End-term Evaluation
Transparency International
“Empowering civil society and citizen engagement for transparency and accountability” (‘Sharaka2’)

Final report | Brussels, 22 March 2021
EXECUTIVE SUMMARY

About the programme

Transparency International (TI) is a Berlin-based non-profit international non-governmental organisation (INGO) committed to tackling global corruption, strengthening transparency, and preventing criminal activities arising from corruption across the world. Sharaka2 is a regional project implemented in Jordan, Morocco, Lebanon and Tunisia which has a duration of two years and four months (September 2018 – December 2020). At the time of finalising this report, TI-S is concluding the work of the cost-extension granted by the donor in December 2020, extending to January-March 2021.

Transparency International’s partner in Palestine, AMAN-Coalition for Integrity and Accountability, has established in 2010 a coalition of civil society organizations from various sectors to collectively monitor the management of public funds. The Civil Society Team for Monitoring Budget Transparency (CSTMBT), which was running in its third phase at the start of Sharaka2, has made significant achievements in establishing a stronger social accountability vis-a-vis the government’s budgets and spending, prioritizing public expenditures and advocating for better fiscal policies. Sharaka1 and Sharaka2 are building on insights from this coalition to reproduce the approach in other contexts in the MENA region.

While the first iteration of the programme Sharaka 1 (2015-2018) concentrated on legislations and institutions strengthening to “[foster] public finance integrity and asset recovery”, Sharaka2’s objectives shifted towards public participation and advocacy:

1. Enable civil society’s participation in state budget preparation, implementation and monitoring of public funds including promotion of concepts of transparency and accountability to ensure optimum utilization of the public budget for meeting national needs and priorities.
2. To promote legislative and policy reforms as well as enforcement and implementation of these reforms in budget transparency, procurement, access to information, and whistle-blower protection.
3. To strengthen citizens’ engagement, encourage use of accountability mechanisms, and empower them to report on cases of corruption in the public and private sectors” (Narrative Draft Proposal 2018).

Through these objectives, Sharaka2 aimed to create participatory state budgets where civil society coalitions (representing various sectors) in Jordan, Lebanon, Morocco and Tunisia participated in public budget preparation and tracking of public expenditures; and to promote social accountability where citizens are empowered to report on corruption and hold their governments to account. The programme has supported the operation of Advocacy and Legal Advice centers (ALACs) in the four countries, with an aim to empower individuals, families and communities to safely report corruption when they see it happen. The total budget of the programme was EUR 1,930,314 in the original contract. The programme was funded by the German Federal Foreign Office.

About the evaluation

The end-term evaluation of Sharaka2 was conducted by ODS (Veronika Horvath, Lama Alarda, Hande Taner) as core evaluation team and Luckystar Miyandazi (ECDPM) as independent expert on public finance sytems. The evaluation relied on Internal and external key informant interviews (a total of 32 interviews), an in-depth briefing with TI-S and a review of project documentation. The evaluation took place between September 2020 and January 2021, with reporting between January-March 2021. The evaluation followed four OECD-DAC criteria (Relevance, Effectiveness, Efficiency, Sustainability), which were translated into granular research questions.
Findings from the evaluation

Relevance

- The programme has taken into account the political and social context in all 4 Chapters, and has made several adaptations to emerging challenges to allow for supporting response to new situations such as the 2020 explosion in the Port of Beirut, or Covid-19. This has ensured a high level of relevance.
- Sharaka2 is relevant to the donor’s (German MFA) priorities in the region. The focus of the programme on strengthening the accountability of public bodies and strengthening civil society is aligned with the analysis of the donor on the barriers to democratisation in the region. As such, Sharaka fits well with the broader goals of strengthening the rule of law and institutions - transparency, accountability and public debate, together with strengthening the knowledge base on participatory governance.
- LTA’s advocacy priorities are aligned with those from major financial institutions and donors to the Lebanese government, which make the programme strongly relevant, at least in terms of transparency. Likewise, budget Transparency is one of the main pillars of the open government programme of Morocco under the Open Government Partnership. TI Morocco plays a role under the OGP structure as part of the Steering Committee of the OGP Action Plan. This development was a key driving force behind CSO action for transparency in Morocco since 2018. Therefore, the Chapter is closely associated with government transparency policies.
- Donors and financial institutes rarely include participatory budgeting among their requirements, which has meant that the Chapters saw less policy platforms for advocating around this priority.

Effectiveness

Overall, the programme has contributed to public engagement and keeping the issue of participatory budgeting on the advocacy agenda. The most visible main contribution is connected to TI’s mission of being a voice of expertise on corruption who can carry the message in an otherwise restrictive context, where few other CSOs do comparable work. This role was felt to be relevant in all national contexts by TI and the donor.

This is a significant outcome in the context of Covid-19, where the attention of decision makers and the public was focused on public health.

The intervention channels with most significant outcomes are described below.

- **Influencing policy:** The programme has contributed to influencing policies and legislation related to public policy. An example is the policies related to the management of emergency relief funds. For instance, 80% or recommendations of TI Jordan were taken up in the policies around the Hin nit Watan Covid-19 relief fund. In Lebanon, TI has contributed to important policy wins, including the enforcement of the country’s Access to Information law, despite strong political resistance; and the establishment of a national anti-corruption commission. In Morocco, in 2019, the ministry of Health published a summary of its budget accessible to citizens, in line with recommendations from TI and CSO partners. IWatch in Tunisia also saw first signs of effectiveness in steering municipal authorities towards more participatory discussions with civil society.

- **Raising citizens’ voices:** ALACs, supported by Sharaka2, have received and followed up on hundreds of cases of corruption reported by citizens. ALACs have reported a constant or growing interest from citizens in all four programme countries. For example, in 2019-2020, the Lebanese ALAC received a total of 675 calls and 623 complaints.

- **Strengthening the knowledge base on corruption and budget transparency:** The programme strengthened the knowledge base and range of tools available to CSOs interested in advocating around transparent and participatory budgeting by producing openly accessible resources in all programme countries. In Lebanon, TI has conducted investigative work on emerging issues, such as
Rebuilding Beirut and the Distribution of Aid, thus strengthening the available knowledge base on corruption. The output from these activities was used in public outreach, but it is unclear how this information was further used for advocacy. Similarly, in Morocco, TI trained 8 journalists and launched an investigation into the Covid relief fund.

- **Raising the visibility of corruption:** In all programme countries, one of Sharaka’s most visible contributions was to enable TI Chapters to carry a strong message about the importance of transparency and of combating corruption. For instance, TI Jordan’s messaging around a national law related to asset declarations for public officials were picked up by media channels and discussed intensely. Working with university students (Jordan) or youth (Tunisia) has contributed to raising the awareness of these groups about corruption.

**Limitations to effectiveness**

- Most of the limitations in understanding the programme’s contributions stem from a lack of clear objectives and monitoring. In the absence of systematic tracking and assessment of the takeup of the tools created by TI and the skills addressed in capacity building, it remains difficult to assess the effectiveness of these aspects of the programme. The programme has not articulated the goals of awareness-raising activities, which makes the assessment of their effects challenging.

- **Building networks:** the programme engaged national and local civil society in conversations around the role of CSOs in monitoring public budgets. In Jordan and Morocco, partners interviewed for this study indicated that working with TI has given them a new understanding of their role in advocating for transparent budgeting. However, it remains unclear to what extent these networks are sustainable or how the collaboration added value to TI’s corruption advocacy. In Lebanon, the TI Chapter coordinated and led the broad Mouwazana coalition, which constituted a new platform for engagement around transparency (less specifically around budgeting).

**Efficiency**

- The programme’s efficiency was limited by the relatively short timeline of the funding, and the long period of planning and recruitment that preceded the start of activities in the Chapters and TI-S. This resulted in a long startup period, ultimately affecting the breadth and depth of activities that could be implemented before the Covid-19 crisis.

- Implementation was affected by the Covid-19 epidemic. While Chapters’ engagement on policies (where these related to emergency funds) remained relevant, the need to shift other elements online has likely limited the reach and depth of outreach activities.

- Some Chapters highlighted challenges in developing the tools and resources foreseen in the programming. All Chapters felt that at times the expertise available within the team fell short of the technical knowledge needed by the project. While the programme had earmarked funds for hiring experts, these processes sometimes took longer than expected. This limitation, indicated by all Chapters, raises the question of the suitability of technical issues, such as budgeting, for advocacy in Chapters which do not have sufficient expertise to oversee and deliver key programme components.

- **TI-S** had responsibility for accountability towards the donor, assisting with budget and planning updates, coordinating monitoring and reporting and supporting learning exchange. The evaluation found that closer involvement from TI-S in structuring the programme’s Theory of Change (how the Chapters envision that their activities will lead to the desired outcome) as well as leading on implementing tools for monitoring and reporting according to outcomes (as opposed to activities) aligned with the TI Strategy, would have added considerable value to the programme. TI-S efficiency was limited by staff shortage (for instance gaps between staff on long-term leave and recruitment of their replacement) and the high level of flexibility in adjusting programme budgets and activities—which in turn required considerable time to administrate.
Sustainability

TI Chapters are highly likely to continue advocating for more transparent public policies and for combating corruption. ALACs are also highly likely to continue their work in supporting and representing citizens in taking action against corruption.

It is not clear whether Chapters will continue engaging on transparent and participatory budgeting in the absence of targeted funding.

The review found that CSOs partners’ interest and ability to advocate for transparent and participatory budgeting is limited in all countries. Engaging with partner networks has been challenging for all Chapters. Therefore, the sustainability of partner networks will likely continue to rely on investment from TI.

Challenges in the political context for TI’s work have affected the programme in all countries and will likely continue to do so. Stakeholders in several Chapters expected that the political environment is expected to become more restrictive for anti-corruption activism. TI will therefore likely need to adapt its strategies and accountability structures.

Recommendations

Relevance

1. **Theory of Change** The review recommends TI to spell out the Theory of Change for the programme, and articulate how the tools and activities performed by each Chapter in their national context are assumed to lead to the changes sought by the programme.

2. **Subject focus** Focusing on transparency as well as participatory budget-making in advocacy could therefore be a useful strategy for Sharaka2 where this is not already the case.

3. **Capacity building** The review recommends that Chapters organise a shared structured reflection, perhaps facilitated by TI-S and exchange ideas about conducting needs and capacity assessments before capacity building as well as designing, adapting, following up and assessing the effects of their interventions.

Effectiveness

4. **Engaging CSOs**: Chapters identified challenges in engaging national and local CSOs in the programme. They indicated the capacity and motivation of potential partners to engagement. The assessment recommends TI to look at this issue critically and investigate the bottlenecks in engaging with CSOs, and identify strategies to address the lack of engagement.

5. **Internal capacity**: Chapters have reported challenges due to insufficient expertise related to budget transparency and participation. This is a strategic issue that the programme and TI-S would likely need to address together. In the planning phase of programmes, Chapters would benefit from a thorough assessment of expertise in the field that each programme would cover, and whether the Chapter’s own expertise would be sufficient to oversee and deliver the expected activities. Where concerns are raised about capacity, strategic hiring should start before the internal processes are finalised to allow each Chapter to start implementation with complete teams.

6. **The** review team found that TI-S could play a role in **facilitating the exchange of expertise** which would in turn inform outputs across all Sharaka2 countries (e.g. input on campaigns and deliverables). Expertise in Chapters could be further built for future work by assessing staff skills and knowledge before programme launch; providing training on budget transparency to all TI staff; and providing context analysis (e.g. through disseminating the reports which have been prepared under the funding).

7. **The planning of campaign activities** is another challenge which affects all Chapters in MENA countries and where guidance on technical input, or risk management approaches would be needed.
8. **Adapting to online environments** The review recommends that TI Chapters, together with local partners, reviews and re-plans activities that would be put online to make up for cancellation due to Covid. This could take the form of an analysis of the goals and barriers to these events, and an adaptation that reflects the programme strategy. Instead of online meetings, TI could consider communicating through social media, printed materials, one-on-one calls with main partners, or shift attention to direct advocacy with decision makers.

9. **Timeframes** The change sought by TI takes place on a longer timeframe. The evaluation found that all programme countries had to adapt their strategies several times in the implementation period, given the volatile political context and Covid-19. The evaluation recommends TI to organise an after-action review on Covid response across Sharaka2 chapters (and beyond, as relevant) to reflect on the experiences with this adaptation and to draw insights for programming going forward.

10. **Relationship with the donor:** interviewees form the German MFA have felt that updates from TI were highly useful to their work. Establishing a close working relationship with the German Embassies in each programme country could help support Sharaka2’s advocacy objectives as well as facilitating the work of the donor. The review recommends TI Chapters in each Sharaka2 country to set up meetings on a rolling basis with their German Embassy. These meetings could be a tool to provide TI’s insights to the work of the Embassies in each country and thus support the advocacy objectives of TI. In addition, progress reports related to the funding could be provided to the contact points in the Embassy.

**Efficiency**

11. **Management** The programmes all needed several months to have all structures and activities in place. This has affected the Chapters’ ability to deliver on the activities as planned, and in turn might have affected the advocacy moments that the Chapters were able to leverage. In future iterations of the programme, we recommend a ‘start-up’ period of maximum 2 to 3 months for programmes of 24 months.

12. In each of the Chapters, complications in the **coordination between CSO groups** have led to delays and demands for adjusted timeframes. These changes were often made necessary because of Covid-19 and political instability. Lessons from responding to volatile environments could inform forward planning for the programme countries.

13. **Collaboration** between TI-S and the Chapters encountered several difficulties. The evaluation recommends an externally facilitated conversation between the internal stakeholders to define roles and responsibilities. These could be captured in an internal MoU or other agreement to which all parties sign up to.

14. **Capturing the programme’s contribution to change** has been a challenge for all programme countries. The evaluation recommends a review of the reporting template and reflection practice.

