Transparency International (TI)
Evaluation of the Accountable Mining Programme (AMP)

Evaluation Report

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in cooperation with Helen Russell (SROI)

Submitted on 15 June 2021

This is an external evaluation. The contents represent the view of the evaluators and do not necessarily reflect the views of AMP, TI or the funding institutions.
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## Abbreviations

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<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>AAMEG</td>
<td>Australia-Africa Minerals &amp; Energy Group</td>
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<td>AMP</td>
<td>Accountable Mining Programme</td>
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<td>BHPF</td>
<td>BHP Foundation</td>
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<td>BO</td>
<td>Beneficial Ownership</td>
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<td>CSO</td>
<td>Civil Society Organisation</td>
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<td>DAC</td>
<td>Development Assistance Committee of the OECD</td>
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<td>DFAT</td>
<td>Department of Foreign Affairs and Trade</td>
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<td>GTNI</td>
<td>Global Thematic Network Initiatives</td>
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<td>M4SD</td>
<td>Mining for Sustainable Development</td>
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<td>MACRA</td>
<td>Mining Awards Corruption Risk Assessment</td>
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<td>MEL</td>
<td>Monitoring, Evaluation &amp; Learning</td>
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<td>OECD-DAC</td>
<td>Organisation for Economic Co-operation and Development (OECD)/Development Assistance Committee (DAC)</td>
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<td>SROI</td>
<td>Social Return on Investment</td>
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<td>TI-A</td>
<td>Transparency International Australia</td>
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<td>TI-S</td>
<td>Transparency International Secretariat</td>
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Executive Summary

The subject of this evaluation is the ‘Accountable Mining Programme’ (AMP) (03/2018 – 12/2021), previously referred to as ‘Mining for Sustainable Development (M4SD)’ programme.

The programme was funded by the BHP Foundation (BHPF) and the Australian Government through the Department of Foreign Affairs and Trade (DFAT). The evaluation was mandated by Transparency International Secretariat (TI-S) upon request by BHPF. The evaluation was conducted between February and April 2021. Due to restrictions related to COVID all meetings, 38 interviews and 5 workshops with 46 stakeholders were held virtually.

The AMP operated within the strategies of BHPF and DFAT. To achieve the objective (‘Mining’s contribution to sustainable development is enhanced by increasing transparency, accountability and effective regulation in processes for awarding mining permits, licences and contracts.’), the programme worked on global, national and partially on subnational intervention levels. It targeted stakeholders in the global anti-corruption movement and stakeholders in 18 countries on national and sub-national level of governments as well as private sector, civil society and mining-affected communities. At the time of the evaluation, the programme worked with 18 participating TI chapters in Asia/Pacific, Eurasia, Africa, North and South America.

The AMP managed to identify and keep the focus on one area (‘awarding mining permits, licences and contracts’) through evidence-based advocacy in the mining value chain based on strong, innovative and widely accepted research informed by the Mining Awards Corruption Risk Assessment (MACRA) tool. The programme had the ability to leverage activities and collaborate with industry as a critical, but solution-oriented, trusted and competent stakeholder. There is good evidence from documents and stakeholder statements that AMP has established TI as one of the leading organisations on the topic of corruption in mining, being the only organisation bringing forward research and evidence-based advocacy on the corruption challenges at the licensing stage. The AMP interacted, formed partnerships and organized joint activities with the main advocates for change in the industry and with the governments, as well as with NRGI, Oxfam and CSO coalitions of PWYP or the multi-stakeholder initiative EITI.

The programme leveraged and partnered with other initiatives and programmes effectively and brought to the forefront credible examples using first-hand chapter expertise, e.g. to thematic, national or global fora (debates on gender in mining, business integrity, beneficial ownership, among others). The global team has invested extensively in building the capacity of participating chapters in regard to processes, e.g. documentation and reporting, advocacy and strategy building, communication, and financial reporting. This was done through bilateral direct support to chapters, capacity building sessions at the global programme workshops, in-country missions and webinars. The efforts were undertaken in close consultation with TI’s Regional Advisors for the respective chapters, and coordinated with other GTNI’s to ensure that AMP’s activities add value to the overall work of the participating chapters. The programme built on a high level of proficiency for online outreach activities as well as online communication and engagement with chapters and the global TI network (even before COVID changes in March 2020).

The results of the MACRA research have been the centerpiece, where systemic, regulatory and institutional vulnerabilities to corruption in awarding mining licences, leases and contracts were identified. The transfer from research to advocacy is clearly documented and supported by stakeholder statements across all groups. The aspect of ownership by chapters was observed and
strengthened. The lead for in-country implementation has been with TI chapters. They have proven to be intertwined in the anticorruption movement, multi-stakeholder groups and coalitions that ensured regular touch with communities and vulnerable groups in the mining areas in the three country cases selected for this evaluation (Australia, Sierra Leone and Zambia) and beyond.

However, the short time frame for implementation limited the opportunity for impact as changes to legislation and processes take time. For the five countries that joined the programme in 2018, the time was especially short with only a year to implement their advocacy strategies which for some was insufficient to gain traction to contribute to measurable impact. The challenging geographical (and time-zone) setup regarding workflows between the global team in Australia, secretariat in Germany and the majority of chapters and stakeholders in Africa as well as chapters in North and South America was to a certain extent mitigated by the dedication and high commitment of the global team and key stakeholders.

The partnership between the ‘CSO’ (TI) with the ‘industry’ (BHP Foundation) received much visibility and approval and has been widely perceived as a strength. However, some identified this funding partnership as a weakness and potential risk to the credibility of the AMP.

Overall, the evaluation assesses the programme as ‘moderately successful’. The assessment is based on the selected criteria: effectiveness, impact and sustainability. The evaluators issue nine recommendations to the members of the TI global network in view of the BHPF funding for the programme coming to an end in June 2021. Under the BHPF contract, implementation activities ended in April 2021.
The Accountable Mining Programme at a glance

<table>
<thead>
<tr>
<th>The Accountable Mining Programme at a glance</th>
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<tr>
<td><strong>Project objective</strong></td>
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<td><strong>Project term</strong></td>
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<td><strong>Project value</strong></td>
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<td><strong>Funding party</strong></td>
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<td><strong>Lead executing agency</strong></td>
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<td><strong>Implementing organisations</strong></td>
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<td><strong>Target groups</strong></td>
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1. Evaluation objectives and questions

1.1 Evaluation objectives

The evaluation objectives are based on the ToR and evaluation inception workshop on 25 February 2021, and the subsequent inception report. Accordingly, the evaluation is guided by TI’s Impact Matrix methodology (see TI Impact Matrix) and the OECD evaluation criteria and guidelines and it follows the Ethical Guidelines for Conduct of Evaluations as set out by the Australian Evaluation Society.

1.2 Evaluation questions

The evaluation questions that have been applied can be found at the beginning of chapters ‘4.1 Effectiveness’, ‘4.2 Impact’ and ‘4.3 Sustainability’ (see Annex I for the complete evaluation matrix including analytical dimensions, data source, data quality and data collection).

During the inception workshop on 25 February 2021, the evaluators asked the programme team the question “What do you hope to get out of the evaluation”? Below is a selection of answers (verbatim), which provided additional guidance for the design and implementation of the evaluation:

- To identify where we can make improvements to project design and M&E in future so as to better capture impact
- For chapters to learn/be inspired to continue work on this topic
- Lessons for other organisations working on this topic
- To have concrete examples of where the programme has added value to the mining/ anti-corruption movement
- How sustainable are some of our actions and activities within the programme both from the chapter levels and the global scale
- Will be interesting to know how well the program has brought about the anticipated policy and behavioural changes in participating countries
- Learnings that could be used in future programs to identify program impact
- How can we better demonstrate our impact/advocacy at national and regional levels?
- To be able to have evidence of and consolidate results (and hopefully impact) across the programme
- To be able to demonstrate to donors that we are worth funding
- Better demonstrate our successful work to external stakeholders
- To be able to consolidate results across the 15+ chapters and evaluate the impact the programme
- To identify what we did well and what we need to improve on
- Make some firm links between the ToC and some of the chapter level results
- To identify whether we met our objectives
- To be able to articulate our impact and contribution
- To identify best practices and areas of improvement in terms of designing, implementing and managing a global programme like ours
- To see what we have done and which areas we can improve
- Understand what we did well and how we can replicate that in the future
- To honour the hard work over the last few years - successes and areas for improvement
- Lessons for TI-S for future programmes
- Understand if we can use SROI as an approach in the future- and how
- Some best practice case studies would be good
2. Object of the evaluation

2.1 Definition of the evaluation object

The Accountable Mining Programme (AMP) is the subject to this evaluation. AMP received two main lines of funding:

- BHPF provided a grant of EUR 6,087,395 to Transparency International Secretariat (TI-S) from 03/2018 until 06/2021.
- DFAT provided a grant of AUD 1.1 million to Transparency International Australia (TI-A) from 06/2018 until 12/2021.

Please note:
- TI-A participates in the AMP as a TI chapter, as well as the home for the global team of the evaluated AMP. The term ‘programme’ in this report refers to the AMP.
- The programme was rebranded in mid-term without conceptual changes and was previously (e.g. publicly and in the contracts with BHPF and DFAT) referred to as Mining for Sustainable Development (M4SD) programme.

Temporal delineation

03/2018 – 06/2021 (phase II, “advocacy phase”; learning and transition from preceding phase I “research phase”; distinguish a pre-COVID / COVID context where applicable)

Financial delineation

EUR 6.1 million is funded by the BHP Foundation (BHPF) and AUD 1.1 million funded by Australian Government through the Department of Foreign Affairs and Trade (DFAT) (budget of phase II).

Geographical delineation

20 TI chapters participated in phase I, of which 18 completed National Risk Assessment Reports using the MACRA tool. Of these, 16 chapters (except Armenia and PNG) prepared National Action Plans (NAP) for implementation in Phase II that address the priorities identified in their national reports. They are:

Australia, Cambodia, Canada, Chile, Colombia, DRC, Guatemala, Indonesia, Kenya, Liberia, Mongolia, Peru, Sierra Leone, South Africa, Zambia and Zimbabwe.

The programme has the following scope:

BHPF funded activities since 2018

1. Australia
2. Canada
3. Chile
4. Indonesia
5. Sierra Leone
6. Zambia
7. Zimbabwe

*BHPF MACRA Chapters- joined the programme in late 2018 to undertake the MACRA research in 2019*

8. Argentina
9. Ghana
10. Kyrgyzstan
11. Madagascar
12. Mexico

*DFAT funded Chapters since 2018*

13. Cambodia (received a small amount of BHPF funding in phase 2)
14. Kenya (received a small amount of BHPF funding in phase 2)
15. Mongolia

*Chapters that secured their own funding since 2018*

16. DRC
17. Liberia
18. South Africa

**Target group**

The intermediaries and beneficiaries are stakeholders in the following groups and described by the programme as follows:

*Governments* will benefit from residents and industry stakeholders having greater trust and confidence in government institutions and processes for awarding mining licences, permits and contract. This will happen when governments make transparent and accountable decisions about granting rights to explore and mine in the public interest based on sound land use and governance principles, including meaningful consultation and consent, and an understanding that mining decisions will impact differently on men and women. The programme advocates for governments to adopt, implement and enforce effective transparency and accountability policies, procedures and practices in approving mining permits, licences and contracts.

*Private sector stakeholders* including responsible mining companies, industry associations and investors, will benefit from improved decision-making and a level playing field. This will happen when mining companies make applications for mining licences/permits ensuring their own processes are corruption-free and based on genuine consultation with communities, championing transparency and accountability in mining approvals. This in turn will contribute to building public trust in the mining industry. The programme advocates for mining companies to adopt and effectively implement relevant transparency and
accountability standards and practices in relation to permits, licences and contracts for their operations, and act as champions to promote and demand transparency and accountability from their peers and from government. We will work to ensure that companies understand that the impacts of mining are not gender neutral, and that corruption in mining approvals will impact men and women differently.

Civil society organisations will benefit through greater capacity to hold government and industry to account for decisions about mining approvals, to advocate for people’s rights and to participate effectively in decisions about mining. This will happen when civil society organisations play their critical role as accountability actors to scrutinise the decisions of government and the conduct of industry players. The programme works with other civil society organisations to build all of our abilities and capacities to access and interpret information about the allocation of mining permits, licences and contracts, to monitor the transparency and accountability related processes, and to advocate for reforms to mining sector governance that promote sustainable development.

Mining-affected communities and Indigenous Peoples will benefit through being better able to assert their rights to natural resources and in relation to projects that affect them. Communities will be better equipped to meaningfully participate in decision-making about mining activities and to scrutinise and hold to account the decisions of government and the conduct of industry players at a local level. The programme works with other civil society organisations to build the capacity of mining-affected communities to observe the approvals process, scrutinise outcomes and take up meaningful opportunities to participate in aspects of mining approvals that directly affect them.”

### 2.2 Results model including hypotheses

The results model and the Theory of Change (ToC) including its key assumptions and impact hypotheses were developed during phase I prior to the start of phase II in 2018. This process involved staff of the global team, TI-S, TI-A, and external stakeholders, including MACRA research involving 18 participating chapters of an overall 750 stakeholders and an Expert Reference Group (Phase II proposal, p. 23). The Expert Reference Group included BHPF, ICMM, Anglo American PLC, Newcrest Mining Limited, Commonwealth Secretariat, UN Development Programme, World Economic Forum, NRGI, PWYP, Open Contracting Partnership, Columbia Centre on Sustainable Investment, the Centre for Social Responsibility in Mining, EITI Secretariat, Transparency and Accountability Initiative, OECD, U4, Africa Development Bank, World Bank (Phase II proposal, p. 36).

A visualization of the ToC is provided by the evaluators in figure 1. The ToC is part of a highly complex system. The AMP was implemented in interaction with a complex system of governments policies, processes and political will, corporate policies and behavior and adjusted policy agendas, e.g. international debates, EITI standard on BO, gender and closely with EITI, PWYP, NRGI (see boxes partially outside the system boundary at the right hand side in figure 1).

The assumptions, inputs, activities, outputs, and outcomes have been confirmed by the evaluators as part of the ToC. Results require policy and institutional change of governments and mining companies to prevent corruption, sanction corrupt behavior, and promote good governance, and behavior change of individuals and organisations. In that respect the TI Monitoring Guide ‘Are we on the Road to Impact’ was observed in the design of the programme.
Changes in corruption risks in awarding mining permits, licences and contracts (see, change marker 2) are not fully inside the AMP’s systems boundary, and thus partially outside the sphere of responsibility of the AMP based on the understanding that results from governmental, corporate, donors or other initiatives outside of the AMP system boundary influenced the impacts (as shown by light blue box in figure 1).

Figure 1: Results model, drafted by the evaluators.

To achieve the objective (‘Mining’s contribution to sustainable development is enhanced by increasing transparency, accountability and effective regulation in processes for awarding mining permits, licences and contracts.’), the programme worked mainly on two interrelated intervention levels: global and national. The subnational (local) level was integrated in chapter activities, for instance, in Australia, Chile, Kenya, Sierra Leone, South Africa, Zambia and Zimbabwe (TI, 2019, Phase II Mid-term learning paper, p. 15, 21, furthermore INTSL_1, INTSL_3, INTZM_7, INTZM_8, INTZM_9 and in Australia focus on Queensland and Western Australia e.g. “at every roundtable meeting providing active input” INTAU_2; INTAU_3). Despite these examples of subnational engagement, the finding of the mid-term learning exercise may still reflect the reality that more than ten chapters (the majority) did not engage directly with stakeholders at the subnational level.
due to lack of capacity in terms of staff, financing and local office presence. Partially, chapters sought engagement via intermediaries (TI, 2019, Phase II Mid-term learning paper, p. 18).

