

Rallying Efforts to Accelerate Progress (REAP)

Final evaluation – April 2025

Management response

Introduction

The REAP project ran from 1 April 2021 to 30 November 2024, and was funded by the European Commission Directorate-General for International Partnerships (INTPA). The project was led by the TI Secretariat and co-implemented with 14 TI national chapters based in Africa.

REAP aimed to curb inequalities in Africa by addressing its root causes, such as illicit financial flows, inadequate access to public resources by vulnerable groups, and limited social accountability. It included research, advocacy and capacity-building activities under three pillars: global and regional activities¹ - led by the TI secretariat - focusing on the impact of illicit financial flows (IFFs) on inequality, and two national pillars on tax incentives in Kenya and mining and land governance in South Africa, led by the TI respective chapters.

The main purpose of the final evaluation was to provide an external and independent assessment of achievements claimed against the results framework, also taking into account additional unforeseen effects (whether positive or negative), and a reasoned judgement of the project's contribution. It also drew out good practice examples and lessons for future work on project topics in the two focus countries (Kenya and South Africa) and for wider Transparency International (TI) programming on illicit financial flows (IFFs) under the second objective of the organisation's strategy to 2030.

The evaluation was carried out by a team of four consultants, including two based in Kenya and South Africa, combining regional and global level assessment with a closer examination of the project's national progress in the two countries.

Response to overall evaluation findings

This document summarises TI's reflections and follow-up actions on the findings and the recommendations of the review. TI welcomes the overall highly positive nature of the evaluation, in particular the significant progress it highlights against the project's expected outcomes and outputs in Kenya, South Africa and at the international level. As part of their assessment, the evaluators collected views from TI secretariat staff and 9 TI chapters via a survey. The survey snapshot covering project outcomes and outputs – e.g. increased interest among CSOs to work on project issues, more opportunities for CSOs to participate in policy development, CSO recommendations increasingly

¹ In its international advocacy, as part of REAP, TI worked at the global and regional levels. "Global" refers to TI's engagement with intergovernmental bodies and other international organisations; "regional" refers more specifically to African bodies and processes, such as the African Union.

being taken into account – shows ratings between 3.73/5 and 4.07/5². In particular, the evaluators highlight the following:

- Advocacy around people with disabilities (PWD) and with the International Monetary Fund (IMF) in Kenya, with concrete results especially at the county level.
- Contribution to closing the gap between mining-affected communities, authorities and mining companies in South Africa, with a commitment by the Minerals Council to undertake proper community consultation.
- Regarding global advocacy, the Financial Action Task Force (FATF) is now more responsive and open to inputs from TI, which is also recognised as both playing a leading influencing role itself and convening spaces to enable other actors to bring their own influence to bear. The evaluators also emphasise TI's strong influence and role in the creation of the 6th EU Anti Money Laundering directive: *"The REAP project has allowed for an intensification of some key partnerships and deepened its collaboration with key allies."*
- Beyond the project logframe, the project had an additional outcome in terms of capacity development, which is essential for enabling sustainability: *"Situated as it is within a wider and longer-term programme, the project has furthered the development of knowledge and confidence to advocate among those involved, especially Chapters."* The survey rated this aspect at 4.5/5³.

The section below examines some of the points discussed by the evaluators.

Response to individual evaluation findings

Relevance

TI welcomes the final evaluation findings which are very positive regarding the relevance of the project to TI chapters and other stakeholders. This reflects the importance of the topics of IFFs and inequalities, but also the fact that REAP has allowed TI to reach out to a broad array of stakeholders, including beneficiaries and marginalised groups, such as mining-affected communities in South Africa and people with disabilities in Kenya. Some inter-governmental organisations also acknowledge that IFFs have gained more attention, according to the evaluation report. This assessment validates our continued focus on these topics: IFFs are one of TI's seven global strategic objectives, and at national level, mining governance has been a major focus for Corruption Watch (TI's South African national chapter) for years, and TI Kenya runs programmes aligned with REAP's wider themes.

Benefits of the project

The evaluation underlines the benefits of the project (rated at 8.23/10 according to the survey).

At the international level, the REAP project allowed TI to produce new evidence and fill knowledge gaps on crucial topics such as enablers, mobilise national chapters around common priorities, deliver strong advocacy and effectively respond with partners to key developments in this space. The

² On a scale from 1 to 5, where a score of 1 is equivalent to strong disagreement with the statement, 2 to disagreement with the statement, 3 indicates a position of neither agreeing nor disagreeing, 4 agreement, and 5 strong agreement.

