



Evaluation of the Strengthening Accountability Networks among Civil Society (SANCUS) project

Final Report

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Acronyms

AC	Acción Ciudadana (Guatemala National Chapter)
ACA	Anti-Corruption Agencies
ALAC	Transparency International’s Advocacy and Legal Advice Centres
Aleph	Aleph Strategies
APNAC	African Parliamentarians Network Against Corruption
CSOs	Civil Society Organisations
EIDHR	European Instrument for Democracy and Human Rights
KAYPAT	Kawangware Youth Paralegal Trust (Kenya)
KIIs	Key Informant Interviews
KNASVIT	Kenya National Alliance of Street Vendors and Informal Traders
IBP	International Budget Partnership
IDEA	International Institute for Democracy and Electoral Assistance
INTER PARES	Parliaments in Partnership – EU Global Project to Strengthen the Capacity of Parliaments
INTOSAI	International Organization of Supreme Audit Institutions
MEAL	Monitoring, Evaluation, Accountability and Learning
OAG	Office of the Auditor General (Kenya)
OCCRP	Organized Crime and Corruption Reporting Project
RTI	Right to Information
SANCUS	Strengthening Accountability Networks among Civil Society
TI	Transparency International



Executive summary

The **Strengthening Accountability Networks among Civil Society** (SANCUS) project was conceived with a **comprehensive approach**, strategically addressing corruption across the mutually reinforcing domains of vertical accountability, horizontal accountability and strengthened networks. Recognising the intricate nature of this program and its global implementation by 25 National Chapters of the Transparency International (TI) network and one additional participating CSO in Gambia, our evaluation and methodology were crafted to provide a broad view on the key achievements of SANCUS and the challenges encountered. This report endeavours to provide recommendations to enhance the effectiveness and coherence of TI's future projects in the accountability sphere.

The SANCUS project was an ambitious attempt to target specific accountability gaps at country level, and has been overall successful in engaging with stakeholders at the national level to promote civil society's ability to combat corruption. SANCUS operates at a scale where change is slow and incremental, especially with regards to legal processes and policy, and we find evidence that the project has promoted greater horizontal and vertical accountability, as well as fostered civic networks. The project was flexible, allowing for each participating National Chapter to choose activities adapted to its context. While global tools were well-received and the networking among chapters was appreciated, finding elements that would be common to all the 26 country projects was more difficult due to time, budget and external constraints (such as COVID-19 or adverse political contexts). To find a more cohesive global approach, SANCUS needs to target a subset of activities and deploy those in a smaller number of National Chapters where these streams of activities would be most relevant.

Key findings

The evaluation was based on five OECD-DAC evaluation criteria: relevance, coherence, effectiveness, efficiency, and sustainability. Overall, we find that:

- This project is highly **relevant** but is built upon overly ambitious goals given the available resources and the number of National Chapter that ended up being involved due to the grant structure. The flexibility of SANCUS's approach was praised, as National Chapters could focus on activities that were most aligned with their national contexts. We find strong evidence that the project was able to respond positively to the evolving needs of the intervention context, demonstrating a good capacity to reflect, learn and adapt through mechanisms such as knowledge sharing within peer-to-peer networks and the learning activities of mastermind sessions, spotlight sessions, and webinars.



- The project demonstrates good **coherence**, seamlessly aligning with both internal TI strategies and those of stakeholders on the ground as well as the European Union. Coherence at the national level could have been improved by allowing for greater consultation with local stakeholders, local communities and CSOs, outside the National Chapters, at the proposal stage.
- There is a wealth of data suggesting that the project was **effective** in contributing to achieve project outcomes, both regarding the strengthening of networks and the vertical accountability component, and regarding the horizontal accountability component. The chapters that were able to implement both reflected on the usefulness of the SANCUS approach.
- While communication and support were praised, weaknesses have been identified in the program's resource **efficiency**: the resources available for this project were constrained by the grant structure, which means that National Chapters had to reduce the scope of activities. This limited their capacity to fully implement activities related to all four core project outputs (horizontal and vertical accountability, digital tools, strengthening networks). Besides, communication could have been strengthened by providing more clarity to the National Chapters on the role of co-applicant chapters in promoting regional activities, so that National Chapters could fully take advantage of the regional governance model. (See Section 4.1.5).
- SANCUS has had a significant **impact** on institutions, even in difficult circumstances. Citizens and right holders have been actively involved, and in contexts where the project could operate at the grassroots and CSO level, it could promote the agency of marginalised communities. The project has also contributed to strengthening national networks, though the impact is weaker at the regional level.
- The project's **sustainability** is satisfactory, given the substantial number of stakeholders who have participated, contributed, and adopted the tools implemented through this project. National Chapters have strengthened their knowledge and capacity regarding anti-corruption issues at the vertical and horizontal levels, and the tools are replicable both internally and externally.

Key lessons

While the project draws upon political science research highlighting the interconnected nature of horizontal and vertical accountability in combating corruption, **the project's theoretical framework does not easily translate into practical implementation**. There is a disparity between the total number of project-involved chapters (26) and the actual number of chapters that have implemented actions



pertaining to both horizontal and vertical accountability (10, with another 7 managing to address both areas in a more limited way). While in some cases this was due to political blockages, and National Chapters resolved this by working on the other lever, in some other cases this was due to a lack of resources. This discrepancy emphasises that the successful execution of this strategy relies on a judicious selection of a limited number of chapters, which can have more resources to focus on several areas. These selected chapters must operate within a suitable context and possess the necessary capacity to effectively develop and integrate both horizontal and vertical accountability axes in the field. In countries where both vertical and horizontal approaches could be implemented, such as Kenya, National Chapters explained that they mutually reinforced each other.

SANCUS was underpinned by a **flexible, problem-solving approach** whereby each of the 26 National Chapters could **choose within a wide panel of activities** that corresponded to its political context. This aspect was praised by National Chapters but also involved a trade-off between overall project cohesion and responsiveness to local needs. The global tools generated by the project, as well as the network building aspect, were key attempts to implement a systematic approach, and were praised by the National Chapters. However, the project could have been stronger by focusing on fewer National Chapters with greater synergies, and with the resources to work on all aspects of accountability and engage regionally.

The co-applicant model was introduced to enhance the organisation of activities at the regional level in projects involving numerous chapters. The SANCUS project pioneered the adoption of this approach within Transparency International, and the model was reasonably successful in Sub Saharan Africa and Latin America, enabling shared actions to take place. However, as this was the first time Transparency International has employed this approach, there were a number of unforeseen challenges, including a lack of comprehension of the model which subsequently hindered collaboration between National Chapters. Specifically, National Chapters were unclear about the roles and responsibilities of co-applicant chapters, making it difficult for them to fully coordinate regional efforts and communication. Although the model aspired to facilitate joint regional actions, bridging the gap between national and regional needs was challenging, given varying socio-political contexts of different chapters.

Recommendations

All stakeholders we engaged in this evaluation 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 for a future SANCUS project:

- **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 vertical and horizontal levels. Another option is to adjust the resources proportionally to the number of countries, to ensure that the project can reach its full potential in all contexts.
- **Reinforce the TI-S team.** Considering the number of National Chapters involved, we recommend hiring a specific MEAL officer for this project and additional thematic experts who can strengthen the existing team. Due to the large number of chapters, the workload is very heavy and can therefore lead to delays in providing feedback. Hiring more project management roles proportionally to the number of countries will enhance the project's ability to act on Horizontal and Vertical Accountability by devoting staff both to research and advocacy actions.
- **Streamline and strengthen the MEAL approach.** While the indicators were adequate, the number of indicators was deemed overwhelming. We recommend reducing the number of indicators and investing in a centralised MEL platform to facilitate reporting.
- **Extend consultation time and involve diverse stakeholders in the inception phase.** Several chapters had the perception that there was little time to engage with relevant CSOs, and explained they would have benefited from greater consultation. A longer consultation phase with local stakeholders would also allow National Chapters to come up with a more cohesive strategy tackling both horizontal and vertical accountability.
- **Provide more opportunities for lesson sharing among participating National Chapters.** Networking with local communities, as seen in Morocco or Guatemala, was a great strength of the project. Skill sharing and learning from these experiences needs to be encouraged at the local, regional and global levels, and the National Chapters that were particularly involved with local communities could be highlighted more through further Mastermind and Spotlight sessions. In addition, a Lesson Sharing Workshop should be held at the end of the project, to identify what activities worked particularly well, and could be replicated in other contexts.

We also make the following recommendations to Transparency International more broadly:

- **Create National Chapter profiles.** This would be a 'status map' of National Chapters, containing information about their key areas of focus, their operational experience and managerial



capacity. This would enable TI to select National Chapters that have greater potential for conjoined actions and activities, and facilitate synergies across the project.

- **Align the evaluation process with TI's Impact Matrix.** Considering the appetite for evaluations that go beyond the OECD-DAC criteria and can meaningfully speak to TI's programming, we recommend alternative approaches for evaluation that are more tailored to TI's needs and its own Impact framework.

Finally, we recommend that the donor consider the following:

- **Reform the grant structure to allow a greater budget for each country.** Resources were a key challenge during this project, both at the global and country level. We recommend allowing TI to choose fewer chapters but allocate a greater budget to each participating chapter.
- **Revisit the co-applicant model.** While this approach proposed by the donor was promising, it created parallel, often confusing, lines of reporting. The project needs to be much clearer on what is expected of co-applicant chapters and how they can support regional efforts, and offer detailed information to the National Chapters during the onboarding stage explaining how the regional co-applicants will support them.
- **Revise the digital aspect of the project for improved applicability.** Several National Chapters struggled to work on digital tools, which was a direct requirement of the donor. The project would have been more effective by including the digital approach as an optional component of its three main objectives, and adapt it to each context.
- **Extend project duration to enable effective advocacy implementation.** We commend SANCUS on its ambition, but as the project operates in a sphere where change is slow and incremental, and involves dealing with busy state institutions, a longer timeframe would help the project achieve greater impact, especially with regards to advocacy.
- **Enhance communication between national EU Delegations and National Chapters for project sustainability.** We recommend the EU delegations to be more involved through regular meetings, webinars or workshops to ensure greater cohesion and sustainability within each country context.



1. Introduction

1.1. Purpose and Scope

Aleph Strategies (Aleph) has been commissioned by Transparency International (TI) to carry out an evaluation of the Strengthening Accountability Networks among Civil Society (SANCUS) project. The purpose of this report is to **present our analyses and conclusions** regarding the achievement of the SANCUS project's objectives. It also provides an **overall assessment** of the project's achievements and performance in the 26 target countries, based in particular on two case studies conducted in both Kenya and Guatemala, and makes **specific recommendations** for improving its activities.

1.2. Background and Objectives

The TI SANCUS project strives to enhance the democratic accountability of public institutions, empower civil society organisations (CSOs) to call for systemic change to address accountability and anti-corruption deficiencies, and bolster democratic accountability through a dual approach. This involved 21 national project teams implementing activities to strengthen both vertical and horizontal accountability. In 2022, five countries were added to utilise one of the two assessment tools developed during the project's first year. The project aims for three core outcomes:

- i) **Network Building:** Mobilising CSOs and rights holders more effectively to demand greater accountability and integrity through heightened visibility, strategic advocacy, and extensive networks;
- ii) **Vertical Accountability:** Engaging CSOs in meaningful consultations with duty bearers, redress mechanisms, and monitoring and scrutiny of their responsiveness throughout policy and budget cycles;
- iii) **Horizontal Accountability:** Advocating strongly for enhanced parliamentary oversight and more robust democratic accountability institutions and mechanisms, rooted in systematic monitoring and public reporting on their performance, using digital technologies.

The project operates in 26 countries and has been active for 36 months. Countries where the SANCUS project operates display common accountability and anti-corruption deficiencies, including lack of integrity in public institutions, weak rule of law, feeble checks and balances, diminishing civic space, and limited public participation in decision-making. Despite these shared challenges, the project encompasses a diverse range of activities tailored to each country's unique contextual and operational circumstances.

Figure 1. The 26 countries of SANCUS implementation. Source: TI website.



As the project nears its conclusion, this evaluation sought to provide a comprehensive assessment of performance to inform potential future projects of a similar nature and guide the Movement's overall approaches to delivery. The evaluation had three primary objectives:

- i) First Objective: **Provide a systematic and external assessment of the project's achievements** in terms of objectives, outcomes, and intended impacts as specified in the project;
- ii) Second Objective: **Identify weaknesses and strengths in the project's strategy design and implementation** concerning the achievement and sustainability of expected results, as well as driving innovation and learning across the network;
- iii) Third Objective: **Document lessons learned and best practices to develop clear, forward-looking, actionable recommendations** guiding T-S, National Chapters, and stakeholders in devising strategies for future related work at national, regional, and global levels.

1.3. Methodological note

During the evaluation, we did not limit our analysis to merely assessing the achievement of result framework indicators, even though these indicators formed a crucial foundation for our evaluation. We conducted a comprehensive examination, going beyond the surface to critically assess both the successes and shortcomings of the project's methods and impacts. True to the original proposal for this evaluation, our methodology revolved around the Aleph Evaluation Index. The Index (see Appendix 5.1



for a fuller explanation of its mechanics) was effectively incorporated into the evaluation process, and we sought and welcomed your team's valuable input to refine our approach.

Data collection took place both remotely and face-to-face, in Kenya and Guatemala, over a period of two months. Our remote data collection methods included 59 qualitative interviews, two Focus Group Discussions with the 4 co-applicant chapters (the list of which can be found in Appendix 4.3), and an in-depth review of relevant documents (the list of documents consulted is available in Appendix 2).

1.4. Limitations

Throughout the evaluation process, a significant volume of high-quality qualitative data was gathered and presented. However, several limitations were encountered. Firstly, the sheer quantity of information was considerable due to the involvement of numerous chapters in the project. Consequently, we focused on providing an overview of the key issues facing the project rather than studying each country in depth.

Moreover, the project involved a large number of partners, some of whom we were unable to interview. In particular, civil society organisations and external partners associated with many National Chapters were beyond the scope of our interviews due to the scale of participation. Additionally, logistical challenges presented constraints, restricting the number of interviews possible given the magnitude of individuals involved in the project. Consequently, we conducted in-depth case studies in Kenya and Guatemala, offering valuable insights through numerous partner interviews.

Overall, data was readily available, and the TI Secretariat were highly responsive in providing documents.

The following report presents the key findings generated by our analysis, followed by recommendations.



2. Key findings

2.1. Relevance

Overall, SANCUS was **highly relevant** to the needs of chapters nationally and to global anti-corruption initiatives. It offered participating chapters a wide array of possible activities addressing horizontal and vertical accountability, which they could select from depending on their needs. However, the sheer scope of the project's Theory of Change was ambitious, and not all chapters managed to test the complementarity of the project's three-pronged approach in practice.

2.1.1. Validity of objectives

2.1.1.1. *Relevance to the context*

The SANCUS project is thoughtfully designed to cater to the requirements of varying intervention contexts and is relevant to the countries it operates in, as well as globally.

From the design stage, the various intervention contexts and needs were assessed alongside the National Chapters according to metrics concerning democratic stability and the level of freedom and corruption in the intervention countries, as seen in the second year's activity report and the project handbook. The rationale surrounding this project also considered its capacity to bring about change, by striving to select countries in which civil society already has sufficient room for manoeuvre to intervene on corruption-related issues.

SANCUS was designed specifically to allow National Chapters to define their priorities within the overarching project framework. Country contexts, challenges, and scale were carefully considered with a specific theme, objective, and activities aimed at meeting the objective. The National Chapters praised the flexibility of the SANCUS project: as it broached topics and issues that were wide ranging, and it was easy to adapt its themes to contextually relevant problems. Chapters could also choose streams of work within the ToC that were more relevant to their own context (Bosnia Herzegovina) or integrate their own into national projects (INTOSAI, or a Score on public Reform by TI Lebanon). For example, in Peru, the main objective is to improve the skills of civil society and enable conditions regarding transparency and accountability around the participatory budget processes at subnational levels in two regions, whereas in Lebanon, the main objective is to improve the responsiveness of duty bearers by pushing for reform in the energy and social sectors, as well as encouraging greater participation in budgetary processes. These two objectives are vastly different but still fit within the context of the overall goal of



the SANCUS project. This was corroborated by our interviews with the 26 chapters, who explained how their own stream of activities fit within the overarching project objectives.

