

## Land and Corruption in Africa II (LCAII) Project Final Evaluation 2026 - Management Response

### Introduction

This management response details Transparency International Secretariat's (TI-S) response to the findings and recommendations of the final evaluation of the Land and Corruption in Africa Phase II (LCAII) project (2021-2026). LCAII, funded by the German Federal Ministry for Economic Cooperation and Development (BMZ) and implemented by TI-S and National Chapters in Cameroon, Ghana, Kenya, Madagascar, South Africa, Uganda, Zambia, and Zimbabwe, sought to address land corruption across the region.

TI-S contracted the independent evaluation firm ROCsalt on 4 September 2025 to conduct an external final evaluation of the project throughout the months September 2025 to March 2026. The evaluation team was composed of Michael Hammer and Miriam Chikwanda. The final report was submitted on 9 March 2026. The intention of this evaluation was to provide an external and independent assessment on the project's overall performance, through the OECD DAC criteria. As this evaluation was meant to complement the mid-term evaluation conducted by Blomeyer & Sanz from August to December 2023, the evaluators focused specifically on sustainability and impact, taking into account the two project phases (including Phase I from 2015 to 2019). The evaluators adopted outcome harvesting as their methodology, with a participatory GESI approach, and building on the Sentinel Communities Baseline Survey conducted at the beginning of the project's Phase II.

### Response to findings

Overall, TI-S was encouraged by the findings of the evaluation:

- It confirmed that land corruption is a **relevant** issue affecting communities' livelihoods and that the project aligns strongly with the TI Movement's strategy, BMZ priorities, and AU commitments.
- The evaluation also recognised strong internal **coherence** and good external coherence, with TI adding value by complementing other initiatives through its niche focus on land corruption.
- From an **effectiveness** perspective, the evaluation emphasised significant progress towards output indicators. Most importantly, it recorded substantial evidence of outcomes at the national, regional, and international levels. It identified meaningful progress in terms of behaviour change, including equipping and mobilising communities, as well as important advances in policy change, particularly when recognising the role played by external factors in enabling these shifts. The area where most outcomes have been observed is practice change within organisations and institutions concerned with land services and management. Overall, the evaluation confirms that the project demonstrated a clear "proof of concept." TI-S is pleased to see community engagement (through awareness raising and ALAC support), CSO coalition-building for joint advocacy combined with organisational capacity

strengthening (including support for governance services), as well as improvements in GESI practices, have been identified as key pathways for achieving the project's goals.

- In terms of **efficiency**, the evaluators assessed that the project demonstrated fair value for money. TI-S is particularly encouraged by the strong results achieved at the national level relative to the overall scale of the project's budget. TI-S also appreciates the evaluators' recognition of the project's efforts to build strategic partnerships and to strengthen adaptive management through improved monitoring systems and peer learning.
- TI-S considers very positively the extent of the **impact** already measured at this stage, both in terms of establishing land corruption as a recognised field of intervention and contributing to its normalisation in policy discourse. TI-S is also encouraged to see significant impact already emerging at the community level, including among groups marginalised in land systems, as well as within CSOs. These impacts include shifts in knowledge, confidence, and behaviour, with land corruption increasingly being challenged rather than tolerated, by communities themselves and in some notable instances by direct measures/reforms led by authorities.
- In terms of **sustainability**, TI-S welcomes the recognition that sustainability has been embedded within the project from the outset within the project's theory of change. TI-S is pleased to see that ALACs, CSO coalitions, trust-building with communities, academic partnerships, policy influence, and digital tools all played an important and complementary role as sustainability pathways.

### Response to specific evaluation recommendations

Regarding recommendations, TI-S broadly accepts all eleven high-level recommendations made by the evaluation (attached in Annex 1).

### Specific recommendations for TI-S

#### **R1. Long-term resourcing of land and corruption work: partially accepted**

TI-S welcomes the recognition that the project contributed to raising the profile of land corruption as an important area of work and a key leverage point for advancing the broader anti-corruption agenda. The project's achievements in increasing visibility and recognition of this issue provide a strong foundation to build on. In developing its programming, TI-S is guided by the Movement-wide TI global strategy Holding Power to Account (2021–2030) and TI-S Implementation Plans, that identify Strategic Objectives (SOs). These were developed through a consultative process, and the LCA II Project has been implemented within the framework of SO1 "Protecting Public Resources", which also included work on climate governance. The recent strategic planning cycle discussions have seen a shift in prioritisation within this objective, to increase focus on public financial management and on climate governance. TI-S will therefore continue addressing issues relevant to corruption in land governance as part of its broader cross-cutting work and within related sectors, including the management of natural resources and climate governance (for instance in relation to carbon markets), as well as within the broader development agenda, including the SDGs and "leave no one behind" discussions.