³ The respondents were asked whether their "knowledge and confidence to advocate on project issues had increased".

specific lens of fighting IFFs to contribute to inequality reduction efforts added an important dimension and framing to our movement's advocacy, further opening opportunities to mobilise political support and collaboration with aligned allies. Finally, the REAP project allowed the TI secretariat to more intentionally integrate the perspectives of our African chapters into our global advocacy, and to increase pressure on multilateral fora, intergovernmental bodies and individual countries in other regions that serve as transit and destination for IFFs from Africa.

We welcome the recognition by the evaluators of the importance and intention of the project working at both these levels, as IFFs from Africa can often be hidden in other jurisdictions. As confirmed by the evaluators, focusing on destination countries, as well as on reforms on the continent, may "play well in Africa".

The evaluation also confirmed the strong evidence also generated at the national level, increasing the capacity of TI Kenya and Corruption Watch to advocate and engage with decision makers. The prominence of engaging with beneficiaries and stakeholders was another important benefit of the project, and made the work even more relevant.

Balance between technical and political advocacy

The evaluation reports states that the "project has exposed tension between technical and political advocacy" and discusses the importance of choosing advocacy spaces that "are likely to bear fruit".

TI agrees with this comment and recognises that to achieve meaningful, systemic change in the IFFs space, we need to work both at political and technical levels. Political advocacy seeks to create or maintain momentum, while technical advocacy takes advantage of existing or newly created momentum to press for specific systemic solutions.

For REAP, our global advocacy approaches employed both technical advocacy and political pressure, with the chosen strategy and tactics depending on the specific advocacy target and their openness to engage.

At the technical level, we advanced specific policy solutions to address corruption and illicit financial flows, including strengthening anti-money laundering systems. This was based on past experience where some of our advocacy targets presumed that civil society had no technical expertise on anti-money laundering and used this as justification to dismiss our calls to action. Later on in the process, the additional technical expertise and evidence we brought to back up our proposals helped us to earn credibility with these targets, resulting in advocacy impact.

At the political level, we have worked to put the issue of corruption-linked IFFs on the global agenda. Our technical advocacy was only possible because of our earlier successful political advocacy efforts through which we had secured political commitments from the Special Session of the UN General Assembly against Corruption, G7 and G20 just before the start of the project.

Research

The evaluation report recognises the benefits of research in spite of earlier delays already previously noted by the 2023 mid-term review:

These outputs are widely appreciated by Chapters, allies and journalists. The statement 'there is a strong research base to the project' has the highest score of any statements rated as part of the question on strategy and project attributes (with a mean of 4.27 and a mode of

‘strongly agree’). Loophole Masters is specifically lauded as “a point of reference” for policy-makers”.

However, the evaluators note that *“the emphasis may have been too much on the depth of research than on its usability.”* We take note of the suggestion to make the research more accessible and policy relevant, while also recognising that the research into IFF risks was primarily exploratory and valuable to TI in supporting discussions around measurement and understanding IFFs, a relatively new area of research in the region, it was also important to provide a strong research base to the project (and this area of work) by developing a robust, comprehensive and innovative methodology to generate new evidence and insights. More broadly, other TI project evaluations over the past two years have also made related recommendations about the linearity of the research and advocacy phases of our project design potentially limiting the timeliness and usability for advocacy purposes, and we have already been addressing this systematically with more dynamic overlap between the two phases in new projects.

Specifically, the ‘Loophole Masters’ report was immensely valuable to our efforts aimed at generating international attention to the specific policy issues related to enablers of IFFs. As a result of our advocacy leveraging the findings, key processes in 2024 highlighted the importance of regulating and supervising gatekeepers in the non-financial sector (such as real estate agents, accountants, company formation agents and lawyers), echoing TI evidence and recommendations.

TI Kenya agrees with the identified need to *“deploy research reports in ongoing dialogue efforts to get a full return on the investment of time and money put into them”*. The chapter has been progressively disseminating the research to targeted stakeholders while holding strategic discussions with state and non-state actors and will ensure continued dissemination of key findings and support to implementing the targeted recommendations, through joint multi-stakeholder engagements with its established CSO networks across the country, at both county and national levels.