The evaluators found that the AMP’s link to sustainable development (see, SDG boxes in figure 1), as indicated by the theory of change and the initial programme name ‘Mining for Sustainable Development (M4SD)’ was realized mainly via the strand of partnerships and cooperation with other initiatives. Governments, corporates, initiatives and organisations such as PWYP, EITI, NRGI, ICMM interacted not with just one or two outputs or outcomes of the AMP, but with the entire system (as shown by light blue box in figure 1). When the AMP engaged in advocacy, via TI’s global network, multistakeholder initiatives such as EITI, government platforms such as IGF or industry platforms such as WEF, it was often aimed at changing the willingness of key decision makers to promote change, which – again – influenced not just single results of the AMP, but the whole complex system at all interconnected levels interventions (global, national, subnational).

The results chain across all stages of the mining value chain to contribute to sustainable development is very long. The design of the AMP and the ToC clearly contributes – indirectly – to SDG 1-11, more narrowly to SDG 16 and 17 and thus fosters the interests of the target groups of stakeholders in the global anti-corruption movement and of stakeholders in 18 countries on national and sub-national level of governments, private sector, civil society and mining-affected communities. Given the time span of a three-year global programme, its high level of ambition to make an impact on sustainable development has been a continuous challenge in the perspective of members of the global team and stakeholders across several chapters.

Quite central to the AMP’s intended contribution to highly aggregated effects at impact level is that the mining industry benefits from the outputs (e.g. multi-stakeholder mechanisms, MACRA, business integrity) and contributes to a level playing field through better corruption control systems. This is of particular relevance in emerging mining jurisdictions or in countries with conditions of weak governance, for instance, in Sub-Saharan Africa.

The AMP provided advocacy and stakeholder outreach at global and chapter level. Inputs consisted of capacity building to 18 TI chapters on project and financial management, technical support for research and advocacy, and opportunities for joint learning.

Typical AMP activities consisted of raising awareness, motivation and capacity to act on corruption risks that have been identified in phase I, advocacy campaigns, including where possible via consensus building and joint advocacy, and forging networks and partnerships with other CSOs and affected communities, host governments and mining companies.

The evaluation focuses on the results of TI’s global and chapter level advocacy based on the programme’s ToC. The criteria selected for the assessment are effectiveness, impact and sustainability.
3. **Evaluability and evaluation process**

3.1 **Evaluability: data availability and quality**

**Data quality**

The data provided by TI and the data generated during evaluation allowed for an evaluation of the project based on sufficient data quality.

Initially, there was no evaluability of the ‘Effectiveness – Dimension 1: Achievement of the intended objectives’ due to lack of target values and measurability of the log frame. In discussion with the global programme team the evaluators took mitigating action to ensure the evaluability by introducing an indicator (below, see effectiveness chapter).

It can be stated that the data quality as well as contribution of the programme to outcome and impact level results is strongest for the areas of the programme’s change markers 3 (‘Change in strength and effectiveness of multi-stakeholder network committed to reducing corruption risks in awarding mining sector permits, licences and contracts’), 4 (The multi-stakeholder network undertakes joint advocacy aimed at reducing corruption risks in awarding mining sector permits, licences and contracts’) and 6 (‘Stakeholders have information about corruption risks in awarding mining permits, licences and contracts’).

The information and data collected to date by the programme was sufficient to provide an indicative overview of the applicability and appropriateness of the SROI methodology, and to trial that methodology in one country.

**Data analysis process**

All data was structured according to the evaluation dimensions and questions, described below. Interview and workshop answers were documented by the evaluators (under the ‘Chatham House Rule’) and stored in a format that allows for cross-referencing between sources and data. Interview data was coded (with “INT” for interview, “WS” for workshop group and “EW” for evaluation workshop) to ensure the anonymity of stakeholders. This process ensured that data sources for the selected evaluation criteria are triangulated. The criteria of effectiveness and impact were assessed based on a combination of analyses of quantitative (dimension 1) and qualitative data (dimension 2 and 3), and sustainability based on qualitative data (dimension 1 – 3). Triangulation of statements and workshop results (data) was done on the same questions from different stakeholder groups and individuals. The two-person evaluation team – and the extension with consideration of the SROI methodology – pursued triangulation through joint data collection, analyses and reflections for all evaluation criteria and dimensions, and sought interim feedback loops from the programme team at TI-A and TI-S.

In overview, the following formats were applied to support triangulation of stakeholder input:

**Interviews (INT)**

38 semi-structured interviews with 46 interviewees were conducted to reflect on the context of the programme and the progress with regards to the criteria of effectiveness, impact and sustainability,
all evaluation dimensions. Questions relate to the selected country case or the global arena, or selected evaluation aspects – depending on role and knowledge of the interviewee. The focus of the interviews varied according to the stakeholder’s area of involvement in the project. The method allowed for privacy and in-depth exploration of certain topics with immediate clarifying questions by the evaluators, if needed. In order to better access the situation and the effects on country level, three country cases were selected for particular attention, and interviewees approached in each case across the target groups of government, private sector, civil society organisations and communities. The cases were selected based on the following:

- Criteria A: source of donor funding
- Criteria B: country’s ranking on the corruption perception index (CPI)
- Criteria C: level of maturity of the country’s mining sector
- Criteria D: level of capacity building (input) received from the global programme team
- Criteria E: chapter’s perceived availability and capacity to engage with the evaluation team and organize interviews with the chapter’s relevant external stakeholders

While criteria A-C were completed by the evaluators, criteria D and E were populated by the programme team as part of the validation of the inception report. Generally, the evaluators suggest the identification of a cross-section of TI chapters, reflecting different levels of mining maturity, regions and most important for the success of this evaluation, availability of the selected country panels to engage with the evaluation process. Evaluators selected the final three country case studies in coordination with the programme team on 12 March 2021 to be Australia, Sierra Leone and Zambia. The evaluators are aware that the selection of these three country cases brought an inherent bias toward identification of palpable results and identifiable AMP contribution. Had the selection of countries for the evaluation been done randomly and identified three random country case studies, the picture could have been different.

**Workshop groups (WS)**

Four regional WS targeting all participating 18 chapters reflected on the context of the programme and the progress with regards to the criteria of effectiveness, impact and sustainability. The workshops applied group discussion, consolidation and validation of individual perspectives from:

- North & South America (Canada, Chile, Argentina, Mexico);
- Africa anglophone (Sierra Leone, Liberia, Zambia, Zimbabwe, Kenya, DRC, Ghana, Madagascar, South Africa);
- Africa francophone (DRC, Madagascar);
- Asia / Pacific (Kyrgyzstan, Indonesia, Cambodia, Mongolia, Australia);

All chapters participated and provided input with the exception of DRC and Liberia.

**Social Return on Investment (SROI)**

To consider what other methodologies could be appropriate to assessing the impact of a programme such as this, the evaluation considered the applicability of the Social Return on Investment (SROI) methodology and tested it by applying it to the work in Australia (Queensland...
and Western Australia), see separate note. It consists of a framework for measuring a broader concept of value, applying financial approximations to the creation of value.

**Evaluation workshop (EW)**

At the end of the evaluation phase, an EW took place in two parts. The draft report was discussed, first, with TI-S and TI-A on 20, 26 and 27 April 2021, second, with all interviewees and resource persons of the evaluation phase on 12 May 2021 (based on an open call extended to them). Results were incorporated into the final version of the report.

References are made in the report with regards to data input from INT and WS (e.g. INTSL_1 interview with stakeholder #1 from Sierra Leone panel; WS_1 statement from participant of regional workshop #1). The list of interviewees and references to stakeholder statements in the evaluation report do not correspond to the number in the list in Annex III. This means the coding of references to stakeholder statements is known to the evaluators only for reasons of anonymity.

In order to illustrate the approach to triangulation of data input, the following table shows the complementarity of instruments:

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<th>INSTRUMENTS</th>
<th>DIMENSIONS OF THE ANALYTICAL FRAMEWORK</th>
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<td></td>
<td>Framework conditions</td>
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<tr>
<td>Document analysis of project files</td>
<td>X</td>
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<tr>
<td>INT</td>
<td>X</td>
</tr>
<tr>
<td>WS</td>
<td>X</td>
</tr>
<tr>
<td>SROI</td>
<td>X</td>
</tr>
<tr>
<td>EW</td>
<td>X</td>
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3.2 Evaluation process

The evaluation was conducted between February and May 2021. Due to restrictions related to Covid-19, all meetings, interviews and workshops were held virtually.

Milestones of the evaluation process

After the approval of the inception report (IR), the evaluators engaged with internal and external stakeholders to generate data input in INT and WS (15–31 March 2021). Based on the draft report (19 April), and the feedback from TI-S and TI-A, preliminary results were shared and discussed with engaged stakeholders in an open evaluation workshop (EW) on 12 May 2021 before finalization of the evaluation report by 15 June 2021.

4. Assessment according to evaluation criteria

The evaluation criteria selected for the assessment are the OECD-DAC criteria effectiveness, impact and sustainability. For each criterion, the evaluators apply analytical dimensions and evaluation questions as outlined below.

4.1 Effectiveness – Is the AMP achieving its objectives?

In this chapter, “effectiveness’ is defined according to the OECD-DAC as the extent to which the intervention achieved, or is expected to achieve, its objectives and its results, including any differential results across groups.

This takes into account the relative importance of the objectives and results compared to other activities of the implementing organisations or compared to other programmes, initiatives or governmental or corporate actions.

The chapter is organized according to four analytical dimensions and focuses on the following eight evaluation questions:

1. To what extent has the programme achieved, or is the programme expected to achieve, the (intended) objectives?
2. To what extent has the intervention contributed to the achievement of objectives?
3. How effectively has the global programme team supported implementing National Chapters in their planning, implementation and advocacy activities?

4. What support did chapters find most useful and why?

5. How effective was the programme’s approach to building the capacity of participating Chapters? Specifically, in the areas of:
   a. research
   b. programme design/ management
   c. fundraising
   d. communications
   e. advocacy

6. How effectively did the programme move from research (phase 1) to advocacy (phase 2)?

7. How effectively did the programme adapt to the impact of COVID-19?

8. To what extent can unintended positive/negative direct results (social, economic, environmental and among vulnerable beneficiary groups) be observed or anticipated?

**Effectiveness dimension 1: Achievement of objective**

The programme is assessed against the following indicator, which was introduced in the inception phase of the evaluation:

14 out of 18 TI Chapters demonstrate how more effective regulation in processes for awarding mining permits, licences and contracts have or are anticipated to contribute to increased transparency and accountability.

Baseline: 0 of 18 Chapters (at 03/2018)

Target: 14 of 18 Chapters (at 02/2021)

Actual value: 15 of 18 chapters (at 02/2021)

Source: NAP, MEL reporting, INT, WS

15 TI chapters are found by the evaluation to have prepared National Action Plans (NAP) for implementation in phase II that address priorities how more effective regulation in processes for awarding mining permits, licenses and contracts contribute to increased transparency and accountability. They are: Australia, Cambodia, Canada, Chile, DRC, Guatemala, Indonesia, Kenya, Mongolia, Liberia, Peru, Sierra Leone, South Africa, Zambia and Zimbabwe.

The indicator reflects the level of ambition on impact level, as it measures the high-level objective based on all six change markers, all NAPs and the corresponding means of verification across chapters. It measures the achievement of the overall programme's objective which reads:

- “Mining’s contribution to sustainable development is enhanced by increasing transparency, accountability and effective regulation in processes for awarding mining permits, licenses and contracts.”
The evaluators asked stakeholders to describe to what extent the programme has achieved, or is expected to achieve, this objective, and to rank achievement on a scale from 1-5 (1= lowest, 5= highest).

The TI chapters in the region of Asia / Pacific (Australia, Cambodia, Indonesia, Kyrgyzstan, Mongolia) ranked the achievement highly (on average: 4), in Africa (Ghana, Kenya, Madagascar, Sierra Leone, South Africa, Zambia, Zimbabwe) rather highly (on average: 3.8) and in North / South America (Argentina, Canada, Chile, Mexico) in the lower medium rage (on average: 2.3).

The achievement was described mostly in terms of the completion of MACRA research, produced reports and evidence-based statements in consultation processes and establishing cooperation and networks and creating awareness of decision-makers about gaps and remedial actions to address transparency and accountability in processes for awarding mining permits, licences and contracts.

For the contribution of mining to sustainable development, all further steps of the mining value chain are relevant. It was pointed out that even bigger corruption risks, “grand corruption”, in the industry, occur after the award process – further down the mining value chain, for instance, during construction or sharing of equity (INTGlobal_9).

In the three country cases selected for a closer look as part of the evaluation, national objectives and the overall level of ambition of achievements are as follows:

Australia pursued four objectives in the NAP, regarding better processes for due diligence and beneficial ownership (objective 1), development of a standardised protocol for disclosure of the mining negotiation process and agreement content (objective 2), development of more effective independent verification of Environmental Impact Statements (objective 3), and stronger anti-corruption, political donations, lobbyist and whistle-blower legislation and frameworks (objective 4). The chapter targeted the subnational jurisdictions of Western Australia and Queensland. It was noted in the chapter’s reporting and during evaluation across stakeholder groups that initially there was a broad lack of political will and push back in the sector against engaging with TI in those topics as stakeholders were not used to Australia’s systems and processes being exposed to this critical assessment and dialogue on corruption risks. Government and industry representatives state other issues such as initial poor research, communication and expertise. The exchange was observed by stakeholders to have improved very much and positioned the programme in the third year as an accepted voice in multi-stakeholder settings with government and industry. Key results relate to awareness raising and advocacy to address the risks identified (INTAUS_7, 10, 11; INTGlobal_9).

Zambia focused on the dialogue between government, companies and communities to build understanding of the need to publish and communicate Environmental Impact Assessment (EIA) processes and reports (objective 1), at awareness in the five affected communities (Mansa, Lufwanyama, Solwezi, Kasempa and Kalumbila) on the mining agreements contents that affect them (objective 2), and at consultation and involvement of community members by local leaders in decision making processes on mining licensing by creating, for instance, district-level Transparency Action Groups (TAGs). The chapter stated that their advocacy made a strong contribution to the revision of the Mines and Minerals Act, where TI Zambia worked with other CSOs on putting forward a reform, including strengthening of Free Prior Informed Consent (FPIC). No input was received for this evaluation from government officials for triangulation of statements. Viewed from close to the target group, impacts are not yet palpable as they are expected to be seen over the
longer term when informed community participation can lead to more constructive debate among stakeholders and change of processes in mining awards (INTZM_7, 8).

Sierra Leone sought to ensure due diligence by the National Minerals Agency (objective 1), to reduce the opportunity for “facilitation payments” by making public information about processing time for each stage of the application process (objective 2), to ensure through collaboration with the Sierra Leone Extractive Industry Transparency Initiative (SLEITI) and the National Minerals Agency (NMA) and the private sector, to regularly publish fees and other charges paid by mining companies during the application process and during operations (objective 3), and to increase the capacity and knowledge of mining community residents through trainings and outreach activities, and to monitor the Environmental and Social Impact Assessment processes (objective 4). The chapter described the contributions of the programme towards the objective in reform of sector governance such as revisions of the Mines and Minerals Act. External stakeholders were aware that the chapter did a series of consultations on draft provisions for the forthcoming revision of the act and that it was part of a CSO alliance that submitted clear and outspoken comments to the government. However, data does not allow for an independent assessment of the strength of the contribution of the AMP to the forthcoming revision of the act and the potential developmental effects of the changed processes. The progress of the programme is acknowledged by third parties to have increased the knowledge base on transparency and civic awareness of “specialist groups like TI”, which can “bring citizens to a point where they can productively engage.” (INTSL_2).

The evaluators found that almost all interviewees across all interviewed groups considered the programme’s objective to be highly ambitious and complex, if not unrealistic to be achieved within the 3-year time frame.