At the same time, TI-S notes that using land corruption as a primary entry point may be particularly relevant in certain regional contexts, including in Sub-Saharan Africa, where the framing around land remains especially prominent at national and local levels. All chapters involved in the project continue to consider land corruption a strategic regional priority and reaffirmed this during the Africa regional meeting held in June 2025. In this context, TI-S has been supporting LCAII chapters to pursue their own fundraising efforts. This has included completing an extensive donor mapping in 2025 and providing support to volunteer chapters in developing proposals that build on the achievements of the LCA project. Together, these efforts aim to mobilise resources to sustain nationally led work focused specifically on land corruption, alongside complementary initiatives led by TI-S in which the issue would underpin a range of other programmatic priorities.

## **R2. Strengthen coalition building and institutional capacity pathways: accepted**

TI welcomes the recognition that CSO coalition-building for joint advocacy, coupled with organisational capacity building (including engagement with and support to governmental actors) has emerged as a key pathway for achieving sustainable change. These approaches have been central to the project and will continue to inform future programming. Chapters have confirmed their intention to remain engaged in the coalitions established or strengthened through the project, to the extent that funding will allow. In some cases, this will be through the support of other programmes focused on climate or broader anti-corruption work (Uganda, Kenya, Zambia), and in several instances, chapters have also initiated joint fundraising efforts with coalition partners (Zambia, Kenya).

Capacity building has also been a core pillar of the project, including innovative initiatives such as the development of educational modules and partnerships with educational platforms to broaden outreach and create multiplier effects. Strengthening institutional capacities remains a priority for TI: chapters continue to build their skills, and the Secretariat is committed to piloting new initiatives that foster learning, and offering training to partners remains a key component of TI's work. The project has also highlighted the value of mechanisms such as communities of practice and peer learning exchanges led by chapters, which are increasingly being replicated across other projects.

## **R3. Increase resourcing for chapter and regional innovation: partially accepted**

TI-S welcomes the recognition of the strong capacity of national chapters to innovate and localise effective approaches, which has been a core feature of the LCA II project. The project was among the first within TI-S to introduce flexible, multi-year sub-granting arrangements. In addition to their annual allocated budgets (set at the same level for all chapters), chapters could request additional funding of up to 50% of their annual allocation to implement further activities aligned with the project's outcomes. Although uptake varied across chapters, this mechanism introduced important flexibility and enabled several innovative initiatives. For example, six chapters received additional funding to conduct legal gap analyses, while two chapters were supported to undertake land corruption risk mapping. As a result, the share of the budget managed directly by TI-S decreased, while resources allocated through national sub-grants increased, with this budget line ultimately exceeding the initially planned allocation (115,000 Euros additional). Overall, the model was viewed positively within TI-S, as it enabled chapters to access additional resources in line with their implementation capacity.

Within the governance framework of the TI Movement, regional coordination is part of the mandate of TI-S. Regional priorities are collectively defined through regional meetings involving chapter leadership. Project-level advocacy engagements are co-developed through project meetings and revisited regularly through project quarterly meetings. TI-S typically remains responsible for leading regional initiatives and coordinating the implementation of multi-country initiatives, which facilitates a streamlined approach that leverages knowledge across the TI Movement and ensures donor compliance. However, under the LCA II project, TI-S gradually increased the ceiling for additional funding specifically to support some chapters in hosting regional activities, such as learning exchanges. This enabled chapters to take a more proactive role in facilitating regional engagement and knowledge sharing. Beyond LCA II, several TI-S-led projects in sub-Saharan Africa are currently piloting approaches involving “regional hubs”, and the results of these initiatives should help inform future programming. TI-S recognises the value of continuing to explore such models, and creating further opportunities for interested chapters to co-lead regional work, while recognising the added capacity and resourcing needs that taking on these additional responsibilities entail.

#### **R4. Focus programming to scale sustainable solutions: partially accepted**

TI-S acknowledges the importance of focused programming, and accordingly aligns its programmatic approach with the Movement-wide TI global strategy Holding Power to Account (2021–2030). In the development of its new programming, TI-S takes into account instances where a clear proof of concept has been established, where the external context creates strong opportunities for further impact, or where TI is entering a new field of work where experimentation is useful before moving to scaling up. For example, TI-S recently launched a new initiative on carbon markets, working alongside chapters in Indonesia, Cameroon and Ghana. The two latter are former LCA II partners, and this new opportunity positions them to build on lessons from their land corruption work while also exploring a new thematic area for TI, in line with its strategic priorities, testing assumptions in the theory of change, and generating learning that could inform future scaling.

