

**MANAGEMENT RESPONSE TO THE FINAL EVALUATION OF
THE CITIZEN ENGAGEMENT FOR PUBLIC INTEGRITY (CEPI)
IN THE WESTERN BALKANS AND TURKEY PROJECT**

NOVEMBER 2025

INTRODUCTION

This management response outlines how Transparency International Secretariat (TI-S) and relevant National Chapters plan to learn from the findings and recommendations of the final evaluation of the *Citizen Engagement for Public Integrity (CEPI)* project, funded by the European Union and implemented across seven countries (Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, Montenegro, Serbia and Turkey) between January 2022 and March 2025.

The independent evaluation, conducted by external consultant Suzanne Mulcahy, PhD, between April and September 2025, provided valuable insights into the project's achievements, challenges, and lessons learned over its 39-month implementation. It assessed CEPI's performance using the OECD-DAC criteria and included interviews, surveys, and document review covering all national partners and the TI Secretariat.

TI-S welcomes the evaluation as a constructive and balanced review of this complex regional project. As is expected in a multi-country initiative of this scale, different perspectives emerged on some aspects of implementation. We value that the evaluator carefully triangulated, examined and balanced these views to reach an independent assessment. TI-S is committed to using the evaluation's insights and recommendations to strengthen future regional programme design, coordination and support to national chapters and partners. We are encouraged by the strong confirmation of CEPI's relevance, achievements, and contribution to evidence-based anti-corruption advocacy in the Western Balkans and Türkiye. The findings recognise the project's achievements in delivering National Integrity System (NIS) assessments in all seven countries, strengthening evidence-based policy dialogue and amplifying regional advocacy on key issues such as political financing and judicial integrity.

At the same time, TI-S acknowledges the evaluation's identification of several operational challenges, particularly regarding workload, coordination processes, and the balance between rigour and flexibility, which are being taken as valuable learning for the design and management of future regional programmes.

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RESPONSE TO FINDINGS

Relevance

TI-S agrees with the evaluation's conclusion that CEPI was highly relevant to regional and national anti-corruption priorities, as well as to TI's global strategy. The project addressed systemic governance gaps in key areas such as political integrity, public accountability and civic engagement, and successfully aligned with EU enlargement and rule-of-law frameworks. TI-S particularly values the confirmation that CEPI responded to the needs of both civil society and institutional stakeholders, and that its evidence base (notably the NIS assessments and the political finance working paper) filled an important regional knowledge gap.

Coherence

We concur that CEPI demonstrated strong internal coherence within the TI movement, combining research, advocacy and citizen engagement approaches. The project also maintained good external coherence with EU and national reform agendas, and with the work of other donors in the governance sector.

TI-S recognises the evaluation's point that coordination between regional and national levels could be further streamlined to ensure mutual clarity of roles and expectations, particularly in technically complex outputs. These observations will inform future guidance on collaborative work planning, quality assurance and communication within multi-country projects.

Effectiveness

TI-S welcomes the evaluation's confirmation that CEPI achieved or exceeded most of its output-level targets and generated tangible policy influence. The delivery of seven NIS assessments, the establishment of a corruption case database, and the development of multiple policy and communication products demonstrate strong performance in terms of achieved results.

The evaluation's recognition of CEPI's impact on policy processes, such as the use of NIS findings in EU rule-of-law reporting and legislative debates in Kosovo, Serbia and North Macedonia, underlines the programme's effectiveness in bridging research and advocacy. TI-S agrees that effectiveness varied across countries, reflecting contextual and capacity differences, and acknowledges that uneven review processes and staff turnover contributed to delays in some outputs.

Efficiency

TI-S notes the evaluation's conclusion that the project was efficiently managed overall, but that the scope and number of deliverables placed considerable pressure on available

human resources. We acknowledge this finding and agree that future project designs should better balance ambition with realistic timelines and staffing capacity.

TI-S also recognise that internal review and decision-making processes for complex products, such as NIS reports, should be further streamlined to avoid bottlenecks. While financial management and compliance were assessed as sound, greater alignment between work planning, budgeting and staffing levels will be pursued in future comparable initiatives.

Sustainability

TI-S welcomes the evaluation's observation that CEPI has generated outputs with strong potential for continued use. Notably, the NIS assessments, NIS recommendation implementation tracking and regional policy tools. The project has strengthened relationships with institutional actors and enhanced chapters' visibility and credibility in national policy debates.

We agree, that sustainability would be reinforced through more explicit strategies for institutional uptake and continued advocacy after project closure. TI-S will draw on this lesson to ensure that sustainability planning is integrated early into project design and that post-project engagement pathways (e.g., for NIS follow-up) are more clearly defined in future projects, while already building on the outputs produced in this project to fundraise for Anti-Corruption advocacy work in the region.