Global stakeholders referred to potential progress towards the objective at country level, where changes could be measured in a more nuanced way. All stakeholders were conscious of the fact that anything involving regulatory and process change takes a long time. A contribution towards objective and meaningful progress was however indicated by many interviewees, in particular in the three selected country cases.

The global team in particular was conscious of the complexity of the programme objective, indicating that it was developed prior to phase II. Some interviewees considered the logic for the achievement of the overall objective not that sound, others found it hard to understand the programme’s ambition, targets without values, what was achieved and why. This item recurs in the analytical dimension ‘quality of implementation’ and the chapter ‘assignment management’.

**Effectiveness – Dimension 2: Contribution to achievement of objectives**

While a number of organisations and institutions work in the space of governance of natural resources and the selected focus of the AMP on the first stage of the mining value chain (amongst others EITI, ICMM, IGF, NRGI, PWYP, WEF,) relevant stakeholders across groups clearly stated that, through the MACRA research and resulting advocacy, TI did effectively establish itself as the thought-leader on corruption at the mining licencing stage, being able to influence the global agenda. The fact that the programme had decided to work on such a niche topic within the larger mining value chain has been overall noted as positive and highly decisive by stakeholders, indicating that this allowed TI to be considered and recognized as experts in this field. Typical statements in support of this finding are that the programme is a “key player” among NRGI and PWYP (INT_1) and
that the global team was “very clear what they are working on” and the AMP being “very good at keeping this focus without getting lost” (INTGlobal_4).

The program’s ability to bring concrete, relevant examples from TI chapters into global debates has received widespread recognition. For instance, this was achieved when the global team managed to connect the beneficial ownership (BO) debate with specific examples of using BO information on due diligence and licensing processes. Furthermore, drawing on examples from TI chapters on gender and mining made the topic much more concrete. The AMP contributed to those topical debates. The programme is perceived as quite dynamic to “ride the wave“ and to have been able to “add to the narrative” and help to explain “why” the topics are important (INTGlobal_7).

The AMP contributed to informing and strengthening the global debate on anti-corruption and mining, notably as one of the main advocates in the EITI arena. According to participating stakeholders specifically regarding beneficial ownership and contract transparency, the programme made a significant contribution to meaningful implementation of the 2019 EITI standard requirement 2.5 on beneficial ownership (detailed out in the EITI guidance note). As of January 2020, it is required that EITI implementing countries request, and companies publicly disclose, beneficial ownership information, and many of the TI chapters are located in EITI implementing countries and members of EITI’s multi-stakeholder groups that can oversee and safeguard implementation. Advocacy was done by chapters and by the global team, e.g. by illustrating to the EITI secretariat and stakeholders what corruption in this space means based on the results of the MACRA tool. The evaluators found that the AMP made a contribution to understanding the nexus of transparency, corruption and gender, where the AMP’s guidance on gender is seen as “superb” to help in-country implementation (INTGlobal_7).

One of the overall strengths of the programme was the ability of the global team to convene different stakeholders around specific topics of discussion in webinars and meetings on a global level and on national level to strengthen the TI chapters to amplify their voice addressing governments and industry (e.g. Australia, Sierra Leone, Zambia), which has been indicated by a number of interviewees.

**Effectiveness– Dimension 3: Quality of implementation**

The global team is assessed by TI chapters as highly effective in supporting their planning, implementation and advocacy activities, with a few exceptions, see table below. Those exceptions show a pattern of wide time-zone stretch and non-English speaking language barrier. The global team addressed this by having team members who are fluent in French and Spanish, and in working flexible hours. The aspect of ownership by chapters was observed and strengthened, for instance, all chapters were found to have taken the lead on communications activities around their own activities, such as events and the promotion of the research outputs, supported by communications experts from the global team and TI-S.

It was noticed in phase I that the project management capacity of chapters had been a critical constraint, and several actions were taken to address this in phase II. The number of staff in the global team was extended, additional staff were hired by chapters, the implementation was thoroughly systemized with chapters, and chapters were advised and supported to recruit and train the right people and improve their project management standards. In Sierra Leone, for instance, the practical support to build capacity in accounting and financial reporting was highly valued and showed direct results in the Chapter’s capacity. Chapters received templates and documents which
were perceived as helpful to support the quality of implementation of their activities. In relation to activities, the focus was on tools and factsheets to support advocacy. However, several chapters felt overwhelmed by the amount of input and the number of emails from the global team. At the same time, supported by the AMP, chapters were advised by TI-S on wider chapter governance aspects such as policies for child protection and against sexual exploitation, abuse and harassment, which helped to reduce the risk for the programme.

The programme’s approach to building the capacity of participating chapters was oriented towards the NAP, MEL reporting and results of chapter activities. There was an elaborate ‘Chapter Capacity Assessment & Plan’ and the AMP team discussed with all the TI-S regional advisers the approach taken to the chapters, but the evaluators did not find assessments of specific contexts or tailored strategies to the different levels and speeds of individual chapters. The AMP team considered it beyond scope and capacity to undertake individual assessments of each participating chapter.

Regarding the support to fundraising there is a mixed picture of chapters taking up support from the global team and trying to identify own funding sources and others relying on the global programme or finding interest from funding organizations without much of their own proactive effort. Information asymmetries have been apparent. Members of the global team stated that it was hard to get specific, up to date information from chapters to the detriment of establishing a basis to play a meaningful role in supporting fundraising from afar.

In the area of research, it was found that chapters that undertook the MACRA research in phase I were well prepared. Chapters that came on board in 2019 had the additional time challenge – given that the MACRA research takes at least 12 months – to produce research results before evidence-based advocacy can start and contributions towards high level impacts can be made. On the other hand, chapters that started late in the programme could use the lessons learned of phase I. Sharing of lessons learned took place via highly valued global and regional workshops organised by the global team with chapters (before COVID) and through advice from the global team to chapters and online formats (before and during COVID). The intention of the global team was – with regards to all chapters – to put them in a position to secure additional funding so they could continue this work during and after the AMP funding ended. For advocacy, across all stakeholder groups and across all countries the AMP was viewed as very supportive with materials and sharing information of what to consider in order to make advocacy more effective.

A lot of effort by the global team and chapters was put into programme design and management and the documentation. The reporting to funding organisations provides detailed account of activities, results and risks. More details, caveats and potential alternatives are described in the chapter on assignment management.

Very early on, the AMP was aware and responsive to the setbacks that arose from the COVID restrictions. Both the COVID AMP continuity plan (in seven updates, including risks assessment, mitigation strategies, adjusted activity planning) and the draft advocacy implementation reflection paper indicates the activities that were affected and what immediate actions should be taken. The global team provided guidance especially to MACRA chapters given they had a more limited window for implementation of advocacy, and on what they could focus on with the time and resources available in the COVID context. A working group at the programme level was set-up with fortnightly meetings to check on status of lockdown in chapter countries and check how both chapter and global activity and financial planning will develop. In some cases, funds were adjusted to recognize delays to implementation, so that no chapter would accumulate high amounts of cash.
Over long periods, activities and trainings were conducted while working from home. Deadlines were extended, budget lines shifted and chapters that were supposed to finish in November 2020 received an extension to March 2021. Funds underspent from travel budgets were reallocated to outputs. The benefits of the use of new, digital technologies were harnessed by the programme well before the COVID crisis, being the obvious choice for a global programme in order to not be limited to physical meetings. From March 2020, the AMP switched entirely to exchange and activities in form of video conferences, e-learning and online tools, knowledge and debate platforms.

The following table brings together the key findings from interactions with TI coordinators from chapters through regional workshops (WS) during the evaluation. This covers the Asia / Pacific workshop (WS_1) with the chapters of Australia, Cambodia, Kyrgyzstan, Indonesia and Mongolia; the North / South America workshop (WS_2) with the chapters of Argentina, Canada, Chile and Mexico and anglophone and francophone Africa workshops (WS_3) with the chapters of Ghana, Kenya, Madagascar, Sierra Leone, South Africa, Zambia and Zimbabwe. The findings were summarized regionally by the evaluators in order to remain non-attributable to individuals. In the workshops and interviews, chapter staff were asked to rate the support of the global team to effectively achieve their NAPs and in building their capacity specifically in the areas of research, programme design/ management, fundraising, communications and advocacy on a scale from 1-5 (1= lowest, 5= highest). The table presents the average rating per question from the workshops and interviews as well as the overall rating for each evaluation criteria together with a number of examples below the table to support the rating.

<table>
<thead>
<tr>
<th>How effective was the support from the global team to build capacities of chapters regarding ...</th>
<th>Asia/ Pacific workshop 25 March 2021 (WS_1) Cambodia, Indonesia, Mongolia, Kyrgyzstan, Australia</th>
<th>North / South America workshop 25 March 2021 (WS_2) Canada, Argentina, Chile, Mexico</th>
<th>Africa workshops 25/26 March 2021 (WS_3) Ghana, Kenya, Madagascar, Sierra Leone, South Africa, Zambia, Zimbabwe</th>
<th>Overall rating</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) Achieving NAPs</td>
<td>4,5</td>
<td>4,3</td>
<td>4,1</td>
<td>4,3</td>
</tr>
<tr>
<td>b) Research</td>
<td>4,6</td>
<td>2,5</td>
<td>4,2</td>
<td>3,8</td>
</tr>
<tr>
<td>c) Programme design and management</td>
<td>4</td>
<td>3,5</td>
<td>4,1</td>
<td>3,9</td>
</tr>
<tr>
<td>d) Fundraising</td>
<td>3,2</td>
<td>1,8</td>
<td>3,6</td>
<td>2,9</td>
</tr>
<tr>
<td>e) Communications</td>
<td>4</td>
<td>2,8</td>
<td>4,6</td>
<td>3,8</td>
</tr>
<tr>
<td>f) Advocacy</td>
<td>3,6</td>
<td>2,3</td>
<td>3,8</td>
<td>3,2</td>
</tr>
</tbody>
</table>

*Scale from 1-5 (1= lowest, 5= highest)*

a) Achieving NAPs

The global team support to achieve the chapters’ NAPs was highly rated with an overall rating of 4,3 points, referring to the global team’s continuous availability, its ability to help with context-specific challenges and hands-on support in developing the NAPs. The global team was perceived as “very effective” and “always available to discuss specific challenges, made suggestions, understood the contextual challenges and needs”, and “always available to offer guidance and very flexible to change approaches when necessary to accommodate changes in the operating environment”. (WS_1) Chapters appreciated the webinars organized by the global team, the exchanges that were organised with global stakeholders (e. g. EITI). The assistance was highly valued in developing the
NAP, annual plans and the best methods for the continuation of activities during COVID (WS_3). It was highlighted that the global team had a variety of expertise and personalities and was able to deliver services “for each area” of AMP (WS_3).

b) Research

In terms of research, the overall rating comes to 3,8 points, quoting the high quality of the MACRA tool and the global team’s capacity building and support efforts for in-country research. The MACRA training, global meetings and materials were found useful (WS_1-3), but not always well timed (WS_2). Integrating gender into the research was much welcomed but considered to be initiated late.

c) Programme design and management

Programme design and management capacity building to chapters was equally rated at 3,9 points overall, with the chapters appreciating the global team’s guidance and support and ability to adjust to the specific country context. The global team was offering training opportunities and guidance in strategy development, “helpful” trainings and materials (WS_2), adjustments of approaches to fit the working context and offering guidance on reporting to meet donor requirements. Practical support to improve accounting and financial reporting “showed direct results” (WS_3).

d) Fundraising

The effectiveness to build chapter capacities in fundraising was ranked a little bit lower at around 2,9 points, which might reflect disappointment in not having been able to effectively raise funds for the continuing of the programme in-country. The effects of COVID were also named as a reason why fundraising and follow-up with potential donors was hindered. During global and regional meetings, there were trainings in fundraising offered, and continuous support provided. One chapter stated due to the AMP it had “learned the basics of fundraising and communication with donors and succeeded to obtain a financing from an international NGO”. The global team was noticed for having encouraged building coalitions, including events to enable fundraising. Chapters mentioned the support of cooperation with the EITI Secretariat, ICMM, IGF, Rio Tinto, Anglo American, Oxfam, PWYP, World Bank, and the ‘Leveraging Transparency to Reduce Corruption’ project (LTRC) of the Brookings Institution, Results for Development (R4D) and NRGI (WS_1-3). Some chapters stated that they had needed “more support” from the global team on fundraising or fundraising were not well timed (WS_1-2), more donor mapping and approaches to solicit grants (WS_3) and sustainability should have been discussed in the network around mid-term review. Despite the global team supporting fundraising and participating in fundraising meetings, some chapters “could not see much progress” (WS_2).

e) Communications

Communication support and capacity building of Chapters was ranked highly with an overall of 3,9 points, citing much appreciation for support in writing of blogs and giving space and support to demonstrating the chapter’s own experiences and examples to a larger international audience. Having regular skype and zoom calls with the global team were useful to share updates, receive clarifications and to create a strong sense of belonging to a global transparency effort (WS_1). The global team was “extremely responsive” (WS_2) and encouraged chapters tell their stories and supported on developing blogs and videos. Factsheets and guidelines as well as new, user-friendly designs, e. g. process maps, received positive feedback. Chapters felt that their experiences were
“valued through different publications and webinars” (WS_3). They had opportunity to share experiences directly with international actors (WS-1-3).

f) Advocacy

Capacity building efforts by the global team in improving advocacy skills were rated at an overall 3.2 points. Advocacy work brought along challenges for all chapters in demonstrating results because of the relatively short time period following the MACRA research, as well as the challenges of coordination in a multi-stakeholder environment. Interacting with the government and the mining industry required all methods and approaches available under the programme: training at the global workshop, support to stakeholder analysis and advice on how to approach different stakeholders with different messages and how to use the multi-stakeholder approach was assessed as “very helpful” (WS_3). The global team was commended for helping to frame recommendations to national governments, which helped to bring messages across to government. (WS_3) In future, a webinar or short training on innovative approaches in advocacy in the mining sector could make a difference for some chapters (WS_1).

In summary, the support of the global team was valued positively by chapters in all dimensions.

Effectiveness– Dimension 4: Contribution to unintended results

Potential risks were identified at the onset of the project phase II (see Risk Assessment) in the BHPF project proposal and subdivided into security risks and project implementation risks which were then given a likelihood rating for each of the funded chapters, an impact score as well as mitigation strategies. It was noted that “given the fluid global environment within which the programme operates, the risk management strategy must involve constant monitoring of the changing operating context in all participating countries. The table represents our current judgments about the risks in the different operating contexts for all chapters involved in Phase II. This will change throughout phase II and the risk assessments will be updated as necessary.” (Phase II Proposal, p. 72). The evaluators found documented efforts of risk monitoring (TI, 2018-2021, Risk Assessment AMP, excel file), in which change of framework conditions and assumptions in 15 aspects were systematically monitored by the global team. This involved feedback from the chapters. The risk descriptions, mitigating actions and responsibility for action have been clearly stated and frequently updated throughout phase II. The programme applied a risk matrix quarterly, and chapters send updated risk assessments six monthly.

Unintended positive or negative results of its activities were not systematically monitored. An option would have been the change marker matrix or the MEL plans (e.g. monitoring changes in the area of unintended results). Most changes that occurred were “what we wanted to see” (INTZM_1). The following unintended negative effects were mentioned by stakeholders during the evaluation:

For countries joining the programme in Phase II and applying the MACRA tool in 2019 for the first time, there was too little time left to enter the advocacy phase and yield results. By design, those countries were not intended to be funded for advocacy phase when they started out, but to complete their MACRA research and use the findings and learnings of the peers in the programme to develop a long-term advocacy strategy (NAP). Reallocation of funds and additional funding from DFAT allowed, in the meantime, to plan funding for a six-month advocacy period to help those chapters to capitalize on the research done and to transition into securing their own funds. However, when in March 2020 restrictions were put in place due to COVID, this hampered
realization of these plans. This caused unmet expectations among some chapters. As shown above, the global team worked closely with the MACRA chapters to support them to work out what was possible under COVID-restrictions, e.g. arranging online meetings, publications.