15. **The role of TI-S:** The evaluation found that closer involvement from TI-S in structuring the programme’s Theory of Change (how the Chapters envision that their activities will lead to the desired outcome) as well as leading on implementing tools for monitoring and reporting according to outcomes (as opposed to activities) aligned with the TI Strategy, would have added considerable value to the programme. Therefore, we recommend that the staff in TI-S invests time in the start-up period and throughout monitoring and reporting, in articulating expectations and pathways to change. In a programme with similar scale, this might mean that additional resources (e.g. a half- or full-time Project Assistant, or a support person with MEAL expertise) need to be budgeted for.
LIST OF ACRONYMS

ALAC = Advocacy and Legal Advice Centre
CPI = Corruption Perception Index
CSO(s) = civil society organisation(s)
CSTMBT = Civil Society Team for Monitoring Budget Transparency
GCB = Global Corruption Barometer
IBP = International Organization for Fiscal Partnership
JIACC = Jordan Integrity and Anti-Corruption Commission
LTA = Lebanese Transparency Association (TI Lebanon)
OGP = Open Government Initiative OGP
TI = Transparency International
TIS = Transparency International Secretariat in Berlin
TI-JO = Transparency International Jordan National Chapter (Rasheed)
UNCAC = United Nations Convention Against Corruption
UoJ = University of Jordan
1. INTRODUCTION AND OVERVIEW OF THE PROGRAMME

1.1 About the programme

About Transparency International

Transparency International (TI) is a Berlin-based non-profit international non-governmental organisation (INGO) committed to tackling global corruption, strengthening transparency, and preventing criminal activities arising from corruption across the world. TI’s geographic focus ranges from global to the local and their methods consist of research, advocacy and campaigning. One of their successful tools used by numerous stakeholders is their Corruption Perception Index (CPI), TI’s leading global corruption index. TI supports the empowerment of local communities through civil society anti-corruption measures, various forms of support to hold policymakers to account and exposing corrupt systems and networks. The stated vision of the INGO is: “a world in which government, politics, business, civil society and the daily lives of people are free of corruption” to be achieved through their mission “to stop corruption and promote transparency, accountability and integrity at all levels and across all sectors of society”. It is based on this vision and mission that TI develops regional projects to work with local communities and institutions in partnership with TI’s national Chapters to achieve relevant change.¹

Problem analysis

Corruption is a persistent problem that endangers the economic and social development of the region and affects the lives of its citizens. Based on the CPI, MENA countries are consistently ranked below the global average. Indeed, in 2017, only two MENA countries (UAE and Qatar) out of the 180 countries and territories scored above 50 on a scale from 0 (highly corrupt) to 100 (very clean). There are two major drivers that aggravate corruption in the MENA region as identified by TI: 1) “Weak public sector integrity, transparency and accountability, and opaque public financial management”; and 2) “Limited space of civil society, media and weak engagement of people in anti-corruption”.²

To address this context, TI’s National Chapters in the MENA region have identified social accountability as a key regional priority for 2017-2020. This falls in line with Transparency International’s key priority People and Partners in its Implementation Strategy 2020, “Together against Corruption”. According to this priority, TI will support its chapters’ efforts in creating a public demand for accountability, and to promote and protect civil society space for anti-corruption activists. An integral part in fighting corruption and establishing transparency and accountability in the public sector is to monitor how governments allocate and manage their public funds. Often citizens have no say about how their governments prioritize and spend their public budgets. Such lack of oversight further widens the gap between the citizens’ needs and the governments’ fiscal policies and expenditures, weakens participation of both citizens and civil society organizations in drawing fiscal policies as well as prioritizing the expenditures, and abates social accountability demanded from the government related to management of the budget and public funds.

Sharaka2 was set up to address these issues.³ It is a TI-S led multi-country programme implemented in Jordan, Morocco, Lebanon and Tunisia which has a duration of two years and four months (September 2018 – December 2020). Focussing on the MENA, Sharaka2 builds on Sharaka 1 by focussing more on civil society instead of legislations and institutions strengthening. Thus, where Sharaka1 concentrated on legislations and institutions strengthening to “[foster] public finance integrity and asset recovery”, Sharaka2 is titled “Empowering civil society and citizen engagement for transparency and accountability”.

¹ TI Chapters belong to the same Movement and share a Movement-wide strategy, but are independent organisations who also set their own priorities and strategies.
² TI Narrative Draft Proposal to the German Federal Foreign Office, 18 May 2018.
³ ‘Sharaka2’ is an informal abbreviation used for the programme as alternative to the long programme title, indicating the fact that the programme builds further on the achievements of Sharaka1, the first iteration.
Objectives of the Programme

The project’s three objectives are as follows:

1. “Enable civil society’s participation in state budget preparation, implementation and monitoring of public funds including promotion of concepts of transparency and accountability to ensure optimum utilization of the public budget for meeting national needs and priorities.

2. To promote legislative and policy reforms as well as enforcement and implementation of these reforms in budget transparency, procurement, access to information, and whistle-blower protection.

3. To strengthen citizens’ engagement, encourage use of accountability mechanisms, and empower them to report on cases of corruption in the public and private sectors” 4

Reconstruction of Theory of Change5

In order to pursue the three objectives, the four TI Chapters have chosen to build broad civil society advocacy coalitions, building on the positive experience of the TI Palestine Chapter with this approach in the past decade. Sharaka2 aimed to create broad civil society coalitions (representing various sectors) in Jordan, Lebanon, Morocco and Tunisia, termed “Civil Society Team for Monitoring Budget Transparency” (CSTMBT). The coalitions were envisioned to participate in public budget preparation and tracking of public expenditures; and to promote social accountability where citizens are empowered to report on corruption and hold their governments to account.

Alongside the coalition building and advocacy, the programme also supported Advocacy and Legal Advice Centres (ALACs) associated with each Chapter. ALACs, which exist in approximately 60 countries, provide free and confidential advice and support to victims and witnesses of corruption, enabling them to assert their rights, seek redress and stand up for justice. In some cases ALACs also take direct part in corruption-based proceedings. They also encourage and support people to access public information. As such, ALACs aim to enable citizens to take advantage of whistleblower and public access to information laws wherever such laws exist.

The Theory of Change that emerges from the programme’s planning documents, can be reconstructed as follows.

Objectives 1 and 2
If Transparency International National Chapters build coalitions of 10-15 CSOs across sectors affected by a lack of transparency and participation in public budgets, and train these CSO partners on public budget monitoring as well as advocacy, then the coalition members will actively participate in processes around the design and monitoring of public policies and procurement. As a result, governments will become more accountable to their citizens around budgeting and the use of public funds.

Objective 3
If ALACs monitor the implementation of whistleblower protection and access to information laws, and if citizens are informed and supported in reporting and addressing corruption cases in their communities, then whistleblower and access to information laws will be better implemented in the countries where these exist.

Budget and implementation
The total budget of Sharaka2 was 1,930,314 euro in total in the original contract. The programme was funded by the German Federal Foreign Office. The programme had three reporting periods: 2018 (four months), 2019, and 2020. The year 2018 was the project launch phase, and aimed at assembling the project

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5 The narrative Draft Proposal 2018 did not specify a Theory of Change. As part of the evaluation, the report reconstructs the elements of the Theory of Change based on the project rationale and description of project phases contained in the proposal.
teams, setting up (or improve) the functions of the chapters’ Advocacy and Legal Advice Centres (ALACs)\(^6\), and establish relations in pursuance of creating CSTMBTs. The second period is the calendar year 2019 and was aimed at conducting national trainings, drafting a first set of position papers, organising annual budget accountability sessions, and comparative regional studies. Finally, the last component of 2020 aimed to conduct advocacy with official authorities and organise hearing and accountability sessions with them, continue public campaigning and public support through mobile ALACs. At the time of writing of the evaluation, the programme was implementing a no-cost extension until March 2021.

### 1.2 About the evaluation

**Purpose and scope**

The aim of this evaluation is to assess the project’s performance in terms of its process and its progress towards the project goals and objectives. The evaluation provides external feedback by analysing the project’s achievements and implementation and by identifying learning points and good practices, as well as strengths and weaknesses to take forward. The evaluation also helps to record the project legacy and provide concrete recommendations that can help guide the implementation of future projects of the TI Secretariat and TI National Chapters. Finally, the evaluation report also supports TI’s accountability to its donor.

**Methodology**

To assess the project from different angles, the evaluation is framed around six dimensions: relevance, coherence, effectiveness, efficiency, impact and sustainability. Each dimension is led by several research questions. See the table below.

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<th>Dimension</th>
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| Relevance | - Is the programme as such relevant to the national context?  
- Is the overall rationale and approach of the programme appropriate to achieve the identified overall objective, and the project specific objectives?  
- Are the programme activities in line with the project objectives?  
- Are activities of Sharaka2 balanced? or is Sharaka2 doing something too much or something too little?  
- How should Sharaka2’s activities and approaches be adapted to better strive towards its objectives?  
- How should Sharaka2’s activities and approaches be adapted to better accommodate contextual changes? |
| Coherence | - Are the different activities of Sharaka2 consistently coherent and logical?  
- Are there other similar interventions, being implemented in the national chapters, by INGOs/CSOs/Donors etc?  
- Are there any activities/analyses in place that situated the role/activities of Sharaka2 vis-a-vis other similar interventions? |
| Effectiveness | - What progress has been made towards achieving Sharaka2’s objectives and the indicators/metrics laid out at the beginning of the programme?  
- What have been the challenges faced and lessons learned in implementation? |
| Efficiency | - Has Sharaka2 been efficient in carrying out its activities? |

\(^6\) [www.transparency.org/en/alacs](http://www.transparency.org/en/alacs) “Operating in more than 60 countries, our Advocacy and Legal Advice Centres (ALACs) empower individuals, families and communities to safely report corruption when they see it happen”
A more detailed version of the above table served as the evaluation framework and was used as the guiding document for the overall evaluation. The Head component is the data collection part, which consists of two main methods: desk research of relevant documents’ review and interviews. The evaluation team conducted a total of 32 interviews for the review: with members of TI national chapters (Jordan 3; Morocco 1 and written responses; Lebanon 4, Tunisia 1), representatives of TI Palestine, who have informed the design of Sharaka2 (3), external partners of the programme (3 in Tunisia and Jordan and 2 each in Lebanon and Morocco); researchers working on publications on budget transparency and participation in the MENA region (2) and German embassies (4) in the implementation countries. The evaluation team took part in an in-depth briefing with TI-S at the start of the review, and interviewed 2 staff from TI-S.

The evaluation team reviewed the internal reporting of TI, conducted key informant interviews with TI Chapters aiming at reconstructing the path to TI’s contribution to change, and triangulating this information with key stakeholder interviews and external documents. Recommendations on addressing contribution to outcomes in project reporting are made at the end of the report.

Limitations

Significant limitations were posed by the global Covid-19 crisis, which made face-to-face evaluation interviews with relevant project team members and site visits impossible. The pandemic also affected the capacity to conduct interviews with all relevant stakeholders. Other limitations of the evaluation are challenges due to the nature of advocacy in often restrictive contexts; an important part of the work consists of investing in capacity building, public campaigning and political advocacy which often do not bring direct results within the short-to-medium timeframe. For instance, it is not possible yet at this stage to observe a stable behaviour change in the general public or wide-ranging policy and institutional change. Rather, the majority of the project consisted of investments and activities that only show their results in the years following. The evaluation therefore looked at evidence for long-term changes which are likely to be enabled by the way in which Sharaka2 was implemented, and highlighted visible change where it has been possible to capture.

Evaluation team

The evaluation team consists of Lama Alarda (Senior Researcher, ODS), Veronika Horvath (Head of M&E, ODS), Hande Taner (Junior Consultant, ODS) and Luckystar Miyandazi (Public Finances policy expert, ECDPM).
2. PROGRAMME-LEVEL INSIGHTS

Relevance

- The review found the programme highly relevant in all Sharaka2 countries. The programmes are designed in a sufficiently coherent way to pursue their objectives, but internal linkages and analysis of the external context of civil society could help strengthen this aspect. Reflection on the Theory of Change and underlying assumptions would help strengthen both coherence and relevance.

- Overall relevance The programme was developed through a shared regional reflection. This led to the articulation of a regional framework for Sharaka2, which was then adapted to national contexts. The approach of working in a regional framework broken into national programmes has allowed TI Chapters in the programme countries to adapt their strategies to the context, and to changes as they emerged. As a result, each of the country programmes was found to be relevant to the national context by TI and the donor. The evaluation has not had the opportunity to validate this assessment with potentially discordant stakeholders (e.g. governments).

- In addition to flexibility in adapting the programme to national contexts, the coalition of Chapters and TI-S also managed planning and implementation with a high degree of agility. The yearly planning and budgeting was open to short-term changes by the Chapters, with TI-S coordinating and facilitating the project management according to TI's internal structure. This flexibility enabled Chapters to respond to changes in their countries, and e.g. keep the programmes relevant even in the Covid-19 context.

- Capacity building interventions with local CSOs are a key activity in several Sharaka2 programme countries. However, the review found that the curriculum and approaches of these were not grounded in a thorough analysis of the existing capacities, gaps and needs of these partners. This gap has potentially limited the relevance of the capacity building curricula. At the same time, the limitations posed by a lack of background analysis were mitigated by flexible approaches in the capacity building processes, which allowed CSOs to implement the new knowledge in line with their capacities.

- Overall coherence The programme’s rationale and the channels through which TI pursues these objectives were found by the evaluation to be aligned with the overall objectives of reducing corruption: each Chapter’s application articulates the rationale behind pursuing their preferred strategies. The programme activities were structured in line with the overarching objectives of Sharaka2 and built on the previous work of the Chapters under Sharaka1.