Impact

TI-S appreciates the evaluation's recognition that CEPI made a meaningful contribution to long-term governance outcomes in the region, despite contextual constraints. The project catalysed tangible improvements in public debate on political finance, transparency and civic participation. The evaluation also notes the project's contribution to regional learning and policy influence at EU and global levels, including CEPI's inputs to UNCAC and OGP processes. We acknowledge that while systemic change requires sustained effort beyond a single project cycle, CEPI laid critical foundations for continued progress in the Western Balkans and Türkiye.

RESPONSE TO RECOMMENDATIONS

Specific recommendations for TI-S

TI-S accepts all recommendations made by the evaluator. The Secretariat views these as constructive and aligned with ongoing efforts to strengthen regional project management, coordination, research quality assurance, and MEL systems. The CEPI experience offers valuable organisational learning that will inform TI-S design and delivery of future complex, multi-country programmes in the Western Balkans and other regions.

Recommendation	Response
<p>Strengthen Project Design and Capacity Assessment: The CEPI experience demonstrates that overly ambitious designs ultimately undermine both implementation quality and partner satisfaction. TI-S should conduct implementation capacity assessments before finalising project designs, ensuring that proposed activities align with available coordination resources and partner capacities. Future projects in the Western Balkans should prioritise depth over breadth, focusing on fewer deliverables that can be implemented effectively.</p>	<p>TI-S accepts this recommendation.</p> <p>The evaluation notes that CEPI’s broad and ambitious design placed heavy demands on both the Secretariat and chapters and project implementing partner organisations, sometimes stretching coordination capacity and affecting delivery timelines. TI-S recognises that ensuring alignment between project scope, available human resources, and partner capacities is critical for implementation quality and satisfaction.</p> <p>For future regional projects, TI already works to strengthen consultation at the design stage and ensure a more systematic assessment of implementation capacity before finalising proposals. This will include: (i) early internal consultation across TI-S functional teams to identify capacity, resource needs, and coordination requirements; (ii) structured input from partners on the feasibility of proposed activities; and (iii) a more explicit consideration of trade-offs between the breadth and depth of deliverables. .</p> <p>Where relevant, design documents will articulate the rationale for focusing on a smaller number of high-impact outputs,</p>

	<p>ensuring that quality and learning are prioritised over quantity. The experience of CEPI will directly inform TI-S internal guidance on scoping and resourcing regional programmes in the Western Balkans and comparable contexts.</p>
<p>Enhance Regional Coordination Capacity: Building on CEPI's success in establishing shared regional priorities, TI-S should develop more systematic mechanisms for ongoing collaboration that extend beyond individual project cycles. This includes creating regular platforms for regional knowledge exchange (beyond annual/regional meetings) and developing regional advocacy strategies that leverage comparative evidence across countries and align with TI-S global priorities.</p>	<p>TI-S agrees with this recommendation.</p> <p>The evaluation's recognition of CEPI's success in fostering regional collaboration and shared priorities underscores the value of maintaining such momentum beyond individual projects. TI-S acknowledges that while CEPI provided a platform for cooperation through its regional workshops and joint outputs, more structured and continuous regional coordination mechanisms would have further enhanced impact.</p> <p>Going forward, TI-S will seek to build spaces for regional exchange, learning and advocacy. This may include regular thematic coordination calls, targeted peer-learning exchanges and regional advocacy discussions convened around shared policy themes such as political integrity, judicial accountability or successful advocacy approaches.</p> <p>TI-S will also explore opportunities to better align regional evidence and comparative analysis with global TI priorities, ensuring that regional work informs and is amplified by global advocacy. The Secretariat recognises that maintaining regional engagement between funding cycles requires flexible resourcing and will consider this in the design of future programmes and fundraising efforts.</p>
<p>Improve Research Oversight and Support Systems: TI-S should address the research coordination challenges that</p>	<p>TI-S partially agrees with this recommendation.</p>

emerged during CEPI, recognising that stakeholders disagree about root causes and solutions. Before determining the optimal approach, TI-S should conduct a cost-benefit analysis to distinguish between minimum non-negotiable quality standards (essential for protecting reputational integrity) and resource-intensive standards that might be applied selectively. Future projects should consider enhanced central research coordination with additional resources for peak periods, scaled-back research coordination with greater national autonomy (understanding the risks this entails), or narrowed project scope—explicitly addressing the tension between comparative rigour required for donor credibility versus appropriate accommodation of local institutional contexts, based on realistic assessment of available resources relative to project ambitions. A new lighter-touch National Integrity Priorities tool could be a happy compromise.

