

SANCUS Final Project Evaluation – Management Response

Introduction

This management response outlines how the Transparency International Secretariat (TI-S) plans to incorporate findings of the final evaluation of the SANCUS project in future programming.

The independent evaluation took place between July-November 2023 through an initial desk review, followed by interviews conducted with TI-S' SANCUS team members, staff from the 26 implementing partners (i.e. 25 TI chapters and 1 partner CSO in the Gambia), representatives of some of TI's partner organisations, as well as representatives of the European Commission which was the donor for this project. The evaluation team also conducted two field visits in Guatemala and in Kenya, as part of which they had the opportunity to interview some of the chapters' key partners, beneficiaries, and the EU Delegations in these two countries. The evaluation exercise concluded with the evaluation workshop that was held online in November 2023, and the subsequent submission of the final evaluation report by Aleph Strategies.

The report provides insights on the SANCUS project's successful approaches and the areas that can be improved in TI's future project design and implementation. Overall, TI-S is encouraged by the findings of the evaluation, in particular the confirmation of SANCUS' high *relevance*, its good *coherence* with the strategic goals of TI and its partners, as well as the significant *impact* it had on institutions, even in difficult circumstances. We also welcome the recognition of SANCUS as a key agent for strengthening networks, actively engaging duty-bearers and citizens, and ensuring that marginalised communities have a say in decisions that affect their daily lives.

The evaluation identified strengths and weaknesses of the project design, including around new work areas and approaches that were explored through the project. Whilst the newer horizontal accountability work, for instance, was found to yield positive results, the development of digital tools generated mixed results. Although the evaluation highlighted interesting instances of regional collaborations supported through the project, the 'co-applicant model' that was piloted under the SANCUS project was deemed to not be as effective as it could have been, though no alternative model was recommended.

A key finding of the evaluation was that by allowing each participating partner to tailor activities to its own country context and needs, the project was able to respond effectively to the evolving needs of the intervention context. The recognition of the value of flexibility in project design and implementation can be found in other evaluations commissioned by TI, and strongly aligns with TI's decentralised governance model as well as the EU's localisation agenda, which supports local responses to local needs. On the other hand, some inflexibility in the grant structure set up by the donor around the allocation of resources, including the imposed cap on amounts for subgrants to implementing partners, was deemed challenging to project implementation.

As noted in the 'Limitations' section of the evaluation report, we acknowledge the constraints within which the evaluation team operated, and appreciate their efforts in particular with regards to reviewing

the significant volume of results data and engaging with the considerable number of stakeholders involved in the project. Some of the further impact achievements have also only been reported subsequent to the evaluation process being completed and will be captured in our final project report.

Access to this fully comprehensive overview of results data would likely have built a stronger case for evaluating the relevance of the theory of change and documenting the full extent of the project's impact. Indeed, the analysis of further instances of changes generated through SANCUS in multiple countries would have likely resulted in a more substantive assessment of the theory of change, which was found by the evaluation to be 'an interesting model but sometimes came short when confronted to the reality of implementation.' We note that the evaluation report itself contained little evaluative analysis of the relative merits of combining vertical and horizontal accountability approaches in the numerous countries where this did occur, which in our view would be important to fully test the validity of the project's theory of change. In our experience and considering the project's results, TI-S is satisfied that SANCUS' theory of change was appropriate, even in countries affected by political blockages and civic space constraints. Engaging public institutions in horizontal accountability initiatives was doubtless challenging in some countries. However, the case of Guatemala, among other countries, illustrates that the SANCUS theoretical framework allowed project partners operating in settings with limited civic space to prioritise demand-side, bottom-up accountability actions while actively exploring options to engage a variety of horizontal accountability actors – including at the sub-national level – and capitalising on such opportunities as they arose. In our view, this approach was often able to maximise pressure on duty bearers to enhance the accountability of public institutions.

Feedback on recommendations and TI-S Response

Overall, TI-S accepts all the recommendations (see Annex) made by the evaluation team. The recommendations for a potential second iteration of SANCUS will be considered by TI-S if such an opportunity arises, as well as in future project design and implementation for similar initiatives. Some of the recommendations (see 4.3 section of the Annex) target the donor and have already been shared with them.

TI-S follow-up on certain recommendations at the level of the organisation

Streamline the project's scope by reducing the number of participating countries

TI-S agrees that it would be appropriate to adjust the resources in a way that all implementing partners are in a position to implement projects reaching their full potential. This includes resources available to chapters, as well as resources for TI-S which plays a key role in supporting chapters and coordinating global project processes. If resources are limited, then the number of implementing partners should be carefully assessed. However, this should not be understood as reducing the number of countries covered to only select those with conducive political contexts in which both vertical and horizontal accountability approaches may be implemented without any major obstacles. Indeed, Transparency International supports CSO-led accountability advocacy even in difficult contexts, to resist democratic backsliding. In general, TI aims for a carefully considered balance to be found between depth and

breadth of the project's scope. With this in mind, TI-S has carefully thought through the selection process of partners in new projects such as the Waverley Street Foundation-funded Climate Integrity Governance project and a new EC-funded civic space consortium, taking into account factors such as the resources available, the financial absorptive capacity of chapters in relation to their overall organisational size and annual income, and the capacity of staff to undertake work in a range of thematic areas.