- Gaps persist in the sharing of knowledge and information within the network. This includes information about activities being implemented, changes to which the Chapters’ advocacy contributed, or practices around understanding the change in attitudes and behaviours of the stakeholder groups with whom the Chapters work. This makes the assessment of the programme’s coherence in practice challenging, even as the rationale from the planning documents appears to be sufficiently solid.

- The programme’s activities include a range of public engagement and campaigning activities, ALACs and structured research. The programme could be strengthened by articulating the connections between the different types of interventions - e.g. how does the research inform the outreach activities with different stakeholders (local level, youth?).

- TI Chapters are aware of the work of CSOs advocating on corruption in each national context. However, the work of other CSOs have not been systematically analysed. On the basis of interviews with TI stakeholders and the donor, TI Chapter’s added value in each context is related to the organisation’s credibility, expertise in the more technical aspects of financial transparency; and TI’s ability to follow-up on processes on the longer term.

- Theory of change The evaluation surfaced several assumptions around the programme’s activities which would need to be further articulated and tested in order to understand whether the Theory
of Change of the programme is correct. Below are some examples of assumptions that have emerged from the review across all Chapters.

- Assumption: building young people’s understanding about corruption is an effective way to reduce corruption. This assumption is evident in several Chapters’ focus on engaging with schools and universities. However, the assumption also rests on the premise that corruption results from insufficient understanding.
- Assumption: if the advocacy capacities of CSOs are strengthened, they will carry messages that are relevant and effective to realising Sharaka2’s objectives.
- Assumption: advocacy from CSOs such as TI Chapters and their partners can influence budget practices in the four countries in Sharaka2.
- Assumption: participatory budgeting processes are feasible in the four countries in Sharaka2.

**Effectiveness**

- Overall, the programme has contributed to public engagement and keeping the issue of participatory budgeting on the advocacy agenda. In all of the contexts, the interviews with TI, partners and the donor surfaced a narrative around TI’s main contribution. The most visible main contribution is connected to TI’s mission of being a voice of expertise on corruption who can carry the message in an otherwise restrictive context, where few other CSOs do comparable work. This role was felt to be relevant in all national contexts by TI and the donor.
- This is a significant outcome in the context of Covid-19, where the attention of decision makers and the public was focused on public health.

**Strong evidence of contribution**

- The programme also contributed to strengthening the knowledge of CSOs about transparency and participatory budgeting. The main channels towards this outcome were formal organised training and workshops, and in some cases learning by performing local advocacy actions. The strongest outcomes of this engagement was around increasing the evidence base and available tools, for instance through creating toolkits. Few examples of successful implementation of the training content were reported.
- TI’s work contributed to strengthening the networks among CSOs in all countries, and particularly in Lebanon and Tunisia. The building of coalitions around budget transparency and participation has offered a new platform to engage across thematic areas and build bridges between TI and local, often grassroots CSOs.
- TI has contributed to forming other connections as well. In Tunisia, the organisation started investing time in establishing trustful relationships with municipalities in the hope of running pilots for transparency tools. In Jordan and Morocco, TI curated and strengthened its networks with members of Parliament.
- All countries engaged citizens (including youth as a special group) around corruption as well as the importance of participatory budgeting and transparency. This outreach took various forms, from communications campaigns to interactions with students at schools and universities. The Chapters all lacked information on the impact and reception of these venues of interaction, therefore their main outcome can be assumed in raising the visibility of TI’s key issues, and not in behaviour change.
- Several of the changes reported under Sharaka2 were related to the outcomes of the ALACs and filing cases with country- level bodies (e.g. TI Jordan). ALACs have contributed to citizens’ ability to take action against corruption by informing them about the possible actions, and supporting cases.
- Several of the challenges identified by Chapters were shared across countries.
  - all Chapters encountered challenges in working with CSOs. It was felt that the motivation and capacity of potential partner CSOs was not sufficient. This limitation could be the results of a lack of background analysis before deciding on an approach centered on network building.
○ In the context of Covid, Online events appeared to be only partially effective replacements to the personal involvement, capacity strengthening and network building between partners.
○ Chapters often felt that the in-house expertise was not always sufficient to conduct the work on citizen budgets, transparency or participation.
○ At the level of TI-S, the programme had flexibility to change or discontinue activities which did not meet expectations and organise missions (whenever possible in the context of travel restrictions) to address specific crises. However, it was unclear from the information available for the evaluation how each Chapter addressed the challenges listed above challenges, which could significantly limit the effectiveness of the programme.

**Efficiency**

4. **Internal organisation and management.**
5. Due to the structure of the Movement and the programme, the programme was implemented in a two-level structure, based on a contract between Chapters and TI-S. Chapters had responsibility for planning and implementing the programme. TI-S importantly, was responsible for accountability towards the donor. This division of roles has created a mismatch between mandates, and a lack of clarity in the locus of responsibility for delivering on programme objectives.
6. TI-S has played a role in facilitating the design and management of the programme, as well as managing emerging issues in the four programme countries. TI-S had responsibility assisting with budget and planning updates, coordinating monitoring and reporting and supporting learning exchange.
7. The programme was supported by a Programme Coordinator, a Regional advisor covering all programming the MENA, and for some of the implementation a Programme Assistant. TI-S role in facilitating learning and reflection was more limited than originally expected. This was due to Covid-19 travel limitations, but also to a lack of clarity in communications and exchange of information about needs across Chapters and between TI-S and Chapters.
8. The evaluation found that closer involvement from TI-S in structuring the programme’s Theory of Change (how the Chapters envision that their activities will lead to the desired outcome) as well as leading on implementing tools for monitoring and reporting according to outcomes (as opposed to activities) aligned with the Ti Strategy, would have added considerable value to the programme. TI-S efficiency was limited by staff shortage (for instance gaps between staff on long-term leave and recruitment of their replacement) and the high level of flexibility in adjusting programme budgets and activities which in turn required considerable time to administrate.
9. TI-S reported a lack of information sharing across Chapters and between Chapters and TI-S. This has led to challenges in facilitating the programme.
10. Interviews have indicated that exchanges across the four countries were limited, due to lack of interest and time. This has limited the exchange of information, even as the Chapters faced similar challenges. It’s possible that exchanging their experiences would have aided them in learning from each others’ working practices on advocacy in restrictive contexts, practices in catalysing diverse CSO alliances, and useful approaches to capacity building on technical issues.
11. Internal stakeholders have felt that collaboration within each individual country Chapter was challenging. Collaboration includes handovers, sharing of contacts and information, and sharing reflection and planning of activities.
12. **Capturing TI’s contribution to change:**
13. The evaluation found limited evidence of the Chapters’ internal practices around tracking progress towards the programme’s goals; and define TI’s contributions to changes where these happen. While it is often challenging to implement outcome tracking systems for advocacy programmes, tools and practices are available (E.g. outcomes harvesting, change diaries). Using a few shared frameworks would enable Sharaka2 partners to exchange information around best practices and challenges.
14. The evaluation found no clear distinction between project activities and progress towards objectives and outputs in the reports. Reporting was often focused on the implementation of activities, without
linking these to the longer-term goals (or Theory of Change) of Sharaka2 and Chapters’ or TI’s overarching strategy, and had limited description of the specific contribution of Chapters to the changes sought. This was also reflected in the structure of the reporting templates used to report from Chapters to TI-S and feeding into the annual reporting toward the donor.

**Sustainability**

- TI is highly likely to continue its general advocacy and anti-corruption awareness raising work after the implementation of the Sharaka2 programme. However, in the absence of targeted funding and programming, a focus on budget transparency and participation is likely to remain among the priorities only of those Chapters where a) staff has sufficient knowledge and skills and b) the advocacy environment offers opportunities for engagement around budgets (e.g. the Open Government Partnership in Morocco).
- Therefore, securing funding: building staff capacity and revisiting the strategies of Sharaka2 in line with the country contexts and a thoroughly articulated Theory of Change are found by this review to be key conditions for sustainability.
- TI-S invested time and funds in the sustainability of the awareness raising programme and citizen engagement by migrating data sets from the ALACs to a new system and implementing a Salesforce interface, rendered in Arabic also through the use of the grant’s funds (due for completion at the end March 2021). It is too soon to assess the contribution of these activities to the sustainability of programme outcomes.

3. FINDINGS PER COUNTRY

This section summarises findings from interviews and document reviews in each of the four programme countries. The country sections each comprise 1) a review of emerging insights along the evaluation questions (Relevance; Effectiveness; Efficiency; Sustainability; Impact) 2) an overview of project activities from reporting (Annex I) 2) an overview of the context and main developments in the last 2 years (Annex II) 3) an overview of the context in terms of budget transparency and participation (Annex II).

3.1 Jordan

**Relevance / coherence**

- The CSOs with whom TI-JO partners cover a relevant array of different sectors: health, education, environment, labour and youth. This diversity in the coalition means that TI’s work and capacity building reaches more fields, and has the potential to raise awareness of CSO roles in budget transparency across policy areas (not just anti-corruption). At the same time, diversity means that the capacity building materials need to be generic enough to be applicable to CSOs across focus areas, and that space for collaboration between coalition members is less evident than it would be for sector-specific coalitions.
- Focusing on monitoring of budgets and strengthening the CSO community’s ability to engage with local budgeting is a highly relevant focus area for Jordan. This finding was echoed by external partners of the programme. TI-JO’s work in enabling CSOs to engage with budgets was found to address a gap in Jordan where no other initiatives exist.
- The Sharaka2 funding has been found highly relevant for the context of Jordan, as corruption is perceived as a taboo topic in Jordan and the civic space does not display enough activity in

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7 The information in tables is a compilation of the information from the Chapter narrative reports, each respectively corresponding to the time frames in the first column. It must be noted that there was significant repetition under project activities and progress in the reporting. The difference between a project activity and what constitutes a progress was thus not always clear from reporting. The evaluation team has analysed and restructured this information.

8 The report refers to TI-JO as Rasheed and TI-JO interchangeably.
combating corruption, regardless of the fact that fighting corruption is articulated as a national priority. Therefore, the presence of a respected and internationally recognised organisation which is vocal about corruption-related issues in a variety of sectors, is of symbolic relevance. This assessment was echoed in the interview with the donor and feedback from CSOs participating in TI-JO training.

- Given this context, the logic behind working with youth appears to be highly relevant and coherent: the project is aimed to encourage a shift in the mindset around corruption, assuming that young people would reflect on the insights and conversations provided by TI-JO in their personal and professional lives. This assumption underlies the work of TI-JO with universities. At the internal logic level, this is a coherent argument for working with higher education. However, the programme approach is not rooted in research-based evidence on the long-term behavioural or attitude effects of the interventions of TI-JO in universities. The relevance of the programme's intervention could be increased by understanding the longer-term contribution of TI's continued engagement at universities.
- The programme is highly relevant and Rasheed uniquely positioned in producing evidence-based information on corruption in Jordan through research and investigative journalism. The work builds on the reputation of Rasheed in Jordan as an organisation with deep expertise, which is well-respected by all stakeholders. This importance was echoed in interviews with the donor and internal stakeholders, as well as feedback from CSO partners.
- TI-JO’s position in the country is also uniquely suited to monitor elections with a special focus on transparency and accountability.
- The evaluation surfaced two challenges to making the project more relevant for Jordan:
  - There was a lag between developments in the policy and legal context and the content of the tools (e.g., ALAC Handbook). In the future, more tailored and contextualised tools would make their application easier for the Jordanian context.
  - There were challenges in engaging and networking with NGOs, affecting the time needed to implement activities. Given the number and diversity of NGOs in the partnership, sufficient time to build relationships, trust and understand the capacity gaps and needs of partners, planning for lead time before the implementation would have helped TI in adapting the content of the programme.

Effectiveness

- The programme has contributed to the planned outcomes in Jordan through several channels. These are summarised below according to the strength of evidence found by the review.

Strong evidence of contribution

- **Policy impact** The political efforts of TI-JO to advocate with the government had a clear impact. The Chapter’s position paper on the Access to information Law has opened a new dialogue with the government. The dialogue enabled TI-JO to effectively advocate on several important pieces of legislation: this contributed to the passing of Access to Information Law. In addition TI-JO’s recommendations on the Himmit Watan relief fund and on Covid-19 responses were all received positively, and 80% of TI-JO recommendation on Himmit Watan implemented. At the same time, the partners interviewed have referred that policy impact will depend on the implementation of these measures, as reform often stops at the ‘letter of the law’ without being effectively put into action. Considering follow-up on these successes is therefore important for TI-JO’s future work.

- **Strengthening the knowledge base for CSOs advocacy** The programme contributed to strengthening the evidence base and tools available for CSOs in the country by developing resources, such as a toolkit, training and public papers.

- **Strengthening CSO capacities around anti-corruption activism and budget monitoring** The tools developed by TI-JO allowed for CSOs to gain a new understanding of their role in the country’s economic and financial procedures. Together with capacity building and network meetings, the CSO’s acquired stronger skills in reading and monitoring the state budget, formulating economic and
financial policies and navigating through complex information - examples also raised by the two partners interviewed for the review. This contribution was aided by efficiently organised useful meetings among CSOs, which were highlighted in the stakeholder interviews. However, CSOs interviewed for this review also felt that the materials were not sufficiently adaptable to their individual circumstances, and that more targeted support would have been useful in applying the guidance to the individual local circumstances.

- **Making citizens’ voices heard:** The ALAC supported citizens’ action in several cases. In addition, the fact that the ALACs receive several cases is positive evidence that the general public is willing to approach TI-JO to report cases. The submission of cases to the ALACs indicates an interest and need to pursue corruption cases with the involvement of the public, and the ALACs bring a unique channel of contribution to address this need.
- **Raising the visibility of corruption:** TI-JO’s messaging around the illicit gains law and the requirements for asset declarations for public officials were picked up by media channels and discussed intensely. This allowed for raising the visibility of corruption and potentially broadening the range of citizens who are aware of and concerned by corruption and transparency issues. Partners interviewed for the review highlighted the need for educating the general public alongside CSOs for effectively being able to raise citizen perspectives. Therefore, this action was a useful complement to the work with CSOs. TI-JO’s work at universities has contributed to raising the visibility of corruption among the student population.