Sustainability

The final evaluation survey rates the level of confidence in sustaining the project’s results at 7 out of 10. Much of the work on the topics covered in REAP will continue because they are strategic priorities for TI and the national chapters, as noted above in the section on relevance. For the global strategic objective on IFFs, our ongoing advocacy work will be able to use the evidence and momentum generated by REAP, and hopefully achieve further future outcomes aligned with the REAP’s ultimate objectives and intervention logic.

At the project closing meeting in Berlin in November 2024, TI chapters further validated the importance of REAP’s benefits in terms of developing their capacity to advocate on IFFs both nationally and regionally, by funding in-depth research on the topic and allowing them to attend regional events. The topics of beneficial ownership, enablers and asset recovery continue to be very relevant to the region and to the ongoing national advocacy of the TI chapters.

Lessons on project management

TI welcomes the very positive assessment of the way the project was managed (criteria rated between 3.77/5 and 4.46/5 according to the survey).

We agree with the *“importance of in-person meetings at the right moment”*, and the relative flexibility of the project allowed us to create opportunities when the time was right, e.g. in

Johannesburg in August 2023, after the mid-term review, an event that was much appreciated by participating chapters, and allowed us to discuss our regional advocacy strategy.

The issue of staff turnover has indeed affected the project and created delays. Although we cannot completely avoid this risk, we are already using more active and timelier scenario and succession planning and knowledge management efforts to manage and mitigate these situations when they occur in ongoing projects.

We also acknowledge the suggestion to give more space to learning from the work done in different countries. We have done that to a certain extent, but it could be done more regularly and systematically. In response to other TI evaluations, we are also already aiming to create more opportunities and secure increased budget allocations for cross-chapter exchange in future multi-country projects.

With regard to the observation that TI may not have been as agile in its decision-making as optimal for an advocacy organisation and that the TI-S functional organisation of staff may make it 'hard for a project cutting across teams to pull things together', the TI secretariat has already initiated some major internal strategic and planning changes over the past couple of years, in parallel to the implementation of the project, which will enable more aligned and agile decision-making in future, and is already demonstrating advantages for new projects initiated since the start of REAP. These changes include a focus on 'pivot to programmes', so a more proactive, top-down approach to project selection based on global advocacy strategic objectives, rather than the more reactive donor and opportunity-driven parameters for initiating projects which was in place four years ago, when REAP started. This approach is comprehensive in terms of explicitly aligning cross-functional teams to strategic objective ('programmatic') working, clearer alignment of regional and global advocacy priorities under each strategic objective or 'programme', and the 'programme' longer-term goals heavily influencing the selection and design of which future projects are initiated to advance progress in support of those goals. It is an organisational change journey that we are still undertaking, but the drivers behind it include recognition of the opportunity and need for greater alignment, agility and cross-team collaboration to enhance the work of the TI secretariat in advancing our strategy to 2030.

Separately, we have also initiated formal cross-functional project oversight boards to oversee the implementation of all new regional and global projects, which are also actively addressing any co-ordination and other operational risks to project implementation on a regular basis.

Response on specific recommendations

In their conclusions, the evaluators made 14 recommendations. This section details our response to each of them. Out of the 14, we accept 10 (71%), partially accept 3 (21%) and we consider the last one (7%) as not applicable, which we explain below.

Advocacy in and on Africa

TI should be more systematic about how it engages Regional Economic Commissions.

Accepted – We agree with the need to increase engagement with the UN Economic Commission for Africa (UNECA). We started doing so rather late in the project but can enhance this in future projects on IFFs.

TI should reach out to other sectors with examples offered being networks of women's rights organisations and those focused on debt.

Accepted – There are examples of such engagements under REAP (with Femnet for the regional work, with Okoa Uchumi and other coalitions in Kenya), our focus on gender in the region is growing, and many of our chapters are engaging with the Tax Justice Network, for example. But we agree that overall, this approach can be strengthened for future similar projects.

Global advocacy

TI needs to maintain constant messaging about the benefits of access and the imperative of allowing sharing across jurisdictions, all framed by an overarching narrative of how beneficial ownership reform links to broader corruption issues.

Accepted – Issues related to access to beneficial ownership registers were prioritised by the project, and are still a major aspect of our work on corrupt money flows.