Although TI-S endeavours to scale sustainable solutions and establish complementary relationships of collaboration with national chapters, many variables influence the participation of local partners in new TI-S projects, including thematic and geographic donor priorities, chapter priorities and capacities, and the financial viability of consortia-led initiatives. TI-S aims to facilitate the development of projects that leverage existing chapter strengths while also exploring new opportunities with others to build capacity and catalyse sustainability. In addition to collaborating with specific chapters on national, regional, and global initiatives, TI-S, as a structure that supports the TI Movement as a whole, also seeks to maintain a balanced approach among chapters when designing programmes. For this reason, while focused approaches can be valuable in certain contexts, programme design must also consider Movement-wide priorities and opportunities.

#### **R5. Strengthen thematic and cross-country learning on structural drivers: accepted**

TI-S recognises the importance of developing a robust analysis of the structural drivers of land corruption, including through political economy analysis and MEL systems that capture qualitative dimensions of change. Throughout the project, TI-S and chapters have expanded their work to explore several underlying

drivers and impacts of land corruption. This included research and advocacy on the intersections of land corruption with climate justice, including carbon markets (2023), with discrimination and exclusion (2024), with high-level corruption and transparency (2025) and with persistent injustices rooted in colonisation (2025). In addition, several chapters investigated the impacts of the extractives sector on land corruption following its identification as an area strongly influencing land governance during the Mid-Term Review. Through the project, the teams observed some instances of cross-country learning, such as the replication of the Land Corruption Risk Mapping exercise from Kenya to Madagascar and then Uganda. TI-S recognises the high value of internal learning mechanisms such as the Land Corruption Community of Practice to foster exchanges, as well as institutionalised spaces such as yearly Movement Summit.

Looking ahead, TI-S recognises the value of embedding analysis of thematic linkages from the outset of future programmes, including within the theory of change. At the same time, the experience of LCAII has shown the importance of maintaining flexibility, especially over longer-term projects, to explore emerging issues as they arise. New thematic directions were shaped in response to external developments, including academic research, conference agendas, emerging partnerships, dialogue with practitioners, as well as government priorities and evolving advocacy opportunities. TI-S therefore sees value in identifying key thematic areas at the programme design stage, while allowing space for further adaptation later in the project cycle, in collaboration with chapters and partners. TI-S also agrees that continued monitoring and internal learning mechanisms supports the identification of these dynamics and ensure that programming remains responsive to evolving contexts and opportunities.

#### **R6. Strengthen outcome-focused MEL systems: accepted**

TI-S recognises the value of a MEL system that captures progress at both output and outcome levels, while acknowledging the complexity of change. The LCAII MEL system incorporated three outcome-level indicators. Although this provided a solid foundation, the relatively high thresholds to capture change limited the teams' ability to report on incremental progress. Introducing indicators that reflect more nuanced progress markers and offer deeper qualitative analysis of the work undertaken by chapters and the Secretariat would have been beneficial. This gap was already identified by the Mid-Term Review.

In response, TI-S introduced Outcome Harvesting in 2024 to better document qualitative changes, explore areas of impact and challenge, and test assumptions embedded in the Theory of Change developed at the start of the project. This has enabled a more nuanced understanding of pathways of change and where these have unfolded differently than expected. In this regard, TI-S was pleased to see the recognition of these efforts in the final evaluation, which positively highlights that the MEL approach adopted in the second half of the project has been very beneficial to create a supportive and learning environment for both chapters and the Secretariat.

At the same time, TI-S is moving more broadly towards Outcome Harvesting as a key MEL approach across its projects. Capacity-building efforts are underway across the Movement to support this shift, including the introduction of outcome journals and other simple documentation tools. As with any new approach, embedding this practice and developing capacities across teams will take time, but TI-S is committed to strengthening outcome-focused learning and ensuring that future MEL systems balance outputs and outcomes from the outset.

### **R7. Integrate intersectional analysis into programme design and MEL: accepted**

In the context of the TI Strategy 2030, TI has increasingly recognised the importance of inclusive and intersectional programming. For instance, TI launched an internal global Community of Practice on GESI in 2025, with the aim of facilitating peer learning across the movement and developing tools and resources to address identified challenges. With this institutional recognition, TI and the LCAII project have intentionally increased the focus on gender and inclusion in the project, including the development of the report dedicated to the issue. More broadly, a GESI specialist started supporting the project in 2023 by reviewing activities, strengthening PMEL guidance, and improving practices related to inclusion. This support has contributed to more intentional engagement with key stakeholders and has improved the collection and analysis of disaggregated data where feasible.