Reinforce the TI-S team

TI-S agrees that the TI-S team's capacity was stretched, in particular from the mid-point of the project period as the project grew to include new countries. Adding more staff time for thematic support, project management, and MEL would have resulted in increased support provided to chapters and a better capacity to organise more knowledge exchanges. The recommendation to reinforce the TI-S team has already been incorporated in new projects that include a comparable number of partner CSOs, such as the Climate Integrity Governance project, next phase of our Asia Pacific regional project and a new EC-funded civic space consortium which have allocated higher staff allocations for thematic work, project management, and MEL. We are also increasingly factoring in – especially in the case of the last two new projects – additional support efforts needed from TI-S to work with chapters co-implementing projects in national contexts of severe civic space challenges.

Streamline and strengthen the MEAL approach

TI-S agrees that despite being deemed 'comprehensive', the SANCUS indicators were too numerous, and it is advisable to reduce the number of indicators of project MEL frameworks to make the data collection and evidencing process manageable within resourcing constraints for MEL staffing. TI-S is currently working on standardising its project MEL frameworks and tools, and also exploring better alignment between our strategic roadmap and Impact Matrix-led internal indicators which support our own preferred approach to MEL on projects, to those the indicators that regular donors to TI, including the EC, commonly expects or prefers on thematic projects. These frameworks and tool will in time also be shared with chapters and enable more nuanced discussions about what levels of MEL staff time should be allocated to new projects.

Extend consultation time and involve diverse stakeholders in the inception phase

TI-S agrees with the added value of having more consultations with a variety of stakeholders, however there is a balance to be found as extending the inception phase also means that there would be a shorter implementation phase. This could be resolved by extending the overall duration of the project, which is one of the recommendations addressed to the EC (4.3.4: 'Extend project duration to enable effective advocacy implementation').

Provide more opportunities for lesson sharing among participating National Chapters

TI-S agrees that opportunities for lesson sharing are highly productive and are regularly highlighted by chapters as extremely useful sessions to learn from other chapters about what has worked and not worked so well in their interventions, and which approaches can potentially be replicated in their own country contexts. This is also a finding and recommendation of other recent project mid-term reviews and evaluations so has been taken on as a wider learning when designing new global and regional

projects. In this particular case, lessons learned were also highlighted as part of the final SANCUS Advisory Committee held at the end of the project period.

Enhance communication with EU Delegations for project sustainability

TI-S agrees that clear communications channels between EU Delegations and local project chapters should be established from the early stages of the project. TI-S noted that exchanges increased, particularly in the last year of the project, but the level of engagement varied from a country to another. TI-S is looking at collaborating more closely with the EC to develop clear guidelines and contact lists to be shared with implementing partners and EU Delegations during the inception phase of new projects.

Create National Chapter profiles

This recommendation, also highlighted in the ARBAC-19 project final evaluation by the same evaluators, refers to the value of creating a map of the capacities of each national chapter, including their expertise working on different areas, their operational experience, and their managerial capacity. In the case of SANCUS, this would help TI-S in selecting chapters who have demonstrated experience and capacities in implementing accountability actions.

TI-S reconfirms our agreement with this recommendation and will gather up-to-date information on chapters' capacities as part of our new EC-funded Action Grant for network strengthening, which will focus on building the capacities of chapters in specific areas. A new strategic objective has been added to the TI Strategy to prioritise this work stream.

Align the evaluation process with TI's Impact Matrix

Considering TI's limited budget for evaluations, it is recommended that TI-S aligns its Terms of Reference for evaluations to TI's Impact Matrix, and considers alternative approaches such as Outcome Harvesting or Contribution Analysis. TI-S agrees with this recommendation and is now already piloting new outcome harvesting-based MEL approaches and tools on other global and regional projects, such as the Climate Integrity Governance project, the next phase of our Asia Pacific regional project and new EC-funded civic space consortium.

Final Remarks

TI gratefully acknowledges the remarkable support of the European Commission as a key partner in advancing democratic accountability through the SANCUS project. The level of engagement of its representatives, including during the evaluation process, has been very much appreciated by TI-S and TI chapters. We look forward to exploring new and further opportunities to collaborate on initiatives related to democratic accountability and anti-corruption.