We find strong evidence that the project was able to respond positively to the evolving needs of the intervention context, demonstrating a good capacity to reflect, learn and adapt through mechanisms such as knowledge sharing within peer-to-peer networks and the learning activities of mastermind sessions¹, spotlight sessions², and webinars. In many cases, the project has had to be adapted to local difficulties and challenges linked to the socio-political issues at play, and to the level of responsiveness of governments in particular, as reported by the Lebanon, Cameroon and Panama chapters. For example, according to Palestine's 2023 Mid-Year report, after the release of the CSO AMAN's annual corruption report, there was a legal action initiated against them by the Presidential Bureau. AMAN was able to continue to focus on structural problems of corruption despite this with the support of TI, the peer-to-peer networks, and having measures in place to overcome this circumstance. **It was encouraging to see that the project management team employed a good reporting template to facilitate problem-oriented project design at country level**, requiring a specific link between project activities and contextual needs. Additionally, National Chapters were requested to highlight lessons learned that can be shared with other country chapters and the overall project. However, in practice, this was not always the case, and some chapters have reported that their efforts were not always widely disseminated and reflected upon at the global level. Indeed, the lower number of activities at the regional level and the difficulty of coordinating communication between the various Chapters made it more difficult to disseminate each Chapter's achievements at the global level, even though some opportunities were provided with the Spotlight sessions.

2.1.1.2. Stakeholder consultation

SANCUS is to be commended for consulting widely with relevant stakeholders at the overarching project level, both within and outside the organisation, in the development and design of the project. This means that the project was highly relevant both to national priorities and to contribute to the evidence base for conversations around accountability worldwide. **However, at country level, National Chapters were not systematically able to consult with relevant external CSOs in country** This was due

¹ Mastermind sessions focused on a specific idea or challenge in greater depth, with participants including National Chapters and stakeholders from relevant external organisations such as the International Budget Partnership.

² Spotlight sessions showcased the experience of specific National Chapters to discuss lessons learnt and best practices.



to the short application period: within a three-year project, trade-offs were required in how to allocate the time between project design and implementation.

Regarding internal consultation, the extent to which National Chapters were involved in the design of the overall global project scope and activities varies. Staff from some of the National Chapters were involved in the design of the project through consultation on the activities to be implemented, with the aim of building a problem-oriented approach. For example, in TI Guatemala (Acción Ciudadana), the ALAC representative was involved in the design of SANCUS at the global level. However, several other chapters have reported that they were not involved in the design of the global project itself, mainly because the confirmation on which chapters would participate came in the third month of the project.

At the country level, project staff were able to design how SANCUS would be implemented in country and were able to apply with significant flexibility, which they identified as a key strength of the project. National Chapters applied to SANCUS following an application call - some were approached by co-applicants, as in the case of Colombia which was approached by Kenya. They designed proposals based on their own priorities, which is why the project ended with very different national actions, fitting within a national action planning template. The Parliamentary Oversight Assessment and the Public Participation in Budgetary Processes toolkits were part of a suite of options proposed in consultation with the different chapters, and elected as the most relevant.

With regards to external consultation, external stakeholders were engaged during the design of the global workplan and to a more limited extent for the design of country workplans.

External stakeholders within the development sector were consulted during the design of the global project, as early as the proposal stage. Contact with INTER-PARES, another EIDHR funding project was established in the design phase as they also work on the issue of strengthening the capacity of parliaments globally. Further, the Project Proposal identifies key stakeholder groups and their role within the project, which are identified as investigative media and global and regional bodies. These stakeholders were identified after an initial consultation was carried out across the TI Network that identified the importance of deepening a collaboration between these two stakeholders.

At the country scale, most National Chapters struggled to reach out to relevant external stakeholders at the design stage due to the short time available to develop a proposal. Out of 26 chapters, only 12



report a high or good level of consultation with national stakeholders, and 5 report no consultation. In some cases, the consultation process was limited, as exemplified by Honduras: an external consultant designed the project, which led to delays in implementation as some of the planned activities were not suitable for the context. Some National Chapters were more successful, as reported by TI Armenia, which worked in close contact with field experts and relevant CSOs. Overall, the National Chapters would have appreciated longer consultations period with stakeholders in the field, and in particular the CSOs; however, considering the short duration of the project, there was a trade-off in the amount of time that could be allocated to project design vs implementation.

2.1.1.3. *Clarity of objectives*

The SANCUS project has a clear set of objectives articulated across core project documents including the Project Handbook, MEAL Plan, and National Chapter level documents: however, in practice, the National Chapters found the objectives ambitious considering the timeframe of the project and unforeseen contextual difficulties (COVID-19, evolving political situations).

The objectives are defined by vertical and horizontal accountability to approach democratic accountability from all sides. The three outcomes are linked to four specific outputs with national workplans developed for each National Chapter that addresses the specific theme, political context, and strengths of the chapter, making the objectives feasible on a country and overall Project level. The project operates in a wide variety of contexts, so the 26 National Chapters have adopted specific aspects of the project (horizontal or vertical accountability stream, for example) in addition to the network building stream of activities. In the last year of activity, they have also been able to adopt the tools offered by SANCUS, or integrate their own tools into national projects (Cameroon, Lebanon).

In many cases (Lebanon, Cameroon, Panama), the **objectives of the project had to be adapted to local difficulties and challenges linked to the socio-political issues at play**, and to the level of responsiveness of governments. Some National Chapters, such as Guatemala, report that the **objectives of the project were very ambitious in practice**, and that they had to review their expectations of what objectives could realistically be achieved. Thankfully, the TI-S team was responsive in calibrating the objectives to ensure that National Chapters could work with realistic targets. Yet, because of the difficulty of working in a sector where National Chapters have a limited sphere of influence, and various practical constraints, both linked to COVID-19 and the political situation, the timeframe of the project was deemed very short. Several chapters have reported that time constraints at the project's conclusion hindered the



seamless progression into the advocacy phase, despite having acquired valuable research data and practical impacts. This adds to the constraints noted at the project design stage, and the need for more time to design national level activities. By extending the project timeline, ample time can be allocated for the effective implementation of the advocacy phase.

2.1.2. Structural rationale

The logic underpinning the SANCUS project, as articulated in its Theory of Change, was backed by research and clearly articulated, but led to a very ambitious project whose different components could be hard to fulfil in practice.

2.1.2.1. Theory of Change

The SANCUS project's theory of change is clear and coherent, with a clear link between activities, outputs and outcomes. It has also been able to evolve and be readapted throughout the project, according to the TI Secretariat, although the National Chapters have not engaged much with the adaptation of the ToC.

The digital tools output (4) was perceived as extraneous, and could have been integrated more smoothly within Outputs 1, 2 and 3, to simplify communication and reporting. Indeed, the digital tools output supports the 3 outcomes (Network, Horizontal, Vertical), and could be perceived as a means to an end. While the integration of digital tools was an EU priority, in practice, they were not suitable in all contexts and several chapters reported working on them to comply. Some chapters have managed to fully integrate this output into their actions by developing solid tools, such as TI-Brazil, and direct efforts have been made by TI-S to help National Chapters adopt digital tools useful to the work of the ALACs (Salesforce and GlobaLeaks), as well as by providing mentorship through the Open Knowledge Foundation: yet, overall National Chapters found it harder to comply with this output. **By integrating them directly within Outputs 1, 2 and 3 as possible instruments, the Theory of Change could have been clearer and easier to translate into a set of complementary activities.** Indeed, some National Chapters worked on digital tools as an additional activity separately to their main activities (e.g. Guatemala). Had this component been serving one of the core outputs, it might have been more seamlessly integrated or scrapped to preserve resources. Some chapters also capitalised on existing tools and/or providing support to partner organisations, which worked well and could have been smoothly integrated into other outputs.



To the credit both of TI and the EIDHR, SANCUS was permitted flexibility to modify the central logical framework over the course of the project period. This is good practice, as it enables learning and adaptation, and avoids constraining programmes with unrealistic targets. From experience on other programmes, this level of flexibility is not always granted, and is therefore worthy of note within this analysis. This is demonstrated in the Y1 Annual Report where a summary of changes related to the indicators is described with a justification for the change. Certain indicators were combined, replaced, or removed to further refine the ToC to ensure coherence between activities, outputs, outcomes, and goals. For example, SO.i1 (degree of increased accountability of duty bearers in SANCUS countries) was replaced because similar information will be gathered as part of the impact indicator with a more specific focus on a five-point scale. No further changes were made the logical framework in the following years, indicating that the modifications were generally deemed adequate. Nevertheless, a small number of National Chapters reported to us that they found the changes confusing, requesting that such changes in future are communicated more clearly.

2.1.2.2. Relevance of KPIs to the Theory of Change

The KPIs are clearly defined and directly linked to the Theory of Change. They correspond to Objectives which are relevant to project expectations.

The KPIs are clearly aligned with the theory of change outlined in the MEAL Plan through an elaborated logistical framework that identifies the intermediate outcomes (IOc1 - IOc3) which are linked to an identified work package that has activities with clearly defined indicators. KPIs were identified in the Project Handbook and segmented by the Baseline at the start of the project with targets being increased by year. SANCUS countries are additionally required to report on their progress toward the KPIs identified in the MEAL plan that directly correlate it the theory of change in the mid-year and annual reports. Despite the varying thematic focus of the in-country projects, all SANCUS chapters adhere to the same KPIs that are aligned with the theory of change and are required to report on progress towards them. When an indicator did not apply to their activities, they left it blank, which could sometimes generate confusion.

The indicators are extensive, enabling us to analyse the project, its successes and shortcomings in their entirety, but that comes with a practical cost. The KPI tools of the project were considered confusing by some of the stakeholders (EU delegation): there was some repetition between outcome and output indicators, for example. Several interviewees, including chapters and the EC, also mentioned that while



the KPIs leave relatively few gaps in the representation of the project's achievements, qualitative indicators might have been more illustrative.

2.2. Coherence

2.2.1. Internal coherence

SANCUS demonstrates good internal coherence, as it complements TI's strategy and other existing projects both at the global and chapter levels. It is also in alignment with EU strategies in the anticorruption field.

2.2.1.1. *Coherence within the TI movement at the global and national levels*

The SANCUS project is strongly aligned with several objectives of TI's 2021-2030 strategy. It contributes to securing integrity in politics, pursuing enforcement and justice, and expanding civic space for accountability through the three pillars of its theory of change. By focusing on both vertical and horizontal accountability and emphasizing the sharing of expertise and strengthening civil society at the national and international levels, the project targets oversight institutions such as parliaments and the judiciary, as well as governments. The project also draws on the experience gained from TI's ALACs (Advocacy and Legal Advice Centres) network, particularly with regard to the role of civil society in the fight against corruption and corruption prevention.

The SANCUS project was coherent within each country of intervention. It was linked to the actions already undertaken by the Chapters, the socio-political context, and the resources available. Some Chapters focussed more on horizontal outreach, others on vertical outreach. SANCUS met the needs of National Chapters through a problem-oriented approach. For example, Colombia built on its work on collective action, and citizen participation in the public sector. Brazil built on ongoing work around indexing and monitoring accountability at the state level (27 states in Brazil), which they had worked on in several other TI projects including ARBAC-19. TI Morocco focused on CSO engagement and training at the local level, focusing on public budgeting advocacy. **All National Chapters we spoke with explained that SANCUS aligned well with other TI projects they had carried out at the national level.** To cite but a few examples, Parliamentary Oversight had become a key aspect of TI Cambodia's strategy from 2023 to 2026. TI Zimbabwe had already started working on accountability committees for budgeting for six years before the implementation of SANCUS, which complemented existing initiatives well.



2.2.1.2. Coherence with the donor's strategy

The SANCUS project strongly aligns with the EU globally, but less systematically at the country level. Indeed, the project corresponds to the EU priorities in terms of corruption prevention, and while SANCUS complements the EU's work at country level, there could have been more systematic involvement of the national EU delegations. At the global level, the new European Union strategy on anti-corruption, adopted in May 2023, aims to contribute to a better understanding and knowledge of corruption while ensuring that EU Member States adopt more effective laws to combat these practices. This includes rules on open access to information in the public interest, the disclosure and verification of assets of public officials, and regulations governing the interaction between the private and public sectors. The SANCUS project aligns with this strategy by assisting in the development of best practices and implementing advocacy campaigns on these issues worldwide.

At the country level, each National Chapter was able to pursue lines of action that were coherent with the EU's strategy, but an opportunity was missed to do more actions in common. For example, a video produced by SANCUS on the monitoring of courts in Bosnia could have been disseminated to further partners and key stakeholders by the local EU delegation had they been aware of it and onboard with the project. This lack of synergy is perceived as problematic, as SANCUS could have had greater alignment with the EC's actions at the national level. In Guatemala for example, the EU delegations were not involved much in the project, and there is a degree of overlap with another TI project funded by the EU, with which the delegation is more familiar. This can be explained by the fact that although the EU's global priorities were taken into account during the project's inception, and despite TI-S effort to engage with EU delegations, the extent to which SANCUS linked with the EU delegations at country-level was not systematic (it happened in Kenya, but not Guatemala, for example).

2.2.2. External coherence

SANCUS exhibits good external coherence and is aligned with the international development agenda as well as with other initiatives at country-level. However, coherence could have been improved by allowing more time for engagement with CSOs at the inception phase.

As the National Chapters could tailor the SANCUS project to their needs, it complements other CSO initiatives in the same field at country level and fills significant gaps. This was perceived as a key strength of the project by all National Chapters we interviewed. For example, within the framework of TI Kenya, the organisation's strong network at local, national and regional level enabled it to implement actions



in line with those carried out by the project's external stakeholders. However, it was pointed out that a longer inception phase would have enabled them to further improve this synergy. In fact, it was by drawing on activities carried out prior to the SANCUS project, as well as their knowledge of these organisations and their actions, that TI Kenya was able to integrate their views into the project design process despite the lack of time to extensively consult local CSOs at that stage.

TI SANCUS also aligned with government bodies and their fight against corruption, except of course in contexts of democratic decline, where the government was actively undermining the actions of the National Chapter. This was the case in specific contexts, where the restrictions of civic space made the actions of the National Chapters at odds with the direction taken by the government, such as in Jordan, or Guatemala. **Where a relationship was possible, the key limitation was reaching out to duty bearers and ensuring a sustained engagement with them:** TI-S acknowledged this limitation and published a resource brief documenting key lessons and recommendations. In most countries, however, this took longer than anticipated, even when there were pre-existing networks with oversight bodies (Jamaica). Although direct contact with parliamentarians was not easy, TI Kenya succeeded in working with the Office of the Auditor General to publish a Citizen-Centred Audit (CAA). This independent body was established under Article 229 of the Constitution of Kenya to audit government agencies and report on their management of allocated funds. By incorporating horizontal accountability, this project is perfectly in line with the OAG's missions and action.

The project also aligned with the international development agenda, and actively contributed to Sustainable Development Goal 16 by promoting peace and justice through the implementation of more effective institutions. In theory, and according to the project handbook, SANCUS participates in SDG 16.7 ("Ensuring responsive, inclusive, participatory and representative decision-making at all levels") and 16.7.2 ("Developing effective, accountable and transparent institutions at all levels") in the countries of implementation. Although progress towards SDGs is monitored by states themselves, the SANCUS project actively contributes through fostering representative decision-making. An online platform also tracks SDG 16 developments in the various countries in which TI operates, but does not provide specific information on the improvements produced by the SANCUS project (Y2 Report). In addressing the issue of accountability and anti-corruption at both vertical and horizontal levels, the project focuses on representative institutions, with a particular role for citizens.



2.2.3. Structural coherence

SANCUS's approach relied on a suite of tools, shared among the participating chapters based on need, which was effective to guarantee strong structural coherence. However, the project was weaker in terms of selecting countries that could successfully thrive under the co-applicant model (a wider analysis of this model is available in the Discussion section). The difficulties with the selection of countries emerged mainly because of the restrictions within the grant structure which resulted in a high number of participating chapters, which was harder to manage. In turn, the co-applicant model was an interesting initiative, but was not sufficiently clear and did not harness its full potential (see Discussion).

2.2.3.1. Tools and methodologies

Overall, the SANCUS project had a flexible approach to implementation based on a standardised set of activities and tools, from which National Chapters could pick and choose based on their needs, and which they reported as useful. Information was shared on a Microsoft teams platform, and support was available to help with the reporting and management tools and the running of the project in general, as well as with the implementation of the research tools. According to the end of project survey, 13 chapters deemed the research materials as excellent, 8 as very good and 2 as good. In response to chapter requests, TI S's Anti-Corruption Helpdesk provided them with papers and briefs helping them with implementation, with a total of 41 research outputs by mid-2023. Of the 26 participating chapters, 15 rated the support they received from TI-S as excellent and 10 as good. The research produced by TI has been used and made available to chapters supported by workshops, as in the case of Lebanon, and Chapters reported that their knowledge on specific corruption issues increased.