The programme’s focus on the licensing phase has been interpreted quite broadly by each chapter with some chapters doing work that pushes the boundaries on what the original programme’s objectives are (e.g. Zimbabwe working on ASM, Sierra Leone doing community monitoring work that might be outside of the programme’s scope).

The programme was flexible in adapting and responding to unintended positive results, such as interest and feedback on the global thematic projects. For example, it was noted that the work on the business integrity tool received a lot of attention (INTGlobal_6). The project was able to flexibly respond and “go where the energy is”, e.g. resulting in a joint event with the ICMM, EITI and WEF on business integrity including leveraging high-level speakers such as the CEO of Newmont Corporation.

An aspect that has repeatedly been named by country chapters was the change of name of the programme in accordance with a request by TI’s International Board. This resulted in confusion and a lack of understanding on the link between the previous M4SD programme and the newly renamed Accountable Mining Programme (AMP) on the side of some beneficiaries and partners, as one chapter representative put it: “changing the name of the project set aback the community members, some are not able to link M4SD with AMP”. Many of the chapter staff as well as related stakeholders still referred to the AMP as M4SD, indicating that this change of name has not been sufficiently communicated and explained to stakeholders. The global team pointed out that the rebranding was discussed with the chapters at the global workshop, accompanied with written communications afterwards. For some chapters, the global team accepted that they continue to refer to the programme as M4SD. Evaluators found that this change of name and the effect and trickle down to chapters and community level was not adequately considered.

Monitoring unexpected changes at chapter level through the global team was challenging, with the chapters being so far away, and the additional effect of COVID restrictions in the third year.

**Summarizing assessment and rating of effectiveness**

In total, the evaluators rate the achievement of the (intended) objectives as successful on output and moderately unsuccessful on outcome level, the contribution to achievement of objectives as moderately successful, the quality of implementation as successful (see also chapter on assignment management) and the contribution to unintended results as moderately successful. The effectiveness of the programme is rated ‘moderately successful’.

### 4.2 Impact – What difference does the AMP make?

In this chapter, the OECD-DAC definition of ‘impact’ is applied: The extent to which the intervention has generated or is expected to generate significant positive or negative, intended or unintended, higher-level effects (such as changes in norms or systems).

Impact is assessed with regards to actual or potential transformative effects of the AMP in social, environmental and economic terms that are longer-term or broader in scope than those already
captured under the effectiveness criterion. The evaluation looks at indirect, unintended and potential programme results.

The chapter is organized according to three analytical dimensions and focuses on the following evaluation questions:

1. To what extent can the higher-level changes (anti-corruption and results in social, economic and environmental dimensions and the interactions between them) to which the programme is designed to contribute be identified?
2. To what extent has the programme achieved behaviour and policy and institutional changes (e.g. for organisations, systems and regulations)?
3. To what extent has the programme actually contributed to the identified changes that it was designed to bring about?
4. To what extent has the programme achieved its objectives at the level of the intended beneficiaries?
5. Were there any unexpected or unplanned results?
6. Are there alternative ways that the programme could have quantified the impact?
7. To what extent did the programme serve as a model?

**Impact – Dimension 1: Higher-level (intended) development changes**

The programme identified the intended higher-level development changes on outcome and impact level centering around increased transparency, accountability and effective regulation in processes for awarding mining permits, licences and contracts. At the national level, intended changes at the higher-level are formulated in the NAPs. There is limited international comparability between NAPs leading to obstacles to monitor and aggregate impacts. This has been a known trade-off of working on the priorities relevant to specific country contexts. Impacts at the national level are based on TI chapters and civil society being able to voice their interest during decision-making and to hold government and industry to account. The programme promotes a constructive constellation in which the mining industry contributes to a level playing field through improved measures to prevent and detect corruption. In interactions with thematic, national or global fora (debates on gender in mining, business integrity, BO, EITI requirements, among others) change in corruption risks in awarding mining permits, licences and contracts is anticipated to be achieved. The AMP has viewed as having a “very good understanding” of the risks and the intended changes in the sector (INTGlobal_1, 2, 3, 5-9).

At the global level, the 2019 advocacy strategy and the 2020 draft advocacy implementation plan mark the changes of beneficial ownership in the EITI arena, business integrity and business and human rights in the arenas of UN Global Compact, UN Working Group on Business and Human Rights, OECD Global Forum on Responsible Business Conduct, World Economic Forum events, ICMM, and community engagement and public participation in the arenas of the International Land Coalition, IFC, IGF Forum and Land Portal.

The AMP impact is foreseen to be achieved through the outcomes of improved framework conditions at the starting point of the mining value chain. The programme premise is that adjusted
government policies and processes lead to more transparent and accountable decisions on granting rights to explore and mine in the public interest.

These outcomes contribute to SDG 17 (partnership for the goals), SDG 16 (effective and accountable institutions) and eventually to SDG 1-11 and improvement to the lives of indirect beneficiaries.

**Impact – Dimension 2: Contribution to higher-level (intended) development changes**

The programme contributes plausibly and indirectly to the anticipated higher-level development changes (SDG 1-11, more narrowly to SDG 16 and 17, see SDG boxes in figure 1).

Where chapters have “vertically integrated” global, national and subnational engagement, they have built strong momentum for action (TI, 2019, Phase II Mid-term learning paper, p. 6). This has been the case, for instance, in Australia, Sierra Leone and Zambia.

The AMP interacted, formed partnerships and organized joint activities with the main advocates for change in the industry and with the governments, as well as with NRGI, Oxfam and CSO coalitions of PWYP or the multi-stakeholder initiative EITI. The AMP was able to widen the network of people by bringing “people together” (INT_Global_8)

The global team, BHPF and DFAT management, staff involved from TI-S, TI-A, and chapters have collectively built-up specific TI expertise and being recognized as thought- as well as advocacy leaders in this particular field by all relevant stakeholders. This achievement is a result of the combination of phase I and phase II. The reliance on the quality of AMP work has helped chapters to gain increased acceptance as advocates and a brokers of multi-stakeholder discussions (TI, 2019, Phase II Mid-term learning paper, p. 30).

There is good evidence from documents and stakeholder statements that the AMP has established TI as one of the leading organisations on the topic of corruption in mining, being the only organisation bringing forward research and evidence-based advocacy on the corruption challenges at the licensing stage.

The Responsible Mining Business Integrity Tool is stated by the global programme team to have been based on close to 40 international standards and practices (including GRI, IFC Performance Standards, SASB, UK Bribery Act Guidance, US FPCA Guidance, IRMA, Responsible Mining Index, and the UN Global Compact) and is an intermediate step to higher-level effects, when it is used by companies to evaluate and reduce their corruption risk exposure.

As the beneficial ownership requirement of EITI is about to be broadly implemented, TI chapters play a meaningful role in safeguarding implementation. Sustained efforts by chapters, government, industry and others will be needed to produce lasting impact.

Notwithstanding those contributions, in the key topics like beneficial ownership and business integrity the discussion is at a very early stage in some country contexts. There is some indication that IGF has taken into account some of the AMP’s comments on the ESIA guidance, which would create huge leverage with the implementaton by IGF members (INT_Global_10).

What has changed for the target group of people and communities in mining areas has been described by stakeholders for selected contexts in Australia, Sierra Leone and Zambia as follows:
increased awareness of citizens regarding the corruptions risks at the first stage of the mining value chain in their areas, better understanding on meaningful community consultation and FPIC, collaboration with local journalists or a more confident attitude to engage with mining companies and national and sub-national governments especially on compensations and environmental impacts.

To a certain extent, the AMP can be considered as a model. Regarding the instruments, the MACRA tool is transferable to application in other countries (beyond the group of 18 TI chapters) and contexts (other steps in the mining value chain or other industries). Regarding the human resources, the trained staff of the chapters can lead in their enhanced professionalism and expertise by example. This is not limited to subject expertise of mining regulation in processes but also includes research approaches, evidence-based advocacy, communication and strategic stakeholder engagement.

The global programme team expressed an interest in understanding whether alternative methodologies could be used to assess impact. This interest was partly because of the challenges determining the impact of advocacy programmes in complex systems, and partly to enable the story of the impact that the programme has to be better told. Against this background during evaluation, a Social Return on Investment (SROI) methodology was drafted (see Annex II). However, the challenge remains to assess the extent to which the programme contributed to impact-level changes.

From the perspective of the industry donor, the programme including its phase I starting in 2016 was one of the first in the portfolio of BHPF. The foundation states that the programme helped to understand the landscape, to identify the corruption risks and how to address them in long and sustained efforts. The findings influenced the design and management of further projects. Nowadays, BHPF has commissioned 35 projects. These projects are not only in the area of natural resource governance.

**Impact – Dimension 3: Contribution to higher-level (unintended) changes**

As described in ‘Effectiveness– Dimension 4’, the programme monitored risks that covered framework conditions on higher-aggregated level. The monitoring of higher-level (unintended) changes was not found to be systematically documented, but their emergence was taken into account and mitigated by different in-build means. Crucial feedback loops to identify higher-level unintended changes have been in place. The lead for in-country implementation was not with a contractor, where there are risk of isolation and disconnects to vulnerable groups, but via TI chapters that are intertwined in the anticorruption movement, multi-stakeholder groups, coalitions and in regular touch with communities in the mining areas.

The MEL reporting system was not found to entail monitoring of the occurrence of additional unintended results at impact level. Several stakeholders stated that emerging opportunities for (positive) results were difficult to seize because of the perceived high effort of regular processes and the narrow focus of the programme. The global programme team notes that reporting requirements were imposed by the funding organization.

An unintended negative result was in some cases the initial negative perception of the MACRA research by the local mining industry, resulting in certain industry representatives not showing up for subsequent meetings. This was reportedly due to the perceived critical nature of potential corruption pertaining in the industry and government. The global team was aware that parts of
industry or government will be resistant to the findings of work in relation to corruption and in anticipation of this reaction supported chapters to engage them and build relationships by underlining a non-confrontational approach which helped address this with some stakeholders (particularly in focus countries like Australia). In some EITI countries, mitigating actions were taken by using the existing multi-stakeholder groups. The AMP is widely known to have worked based on high-quality research and products – though different levels of quality between chapters can be found – eventually gaining the trust of mining industry representatives, as a precondition for the use of the products and the results of advocacy on impact level.

What was not assessed or reflected based on research by others: in which chapter contexts mining has had or has the potential to have negative impacts on the SDG and overall sustainable development.

**Summarizing assessment and rating of impact**

In total, the evaluators rate the achievement of the higher-level (intended) changes as moderately unsuccessful, contribution to higher-level (intended) changes based on subjective opinions across stakeholder groups as moderately successful and contribution to higher-level (unintended) changes as moderately successful. The effectiveness of the programme is rated ‘moderately successful’.

### 4.3 Sustainability – Will the AMP benefits last?

In this chapter, ‘sustainability’ is defined in accordance to the OECD-DAC as the extent to which the benefits of the intervention continue or are likely to continue. This includes an examination of the personal and organisational capacities of the TI chapters (and the systems they delivered the results to) needed to sustain benefits over time. It involves analyses of resilience, risks and potential trade-offs and estimating the likelihood of benefits continuing over the medium and long term.

The chapter is organized according to three analytical dimensions and focuses on the following evaluation questions:

1. How have chapters ensured the sustainability of their interventions (project activities, mainly including advocacy work, multi-stakeholder engagement, policy and legislative change) and how could they improve these efforts in future iterations of the programme?
2. How has the global team ensured the sustainability of its interventions and how could sustainability be done better in future iterations of the programme?

**Sustainability – Dimension 1: Capacities of the beneficiaries and stakeholders**

Having established methodological strong tools such as the MACRA tool and the Responsible Mining Business Integrity Tool, the AMP built a strong network of global and national partners, and systematically explored opportunities for advocacy whilst taking the capacities of chapters and partners into account (TI, 2019, Global advocacy strategy; TI, 2020, Draft advocacy implementation plan – reflection).

The 2018 global workshop provided sessions to assess capacity needs together with chapters. Clearly, the 18 chapters differ to a large degree in capacity and ability to absorb AMP impulses. The
AMP followed the strategy to systematize the implementation thoroughly with chapters and ensured that chapters were capacitiated to recruit and train the right people and take the right approach according to project management standards. Several chapters hired dedicated staff with advocacy and management expertise (e.g. Australia, Kenya, Zambia), and sought to diversify funding.

The programme produced an elaborate ‘Chapter Capacity Assessment & Plan’, but no assessment of specific context or a tailored strategy to the different levels and speeds of chapters nor an explicit exit strategy were found. The global team conducted several capacity building trips to chapters that were identified as needing particular support including Indonesia and Sierra Leone. These chapters were identified in the quarterly review meetings held by the global team after each reporting period to discuss each chapters’ gaps, progress and financial position.

The programme management reacted to the situation of a previous “gender-blind” intervention and introduced a gender strategy in January 2020. Subsequently, gender aggregated data was collected in selected activities to promote gender sensitive approaches and a gender evaluation was conducted at the end of the programme. It was assessed that the staff made serious and valid attempt to integrate gender in monitoring activities, however, with many reporting requirements and a large number of chapters in the programme it was not found to be realistic (Glastonbury, 2021, Gender evaluation, p. 19).

A gender coordinator was hired to support chapters with gender integration into NAPs (for the MACRA chapters) and the annual plans, making many chapters re-consider their gender sensitivity and inclusion into their actions. This position had initially not been programmed but many interviewees gave extremely positive feedback on this being one of the unique features of the AMP, indicating how much value they see in the work on gender and corruption (“superb ... Only a few organizations do that.” “Bringing in gender is an innovation, leading best practice in the field.”).

Subject expertise and credibility are critical to get attention from industry and government. Chapters reported different strategies to build technical expertise, e.g. recruitment, contracting of consultants, partnerships with organisations. Each of the strategic approaches to build subject expertise needs different kinds of capacities at the chapters to be managed properly (Phase II mid-term learning paper, p. 28).

From a private sector perspective, the MACRA tool and the Responsible Mining Business Integrity Tool were commended for their thoroughness and their orientation toward practical usability, however, criticized for focusing on too many details, which is stated to make application difficult in companies that have limited human resources, such as junior companies. The question was raised whether an abridged version would better fit to the capacities of junior companies as they are a crucial part of the mining sector (INTGlobal_9).

**Sustainability – Dimension 2: Contribution to supporting sustainable capacities**

As previous analytical efforts have shown (TI, 2019, *Phase II mid-term learning paper*, p. 29), the global team has been providing targeted support around identified capacity gaps. The global team has invested extensively in building the capacity of participating chapters in regard to processes (introducing specific work processes), documentation and reporting (specifically in regard to MEL reporting and NAPs), advocacy and strategy building, communication and financial reporting. This
was done through bilateral direct support to chapters, capacity building sessions at the global programme workshops and a number of in-country missions. The efforts were undertaken in close consultation with TI’s Regional Advisors for the respective chapters and sought coordination with other GTNI’s to ensure that the AMP’s activities add value to the overall work of the participating chapters. All of the capacity building efforts were highly appreciated by interviewed chapters and demonstrated direct positive outcomes, especially in relation to financial reporting.

On a thematic level, interventions were integrated into national EITI processes in some countries, ongoing and opportune law reform and policy discussions and the global team actively encouraged and supported chapters (e. g. with additional funding, nominations as representatives of the programme for presentations) to contribute in global fora and conferences, giving them the opportunity to present and demonstrate their specific expertise. For instance, in November 2020, IGF and AMP brought on board TI chapter representatives from Kenya and Zambia when co-hosting an online forum on Goxi, which examined the effect of COVID on environmental and social impact assessment processes and related community engagement. Further examples extend to the role of the programme’s experts as reviewers of, for instance, the World Bank’s integrity due diligence training modules for the extractive sector, the FAQ on corruption due diligence prepared by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, IGF’s ESIA Guidance for Governments, Brookings/R4D ‘The TAP-Plus Approach to Anti-Corruption in the Natural Resource Value Chain’ or the NRGI report ‘Beneath the Surface: The Case for Oversight of Extractive Industry Suppliers’. This has effectively established experts of the programme and chapters as recognized experts in the field of corruption and mining, potentially creating opportunities for them to participate in national and international debates even beyond the end of the programme.

