) Framework, which contains 34 indicators, and the original project proposal, which contains 23 indicators. There are 20 indicators in the project proposal that align with an MEL framework indicator, while three from the project proposal do not appear in the MEL framework. Likewise, 14 of the indicators from the MEL framework do not appear in the project proposal. This close alignment is due to the MEL framework indicators having been developed based on the project proposal indicators after a review process from BMZ. Many are extremely similar, with only slight tweaks in the language.

69. This analysis considers 245 alignments between activities carried out by the eight NCs involved in this project and project indicators. Through it, we can best understand which types of activities have been prioritized for the first part of this project, and to what extent different stakeholders have been targeted.

70. For this analysis, we have followed the methodology of organising indicators in the project MEL Framework, which is by stakeholder. There are twelve categories of stakeholders listed in the MEL framework.<sup>18</sup> We collected data on project

<sup>16</sup> 22 of 23 project proposal indicators are measurable.

<sup>17</sup> 21 of 23 project proposal indicators are time-bound.

<sup>18</sup> Regional and Global Bodies, Government - National Level, Private Sector, CSOs, ALACs, Investigative journalists, Media, Educational/academic entities, Local and district level authorities, Traditional authorities, Transparency International, and Communities
activities from the quarterly reports provided by each Transparency International chapter involved in the project and created an “other” category for activities which did not align with any listed indicators.

71. A main challenge in data analysis was that the activities listed in the quarterly reports were not listed alongside the indicators they represent. We had to infer which indicator they best aligned with based on the activity descriptions, which could prove difficult especially when two indicators could sometimes be described in similar ways. In these cases, small differences in wording could determine with which indicator the activity would align; for example, whether the activity description was centred around the number of people who were reached, or centred around the type of meeting or engagement.

72. Likewise, many activities fit more than one indicator. Therefore, while there were 245 alignments analysed, the actual number of activities carried out by the eight NCs is undoubtedly smaller.

**Activity/Indicator Alignments per Stakeholder**

73. The first level of analysis conducted was the number of activity/indicator alignments per stakeholder category, as determined by the LCA-II MEL framework.

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19 For example, “2.1: # of national decision-makers reached through stakeholder workshops, meetings and dialogues on recommendations to reform land laws and procedures to close corruption gaps and loopholes by level of seniority,” and “2.2: # and frequency of meetings with national decision-makers.”
74. Figure 1 below shows how many alignments there were per stakeholder category.

**Figure 2 – Activity / Indicator alignments per stakeholder**

![TI LCA-II Activities per Relation to Stakeholder](image)

75. As indicated by the figure above, most LCA-II activities for this reporting period have targeted communities (44 activity/indicator alignments). Within this category, 24 corresponded to indicator 12.2: # people reached through dissemination campaigns by type of activity and geographic focus (urban/rural). Types of activities categorised into this specific indicator include community-based activities that specifically mention the number of people reached, including public engagement and sensitisation meetings, radio programmes, the production of a newsletter, and awareness-raising campaigns. On the contrary, only one activity within the communities category aligned with indicator 12.4: Evidence of impact of project interventions or/and results on people's lives. This alignment occurred as part of an advocacy activity in Madagascar, after which a group of farmers supported by Transparency International took their complaint to court and won.

76. Other stakeholder groups that were heavily targeted by activities in this reporting period include Transparency International (42 alignments), CSOs (28 alignments), Governments at the national level (25 alignments), and ALACs (23 alignments). Additionally, there were 31 activity/indicator alignments that fell into the “other” category. Examples of activities categorised as “other” include MEL activities, meetings with GIZ, materials development, planning dissemination
strategies, and meetings involving categories of stakeholders that did not have meetings listed as a key performance indicator.\textsuperscript{20}

77. Considering the stakeholder categories with the lowest number of alignments between indicators and activities, local and district level authorities had the fewest (three alignments). This could be in part due to the limited nature of indicators under this stakeholder category: the only one listed is “Cumulative # of local and district level authorities trained on land and corruption.” Other activities included components that involved local and district level categories but could not be categorised under this indicator due to its very limited definition.