**Limited or lacking evidence of contribution**

- **Moving from visibility to shifts in values or actions** TI-JO has theorised that the programme has contributed to a public perspective shift amongst the population. However, the effects of this awareness raising and contributions to the knowledge base were not investigated or captured in reporting, and did not find resonance in the stakeholder interviews.
- The sessions at higher education institutes provide information to law students. However, there is no available evidence on the contribution of work at universities to perspective or values shifts in the student population.
- **Digital engagement** The team in TI-JO responded to the restrictions related to Covid-19 by shifting activities to digital platforms. The Chapter felt that the outreach was not negatively affected by Covid, and highlighted that Covid was a catalyst in improving the virtual approaches of the Chapter. As no clear expectations/targets were articulated for this work, it is not possible to evaluate this statement further. According to interviews with the Chapter, Covid also contributed to increasing public interest in public spending and online activism. The review found no insights around how these findings related to Internet access and privacy context in Jordan, i.e. whether the individuals who access online events are demographically and socio-economically different from those who would participate in live events.

**Challenges**

The implementation of the project encountered two main challenges.

- **Restrictions on campaigns:** Unfortunately, due to legal restrictions, TI-JO was unable to use campaigns as a tool to support the programme’s objectives. For instance, TI-JO had considered implementing an awareness campaign on why people should vote for certain candidates with regards to their stance on corruption, but had to cancel these plans. As a result of restriction on campaigns, the programme’s advocacy toolbox was more restricted than expected.
- **Diversity of partnerships and channels of influencing:** The programme aimed at involving a wide range of stakeholders, including local communities and youth. These networks needed considerable time and adaptation of approaches and content, as well as follow-up, which was not always possible due to Covid restrictions, programme timeframe and limited resources. Programme partners have corroborated the lack of adapting to local action, and a limited engagement with local communities have limited the local impact of advocacy.

**Efficiency**

The review highlighted two limitations related to efficiency:

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Internally, the team in the Chapter felt that the programme would have been more efficient if it had the possibility of relying on more pre-designed tools, messages and implementation resources. While the Chapter managed to deliver all planned deliverables, meeting the planning has required more research and internal coordination that originally expected. In addition, internally the team indicated that a more thorough induction into the technical aspects of inclusive finance would have enabled them to develop outputs more efficiently. **Lack of internal expertise** to work on budget transparency, especially on finance and corruption, affected the efficiency of the project, as it took more time for staff members to develop materials.

- External stakeholders highlighted the need for stronger follow up to interventions, more reflection and a structured assessment on progress; as well as clearer communication strategies, towards partners.

**Sustainability**

- Based on interviews with internal stakeholders, the evaluation has identified a strong need in the Chapter to strengthen the expertise of the staff in order to be able to continue working on budget transparency. In the absence of further investment and internal capacity building, this stream of work is unlikely to be sustainable - although TI-JO will continue working on corruption.
  - Staff and external stakeholders indicated several areas where TI JO could continue or strengthen the existing work. These could include legal clinics, legal research, investment in investigative journalism and more focus on access to information and freedom of expression, and communications.
  - One idea that surfaced around the work with law students regarded investing in formalised long-term cooperation with universities. This could happen mainly through creating hubs or units with the national universities to target law graduates, Large scale training programs with a special focus on drafting laws and legislations.

- Ensuring the sustainability of CSO collaborations: Jordan has few CSOs actively engaging in transparency and participatory budgeting. Therefore, continuing to strengthen the relations strategically with CSOs and leveraging these connections to multiply TI’s messages will be a key element of sustainability.

- Challenges in the political context for TI-JO’s work have affected the programme and will likely continue to do so. Interviews with partners and the Chapter indicated that it expected that the political environment is expected to become more restrictive for anti-corruption activism. TI will therefore likely need to adapt its strategies and accountability structures.
3.2 Lebanon

Relevance

- Sharaka2 is highly relevant to the national context, as public money has always been a hot topic in Lebanon. LTA has identified a need in Lebanese society for citizens to better understand the national budget, which is usually presented in a difficult-to-interpret format. Interviews with partners have supported this need. For instance, one partner highlighted the impact of non-participatory budget processes on the reality of disability CSOs. As such, LTA has a role in leading coalitions of CSOs across several domains, both with regards to advocating for transparency but also social dialogue around budgets (e.g. alternative budgets). The current crisis situation and the measures taken to address overlapping crises have been indicated by internal and external interviewees as an opportunity for relevant advocacy by TI, as transparency is frequently discussed in the public sphere.

- LTA’s advocacy priorities are aligned with those from major financial institutions and donors to the Lebanese government, which make the programme strongly relevant, at least in terms of transparency. Donors and financial institutes rarely include participatory budgeting among their requirements.

- The coherence of the programme was further aided by LTA bringing together all relevant actors in the CSO network, and advocating across policy areas. This was echoed in an interview with a CSO partner.

- Several changes were made to the programme to adjust to emerging changes (including Covid and internal policy developments) and maintain its relevance in a changing environment. The flexibility of Sharaka2 was therefore important to the Lebanese context.

- The programme’s rationale has been appropriate, as the focus on public finance management and anti-corruption management are technical issues, and according to LTA and one external interviewee, the capacity of LTA to bring technical expertise to the discussion about corruption was a particular added value. Another CSO partner highlighted that LTA’s ability to build technical capacity in CSOs was an added value in the vibrant landscape of CSOs in Lebanon. The country is home to a high number of CSOs but they lack these resources and possibilities for acquiring technical capacity, which is key to effective advocacy.

Effectiveness

Strong evidence of contribution

- **Policy impact:** LTA has reported important policy wins in the programming period. The Chapter’s advocacy played a significant role: the amendments to the Access to Information law, which was enforced despite strong political resistance; the establishment of the national anti-corruption commission; the adoption of the illicit wealth law and the establishment of a hotline to report corruption cases.

- LTA contributed to these changes through advocacy at Parliament and Executive levels. Formal meetings with the Minister of Justice for the Access to Information law and decree. LTA has formulated recommendations grounded in research, several of which were taken up in the decree. LTA also worked with an amendment of Access to Information presented by an MP, which was also taken up in the suggested bill amending the Access to Information law.

- In April 2020, the law on “Fighting corruption in the public sector and the establishment of the national anti-corruption commission” was approved. This was the result of on-going advocacy and combined efforts of different Lebanese CSOs including LTA.

- LTA has built contact with concerned decision makers such as MPs in the joint parliamentary committee that is handling the amendment of the Public Procurement Law and has been included in close coordination on the matter. After the publication of the statement regarding the public disclosure of Asset and Account declaration, different MPs expressed interest and started publically advocating for it. Therefore, LTA’s work also contributed to creating momentum around this aspect of transparency.
Increasing the visibility of corruption issues in aid: In 2020, LTA followed up on a campaign for aid transparency in the wake of the explosion in the Port of Beirut. The organisation facilitated a series of meetings between aid CSOs on transparency.

Increasing the visibility of corruption issues in the (social) media: LTA contributed to increasing the visibility of corruption in social media by producing more than 30 videos, webinars and infographics. The usage of webinars and other digital tools in the time of Covid made a positive contribution towards the programme’s goals in keeping the visibility or transparency and corruption issues. However, LTA has not articulated markers of change, expected outcomes and does not conduct assessments of other results of awareness campaigns - e.g. shifts in beliefs and behaviour among the target audience. The programme has applied its communication strategy to emerging crises, for instance through producing a set of infographics on Covid19 Highlighting the importance of transparency in the procurement and management of the crisis; or addressing the aftermath of the Beirut blast.

Raising citizens’ voices and participation: Sharaka2 has shown contribution to public involvement in acting on corruption cases. Through the ALAC, citizens started to report corruption cases, which has not happened before. In 2019-2020 a total of 675 calls and 623 complaints were received by the LALAC. The increasing number of relevant calls received by LALAC (including during the lockdown) likely indicates a growing trust and visibility in the institution.

Creating a platform for CSOs interested in transparency: LTA has been at the center of creating the diverse CSO coalition Mouwazana. LTA ran and convened meetings and discussions around crises as they emerged in the past years, coordinated capacity building and led the coalition's advocacy by e.g. organising joint press releases. These activities contributed to creating a new platform dialogue between the CSOs and opportunities to exchange experiences and lessons learned, but also it created the space to unify the vision in many points/topics, which directly or indirectly relate to transparency.

Strengthening evidence base on corruption: LTA has conducted investigative work on emerging issues, such as Rebuilding Beirut and the Distribution of Aid, thus strengthening the available knowledge base on corruption. The output from these activities was used in public outreach, but it is unclear how this information was further used for advocacy.

Limited evidence

Increasing the evidence base and toolbox available to CSOs in Lebanon: LTA has developed several knowledge products that can support the work of CSOs. LTA reported seeing positive uptake of the materials and tools produced under Sharaka2. Little is known about the ways in which local CSOs used these materials - although the external interviewees provided anecdotal evidence of a few examples where the materials were used in social media.

Creating a new narrative around transparency in emergencies: LTA felt that “Transparency saves lives” as a slogan was really ground-breaking with great impact which was echoed in several speeches around the debate on the law on the transparency of revenues of public servants. It is unclear whether political narratives have changed considerably in line with this slogan, without specific analysis of discourse.

Efficiency

Adjusting and modifying the planning: throughout the programme. LTA has benefitted from the agile management of the programme. The Chapter has made several changes to the planning throughout the implementation period to accommodate emerging conditions. These have all required investment of time from both the Chapter and TI-S, and likely have decreased efficiency in some cases (e.g. decisions on using experts have led to time for recruiting and then deploying the

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9 Lebanon Narrative reporting Sharaka 2020 January- September
external contractors). At the same time, flexibility enabled the Chapter to pursue advocacy in a highly volatile context.

- **On reflection**, the chapter felt that efficiency of the work, especially in knowledge production would have been enhanced by increasing the in-house research capacity to respond to the changes in environment as they emerged, and to brief all outreach activities on the technical side, and to provide technical briefing to the design of individual interventions.

- **Managing a coalition**: The coalition under Sharaka2 consisted of actors from different sectors working through collective action. The main value of the coalition was in the form of its flexible mechanism under which CSOs work and exchange; and the flexible frameworks for the different topics. However, the coalition’s establishment and the building of trust needed significant time and efforts. The operation of the coalition in turn was severely affected by the political developments.

**Sustainability**

- The Chapter’s own sustainability planning has two pillars:
  - Technical role: does evidence-based work, and establishes comparisons with trends and standards globally, which will depend on the level of in-house resources available to the programme;
  - Political role - monitoring and advocating around implementation: LTA plans to continue addressing political stakeholders and their audiences. The Chapter identified some upcoming policy areas which could be relevant for Lebanon, including the illicit wealth law’s implementation and the anti-corruption commission.

- Partnerships: Interviews conducted for this review and the document review did not find an explicit plan for the future of the Mouwazana coalition. An explicit plan for collaboration and priorities would help strengthen this aspect of the work. At the same time, the Chapter has signed a formal MoU with the Basel Fleihan institute, which indicates a longer-term planning of that partnership.

- The sustainability of the outreach and communications efforts is likely to be low, as these outputs were especially designed for time-bound events.

- Finally, the sustainability of the work will depend on a clear advocacy, outreach and capacity building strategy (with options for adaptation/response to emerging issues), building on the Chapter’s experience with a programme that has seen several changes in the two implementation years in the last programming period.
3.3 Morocco

Relevance

- Budget Transparency is one of the main pillars of the open government programme of Morocco under the Open Government Partnership.\(^\text{10}\) TI plays a role under the OGP structure as part of the Steering Committee of the OGP Action Plan. This development was a key driving force behind CSO action for transparency in Morocco since 2018.
- TI’s programme is coherent with the priority of building CSO capacities to hold the government to account on these commitments.
- Balancing work with local and national stakeholders was an important element of programme planning.
- TI reported having performed a scan of other actors advocating on similar issues. In Morocco a few CSOs work on access to information. It is unclear how TI works with these organisations. However, TI leads the national commission for transparency where the organisation has contact with CSOs working on transparency. TI reported that consultative discussions take place between CSOs fighting corruption to harmonise approaches.
- TI-M’s position in Morocco would benefit for a clearer definition. As the organisation works closely with the government in several settings, there is a risk to its position or to not be seen as a credible challenger to government policy by other CSOs.

Effectiveness

- The programme contributed to strengthening Moroccan civil society’s work around corruption by setting up a network between CSOs and delivering capacity-building and awareness-raising trainings

**Strong evidence of contribution**

- **Keeping budget transparency on the agenda and channelling CSO views into the debate** Throughout the programme period, the Chapter has produced several outputs related to government and budget transparency, including position papers and conferences. These channels contributed to keeping the OGP criteria and the broader question of transparency visible in public debate. TI’s role in the CSO consortium has facilitated the presence of CSO voices around these events. It remains unclear to what extent the events or the outputs influenced government policy definition or implementation.
- Some of these efforts have borne fruit: in 2019, the Ministry of Health published a summary of its budget accessible to citizens, in line with recommendations from TI and CSO partners.
- The interactions between policymakers and the CSO coalition have also contributed to establishing individual relationships between CSOs and advocacy targets in the government, with several formalised platforms for exchange which had not existed before.
- **Helping raise citizens’ voices** Through the ALAC, the programme contributed to filing corruption cases and supporting civilians in their access to information. TI-M has also constituted itself a civil party in 3 procedures related to corruption. TI-M has built strong relationships with the Moroccan government. TI-M reported that advocacy from TI has helped influence the policy around processing cases received through ALACs, leading to a shorter time frame.\(^\text{11}\)
- **Strengthening the visibility of corruption issues and the importance of transparency.** TI-M has implemented an extensive media campaign, which has provided information on multiple channels. In 2020, the programme funded two information campaigns, 1 related to the access to information which reached 1,135,490 listeners, and 1 related to citizen budgets, which reached 29,927 listeners.\(^\text{12}\)

\(^\text{11}\) Narrative report July-December 2019
\(^\text{12}\) Narrative report Morocco 2020 Jan-September
● **Strengthening the evidence base on corruption cases** TI M has cooperated with investigative journalists. Following training for 8 investigative journalists across the country, TI M and the journalists collaboratively launched an investigation into the Covid fund, which is scheduled to be released in early 2021.