Attempts were made to improve sustainability in regard to building the capacity of chapters on their own local fundraising, effectively making them financially more independent from global donors.

Those efforts did not lead to each and every chapter being onboard from the beginning to the end. A very small number of chapters and stakeholders were not convinced by the overall approach, the partnership between TI and BHPF, stating CSO credibility issues (WS_2 and observed by INTGlobal_5).

**Sustainability – Dimension 3: Durability of results over time**

At the global and national level, according to documents and interviews and reports, the programme has brought many chapters to a higher competence level and fostered their attitudes to interact with key players at EITI, PWYP, NRGI and others. Many chapters improved regional and global cooperation, e. g. in expanding relationships to industry and government and among the CSO movement, establishing even new relationships with Brookings, IGF or to large companies operating in countries where chapters did not have contacts before. This is founded in the widely accepted results of the MACRA research (notwithstanding initial resistance to the MACRA research as stated above).

Given a hypothetical, if asked in the year 2025 ‘What do you note will have remained from the 2018-21 Programme?’, a majority of TI chapters expects the value of the MACRA tool will prevail. This includes the ability to monitor changes against a baseline over years, however, no specific
future activity plans could be identified yet. The action plans do not reach that far, but several peers from chapters expressed their understanding of this being an option after programme’s end. The tool is seen by external global stakeholders as a “phenomenal piece of work” (INTGlobal_5), and some hold the opinion that it will receive a genuine demand in the years to come from mining companies being interested in applying this tool. In the view of a key global stakeholders, the AMP’s “case studies and examples and tools are a legacy” (INTGlobal_3).

At the country level, where chapters (e.g. Australia, Sierra Leone, Zambia) have built competence and reputations as leaders in broader civil society movements, there are funding opportunities to continue and expand the work that was supported by the AMP. Other chapters are in a different situation, some apparently due to staff fluctuations, are at the stage where they require basic training in subject expertise and management skills. Several interviewees expressed concern about the aftermath when the AMP is finished. There is widespread awareness among interviewees that a situation needs to be avoided in which chapters and local networks might fall back to the original status before phase II.

The programme has funded sustained efforts and the global team has broadly build expertise of chapters that can be used by TI in-country staff and stakeholders (e.g. community leaders) in the years to come. Skills have been developed (evidence-based advocacy) that are transferable by TI chapters to other industries (e.g. oil and gas, agribusiness, forestry).

Finally, the evaluators judge prospects of sustainability of established rules and regulations as relatively good, in particular when those are embedded in international policy agendas, e.g. requirements for EITI implementing countries, e.g. Ghana, Sierra Leone, Zambia.

**Summarizing assessment and rating of sustainability**

In total, the evaluators rate the achievement regarding the capacities of the beneficiaries and stakeholders and the contribution to supporting sustainable capacities as successful, and the durability of results over time as moderately successful. The sustainability of the programme is rated ‘moderately successful’.
5. Assessment of assignment management

In this section, the quality of the framework of the assignments with BHPF and selected management and efficiency aspects of the implementation is assessed. It analyses approaches and activities compared to possible alternatives with a focus on output maximization.

The TI Secretariat (TI-S) is the contracting partner with the BHP Foundation, and has sub-contracted TI Australia (TI-A) for the management of the AMP including the hosting of the global team. The global team has managed the research (e.g. MACRA tool) and advocacy, procurement and human resources of the global team members (e.g. recruitment, service contracts), financial (e.g. payments to chapters, contracting, due diligence and financial reporting) and MEL (e.g. design, theory of change, monitoring system), whereas TI-S has flexibly supported and safeguarded the implementation.

TI-A’s widely acknowledged expertise in mining, its leadership role in the mining Global Thematic Network Initiative (GTNI) of TI, and the global relevance of Australian mining companies and governmental interest made it a reasonable choice for the location of the global team. However, this location was disadvantageous to efficiency due to the geographical (and time-zone) distance between the global team in Australia, secretariat in Germany and the majority of chapters and stakeholders in Africa, and further chapters in North and South America and Asia/Pacific. It was due to the extraordinary commitment of staff involved to agree on times for online meetings or to avoid disruptions of workflows and thus work before or after hours that this stretch could be mitigated to the extent possible.

The AMP has been implemented in a complex arena characterized by dynamic and multi-faceted impulses from a multi-stakeholder landscape. Maneuvering a programme in this environment requires implementation strategies that incorporate an in-depth understanding of the context, continuous monitoring and solid risk mitigation and evidence-based adaption of instruments and strategies. The global programme management and several chapters had a strong, effective focus to produce outputs to signal relevance and progress. The AMP produced videos on selected aspects of awarding mining permits, visualization of processes in form of maps, reports and briefing papers including. Chapters have authored a number of blogs on different topics during the course of the programme, including a blog series covering four countries (Australia, Mongolia, Indonesia, Sierra Leone) and a blog series on effective community engagement covering countries like Cambodia, South Africa, Zambia and Zimbabwe.

The global team, BHPF and DFAT management, staff involved from TI-S, TI-A, and chapters have collectively built-up specific TI expertise during phase I and phase II. The reliance on the quality of the AMP work has helped chapters to gain increased acceptance as advocates and a brokers of multi-stakeholder discussions (TI, 2019, Phase II mid-term learning paper, p. 30).

A key success of the programme was that its global team achieved a high reputation and much appreciation from almost all participating chapters for its availability, cooperative and service-oriented approach as well its competence and subject and methodological expertise. It promoted interaction of chapters and global partners and has harmonized processes within the TI global network.
The AMP was credited by the interviewees with supporting the improvement of relationships between the involved organizations in an outstanding manner both within the global TI network and externally on global and national levels.

The defined programme objective, the results framework of the BHPF and DFAT assignments and the requirements of the Monitoring, Evaluation & Learning (MEL) approach provided guidance to the programme but were found by staff of several chapters to have limited practical applicability. The MEL framework was designed and introduced in 2018 and reporting took place in two consecutive years. The MEL framework entailed Change Markers to target policy development and reporting frameworks which enabled a better understanding of status and progress. MEL was perceived as very comprehensive; however, chapters reported that it took too much dedicated time and resources with unclear benefits, and for some chapters it turned out to be too much to cope with. Thus, the MEL was useful for some chapters with appropriate capacities and who were operating in the context of policy, institutional, or behavioral change where sufficient substance was generated for semi-annual reporting. All chapters did the MEL reporting and quarterly activity and financial reporting for BHPF – most of them guided in detailed process advice by the global team. The MEL data generated by countries as well as the NAPs did not lead to international comparability, and obstacles to monitor and aggregate impacts remained.

The programme management reacted to the situation of a previous “gender-blind” intervention and introduced a gender strategy in January 2020. Subsequently, gender aggregated data was collected in selected activities to promote gender sensitive approaches and a gender evaluation was conducted at the end of the programme.

Towards the end of the programme, the question emerged in discussions as to whether a Social Return on Investment (SROI) methodology could be used to assess the impact of the AMP. During the evaluation it was found that a SROI methodology tool could be applied and that the current data and information collected by the AMP and the TI-A does provide an insight. However, data and information are incomplete to enable a full SROI analysis, and knowledge interests and processes would have needed to be ingrained to the MEL at an earlier stage. The potential approach for future programmes can be found in Annex II.

The evaluation found that in principle, the high-level programme objective was agreed with the chapters, however not very familiar to most. Upon a request of the TI International Board the management rebranded the programme from M4SD to AMP in 2020 as discussed above. This rebranding was probably done at a too advanced point in time in the programme life cycle. An adaptation of the Theory of Change as well as targeted change management actions were expected by several staff members and chapters – from hindsight at the time of evaluation. Still, the programme objective was kept as it was defined at the beginning in 2018 and is assessed across all groups of staff and stakeholders as overly ambitious. The programme produced two annual MEL (Changer Marker) reports based on chapter surveys and collected monitoring data. Change marker 2 on change of corruption risk was never used for reporting. Several chapters did not follow-through with MEL reporting, and it was not continued throughout the programme. The programme management states that there was no requirement to conduct a third annual MEL (Changer Marker) report and the chapters should not be overburdened given that the gender evaluation and the final evaluation were forthcoming.

According to several stakeholders, the logic and professionalism they came in contact with via the results framework and the MEL approach was appreciated even though they report to not have had
the ability, focus or time to invest in all aspects of sustained, collective reporting. Instead of qualitative reporting of high-level changes those chapters appear to have preferred doing the monitoring in terms of more incremental steps of change and of the direct use of outputs.

Summarizing, the AMP management has successfully managed the assignment, built a strategy already in phase I (research) that allowed achieving the indented results of phase II (advocacy). In the perspective of chapters, the global team was very service-oriented to provide explanation and support. Furthermore, it achieved a high reputation in the realm of almost all participating chapters for its cooperative and service-oriented approach. It promoted interaction of the global team with chapters and of chapters and global partners and has harmonized processes within the TI global network. The global team was attributed by the interviewees during evaluation to have supported the improvement of stakeholders’ relationships in an outstanding manner both in the TI internal arena (TI chapter network) and externally (government, private sector, CSO and further partners), as well as on global and national levels. The AMP operated within the strategies of BHPF and DFAT.
6. Conclusion and overall rating

This section provides the overall rating and the conclusion including a brief discussion of the questions:

- Why is the project evaluated as more or less successful?
- Which particular strengths and weaknesses become apparent in the overall view of the selected criteria?

The conclusion based on the selected OECD-DAC criteria shows that the programme achieved positive ratings for effectiveness, impact and sustainability. There is a mixed picture for impact where higher-level changes are largely still anticipated given the ambition of the programme and the limited time for delivery that was even impacted by COVID restrictions since March 2020. The evaluators rate the programme ‘moderately successful’.

This is supported by the following summary of strengths and weaknesses of the AMP:

**Strength**

- Identifying and keeping the focus on one area (‘awarding mining permits, licenses and contracts’) of evidence-based advocacy in the mining value chain based on strong, innovative and widely accepted research (MACRA tool). The tools and reports that were quality-assured by the global team have been perceived as high-quality research and being well communicated resulting in considerable appreciation among relevant stakeholders on national and global level.
- Ability to leverage activities and collaborate with industry as a critical, but solution-oriented trusted and competent stakeholder.
- Using the decentralized global programme architecture to elicit interest and contributions from a diverse set of chapter contexts (emerging and mature mining jurisdictions, least developed and highly developed countries as well as the full range of weak and good governance levels). The aspect of ownership by chapters was observed and strengthened, and the lead for in-country implementation via TI chapters that are intertwined in the anticorruption movement, multi-stakeholder groups, coalitions ensured regular touch with communities and vulnerable groups in the mining areas.
- The global team achieved a high reputation and much appreciation from almost all participating chapters for its availability, cooperative and service-oriented approach as well its competence and subject and methodological expertise. It promoted interaction of chapters and global partners and has harmonized processes within the TI global network. It created opportunities for staff in the chapters to generate and share specifics learnings within and outside the TI network. It had the ability to leverage and partner with other initiatives and programmes effectively and bring to the forefront credible examples using first-hand chapter expertise, e.g. to thematic, national or global fora such as EITI, IGF and WEF (debates on gender in mining, business integrity, BO, EITI requirements, among others).
Skills have been developed (e.g. project management, financial reporting, evidence-based advocacy) in several countries that are transferable by TI chapters to potential interventions in other industries (e.g. oil and gas, agribusiness, forestry).

The programme management reacted to the situation of a previous “gender-blind” intervention and introduced a gender strategy in January 2020. A gender coordinator was hired to support chapters with gender integration into NAPs and action plans, making many chapters re-consider their gender sensitivity and inclusion into their actions.

High level of proficiency for online outreach activities as well as online communication and engagement with chapters and the global TI network (even before COVID changes in March 2020).

Early awareness and flexible responsiveness to the setbacks that arose from the COVID restrictions. Both the COVID AMP continuity plan (in seven updates, including risks assessment, mitigation strategies, adjusted activity planning) and the draft advocacy implementation reflection paper indicates the activities that were affected and what immediate actions should be taken. The global team provided guidance especially to MACRA chapters on what they could focus on with the time and resources available in the COVID context.

**Weakness**

- Limited international comparability between NAPs leading to obstacles to monitor and aggregate impacts. This has been a known trade-off of working on the priorities relevant to specific country contexts.

- Limited applicability of results framework and monitoring approach resulted in limited uptake by chapters (e.g. not following through with MEL reports). According to several stakeholders they appreciated the professionalism of the MEL framework, but stated limited time, resources and process capacities to invest in the aspects of collective reporting, i.e. qualitative reporting about sector changes and programme contributions.

- Imbalance of the time and effort between a) MACRA research and b) advocacy in the perception of several global and TI stakeholders.

- Geographical (and time-zone) stretch between global team in Australia, secretariat in Germany and the majority of chapters and stakeholders in Africa as well as chapters in North and South America was disadvantageous to the connectivity to some chapters and had to be mitigated with extraordinary commitment of staff involved.

Double-edged partnership: The partnership as such of the ‘CSO’ (TI) with the ‘industry’ (BHP Foundation) received much visibility and approval and has been widely perceived as a strength. However, a small number of interviewees identified this funding partnership as a weakness and potential risk to the credibility of the AMP, saying that it should not be continued (WS_2; Global_1). The latter view was expressed and observed on the one hand by CSOs and community level groups (in geographical contexts of constrained relations between community and mining projects), and on the other hand by industry stakeholders who claim as a general rule not to fund advocacy of any CSO.

In the next table the rating of the selected OECD/DAC criteria is presented in overview:
<table>
<thead>
<tr>
<th>Evaluation criteria</th>
<th>Dimension</th>
<th>Rating</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Effectiveness</strong></td>
<td>Achievement of the (intended) objectives</td>
<td>moderately successful</td>
</tr>
<tr>
<td></td>
<td>Contribution to achievement of objectives</td>
<td></td>
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<tr>
<td></td>
<td>Quality of implementation</td>
<td></td>
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<tr>
<td></td>
<td>Contribution to unintended results</td>
<td></td>
</tr>
<tr>
<td><strong>Impact</strong></td>
<td>Higher-level (intended) development changes</td>
<td>moderately successful</td>
</tr>
<tr>
<td></td>
<td>Contribution to higher-level (intended) changes</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Contribution to higher-level (unintended) changes</td>
<td></td>
</tr>
<tr>
<td><strong>Sustainability</strong></td>
<td>Capacities of the beneficiaries and stakeholders</td>
<td>moderately successful</td>
</tr>
<tr>
<td></td>
<td>Contribution to supporting sustainable capacities</td>
<td></td>
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<tr>
<td></td>
<td>Durability of results over time</td>
<td></td>
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<tr>
<td><strong>Overall rating</strong></td>
<td></td>
<td>moderately successful</td>
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</tbody>
</table>
7. Recommendations

The recommendations are made in view of the BHPF funding for the programme coming to an end in June 2021 (under the BHPF contract, implementation activities have ended in April 2021), effectively reducing capacities and opportunities enormously. It is against this background that the evaluators issue the following recommendations to the members of the TI global network:

1) Continue to make knowledge and products available permanently.
   a) External Stakeholders:
      ▪ TI to continue to share tools, reports and results to national and global stakeholders on knowledge platforms, e.g. on goxi.org or flagship products like the MACRA research on ResearchGate.
      ▪ Until June 2021, TI-S and TI-A support TI chapters to share ideas emanating from the last years of the AMP implementation for future research or advocacy on knowledge platform or other professional platforms including social media on programme highlights (bite-sized chunks, if possible quantified outputs or impacts) or short blogs that might attract attention of funding organisations, other CSOs to cooperate with or academia and think tanks.
      ▪ Share learnings, e.g. TI peers from the global network share single observations in short blogs that are beneficial for TI’s standing with funding organisations or other CSOs.
   b) Internal stakeholders:
      ▪ The AMP business integrity tool, internal programming and work process documents (such as sustainability guidance and checklist or communications guidelines) made available for other TI programmes.
      ▪ Share and use the forthcoming handbook of project management based on the experience of running the AMP (as foreseen in the year 3 annual plan) for future network projects.