It should continue to deepen its defensive positions on privacy, including by engaging more with civil society groups centred on this issue.

Accepted – This effort is already underway but requires further resourcing. In February 2024, TI worked with the Civil Liberties Union for Europe and the University of Amsterdam to organise a two-day working workshop with privacy, data protection and beneficial ownership transparency experts to start to identify the delicate balance between the right to privacy / right to personal data protection and beneficial ownership transparency. The workshop exposed several key legal questions that need to be answered, and the need to resource a dedicated effort.

A greater focus on destination countries will not only play well in Africa but also addresses important gaps in IFF data.

Accepted – One of the main objectives of our global advocacy under the REAP project was to increase pressure on countries that have served as the destinations or transit for IFFs from Africa. Our analysis of IFF cases in Africa – highlighting key jurisdictions where the enablers were based and where the assets were parked – have provided hard evidence to support this effort. Additionally, as part of the project, TI urged the IMF to work with advanced economies to conduct data analyses into potentially high-risk cross-border flows, which would serve as valuable evidence for future policy reforms in these countries.

Try to generate registry data for particular sectors

Not applicable – We appreciate the suggestion; however, we do not generate registry data ourselves as this is not part of our role as an advocacy organisation.

Instead, we advocate for public authorities to improve the scope and quality of data contained in beneficial ownership and asset ownership registers, such as for real estate, in order to enable better tracking of IFFs and corruption in a variety of sectors.

Next, we advocate for meaningful conditions for access to and reuse of this data to domestic and foreign authorities, civil society, media and academia. This also supports civil society partners and private-sector entities to cross-analyse, repackage and even republish the data in a more user-friendly way.

Finally, together with partners, we also conduct the analyses of available data to identify patterns, red flags, gaps in policy or practice and suspicious cases.

Be “more conscious about our opponents”

Accepted – We regularly conduct and update our stakeholder analyses before launching into an advocacy action, which includes assessing who could oppose our advocacy and what their arguments are or might be. In some cases, we will directly engage with them in an effort to find common ground; in some other cases, we may determine it is best to move ahead with the advocacy action and monitor their reactions. In the case of enablers of IFFs, our advocacy targets were not professionals themselves – such as lawyers or accountants – as we sought action from intergovernmental bodies and governments. We did, however, directly engage with two international professional associations around our findings, and found a lot of common ground which we will continue to build on.

National advocacy

There is further to go to extend participation beyond professional NGOs like TI itself to a broader range of CBOs.

Accepted – We agree with the recommendation, although the work on illicit financial flows was almost exclusively regional and global by design, and there was no real vehicle to engage with citizens. This and the technical nature of IFFs as an issue made it very difficult to meaningfully bring the work closer to direct level of citizens. However, there is more evidence of this kind of engagement at national level in Kenya and South Africa. Corruption Watch in particular partnered with community-based organisations (CBOs) to conduct consultations with mining-affected communities. In general, as independent national entities, TI chapters differ in their strategies and vehicles for citizen engagement, but working with CBOs or with communities has become more prominent.

Partnerships

Allies strongly appreciate working with TI, but do still perceive a preference to work alone or to assume a leading role in partnering with others. It is not that TI does not deserve a leading role, but that its attitude towards those it partners with may still need some work. A broader, more multi-stakeholder approach, akin to that employed nationally, could be used.

Partially accepted – We are open to using more multi-stakeholder approaches more frequently. However, we believe that the level of engagement and partnership modes must follow the specific, contextual advocacy strategy and considerations on what would be most impactful. In some cases, it is more strategic to aim to maintain a united civil society front even if this might mean compromising

on policy positions of individual partners, while in others it might be more strategic for multiple partners to push from different entry points with their own specific messages, defined by their unique mandates and advocacy approaches. In some cases, TI is the only civil society actor advocating on a given issue.

At the global and regional levels, TI continuously partners with external stakeholders. All global advocacy initiatives undertaken as part of the REAP project involved some level of engagement with external civil society partners. Some collaborations were heavier on joint work (such as UNCAC Conference of State Parties advocacy) while others primarily involved exchanging notes with partners to align strategies (e.g. on the issue of enablers). At the regional level, we hosted joint meetings and collaborated closely with, for example, the Tax Justice Network Africa and the Civil Forum on Asset Recovery.