● **Expanding the range of tools toolkit available to citizens** The programme produced guidance for budget transparency for interested citizens. It can be presumed that this has contributed to extending the knowledge base around budget transparency in Morocco. However, no information is known about the ways in which this guide was used by citizens.\(^\text{13}\)

**Limited evidence of contribution**

● **Basis for capacity building with local CSOs** The programme has implemented cohorts of capacity building with CSOs in multiple locations within Morocco. Working with CSOs in a long-term setting was found to be a relevant strategy for capacity building, as it enables follow-up and internal take-up of the training programmes. It remains to be seen however, to what extent this potential has been realised in Morocco. There is no evidence of the effects of the network on the work of partners.
  ○ One partner interviewed for this assessment felt that the capacity building was relevant in terms of skills needed to analyse and advocate around public finances. However, this assessment was based on TI’s own views, and not input from the CSOs. The capacity building programme was not rooted in an assessment of gaps and needs of local CSOs, which is a limitation to its relevance and effectiveness.
  ○ These limitations were mitigated by the structure of the capacity building programme, which covered ‘open’ methodologies, designed to be adaptable to the local context of each partner.
  ○ Due to Covid-19, several capacity building activities were not implemented. It was unclear whether TI has put into place other means of curating the network and keeping up momentum around the implementation of the OGP commitments and with the capacity building network.
  ○ TI-M expected further limitations to national convenings on anti-corruption due to Covid measures.

● **Challenges:** The following challenges were identified to effectively reaching the programme objectives:
  ○ Finding CSOs who are interested by working on the project topics, especially on the technical side;
  ○ Mobilising CSOs throughout the process;
  ○ Mobilising governmental stakeholders to commit to transparency.

**Efficiency**

● The Chapter felt that the internal programme management was overall efficient, with sufficient funds to recruit experts where needed.

**Sustainability**

● It is unclear to what extent the outcomes of the project will have a lasting effect in Morocco.
  ○ The network of CSOs has established a formal organisation and participated in several meetings and capacity building. However, the Chapter found the engagement of members challenging, which might indicate that the network relies on TI-M’s ability to drive and coordinate the collaboration.
  ○ The Moroccan government is following the OGP process closely, which might offer an opportunity for lasting impact through TI’s input into this process.
  ○ It is likely that the frameworks and tools developed by TI-M will only be applied by CSOs if dedicated support and investment from TI continue.

\(^{13}\) Narrative report July-December 2019
The programme has identified lessons learned for future planning. These cover:

- A need to increase efforts to work at the local level; including structuring activities in a way that local CSOs can commit to the programme. External stakeholders also highlighted the relevance of working with more CSOs beyond the circles of those who are already aware of budgeting and public finance issues.
- Enhance the role of the ALAC to raise awareness about grand corruption.

3.4 Tunisia

Relevance

4. The planning of Sharaka2 took into account the political and social context in Tunisia since 2011.
5. The programme's focus on inclusive finance was well aligned with IWatch's mission to combat corruption by engaging citizens. Sharaka2 contributed to an increased focus on local-level corruption in the strategy of IWatch.
6. In particular, the programme decided to focus on municipal-level budget monitoring (via the development of monitoring kit) as the first municipal elections since nine years were taking place during the Sharaka2 implementation. As such, the programme was highly relevant to the Tunisian context.
7. The focus of the programme was on participatory budgeting, based on the assessment of IWatch of the barriers facing municipalities in Tunisia (lack of sovereignty and autonomy).
8. The programme added value by raising the issue of corruption at the local level, where, according to IWatch, previous advocacy and lobbying by CSOs focused almost exclusively at the national level. This has further contributed to the programme's relevance.
9. IWatch prioritised enhancing the participation of citizens and at the local level. This was a novel approach for Tunisia. It has led to engagement across a broad range of fields and societal groups. Partners interviewed for this review also highlighted that the participatory approach was an added value of the programme and set it apart from other initiatives in the country, and allowed the programme to map out the concerns of citizens.
10. Sharaka2 is relevant to the donor's (German MFA) priorities in the region. The focus of the programme on strengthening the accountability of public bodies and strengthening civil society is aligned with the analysis of the donor on the barriers to democratisation in the region. As such, Sharaka2 fits well with the broader goals of strengthening the rule of law and institutions - transparency, accountability and public debate, together with strengthening the knowledge base on participatory governance. The same donor is implementing programmes with public bodies and other CSOs working on the rule of law.
11. According to the donor, IWatch is a prominent actor in anti-corruption advocacy, and hence an appropriate partner for the German MFA in this programme. IWatch's work is enabled by a strong reputation and deep-rooted expertise, as well as an in-depth understanding on strategies to reach media and the public in Tunisia.

Effectiveness

- As the programme was implemented in partnership, the credibility and profile of IWatch and partners was a key element to ensuring that advocacy targets would engage with the initiative.
- The contributions of Sharaka2 at the point of review were identified in visibility of the importance of working with the public in budgeting; strengthening the skills of young people (mainly elementary school students) in relation to corruption, and engagement with partners.

Strong evidence of contribution

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14 Anonymous interview
• **Raising the visibility of corruption with citizens** The programme in Tunis aimed to engage different segments of the population, with a specific focus on engaging young people. The programme used a variety of pathways to change, including engagement of students through playful means (e.g. sports events and school days). The evaluation found that this approach was well aligned with the goals of Sharaka2 of addressing the younger generations. However, the programme did not have detailed expectations or indicators related to the effects of this engagement (what would be the goal of these outreach activities and how could IWatch know if this happened?).

• **Strengthening CSO network**: Partners interviewed for the review highlighted the importance of the participatory approach taken by IWatch to bringing CSOs together and discussing their perspectives together. Over time, this has contributed to increased trust and a willingness to cooperate among partners.

• **Strengthening the capacities of municipalities and connecting municipalities with the CSO communities** The programme implemented training at two municipalities on transparency issues related to local governance.
  - Long-term effects in terms of knowledge and change in the behaviours and practices of these municipalities, or signs of change that could imply contribution towards longer-term change were not captured by the programme.
  - Working with local clubs has contributed to strengthening the mutual respect and understanding between them and the municipalities. For instance, on one occasion, requests from a local club unrelated to corruption (municipal waste management) were heard and addressed rapidly after the field visit with citizens took place. Local clubs felt that this would not have been possible without the strengthened relationship.\(^\text{15}\) It is interesting to note that the municipality in question informed IWatch about taking this action, which points to the driving role of the organisation in the municipality’s attitude.

• **Strengthening the capacity of CSOs** The initial phase of the programme surfaced a lack of lobbying and advocacy capacity in local CSOs which could be allies to more participatory municipal budgeting. Therefore, Sharaka2 contributed to strengthening the lobbying and advocacy; and corruption expertise of these potential allies through training workshops. It is unclear to what extent the programme aims to keep up engagement with these allies in order to enable capacities to become more deeply embedded in their daily work.

• **Contributing to raising citizens’ voices about corruption**: The work of the ALACs in Tunisia has led to engagement on concrete corruption cases received from citizens.

**Limited evidence of contribution**

• **Strengthening citizen capacity to advocate** The programme explicitly aimed to balance engagement with different target groups, including national/local and youth/CSO engagement. Partners interviewed for the review were appreciative of the inclusivity of Sharaka2. However, they also highlighted further need to follow up on engagement in order to make sure that capacities are used: additional focus on local engagement of individual citizens and CSOs could have led to a stronger increase in skills and capacity to advocate.

• **Influencing the transparency practices of municipalities**: No effects were captured in the practices and policies of municipalities.

• **Supporting whistleblowers**: No effects were captured by the programme at the levels of individuals whistleblowing or whistleblowers’ requests being followed up on (as defined in the logframe). The programme did however provide information about whistleblowing at numerous events.

• **challenges**

**Efficiency**

- IWatch felt that the human and financial resources were sufficient to deliver on the programme as planned.

\(^{15}\) Progress report 2019-2020
• Working with other TI Chapters in the production of the regional studies commissioned with Sharaka2 funds has contributed to IWatch strengthening its expertise and defining its own strategies in inclusive finance.
• Covid-19 had a strong impact on the programme in Tunisia, as most of the activities relied on face-to-face meetings.
• IWatch chose to convert as many activities as possible into online events. This approach had limited success. For instance, IWatch identified a lack of internet access, cultural barriers, corruption remaining a sensitive topic and a lack of willingness of targeted participants to be involved online behind the challenges met by the annual accountability session, which usually aims to engage a wide audience. It was unclear how IWatch built on these insights in planning events forward.
• Relationship with the donor has been sufficient for exchange of information. However, the evaluation found that a closer relationship could help support IWatch’s advocacy goals.

Sustainability

• IWatch highlighted the persistent lack of funds and capacity of the Tunisian CSO community to work on corruption. Therefore, the sustainability of Sharaka2’s work will depend on the extent to which local partners are willing and able to develop these skills. Resources from the programme will likely be only a partial answer to the gaps in capacity at the local level. The evaluation found that the sustainability of action at the local level will depend on continued involvement of IWatch.
  ○ Sharaka2 has taken the first steps in working with municipalities. However, for a longer-term continuation of this work further dialogue will likely be needed before the engagement leads to visible changes in the practices of these municipalities. The sustainability of that work will also need to take into account election cycles and plan for continuity even in scenarios where key contacts in the municipality change.
• The Chapter has identified several additional fields of advocacy for continuing the work. These could include:
  ○ State response to crises;
  ○ Justice systems reform;
  ○ corruption in the health sector and citizen engagement.

The review found it likely that IWatch and the broader TI network will continue to play a leading role in keeping these issues on the agenda. As a result, a broader scope of the work conducted under Sharaka2 will make additional funding necessary.
• The changes sought by TI in Tunisia are likely to take place on a longer timeframe than what is covered by this review. Therefore, a long-term strategy for following up on achievements would further strengthen IWatch’s approach (e.g. putting into place a strategy to follow up on news items or investigative insights on corruption and budgeting).
• Approaching systems change through local changes reads as a long-term strategy. The programme would benefit from a clearer articulation of the strategy behind scaling TI’s approach across Tunisia.

4 RECOMMENDATIONS

Relevance

12. Theory of Change Sharaka2 has articulated a broad framework for the programme. This rests on advocacy, lobbying, network building and public engagement. However the connection between the activities in Component I and II and the three objectives of the programme have not been sufficiently articulated. The review recommends TI to spell out the Theory of Change for the programme, and articulate how the tools and activities performed by each Chapter in their national context are assumed to lead to the changes sought by the programme. Articulating the Theory of Change behind the intervention is especially important with regards to the activities that aim to change the mindset and attitudes of the public. Currently, awareness-raising is a significant portion of Sharaka2 activities and it remains unclear on what evidence awareness-raising as performed by
TI Chapters is assumed to be an effective tool towards social norms change. For instance, in Tunisia the programme operates on the assumption that ‘involving young people and familiarizing them with terms like local governance, participative democracy and municipality at a young age, would encourage them to be more active in their local communities, increase their interest in learning and adopting the mechanisms of fighting corruption and entice them to foster public finance integrity, transparency and accountability.’

The programme would benefit from testing this assumption against available evidence on how attitudes towards corruption are shaped. The process of articulating a Theory of Change would be a useful prompt for participating Chapters to articulate expectations and assumptions around the programme. TI-S could play a leading or facilitator role in this process.

13. **Subject focus** Sharaka2 in Tunisia focuses on participatory approaches in budget processes. However, TI’s research found that intergovernmental programmes and donor conditions contribute to making transparency a higher priority for governments, and a more likely pathway towards pursuing change. Focusing on transparency as well as participatory budget-making in advocacy could therefore be a useful strategy for Sharaka2 where this is not already the case.

14. **Capacity building** activities have been found challenging as well. While the Chapters were successful in designing and delivering curricula, limited evidence was found about how the training and toolkits were taken up by the CSOs who participated in these events. Several partners interviewed for the review raised the question that the content or format of training was perhaps not well adapted to the skills and reality of CSOs. The review recommends that Chapters organise a shared structured reflection, perhaps facilitated by TI-S and exchange ideas about conducting needs and capacity assessments before capacity building as well as designing, adapting, following up and assessing the effects of their interventions.

**Effectiveness**

15. **Engaging CSOs:** Chapters identified challenges in engaging national and local CSOs in the programme. They indicated the capacity and motivation of potential partners to engagement. The assessment recommends TI to look at this issue critically and investigate the bottlenecks in engaging with CSOs, and identify strategies to address the lack of engagement. This could take the form of changing the programme’s strategy to de-prioritise work with civil society that is not motivated to pursue anti-corruption work in TI’s networks; incentivising partners through grant making; or other means. The evaluation recommends programmes where the building of a CSO coalition is a central pathway to change, to root their initiative in an analysis of the CSO context of the country, and design the coalition with the different strategies, capacities and motivations to participate in mind. TI-S could facilitate this reflection.

16. **Internal capacity:** Chapters have reported challenges due to insufficient expertise related to budget transparency and participation. This is a strategic issue that the programme and TI-S would likely need to address together. In the planning phase of programmes, Chapters would benefit from a thorough assessment of expertise in the field that each programme would cover, and whether the Chapter’s own expertise would be sufficient to oversee and deliver the expected activities. Where concerns are raised about capacity, strategic hiring should start before the internal processes are finalised to allow each Chapter to start implementation with complete teams.