We also extend our thanks to the evaluation team Aleph Strategies for facilitating this important learning process for TI.

Annex: Recommendations

4.1. For SANCUS 2.0

All stakeholders with whom we spoke expressed disappointment that the project was coming to an end. While they eagerly hoped that there would be another SANCUS, a key challenge will be the loss of momentum in the interim. Considering the interest in pursuing another SANCUS, we make the following project-specific recommendations.

4.1.1 Streamline the project's scope by reducing the number of participating countries.

Currently, involving 26 countries may hinder efficient cooperation and coordination. While having a critical mass of countries was helpful to find synergies at the regional level, especially in Latin America and Sub Saharan Africa, several National Chapters found that the budget allocated to them did not fully enable them to implement activities related to all four objectives of the project. This situation was exacerbated because of the grant structure as defined by the EC, and we recognise that SANCUS TI-S team found creative solutions under a strict set of financial parameters. To achieve a more effective impact in line with the intended theory of change, it is recommended to streamline the project's scope by reducing the number of participating countries. By focusing efforts and resources on a more manageable number of countries, the project can delve deeper into contextual nuances and develop targeted strategies to bolster accountability at both levels. Another option it to adjust the resources proportionally to the number of countries, to ensure that the project can reach its full potential in all contexts.

4.1.2 Reinforce the TI-S team

The teams, both at the Secretariat and National level, reported that their human resources were stretched and subject to significant turnover. Within the Secretariat, the team was slightly more stable but had to carry out the challenging task of collating data from 26 countries, which led to delays in feedback, and without the support of a dedicated MEAL officer. To enhance project effectiveness and address specific areas of expertise, we strongly recommend hiring individuals with technical proficiency in MEAL to bolster the successful implementation of the project and the harmonisation of data across countries, as well as hiring more project management roles proportionally to the number of countries involved. In parallel, having additional resources within the

core team will enhance the project's ability to act on Horizontal and Vertical Accountability by devoting staff both to research and advocacy actions. This could be achieved with changes in the grant structure as highlighted in recommendation 4.3.1.

4.13. Streamline and strengthen the MEAL approach

While the KPIs were deemed comprehensive and could address all objectives and activities, National Chapters reported confusion regarding the number of indicators, as they did not all apply to them. To streamline the Monitoring, Evaluation, Accountability, and Learning (MEAL) framework, it is advisable to reduce the number of indicators and avoid repetition across outcomes and output indicators. A concise set of well-explained indicators will facilitate effective data collection, analysis, and project assessment. The project could consider a centralised MEL system online to facilitate reporting (on an app such as Knack) or providing more MEAL training to country teams to support their efforts. The project could also consider holding MEAL experience sharing workshops where chapters share their challenges and the solutions they found.

Additionally, not all National Chapters have access to a MEAL expert. Where possible, National Chapters should hire a MEAL specialist into the SANCUS team, to ensure robust data collection, analysis, and informed decision-making. These experts can guide the teams in utilizing appropriate indicators to track progress and evaluate outcomes accurately.

4.14. Extend consultation time and involve diverse stakeholders in the inception phase

While the project was highly relevant to various local contexts, half of the chapters report that consultation with local stakeholders was limited due to time constraints, which incurred delays at the beginning of the project. To ensure a comprehensive understanding of the project landscape and maximise stakeholder engagement, it is advisable to extend the consultation duration during the inception phase, as part of a longer project. Moreover, the inclusion of a wide array of stakeholders, such as civil society, institutions, and beneficiaries, is crucial for a more holistic and well-rounded project inception. The extended consultation period should allow for in-depth discussions, feedback collection, and the incorporation of diverse perspectives. This collaborative approach will lead to a more inclusive, contextualized, and ultimately effective project design, setting a strong foundation for successful project implementation.

4.15. Provide more opportunities for lesson sharing among participating National Chapters

The example of Guatemala and its successful Social Audit School proved that working at the grassroots level is highly effective, especially in contexts where civic space is closing. One recommendation of the Guatemala chapter was to have a platform to share the lessons they learnt on successfully engaging with grassroots organisations, a result they would like to see other chapters replicate. This is one example of a specific activity that worked well, and we recommend that National Chapters hold at least one Lesson Sharing Workshop at the end of the project, to help TI map out what types of interventions worked well in which contexts, and what could be replicated.

4.16. Enhance communication with EU Delegations for project sustainability

The EU delegations we interviewed reported that there were missed opportunities for collaboration at the national level. We recommend establishing clear and direct communication channels between EU delegations and local project chapters. Regular or annual virtual meetings, workshops, or webinars should be organized to facilitate meaningful discussions regarding project progress, updates, and strategies aligned with the goal of long-term sustainability. In addition, providing comprehensive information about the EU's specific role, contributions, and future initiatives within each country is essential to promote a stronger sense of collaboration and shared purpose among all stakeholders involved, and foster knowledge sharing.