The tools offered by TI-S to National Chapters were seen as useful, and were employed as part of this project, except in cases where some chapters already had similar, functional tools. The workshops and training courses offered to learn how to use these tools were also appreciated by the members of the chapters involved in this project. In the end of project survey, 12 chapters emphasised that the skills developed with SANCUS have enabled them to "significantly" improve their capabilities in the realm of policy and budgetary processes, and 8 answered that it did so "very significantly". Regarding their ability to monitor oversight assessment, SANCUS "very significantly" improved the capacity of 7 chapters; and "significantly" for 11 of them. However, the tools specifically focused on the SANCUS project's digital axis were more difficult to adopt given the limited access to digital technology in certain areas, for example in the Maldives.



The two global tools (assessment tool on parliamentary oversight and assessment tool on public participation in budgeting processes) were considered useful and informative but very time consuming, as they were conducted on the basis of chapters' interest, in addition to their busy portfolio of activities. Some of the information being hard to obtain, due to MPs' unwillingness to engage, as reported by several National Chapters including Cambodia and Jamaica. However, the chapters who carried them out found them rigorous and innovative. According to the Horizontal lead at TI-S, and as corroborated by KIIs, the parliamentary oversight tool (Horizontal accountability) was completed by about 10 chapters. For example, TI Colombia used it as a diagnosis tool to see how the legislative apparatus works. For TI Cambodia, the parliament oversight assessment tool came at the right time as this was a key focus of their ongoing strategy. While some of the information on practice and impact was harder to source due to the unavailability of public information and the challenges engaging with MPs, the National Chapter focused on the legal framework and regards the tool as filling a key gap. The public participation in budgeting processes assessment tool (vertical accountability) was also deemed very useful, and implemented by approximately 10 chapters based on the KIIs we conducted.

Other tools were developed by the chapters themselves. Examples include a state-level transparency index in Brazil, a whistleblower protection profiling study in Colombia which was used as a background literature review (reference document) for the bill on whistleblowers in Colombia, a digital tool used at the local government level, for communities and rights holders in Cameroon, and a tool based on the horizontal tool developed by TI Indonesia to track supreme court members (integrity, perspective on human rights, GESI mainstreaming...), now used by CSOs at the national level.

2.2.3.2. Selection of countries

Country selection for the SANCUS project was based on a strong set of criteria calibrated against international benchmarking standards for transparency and corruption. The primary criteria for selecting participating SANCUS countries was practicality based on relevant indicators relating to the level of freedom and the rule of law in each country. Reports from Freedom House, World Bank, and Reporters without Borders and Scale were used, where preference for the participating country was given to countries with a below-average score on the Corruption Perceptions Index. The capacity of civil society to take action against corruption (dialogue with institutions, oversight bodies, etc.) was also taken into account.



However, in practice the structure of the grant constrained the choices made by TI in terms of the number of countries to select. Although the first chapters selected to take part in the project were chosen rationally and objectively, technical and financial requirements forced the selection of additional chapters, and several of the ones that joined later reported that the period of implementation was too short to show the impacts of the actions developed during the implementation of the initiatives (Cambodia, Peru). As the grant stated that 60% of funds had to be allocated to non co-applicant chapters, but each country could not receive more than 200,000 euros, the Secretariat had to bring additional countries to satisfy these requirements. This is at odds with the EC's desire to see a systematic and mainstreamed approach across SANCUS, and could be improved were the restrictions to change to allow for fewer Chapters to participate. The large number of chapters involved may have contributed to the less effective operation of the co-applicant model, and may also have prevented the full implementation of the project's theory of change, as fewer of the chapters could implement the full scope of vertical and horizontal accountability related activities. The Discussion section expands on these points.

2.3. Effectiveness

2.3.1. Intermediate outcome 1 (IOc1): Civil society organisations and rights holders are more effectively mobilised to demand greater accountability and integrity through increased visibility, strategic advocacy and broad networks.

Overall, SANCUS was effective at enabling the mobilisation of CSOs and rights holders to demand greater accountability through increased visibility, strategic advocacy and broader networks. While visibility is hard to measure, an improvement is reported by CSOs we interviewed in the field, and advocacy was deemed impactful. However, the COVID-19 pandemic and the grant structure limited the possible outcomes and scope of IOc1.

As of June 2023, SANCUS has achieved and exceeded its targets on IOc1. 86 joint advocacy actions have taken place (target was 50) and 26 out of 26 chapters report that SANCUS has improved their capacity to pursue advocacy on democratic accountability issues (100%, of the target of 75%). For example, in Nigeria, the SANCUS project engaged with local NGOs and built capacity towards advocating together for better frameworks regarding corruption. The contribution of these advocacy efforts was significant as Nigeria passed an Electoral Act and an Anti-money Laundering Act in 2022. In Rwanda, thanks to the work of SANCUS, many citizens benefited from joint advocacy efforts: for example, the chapter collaborated with whistleblowers to denounce a local government official asking a citizen for a bribe.



However, these results could have been more significant. While COVID was a key factor preventing the implementation of joint activities during the inception phase, for example, other factors can also be taken into account, such as the limited budget available. Even though some activities were set up by video to adapt to the pandemic, the activities set up in person were more appreciated by chapter members (particularly the first meeting in Berlin), and more advocacy could have been facilitated with further in person meetings. Regarding the budget, the National Chapters and the co-applicant chapters have told us about several problems: firstly, the misunderstanding regarding the grant structure (more details on the grant structure are provided in the Coherence – Country selection section) affected the total budget available per country, which had an impact on the scale of the activities implemented. Regional and international activities in particular could have been more successful if the funds allocated and the target objectives had remained as ambitious as when the project was initially designed. In Rwanda for example, every advocacy activity led to further opportunities, which the chapter would have liked to pursue. In addition, the Inception phase could have been longer. This would have enabled more time to be taken to gather the opinions of the various stakeholders (outside the National Chapters) and would also have enabled a better understanding of the common issues, in order to create larger advocacy campaigns focusing on specific, common issues. Finally, the number of chapters included in this project could have been smaller, which could also have reduced the difficulty of finding common themes.

Despite an apparently well-developed network and effective advocacy campaigns, we are not aware of any increased visibility of corruption-related issues, particularly in the media. As explained by our interviewees in the National Chapters, these are notoriously hard to measure and attribute to the project. However, activity reports do highlight the fact that corruption-related issues are being taken more into account by international institutions or external stakeholders of the project. This can be supported by the collaboration between TI and other international bodies such as INTOSAI, International IDEA or IBP within the framework of the SANCUS project, a proximity which to a certain extent has made it possible to influence dialogue on anti-corruption issues at a global level. Additionally, the introduction of new laws and/or regulations demonstrates that the visibility of anti-corruption issues has been raised in the public sphere.

In Guatemala, we had the opportunity to ask external CSOs and beneficiaries who participated in the Social Audit School about their relationship with TI and visibility among other stakeholders: while some



were long-term partners, several respondents explained that they had never heard of Acción Ciudadana before and thought that the organisation and the work they had done together had helped them disseminate their work and network with others. TI Rwanda also highlighted the increase in visibility of their own partners related to the project.

One element of the project that significantly increased visibility in the sphere of anti-corruption work is the effort working with investigative journalists, supported by TI-S through Mastermind sessions, for example with the Organized Crime and Corruption Reporting Project (OCCRP). In Guatemala, Acción Ciudadana facilitated training for regional journalists in 2 departments (Quetzaltenango and Chiquimula), who learnt how to use their wide local networks to communicate on anti-corruption issues. However, it is worth mentioning that with all initiatives carried out by AC in Guatemala, the lack of funds made it impossible to follow up. Similarly, in Palestine, the 2023 report underlines that the project observed a significant shift in media journalists' approach, as they became more proactive in demanding accountability for the public budget.

The project's advocacy has also contributed to strengthening the activism, reporting and actions undertaken by CSOs in target countries. For example, the TI chapter in Colombia reported that the country's anti-corruption movement, known as Movimiento Ciudadano MCA, had been strengthened during the reporting period and that through their collective actions, the dissemination of anti-corruption messages has increased, which have been put on the agenda of the current government. All stakeholders in Guatemala stated that AC's advocacy and social auditing school contributed to a growing demand for accountability within the public sphere, which in turn led to the election of a President whose campaign was based on anticorruption.

2.3.2. Intermediate outcome 2 (IOc2): Civil society organisations meaningfully engage duty bearers in consultations, redress mechanisms, as well as in the monitoring and scrutiny of their responsiveness throughout the policy and budget cycles.

We find strong evidence to indicate that SANCUS made a significant contribution to foster government responsiveness, strengthen CSO's monitoring and scrutiny of duty bearers, and improve reporting mechanisms.

As of June 2023, SANCUS was on track to achieve its targets on IOc2. 25/26 chapters report that the skills and knowledge they gained through the project have improved their capacity to engage policy



and budgetary processes (this is about 96%, above the target of 60%), and 20/26 Chapters stated that the project improved their skills and knowledge, either “significantly” and “very significantly” (77%, above the target of 60%). This knowledge has enabled CSOs to participate in policy and budgetary processes, as exemplified in Kenya. The involvement of the Kenya National Alliance of Street Vendors and Informal Traders (KNASVIT) in the first Citizens' Audit conducted by the OAG demonstrates the direct role of the SANCUS project, these tools and the activities carried out within the framework of skills development. However, the project partners reported they would have benefited from more extensive activities (full-week modules) to ensure a fuller understanding of highly technical and complex issues. In Guatemala, participating CSOs enjoyed receiving a rigorous training project on social auditing, and all interviewed CSOs reported that they now feel confident monitoring and engaging duty bearers in consultations.

Although legislative, policy and procedural changes are slow to materialise, SANCUS is making a significant contribution to the implementation of measures to strengthen vertical accountability.

According to the second year's activity report, some governments are responsive to the actions taken by TI and its chapters. For example, the actions taken by the National Chapters have borne fruit, as demonstrated by the fact that the Zambian government has agreed to decentralize decision-making on certain budget management issues. Similarly, some chapters have noted that certain governments have begun to disclose more and better quality data (budget process, public contracting), as was the case in Brazil. In Palestine, for example, following a suggestion put forth by the CSTPBT (Civil Society Team for Public Budget Transparency), the Minister of Finance made a decree to form a dedicated committee responsible for conducting audits on the *al-maqasa* (clearance tax collected by the Israeli authorities on behalf of the Palestinians). In Colombia, a new bill was ratified to protect whistleblowers, and SANCUS played a significant part in that process by bringing this issue to the forefront of debates held between with journalists, public officials and private actors. TI's Anti-Corruption Helpdesk service produced research on Physical protection mechanisms for people who report corruption to support the National Chapter's position and advocacy on this matter.

While the activities implemented by National Chapters vary, many of them worked closely with CSOs and strengthened their involvement in the assessment and monitoring of duty bearers and public institutions' work. According to the activity report for the second year, members of civil society were extensively involved in the implementation of monitoring and scrutiny activities. The tools, particularly digital ones, and training provided as part of the project have been integrated by organisations into



their practices. For example, the project's Lebanese partners used the resource kit produced by TI and INTOSAI to monitor potential threats to the independence of the supreme audit institution in the country. In Guatemala, several CSOs have benefited from the training on social auditing (510 beneficiaries), and several of these CSOs have made plans to conduct their own social auditing process. In Morocco, the chapter has worked specifically with local CSOs in Meknez, Agadir and Rabat, to strengthen their capacity to study accountability, and on participatory budget monitoring. Some of the key strategies used by these CSOs are social audits (Maldives, Guatemala) and advocacy. One significant barrier to social audits is the high financial cost required to obtain all the necessary documents, as well as the time commitment, as explained by the CSOs we interviewed in Guatemala. A similar barrier is faced in investigative journalism: access to resources is difficult, and journalists have to be inventive /collaborate with their networks to obtain key documents which are not freely available through the freedom of information procedure, as stated by the investigative journalists we spoke with in Guatemala.

Overall, we find that SANCUS contributed to strengthening reporting mechanisms, notably through ALACs (Advocacy and Legal Advice Centres). The project has intervened to support the ALACs, and their presence has made it possible to receive complaints from citizens. SANCUS has contributed significant funds to strengthening ALACs, notably through the deployment of the Salesforce tool (datapoints on the number of people reporting to ALACs, enabling to see trends over time) and GlobaLeaks, which enables communication with whistleblowers in very sensitive cases. As of June 2023, 15,734 ALAC cases were in progress, which is above the target of 8,085 by the end of the third year. While only 47% of the ALAC grievances have been resolved, this has increased by 12% since the project's inception and is a good start (but a little under the target of 54%). In Rwanda, for example, the establishment of an ALAC enabled 45,000 complaints to be received since 2009. An advocacy strategy was then implemented alongside TI to channel these complaints. In Sri Lanka, the ALAC helped to report sextortion cases in the country.

SANCUS has also contributed to strengthening reporting on corruption through its work with CSOs, for example in Guatemala. The national commissions for probity have been strengthened by participating in the Social Audit Schools and linking with specific CSOs, which has helped them citizens know how to report on corruption cases, and under which circumstances it was possible to report.



2.3.3. Intermediate outcome 3 (IOc3): Civil society organisations more strongly advocate for enhanced parliamentary oversight, as well as stronger democratic accountability institutions and mechanisms, based on systematic monitoring and public reporting on their performance, using digital technologies.

Progress towards the horizontal accountability outcome (IOc3) was satisfactory, especially considering that fewer TI National Chapters had experience engaging with oversight institutions and could gain valuable new skills through SANCUS.

SANCUS National Chapters have made significant progress. 23/26 chapters stated that their skills and knowledge have been improved, which is 88%, above the target of 75%. Of these, 18 out of 26 stated that their skills and knowledge had improved either "significantly" or "very significantly". The project is overperforming in the use of digital tools employed to monitor and report on oversight institutions: 27 such tools have been developed, when the target was 19. However, several of the National Chapters we interviewed pointed to the difficulty of developing digital tools that could successfully be maintained in the long-term, beyond the project's ending, due to the high cost of hosting and troubleshooting digital tools. This was the case in Guatemala, Rwanda, the Maldives, Bosnia Herzegovina to cite but a few.

The SANCUS project has contributed to the implementation of anti-corruption laws and public policy reforms, although these changes take time and might be more visible in a few years. The second year's activity report highlights several contexts in which partner organisations have successfully participated in the implementation of anti-corruption legislation. For example, TI Palestine, through "collective advocacy, contributed to persuading the government to adopt recommendations into a draft law regulating the tax system". In Colombia, the ratification of a law protecting whistleblowers is currently debated, following advocacy efforts through the SANCUS project. In Armenia, the Teacher Ethics Code prepared by the Ministry of Education adopted 90% of the chapter's recommendations. In Jamaica, the chapter successfully advocated for a code of conduct for parliamentarians. In several cases, though, interviewees reported that legislative change takes time, and that while SANCUS could encourage those changes, it would take several years to see results. In many countries, engaging at the policy making level was impossible due to an adverse political climate (for example, Guatemala). However, although changes to the law are rare in terms of impact, it is likely that in the long term, better training of citizens



in social audit or corruption monitoring, journalists and NGOs in corruption issues at both vertical and horizontal levels will be beneficial and will lead to changes in legislation.

The actions carried out as part of the SANCUS project have contributed to improving or implementing the monitoring of oversight bodies. The MEL data from 2021 to mid-2023 showed 143 parliaments and oversight institutions were monitored by SANCUS-supported CSOs (3.2.1.i1), above the target of 95 by year 3 end. For example, in Palestine, the CSTPBT identified that one of the main reasons behind the chronic deficit in the Palestinian Public Budget was the continuous deduction of Palestinian revenues through al-Maqasa (clearance tax collected by the Israeli side on behalf of the Palestinians). Recognizing the urgency of the situation, the CSTPBT advocated for an audit to verify the accuracy of the amounts deducted by the Israeli side. As a result of the CSTPBT's advocacy efforts, the Palestinian government took action and issued a decision during its session No. 192 to establish a specialized committee responsible for auditing the deductions of the Palestinian clearance taxes.

Kenya provides an illuminating example to oversight bodies such as audit institutions (OAG) and parliament (APNAC) benefiting from the SANCUS project, complementing TI-K's vertical accountability work. The training and tools offered by the SANCUS project (Budget in particular) have helped these institutions and their members to better understand the technical control processes. Similarly, external actors such as investigative journalists have also benefited from the workshops and training courses and now have a better understanding of the problems linked to corruption, the logic behind the creation of a budget, the challenges of access to information and the possible recourse when information is not made available to the public.

2.4. Efficiency

While communication between TI-S and the National Chapters was generally good, improvements still need to be made to coordinate between chapters, and in particular to the co-applicant model, as well as to the management of resources, whether human or linked to the budget allocated to this project.