17. The review team found that TI-S could play a role in facilitating the exchange of expertise which would in turn inform outputs across all Sharaka2 countries (e.g. input on campaigns and deliverables). Expertise in Chapters could be further built for future work by assessing staff skills and knowledge before programme launch; providing training on budget transparency to all TI staff; and providing context analysis (e.g. through disseminating the reports which have been prepared under the funding).

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16 Progress report 2019-2020
18. The planning of campaign activities is another challenge which affects all Chapters in MENA countries and where guidance on technical input, or risk management approaches would be needed.

19. **Adapting to online environments** The review recommends that TI Chapters, together with local partners, reviews and re-plans activities that would be put online to make up for cancellation due to Covid. This could take the form of an analysis of the goals and barriers to these events, and an adaptation that reflects the programme strategy. Instead of online meetings, TI could consider communicating through social media, printed materials, one-on-one calls with main partners, or shift attention to direct advocacy with decision makers.

20. **Timeframes** The change sought by TI takes place on a longer timeframe. The evaluation found that all programme countries had to adapt their strategies several times in the implementation period, given the volatile political context and Covid-19. The evaluation recommends TI to organise an after-action review on Covid response across Sharaka2 chapters (and beyond, as relevant) to reflect on the experiences with this adaptation and to draw insights for programming going forward.

21. **Relationship with the donor:** Interviewees form the German MFA have felt that updates from TI were highly useful to their work. Establishing a close working relationship with the German Embassies in each programme country could help support Sharaka2’s advocacy objectives as well as facilitating the work of the donor. The review recommends TI Chapters in each Sharaka2 country to set up meetings on a rolling basis with their German Embassy. These meetings could be a tool to provide TI’s insights to the work of the Embassies in each country and thus support the advocacy objectives of TI. In addition, progress reports related to the funding could be provided to the contact points in the Embassy.

**Efficiency**

22. **Management** The programmes all needed several months to have all structures and activities in place. This has affected the Chapters’ ability to deliver on the activities as planned, and in turn might have affected the advocacy moments that the Chapters were able to leverage. In future iterations of the programme, we recommend a ‘start-up’ period of maximum 2 to 3 months for programmes of 24 months.

23. In each of the Chapters, complications in the coordination between CSO groups have led to delays and demands for adjusted timeframes. These changes were often made necessary because of Covid-19 and political instability. Lessons from responding to volatile environments could inform forward planning for the programme countries.

24. **Collaboration** between TI-S and the Chapters encountered several difficulties. The evaluation recommends an externally facilitated conversation between the internal stakeholders to define roles and responsibilities. These could be captured in an internal MoU or other agreement to which all parties sign up to.

25. **Capturing the programme’s contribution to change** has been a challenge for all programme countries. The evaluation recommends a review of the reporting template and reflection practice. For instance, different prompts could be used, or the written report accompanied with an oral debrief between TI-S and the Chapter to capture these narratives. The evaluation recommends offering M&E training and ongoing support around reporting to both Chapter and TI-S staff working on the programme, beyond TI MEAL team members.

26. **The role of TI-S:** The evaluation found that closer involvement from TI-S in structuring the programme’s Theory of Change (how the Chapters envision that their activities will lead to the desired outcome) as well as leading on implementing tools for monitoring and reporting according to outcomes (as opposed to activities) aligned with the TI Strategy, would have added considerable value to the programme. Therefore, we recommend that the staff in TI-S invests time in the start-up period and throughout monitoring and reporting, in articulating expectations and pathways to change. In a programme with similar scale, this might mean that additional resources (e.g. a half- or full-time Project Assistant, or a support person with MEAL expertise) need to be budgeted for.
# 5 ANNEX I TIMELINE OF IMPLEMENTATION BY COUNTRY BASED ON ANNUAL REPORTS

## 5.1 Jordan

<table>
<thead>
<tr>
<th>Project activities and outputs</th>
<th>Progress towards objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Sept - Dec 2018</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Project management</strong></td>
<td></td>
</tr>
<tr>
<td>- Team brainstorming session;</td>
<td>- Building CSO network through</td>
</tr>
<tr>
<td>- Preparation of presentations to approach CSOs;</td>
<td>- Groundwork laid for CSO engagement instate budget preparation and monitoring of public funds;</td>
</tr>
<tr>
<td>- Research on CSOs to prepare a list to invite;</td>
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<tr>
<td>- Team of CSOs named “National Team for Enhancing Budget Transparency”;</td>
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<tr>
<td>- visual identity and unified goal for the CSOs team created</td>
<td></td>
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<tr>
<td>- Website preparations done and call for developer shared;</td>
<td></td>
</tr>
<tr>
<td>- Desks for the project coordinators bought</td>
<td></td>
</tr>
<tr>
<td><strong>ALACs</strong></td>
<td></td>
</tr>
<tr>
<td>- ALAC Project Coordinator hired;</td>
<td></td>
</tr>
<tr>
<td>- Steps identified to establish the ALAC following Sharaka 1;</td>
<td></td>
</tr>
<tr>
<td>- ALAC received two cases</td>
<td></td>
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</tbody>
</table>

<p>| <strong>Jan - Dec 2019</strong>            |                             |
| <strong>Network building - CSOs</strong>  |                             |
| - designing MOU for CSO network |                             |
| - Launch of CSO toolkit |                             |
| <strong>Network building - Academic</strong> |                             |
| - Cooperation with UoJ and students' initiatives started; |                             |
| - Coordination with JIACC formalised |                             |
| <strong>Capacity building with CSOs</strong> |                             |
| - Training workshop in April with 11 CSOs following training delivered by TI Palestine in cooperation with TIS; |                             |
| - This workshop resulted in a Civil Society Toolkit on Budget Transparency and Social Accountability |                             |
| - Workshop with CSOs on their role in budget monitoring and the know-how needed for the task; |                             |
| - Training with CSOs on financial transparency; |                             |
| - Launch of CSO toolkit, training on its usage and translation into English; |                             |
| <strong>Awareness raising</strong>         |                             |
| - Social media awareness campaign on the protection of reporters and anti-corruption topics |                             |
| - Capacity-building training for 70 students from the UoJ; |                             |
| - Six outreach campaigns conducted and 1200 |                             |
| <strong>Strengthened CSO network</strong>  |                             |
| - MOU, |                             |
| - collective training and events |                             |
| <strong>Strengthening cooperation with university/students</strong> |                             |
| - formalising cooperation |                             |
| <strong>Strengthening CSO capacity</strong> |                             |
| - Training with CSOs |                             |
| - Making Toolkit available and giving guidance on its use |                             |
| <strong>Strengthening knowledge base and available tools for citizens</strong> |                             |
| - Citizen Guide for Reporting Corruption, and |                             |
| - CSO toolkit |                             |
| - Research products |                             |
| <strong>Increased visibility of anti-corruption work</strong> |                             |
| - outreach campaigns |                             |
| - TI Jordan has acted as ALAC coordinator for Jordan’s UNCAC periodic review |                             |
| - Cooperation with influencers, media outlets and investigative journalists; |                             |
| <strong>ALAC- contribution to addressing corruption cases/increasing their visibility</strong> |                             |</p>
<table>
<thead>
<tr>
<th>Research</th>
<th>Advocacy and ALAC</th>
</tr>
</thead>
<tbody>
<tr>
<td>● Legal research conducted on anti-corruption topics: illicit gains law, access to information, whistle-blower protection, asset recovery and anti-corruption commission’s independence;</td>
<td>● Launch and hearing session of position paper;</td>
</tr>
<tr>
<td>● Research materials created for Jordanian youth on legal analysis, advocacy on anti-corruption themes;</td>
<td>● Launch of policy paper for the CSO team;</td>
</tr>
<tr>
<td></td>
<td>● ALAC received three cases</td>
</tr>
</tbody>
</table>

**Programme management**

- ALAC website launched;
- Identifying best partners for CSO network;
- Mini research projects by the ALAC on creating synergies b/w ALAC and other TI-JO projects
- Government funding approval at the end of Feb,

Jan - Sept 2020

**Influencing government policy**

- Recommendations shared with the government to enhance the transparency of a new relief fund *(Himmit Watan)* and to incorporate strong anti-corruption policies; 80% of recommendations were adopted
- Awareness raising through accountability session at the end of the year
- IJ report published on access to information accompanied by another legal review analyzing the amending law approved by the cabinet
- Anti-corruption online legal clinic composed of law students and young lawyers launched, trained by TI-JO
- ALAC team developed awareness materials and messages to be communicated during the election season covering corruption, voter buying and any breaches.

**Capacity building with CSOs**

- Partnered with a local designer for info-graphs on the position paper for the public and CSOs.
- Training material developed for upcoming online training in November.

**Research**

- A legal review on the anti-corruption law amendments (pending publishing) was drafted.
- A legal review on the Audit bureau law amendments was drafted
- The transparency of the government in the first month of the response tracked.
- The IJ report accompanied by the access to information legal review was drafted, reviewed and launched.

**Advocacy and ALAC**

- Position paper developed with expert, containing recommendations to the government,
- Preparation for a hearing session with the government.
- The Audit bureau as the first observation body of review for the legal clinic identified.

**Awareness raising**

- 44 new volunteers recruited for the awareness campaign and the election observation.

**Programme management**

- ALAC closed two investigative cases together with two journalists
5.2 Lebanon

- An agreement with the Anti-corruption commission for reporting corruption cases through the Yalla nsolef website was reached
- The Yalla nsolef website revamped and updated with new materials.
- A call for applications for the IJ reports 2020 published.

### Project activities

<table>
<thead>
<tr>
<th>Sept - Dec 2018</th>
<th>Progress towards objective</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Network building- CSOs</strong></td>
<td></td>
</tr>
<tr>
<td>• Launch workshop with CSOs</td>
<td></td>
</tr>
<tr>
<td><strong>Advocacy and ALAC</strong></td>
<td></td>
</tr>
<tr>
<td>• Rebuilding and strengthening of the visibility and outreach capabilities of the ALAC</td>
<td></td>
</tr>
<tr>
<td>• Advocacy with Ministries for Social Affairs, Education, Energy and Water;</td>
<td></td>
</tr>
<tr>
<td><strong>Programme management</strong></td>
<td></td>
</tr>
<tr>
<td>• Team members hired for the ALAC (legal advisor and legal assistant)</td>
<td></td>
</tr>
<tr>
<td>Jan - Dec 2019</td>
<td></td>
</tr>
<tr>
<td><strong>Network building- CSOs</strong></td>
<td></td>
</tr>
<tr>
<td>• Official formation of the national budget monitoring coalition;</td>
<td></td>
</tr>
<tr>
<td>• partnership established and workshop organised with with Basil Fuleihan Institute(^{17});</td>
<td></td>
</tr>
<tr>
<td>• Two-day workshop for CSO coalition focussing on good governance, anti-corruption, budgeting and public money management;</td>
<td></td>
</tr>
<tr>
<td>• three meetings with the CSO coalition to map the process guidelines and priorities and to agree on a visual identity;</td>
<td></td>
</tr>
<tr>
<td>• 3-day workshop on public budget;</td>
<td></td>
</tr>
<tr>
<td><strong>Advocacy</strong></td>
<td></td>
</tr>
<tr>
<td>• publication of a position paper by LTA and 6 CSOs; policy paper on public budget;</td>
<td></td>
</tr>
<tr>
<td>• ALAC stepping beyond legal consultations to promote access to information and its effective implementation on the national level</td>
<td></td>
</tr>
<tr>
<td><strong>Programme management</strong></td>
<td></td>
</tr>
<tr>
<td>• LTA developed a communication plan; new Facebook page created for the ALAC on which</td>
<td></td>
</tr>
</tbody>
</table>

\(^{17}\)Lebanese center of excellence that contributes to national capacity development in public financial management and governance. See [www.institutdesfinances.gov.lb/](http://www.institutdesfinances.gov.lb/).
### January - September 2020

#### Network building - CSOs
- Meetings of coalition to Monitor and Ensure transparency in the donations, re-construction efforts and investigations that are now in order due to Beirut Port Explosion.
- Online CSO Capacity Building Platform launched to support transparency in relief efforts

#### Advocacy
- Mouwazana coalition released a statement in April targeting the Lebanese Government to remind it of the timeline and deadlines related to the state budget, as this was removed from the government’s priority
- LTA promoted the need for reforms especially in terms of laws related to Access to Information, Public Procurement and the National Anti-Corruption
- Pushing for the amendment of the Public Procurement law, working with the relevant joint parliamentary committee to include CSOs in stakeholders’ consultation
- Video Conferences with parliamentarians (or parliamentary advisors to MPs)
- Video conference with the head of the Bassel Fleihan Institute of Finance at the Ministry of Finance.
- A second video conference was conducted with the General Director of the Ministry of Economy
- Annual accountability session to discuss the challenges and achievements of compliance with transparency guidelines in the Beirut Relief and reconstruction efforts
- Infographics, short and long informative videos shared and planned for production on a number of themes affecting budget; speakers have been selected
- Policy paper assessing the government response to the Covid 19 crisis in both (financial and administrative aspects) prepared with a health expert
- Policy paper on Amendment of Illicit Enrichment law developed with a judge

#### Programme management
- Call for expert for a policy paper assessing institutional and governance corruption risks affecting the budget shared

#### Advocacy - Influencing government action
- Law on “Fighting corruption in the public sector and the establishment of the national anti-corruption commission" was approved in April 2020; reflecting LTA advocacy
- The Access to Information (ATI) implementation decree was adopted in Sept 2020; LTA’s input and recommendations were included in the decree.

#### Contributing to raising citizens’ voices through
- providing a platform for citizens to report any case or risk of corruption.