2) Chapters continue advocacy. Adapt NAP objectives and activities to ensure continuity, e.g. with regards to community engagement in mining areas. Seek continuation via ongoing TI activities, for instance to thematically integrate into existing TI environmental, natural resource governance, business integrity or human rights programmes, or pursue further options like continuing to provide light-touch support to community networks as part of corporate / community engagement or EITI processes.

3) Continue engagement with the mining industry in order to refine tools, in particular for business integrity, and to increase the uptake of ready-to-use tools by companies with limited human capacities and resources, like junior companies.

4) Continue leveraging TI chapter expertise through the GTNI or an extended community of practice with a view to influence thematic, national and global fora of different organisations (industry events, investment conferences, research conferences of governments and
multilateral institutions, AAMEG, EITI, IGF, NRGI, PWYP, WEF etc.). TI-A in its GTNI role and TI-S use inhouse resources (at a minimum: one assigned person dedicating 10-20 percent of staff time) as a ‘one-stop shop’ doing TI network-wide annual and quarterly planning for upcoming conferences and events where TI country expertise and credible examples shall be positioned. The 2021 draft ‘Advocacy implementation plan – reflection’ offers a systematic approach and sound leads.

5) Safeguard the acquired competencies and expertise at TI-S, TI-A and selected TI chapters to develop mining sector proposals and ensure GTNI readiness for collaboration with chapters when opportunities arise to leverage in-country funding opportunities of bilateral and multilateral programmes.

6) For future proposals consider the value of the draft Social Return on Investment (SROI) methodology (see Annex II) for results measurement. However, it needs careful design and preparation as the potential proxies as well as monetary and non-financial values need to fit to the specific Theory of Change. In suitable contexts which allow to establish clear system boundaries of the TI intervention and involvement of key corporate, governmental and civil society stakeholders, this has the potential to strengthen TI’s monitoring and evaluation system.

7) Consider building on the current version of the MACRA tool and apply its evidence-based ‘corruption lens’ to:
   a) Other stages of the mining value chain or to systemic weaknesses of the mining value chain from a country’s mining potential – ranging from the ‘first stage risks’ in mining permit award processes to the ‘last stage risks’ to actually reach sustainable development (e.g. risks in mining-related fiscal and spending processes).
   b) Industries beyond mining (e.g. oil and gas, agribusiness, forestry).

8) Pursue ongoing discussion of AMP’s thematic streams to engage in energy transition topics such as renewable energy infrastructure deals or deals regarding coal and further resources that are stranded in the low carbon transition (see ‘stranded assets’ debate).

9) TI chapters to monitor progress and impact against the initial MACRA baseline after 5 years. TI-S, TI-A and GTNI to consider supporting chapters to implement a lighter MACRA version, e.g. with a maximum of 3 months research phase.
Annexes

Annex I: Evaluation matrix

<table>
<thead>
<tr>
<th>Evaluation questions</th>
<th>Analytical aspects</th>
<th>Data source, quality and collection</th>
<th>Analytical dimension</th>
</tr>
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<tbody>
<tr>
<td><strong>Effectiveness</strong></td>
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<tr>
<td><strong>Dimension 1</strong></td>
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</table>
| 1. To what extent has the programme achieved, or is the programme expected to achieve, the (intended) objectives? | 1. SMART programme indicators achieved.  
2. Indicators reflect programme objective.  
| 2. To what extent has the intervention contributed to the achievement of objectives? | 1. Assessment based on the activities and outputs  
2. What would have happened without the project? | Source: NAP, MEL, phase II mid-term learning paper, global team members, TI-S staff, TI chapter staff, in country stakeholders, global stakeholders. Quality: medium. Collection: document analysis, INT, WS and triangulation of sources, data and evaluators. | Effectiveness – Dimension 2 |
| **Dimension 2**      |                   |                                    |                     |
| **Dimension 3**      |                   |                                    |                     |
| 3. How effectively has the Global Programme Team supported implementing National Chapters in their planning, implementation and advocacy activities? | 1. SMART indicators NAP.  
2. Documents of planning and implementation meet TI quality standards.  
3. TI interviewees can make statements that indicate that TI quality standards were observed. | Source: MEL, phase II mid-term learning paper, global team members, TI-S staff, TI chapter staff. Quality: Strong. Collection: document analysis, INT, WS and triangulation of sources, data and evaluators. | Effectiveness – Dimension 3 |
| 4. What support did Chapters find most useful and why? | 1. Support since 02/2018 can be described.  
<table>
<thead>
<tr>
<th>5. How effective was the Programme’s approach to building the capacity of participating Chapters? Specifically, in the areas of: a) research b) programme design/management c) fundraising d) communications e) advocacy</th>
<th>1. Capacity Development (CD) approach defined. 2. CD strategies of Chapters defined. 3. Contribution can be described.</th>
<th>Source: MEL, phase II mid-term learning paper, draft paper advocacy implementation reflection, global team members, TI-S staff, TI chapter staff. Quality: Strong. Collection: document analysis, INT, WS and triangulation of sources, data and evaluators.</th>
<th>Effectiveness – Dimension 3</th>
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<tr>
<td>6. How effectively did the Programme move from research (phase 1) to advocacy (phase 2)?</td>
<td>1. Change from phase 1 to phase 2 can be described. 2. Documents and interviews confirm consideration of recommendations of phase 1.</td>
<td>Source: draft paper advocacy implementation reflection, global team members, TI-S staff, TI chapter staff, in country stakeholders, global stakeholders. Quality: Good. Collection: document analysis, INT, WS and triangulation of sources, data and evaluators.</td>
<td>Effectiveness – Dimension 3</td>
</tr>
<tr>
<td>7. How effectively did the Programme adapt to the impact of COVID-19?</td>
<td>1. Changes of situation concerning a) assignment management, b) partners can be described. 2. Effects on reaching the objectives can be measured.</td>
<td>Source: draft paper advocacy implementation reflection, global team members, TI-S staff, TI chapter staff, in country stakeholders, global stakeholders. Quality: Good. Collection: document analysis, INT, WS and triangulation of sources, data and evaluators.</td>
<td>Effectiveness – Dimension 3</td>
</tr>
<tr>
<td>8. To what extent can unintended positive/negative direct results (social, economic, environmental and among vulnerable beneficiary groups) be observed or anticipated?</td>
<td>1. Observations on output and outcome level. 2. Consideration of risks mentioned in the design and subsequent monitoring.</td>
<td>Source: BHPF and DFAT contracts, NAP, MEL, global team members, TI-S staff, TI chapter staff, in country stakeholders, global stakeholders. Quality: Middle. Collection: document analysis, INT, WS and triangulation of sources, data and evaluators.</td>
<td>Effectiveness – Dimension 4</td>
</tr>
<tr>
<td>Impact</td>
<td>Evaluation questions</td>
<td>Analytical aspects</td>
<td>Data source, quality and collection</td>
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<td>--------</td>
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<td>-----------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>1.</td>
<td>To what extent can the higher-level changes (anti-corruption and results in social,</td>
<td>Overall programme objective, connection to the NAPs and MEL reporting, connection</td>
<td>Source: BHPF and DFAT contracts, NAP, MEL, global team members, TI-S staff, TI chapter staff, in</td>
</tr>
<tr>
<td></td>
<td>economic and environmental dimensions and the interactions between them) to which the</td>
<td>to SDGs national/global level.</td>
<td>country stakeholders, global stakeholders.</td>
</tr>
<tr>
<td></td>
<td>programme is designed to contribute be identified?</td>
<td></td>
<td>Quality: Good. Collection: document analysis, INT, WS and triangulation of sources, data and evaluators.</td>
</tr>
<tr>
<td>2.</td>
<td>To what extent has the programme achieved behaviour and policy and institutional</td>
<td>Contribution to objectives on impact-level can be described. (Effects can be found in</td>
<td>Source: MEL, draft paper advocacy implementation reflection, phase II mid-term learning paper,</td>
</tr>
<tr>
<td></td>
<td>changes (e.g. for organisations, systems and regulations)?</td>
<td>monitoring data. Effects can be described by interviewees.)</td>
<td>global team members, TI-S staff, TI chapter staff, in country stakeholders, global stakeholders.</td>
</tr>
<tr>
<td>3.</td>
<td>To what extent has the programme actually contributed to the identified changes that</td>
<td>Contribution to objectives on impact-level can be described. (Effects can be found in</td>
<td>Source: MEL, draft paper advocacy implementation reflection, phase II mid-term learning paper,</td>
</tr>
<tr>
<td></td>
<td>it was designed to bring about?</td>
<td>monitoring data. Effects can be described by interviewees.)</td>
<td>global team members, TI-S staff, TI chapter staff, in country stakeholders, global stakeholders.</td>
</tr>
<tr>
<td>4.</td>
<td>To what extent has the programme achieved its objectives at the level of the intended</td>
<td>Contribution to objectives on impact-level can be described. (Effects can be found in</td>
<td>Source: MEL, draft paper advocacy implementation reflection, phase II mid-term learning paper,</td>
</tr>
<tr>
<td></td>
<td>beneficiaries?</td>
<td>monitoring data. Effects can be described by interviewees.)</td>
<td>global team members, TI-S staff, TI chapter staff, in country stakeholders, global stakeholders.</td>
</tr>
<tr>
<td>5. Were there any unexpected or unplanned results?</td>
<td>Unintended changes can be described.</td>
<td>Source: BHPF and DFAT contracts, NAP, MEL, draft paper advocacy implementation reflection, phase II mid-term learning paper, global team members, TI-S staff, TI chapter staff, in-country stakeholders, global stakeholders. Quality: Middle. Collection: document analysis, INT, WS and triangulation of sources, data and evaluators</td>
<td>Impact – Dimension 3</td>
</tr>
<tr>
<td>---</td>
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</tr>
<tr>
<td>6. Are there alternative ways that the programme could have quantified the impact?</td>
<td>Alternative monitoring designs can be identified. SROI approach has an additional explanatory value.</td>
<td>Source: BHPF and DFAT contracts, NAP, MEL, SROI tested in AUS, phase II mid-term learning paper, global team members, TI-S staff, TI chapter staff Quality: Middle. Collection: document analysis, INT, WS and triangulation of sources, data and evaluators</td>
<td>Impact – Dimension 2</td>
</tr>
<tr>
<td>7. To what extent did the programme serve as a model?</td>
<td>1. The process of scaling-up based on anchoring changes in organisations and cooperation systems to generate broad impact can be described by interviewees. 2. Stakeholders of the lead chapter TIA can describe the effect on the capacity as GTNI lead.</td>
<td>Source: MEL, draft paper advocacy implementation reflection, phase II mid-term learning paper, gender evaluation, global team members, TI-S staff, TI chapter staff, in-country stakeholders, global stakeholders. Quality: Middle. Collection: document analysis, INT, WS and triangulation of sources, data and evaluators</td>
<td>Impact – Dimension 2</td>
</tr>
<tr>
<td>Evaluation questions</td>
<td>Analytical aspects</td>
<td>Data source, quality and collection</td>
<td>Analytical dimension</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------</td>
<td>---------------------------------------------</td>
</tr>
<tr>
<td>1. How have Chapters ensured the sustainability of their interventions (project activities, mainly including advocacy work, multi-stakeholder engagement, policy and legislative change) and how could they improve these efforts in future iterations of the Programme?</td>
<td>1. The programme, including the Chapters, has an exit strategy.</td>
<td>Source: MEL, phase II mid-term learning paper, draft paper advocacy implementation reflection, global team members, TI-S staff, TI chapter staff. Quality: Good. Collection: document analysis, INT, WS and triangulation of sources, data and evaluators.</td>
<td>Sustainability – Dimension 1-3</td>
</tr>
<tr>
<td></td>
<td>2. Capacities and ownership of Chapters and partners are observed by exit strategy, and reacted upon.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>3. Lessons learned collected and shared among stakeholders.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. How has the Global Team ensured the sustainability of its interventions and how could sustainability be done better in future iterations of the Programme?</td>
<td>1. The programme has an exit strategy.</td>
<td>Source: MEL, phase II mid-term learning paper, draft paper advocacy implementation reflection, global team members, TI-S staff, TI chapter staff. Quality: Good. Collection: document analysis, INT, WS and triangulation of sources, data and evaluators.</td>
<td>Sustainability – Dimension 1-3</td>
</tr>
<tr>
<td></td>
<td>2. Capacities and ownership of Chapters and partners are observed by exit strategy, and reacted upon.</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>3. Lessons learned collected and shared among stakeholders.</td>
<td></td>
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</tbody>
</table>
Annex II: Social Return on Investment (SROI) Methodology Note

by Helen Russell

This Annex considers the use of the Social Return on Investment (SROI) methodology for the Transparency International (TI) Accountable Mining Programme (AMP) activities. The methodology is based on an equation that calculates the SROI ratio based on dividing the present value of the activities by the value of the inputs. A ‘tool’ is created in Excel to enable this calculation to occur.

This methodology is designed to capture inputs which enable a calculation of the AMP’s value for money by understanding and calculating the social values which were created by the Project, as expressed by the feedback and evaluation forms from TI events, and also some limited views of key partners and stakeholders of TI-A AMP.

There are a number of challenges with the application of this methodology, including the need to apply financial values to social outcomes, which may be varied and conflicting for the stakeholders involved. However, in the view of the evaluation team, this methodology could be applicable to the Accountable Mining Programme.

Introduction

The possibility of applying the SROI methodology to the Accountable Mining Programme was discussed during preparation for an Evaluation of TI’s AMP (03/2018 - 06/2021). TI was interested to understand whether the methodology could be applicable to the Programme. Accordingly, the Terms of Reference for the final evaluation included consideration of the SROI methodology and the possibility of piloting it as part of the final evaluation. The Independent Evaluation team proposed that an external independent researcher be recruited to undertake the research. In order to maximise efficiencies and combat any potential stakeholder fatigue, the evaluation team suggested that the SROI researcher participate in the evaluation stakeholder engagement process to gather information for the methodology.

The methodology and summary of stakeholder engagement is summarized within the evaluation report. To inform the SROI research process, the researcher engaged with 45 individuals and undertook the following steps:

| Document review | TI shared the Accountable Mining Programme’s Change Marker reports and templates, social media data, AMP country reports, MACRA workshop information, Regional Workshop information and Global Workshop information as well as Change Marker presentations for Australia, in an online document room. |
| Stakeholder interviews | Participation in 7 interviews with personnel and partners involved in the Accountable Mining Programme Australia, participation in 15 interviews with Global stakeholders. |
| Regional workshops | Engagement with 18 TI Chapters in regional workshops on 25 and 26 March 2021 |
Investigations into the application of SROI from 16 organisations that advocate or undertake this type of SROI review.

Investigations into contextual dynamics and outcomes of AMP work from 46 independent, credible web sites.

Feedback workshop Took place on 23rd April 2021.

Purpose

This Annex aims to respond to the following queries:

- Is SROI an approach that could be used in TI Accountable Mining Programme and what are the potential limits of this approach?
- What data would be needed to develop an SROI approach for a specific theme?
- What data would be needed to develop an SROI approach for a specific country?
- What data would be needed to develop an SROI approach for a specific corruption risk?