2.4.1. Resource efficiency

While the project carried out activities under the allocated budget, the overall financial and human resources were deemed limited, which resulted in a reduction in the scope and quality of activities. Similarly, the teams were sometimes understaffed or, at the very least, had to take on an excessive workload without being paid for the extra time they worked.



Significant challenges were encountered in planning the project at the global level due to the restrictions of the grant structure, which led to an adjustment in the budget after the project had started. 60% of the funds were meant to be spent by “third parties” outside of the TI Secretariat, but the EC clarified after the project had started that the co-applicant chapters were in fact included in the 40% portion allocated to the secretariat, which led to major changes in the budget. However, because there was a cap of 200,000 EUR on the amount that could be allocated to each National Chapter, this meant that the number of participating chapters had to increase to comply with the grant and reach 60% of the budget. As the project started in the context of the COVID-19 pandemic, activities were slow to start, which means that the project underspent. This led to several misunderstandings, as some chapters were unsure why they did not receive more funds based on their good work, while others were brought in much later (a year before the project was due to finish) to comply with financial projections. The EC itself wondered if some of the activities were necessary or just a way to spend the funds (e.g. video communications). At the national level, the project was deemed relatively flexible in terms of the allocation of budget. The EU allowed for 25% of flexibility within the budget headings, as reported by several chapters. Some National Chapters such as Colombia have noted while the reporting for the EU is easy, the elaboration of the budget is quite strict.

The practical consequences for chapters were that the budget often seemed too limited: as a result, many activities had to be deleted, some activities had to be merged, and the time allocated to these activities was reduced, which had a direct impact on their quality. For example, the Kenyan Chapter and the partners in this project pointed out that the activities carried out were too short and too rich in information. TI-Kenya pointed out that an annual conference on Parliamentary Oversight, which was supposed to welcome the other Sub-Saharan African chapters, had to be cancelled due to a lack of budget. Similarly, and concerning the overlapping of activities, the Association of Investigative Journalists and KNASVIT pointed out that it would have been simpler to have training modules established over a full week in order to be able to better integrate the information provided. Like Kenya, TI Rwanda has also had to restrict the number of its activities to stay within budget. TI Morocco also pointed out that, as part of the SANCUS project, it was unable to take part in face-to-face Mastermind sessions due to a lack of budget.

Alongside these budgetary issues, there has also been a shortage of human resources. **Like many actors in the development sector, TI is affected by projectisation, which has repercussions for the ability to**



retain staff long-term: human resource was not fully sufficient for this project. Some of the teams, particularly in the National Chapters, were not at full strength during the project. In some cases, the people in charge of financial management or MEL management were not present. As a result, project managers or other team members had to be equally involved in managing these issues, and this resulted in a heavy workload for most project members.

At the Berlin office, Staff turnover was moderate (with the project manager changing twice) but reportedly quite high at the National Chapter level, which led to delays in communication. It should be noted that the change of TI-S employees in charge of the SANCUS project may have destabilised communication between Berlin and the National Chapters. In particular, these changes have had an impact on the communication and dispatch of certain administrative and financial documents, and therefore on the monitoring of activities and actions, as explained by a Sub-Saharan African chapter. Similarly, the presence of a single person in charge of managing each project's MEAL plan and staff turnover does not guarantee accurate project monitoring. However, steps are being taken to ensure that teams are better trained in MEAL monitoring issues, as reported by the Kenya National Chapter, with TI-S leading specialised sessions on MEAL in 2023. While the onboarding process was overall smooth thanks to the existence of specialised documents, it was sometimes delayed by the difficulty to find the right talent and to bring them onboard. In particular, a key position at the Secretariat level was only filled several months after the beginning of the project due to visa delays.

At the National Chapter level, the presence of permanent employees specialised in MEAL issues would help teams to better manage data and meet the expectations of donors and TI, as reported in interviews. The staff changes within the teams seem important and are particularly visible in the evaluation process: the people we interviewed who were managing the SANCUS project could not comment on the project's inception.

Additionally, the workload could be very heavy in some cases: the case of the TI Kenya Chapter is quite telling in this respect. The lack of resources and the reduction in the budget had a direct impact on the workload of the SANCUS team. Since this Chapter was also a co-applicant chapter, national and regional management added to the already heavy workload. Within TI-S, the changing team may also have had a negative impact on communication during the Inception phase.



2.4.2. Monitoring and Evaluation

The National Chapters have found the MEL framework robust and relevant to their activities and objectives, but the large number of indicators has made the reporting process time-consuming and sometimes confusing. The indicators were deemed helpful as they were directly relevant to the project's targets and helped chapters visualise how far they still had to go. TI Colombia said that the addition of qualitative indicators could have helped to promote learning.

The number of indicators was deemed confusing by some. The EC reflected that there was a degree of repetition between indicators at the outcome and output levels, and that fewer indicators would be easier to follow. The reporting process was seen as difficult and confusing even for co-applicant chapters, despite the initiatives implemented by TI-S (MEAL Framework consultations, 1-to-1 support to chapters when completing the reporting, workshops), as the indicators were very numerous (regional, global indicators). Similarly, as the indicators have changed over the years, some of the data collected for these indicators have not been useful. Additionally, there was a lack of familiarity with certain indicators, due to their multiplicity, as explained in the Focus Group Discussion we organised with co-applicant chapters.

However, overall, project staff were satisfied with the data they were able to collect from National Chapters, although there were delays and the sheer volume of data was difficult to deal with. The presence of a person in charge of MEAL in each team to ensure the quality of the data sent made it possible to receive a smaller quantity of data. The amount of data collected meant that the TI-S team was overstretched and could generate delays in relaying feedback to the National Chapters or asking for clarification. As for the EC, it would have preferred to see data grouped by thematic activities rather than by countries: for example, the project's impact on investigative journalism worldwide could have been illuminated. According to the EC, the reports focus too much on outputs (e.g. training) rather than impacts. To know whether the project is reaching its beneficiaries, perhaps stories of change could have been employed to illustrate specific examples covering more than one type of activity. Instead of listing activities conducted with external partners (such as INTOSAI, IBP, etc). SANCUS could reflect on the changes it contributed to within sector dynamics. Future reports could be more engaging by incorporating further reflections and lessons learnt on the use of the tools, as well as more stories of change throughout the project.



At the Secretariat level, TI ensured that the data was accurate by a rigorous process of report vetting. The project assistant entered all the data and followed up to verify specific data sources. Media reports and academic papers were also followed by the core TI S team to ensure quality. Troubleshooting sessions were held to ensure that National Chapters knew how to report, and specialists helped chapters understand what was needed in terms of reporting on vertical and horizontal accountability.

2.4.3. Coordination

Communication from TI-S to the National Chapters and the co-applicant chapters was generally described as good, although there were a few exceptions. Similarly, communication from chapters to the secretariat was generally good. Between National Chapters, however, communication may have been less fluid, with the exception of the Latin America and Sub-Saharan Africa region.

In general, TI-S seems responsive and seems to meet the requests and needs of National Chapters by communicating effectively with them. 25 chapters stated that the level of support they received was **good or excellent**. However, while in some cases TI-S seems to be responsive to the needs and requests of TI National Chapters, like Cameroon, in others communication seems difficult, less accomplished and less systematic, like Panama and Honduras. In general, Latin American chapters tended to present questions first to Chile before approaching the TI-S, according to TI Colombia and Honduras. This can be seen as a strength, in the sense that decisions are taken as close to the field as possible, thereby affirming the role of the co-applicant chapters. However, this situation also created parallel lines of communication, as reported by other Latin American chapters.

Communication with TI-S is generally considered to be very good, but there is often a lack of feedback, particularly on annual and financial reports. To date, Chile, for example, is not certain that it has produced a correct financial report. In the case of Colombia, feedback was difficult to obtain, especially in the first half of the project. There were delays in obtaining comments on the narrative and financial reports, which our interviewees attribute to the high number of chapters involved and the demands on TI-S team's time.

Communication from the chapters to the Secretariat was overall good: there were sometimes delays in obtaining data from the National Chapters, but overall TI-S was satisfied with the engagement of National Chapters and their responsiveness.



Bilateral requests for help were present in some cases, but not in others. Exchanges took place in particular thanks to the presence of co-applicants, and in cases where there are synergies between the issues addressed by the countries concerned. According to the Secretariat, communication was often initiated by the National Chapters when they requested support.

With regard to communication between chapters, it was overall deemed a fundamental aspect of the project, but an underdeveloped one. Nine of the 26 chapters report that their collaboration with other National Chapters was limited, and one said it was non-existent.

Overall, the co-applicant model fostered communication and exchange in Sub-Saharan Africa and Latin America, but was much harder to implement in MENA and Asia. The communication among networks of some regions was frequent, sustained and helpful. The Latin American chapters, like TI Brazil, TI Honduras, and TI Colombia in particular valued the input of their peers. For example, Honduras received perspectives on its work regarding corruption in the education sector. In other regions, like Asia Pacific, the collaboration remained on very specific issues, like the investigative journalism training provided by Sri Lanka and attended by Indonesia. Cambodia reported that the regional aspect was more developed in some of their other TI projects. In MENA, while the scope of conjoined activities was limited, the chapters were in daily contact through WhatsApp and met 4 times in 2023 for training sessions, as reported by TI Morocco.

There could have been a more sustained use of these networks, for example to discuss broader shared issues directly with the EU, such as the protection of civic space in Latin American countries. The regional exchanges were appreciated and were effective when they took place according to a large number of National Chapters. However, due to budget restrictions, these exchanges were limited and could have been more effective if they had lasted longer. However, the co-ordination of workshops, meetings and exchanges between the various members of the National Chapters was appreciated. National Chapters (such as TI Kenya) also reported that they would have appreciated further joint advocacy activities.

2.5. Impact

The impact on both citizens and institutions has been significant, but more moderate for marginalised populations and the stakeholders' network.



2.5.1. Institutions

SANCUS had a significant impact on institutions, both in terms of vertical accountability, which is TI's 'bread and butter', and horizontal accountability, an area which had been hitherto less familiar but on which chapters gained valuable experience.

Several countries had to scale back on the planned advocacy action with oversight institutions, and the impact has therefore been more limited; but where it was possible, good results have been observed. SANCUS-supported CSOs had conducted 118 advocacy actions to increase demand-side pressure on oversight institutions by mid-2023, which was close to the target of 126.

In Guatemala, Acción Ciudadana did not manage to engage with oversight institutions due to the adverse political climate and the threats made by the government. To complete the oversight assessment tool, they had to rely on contacts who were happy to answer them, which was a smart adaptive strategy mirroring the advice published by TI in their brief on engaging reluctant duty bearers. This did not lead to any advocacy activities due to the tense political situation in the country, a situation which might evolve in 2024 due to the change of political leadership.

However, there are still some success stories to underline: according to the activity report for the second year, the activities carried out still have contributed to a better understanding of the role of parliament and its power by parliamentarians. Gambia Participates's second-year activity report refers to parliamentarians researching the rights, powers and duties of parliament and its role as an oversight body. The members of oversight institutions express satisfaction with the project and also support that it has been able to help them connect with external actors (journalists, CSOs, and citizens) to support their actions and exert more comprehensive pressure on the governments. In Kenya, for example, APNAC emphasises that the holistic approach of the project, aimed at engaging oversight institutions, civil society organisations, journalists, and citizens, contributes to exerting greater pressure on elected officials to share information. By actively involving citizens in understanding their rights and also the duties of elected officials, this project contributes to applying pressure on them in a bottom-up approach. In particular, TI Chile has created a website providing data enabling citizens to monitor the management and accountability of the Constitutional Convention. TI Chile also published their first study on youth perceptions on corruption, which was the first study ever on this topic in the country and helped the Direction of the National Anti-corruption Policy.

Regarding the countries where the vertical axis has been implemented, there have been some improvements in the response of duty bearers to citizens. In Brazil, TI made recommendations to the



27 state governments assessed under their Transparency & Public Governance Index on how to improve openness and performance, and recorded improvements in 13 state governments in direct response to these recommendations. The Accountability Index developed by the National Chapter has focused both on horizontal accountability (assessing the 27 legislative assemblies) and vertical accountability, helping CSOs and citizens to push local governments for access to information, which has caused policy and procedural changes in the areas of open data, whistleblower protection and access to information in over 70% of the municipal governments assessed. This tool highlights the shortcomings of governments at local or national level and areas for improvement. In Kenya, according to KNASVIT, the work done with local NGOs and citizens helped to question local councillors about the use of public funds for the construction of new buildings in certain areas of Nairobi. In Cameroon, the setting up of citizen advocacy committees (LCWACs) has enabled dialogue with municipal councillors and made it easier for citizens' demands to be heard. In Rwanda, the chapter was able to successfully collaborate with the Nyanza district officials to foster meaningful participation in the budget process, with key advocacy activities identified and integrating the district's strategic plan.

The main challenges were that information could take a long time to be published because it had to be gathered first, as in Brazil, but in some other cases, as in Kenya, the lack of legitimacy of civil society players or citizens prevented them from having a strong base on the duty bearers, as reported by APNAC. However, the training provided, and the networks formed as part of SANCUS were able to resolve this type of problem. In Kenya, numerous sources (APNAC, Investigative Journalist Associations, KENASVIT) provided feedback on how the trainings and workshops organized by TI Kenya helped them become more aware of anti-corruption issues and their rights regarding the government, as citizens.

2.5.2. Citizens

According to the data collected, citizens and rights bearers have been actively involved in this project, and have gained a better understanding of their rights and the government's duties in terms of transparency. In countries where vertical accountability was targeted, citizens have been able to benefit from training and participate in budget control processes, gaining a better understanding of the issues related to the fight against corruption. Not only were they more extensively involved in the monitoring processes, but they also may have gained skills in these areas because of their implication in the monitoring processes according to the 2022 Annual Report. Specifically, they have acquired knowledge about budget creation and control mechanisms, the role of parliamentarians, and their direct rights as



citizens. For example, the Office of Auditor General in Kenya published the first Audit written in collaboration with Citizens (CAA).

KIIs with beneficiaries in Guatemala show an improvement in their understanding and willingness to act in auditing and identifying corruption. Some of the interviewees think that there is a general movement towards citizens holding the state to account, after the 2015 demonstrations and visible again in the 2023 electoral process. SANCUS is helping citizens by making them ready to act. Appendix 4.4.1 gives further examples of citizen initiatives that were strengthened by the Social Audit School implemented by Acción Ciudadana in Guatemala.

2.5.3. Network

Overall, the SANCUS project has helped to form strong networks at national level. However, improvements could be made at the regional level.

The SANCUS project has successfully fostered networks between CSOs and journalists at the national and regional levels, mainly by creating opportunities for meeting and collaborating with new stakeholders and getting civil society involved. For example, the Kenyan Chapter network enabled CSOs to create bridges between various organisations. The actions of the civil society organisation KENASVIT were intersected with those of the Office of the Auditor General, leading to the drafting of the first Citizen Accountability Audit (CAA). Similarly, organisations like Mzalando participated in the creation of the Investigative Journalist Toolkit, that focuses specifically on parliamentary oversight reporting. The toolkit was used by TI Kenya to train journalists on corruption-related issues, and the chapter also collaborated with these journalists to enhance coverage of corruption issues and the role of parliamentarians, therefore providing citizens with better access to information. In Guatemala, the SANCUS project fostered collaboration between various CSOs working within the field of accountability, who had not necessarily received adequate training in social auditing, and strengthened their capacity to do so and relate to each other. For example, the Red Centroamericana de Mujeres las Tinajas, a women's advocacy group, reported that through the Social Audit School, their network had expanded.

Networks of investigative journalists have also been strengthened throughout the project, through bespoke activities aiming to hone their skills and learn from their counterparts in other countries, such as the workshop held in Zambia in 2023 for Kenya and Rwanda. The Maldives, Indonesian and Sri Lankan chapters collaborated to establish a network of investigative journalists in the Asia Pacific region. Beyond these outputs, it is also possible to start seeing impacts. In Colombia, the chapter reported that



journalists working on corruption transformed a network into a citizen anti-corruption movement. In Guatemala, investigative journalists from the capital led training sessions in Chiquimula and Quetzaltenango to help local media professionals learn about techniques to investigate and report on corruption, and our interviews with these journalists highlights that they were impressed with the results from this training, which needs to be upscaled and monitored.