Activity/Indicator Alignments per Country

78. We have also conducted analyses of activity/indicator analyses at the country level, to better understand any differences that might exist in where different country chapters are targeting their project activities. The number of alignments per country differed greatly, from a low of 14 in South Africa to a high of 59 in Kenya.

79. Cameroon has 16 alignments between national-level LCA activities and project indicators, covering six stakeholder categories in addition to the “other” category. Most of its alignments concern the Transparency International category, with all seven pertaining to research-related activities conducted by the team. In addition, Cameroon had one activity or component of an activity each targeting the private sector, national-level government officials, ALACs, and educational/academic entities. Figure 3 below summarises Cameroon’s activity/indicator alignments.

\textbf{Figure 3 – Activity / Indicator alignments - Cameroon}

\textsuperscript{20} For example, the stakeholder categories of local and district level authorities and of traditional authorities do not count meetings among their indicators.
80. Ghana has 28 alignments between national-level LCA-II activities and project indicators, covering eight stakeholder categories in addition to the “other” category. Representatives from the media are its most-targeted stakeholder, with six activities including radio and TV programmes that brought awareness to national land corruption issues and policies, and the work done to combat land corruption by Transparency International. Figure 4 below summarises Ghana’s activity/indicator alignments.

**Figure 4 – Activity / Indicator alignments - Ghana**

81. Kenya has 59 alignments between national-level LCA-II activities and project indicators, the most of any participating country. These cover ten stakeholder categories, in addition to the “other” category: the only two stakeholder categories not covered by Kenyan activities are Traditional Authorities and Investigative Journalists, each of which have fewer than ten activities targeting them total across the entire scope of the project. Like in the national analysis, the most targeted stakeholder in Kenya is communities. Activities in Kenya which target communities include public forums and engagement, and a legal awareness webinar. Additionally, Kenya has noted that community stakeholders have agreed to petition relevant government entities in the wake of Transparency International’s public forums. Figure 5 below summarises Kenya’s activity/indicator alignments.

**Figure 5 – Activity / Indicator alignments - Kenya**
Madagascar has 34 alignments between national-level LCA-II activities and project indicators, covering eight stakeholder categories in addition to the “other” category. Like in Ghana, Madagascar’s local Transparency International chapter is the most targeted stakeholder through activities. Most of these activities consist of research, be it through mapping or interviews, however joint CSO advocacy initiatives also took place in the context of a local land dispute. In addition, activities and/or activity components in Madagascar have targeted investigative journalists more than in any other participating country. This is due to a project which sent investigative journalists to produce a project on how land corruption negatively affects indigenous people. Figure 6 below summarises Madagascar’s activity/indicator alignments.
83. South Africa has 14 alignments between national-level LCA-II activities and project indicators, covering four stakeholder categories in addition to the “other” category. The most targeted stakeholder categories are Transparency International and CSOs, which account for four activities each. These activities include research and completed studies conducted by Transparency International; and relationship-building with CSOs. Figure 7 below summarises South Africa’s activity/indicator alignments.

84. Uganda has 29 alignments between national-level LCA-II activities and project indicators, covering eight stakeholder categories in addition to the “other” category. The most targeted stakeholder categories are communities and national-level government officials; the latter of which being the only case that this is a main targeted stakeholder in a participating country. Uganda’s project team is targeting communities through activities such as the managing of a call
centre and follow-up on the issues brought to it; recruitment of paralegals at the community level; and community meetings. Additionally, the interventions of Transparency International-recruited paralegals have led to more confidence among community members in reporting land corruption issues.

85. Meanwhile, the national government has been targeted through activities such as parliamentary outreach, engaging ministries at National Land Council meetings, and meetings with relevant ministries. The results of Uganda’s efforts to engage its national government can be seen through the inclusion of land and governance in the five-year plan of the National Land Coalition; a success that wouldn’t have been possible without Transparency International Lobbying. This is the only case of change to land governance at the national level during this reporting period for the LCA-II project. Figure 8 below summarises Uganda’s activity/indicator alignments.