Community engagement

TI Kenya and Corruption Watch owe it to the communities with which they have worked to provide some form of structured, targeted follow-up support.

Accepted – The chapters both agree with the recommendation but there are constraints from the limited timeframe of the project and the need to sustainably fund these engagements. As mentioned above, the issues covered by REAP are strategic for both TI Kenya and Corruption Watch, and they will be seeking to sustain the efforts initiated under the project, provided new funding is available. This ongoing engagement is critical in the context of sustainability, as well as ensuring that community challenges continue to be prioritised.

For the work done in South Africa, which heavily involved mining-affected communities, such follow up should go beyond practical support and recommendations in the best practice guide developed by Corruption Watch, particularly given the scepticism of communities about the follow-through from NGOs. These ongoing engagements would also help Corruption Watch to formulate their next interventions in the mining sector.

In future work of this nature, TI chapters should analyse its internal and external environment realistically to determine how to reach and appropriately engage target communities.

Accepted – For similar initiatives, Corruption Watch recommends a community engagement audit to explore the biggest issues facing the communities prior to setting the deliverables. This flexibility in planning the activities would also enable alignment with communities' expressed needs.

Project design

A stage of clarifying overall strategy direction and priorities at the outset, and the expected roles and responsibilities flowing from that, is needed.

Partially accepted – This stage was included in the project design, but was delayed because of the breadth of the project scope and the lack of evidence on IFFs in Africa in the first half of the project – which we relied on to develop a strategic direction. This made it more challenging to devise a concrete advocacy plan. The internal TI Secretariat project oversight boards (see above), introduced since the start of the project, combined with clearer alignment with relevant strategic objective ambitions through the 'pivot to programmes' (also described above) is already helping to clarify

directions, roles and responsibilities to keep project implementation on track and respond when questions arise in similar situations on other projects

This project has exhibited elements of a 'pipeline' approach where advocacy and engagement depend too much on research outputs. As it is aware, TI needs to get better at scheduling the different elements of a project

Accepted – We acknowledge the challenges of coordinating, aligning and sequencing the research and advocacy phases of projects (see above) in a linear, dependent project schedule. Advocacy efforts need to be grounded in solid, robust and comprehensive research: TI's credibility and reputation as "one of the go-to organisations on dirty money" depends on this. This is especially important for new or innovative areas of work or where our analysis shows evidence and analysis gaps need to be filled before effective advocacy strategies can be clearly formulated.

Developing innovative methodologies and producing solid and comprehensive findings takes time and inherently brings some level of risk that the chosen methodology does not yield the anticipated results. At the same time, from an advocacy perspective, we have acknowledged and are actively addressing (see above) the need to become more agile to be able to produce policy relevant findings in a timely and accessible manner to inform and respond to emerging/ongoing advocacy opportunities.

We will explore in future strategies how to break down the research phase in smaller units or research pieces to produce policy relevant findings that can be used in a more flexible and agile manner throughout the project implementation.

Project management

At the least, TI should test a more genuine form of matrix management by giving project teams more status and project managers more authority.

Partially accepted – The TI secretariat's most impactful 'matrix management' approach has been the pivot to programmes influencing project selection and design in the first place, as well as the recognition that cross-team ownership and oversight through the project boards help to further support and empower project managers at appropriate levels of tolerance and decision-making responsibility. The effective functioning of project boards, and how they support and interact with project managers and vice versa, are under active continuous improvement and learning. Standardisation of wider project management processes and roles and responsibilities over the past couple of years is also guiding smoother and more consistent implementation and co-ordination for more recent projects.

Finally, the importance and role of specialist project managers has increased in visibility, recognition and understanding across the secretariat during the past couple of years. Up to 80% of the secretariat's funding is through restricted projects, and effective and impactful delivery is a shared aim and responsibility across all secretariat teams, with the project managers playing a critical central co-ordination role in bringing this about.

Final remarks

We would like to thank the team of evaluators for their insights, both in terms of highlighting what the project has achieved, and of pointing out what can be learned from this complex project. We are

glad that they recognised strong progress towards our objectives and our contribution to fighting inequalities in Africa. The learning will also be invaluable to improve the way we carry out similar initiatives. We are grateful for the financial support from the European Commission and the BHP Foundation, which allowed the TI secretariat, TI Kenya and Corruption Watch to advance strategic areas of work and make concrete impact in the fight against corruption and inequalities.