TI-S agree on the importance of reviewing and strengthening our approaches to research coordination to ensure greater consistency and comparability across countries while respecting national autonomy. Balancing these two objectives has been a central challenge in multi-country research projects, and we welcome the opportunity to further refine our processes. We already apply minimum research standards through the Code of Research Ethics and the Research Standards published in 2024 during CEPI implementation. They are designed to meet TI's core purpose, producing evidence-based research to support advocacy, while carefully considering cost-benefit implications and ensure factual accuracy, traceable referencing, and the avoidance of misrepresentation or bias. These standards protect both credibility and reputational integrity without requiring academic-level outputs.

To support consistent application of these standards, TI-S will strengthen early assessments of national partners' research capacities at the start of research-intensive projects. This includes identifying capacity gaps where additional support is needed and enabling chapters to work with dedicated researchers or external experts where internal capacity cannot be developed quickly.

Central quality assurance will remain important, especially for scoring exercises and comparative regional analysis, where methodological consistency is key. To balance rigour with local context, TI-S will, where relevant, explore the use of mixed review panels involving TI-S staff, regional experts, and national researchers.

	<p>Looking ahead, TI-S will continue refining its research coordination models to uphold high quality, ensure comparability, and enable meaningful national ownership within realistic resource constraints.</p>
<p>Strengthen Results-Based Management for Learning: TI-S should ensure regional project’s MEL frameworks prioritise adaptive learning over compliance reporting, ensuring common understandings are in place of ‘what counts’ under each indicator. TI-S may consider making the MEL process less extractive by emphasising the value of MEL to implementing partners and developing systematic approaches for sharing back aggregate insights and lessons learned to partners across the region and potentially more broadly across the TI-S movement. Additionally, MEL could be more closely linked to fundraising, for example TI-S could support national chapters to develop fundraising materials on the basis of their MEL outputs (making the MEL data more usable as evidence of their impact).</p>	<p>TI-S agrees with this recommendation.</p> <p>The evaluation confirms that CEPI’s MEL framework provided accountability but could have been more effectively used as a tool for joint learning and adaptive management. TI-S acknowledges that MEL systems must go beyond compliance reporting to deliver value for both the Secretariat and partners.</p> <p>According to the newly developed project guidelines in 2024, a review process of the logical framework and/or ToC should take place. For future projects, TI-S will ensure that during the review process indicators are accompanied by shared definitions and guidance to promote consistent interpretation across partners underpinned by an appropriate MEL system. MEL focal points within chapters should also be designated, and the necessary MEL resources secured at the Secretariat.</p> <p>Future regional MEL plans will prioritise participatory learning objectives., TI-S will introduce mechanisms to share back aggregate insights and lessons with all implementing chapters - for example through concise regional community of practice reflection sessions focusing on how data is used to inform decisions and improve practices</p> <p>Additionally, TI-S recognises the potential of MEL data to support fundraising. In future programmes, TI-S will seek to assist chapters in repurposing evidence</p>

	generated through MEL systems into communication and fundraising materials that demonstrate impact to donors and partners. This approach aims to strengthen a stronger culture of evidence-based storytelling across the TI movement.
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Specific recommendations for National Chapters and project implementing partners

TI National Chapters and project implementing partners broadly agree with all recommendations made by the evaluation. They view these as constructive and relevant to sustaining CEPI’s achievements and increasing the long-term impact of their work. Collectively, partners are committed to building on CEPI’s legacy by strengthening regional collaboration, deepening the integration of research and advocacy, ensuring organisational sustainability, maximising the use of research products, and developing faster, more adaptive monitoring capacities. These actions will help maintain momentum and reinforce the role of civil society as a credible and effective voice for integrity and accountability in the Western Balkans and Türkiye.

<p>Enhance Regional Coalition Building and Knowledge Sharing: Partners should expand on the successful regional knowledge exchange and collective action elements of CEPI, by creating ongoing mechanisms for peer-to-peer learning and collaborative advocacy. This could include developing formal and informal networks where national implementing partners can share experiences, coordinate responses to common challenges, and leverage each other's expertise for mutual benefit. The Albania-Kosovo political financing knowledge sharing model provides a useful template for bilateral learning that could be replicated across the region.</p>	<p>National Chapters and project implementing partners agree with this recommendation and appreciate the evaluation’s recognition of CEPI’s success in fostering collaboration and peer exchange. The experience of joint regional advocacy and the Albania-Kosovo knowledge-sharing model on political financing demonstrated the value of learning from one another and of pooling expertise to address shared challenges.</p> <p>Building on this, they intend to further strengthen both formal and informal cooperation mechanisms. This may include establishing thematic working groups, bilateral mentoring relationships, and regional learning events that allow exchange on advocacy tactics, policy monitoring, and stakeholder</p>
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	<p>engagement. By maintaining these collaborative spaces beyond the lifetime of individual projects, partners can continue to coordinate positions, respond jointly to regional developments, and increase the collective visibility of civil-society efforts in the Western Balkans and Türkiye.</p>
<p>Improve Integration of Research and Advocacy Functions: National partners should learn from the successful examples of NIS implementation and in particular, should ensure that they strengthen multi-stakeholder validation processes that create institutional ownership of findings. In some countries, the NIS advisory group was well used and in others it was not used to full effect.</p>	<p>National Chapters and project implementing partners agree that closer integration between research and advocacy is essential for maximising impact. The evaluation rightly notes that the most successful NIS processes were those that embedded multi-stakeholder engagement throughout, from inception to validation and follow-up.</p> <p>Partners therefore aim to institutionalise these good practices by ensuring that NIS advisory groups, validation workshops and stakeholder consultations are consistently used as participatory platforms to build ownership and consensus around findings also for other research and advocacy products beyond NIS. Linking research outputs to ongoing reform debates and advocacy strategies from the outset will remain a priority. Partners will also continue to exchange experiences on how to translate research findings into policy recommendations and targeted advocacy messages that resonate with decision-makers and the public alike.</p>