#### Increasing the evidence base on corruption through
- investigative actions; infographics

#### Strengthened visibility of corruption issues through
- awareness raising campaigns on social media
5.3 Morocco

### Project activities

#### Sept - Dec 2018

- **Network building- CSOs**
  - Outreach to CSOs with an invitation to be part of the network;
- **Programme management**
  - Start drafting ToR;
  - Start hiring process for three trainers
- **ALAC**
  - ALAC received and registered two cases
  - ALAC procedures on accepting corruption cases revisited;
  - History and relevance of local ALACs reviewed

#### Jan - Dec 2019

- **Network building- CSOs**
  - Coordination meeting with 14 CSOs;
  - Public finances training workshop with 8 CSOs;
  - Workshop on local and national taxation with 10 CSOs;
  - Selection of CSOs to conduct budget monitoring completed;
  - Workshop on good practices in budget transparency with 8 CSOs
  - ALAC received 41 complaints;
  - ALAC organised a meeting with the Ministère Public (office of the attorney-general), resulting in a much more direct line with the judiciary to shorten procedural time for cases
  - Local budget workshop with 7 local CSOs;
  - Local access to information workshop with 15 local CSOs;
  - Local finance workshop with 11 CSOs;
  - 10 CSOs trained to evaluate budget transparency in OGP framework
- **Advocacy**
  - National public sector meeting with amongst others representatives from the Ministry of Health, Ministry of Finance, Public Office

### Progress towards objectives and outputs

#### Sept - Dec 2018

- **Strengthening the evidence base through**
  - Internal review and study carried out on key project themes tailored to the legal context of Morocco;
- **Strengthening the ALAC through**
  - Strengthening of the visibility and outreach capabilities of the ALAC

#### Jan - Dec 2019

- **Strengthening the evidence base through**
  - Parallel study on court rulings with a corruption angle conducted;
  - Three national scoping sessions with CSO coalition to write an analytic summary on budget transparency in the public health sector;
- **Strengthened the capacity of CSO partners through**
  - Training and meetings at local and national level
- **Strengthened the Network of CSOs through**
  - Officially forming National budget monitoring coalition and supporting engagement between members
- **Increased the visibility of corruption issues through**
  - Awareness-raising and media campaigns
- **Raising citizens’ voices (ALAC)**
  - ALAC continued to have a positive impact, promoted civic responsibility and participation; produced additional public resources
  - Local level strengthened by supporting the growth of a strong civil society through workshops and meetings
  - Guide produced on participatory budgeting;
  - Budget allocated to public health analysed by TI Morocco and CSOs and analytic summary written
5.4 Tunisia

<table>
<thead>
<tr>
<th>Project activities</th>
<th>Progress towards objectives and outputs</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Sept - Dec 2018</strong></td>
<td><strong>Network strengthening - CSOs</strong></td>
</tr>
<tr>
<td>5 workshops in 5 governorates organised which helped identifying IWatch potential partners for the CSO coalition;</td>
<td>Built a sense of commitment and ownership of the project's goals;</td>
</tr>
<tr>
<td>Partner organisations to work on budget monitoring identified and trained;</td>
<td><strong>Raising citizens' voices</strong></td>
</tr>
<tr>
<td><strong>Strengthening evidence base</strong></td>
<td></td>
</tr>
<tr>
<td>research started on the new local governance code</td>
<td>ALAC team visited 6 governorates in Tunisia to meet with citizens to explain the new whistle-blowers</td>
</tr>
<tr>
<td><strong>ALAC</strong></td>
<td></td>
</tr>
</tbody>
</table>
• ALAC organised 5 events in interior regions called “Coffees Against Corruption” to raise awareness, explain ALAC’s work and how citizens can report

**Programme management**

• Brainstorming session with project team members;
• ALAC team coordinator recruited;

**Protection law and the access to information law to** citizens and to receive corruption reports from them.

**Strengthening evidence base**

• ALAC team using the access to information law to get information from the public institutions in Tunisia.
• In 2018, over 200 of access to information requests have been sent to public institutions. In most of the cases, I WATCH has received an answer from the concerned institutions.

**Jan - Dec 2019**

**Capacity building- CSOs, policymakers and citizens**

• Two trainings on local governance and access to information aimed at local CSOs and citizens; four workshops on ATI and local governance aimed at local youth;
• Multiple local training courses and informative sessions for municipalities and civil society activists across the country;
  ○ a local municipal council meeting, including a field visit;
  ○ regional training on Local Governance, Financial Transparency and Anti Corruption measures;
  ○ local “speed debate” between local authorities’ representatives (LAR) and local civil society activists and citizens;
  ○ ALAC team visited IWatch regional offices to inform about ALAC work and processes of reporting corruption cases;
  ○ local Kids against Corruption trainings and workshops;
  ○ regional office presented IWatch’s work and corruption issues at a local high school;
  ○ three local “Coffee against Corruption” Anti-Corruption Gatherings;
  ○ two awareness-raising sporting demonstrations under the name Riders against Corruption;
  ○ national cultural competition activity “Slam the corrupt”

**Raising citizen’s voices**

• ALAC has supported corruption cases and strengthened citizens’ knowledge about possibilities for addressing corruption

**Raising the visibility of corruption issues**

• Through outreach to several communities including youth, citizens’ gatherings and cultural initiatives

**Strengthening the skills of law students**

• through training law students in legislative drafting

**Influencing government policy**

• The Chapter has strengthened its relationships with local communities and institutions
• Citizens’ capacity-building through gatherings and cultural activities

**Influencing public policies and practices**

• municipalities meters tool prepared designed for 8 municipalities to monitor the promises
of the elected municipal councils’ members;

- 8 municipalities selected where the coalition of civil society organizations will be monitoring the budgets and the implementation of the projects at the local level;

- Convention signed with 2 municipalities which will support coalition members with monitoring the municipalities’ budgets and projects;

**Strengthening evidence base**

- legal research on Mabrouk case, Ben Ali’s son-in-law

**ALAC- increasing visibility**

- The ALAC team opened 69 corruption cases, four were resolved and closed; held four field visits to meet with local whistleblowers and to promote ALAC’s work;

- created a blog open for journalists and activists to write about corruption in Tunisia but did not launch it yet

- Report on access to information

**Network building- CSOs**

- IWatch built a coalition of 8 partners who will be observing the budgets and the implementation of projects of 8 different municipalities;

**Programme management**

- IWatch team travelled to Morocco to receive a training on budget monitoring delivered by TI-Palestine;

Jan - Sept 2020

**Capacity building- CSOs, policymakers and citizens**

- A set of training courses and informative sessions held in two governorates;

- 7-day training on local governance and anti-corruption;

- Series of activities with pupils for “Kids against Corruption”;

- Local high school training and simulation with citizenship club members;

- Coffee and Breakfast against Corruption meetings held

- National Lawathon competition held with 20 law students;

- National Al-Kadhi (The Judge) competition on issuing a judicial decision;

**Raising the visibility of corruption issues**

- Through outreach to several communities including youth, citizens’ gatherings and cultural initiatives

- Increased involvement of social groups with anti-corruption initiatives

**Strengthening the skills of law students**

through organising a Lawathon focused on transparency in politics.
5th edition of the IWatch/ALAC moot court organised;
Three cultural activities to tackle corruption: Movies, Slam and Theater against Corruption.
Monthly newsletters

ALAC
ALAC representatives and legal advisors visited IWATCH regional offices to facilitate informative sessions;
ALAC received 98 reports out of which 4 are before the administrative court, 8 penal cases filed. 103 access to information requests filled out and sent and 4 verdicts from the Authority of Access to Information were appealed before the administrative court.

6 ANNEX II CONTEXT ANALYSIS BY COUNTRY - BUDGET TRANSPARENCY AND PARTICIPATION

6.1 Jordan

Country context - political developments in the past 2 years

Rasheed, the National Chapter of TI in Jordan, has been part of the monitoring the Open Government Initiative (OGP) initiative since its establishment in 2011 through a committee. This initiative has contributed to more government transparency and formed the JIACC (Jordan Integrity and Anti-Corruption Commission). Rasheed has signed MoU with the JIACC and works together closely to deal with corruption cases in Jordan.

Right before the start of the project, in May 2018, Jordan faced significant nation-protests and uprisings coined as the “4th Circle Movement”, “Youth Movement”, or “June Uprising”. Tens of thousands of activists, young people, CSOs and regular citizens took to the streets to protest the government’s economic policies and the rampant corruption in the public sector. These protests resulted in the resignation of the then Prime Minister Hani AlMulki, and the appointment of Omar Razzaz as the new Prime Minister. Omar Razzaz is a former senior World Bank official and has a long history in government reform, particularly within the fields of education and social security. Razzaz made significant changes and bold moves to address the problem of corruption together with citizens. For instance, he submitted his family’s financial disclosure documents and instructed his ministers to do the same. Furthermore, he promised high levels of government transparency and announced major political and economic reforms. This might indicate a change in the environment in which TI advocates.

The following months were marked by a significant legal change: following parliament discussions, the state budget 2019 was passed through the General Budget Law. This is an important step as it allowed Rasheed and CSOs to audit and review the transparency of the state budget and its components in Sharaka2 meetings and training. In the same year, the Jordanian government took an important step to address a corruption case in the tobacco industry, involving ministers, high-level officials and 19 companies and an estimate of 155 Million Jordanian Dinars (JOD) worth of tax-evasion. Having received much public interest, eight ministers were replaced. The JIACC has also been busy with corruption cases, and announced a
recovery of 350 million JOD from processed cases, and sent more than 60 law amendments to the cabinet and parliament. These cases have increased the visibility of corruption in the country.

Finally, King Abdullah II aimed for at significant budget cuts, by for instance merging the public security forces with the Gendarmerie and civil defense under one administration instead of three. However, the budget process has seen significant delays in 2019 and 2020.

Country context - Budget transparency and participation

Jordan is the first Arab country to adopt a right of access to information law – the Access to Information Act No. 47 of 2007. Article 13 of Jordan’s Access to Information Act provides for the right to information, which includes disclosure of information possessed by public bodies. This is fundamental for accountability and fighting corruption as it enables Jordanian citizens to access official fiscal documents like budgets, minutes of meetings setting out fiscal policy intentions and general information on public sector accounts.

One of the main aims of the Act is to promote transparency and participation in decision-making by facilitating access to information by Jordanians and regulating its implementation through the ‘Information Council’. The Council is an institution established under the Act to ensure provision of information to persons making such requests as well as the receiving of complaints if requests from the public to the relevant public bodies are refused. The Act is a key instrument in promoting fiscal transparency and participation as citizens and civil society organisations can request for the disclosure of budgets and other fiscal documents of public bodies and scrutinise these to check whether there has been misappropriation of funds.

Nevertheless, the Act has various shortcomings limiting transparency and citizen participation. Firstly, same as in Morocco, a main criticism of Jordan’s Access to Information Act is that there is no proper guidance on mechanisms for classifying government documents containing information that should not be disclosed as per the exceptions in Article 13. As per this article, public bodies may reject requests for disclosure of information related to national security, individual privacy, preservation of the rights of others, intellectual property rights and preservation of public morals and health. This vague exception is susceptible to abuse in terms of public bodies having wide discretion to interpret it broadly to classify information that should rightly be disclosed to the public as falling within the exceptions, especially fiscal information revealing abuse of state resources or other fiscal malpractices. Such vagueness is one of the reasons why the Act scored 52 out of 150 points in an access to information rating by the Center for Law and Democracy and Access Info Europe. The capacity of the vague exception to be interpreted broadly is further exacerbated by the existence of Jordan’s Law on Protection of the State’s Secrets and Documents’ broad definition of secret state information as ‘any protected information or document that may defame an official figure or abuse status of the state’. This thus tends to preserve the state’s secrecy provisions, greatly narrowing the reach of the duty to disclose in the Access to information Act.

Secondly, the fact that the decisions of the Council are not binding and officials of the Council mainly being top government officers—with the chair being the Minister of Culture and other members including the Ministry of Interior’s Secretary General and Director of National Guidance in the Armed Forces—has

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discouraged persons whose requests for information have been refused by public bodies from filing complaints with the Council. This has also led to the Council’s independence being highly questioned.\textsuperscript{23}

Thirdly, the Act does not provide for proactive/automatic disclosure by public bodies of key information of public interest like budgets as in Tunisia and Morocco, which is in line with current international practice.\textsuperscript{24}

Lastly, it has been rightly argued that the Act needs various amendment to better ensure transparency and accountability of public bodies: (a) amendment so that it includes both fiscal and disciplinary penalties for officials who unreasonably refuse to provide requested public information; (b) amendment to allow legal entities and foreigners, not just Jordanian citizens as it currently stands, to be capable of making requests for disclosure of public information; and (c) an amendment that broaden the applicability of the duty to disclose information to not just public bodies but also private bodies that receive substantial funding from public coffers.\textsuperscript{25}

On budget transparency, specifically, Jordan has a score of 60, which is the minimum yardstick for providing sufficient levels of information to support informed public debate. This signals a relative lack of budget transparency in the country further illustrated by recent protests against corruption, increasing inequalities and other government failures.\textsuperscript{26} Something to watch out for in the coming days is how Jordan’s recent commitment to key structural and regulatory economic and financial reforms on public procurement, public-private partnerships, among others, could contribute to greater budget transparency. Such reforms have already led to Jordan being listed as one of the World Bank’s top performers in its 2020 Doing Business report.\textsuperscript{27}

6.2 Lebanon

Country context - political developments in the past 2 years

Lebanon has a generally complex political system given its ethnically and religiously diverse demography, which makes the operational context more challenging. The country has always been subject to various risks, such as a fragile political setup, economic deterioration and security threats due to its geographic positioning. The country also suffers from high levels of unemployment, especially amongst the youth, and hosts the highest number of refugees per capita. Nevertheless, at the start of the programme, the Lebanese parliament ratified a budget (2017-2018) for the first time in twelve years. Together with the Ministry of Finance's online publication of the Citizens' budget and the recent passing of the Access to Information law, LTA was presented with a significant political opportunity to maximise impact through Sharaka2 and to push for fiscal transparency and budget participation. While it took 9 months to form a government in January 2019, the new cabinet made important promises to tackle corruption and advance structural reforms. In addition to the cabinet, the Lebanese parliament also made progress. It recently endorsed the National Anti-Corruption Commission law which has a large scope in detecting, preventing and combating corruption. The Commission will be investigating and prosecuting cases in addition to offering protection and financial and legal incentives to whistle-blowers.