Figure 8 – Activity / Indicator alignments - Uganda

86. Zambia has 34 alignments between national-level LCA-II activities and project indicators, covering nine stakeholder categories in addition to the “other” category. The main stakeholder targeted through activities is communities, with seven activities including the creation of an online reporting portal aimed at citizens, sensitisation meetings, and community stakeholder trainings. Additionally, the effects of these targeted activities can be seen through the creation of a working group on land issues and an increase in reports to mobile legal clinics; both after sensitisation meetings occurred. Figure 9 below summarises Zambia’s activity/indicator alignments.
Finally, Zimbabwe has 31 alignments between national-level LCA-II activities and project indicators, covering nine stakeholder categories in addition to the "other" category. The main stakeholder targeted is ALACs, with seven activities. Zimbabwe is the only participating country where ALACs are the most targeted stakeholder. The activities involving them include mobile legal clinics, offices for walk-ins, and the resolution of cases brought forward by community members. Figure 10 below summarises Zimbabwe’s activity/indicator alignments.

Concluding the review of progress achieved as substantiated by the indicators, Kenya has the most alignments, with 59. Three countries (Zimbabwe, Zambia, and Madagascar) count between 30 and 40 alignments; two countries (Ghana and Uganda) count between 20 and 30 alignments; and South Africa and
Cameroon each have less than 20, at 14 and 16 respectively; the average number of alignments per country is approximately 31.

**Figure 11 – Activity / Indicator alignments per country**

89. The stakeholder that was most targeted in the highest number of countries was communities, which were the most targeted stakeholder in three countries as well as overall. Then, Transparency International was the most-targeted stakeholder in three countries, while ALACs, media, CSOs, and national-level governments were each most targeted in one country. The latter stakeholder overall was mainly targeted through meeting and outreach activities, which could contribute to the perception that governments have not yet been targeted. While there are actually many activities targeting national governments, there are few indications of changes to law, policy, and practice among this stakeholder. Some countries had a higher overall proportion of activities targeting lesser-targeted stakeholders, for example, investigative journalists in Madagascar and traditional authorities in Zambia.
Annex 4 – Insights from the case study visits

Insights from Cameroon and Ghana

90. Demystification of land acquisition and registration through sensibilization campaigns and Mobile Clinics in sentinel sites: The project’s demystification of land acquisition and registration, along with the introduction of grievance mechanisms, has been observed in Ghana and Cameroon. While effective, challenges in providing comprehensive judicial services are noted. The project emphasizes the critical need for awareness in the land appropriation process, particularly guiding individuals to become legal landowners. Sentinel sites, especially in rural areas with limited information on land ownership, have proven effective. The Mobile Clinic in Ghana, organized with the Land Commission and ALAC, is well-received, but resource constraints and distance from the main office in Accra limit its frequency. In Cameroon, project scope and resource disparities hinder regular visits to sentinel sites. Given the project’s aim to induce behavioural changes, a community-based approach is crucial, requiring additional resources.

91. ALAC: The ALAC introduction is a flagship element, appreciated in both countries. However, limitations in coverage, capacity, and resources exist. Legal aid is in high demand beyond access to land-related information, emphasizing the importance of fully addressing grievances to maintain community trust.

92. Resource management: An interesting observation was the contrasting attitudes of the Ghana and Cameroon teams regarding resource availability. While the Cameroon team expressed a significant lack of resources based on the project’s expectations, the Ghana team emphasized that expectations are limited to the allocated budget. The Ghana team focuses on optimizing the use of resources and seeking efficient ways to continue their initiatives. An increase in resources would be beneficial in improving activities on ground however they portrayed a positive attitude for efficient resource utilization.

93. Recommendations: 1. Establish ALAC focal points in each sentinel site, clarifying limitations. 2. Explore a one-stop centre for awareness, ALAC direction, and legal assistance. 3. Identify local organizations for continuous collaboration in awareness creation. 4. Facilitate lessons sharing among National Chapters, with Ghana guiding Cameroon on resource management strategies. 5. Encourage
visits, study trips between National Chapter, National Chapters conference for lessons and experience sharing.