Where resources and alignment with donor priorities allow, TI-S will prioritise conducting a (intersectional) gender analysis at the programme design/beginning of project stage, developing indicators that reflect the goals identified through this process, and examining progress from both qualitative and quantitative perspectives, and integrating these elements into the programme/project's theory of change. These considerations have been included in internal Gender Equality and Social Inclusion Mainstreaming Guidelines developed within TI-S and shared through the GESI community of practice. In addition, TI-S will continue to draw on data and insights emerging from its projects (including LCAII) to refine its approaches and strengthen inclusion across its work.

### **R8. Review internal administrative and reporting procedures: partially accepted**

TI-S recognises the high threshold of requirements placed on chapters when it comes to reporting, and works towards balancing them with accountability and risk management considerations. These requirements were established to meet international donor and auditor expectations, manage risks, and support chapters in building the capacities needed to apply for grants independently. TI-S plays a critical role vis-à-vis donors in ensuring responsible fund disbursement and compliance with reporting standards. Risk management and capacity strengthening are core commitments of the Secretariat towards chapters and central to its mandate within the broader Movement structure. Maintaining a degree of standardisation across the Movement is also important to ensure that high standards of accountability are consistently upheld.

At the same time, TI-S recognises that there are opportunities to streamline certain processes and introduce greater flexibility in project management. Some adjustments were already introduced from the project's mid-point following the Mid-Term Review, and positively acknowledged by the evaluation. Beyond LCAII, where donor requirements and demonstrated financial capacity of partners allow it, new TI-S led projects initiated over the past year have shifted from quarterly to six-monthly internal reporting cycles. TI-S also remains open to further reflection on whether chapter-level roles are adequately resourced from the outset of projects to meet administrative and reporting requirements.

## [Specific recommendations for TI-S and National Chapters](#)

### **R9. Sustain community engagement mechanisms: accepted**

TI-S welcomes the recommendation from the evaluation to sustain community engagement mechanisms, where funding allows. These approaches have been among the most important sustainability pathways identified by chapters to build on the project's outcomes. By strengthening the understanding of communities, as well as local, district, and traditional leaders, of the legal ecosystem, their respective roles, and the mechanisms available to seek redress, the project has helped build local ownership of these processes. This provides a stronger basis for sustaining key activities beyond the project period, allowing chapters to continue supporting them through more targeted and less resource-intensive engagement.

All chapters that implemented ALAC-related activities during the project will maintain the core operation of their ALAC(s) to continue receiving complaints and supporting clients, including on land-related issues. In Uganda, paralegal support mechanisms will be maintained to the greatest extent possible, and tools developed through the project have been disseminated by the chapter as part of its exit strategy. The teams also observed positive developments in relation to mediation and alternative justice mechanisms, which are increasingly being undertaken independently by community leaders in Cameroon, Zambia, Zimbabwe, and Kenya. These developments suggest that some of the approaches introduced through the project are beginning to be locally owned and sustained beyond direct project support. Based on opportunities, TI-S and national chapters continue to actively fundraise to maintain these activities as part of their portfolios and to support their continuation in the longer term.

**R10. Align programme expectations with chapter capacity: accepted**

TI-S welcomes this recommendation and in future projects will continue engaging with chapters through transparent bilateral discussions during both the project design and inception phases to ensure that objectives are realistic and aligned with available resources and capacities. TI-S also wishes to recognise that certain limitations may only become visible during the implementation stage. In this context, the Secretariat will continue drawing on other recommendations related to more adaptive management approaches and flexible resourcing mechanisms. These discussions should therefore not be limited to the early stages of projects but should also take place, where possible, at key implementation milestones, such as Mid-Term Reviews, project meetings, or other coordination spaces. These moments should provide important opportunities for TI-S and chapters to jointly reflect on project progress, revisit the assumptions from the Theory of Change and the MEL framework where needed, and realign expectations based on contextual developments and (un)validated pathways of change. Where adjustments are required, TI-S will ensure that these are communicated to the donor in a timely manner through regular reporting and other available coordination mechanisms, so that expectations remain aligned across all partners.

[Specific recommendations for the TI Movement \(strategic reflection\)](#)

**R11. Critically assess governance reforms such as digitalisation: accepted**

While digitalisation is widely recognised as a promising avenue for reducing corruption risks in land administration, TI-S agrees that such reforms should be assessed critically to better understand both their potential benefits and their limitations across different country contexts. In particular, TI-S acknowledges the importance of ensuring that digitalisation initiatives are developed with appropriate safeguards and remain complementary to other approaches, so that they do not inadvertently exclude vulnerable groups.