It was agreed that the evaluation team would endeavour to apply the SROI tool to a pilot case study to test the rudimentary methodology. It was determined that the AMP in Australia would be a useful case study to pilot the SROI tool. While work was done to pilot the methodology, it was unable to be completed in the time available.

Background: What is Social Return on Investment (SROI)

There is increasing recognition of the need to understand and account for social, environmental and economic value that results from activities. There is also an increasing desire to understand not only the social impact of activities, but also what sort of difference and how much of a difference the activity is making. Understanding and managing the broader value is becoming increasingly important and helps parties to understand whether their interventions are creating social value.

SROI is a framework for measuring and accounting for a much broader concept of value; it seeks to reduce inequality and environmental degradation and improve well-being by incorporating environmental, social and economic outcomes and uses monetary values to represent them. This enables a ratio to be calculated. For example, a ratio of 3:1 indicates that an investment of €1, delivers €3 in value. SROI is about value rather than money and it is a story about change that includes case studies, qualitative, quantitative and financial information.

The SROI approach was pioneered by Roberts Enterprise Development Fund (REDF) and the concept was developed and supported by the New Economics Foundation (NEF), who launched its first guide in 2007 after piloting it for policy making in the UK since 2002, through the ‘Measuring What Matters’ programme. The NEF worked with over 20 organisations to develop the guidance and test its application in the UK. In 2005, the international SROI Network agreed a framework for use of SROI and the NEF published a revised SROI guide in 2008.

The SROI ratio is always presented to display the Social Value first which is followed by the amount invested. For example, a ratio of 3:1 indicates that an investment of £1 delivers £3 of social value. The Table below provides some comparative analysis on other programmes of work which have
undergone a SROI analysis, to ascertain whether the SROI analysis for the AMP is comparative to other sectors and activities.

The NEF SROI publication tested and applied the approach on the following programmes of work:

<table>
<thead>
<tr>
<th>Project</th>
<th>Purpose</th>
<th>SROI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Merseyside Getting Out to Work Initiative, UK</td>
<td>Third sector organisation management tool to track projections, improve performance, inform expenditure and highlight added-value through the competitive tendering process. Assessed the social value created through the one-on-one intensive training programme for ex-offenders</td>
<td>£10.50: £1 of social value</td>
</tr>
<tr>
<td>MillRace IT, UK</td>
<td>Essex-based firm that recycles computers and trains people recovering from mental ill health.</td>
<td>£7.40: £1 of social value</td>
</tr>
<tr>
<td>Talensi Farmer-Managed Natural Regeneration (FMNR) Project, Ghana</td>
<td>Australian Aid funded collaboration with Talensi farmers and World Vision supporting 1472 households in nine communities to reverse soil deterioration and restore multi-purpose indigenous trees to farmland and community managed forests.</td>
<td>£6: £1 by end of project</td>
</tr>
</tbody>
</table>

The evolution of the SROI framework and practice, has led to improvements in the SROI approach and guidance advocated by NEF, and it has led to some learning in application. Social Value UK makes a Social Value Self-Assessment tool available on line for free.

There are two ways to calculate the Social Return on Investment. The SROI can be 1) evaluative – which is conducted retrospectively and based on outcomes that have already taken place; or 2) forecast - which predicts how much social value will be created by the activities if they meet their intended outcomes.

**Application of the SROI Methodology in general**

Social Return on Investment is a tool for proving and improving social performance and practice. SROI also enables a comparison of the financial value of the social change created with the financial cost of producing these changes. The SROI ratio produced through the analysis is a simple indicator of the value that an organisation creates, for its stakeholders.

The scope of an SROI analysis should establish the boundary of what is being considered. This is often the result of negotiations around what is feasible to measure and the purpose of conducting the analysis. The purpose also relates to the end-user or intended audience.

The following should be considered in order to establish a scope for the SROI analysis:

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2 [Social Value Self Assessment Tool - Social Value UK](#)
Purpose – why do you want to begin this process or analysis? Why now? Are there specific motivations driving the work such as strategic planning or funding requirements?

Audience – who is this SROI analysis for? And include an initial assessment of how the results will be communicated with different audiences.

Background – consider the aims and objectives of the intervention and how it is trying to make a difference.

Resources – what resources including staff time and resources will be required and are these available?

Who will implement? – can you undertake the SROI analysis internally? Do you have the right mix of skills in finance, accounting, evaluation and stakeholder engagement?

The process of evaluating the SROI engages with stakeholders, which helps identify what social value means to them. This also enables an understanding of how value is created from a set of activities and interventions and indicates whether and how change has taken place. The SROI tool helps to find appropriate financial approximations (proxies) for indicators which do not lend themselves to monetisation (for example, increased trust in the mining approvals process). Putting a value on the outcome of the intervention, includes identifying the inputs required for implementation. Valuing an outcome also requires an understanding of the value of the intervention to the specific stakeholder groups involved.

Determining the financial approximations is informed by the costs and staff time involved in the implementation of the activity. As an example, when reviewing the objective: Increased transparency through use of the MACRA tool, the following approximations were estimated and applied:

- mining companies’ communication costs in relation to corruption risks;
- management time in managing corruption risks;
- cost saving in avoidance of legal challenges; and
- communication costs in relation to internal and external dissemination.

The Excel spreadsheet calculating the SROI ratio (see below) includes detailed notes on how each of these financial approximations have been calculated.

There are challenges in undertaking an SROI analysis which require consideration and potentially discussion among the relevant parties. These are:

- Determining which stakeholders should be included and ensuring their relevance to the intervention;
- Requirement to adjust the scope in response to new information;
- Stakeholders that have experienced material outcomes are not a cohesive group and therefore there may be competing demands and/or understanding relating to the same intervention; and
- Focus of activities which may have led to both positive outcomes, as well as negative or unintended outcomes.
Is SROI an approach that could be used in TI’s AMP?

- The response to the question posed by the ToR "Is SROI an approach that could be used in TI’s Accountable Mining Programme and what are the potential limits of this approach?" in brief, the response is: Yes - the SROI approach could be used to measure the performance of the AMP in order to measure the Social Return of Investment in the AMP. This is because the AMP team collect significant amounts of information, including both quantitative and qualitative data which in large part, informs the SROI analysis.

- The SROI process detailed below is intended to evaluate programme impact and seeks to understand the social value of the AMP activities that have been undertaken during the three-year period from 03/2018 - 06/2021. Typically, an SROI should provide the basis for a framework to capture outcomes and it is preferable to start using an SROI to forecast the social value, rather than applying it retrospectively. This is due to the need to establish the correct data collection frameworks from the start to fully inform an analysis later on.

What is the value of undertaking an SROI review for the AMP?³

An SROI analysis can fulfill a range of purposes. It can be used as a tool for strategic planning and improving practice, for communicating impact and attracting investment, or for making investment decisions. It can also help to determine priorities and targets for project expenditure.

SROI can also help an organization to improve activities, results, outcomes and impacts by:

- Facilitating strategic discussions and helping participants to understand and maximise the social value that an activity can create;
- Helping to target appropriate resources at managing unanticipated outcomes, both positive and negative⁴;
- Demonstrating the importance of working with other organisations and actors that have a role in contributing to the desired change;
- Identifying common ground between what an organization wants to achieve and what its stakeholders want to achieve, helping to maximise the social value; and
- Creating a formal dialogue with stakeholders which enables them to hold the service to account and involve them meaningfully in project design.

For the AMP in particular, there are benefits to applying an SROI review. The SROI analysis can measure change in ways which are relevant to the people who experience it. SROI tells the story of how change is created by measuring the social, environmental and economic outcomes and uses a monetary value to represent them. A SROI review is about value rather than money.

The benefits of an SROI analysis are that this type of review can facilitate strategic discussions and help maximise the social value that an intervention or activity creates. The SROI analysis also

³ Text for the section on the Value of undertaking the SROI review has been taken from the NEF Guide to Social Return on Investment and adapted for the TI-A AMP purposes

⁴ If the SROI is forecast, ie, forward-looking, the SROI hypothesizes potential impacts and therefore is better equipped to respond if these results have been anticipated. If the SROI is evaluative, then it can identify any unanticipated outcomes of the activity and review whether the programme put in place appropriate mitigation/management/outreach efforts.
demonstrates the benefits of working in partnership with other organisations and partners that are working towards the same objectives, as well as help to define their contributions to creating the desired change. These benefits are especially significant when undertaking joint advocacy activities with partners, who engage with a different group of stakeholders. For example, the EITI who engages largely with key Government representatives from countries with natural resource wealth, and which provides a trusted entry point for discussion with these parties, appreciates the wealth of research knowledge and expertise that TI-A AMP provides. In addition, there is significant value for EITI to have the opportunity to bring information and data relating to the grass-root level impacts of mining, into their discussions and decision-making.

The discussion around the social return can also help partners to identify common ground with the AMP in order to maximise social value through their own achievements. In addition, the SROI review and the required engagement through dialogue enables the AMP to share ideas, develop pragmatic responses based on core competencies, as well as hold their partners to account. It supports the meaningful involvement of partners in the delivery of project targets.

SROI analysis is an effective advocacy tool which can show government the social return on their investment, to encourage them to invest in policy initiatives such as corruption prevention.

The SROI can also support the AMP’s efforts to become more sustainable by providing evidence to make the case for further funding, as well as improve fundraising proposals and raise the profile of the AMP achievements. This is of particular significance if the results inform future planning processes, as well as help to sustain the interest of stakeholders and participants in the AMP. In addition, an SROI review is useful to donors and funders (including corporate) because it speaks to them in a more specific and quantifiable way.

An SROI tool structured along the AMP’s priority policy objectives and related implementing activities, would provide an understanding of the SROI of the AMP going forward.

**What are the potential limits of this approach?**

The application of the tool to a programme such as the AMP is challenging. The AMP is a complex multi-country programme with multiple stakeholders, a variety of actors and a range of areas of focus. As such, it is challenging to apply a SROI framework across the entire AMP.

Due to the range of programme activities and the variety of inputs, time and data required to assess the SROI, the evaluators determined that a narrow focus would be most appropriate in order to test the application of the SROI tool. Whilst the SROI tool provides a basis for understanding the SROI for a specific programme of work, the tool can be adapted to accommodate and respond to the stated Programme objectives and the specific activities required to deliver these objectives. This draft SROI tool will require adaptation to correspond with the identified programme objectives and activities for each application within TI. However, once the SROI tool has been established for a programme of work, it should only require regular updates in line with TI’s strategic priorities and existing reporting commitments and only minor adaptation in response to specific programme needs and activities in response to changing context dynamics.

**Potential challenges**

The main challenge to application of the SROI methodology lies in ensuring solid and detailed data collection. There may be challenges for the TI AMP to gather all of the information required to inform an SROI analysis due to the following:
the advocacy and outreach programmes may affect several different stakeholders and various areas of work and therefore sourcing feedback on how TI AMP tools have been applied (in particular to source inputs from those without electronic tools), and undertaking the analysis will require a significant investment of staff time;

- Carrying out an SROI analysis requires a mix of skills including stakeholder engagement, outcomes measurement and evaluation and basic accounting skills;

- Time requirement is contingent on many factors including accessibility and availability of information and data. It can also take time to introduce new information and outcome measurement systems.

- Identifying and valuing inputs may also be a challenge. For example, there may be non-monetised inputs identified such as volunteer time or contributions of goods and services and therefore the full cost of delivery should be included within the SROI analysis. The monetization of inputs such as volunteer time should be transparent, such as the equivalent of an hourly wage for the type of work that they are doing.

- Clarifying outputs may also be a challenge when contributions are based on time of participants in the programme, although these should be evaluated the same way as the inputs.

- Describing outcomes, e.g. increased trust in the mining approvals process, to ensure that these capture changes and are not confused with outputs e.g. number of participants in awareness-raising event on mining approvals permitting process. This judgement should be stakeholder-informed but not stakeholder-led. Developing outcome indicators therefore may also present a challenge and in particular should balance objective and subjective indicators.

- Distance travelled (such as increased in numbers of government representatives that participate in TI-AMP events) may be a way of providing an update on the theory of change but provide observable changes which demonstrate progress on the longer-term objective.

What data would be needed to further develop an SROI approach?

It is recommended that the application of the SROI is always mapped against the Programme’s or project’s target objectives, then the data and information to partially demonstrate the SROI is readily available. This is explored further in the section below. The additional data required to inform a full SROI analysis includes the following:

<table>
<thead>
<tr>
<th>Data collected</th>
<th>Gaps in data</th>
<th>How gap can be addressed</th>
<th>What this would enable TIA-AMP to demonstrate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Conference participant numbers and qualitative feedback forms.</td>
<td>How the learning from the event will be applied in the role and activities of the participant going forward.</td>
<td>All event feedback forms should include an additional query asking participants about how the information that they have been provided</td>
<td>Indication of numbers who may undertake behaviour change as a result of AMP guidance through dissemination</td>
</tr>
<tr>
<td>Data collected</td>
<td>Gaps in data</td>
<td>How gap can be addressed</td>
<td>What this would enable TIA- AMP to demonstrate</td>
</tr>
<tr>
<td>----------------</td>
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<td>-----------------------------------------------</td>
</tr>
<tr>
<td>Role of participants</td>
<td>Feedback forms to include role and responsibilities of event participant.</td>
<td>Provide an indication of leverage.</td>
<td></td>
</tr>
<tr>
<td>Outreach of participants</td>
<td>Feedback forms to include a query relating to the projected numbers of potentially affected parties by the identified change in practice and/or policy identified by the participant.</td>
<td>Provide an indication of potentially affected parties from the outreach.</td>
<td></td>
</tr>
<tr>
<td>Direct contact and outreach</td>
<td>How information and guidance shared will affect activities going forward.</td>
<td>Regular direct monthly engagement with target stakeholders to provide guidance and support on activities and receive an update on progress of achievements/ commitments made.</td>
<td>Provide an opportunity to maintain and build relationships with stakeholders. Provide an opportunity to hear progress on commitments and/or activities.</td>
</tr>
<tr>
<td>Participation in events with key partners</td>
<td>Linkage between policy change and activities within Mining communities</td>
<td>Send monthly correspondence to request any follow-up and outputs from events to update TI when relevant actions e.g. community participation in a Mining company ESIA process public consultation activities (this could be a simple multichoice questionnaire). This should be undertaken with partners who are willing and available to co-operate with TI.</td>
<td>On-going application and implementation of TI guidance.</td>
</tr>
</tbody>
</table>

**What data would be needed to develop an SROI approach for a specific country, for a specific theme, for a specific corruption risk?**

The data collected to inform the SROI needs to be based on the specific country, theme or risk targets and objectives.
The AMP undertakes significant research and stakeholder engagement to inform quality outputs and trusted research. This research also identifies targeted interventions and informs the basis of the planning of programme or project activities. The trust and confidence that external stakeholders have in the AMP research is significant. This confidence is due to the credible, robust and consultative processes that the AMP undertakes and which actively seeks inputs and contributions from all relevant stakeholders. In addition, TI-A AMP has successfully created a "safe space" where participants feel that they can express themselves freely, as well as engage in meaningful dialogue in order to collaboratively explore ideas. This "safe space" and the resulting collaborative efforts to identify solutions, has provided the participants with clear direction, clarity over their roles, and responsibilities, as well as corresponding actions in order to collaboratively tackle challenges. This robust and consultative approach to research and its corresponding credibility as a source of expertise is the Unique Selling Point (USP) of TI-A AMP.

Traditional SROI applications include some areas which were not included within the scope for this review, nor within documents made available. These traditional areas include the following: staff retention; brand differentiation; operational efficiencies; risk mitigation; and market capitalisation. It should be noted that the majority of these inputs would not provide further clarity on the SROI of the AMP, however, they would provide a more detailed understanding on project expenditure and related efficiencies.