4.2. For Transparency International

4.2.1. Create National Chapters profiles

To enable projects such as SANCUS to carefully select a smaller subset of countries where there is confidence in their capacity to effectively implement actions promoting both vertical and horizontal accountability, TI should consider creating a database listing the core attributes and capacities of each National Chapter, such as their key areas of focus, their operational experience and managerial capacity. This is in line with the recommendations we made in the ARBAC-19 evaluation, corresponding to a project which also struggled to find global synergy.

4.2.2. Align the evaluation process with TI's Impact Matrix

This evaluation, like the ARBAC-19 we carried out in 2023, was structured according to the OECD-DAC criteria. Yet, in the inception phase we realised that the ambition for this evaluation went much beyond these criteria, as the project team needed broader reflections on the overarching approach pioneered by SANCUS. Considering the limited budget TI allocates to evaluation, we recommend aligning Terms of Reference to TI's [Impact Matrix](#) and considering alternative approaches to evaluation, such as Outcome Harvesting or Contribution Analysis, which are more cost-efficient and could be incorporated within the projects' MEAL tool design.

4.3. For the EU

4.3.1. Reform the grant structure to allow a greater budget for each country

Most chapters reflected on the fact that SANCUS was an excellent project, and that more efforts should be devoted to implementation at the national level to work on accountability from several angles where possible and harness the full potential of the project. To enhance the scope, frequency, and geographical reach of project activities at both the national and regional levels, it is essential to augment the project budget allocated to each country. This would not necessarily impact the overall project envelope, as it would allow TI to choose fewer National Chapters and implement more targeted activities. Adequate funding is crucial for successful project execution, ensuring that teams have the necessary resources to effectively carry out the project's objectives. Considering that the donor has shown some flexibility regarding the allocation of budgets in the past, we encourage the EC to revise its guidelines considering the maximum amount per participating chapter.

4.3.2. Revise the digital aspect of the project for improved applicability

Given the limitations of digital access in many project intervention areas, particularly rural zones, it is imperative to revisit the digital strategy and its importance within the project, as it is currently one of the four key outcomes following the EC requirement. With greater consultation with National Chapters, TI can assess the feasibility of utilising digital tools and technologies in areas with limited internet access or lack of computers, and can consider alternative approaches, such as mobile-based solutions. The Open Knowledge Foundation partnership was a positive step in that regard, as it enabled SANCUS to provide context specific mentoring to National Chapters. In the future, what constitutes a digital tool should be further defined. The digital aspect of the project can be nested under the other overarching project objectives, tailored to accommodate the specific circumstances

of different intervention regions, ensuring inclusivity and effectiveness across diverse target populations, or pared down where it does not bring a specific added value. This will avoid a situation whereby chapters develop digital tools just to comply with the terms of the project, as reported in at least one chapter.

4.3.3. Revisit the co-applicant model

While National Chapters praised the co-applicant chapter approach and its potential to bring governance closer to the regional level, the lack of clarity regarding the role of co-applicant chapters led to National Chapters reporting in parallel with the co-applicants, the TI-S SANCUS team and the TI- S regional advisors, which was not very efficient. Enhancing cooperation between National Chapters and co-applicants necessitates a clear understanding of the role and responsibilities of the Co-applicant Chapters. It is recommended to provide detailed documentation and conduct comprehensive training sessions for the National Chapters that elaborate on the purpose, functions, and collaborative expectations of the co-applicant chapters. Clarity in roles will facilitate seamless cooperation and efficient coordination between National Chapters and co-applicants. In particular, co-applicants could receive funds specifically devoted to delivering training on the Vertical and Horizontal Accountability research methodologies at the regional level, to improve the relevance of training and avoid information overload. If co-applicants continue to have a hybrid role as national implementers and regional convenors, they could be counted as “local actors” whose spending contributes to the 60% target for third parties, thereby easing the budget constraints deriving from the current grant structure.

4.3.4. Extend project duration to enable effective advocacy implementation

To optimize the project's impact and ensure a successful transition from research to advocacy, we strongly recommend extending the project duration to five years. Currently, the time constraints at the project's conclusion hinder the seamless progression into the advocacy phase despite having acquired valuable research data and practical impacts. By extending the project timeline, ample time can be allocated for the effective implementation of the advocacy phase, allowing for thorough planning, strategizing, and executing advocacy initiatives based on the research findings, ensuring a more impactful advocacy campaign. Moreover, a longer project duration allows for broader dissemination of research results, facilitating the engagement of stakeholders and the public in the

advocacy efforts. This inclusive approach will strengthen the advocacy message and garner wider support for the desired change or reforms, which take time to implement considering the political processes at play.