This principle was reflected in the project's implementation, where digital tools were complemented by other outreach and accountability mechanisms. For example, awareness-raising through radio programmes was used to broaden access to information, and advocacy efforts were developed in partnership with specialised organisations to ensure that GESI considerations were integrated into reform processes. These approaches contributed to more inclusive outcomes for groups often marginalised in land administration systems and in their access to land services. TI-S will continue to deepen attention to these dynamics in its future programming, ensuring that digitalisation initiatives are assessed not only for their anticorruption potential but also for their broader social impacts.

### Final remarks

TI-S would like to thank BMZ for their continued support of the LCA I and II projects and for enabling efforts to document and tackle land corruption in Sub-Saharan Africa.

TI-S would also like to thank the evaluators for their diligent work on the evaluation and for identifying clear and actionable recommendations for internal learning and future programming.

## Annex 1: Recommendations from the LCA II Final Evaluation

### 1. Donors and Transparency International Secretariat (TI-S)

These recommendations relate to strategic direction, programme design, and resourcing decisions.

#### R1. Long-term resourcing of land and corruption work

Equitable access to and good governance of land has been established by the project as a powerful point of leverage for driving a broader anticorruption agenda across intersecting issues of exclusion, discrimination, and development progress. TI and donors should find ways to effectively resource a continuation of work in relation to land and corruption over the long term.

#### R2. Strengthen coalition building and institutional capacity pathways

CSO coalition building for joint advocacy, coupled with organisational capacity building—including support to governmental services—emerged as key pathways for change and sustainability of results. TI and donors should focalise future practical programming using these effective approaches.

#### R3. Increase resourcing for chapter and regional innovation

National chapters demonstrated strong capacity to innovate and drive context-specific approaches. TI and donors should reflect this potential in programme design and budgets by ensuring greater resourcing of chapter-level and regional initiatives.

#### R4. Focus programming to scale sustainable solutions

Future support from donors and TI-S should consider a more focused programming approach—potentially in fewer countries—with the aim of scaling sustainable anticorruption solutions emerging from LCA experiences.

#### R5. Strengthen thematic and cross-country learning on structural drivers

Future programming supported by donors and TI-S should deepen investment in thematic and cross-country learning on structural drivers of land corruption (e.g., urbanisation, migration, extractive industries, identity-based exclusion) and strengthen MEL tracking of these dynamics.

### 2. Transparency International Secretariat (TI-S)

These recommendations relate primarily to programme design, systems management, and internal coordination across the Movement.

#### R6. Strengthen outcome-focused MEL systems

Future MEL systems for TI programmes should adopt a more balanced approach combining outputs and outcomes from the outset. TI-S should support continuous learning through coaching on outcome-focused approaches (e.g., Outcome Harvesting), qualitative outcome journaling, and simple digital tools to support documentation.

#### R7. Integrate intersectional analysis into programme design and MEL

While the project demonstrated strong attention to gender-related issues, the Theory of Change did not explicitly reflect these dimensions. TI-S should ensure that future anticorruption programmes incorporate explicit analysis of identity-based discrimination (gender, age, disability, ethnicity) within programme design and MEL systems.

#### **R8. Review internal administrative and reporting procedures**

Internal reporting procedures, funding release mechanisms, and administrative requirements sometimes created operational burdens for national chapters. TI-S should review these systems and align them with principles of efficiency, flexibility, and goal-oriented programme implementation.

### **3. Transparency International Secretariat (TI-S) and National Chapters**

These recommendations concern implementation strategies and organisational coordination across the Movement.

#### **R9. Sustain community engagement mechanisms**

Community engagement mechanisms—including ALACs, paralegal support, and mediation capacity—proved central to establishing legitimacy and credibility for anticorruption work. TI-S and national chapters should ensure that these approaches remain adequately resourced and designed with a “whole-life” approach that responds to communities’ interconnected needs.

#### **R10. Align programme expectations with chapter capacity**

The capacity of national chapters to advance anticorruption agendas varies considerably across contexts. TI-S and national chapters should engage in more transparent bilateral discussions about realistic objectives and adjust resourcing and expectations accordingly.

### **4. Transparency International Movement (Strategic Reflection)**

These recommendations relate to Movement-wide positioning and normative stance.

#### **R11. Critically assess governance reforms such as digitalisation**

Land governance reforms driven by governments, donors, and IGOs—particularly digitalisation—may have both positive and negative social impacts. As a civil society Movement concerned with social justice, TI should critically assess these reforms, identify potential harms to vulnerable groups, and address them alongside their anticipated anticorruption benefits.