Through networking, the project also contributed to experience sharing between different chapters, but performed below the chapters' expectations, as they would have wanted to see greater collaboration considering the scope of the project. Experience sharing took place during spotlight sessions, through which specific chapters imparted the lessons they had acquired (such as Brazil's presentation on assessing governance and transparency at the sub-federal state level), and mastermind sessions which invited external stakeholders such as INTOSAI or the IBP to focus on specific themes. The survey indicates that these sessions were well-received, with 20 chapters stating that the skills and knowledge gained that way significantly or very significantly improved their capacity to meaningfully participate in policy or budgetary processes, and 18 chapters answered similarly regarding their capacity to monitor oversight institutions. There were several opportunities for learning from the other chapters, in person (including the SANCUS Advisory Committee Meeting in Berlin, the Zambia workshop on journalism, the Bogota meeting on ALAC work, the Democratic Accountability Workshop in Livingstone, and several peer-to-peer exchange visits) but also digitally (regular meetings). TI-S also implemented a consultative workshop in Kenya focused on the Parliamentary Oversight Assessment Tool, which was deemed useful by all participating chapters according to the feedback survey.

However, considering the scope of SANCUS, and the fact that each country had its own stream of work, several chapters remarked that the project did not reach its full potential for regional collaboration. For example, the Europe and Central Asia as well as the Asia Pacific countries barely collaborated, since their activities were so different, and due to the lack of a critical mass of involved National Chapters. While they enjoyed meeting and learning from each other, they do not necessarily envision further collaborations. In Latin America, there was a sense that greater synergies could have been achieved by focusing on pan-regional issues, instead of each chapter working in silos. This could have been facilitated by greater clarity on the role of co-applicant chapters, and of the expectations that SANCUS carried.



2.5.4. Marginalised groups

SANCUS went beyond the dissemination of information to marginalised communities, and focused on ensuring that they would get a seat at the table to demand greater accountability from the state institutions.

This approach was particularly successful in contexts where the project operated at the grassroots and CSO level, for example in Guatemala, Morocco or Kenya. Marginalised communities covered by the SANCUS project include women, youth, indigenous populations, people living with disabilities, LGBTQI+ communities, migrant groups, people living in rural areas and the elderly. These communities have been integrated into the dialogue groups implemented, alongside the other stakeholders, according to the second year's activity report. The project has helped to make marginalised groups less vulnerable to corruption. For example, several actions have been carried out (recommendations, consultations with duty bearers) aimed at combating sextortion, which particularly affects women, in Palestine, or Rwanda. The fieldwork in Guatemala provided several examples of indigenous people and women getting more networked with CSOs working on formal complaints, such as a local CSO spearheaded by a Maya woman in the Sacatepéquez, which has disseminated the training received on social auditing in its local community.

However, in certain contexts, the participation of certain groups was more difficult: in the case of the National Chapter in Panama, the invitation was not extended to LGBTQI+ groups due to the presence of certain elected representatives. The constant marginalisation of these groups has prevented them from developing the skills needed to occupy a politicised space, and dealing with this structural issue was a challenge for the National Chapter. Another of the issues with SANCUS is the emphasis on digital tools. This is exclusionary in many contexts where the project operates. Several chapters, like Guatemala, Maldives, Bosnia and Herzegovina, have scaled down the reliance on digital tools, as they feared this would not lead to dissemination in rural and marginalised contexts.

2.6. Sustainability

The SANCUS project is performing well in terms of sustainability, although all stakeholders voiced their fear about the project ending and losing its momentum. SANCUS has made it possible to build networks at different levels, and has established solid knowledge and expertise, as well as tools that have been adapted and adopted by the various stakeholders.



2.6.1. Legacy

The SANCUS project has been able to make its mark in an incremental way, developing the knowledge and skills of its partners while proposing adaptable tools that will be reused by them.

The training and experience provided by the SANCUS project have enabled the National Chapters to gain sufficient mastery of the issues addressed to be able to continue to implement initiatives related to state accountability and transparency after the end of the project. In some contexts, such as Zambia, projects in the accountability sphere tend to focus on vertical accountability and the opportunity to combine this approach with activities focused on horizontal accountability was welcome.

At National Chapter level, the workshops and support provided by TI-S and the co-implementing chapters have enabled the less specialised chapters to develop their knowledge of anti-corruption issues at both vertical and horizontal levels. Furthermore, initiatives are already planned in some cases to follow up on this project. The added value of SANCUS, compared to bilateral agreements, was to foster discussions on a global scale through peer to peer sharing of lessons, difficulties, and strengths according to the European Commission. While National Chapters would have liked this aspect to be even more developed, it is a testament to the need for a global approach with chapters learning from each other. National Chapters identified some key gaps on which they would have liked to spend more time developing synergies, had they had the time and resources, such as the protection of whistleblowers in Latin America.

However, the extent to which National Chapters and their partners feel they can capitalise on the tools, toolkits and research methodologies for internal learning varies. Some have already made plans to keep using them: in Zambia, for example, a modified version of the horizontal accountability tool has been developed to track parliamentary action. Some others find it an interesting exercise but do not currently prioritise to follow up on the findings through actions due to the adverse political situation, such as in Guatemala. This has consequences for their ability to disseminate the tools.

One key challenge to sustainability with project partners is the loss of momentum generated by the project's end. After so much engagement with stakeholders, especially parliamentarians and political agents, it will be a challenge to pick up the project again in 2025 or later with a political landscape that might have changed, and partners who might have moved on, according to TI-S.

Despite the potential loss of momentum at the project's end, the SANCUS project has helped to develop debates and actions in the fight against corruption in an incremental way, and may also have inspired



new actions. The International Budget Partnership was consulted during the elaboration of the vertical accountability tool (Participatory Budgeting) due to their own experience designing and implementing the Open Budget Survey. The collaboration went a step further as TI's tool was then augmented (with qualitative indicators) and rolled out by IBP in 5 pilot countries.

The SANCUS project has also helped inspire stakeholders to develop new partnerships, as shown in the example of INTOSAI. Supreme Audit institutions traditionally have not engaged with CSOs, and it is a legacy of SANCUS that TI and INTOSAI Development Initiative (IDI) are now engaging to foster more collaborations between SAIs and CSOs in oversight of financial activities by governments, according to TI-S. TI and INTOSAI Development Initiative (IDI) have also collaborated on safeguarding the independence of supreme audit institutions through jointly publishing a resource kit for CSOs on safeguarding SAI independence, co-funded by the SANCUS project. They have already engaged in various countries such as Sierra Leone, Ecuador, Colombia and Montenegro to respond to SAI independence threats, based on IDI's SAI Independence Rapid Advocacy Mechanism. Moreover, TI and IDI are currently exploring potential opportunities for collaboration beyond SANCUS.

2.6.2. Future collaboration

The expertise acquired by the partner organisations and the networks established ensure continuity in the implementation of anti-corruption measures in the countries where they operate.

This project has enabled CSOs to acquire valuable skills and to act as central organisations and experts on these issues in the country. Several National Chapters, like TI Cameroon, have reported that after the end of the project, the CSOs they worked with would like to continue with similar actions. In Kenya, the organisation KENASVIT pointed out that the citizens who make up this organisation now have a greater knowledge of their rights in terms of public accountability. In addition, their understanding of the mechanisms to call out elected representatives (petitions, public participation) will enable them to continue their actions even after the SANCUS project has come to an end. The donor was particularly impressed with the localised approach of SANCUS, as CSOs need to be empowered to know how to work within their local system, according to our interview with the EC. Specific areas that were strong were the capacity building elements around social audit and investigative journalism.

Concurrently, at the country level, SANCUS has strengthened partnerships between the National Chapters and other stakeholders, which will enable them to continue efforts in the sphere of



anticorruption beyond the project's end. For example, the National Chapter in Guatemala successfully implemented the Social Audit School thanks to a partnership with several stakeholders including the San Carlos University and the Carter Centre (an American INGO). The University has expressed interest to continue rolling out the Social Audit School after the end of SANCUS, and it will become a permanent feature of Acción Ciudadana, in part through complementary funding (the name of the donor was not shared with us for anonymity reasons).

In terms of external stakeholders, there is significant interest from institutions such as IBP, IDI's INTER PARES and INTOSAI to pursue joint opportunities in the future. For example, TI and INTOSAI have developed a project proposal to continue strengthening CSO-SAI cooperation in Africa. According to these external stakeholders, the main obstacle to further collaborations is the lack of an enabling environment, as joint funding opportunities are few and far between.

2.6.3. Tools

The project tools are overall perceived as innovative and complementary within existing approaches, and several plans have been made to keep using them, both within TI and beyond.

At the TI level, plans have been made to use the two main tools (on parliamentary oversight and participatory budgeting) for different projects within the organisation. The tools and resources on parliamentary oversight developed under SANCUS informed the theme for the November 2023 Political Integrity Bootcamp at TI which will be attended by chapters in Europe and the Balkans. Most of the tools developed as part of SANCUS are relevant, and some National Chapters have integrated them into their activities. In Rwanda, plans have been made to continue using the public participation in budget processes tool in the Nyanza district and possibly elsewhere, through collaboration with other partners. In Zambia, the National Chapter hopes to use the horizontal accountability tool every 3 or 5 years to keep refreshing its knowledge and monitoring parliamentary action. TI Kenya also expressed interest in adopting the parliamentary oversight assessment tool at the county level.

The tools have also been piloted by key partners such as the International Budget Partnership (IBP), which has trailed a modified version of the participatory budget monitoring tool in five countries. However, it should be noted that some chapters have developed their own tools, going beyond the two core global tools. In Kenya, the resource guide aimed at investigative journalists has seen continuity in another project implemented by TI-K operating with investigative journalists (Media Tech Hub), which



aims to teach investigative journalists to make better use of the research and analysis tools at their disposal to fight corruption. In Gambia, online platforms to report cases of corruption have also been established, which will continue to be utilised after the conclusion of this project. The uptake of these tools can be attributed to the fact that they were designed collaboratively with experts in the field (for example, the Inter Parliamentary Union (IPU) and INTER PARES weighed in on the parliamentary oversight tool) which enables them to fill key gaps in the sector.

3. Discussion

SANCUS was underpinned by three complementary innovations: an overarching Theory of Change based on the vertical/horizontal accountability model, supported by a flexible and context-specific problem-solving approach, and facilitated by a regional mode of collaboration known as the co-applicant model. To inform future TI projects, this evaluation focuses on their respective strengths and weaknesses below.

3.1. The Theory of Change: between ambition and feasibility

The Theory of Change was an interesting theoretical model but sometimes came short when confronted to the reality of implementation. While focusing on one of the two aspects is a realistic response and a way to tackle the accountability problem from a different angle when there is a specific blockage, our findings have shown that fully articulating horizontal and vertical accountability is harder to implement in practice.

External stakeholders in particular (INTER PARES, INTOSAI, IBP) commented on the importance of working on accountability from different angles, and saluted SANCUS's initiative in that domain. The chapters that did manage to work on both aspects highlighted the relevance of this approach, as vertical and horizontal accountability mutually reinforced each other. However, to fully test the approach across a majority of contexts, SANCUS would have needed to deploy more resources in each country. The project design is predicated on the combined and complimentary effects of interventions that enhance vertical and horizontal accountability. According to the project Handbook, 21 of the 26 National Chapters were supposed to implement the full approach as described in the theory of change. In fact, we find little evidence that the project was able to test this hypothesis through its activities, which varied considerably from one country to the next. Based on the endline survey and KIIs, of the 26 National Chapters, 11 managed to implement both horizontal and vertical accountability activities, and a further 10 managed to implement both to a limited extent (Table 1). , In this context, "limited" means that they conducted one of the two global assessment methodologies but did not implement

activities in that sector, or deem that they have not met their own expectations. The fact that National Chapters were able to pursue EITHER vertical OR horizontal approaches limited opportunities for testing the value of a combined initiative. This means that besides the 5 Chapters who joined SANCUS in 2021 specifically to work on the horizontal or vertical accountability tool, another 10 did not manage to implement the full scope of the project either because of a lack of resources or an adverse political context.

Table 1. Summary of implemented actions in each National Chapter, based on the endline survey and KIs.

The crosses indicate which areas the National Chapter was supposed to focus on according to the Handbook. The green areas indicate actions that took place, the light orange areas indicate limited actions, and the orange ones actions that were not implemented.

	Horizontal Accountability actions	Vertical Accountability actions
Armenia	X	X
Bosnia	X	X
Brazil	X	X
Cameroon	X	X
Cambodia	X	
Chile	X	X
Colombia	X	X
Gambia	X	X
Guatemala	X	X
Honduras	X	X
Indonesia	X	X
Jamaica	X	
Jordan	X	X
Kenya	X	X
Lebanon	X	X
Madagascar		X
Maldives	X	X
Morocco	X	X
Nigeria	X	X
Palestine	X	X
Panama	X	
Peru		X
Rwanda	X	X
Sri Lanka	X	X
Zambia	X	X
Zimbabwe	X	X

While the ambition of the project's ToC is admirable, to be able to test the hypothesis more consistently the project should consider focusing on a smaller number of chapters working on specific workstreams within these two accountability dimensions, with more targeted resources and a longer timeframe. This is an issue related to the project's overarching problem-driven approach, and the tension between flexibility and mainstreaming/systematisation, as described below.



3.2. The problem-driven approach

While the great flexibility demonstrated by SANCUS was praised by National Chapters as it allowed them to choose country-relevant activities and streams of work, it also involved a trade-off in terms of mainstreaming and systematising the approach.

The adaptability of this project is both a strength and a weakness: since countries have the choice between implementing activities related to horizontal or vertical accountability, many of them only implement activities related to one of these two axes (based on the socio-political context at play within their respective countries). Besides, as chapters only address specific streams of the ToC, the extent to which the ToC can explain impact at the national level is limited. Thus, the intended complementarity underpinning the ToC, proven to be effective by political sciences, is only achieved in about half of the participating chapters in practice. This is a good result, considering the contextual difficulties, but perhaps SANCUS could have had even better impacts on promoting accountability in a holistic manner with a more targeted approach.

Besides the two overarching research tools (public participation in budget processes and parliamentary oversight), the ALAC work and the focus on investigative journalism, several National Chapters have commented on the lack of a cohesive project approach at the global level. To most of them, the project was very successful at pushing the accountability agenda forward at the national level, but it encountered more difficulties at enacting a regional agenda. This can be explained by the time and budget constraints of SANCUS, which led National Chapters to prioritise activities they could do well at the local level. Due to restrictions in the grant structure, SANCUS had to select a number of participating chapters greater than initially envisioned, with more restricted funds. To a certain extent, the number of participating chapters did guarantee that commonalities and synergies could be found at the regional level, especially in regions with a critical mass of participants (Subsaharan Africa and Latin America). Yet, the project could have been stronger by focusing on fewer National Chapters with the resources to work on all aspects of accountability and engage regionally, where the whole would be greater than the sum of its parts. The co-applicant model was intended to foster synergies at the regional level, but it was a solution with its own limits, as explained below.

3.3. The Co-Applicant model

SANCUS was the opportunity for TI to pioneer a new approach, in which four National Chapters were responsible for the coordination of regional activities, and were involved more closely in the project proposal as co-applicant chapters. This model sought to promote a more bottom-up approach to



project management, with governance and coordination happening closer to the operational level, with a better understanding of contextual realities.

Overall, the co-applicant model has been promising in some regions (Subsaharan Africa, Latin America) and underwhelming in others (MENA, AP, Europe). It created parallel lines of communication and was not clear to all participants. Its strength was in decentralising the mode of operation, and the model was only moderately successful at that.

There was a degree of miscommunication around the role of co-applicants, which was sometimes perceived as a parallel line of reporting to TI's Regional coordinators and created confusion, as reported by several National Chapters. This hampered the communication among chapters at the regional level. At the start of the project, some National Chapters have reported that they were not aware of the existence of co-applicants or fully understanding the scope of their role. It was also easier to communicate and coordinate projects with some chapters than others: for example, in Latin America, Colombia, Guatemala and Chile collaborated together more than with the rest of the chapters in the region, due to shared themes of work. In Asia Pacific, Sri Lanka struggled to find common threads between the thematic focus of the four chapters, and the amount of collaboration was underwhelming. They ended up conducting a workshop on working with journalists, as this was the only commonality. While the two main research tools found some common ground among many chapters, they arrived later in the process (2022): they responded to a collaborative approach requiring significant time to maximise relevance, which was a trade-off considering the short period available for SANCUS implementation.