Insights from Madagascar

94. **Mobile ALACs and volunteers ensuring increased effectiveness and supporting sustainability**: One of the challenges that has been identified as negatively affecting the project objectives is the limited knowledge of legal texts among the population in Madagascar. This issue arises to a great extent from the complexity of legal acts, which can be challenging to understand for individuals without a legal background, as well as the intricate procedures involved. Another significant challenge is the fear among the population to report cases of corruption and the absence of a culture of denunciation\(^{21}\). To address these challenges, TI-MG has introduced ALACs in six provinces across Madagascar, namely Antananarivo, Mahajanga, Toamasina, Fianarantsoa, Toliara, and Antsiranana. While the establishment of new ALACs has been positively received by various stakeholders, including Madagascar's Independent Anti-Corruption Office (BIANCO) with whom the relations have been tense, it has been noted that their presence is predominantly centred in urban and suburban areas, limiting their reach to rural communities.\(^{22}\) This poses a significant challenge when addressing land corruption, as rural communities are among the most affected and/or vulnerable groups. To get closer to the people, TI-MG introduced door-to-door activities and mobile ALACs.

95. The primary objective of door-to-door activities and mobile ALACs is to ensure that information can be disseminated effectively in hard-to-reach communities.\(^{23}\) This is achieved through the support of dedicated and trained volunteers who accompany the ALAC coordinator in the field. Typically, there is one coordinator working alongside one or more volunteers. The strategy involves organizing monthly field visits in each region. Both door-to-door activities and mobile ALAC campaigns share a common objective: to raise awareness among local populations about land corruption, their rights, and the general work of ALACs. This personalized approach is also designed to encourage individuals to voice their grievances and report cases of corruption.

96. According to several interviewed stakeholders, mobile ALACs have proven to be the most effective means of reaching people, offering information, providing advice, and collecting complaints that may later be identified as potential cases and reported to the relevant authorities. The effectiveness of this approach is visible also from the increased number of complaints received as a result of the mobile ALAC campaigns. The effectiveness is further supported by the fact that

\(^{21}\) Madagascar Quarterly Report July-Sep 2022, p.8

\(^{22}\) Narrative report LCA II 2022, p. 21

\(^{23}\) Narrative report LCA II 2022, p. 21
individuals residing in remote areas are less likely to personally visit ALACs that are located in urban or suburban areas due to long distances, limited resources and often fear.

97. Mobile ALACs have been reported as particularly encouraging for individuals to denounce cases of corruption. This in turn provides valuable inputs for investigative journalists that are supported and trained by TI-MG, potentially revealing numerous intriguing cases that are worth investigating and exposing further.

98. The presence of volunteers supporting ALACs in the field offers several advantages. Firstly, the volunteers possess an intimate knowledge of their communities, which facilitates outreach and communication efforts. They also represent a valuable resource, effectively assisting and supporting ALAC activities without the need for additional funding. During interviews, the volunteers emphasized that their participation provides them with practical experience for their professional life, especially for those studying law and a sense of personal gratification. Their participation is particularly valuable given the limited financial resources in comparison to the scale of the corruption issue in the country.

99. **Several challenges and areas for improvement have been identified**: Only a limited number of field visits per ALAC can be organised due to financial constraints, resulting in reaching fewer people than the potential demand requires. There is a need for a clear and distinctive attire or signage to avoid confusion with political or religious groups. Ensuring an adequate pool of staff for ALACs has been problematic as there is a lack of suitable people for the position of an ALAC coordinator in some provinces. As a result, ALAC activities were suspended due to resource constraints in some provinces. There is a need to continuously encouraging citizens to report cases of corruption, as many people are still restrained and fear potential consequences. Some provinces, such as Antsiranana and Toamasina, face difficulties in this regard, with low complaint statistics. This situation may be also attributed to the lack of dedicated premises for ALAC offices and, more significantly, the persistent culture of not reporting corruption that prevails in several areas of Madagascar.

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24 Madagascar annual report 2022, p.6

25 ibid.