Developing outcome indicators should measure the change that has taken place and therefore outcomes should have one or two indicators applied to understand whether the change has happened, and by how much. Stakeholders are the best informants into this process. For example, the indicators which may be developed to understand Increased Accountability in the Mining Applications Process would require asking participants or relevant actors if they have increased trust in Mining approvals process. More than one indicator may be required. These may include subjective (or self-reported) indicators, as well as objective indicators. To measure whether there is enhanced trust in the mining approvals process, this would require outreach with parties involved in the mining approvals process, as well as statistical data relating to a range of relevant issues which may include the duration of the approvals process, number of protests in response to mining approvals, staff time in managing the approvals process or costs of producing reports for the approvals process.

The most commonly used data collection techniques to inform the outcomes data include: one to one interviews; record keeping (such as project activity and/ or consultation files); focus groups; workshops and seminars; and questionnaires. There is a need to decide how big the sample size should be. If an intervention involves 20 people, then it would be possible to engage with all of them directly. If the intervention affected thousands of people, then an appropriate representative sample size and statistical tests to support the proposition should be taken forward. The priority is that a sample size selection is defensible and therefore is often based on what is possible within the available budget.

Data and information which would inform the SROI of the target intervention; *Increased Accountability in the Mining Applications Process* in the following areas should be collected.

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### Specific theme *Increased Accountability in the Mining Applications Process*

<table>
<thead>
<tr>
<th>Stakeholder</th>
<th>Outcome</th>
<th>Indicator</th>
<th>What would this demonstrate in relation to the SROI</th>
</tr>
</thead>
<tbody>
<tr>
<td>Junior Mining Companies</td>
<td>Increased understanding of mining approvals process requirements through application of the MACRA tool</td>
<td>No of participants in events to explain mining approvals process</td>
<td>No of Junior mining companies who have increased understanding and awareness of requirements</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Publication of mining license agreements</td>
<td>Effective lobbying to secure access to agreements details</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Downloads of TI Mining Approvals/MACRA guidance</td>
<td>Effective guidance to support development of relevant documents</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Expedited approvals process</td>
<td>Time savings in mining approvals due to a lack of concerns in relation to transparency</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Mining companies communicate corruption risks collectively</td>
<td>Industry recognition of the issue and a collective desire to tackle it.</td>
</tr>
<tr>
<td>Understanding of EIS Statements</td>
<td>No of Junior mining companies that produce informed, relevant and consultative EIS documentation</td>
<td>Effective guidance to support EIS process requirements</td>
<td>Clearer environmental statements are submitted to the relevant authorities leading to a reduction in queries/issues in relation to the EIS statement</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Expedited mining approvals process due to lack of queries in relation to the EIS</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Effective advocacy to encourage uptake of guidance in relation to EIS process requirements</td>
</tr>
</tbody>
</table>

**Example: Specific Country – Australia**

<table>
<thead>
<tr>
<th>Outcome category</th>
<th>Inputs</th>
<th>Outcomes</th>
<th>What would this demonstrate in relation to the SROI</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Staff time</td>
<td>No of investigations leading to convictions</td>
<td>Potential opportunity costs of non-compliance with standards</td>
</tr>
<tr>
<td>Outcome category</td>
<td>Inputs</td>
<td>Outcomes</td>
<td>What would this demonstrate in relation to the SROI</td>
</tr>
<tr>
<td>------------------</td>
<td>--------</td>
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<td>--------------------------------------------------</td>
</tr>
</tbody>
</table>
| Increased trust in the mining approvals process | Costs of print and production  
Cost of online dissemination | and corresponding fines |  |
|                  | Cost of engagement including hosting meetings, travel and subsistence | No of Event Participants  
No of downloads of MACRA tool | Uptake and awareness of the MACRA tool |
| Technical expertise to develop EIS | Expedited approvals process due to appropriate environmental documentation being submitted. |  | Effective lobbying and awareness-raising of TI-A activities |

Example: Specific Corruption risk – **Business Integrity Risks**

<table>
<thead>
<tr>
<th>Outcome category</th>
<th>Outcomes</th>
<th>Data to be collected</th>
<th>What this demonstrates in relation to the SROI</th>
</tr>
</thead>
</table>
| Increased clarity over Business Integrity Risks | Policy and state capture factsheet | Downloads of the factsheet | Levels of interest in managing risks  
Parliamentarians have increased understanding of the need for a National Integrity Commission | Raised awareness of risks and therefore more effective oversight |
|                  |          |                      | Joint advocacy outreach with relevant interested partners | Collective will and demand for clarity over business integrity |

The table above provide a summary of the requirements to inform the calculation of the SROI.
**Recommendations for developing an SROI**

The data and information required and which has been shared by the AMP is sufficient to undertake an Evaluative SROI analysis.

**Principles**

It is important to note that an SROI analysis is a framework based on principles and therefore the AMP should be clear about principles and any inputs into value judgements which are made.

The following principles should be adopted when undertaking an SROI review:

- **Involve stakeholders** – To inform what gets measured and how this is measured and valued;

- **Understand what changes** – Understand the outcomes of activities that have been created and evaluate this through recognizing positive and negative changes as well as those which were intended and/or unintended. The changes are the outcomes of the activities made possible by the contributions of stakeholders and requires the theory of how these changes are created to be stated and supported by evidence;

- **Value the things that matter** – value is created for or by stakeholders as a result of the change including those changes that were intended and/or unintended, as well as changes which were positive or negative. These changes should be evaluated through the use of financial approximations (proxies) in order for the value to be recognized. Applying financial valuation is a way of presenting relative importance to a stakeholder relative to other outcomes. Value is subjective and market forces determines the price (or value) of goods and services.

- However, financial proxies are used to estimate the value of non-traded goods and services. Monetisation of some areas is a straightforward exercise where it relates to a cost saving. For example, reduced waste for a mining company will lead directly to cost savings in relation to amount being sent to landfill (and corresponding charges). However there are proxies that are more challenging to establish. For example, the value of a transparent mining approvals process in relation to the EIS process was calculated using opportunity costs and independent analysis of the number of mining companies in Australia, that have experienced fines or permitting delays, due to irregularities identified within their Mining approvals process.

- **Include what is material** – Determine what information and evidence should be included within the accounts to give a true and fair reflection of impact.

- **Do not over-claim** – Claim only the value that the organization is responsible for creating. This helps to assess the change caused by the activity and to identify trends and benchmarks which would have happened either with or without the intervention.

- **Be transparent** – Demonstrate the basis on which the analysis may be considered accurate and honest and show that it will be reported to and discussed with stakeholders.

- **Verify the result** – An SROI analysis provides the opportunity for a more complete understanding of value being created by an activity, however, it involves subjectivity and so should include independent assurance.

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6 NEF, Taken from The Guide to Social Return on Investment (2015) The SROI Network Accounting for Value
### Approach to developing an SROI

For both the Evaluative and the Forecast SROI review and as part of the programme planning process, AMP team members should seek to develop a SROI – Impact Map. There are four stages in the process of developing an Impact Map.

This impact map would enable TI to understand the following at each stage of the Impact Map and in relation to their interventions:

<table>
<thead>
<tr>
<th>Stage 1</th>
<th>Stage 2</th>
<th>Stage 3</th>
<th>Stage 4</th>
<th>Stage 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>The stakeholders</td>
<td>The inputs (description and value); Outputs; Outcomes (description of change);</td>
<td>Outcomes (what changes) Indicators, source of information, change created, duration, financial approximations (proxies), value of the change, source of data and information</td>
<td>Assess deadweight, displacement, attribution, drop off rates and impact</td>
<td>Calculating the Social Return Applying the discount rate for each year of activity if relevant</td>
</tr>
</tbody>
</table>

The application of an SROI tool for a specific country (as part of a global programme), a global programme (consisting of a number and range of partners), or a specific topic/theme or corruption risk are quite different, and each are dependent on a range of variables. These variables include the stated programme priorities, the resources available, and the capacity of staff and partners to tackle the identified topic. However, the programme priorities inform the planning of programme activities and interventions. The target and/or supportive stakeholders will also be dependent on those who have been identified as part of the strategic planning process as priorities to collaborate with and/or target to meet and/or deliver the stated programme objectives.

The range of interventions and activities which the AMP undertakes results in different levels of investment of time, activities and inputs required in order to understand the SROI of an intervention. However, the data gathering, and stakeholder feedback that is currently collected by the AMP provides a good basis for understanding the impact and SROI of AMP interventions.

Potential stakeholders, intended/unintended changes, inputs, outputs and outcomes should be considered and discussed internally during the project planning process. These areas should be
developed with detailed indicators as well as corresponding financial values applied, or where financial values cannot be applied, financial approximations (proxies) need to be developed to understand the value. For example, to calculate the SROI relating to the publication of the Mining Approvals process map, the following financial proxies were used in the calculation: costs of time relating to TI-AMP staff involved in events; cost of hosting consultation and publication events; cost of designing and printing Mining Approvals Process Map literature; cost of judicial and official involvement in investigations into mining permit irregularities; cost saving of expedited approval process due to submission of relevant and complete EIS documents.

There may be instances where engagement with external stakeholders should be undertaken in order to understand value and therefore apply the approximations appropriately.

**Development of a SROI Tool**

The SROI tool can be developed through the use of an excel spreadsheet with calculation equations integrated throughout the entire workbook. This would ensure that any changes made on one sheet would automatically update the relevant cells and equations in the corresponding worksheets.

The collection of inputs into the SROI review should be formatted in accordance with the impact mapping process outlined in the subsequent impact analysis tables. These impact tables could be applied to a specific country, a specific corruption risk, a specific theme, specific activity or a specific programme of work. When information and data to fill these tables has been compiled, then the SROI can be calculated. The data and information to be sourced at each stage of the SROI calculation process is presented in the Tables below.

### Table 1

<table>
<thead>
<tr>
<th>Stage 1</th>
<th>Stage 2</th>
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</thead>
<tbody>
<tr>
<td>AMP activity – For example: Developing stakeholder interest in a National Integrity Commission</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Stakeholders</th>
<th>Intended/Unintended changes</th>
<th>Inputs</th>
<th>Outputs</th>
<th>Outcomes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Who do we have an effect on? Who has an effect on us?</td>
<td>What do you think will change for them?</td>
<td>What do they invest?</td>
<td>How much is this investment worth?</td>
<td>Summary of activity in numbers</td>
</tr>
</tbody>
</table>

### Table 2

<table>
<thead>
<tr>
<th>Stage 1 (duplicate)</th>
<th>Stage 2 (duplicate)</th>
<th>Stage 3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stakeholders</td>
<td>Outcomes</td>
<td>Outcomes – what changes?</td>
</tr>
<tr>
<td>Groups identified</td>
<td>Changes identified</td>
<td>Indicators</td>
</tr>
</tbody>
</table>
The process outlined in Stages 1, 2 and 3 provide the basis for calculating the SROI. Stage 4 measures and calculates the impact of the programme interventions, and this enables a calculation of the SROI (Stage 5).

Stage 4 requires a review of the inputs to understand the following:

**Stated or Revealed Preference** – How much Project Affected Parties value things relative to other things?

The review then requires a process of applying discounting factors. These discounting factors include the following:

- **Deadweight** – What would have happened without the AMP activity or intervention?
- **Displacement** – Do AMP activities negatively affect other outputs or programmes?
- **Attribution** – what activities would have happened without the involvement or participation of AMP?
- **Drop-off** – how long will the participants remain involved in activities in the future?
- **Duration** – how long will activities endure in the future?

When these discounting factors have been applied, the SROI can be calculated through use of the following equation.

\[
\text{SROI ratio} = \frac{\text{Present Value}}{\text{Value of inputs}}
\]
<table>
<thead>
<tr>
<th>Stakeholders</th>
<th>Outcomes</th>
<th>Impact</th>
<th>Discount rate (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Groups identified</td>
<td>Change description</td>
<td>Deadweight %</td>
<td>Year 1 (after programme activity)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Attribution %</td>
<td>Year 2</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Drop off %</td>
<td>Year 3</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Impact Quantity x financial proxy, less deadweight, displacement and attribution</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Present value</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Total Present Value</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Net Present Value</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Social return € per €</td>
</tr>
</tbody>
</table>
This approach and process to calculating the SROI of any TI programme must be consistently followed to be meaningful. If required, this analysis can then form the basis of a comparative review across multiple programmes of work. It is essential that all Excel spreadsheet SROI tools develop a consistent structure and framework for review. However, the inputs into the Excel spreadsheet should be based on specific country or programme objectives, targets and activities in order to meaningfully demonstrate the SROI. The multi-stakeholder and representative inputs that informed programme planning for the AMP as well as on-going stakeholder engagement will facilitate an understanding of the anticipated benefits or change, deadweight, attribution, and drop-off for the stakeholders involved.

Securing feedback on how policy and advocacy actions will affect the work of the target beneficiaries going forward will also contribute to the understanding of the SROI. Establishing indicators based on stakeholder inputs and project targets, as well as priority country-specific needs would ensure that if an SROI Tool is developed at a country level, policy intervention or programme activity level, this would meaningfully demonstrate the SROI of their area of work.
Recommendations

In conclusion, an Evaluative SROI can be developed and used to demonstrate the value of the AMP 2018-2021.

In order to action this, it is recommended that:

- That future programme activities undertake a Forecast SROI and consider the potential SROI of their programme activities during their planning and related stakeholder engagement processes.
- The approach should align the required data and information gathering processes to inform the SROI with the existing, regular TI data collection, stakeholder inputs and reporting requirements.
- Stages 1-5 of any future SROI calculation should be developed in an Excel spreadsheet.

In addition, the following recommendations have been identified:

- During programme planning, undertake an internal discussion of the potential approximations of value (proxies) as well as monetary and non-financial values that can be applied to TI outcomes. This may require the involvement of some external stakeholders. However, this would establish the correct monitoring frameworks to be able to regularly update the SROI, including the sourcing of relevant and applicable stakeholder inputs, as part of the regular programme monitoring.
- In all stakeholder feedback processes and/or evaluation forms after TI-A events, include a query on how tools, information and/or interventions will amend the stakeholder behaviour and how many potentially affected parties there may be from the specific identified behaviour change.
- Establish a simple Excel spreadsheet for each AMP Country project, which gathers all of the quantitative and qualitative data collected, to be able to review the stakeholder and qualitative inputs over time and monitor any corresponding changes.
- Consider investment in a Self-Assessment SROI tool at reasonable costs and with a range of packages to provide support.\(^7\)

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\(^7\) Social Value Self Assessment Tool - Social Value UK
Annex III: List of interviewees

Please note: The list of interviewees and references to stakeholder statements in the evaluation report do not correspond to the number in this list below. This means that the referenced statement (e.g. INTGlobal_1) in the report has not necessarily been made from the number one person of the global stakeholder section below. The coding of references to stakeholder statements is known to the evaluators only for reasons of anonymity.

<table>
<thead>
<tr>
<th>Nr</th>
<th>Surname</th>
<th>First names</th>
<th>Job function, position</th>
<th>Institution</th>
</tr>
</thead>
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Accountable Mining Program – Sierra Leone Chapter (INTSL_1,2,3 etc.)

Accountable Mining Program – Zambia Chapter (INTZM_1,2,3 etc.)
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**Accountable Mining Program – Australia Chapter (INTAU_1,2,3 etc.)**

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<td>Environmental Defenders Office</td>
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</tbody>
</table>
Annex IV: List of references

**Standard programme documents**
TI (N/A) M4SD Phase II Proposal to BHPF, unpublished document.

**Programme plans and monitoring**
TI (2017 ff.) National Action Plans (NAPs) of Australia, Cambodia, Canada, Chile, Colombia, DRC, Guatemala, Indonesia, Kenya, Liberia, Mongolia, Peru, Sierra Leone, South Africa, Zambia and Zimbabwe
TI (N/A) Chapter Capacity Assessment and Plan, unpublished document.

**Programme evaluations**

**Further programme documents**