The co-applicant chapters also participated in the formulation of regional activities for the SANCUS project, and created some opportunities for resource sharing, but had to maintain a delicate balance between supporting regional National Chapters and telling them what to do. The co-applicants were responsible for coordinating regional peer-learning, which led to several opportunities, as exemplified by a workshop for investigative journalists in Zimbabwe. The co-applicants were responsible for reporting on joint activities and peer learning. Several chapters consider that while an interesting model of governance, the co-applicant model did not fulfil the expectations. 9 of the 26 chapters regard the degree of collaboration with other chapters as limited and one as non-existent, according to the survey. The chapters also report that they were hoping this model could lead to joint advocacy initiatives, which have been slow to implement, but would benefit from a longer project timeframe. There could also



have been further global discussions capitalisation sessions building on the examples highlighted in the Spotlight sessions to reflect on what activities worked best in which contexts, and more discussions to create regional dynamics involving also local EU delegations.

However, to a certain extent, the co-applicant model has proved useful in enabling National Chapters to have access to an intermediary between themselves and the TI Secretariat. The co-applicants acted as a direct point of contact for the chapters, helping to meet their needs in several areas (for example, helping them understand financial reporting, or assisting with language issues in Latin America). For some chapters, this was a significant help, while others reported that they would turn straight to TI-S when they had questions. The co-applicants felt that it was easier for the chapters to turn to them, since the hierarchical relationship between them and the co-applicants was weaker compared with the Secretariat. Some issues were also shared; for example, most MENA chapters experienced difficulties with the changing political landscape and were in regular touch to share solutions.

The co-applicant logic was appreciated and could, for example, be integrated in a complementary manner to the work of TI-S regionals advisors for better action on the ground and better delegation of certain management procedures by TI. For this to be successful in the future, the role of co-applicants needs to be more clearly explained to the National Chapters themselves, so that they know how to fully utilise the available support, and more resources need to be devoted to co-applicant chapters: for example, Sri Lanka reports that they experienced high staff turnover and did not have the human resource capacity to lead more regional initiatives.

4. 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 is 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.

4.1.3. 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.

4.1.4. 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.

4.1.5. 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.



4.1.6. 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.



4. Appendices

5.1. Methodology: Index and Data sources

Adhering to OECD-DAC criteria, the Aleph Evaluation Index establishes a framework for data collection and analysis, ensuring that we gathered and cross-verified data comprehensively across six pillars: Relevance, Coherence, Effectiveness, Efficiency, Impact, and Sustainability. The essential pillars of *relevance*, *coherence*, and *efficiency* encompass a general set of evaluation areas common to most development projects. These are based on qualities that typically signify effective project management. The pillars of *effectiveness* and *impact* are tailored to the SANCUS results framework, reflecting the contained indicators. In terms of *effectiveness*, we aimed to surpass measuring progress solely based on the SANCUS target indicators. We aimed to provide a meaningful analysis of whether the project's tools were effective in achieving the target objectives and if they could be utilised in future TI projects. Finally, the *sustainability* pillar involved deeper reflection on the replicability and enduring impact of SANCUS, both within TI, CSOs, and partner organisations.

We subdivided each pillar into key areas for analysis. For instance, within *coherence*, our focus encompassed *external coherence*, *internal coherence*, and *structural coherence*. Each of these areas corresponds to a specific set of indicators, each of which has been associated with a 'desired state.' The desired state is a concise narrative statement outlining project expectations regarding the indicator. This was further fine-tuned based on the team's perception of what is realistic. For example, in the *replicability* area of the *sustainability* pillar, one indicator corresponds to the Tools, and the desired state is articulated as follows: 'Project tools have broader relevance to other projects. There is potential to scale tools developed under SANCUS into other TI projects.' We assigned a colour-coded score to each indicator based on the analysis, with ratings ranging from 1 (poor) to 3 (good). These scores were intended to visually represent project performance across the entire index, facilitating focused recommendations for our team. We utilised this index as a foundation to craft our evaluation report, and to structure our analysis.

The index also delineated the data sources collected for each indicator, forming the basis for our analysis. Our analysis was based on triangulated data from interviews, questionnaires, project literature, and our field missions to Guatemala and Kenya. We have therefore tried to assess the extent to which the "desired states" listed in our Index have been achieved.

Regarding data collection, we were able to interview a wide range of stakeholders, both online and in person: we carried out a total of 59 Key Informant Interviews (KIIs). In Kenya, these included the TI



Secretariat; TI Kenya members in charge of the SANCUS project, as well as partners from civil society and the country's oversight institutions. In Guatemala, we were also able to meet the members of TI Guatemala in charge of the SANCUS project, as well as partner civil society organisations and direct beneficiaries in the cities of Antigua and Chiquimula. The questionnaires we used for the interviews can be consulted in Appendix 4. The field visit in Kenya also gave us the opportunity to attend forums and training workshops organised by the chapters concerned, and thus to understand the structure of the activities carried out by TI-K, as well as the network that this organisation has at national level.

In parallel to these interviews, we carried out **two Focus Group Discussions** (FGDs): one with the Sri Lankan, Chilean and Palestinian co-applicant chapters, and a separate one with the Kenyan co-applicant chapter. These discussions gave us the opportunity to discuss the direct contributions and challenges of this model to the SANCUS project, and to assess its relevance to the structure of Transparency International as a whole.

At the same time, we also reviewed the relevant literature provided by TI-S. The list of documents studied included national and regional annual reports, financial reports, annual work plans, the MEAL plan and other project documents. We were also able to study the training materials made available to us. A full list of the documents consulted can be found in Appendix 1.



5.2. Appendix 1: List of Documents Consulted

Table 2: List of documents consulted

Author	Date	Document
AME Region	2022	AME Regional Update Calls
AME Region	2022	Communication Strategy
AP Region	2023	Regional Update Call
AP Region	2022	AP Regional Planning Input and Output
AP Region	2022	Draft SANCUS Workplan for in country actions
AP Region	2022	LGA Report on Public Procurement
Global Leaks		Project Overview and Examples
MENA Region	2022	Regional Planning - Input and Output Template
MENA Region	2023	Regional Update Call
SSA Region	2021	SSA National Level Workplan Matrix
SSA Region	2022	AACD Activity Mapping
SSA Region	2022	Logistic Note - Peer to peer learning workshop for Investigative Journalist
SSA Region	2022	Presentation IP Symposium
SSA Region	2022	Social Accountability Topic Guide
SSA Region	2022	SSA Regional Planning Input and Output II
TI-Armenia	2021/2022	Annual Report
TI-Bosnia and Herzegovina	2021/2022	Annual Report
TI-Brazil	2021/2022	Annual Report
TI-Brazil	2022	Spotlight Session Assessing the Transparency and Governance of States and Municipalities
TI-Cambodia	2021/2022	Annual Report
TI-Cameroon	2021/2022	Annual Report
TI-Chile	2021/2022	Annual Report
TI-Chile	2022	Rendición de Cuentas y Poder Legislativo
TI-Chile	2022	SANCUS Vertical Accountability Workshop Chile
TI-Colombia	2021/2022	Annual Report
TI-Gambia	2021/2022	Annual Report



TI-Guatemala	2021/2022	Annual Report
TI-Honduras	2021/2022	Annual Report
TI-Indonesia	2021/2022	Annual Report
TI-Jamaica	2021/2022	Annual Report
TI-Jordan	2021/2022	Annual Report
TI-Kenya	2021/2022	Annual Report
TI-Madagascar	2021/2022	Annual Report
TI-Maldives	2021/2022	Annual Report
TI-Nigeria	2021/2022	Annual Report
TI-Palestine	2021/2022	Annual Report
TI-Palestine	2023	Letter to the Prime Minister
TI-Peru	2021/2022	Annual Report
TI-Rwanda	2021/2022	Annual Report
TI-Zambia	2021/2022	Annual Report
TI-Zimbabwe	2021/2022	Annual Report
TI-Zimbabwe	2022	Unpacking vertical and horizontal accountability in local councils
Transparency International Secretariat	2020	Grant Contract
	2021	SANCUS Communication & Visibility Plan 2021 - 2023
	2021	SANCUS Kickoff Session 2021 Horizontal Accountability Ideas
	2021	SANCUS MEAL Plan 2021 - 2023
	2021	SANCUS Regional Chapters Meeting
	2021	SANCUS Workplan Template for in-country Actions
	2021	Thematic Cluster Mapping
	2021	Y1 Report
	2022	Assessing Public Participation in Budget Processes. Assessment Toolkit and Indicators
	2022	Parliamentary Oversight Assessment Tool
	2022	SANCUS Project Handbook
	2022	SANCUS Vertical Accountability Strategy
	2022	TI SANCUS Advisory Committee Meeting & Data Literacy Training
	2022	Y2 Report
	2022	CSO Interventions to Enhance Parliamentary Oversight



	2022	Draft SANCUS Work Plan for in country actions (TISL)
	2022	Overview of Parliamentary Oversight Tools and Mechanisms
	2022	Peer Learning Exchange Visit presentation
	2022	Public Participation in Budget Processes (PPT)
	2022	SANCUS Chapters Meeting Potential Collaboration with IDI
	2022	SANCUS Global Communications plan
	2022	Social Accountability & Social Audits
	2022	SANCUS REGIONAL PLANNING: AP – Inputs and Outputs Template
	2022	Thematic Cluster Mapping
	2022	Vertical Accountability Workplan (Draft)
	2023	End of project Feedback, Evaluation and Learning Survey
	2023	MEL Glossary
	2023	Regional Update Call Q1
	2023	Vertical Accountability Workplan (Draft)

4.3. Appendix 2: List of Key Informant Interviews and Focus Group participants



Table 3: List of interviewed stakeholders.

Category of Stakeholder	Sub-category	Organisation	Person	Position
TI Secretariat	TI-SANCUS		Alice Gracy	Project Manager
			Matthew Jenkins	Research Lead
			Daniela Werner	MEAL Lead
			Jorum Duri	Horizontal Accountability Lead
			Anoukh de Soysa	Vertical Accountability Lead
			Amrith Chheang	Project Associate (MEL/reporting support, Communications, Admin)
	ALAC		Maria Sideri and Alison Matthews	Focal point to provide support on digital platform (ALAC and GlobaLeaks)
National Chapters	AME	TI Brazil	Maria Dominguez	Public Integrity and Governance Program Coordinator
		TI Colombia	Claire Launay Diego Andrés Quintero Sánchez	
		TI Guatemala	César Vega	Project Coordinator
			Edie Cux	ALAC Manager
			Ana Sayas and Jesus Chuquiej	Finance Team
			Manfredo Marroquin	Executive Director
		TI Honduras	Lester Ramírez Irías, Dineyla Erazo and Carmen Bueso	
		TI Jamaica	Marlon Moore	
		TI Panama	José Benitez	Senior Project Officer
		TI Peru	Carlos Arroyo and Mayra Pérez	Director del Programa de Auditoría Ciudadana y Gobierno
	AP	TI Cambodia	Norin Im	Director of Projects
			Ratha Keng	Project Manager
		TI Indonesia	Alvin Nicola	



		TI Maldives	Aminath Haifan, Asiath Rilweena, Mariyam Ajfaan and Azza Mohamed	
	ECA	TI Armenia	Gayane Baghdasaryan	Project Manager
		TI Bosnia Herzegovina	Emsad Dizdarevic	Project Coordinator
	MENA	TI Jordan	Abeer Mdanat	
			Amani Sahoury	
		TI Lebanon	Pamela Chemali Raffoul Julien Courson Ziad El Chami Hoda Moussa	Head of Programs
				Executive Director
				Finance and Administration Officer
				Accountant
		TI Morocco	Sanaa Zouanat	Project Manager
	SSA	Gambia Participates	Annetta Mahoney	Project Manager
		TI Cameroon	Claude Hypdo	Project Manager
			Simeu Francis	Project Manager
		TI Madagascar	Domoina Andriamialison	Administrative Officer
		TI Nigeria	Samuel Oyimafu Asimi	Program Officer (Anti-Corruption)
			Bathsheba Tagwai	Senior Legal Officer (Primary Contact)
		TI Rwanda	Alain Sano Mugenzi	
		TI Zambia	Tommy Singongi (TI ZM)	SANCUS project manager
		TI Zimbabwe	Nqobani Tshabangu	
			Tafadzwa Chikumbu	
Co-applicant Chapters	AME	TI Chile	Svenja Bonnecke	Project Coordinator
	SSA	TI Kenya	Titus Gitonga	Project Coordinator
			Abrahams MISOI	Project Manager
			Brian WABALA	Project Assistant
			Caroline GIATHI	Advocacy and Communications Officer
			Dennilison MUSAU	M&E Officer



			Lazarus OYUGI	Finance Officer
	MENA	TI Palestine	Lamees Farraj	Project Coordination
	MENA	TI Palestine	Hama Zeidan	Operations Director
	AP	TI Sri Lanka	Sankhitha Gunaratne	Deputy ED
	AP	TI Sri Lanka	Infas Lebbe	Finance Manager
External Stakeholders		International Budget Partnership	Brendan Halloran	Head of Strategy and Learning
		EU Delegation in Kenya	Alexandre Baron	Head of section, Governance & Macroeconomics
		EU Delegation in Guatemala	Jennifer Echeverria	
		European Commission	Simona Gallotta	Policy Officer, Governance
			Jeanette Klangefeldt	Head of Section
		INTOSAI Development Initiative	Freddy Yves Ndjemba	Senior Manager in the SAI Governance Department
Partners and Beneficiaries	Kenya	International Institute for Democracy and Electoral Assistance	Ingrid Walker	Programme Manager, INTER PARES
		Office of the Auditor General (OAG)	Faith Pino	Deputy Director
		African Parliamentarians Network Against Corruption (APNAC)	Nyawira JEDIDAH	Programme Manager
		Mzalendo Trust	Caroline GAITA	Executive Director
		Kenya Parliamentary Journalists' Association	Sharon KIBURI	Investigative Journalist
		Kenya Nation Alliance of Street Vendors and Informal Traders (KNASVIT)	Samuel MBURU	Secretary General



		Kawangware Youth Paralegal Trust (KAYPAT)		
	Guatemala	Carter Center	Sofia Villatoro and Flor Salvador	
		Universidad San Carlos de Guatemala	Marvin Moran	
			Waleska Aldana	Academic Coordinator CUNORI
		Red Nacional de Comisiones y Colectivos por la Transparencia y Probidad	Luis Compa and his team	National Coordinator
			Fernando Coolum	Transparency Commission in Sacatepéquez
		Investigative Journalists, formerly at El Periodico	Rodrigo and Ricardo	
		Social Auditors trained through the project	Maria Fernanda Lopez	Sanik, San Antonio, Sacatepequez
			Two students from CUNORI	Chiquimula
			Kenia L.	Red Centroamericana de Mujeres las Tinajas
			Nuria Cordón	Red de Mujeres de Chiquimula



4.4. Case study reports

4.4.1. Guatemala

Implementing chapter	Acción Ciudadana (AC)
What activities have they carried out?	<p>The main focus of the SANCUS project was the Social Audit School, which was delivered over several weeks in a virtual format (2021) and hybrid format (2022, 2023). 510 individuals were trained, many of which represented marginalised communities.</p> <p>AC also carried out the parliamentary oversight tool, mainly through independent contacts with parliamentarians, which was possible because the tool carried the name of Transparency International and not Acción Ciudadana.</p>
Target beneficiaries	Citizens and CSOs participating in the Social Audit School, investigative journalists, other external stakeholders in Guatemala and Central America
Key allies	<p>Centro Carter. This American INGO has been a close ally of AC since they collaborated on the bill for access to information. Within the SANCUS project, the Carter Centre provided material for the module on access to information within the Social Audit School. This was delivered in 4 different regions. Centro Carter was keen to integrate a gender aspect to the work conducted with the Social Audit School.</p> <p>The University San Carlos de Guatemala's Political School has been a key ally. Its sponsoring of the Social Audit School confers an added value to the diploma, as it is an academically recognised qualification. For many participants, this matters in terms of respectability and credibility. It also protects participants, as they can explain they attended a university programme as opposed to one provided by a controversial organisation from the government's point of view (AC).</p> <p>The SEEK Initiative also provided training on online modules on how to research corruption. This organisation focuses on due diligence, and is currently in talks with AC to do further projects together.</p>