<p>Strengthen Sustainability Organisational Planning: Given the challenging funding environment, national partners should continue to diversify their resource base and develop contingency planning for maintaining core anti-corruption capacity during funding transitions. This includes leveraging the enhanced credibility gained through projects like CEPI to develop new donor relationships and exploring innovative funding mechanisms that can provide more stable long-term support for evidence-based advocacy work.</p>	<p>National Chapters and project implementing partners acknowledge this recommendation and agree on the importance of long-term institutional sustainability. The funding environment in the region remains volatile, and chapters recognise the need to diversify income sources and plan strategically for continuity between project cycles.</p> <p>National Chapters and project implementing partners are committed to building on the enhanced visibility and credibility achieved through CEPI to develop new donor relationships and explore innovative financing models. This includes embedding fundraising considerations into strategic planning, broadening partnerships with domestic stakeholders, and seeking collaborations with other civil-society organisations to co-develop proposals. Sustaining independent, evidence-based advocacy requires predictable resources, and partners will continue to pursue a balanced portfolio that combines international support with national or regional funding opportunities.</p>
<p>Maximise Value from Comprehensive Research Investments: Partners should explore creative ways to leverage research investments like the NIS for multiple advocacy purposes and spin-off activities, following the example of innovative approaches developed during CEPI such as corruption barometers and cost-benefit analyses of reform progress. This could include developing systematic approaches for updating and refreshing research findings to maintain their policy relevance over time and creating user-friendly formats that can reach broader audiences beyond traditional policy circles.</p>	<p>National Chapters and project implementing partners agree with the recommendation to make full and continuous use of comprehensive research outputs such as the NIS. The evaluation highlights several creative examples from CEPI where partners successfully repurposed research data into new advocacy products. For example, corruption barometers, reform scorecards and cost-benefit analyses of legislative changes.</p> <p>Going forward, National Chapters and project implementing partners intend to adopt similar approaches to ensure that research findings remain relevant and</p>

	<p>visible. This will include producing concise policy briefs, public infographics, or digital dashboards derived from NIS data; updating selected indicators periodically as resourcing allows; and linking findings to evolving national reform agendas. Such efforts will help maintain policy relevance, extend outreach beyond expert audiences, and reinforce the use of evidence in advocacy and communications.</p>
<p>Develop Real-Time Monitoring and Rapid Response Capabilities: National partners should seek to enhance their capacity to provide the real-time anti-corruption monitoring that EU institutions increasingly require for enlargement processes and rule of law assessments. While comprehensive research like the NIS provides essential depth and rigour, partners should complement this with agile monitoring systems that can track ongoing reforms, policy developments, and corruption incidents as they unfold. This includes developing streamlined reporting mechanisms that can quickly assess whether government commitments are being implemented, creating early warning systems for concerning developments, and establishing protocols for rapid evidence gathering when EU institutions need current information for monitoring reports or policy decisions. This capacity could significantly enhance their value to EU processes while creating additional opportunities for policy influence.</p>	<p>National Chapters and project implementing partners agree that developing more agile monitoring systems would strengthen their capacity to provide up-to-date, evidence-based input into EU and domestic rule-of-law assessments. While comprehensive research such as the NIS remains vital for depth and credibility, National Chapters and project implementing partners recognise the value of complementing it with lighter, real-time monitoring and rapid-response mechanisms.</p> <p>National Chapters and project implementing partners intend to explore the feasibility of establishing simple tools for tracking reform implementation, early-warning systems for corruption risks, and streamlined reporting formats that allow timely engagement with EU institutions, national governments and media. Some chapters and partners have already begun testing policy-tracker approaches and online data visualisation tools, and these experiences can serve as models for others. Developing such capabilities will enable national partners to respond quickly to information requests, strengthen their advocacy credibility, and position themselves as key contributors to regional and EU-level transparency efforts.</p>