However, while there were positive promises and corruption was on the political agenda, there were no concrete decisions or implementations to tackle the issue. This amounted to rising public discontent until almost one third of the Lebanese population took to the streets in October 2019. With further taxes added

\textsuperscript{23} Yahya Shuqeir, Access to Information in the Arab World: Focusing on Jordan, Tunisia and Yemen (Arab Reporters for Investigative Journalism, 2019) 15-16.
\textsuperscript{24} Toby Mendel, Jordan: Analysis of Law No. 47 for the Year 2007 Guaranteeing the Right to Obtain Information (UNESCO, 2016) 1 & 10.
and rampant corruption, citizens across sectarian groups and political affiliation called on their ministers and political representatives demanding radical change in the ruling class. All of this provided a significant momentum for LTA to advance Sharaka2 and the overall messaging of the need to empower civil society to tackle corruption.

The horrific Beirut Port explosion in August 2020 shook the country and destroyed most of the capital. The explosion also forced the government of Hassan Diab to resign given the causes of bad governance and lack of transparency. Despite this background, the anti-corruption agenda made progress. Before the explosion in April, Diab’s government implemented four immediate measures to combat corruption and recover stolen assets. In September, the Access to Information law was adopted by the new government. Furthermore, the parliament set three important anti-corruption laws on its agenda: National Anti-corruption commission, Access to Information, Illicit enrichment and lifting banking secrecy. Finally, LTA took part in the Ministry of Justice task force working on anti-corruption legislation.

Country context- Budget transparency and participation
There have been mounting protests in Lebanon. This is in the wake of endemic corruption as the state is reported to lose about 9 percent of its annual GDP to this and other inefficiencies of public administration. The protests were further fuelled by, inter alia, the increase in taxes, cut backs on safety nets and deteriorations in socio-economic conditions, with the people demanding transparency, accountability and effective participation in the management of public resources. Notably, according to the 2019 Open Budget Survey, Lebanon’s transparency score is 6/100, participation 0/100 and budget oversight 18/100, confirming the country’s dismal performance in all the three areas.

Lebanon has recorded worryingly low scores on transparency despite the 2017 Lebanese Access to Information Act. This necessitates an analysis of the effectiveness and adequacy of the Act which is the first extensive law on the right of access to information in the country. Public bodies subject to the Lebanese right of access to information include public companies, mixed companies and private law companies managing a utility or a public domain. This means that the law has a wider reach than that of Jordan, for instance, which strictly applies to public bodies. Claims against a public body’s refusing to disclose requested public information, as provided for in the Act, are to be filed with the Anti-Corruption Authority. Accordingly, the Lebanese Anti-corruption Authority has the task of ‘issuing opinions to the competent authorities and of contributing to cultivate the citizens in the field’. The Authority rules on lawsuits in two months from the date of their receipt, it informs the competent administration of its decisions and the latter can be appealed by the administration to appeal to the State’s council.

6.3 Morocco

31 Yahya Al-Shugair, Access to Information in the Arab World, Policy Paper. This study was prepared by Areej, p. 16
32 Saeed Al-Madhoun, Previous Reference, P.11.
33 Chapter 14
Country context - political developments in the past 2 years
In Morocco, the government joined the Open Government Partnership in April 2018. This presented a political opportunity for TI and TM to call for more transparency at the government level. The Moroccan budget was ranked as the second most transparent in the MENA region by the Open Budget Survey for 2017 conducted by the International Organization for Fiscal Partnership (IBP). Opportunities for citizens to engage with the budgeting process however stay very limited.\(^{34}\)

Additionally, the Moroccan parliament passed an access to information law in accordance with the Moroccan constitution shortly before the start of Sharaka2 (entered into force March 2019). The law was heavily criticized by civil society and TM has been campaigning for its reform. These two factors have guided the design of the programme in Morocco.

During the programme, The Ministry of the Economy and Finance took steps to disseminate information on public finances, as well as the publication of the citizen’s budget and the continuous improvement of its content, making it possible to offer citizens a concise overview and simplified public policy data. The country took steps to fight corruption and made legislative reforms to increase transparency and integrity.

Corrupt practices are sanctioned by the Penal Code and citizens who are victims or witnesses have an outlet to denounce corruption and seek redress. In December 2018 Mr. Mohamed Bachir Rachdi, former Secretary General of Transparency Morocco, was appointed as the head of the national Body of Probit.\(^{35}\)

Country context - Budget transparency and participation
The amended Moroccan Constitution provides for the RAI in Article 27, which states (as per its English translation):

The citizens [feminine] and citizens [masculine] have the right of access to information held by the public administration, the elected institutions and the organs [organismes] invested with missions of public service.

The right to information may only be limited by the law, with the objective [but] of assuring the protection of all which concerns national defense, the internal and external security of the State, and the private life of persons, of preventing infringement to the fundamental freedoms and rights enounced in this Constitution and of protecting the sources and the domains determined with specificity by the law.\(^{36}\)

This provision, along with Morocco’s ratification of the Right to Information Law (31.13) in 2018 and it’s coming into force in March 2020, is said to be a positive step towards ensuring ‘public access to information, asset declarations by public officials, fiscal transparency and citizen participation’ – the four key principles of the Open Government Partnership (OGP), which Morocco is a member of.\(^{37}\)

Morocco’s RAI Law 31.13 gives persons in the country the right to access information in the possession of public bodies by submitting an application, for free, to the concerned public body requesting disclosure of information. Requests made are to be responded to within twenty working days, but this is not in all

\(^{34}\) Narrative report Y1Q1

\(^{35}\) Narrative Report Y1Q1


instances of request for information. Accordingly, for information that is urgently required, say for protection of lives or public safety, this should be provided within three working days.\textsuperscript{38}

Penalties meted out to public officers for failing to respond to requests for disclosure of information are set out in Article 19. These include such officers being subjected to disciplinary actions. This provision has been criticized for not providing adequate sanctions for public officers who destroy, change or fail to furnish requested information.\textsuperscript{39}

Notably, the limitation of the application of the RAI in Article 27 of the Moroccan Constitution and Article 7 of Law 31.13 – on issues related to national defense, the state's internal and external security, privacy of individuals and fundamental rights and freedoms – has been criticized for being overbroad, to the extent that it empties the provision of its substance.\textsuperscript{40} This is particularly because the exceptions are undefined which open them up to biased interpretation by public officers when they are unwilling to disclose public information that does not serve their interests.\textsuperscript{41} For this reason, the RAI in Morocco has been argued to be 'largely dependent on the government’s commitment to transparency and political will to enforce it', which are reported to be largely lacking, particularly when information concerned may reveal mismanagement or misuse of public funds.\textsuperscript{42} Illustrating this point, it is reported that, as much as Law 31.13 requires municipalities to avail their financial data online, few of these have shared their budgets online, at least as of September 2020.\textsuperscript{43} This obstacle is further buttressed by ‘the prevailing institutional culture of retaining information and the increasing closure of the civic space and crackdown on opposing voices’ in the country.\textsuperscript{44}

6.4 Tunisia

Country context - political developments in the past 2 years

Before the start of Sharaka2, Tunisia, the mounting pressure from the international society on the government contributed to passing of a law on the denunciation of corruption and the protection of whistle-blowers. I-Watch, TI’s national chapter, has also been monitoring the government’s implementation of the access to information law as well as raising citizen’s awareness on the right to public information.

Tunisia saw municipal elections in 2018 and national (legislative and presidential) elections in 2019. These processes have led to a lag in the drafting and implementation of new policies related to anti-corruption. While the country has anti-corruption laws, implementation of these continues to be insufficient.\textsuperscript{45}


\textsuperscript{39} Marwa Fatafa, ‘Five ways access to information falls short in Morocco’ Voices of Transparency (23 May 2018) <https://voices.transparency.org/five-ways-access-to-information-falls-short-in-morocco-844c236a1c0>.


\textsuperscript{41} Marwa Fatafa, ‘Five ways access to information falls short in Morocco’ Voices of Transparency (23 May 2018) https://voices.transparency.org/five-ways-access-to-information-falls-short-in-morocco-844c236a1c0.


Country context - Budget transparency and participation

Article 32 of the 2014 Tunisian Constitution provides that ‘The state guarantees the right to information and the right of access to information and communication networks.’ The provision strengthened the value of the right by giving it better protection from the one provided in Law-Decree n°11-2011. It is reported that this 2011 political decree on access to public documents was largely unknown, and that few requests were made under it. The said decree was a major feature of the Tunisian revolution outcomes as Tunisia began to establish the foundations of democracy such as accountability and transparency. To give effect to this constitutional right, Tunisia’s Access to Information Law was adopted in 2016 (n°2016-22) – the first of its kind in the country – providing larger protection of the RAI and creating the Access to Information Authority (known by its French acronym INAI), which started its mission in 2017. This law is said to require public bodies to disclose a wider range of information automatically, and others upon request, than RAI laws in the other Arabic countries of focus – Morocco, Lebanon and Jordan. The process of making requests for disclosure of information is relatively simple and user-friendly. This is for various reasons: 1) no fees are to be paid for the filing of requests for information; 2) there is a standard form to be filled for such requests, which makes the process relatively easy; 3) a person need only give their basic information like their name, address, the request they are making and the address and details of the body that is being requested to disclose information; 4) the filled request form can be submitted via post, fax, e-mail or in person to the public body being requested for information; 5) one need not state the reasons for requesting the information or interest in obtaining it; and 6) requests for information are to be responded to in a timely manner, if there is no response to a request within 20 days, this is considered as refusal and is a ground for appealing to the INAI.

Tunisia’s RAI legislation has greatly strengthened the right of persons in Tunisia to get access to information that is in the hands of public bodies, promoting government transparency and accountability. This is illustrated by the fact that, as of February 2019, the INAI is reported as having received more than 600 requests for disclosure of information from which it had issued over 200 rulings. Further, it is observed that of the rulings given, two thirds of them were in favour of the persons requesting disclosure of information and 8 percent of all the requests made were fulfilled, even before the Authority issued its

46 See Decree No. 41 of 2011 dated May 26, 2011 regarding access to administrative documents of public structures.

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7 ANNEX III LIST OF INTERVIEWEES

<table>
<thead>
<tr>
<th>Country</th>
<th>Interviewee</th>
<th>Position</th>
<th>Organization</th>
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</thead>
<tbody>
<tr>
<td>Palestine</td>
<td>Majdi Abu Zaid</td>
<td>Executive director</td>
<td>TI Palestine</td>
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<tr>
<td></td>
<td>Hama Zeidan</td>
<td>Head of advocacy</td>
<td>TI Palestine</td>
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<tr>
<td></td>
<td>Issam Haj Hussein</td>
<td>Head of Operations</td>
<td>TI Palestine</td>
</tr>
<tr>
<td>Jordan</td>
<td>Majd Shahattit</td>
<td>Projects Coordinator</td>
<td>TI Jordan - Rasheed</td>
</tr>
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<td></td>
<td>Emad Al Quraan</td>
<td>Legal Advisor</td>
<td>TI Jordan - Rasheed</td>
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<td></td>
<td>Lamees Al-Sabatin</td>
<td>Legal Assistant/ALAC Communications</td>
<td>TI Jordan - Rasheed</td>
</tr>
<tr>
<td></td>
<td>Lina Haddad</td>
<td>Activist</td>
<td></td>
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53 ibid.
56 ibid.
60 Art. 19 ICCPR.

However, a major criticism raised with regards to Tunisia’s progressive RAI laws, is on their implementation. Accordingly, one key observation made by various RAI stakeholders is that some public bodies in the country often fail to comply with requests for disclosure of information, despite the law imposing a fine against public officers who fail to comply with RAI requests and the meting out of disciplinary sanctions.54

Exceptions to the obligation to disclose information are set out in article 24 of Tunisia’s 2016 access to information legislation. The article provides that ‘a public body can reject a request, which might result in prejudice to national security or defence, to international relations related to these, or to third party rights such as to the protection of private life, personal data, and intellectual property’.55 However, article 26 continues to provide that ‘The fields listed are not considered as absolute exceptions to the right to information and shall be subject to a prejudice test. The damage shall be substantial and encompass current and future damage’.56 Accordingly, the burden of proving this lies with the public body claiming the requested information falls under the list they are not obliged to provide and, a person dissatisfied with the public body’s response in rejecting the request may appeal to the INAI.57 A convincing argument made is that this exception does not apply to ‘information the release of which is necessary for the purpose of revealing serious human rights violations or war crimes or investigations linked to them or the prosecution of their preparations’.58

Aside from the national laws guaranteeing the RAI, Tunisia is also a party to the ICCPR – having signed and ratified it in 1968 and 1969 consecutively59 – which provides for the RAI in Article 19. State parties to the Covenant, like Tunisia, are obliged to respect, protect, provide and fulfill the right ‘to seek, receive and impart information and ideas of all kinds’ for persons in their jurisdictions.60
8 ANNEX IV LIST OF DOCUMENTS REVIEWED

- Programme proposal, 22 June 2018
- Programme Logframe 22 June 2018
- Narrative reporting - Semesterly narrative reports from all programme Chapters
- Programme outputs from all Chapters
- Narrative briefing on impact from Morocco, Lebanon Jordan Chapters
- Study on Budget Transparency in the MENA Region
- Study on Access to Information in the MENA Region