How did the project address local needs and adapt to the country-specific context?	<p>Bottom-up engagement. Since 2015, several high-profile Guatemalan politicians were arrested, and civic space opened up enough for AC to envision political reform. However, the chapter quickly realised that legal reform needed to go hand in hand with citizen engagement in order to efficiently enact change. The situation in recent years also pointed out the limit of working only at the institutional level: corruption still happens, despite laws theoretically regulating it. The choice to work with a Social Audit School emerged from the core logic that citizens could act at least at the local level, by demanding accountability at the municipality or local authority level. This is easier to achieve since in small towns and villages, people know who the local authorities are, and the local issues (e.g. construction projects) – change can happen based on citizens knowing how to obtain the information they need to influence policy at their level. The approach was interesting: instead of focussing on lodging formal complaints, the Social Audit School enables its students to do their own research at their scale and decide whether they want to contact the probity commissions or not (in cases where the situation is more dangerous, for example).</p> <p>This new model complements the existing approach that AC has spearheaded for decades, which is the strengthening of anti-corruption and probity commissions, focusing on making legal claims.</p> <p>The work with commissions and the Social Audit School are complementary solutions, attacking corruption both through the legal procedure of making claims, and through popular monitoring and pressure on duty bearers (holding local authorities accountable through the social audit process). This is another example of SANCUS finding versatile solutions, adapting to the context to tackle a problem from several angles.</p>
Main impacts observed on institutions (oversight institutions and duty bearers)	<p>While the knowledge gained about parliament through the use of the oversight assessment tool was interesting, no impacts were seen as the relationship between the state and the chapter were antagonistic and civic space was too closed.</p> <p>The project came at the right time, since with the elections of August 2023 the political landscape will finally open a window of opportunity in which social audits and citizen actions demanding more accountability from the state will become a possibility.</p>



<p>Main impacts observed on citizens and right holders</p>	<p>The Social Audit School has collaborated with a diverse group of stakeholders including women, students, indigenous leaders and media personalities at the local level. Its main impact was the creation of a healthier ecosystem for social auditing processes. For example, in Chiquimula, 200 individuals were trained, many of whom are key stakeholders involved in CSOs, the university, or the probity commission. Thanks to the training received, these beneficiaries will be ready to attend the “anti corruption roundtables” announced by the elected government (from January 2024).</p>
<p>Main impacts observed on the network (allies, CSOs, journalists)</p>	<p>Allies hold AC in high esteem, as the organisation has the reputation of being a steady and reliable actor in the fight against corruption.</p> <p>Several journalists were also trained (60 in 2022) and mentored. The main beneficiaries are independent individuals who publish on their own social media platforms, or work for a local community radio. They have an expansive local network and followers but have not been trained formally as reporters. Yet, they play a significant role in how information is disseminated at the local level, and the training provided by TI helped them understand themes such as security protocols, or how to mobilise information from local authorities.</p> <p>The local Transparency and Probity Commissions explain that the school enabled them to expand their network. In Antigua, the head of the Commission has been able to liaise with several collectives focusing on advocacy at the local level, including academics, community leaders, journalists and representatives from the local government.</p>
<p>Main impacts observed on marginalised groups</p>	<p>The Social Audit School targeted citizens and CSOs in eight regions of Guatemala. Marginalised groups are a key target of the training programme, in particular gatekeepers who can relay the information within their local communities (indigenous leaders, CSO representatives, etc). Overall, of the 510 participants; 301 women were trained (59%), 272 young people between the ages of 15 and 29 (53%), 227 Indigenous people (44%) and 157 members of the rural population (30%).</p> <p>To cite but one example, in the 2023 class, out of 214 participants, 158 were women, 129 were young people and 109 were indigenous people. Some individuals were also representing collectives, such as 5 women CSOs, 2 indigenous organisations, and 4 youth organisations.</p>



	<p>We had the opportunity to interview representatives from 3 CSOs. Two were women organisations in Chiquimula, the Red Centroamericana de Mujeres las Tinajas and the Red de Mujeres de Chiquimula. They report a significant change in their confidence to carry out their own social auditing, and have plans to do so (for example at the CSO representation office within the Ministry of Development’s regional branch). Prior to the school, the prospect was daunting as social auditing can be technical and requires familiarity with several online platforms. They consider that even in cases where it can be dangerous to lodge a formal complaint, they now have at least the opportunity to research and document what is happening, on which they can act later (for example during elections).</p> <p>Women said the Social Audit School included GESI considerations to a certain extent, but could go further to ensure that the examples given through the training focused on issues affecting activities traditionally assigned to women (for example, health and education rather than infrastructure projects).</p> <p>The school had a multiplying effect, as the participants relayed their knowledge back to the organisation. This was the case with another CSO we interviewed, SANIK (in Sacatepéquez), which is led by a young indigenous woman who participated in the School. SANIK transmitted the information to 15 people from the local community of San Antonio, some of whom started to request information at the municipal level. This was unprecedented, as the community is normally conservative and does not normally openly discuss themes such as corruption.</p>
Main impacts observed on the local TI chapter (tools, knowledge, networking with other chapters at the regional and global levels)	<p>Thanks to the flexibility of SANCUS, Acción Ciudadana was able to pilot the Social Audit School, a project which it had envisioned for a long time.</p> <p>The chapter has received training on databases, surveys, and budgeting, as well as support on working in difficult contexts.</p> <p>The Guatemala ALAC was also somewhat involved: it acted as a resource that SANCUS could use when it needed to provide help to citizens in terms of making formal complaints.</p>



	<p>The chapter was not much involved in regional collaboration, although it took part in the training events and webinars disparted by TI Chile. One key exception is found in the meeting organised around ALAC work in Colombia, co-organised with Colombia and Chile. However, the idea for this meeting predated SANCUS.</p>
<p>What is the specificity of the SANCUS approach in this country? How does it differ from other countries (context, needs, target communities)? How did this affect the implementation of activities?</p>	<p>Focus on the Social Audit School</p> <p>Due to the political situation, it was impossible to engage with duty bearers and the TI staff had to revise their expectations. They carried out the parliamentary oversight assessment, but this was done in a limited capacity – the tool was interesting, but did not correspond to the needs of the chapter on the ground. The Social Audit School was a novel approach, and only one other chapter (TI Maldives) had a similar project, although to a lesser extent.</p>
<p>What were the challenges encountered?</p>	<p>Budget and staffing arrangements</p> <p>The project was conceived in February 2021 but did not start until July 2021, when the funds were received. There was a slight delay in the beginning.</p> <p>While the budget covered the salary of two/ three full time staff members (at different times), in reality most of Acción Ciudadana’s staff got involved in SANCUS at some point.</p> <p>The fact that not enough was budgeted for staff salaries was an issue – for example, the MEAL specialist could not support on SANCUS as much as was planned, and the project coordinator ended up doing most of the MEAL reporting.</p> <p>The budget was deemed limited, especially considering the amount of field visits required by the Social Audit School, and the inflation witnessed in Guatemala during the period of implementation, which meant that activities costed more than budgeted.</p> <p>Inflexibility of the budget</p> <p>Some of the activities, such as journalists interviewing sources, required a degree of confidentiality which couldn’t be guaranteed under the EU reporting guidelines for spent funds (e.g. lists of participants). This meant that these</p>



	<p>activities were unbudgeted or paid by other projects. The work done by partners on SANCUS was sometimes achieved through mutual favours but was not budgeted. This led to the inability to carry out much work on the horizontal axis of the project, as the targets for the amount and scope of activities was very ambitious considering the project’s limited means.</p> <p>Adverse political situation</p> <p>The threats made by the government against AC and its staff resulted in an application to TI’s Emergency Security Grant, which helped them hire lawyers and protect the ALAC archives.</p> <p>Issues with the co-applicant model</p> <p>At the Latin American level, the role of TI Chile was not clear, and the status created parallel lines of reporting. Ultimately, it was easier for AC to communicate directly with the Secretariat than for TI Chile to relay their queries, since that could add a delay of several days.</p>
What solutions did the team and partners come up with?	<p>Rearrangement of the activities</p> <p>Initially, AC was also supposed to work with municipalities: through the monitoring and social audit process, the project hoped to mentor CSOs in negotiating with local authorities towards policy change. This work could not happen because of the political tensions that occurred, handcuffing AC’s ability to act at the government level. Rearranging was still challenging, however, due to the short time for project implementation (2 years).</p> <p>Asking for favours</p> <p>AC mobilised its extensive network to help deliver teaching modules, which they did based on the opportunity they saw. These teachers were largely working on a voluntary basis.</p>



What are the key lessons for TI Secretariat?

- The activities developed as part of the Social Audit School were praised by all participants, but they would have valued **follow up monitoring of the participants**.

This would have helped them to brush on their abilities and obtain continuous mentoring/support, but also for AC to know whether the school had any concrete impacts or whether it resonated more with specific groups. These data would be important for them to be able to replicate and expand on the experience.

- AC would be interested in **scaling up the social audit experience**, teaching the course in countries of the region facing similar issues.

Currently, the chapter is considering mentoring the TI chapter in Bolivia to conduct their own Social Audit School, with funds from the government of Spain.

- **Stories of change**

Allies such as the Centro Carter recommend that TI disseminates Stories of Change to give concrete examples of the differences their projects make. This would reinforce the reporting on the project, but also act as publicity for the chapter to be able to obtain more subsequent funding and turn the Social Audit School into a permanent feature of the National Chapter.

- **More communication between TI and the National Chapters** to learn from their experiences on the ground.

AC's message to the Secretariat is that their experience of the local context may lead them to adopt a bespoke approach (in this case, the Social Audit School): the chapter encourages the Secretariat to listen to their experience and reflect on what can be applied to others more broadly.



4.4.2. Kenya

Implementing chapter	Transparency International Kenya (TI-K)
What activities have they carried out?	<p>As part of the SANCUS project, TI-K implemented a wide range of activities, from capacity building to advocacy. These activities took place at both national and regional levels, as TI-K was one of the 4 co-applicant chapters in this project.</p> <p>More specifically, TI-K's activities took the form of workshops and webinars, organised both with the partner civil society organisations and with the oversight institutions involved in the project. These activities were designed to train participants in the political and practical issues of horizontal and vertical accountability: the aim was to provide a better understanding of the rights of citizens, the duties of elected representatives (parliamentarians and members of government) and the remedies available in the event of disputes and suspicions of corruption at local level, as well as finding synergies of action between the various chapters.</p> <p>TI Kenya also carried out advocacy activities: forums were organised bringing together different members of the TI-K network at national level. The activities carried out therefore ranged from access to information (access to budget reports, for example) to understanding these reports and other technical documents, while also dealing with issues linked to these questions, such as the operation of public services and the role of taxes and how they are used. The training provided focused more specifically on ways of responding to the lack of information, and therefore aimed to teach participants how to draft petitions aimed at elected representatives. By involving civil society organisations in these training courses, the aim was to indirectly target citizens, with a view to spreading knowledge.</p> <p>For external partners, such as journalists, the training focused on understanding official documents (budget reports at county or national level), but also on the role of elected representatives, or on fact-checking and how to identify gaps in published data.</p> <p>At regional level, face-to-face or online workshops were organised with various Sub-Saharan African National Chapters involved in the project. These workshops focused on Parliamentary Oversight tools and aimed to find synergies of action between the different chapters.</p>
Target beneficiaries	TI-K's target beneficiaries for this project are rights holders, investigative journalists, civil society organisations and oversight institutions.



<p>Key allies</p>	<p>To reach citizens more easily, particularly marginalised populations (especially in rural areas or on the outskirts of Nairobi), the key allies were civil society organisations and in particular citizens' action groups such as the Kawangware Youth Paralegal Trust (KAYPAT) or the Kenya National Alliance of Street Vendors and Informal Traders (KENASVIT). These groups, with their strong links to the field, had access to local citizens and populations, and were therefore able to create a link between TI-K and local populations. In addition, and given the difficulty TI-K had in making contact with parliamentarians, organisations such as the African Parliamentarians Network Against Corruption (APNAC) and the Office of the Auditor General (OAG) were particularly useful.</p>
<p>How did the project address local needs and adapt to the country-specific context?</p>	<p>In addition to aligning the project with TI-Kenya's strategic focus areas, a comprehensive assessment was conducted to identify ongoing engagements that warranted sustainability. The aim was to ensure that the project not only addressed immediate concerns but also had a lasting impact beyond its duration. This involved a meticulous analysis of existing initiatives and collaborations to determine which aspects should be maintained and integrated into the project's framework for a sustainable approach. Furthermore, the project sought to leverage and integrate existing information and valuable input from stakeholders, including insights from APNAC and Mzalanda, longstanding partners of TI-K. Harnessing this wealth of knowledge and experience allowed the project to benefit from lessons learned and best practices gathered from prior engagements. It provided a foundational understanding of the dynamics, challenges, and opportunities within the project's scope, enabling the formulation of informed strategies and decision-making</p>
<p>Main impacts observed on institutions (oversight institutions and duty bearers)</p>	<p>The institutions were able to develop their networks, but also their range of activities, and therefore developed certain skills during the SANCUS project. For example, Mzalando, which is initially a monitoring organisation, was able to take part in the Parliamentary Oversight Assessment activities. Thanks to the work carried out with TI-K, the organisation was able to take part in joint activities with the OAG, but also with the Investigative Journalists, for whom they developed a tool alongside TI-K. Similarly, AOG was able to develop and map civil society organisations with which it could collaborate on government monitoring and oversight activities, and was also able to establish direct contact with citizens, notably through the drafting of the Citizens Accountability Audit (CAA). In addition, by working with TI and with citizens, they were able to learn about issues of vertical accountability and develop a better understanding of these problems, which are directly linked to horizontal accountability issues.</p>



<p>Main impacts observed on citizens and right holders</p>	<p>According to organisations that have worked directly with citizens, such as KAYPAT and KENASVIT, the direct impact on citizens lies in their understanding of their rights and the duties of elected representatives. The SANCUS project enabled them to develop a better understanding of the political system, and of the influence they could have on parliamentarians as citizens and beneficiaries. Similarly, this political awareness would have had a secondary impact on their behaviour by encouraging them to get involved in public participation processes, as well as drafting petitions aimed at elected representatives at local and national level.</p>
<p>Main impacts observed on the network (allies, CSOs, journalists)</p>	<p>The primary effects observed within the network of CSOs, allies and journalist include skills related to both vertical and horizontal accountability, understanding of the country's political challenges, the ability to identify gaps, analyse data, and assess government-provided documents. Additionally, there is a focus on networking with other institutions in the country, engaging in collaborative activities, sharing expertise, capacity building on corruption-related topics, and gaining a deeper comprehension of the issues at hand.</p> <p>For example, Mzalando was able to participate in the creation of a tool for Investigative Journalists, as well as in their training. Similarly, KENASVIT was able to participate in the drafting of the Citizens Accountability Audit developed by the OAG. At regional level, APNAC has also been able to implement joint activities and peer learning with Rwanda.</p>
<p>Main impacts observed on marginalised groups</p>	<p>The key effects noted on marginalised communities encompass bringing attention to their concerns, incorporating their perspectives into discussions, providing a platform for them to voice their experiences, and ensuring that the issues pertinent to them are prominently featured in reports.</p>
<p>Main impacts observed on the local TI chapter (tools, knowledge, networking with other chapters at the regional and global levels)</p>	<p>TI-K already had a good network at national level but, through this project, was able to develop its ties and collaboration with citizens and local populations, both within Nairobi and in outlying areas, thereby growing its network and therefore its impact.</p> <p>At regional level, it has been able to collaborate with other National Chapters, particularly in its role as co-applicant chapter, and thus once again develop its network. Moreover, peer learning engagements and sharing experiences among the participating chapters played a crucial role in enhancing the strategies and best practices adopted within the project in Kenya. The collaborative knowledge-sharing sessions facilitated a dynamic exchange of ideas and experiences, allowing for a deeper understanding of effective approaches. One notable instance of this collaborative learning was the incorporation of reform recommendations aimed at enhancing the independence</p>



	<p>and accountability of Constituency Development Offices (CDOs). Insights and lessons drawn from similar initiatives and experiences in Zambia were particularly instrumental. By examining the successful strategies implemented in Zambia, the project in Kenya gained valuable insights into measures that could effectively strengthen the independence and accountability of CDOs.</p>
<p>What is the specificity of the SANCUS approach in this country? How does it differ from other countries (context, needs, target communities)? How did this affect the implementation of activities?</p>	<p>As part of this project, TI Kenya was one of the chapters that worked on both the vertical and horizontal axes. They have therefore carried out activities directly affecting oversight institutions, but also citizens. The implementation of these two axes is based on Kenya's socio-political context, in which oversight institutions are already formally established (OAGs), but where it is also possible to communicate and take action with parliamentarians. TI K's uniqueness lies in its excellent national network. The organisation has long-term partnerships with several organisations involved in this project (APNAC, Mzalando), as well as informal links that have helped to solidify the implementation of the activities and therefore the project as a whole. This particularity has also played a significant role in the implementation of activities at regional level: as co-applicant chapter, TI-K has used its national network to extend its activities at regional level, and create bridges between Kenyan organisations and African chapters.</p>
<p>What were the challenges encountered?</p>	<p>Firstly, insufficient funding posed a significant challenge for implementing a comprehensive range of activities. This limited the team's ability to carry out all intended actions and initiatives as initially envisioned.</p> <p>Secondly, the project faced strict timelines, making it challenging to adequately plan and execute activities. Balancing efficient progress with the need for thorough planning was a persistent struggle.</p> <p>Thirdly, managing responsibilities at both the regional and national levels was intricate and demanding. It required effective distribution of tasks and resources to ensure smooth operations on all fronts.</p> <p>Finally, due to time limitations, consulting with stakeholders was constrained. This hindered the ability to gather diverse perspectives and insights crucial for project success. In terms of external factors, the onset of the COVID-19 pandemic significantly impeded the initial phases of the project. The strict public health measures and restrictions imposed to curb the spread of the virus disrupted planned activities, hindered travel, and limited face-to-face</p>



	<p>interactions. This necessitated a swift and comprehensive re-evaluation of project timelines and operational strategies to accommodate the new reality and ensure the safety of all involved.</p> <p>Simultaneously, Kenya underwent a pivotal political transition marked by a change in parliamentarians. This shift brought about changes in key decision-makers and policy influencers. The altered political landscape shifted the project's focus from a primary concern on addressing corruption to a heightened emphasis on election-related matters. Consequently, the project had to swiftly readapt its approach and strategies to align with the evolving political priorities and establish effective engagement with the new set of parliamentarians. It was essential to reassess advocacy plans and target audience engagement, ensuring that the project's objectives remained relevant and impactful within this altered political context.</p>
What solutions did the team and partners come up with?	<p>To cope with resource constraints, activities were strategically downsized while still maintaining their core objectives. This approach ensured that the project could make the most out of the available resources without compromising impact. Funds were carefully managed and redirected if not fully utilised for a specific activity. This ensured that every allocated fund contributed effectively to the project's goals, addressing areas that required additional support.</p> <p>Despite limited stakeholder consultation time, the team capitalised on their prior experiences and knowledge from similar projects. This informed decision-making and provided valuable insights, compensating for the lack of extensive consultation.</p>
What are the key lessons for TI Secretariat?	<p>To optimise the successful implementation of a comprehensive project, several key aspects warrant careful consideration.</p> <ul style="list-style-type: none"> • Securing a more substantial budget is paramount to expanding the scope of activities and enabling the hiring of additional staff. <p>This would effectively mitigate excessive workloads, ensuring that each team member can contribute effectively and efficiently. Moreover, a well-funded project provides the necessary resources for robust execution and the ability to navigate unexpected challenges.</p>



- **Extending the project duration to, for instance, five years** allows for a more extensive inception phase.

This prolonged inception period is crucial for a comprehensive understanding of stakeholder needs and priorities, enabling a more precise project design. Additionally, a longer timeframe affords ample opportunities for thorough stakeholder engagement and the thoughtful planning and execution of advocacy strategies. A well-structured inception phase is foundational to project success, paving the way for effective implementation.

- **Fostering deeper engagement** with a broader array of stakeholders at the regional level is fundamental to achieving a holistic project.

Collaborating closely with various stakeholders facilitates a more comprehensive understanding of the multifaceted issues at hand. Their diverse perspectives and expertise contribute to a well-rounded project strategy, enhancing its potential impact and sustainability. This collaborative approach is essential for addressing the project's complexity effectively and meeting the needs of all involved parties.



5.5. Appendix 3: ToR

STANDARD TEMPLATE FOR TENDERS

GENERAL INFORMATION

Title of Consultancy: End-of-project evaluation: SANCUS project

Application Closing Date: 14/05/2023



Consultancy Start and End Date: 1st June – 30th November 2023 (35 working days)

Location of Consultancy: Remote, with potential travel to one or two participating countries

BACKGROUND

Transparency International (TI) is the global civil society organisation leading the fight against corruption. Through more than 100 chapters worldwide and an international secretariat in Berlin, Germany, TI raises awareness of the damaging effects of corruption and works with partners in government, business, and civil society to develop and implement effective measures to tackle it.

The Transparency International Secretariat (TI-S) in Berlin is seeking a consultant or team of consultants to conduct the end-of-project evaluation of the [Strengthening Accountability Networks among Civil Society \(SANCUS\)](#) project to provide an external and independent review of the project's performance and achievements.

The project aims to contribute to greater democratic accountability of public institutions globally, specifically by empowering civil society organisations (CSOs) to demand systemic change to address accountability and anti-corruption deficits in 26 countries over 36 months. The SANCUS partners include eight national CSOs from sub-Saharan Africa (Cameroon, Rwanda, the Gambia, Madagascar, Nigeria, Kenya, Zambia and Zimbabwe), eight from Latin America and the Caribbean (Brazil, Chile, Colombia, Guatemala, Jamaica, Honduras, Panama, and Peru), four from the Middle East and North Africa (Morocco, Lebanon, Jordan and Palestine), four from Asia Pacific (Cambodia, Sri Lanka, Indonesia and Maldives) and two from Eastern Europe and Central Asia (Armenia and Bosnia and Herzegovina).

The action adopts a two-lever approach to enhance democratic accountability, with each national project team implementing activities to strengthen:

vertical accountability: the means by which the state is held to account by citizens and their associations

horizontal accountability: the means by which one state actor has the formal authority to demand explanations or impose penalties on another body as part of intra-governmental checks and balances

The expected outputs and outcomes are as follows.

Outcomes	Outputs	
(1) Network building: CSOs and rights holders are more effectively mobilised to demand greater accountability and integrity through increased visibility, strategic advocacy and broad networks.	(1) A network of CSOs undertakes sustained peer-to-peer sharing of expertise, knowledge and collective advocacy strategies.	(4 – supporting outcomes 1-3) Enhanced capacities of CSOs to utilise digital tools in advocacy, monitoring, legal protection and participation of marginalised citizens.
(2) Vertical accountability: CSOs meaningfully engage duty bearers in consultations, redress mechanisms, as well as in the monitoring and scrutiny of their responsiveness throughout the policy and budget cycles.	(2) Strengthened protections, knowledge, tools and technical capacity of CSOs to demand accountability from and counter corruption of duty bearers as well as strengthened relationships between public sector and civil society.	
(3) Horizontal accountability: CSOs more strongly advocate for enhanced parliamentary oversight, as well as stronger democratic accountability institutions and mechanisms, based on systematic monitoring and public reporting on their performance, using digital technologies.	(3) Enhanced standards, guidelines and monitoring tools/systems to regularly report on parliamentary oversight and oversight agencies' performance.	

Ultimately, rights holders, individuals and communities, including marginalised groups that are particularly impacted by corrupt acts, will be the final beneficiaries of increased democratic accountability for the sectors and services targeted by each SANCUS work plan.

OBJECTIVES

The main purpose of the evaluation exercise is to provide an external and independent review that assesses the project's performance and achievements and contribution to any positive or negative changes. The assessment should generate key lessons learned that can inform the set-up and direction of future work.

The overall objectives of the evaluation are the following:

Provide an independent systematic and objective assessment of the achievements of the objectives and outcomes as specified in the project and the extent to which the project has contributed to this impact.

Identify weaknesses and strengths in the project's strategy (including underlying assumptions and results chain) design and implementation with regard to achieving and sustaining expected results and driving innovation and learning across the network.

Document lessons learned and good practices to generate clear forward-looking and actionable recommendations to guide TI-S and National Chapters and other stakeholders in developing strategies for future related work at national, regional and global levels.

A key audience for this evaluation is the TI Secretariat and Chapters who will use the results to inform the design of future related projects. The EC may use the evaluation for accountability and verification purposes.

KEY ISSUES TO BE ADDRESSED

The following questions could be addressed during the project evaluation but are subject to discussion and agreement with TI-S during the period of designing the evaluation approach. The evaluator is free to further prioritise these questions in the proposal and suggest others as deemed necessary.



Relevance/Coherence:

Did the project respond to the needs and/ or strategies of key stakeholders and institutions at national, regional and global levels? This includes the TI strategy and EU priorities, with a particular focus on the project's approach to localisation.

How relevant has SANCUS been in the wider context of the fight against corruption/strengthening of democratic accountability? What have been the synergies and interlinkages with other major civic-led accountability interventions, and other relevant EU-funded projects? To what extent is the project's theory of change coherent, valid and relevant – were the underlying assumptions correct?

Impact and effectiveness:

What are the key changes (positive as well as negative) achieved so far by the project either directly or indirectly? Has the programme generated unintended changes?

In which ways did this project improve the capacity of the SANCUS networks to effectively mobilise to pursue advocacy on democratic accountability issues, meaningfully participate in policy and budgetary processes, and monitor oversight institutions? What have TI-S and National Chapters learned about their levers and limits to bring about change that can inform future approaches?

To what extent can the articulated results chain be assessed as an/the most effective route towards the expected results? Was the theory of change effective?

What difference have the project achievements made so far to the beneficiaries, including marginalised groups? Have the inclusion approaches in place to promote the participation of women, youth, marginalised communities, and underrepresented groups in anti-corruption initiatives been effective?

Sustainability

To what extent are the results/outcomes - including changes in the capacity of communities, institutions and chapters, and new networks established - of the project likely to continue (self-sustain) after the project has ended?

What are the major factors that will influence the sustainability and resilience of the achieved results/outcomes from the project?

What are the opportunities for wider scalability of tools and approaches developed under this project, within and beyond the TI Movement?

Efficiency

- To what extent has the set-up of the project and the number of partners and subgrantees ensured an efficient and effective use of resources?

METHODOLOGY

The end-project evaluation will be planned and conducted in close consultation with the TI-S Monitoring Evaluation and Learning (MEL) Unit and the SANCUS project team. The consultant is ultimately responsible for the overall methodological approach and design of the evaluation and consultation process and is expected to propose methods that they consider most appropriate to achieve the aims. The evaluation approach and methods must be agreed with the TI-S MEL Unit and the SANCUS project team. The SANCUS project team will provide the necessary support, including submission of all documents for desk review. The evaluation should use a participatory and gender-responsive approach engaging relevant staff at TI-S and National Chapter levels, stakeholders, and beneficiaries through structured methods. Both quantitative and qualitative data should be utilised in assessing the project.

The end-project evaluation should include but not necessarily be limited to the following methods:



Desk review of relevant documents
Survey to TI internal and external stakeholders
Individual and/or group interviews with internal and external stakeholders
Case studies

TI-S encourages the consultant to suggest additional approaches and methods that could further strengthen the quality of data and/or close any data gaps identified.

The consultant is expected to refine the scope and methodology of this assignment during the inception phase in cooperation with TI-S and provide a detailed plan. The consultant should present a detailed statement of the proposed review methods in the technical proposal.

EXPECTED DELIVERABLES AND TIMELINE

This evaluation is expected to be mostly desk-based, conducted remotely with a maximum allocation of 35 working days. There may be travel to one or two participating countries, to be agreed during the inception phase in consultation with the TI-S team.

The consultant or team of consultants are expected to submit an evaluation report that documents the evaluation process and results following a clear structure. The evaluation report will contain the findings, conclusions, and recommendations as well as a recording of the lessons learned. The report will be written by the evaluation expert.

The consultant or team of consultants will initially prepare a draft report, which will be discussed with TI-S. While considering the comments provided on the draft, the evaluation expert shall use their independent and impartial judgment in preparing the final report.

The final report should not be longer than 40 pages, excluding the annexes and the executive summary, and should be accompanied by a summary power point presentation. Annexes to the final report should be kept to an absolute minimum. Only those annexes that serve to demonstrate or clarify an issue related to a major finding should be included. Existing documents should be referenced but not necessarily annexed.

In sum, the main expected deliverables are:

Detailed concept note and work plan, incl. approach, methodology, evaluation questions, survey/interview questions, list of stakeholders and detailed timeline.

Draft report for fact checking and comments by TI-S, including annexes covering conducted interviews, results of questionnaires and list of reviewed documents.

A validation meeting with key stakeholders to discuss findings and feedback on draft report.

Final evaluation report, including clear lessons-learned and recommendations, with a summary power point presentation.

Guidance and quality assurance:

The findings should be referenced.

The consultant's approach should be guided by the Transparency International Impact Matrix methodology

(https://www.transparency.org/whoweare/accountability/impact_monitoring/4).

The research should abide by ethical protocols including participant confidentiality and privacy if they require that.

All presentations and reports should be submitted in English, in electronic form, in accordance with the deadlines stipulated above. The consultant or team of consultants is responsible for editing and quality control of language. The final report should be presented in a way that directly enables publication, and online accessibility as far as possible. The TI Secretariat retains the sole rights with respect to all distribution, dissemination, and publication of the deliverables.



SELECTION CRITERIA

The consultant or team of consultants should have the following qualifications:

University degree in social sciences or a related area. A post-graduate degree in project management related fields would be an advantage.

At least seven years of proven relevant professional experience in an international development environment, of which at least five years should be in Monitoring & Evaluation of multi-country projects & programmes.

Substantial experience in conducting evaluations, including in the anti-corruption/ democratic accountability field.

Knowledge and experience of working for advocacy-oriented organisations.

Excellent drafting and report writing capacities, with excellent command of English.

Highly motivated and committed to the values of transparency and integrity.

Experience working on global projects and good understanding of political, socio economic and human rights issues in the countries involved in the project or subregions the countries belong to.

Experience working in multicultural environments.

Demonstrable experience of evaluating approaches to inclusion in programmatic and project delivery.

Availability to carry out the work in June-November 2023.

Desirable experience:

Experience in monitoring and evaluation of EU-funded projects.

Experience working on projects including 20+ countries.

Familiarity with the activities and procedures of TI-S and TI National Chapters is an advantage.

Experience in results-based programmes/ project management approach. ▪ Knowledge of good governance and anti-corruption issues.

Working language:

The working language will be English.

Knowledge of Spanish, French and/or Arabic is an advantage.

REMUNERATION AND COSTS

The Consultants should provide their estimated total fee as a lump sum or as standard daily or hourly rates.

For candidates based in the EU, EEA, UK, and Switzerland

Transparency International e.V. (Secretariat), (TI-S) is registered as a Business Entity in Germany with VAT identification number DE273612486. EU reverse charge applies. Service providers should issue invoices with zero VAT.

Candidates who are based in Germany and do not charge German VAT must confirm their small entrepreneur status.

HOW TO APPLY

The application should include the following documents in English:



A letter of motivation, specifically focusing on concrete examples relating to what is requested in these Terms of Reference regarding the necessary skills and experience.

A detailed technical proposal of how the assignment will be approached.

An indicative budget and detailed timeline.

Curriculum Vitae.

At least one sample of relevant previous work (confidentiality guaranteed).

Contact details for at least two independent referees with in-depth and proven knowledge of the applicant's expertise and relevant work experience relevant for this assignment.

Please indicate "Evaluation SANCUS" in the subject line of your email application. Applications should be sent in English by email to Alice Gracy at evaluationsancus@transparency.org by close of business of 14/05/2023.

Please note that only shortlisted applicants will be contacted.

The Transparency International Secretariat is committed to creating an inclusive work environment where diversity is valued and where there is equality of opportunity. We actively seek a diverse applicant pool and therefore welcome applications from qualified candidates of all regions, countries, cultures, and backgrounds.

Selection of candidates is made on a competitive basis, and we do not discriminate based on national origin, race, colour or ethnic background, religious belief, sex, gender identity and expression or sexual orientation, marital or family status, age, or ability. We kindly ask applicants to refrain from including in their application information relating to the above as well as from attaching photos.

Data protection

When you respond to this tender and submit your application, you provide consent that Transparency International e. V. keeps your application materials for the period of ten years according to German legal requirements. Afterwards Transparency International will delete your application and any personal data included in it. If you have any questions, please reach out to dataprotection@transparency.org

Guidelines for handling overhead and travel expenses

Overhead

Regular overhead expenses associated with the Consultants maintaining their place of business, such as rent, telephone, utilities, or stationery, are included in the Consultant's professional fee, except where explicitly agreed otherwise in the contract.

Travel

Travel and accommodation expenses will as far as possible, and where applicable, be recovered from the institutions and companies hosting events or using the outputs provided by the Consultant.

Where such cost recovery is not possible, all travel is subject to prior approval by TI-S staff responsible for the financial management of the Project or TI Budget Line that will support the costs of travel. TI shall not issue travel advances to the Consultants. For accommodation or travel by air, rail, or coach, they will instead have to contact TI-S that will make travel arrangements on the Consultant's behalf.



All travel booked by TI-S will include travel health and accident insurance with worldwide coverage and Economy class only; accommodation will aim to achieve best value for money up to a 4-star category.

Consultants shall be entitled to invoice TI-S only for local transportation and visa cost (if applicable).

Subsistence allowance (per diems) and expenses for individual meals cannot be claimed. These are part of Consultant's business expenses.