Mid-Term Evaluation of the Anti-Corruption: Delivering Change (AC:DC) Programme

Transparency International

FINAL EVALUATION REPORT
Volume I

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Mid-Term Evaluation of the Anti-Corruption: Delivering Change (AC:DC) Programme
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### Document control

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# Programme identification details

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| **Target groups – wider beneficiaries** | Advocacy and Legal Advice Centres (ALACs) = Government Authorities & General Public in 25 countries  
Evidence-based Advocacy = Government Authorities, Non-state Actors, including academics & experts & General Public in 25 countries |
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## Abbreviations

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<tr>
<td>AC:DC</td>
<td>Anti-Corruption: Delivering Change</td>
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<td>ALAC</td>
<td>Advocacy and Legal Advice Centre</td>
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<td>AMC</td>
<td>Accountability Monitoring Committee</td>
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<td>CAR</td>
<td>capability, accountability, responsiveness</td>
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<td>CSO</td>
<td>civil society organisation</td>
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<td>DFID</td>
<td>(UK) Department for International Development</td>
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<td>FDI</td>
<td>foreign direct investment</td>
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<td>GTF</td>
<td>Governance and Transparency Fund</td>
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<td>IADB</td>
<td>Inter-American Development Bank</td>
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<td>LFA</td>
<td>log frame assessment</td>
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<td>M&amp;E</td>
<td>monitoring and evaluation</td>
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<td>MoU</td>
<td>memorandum of understanding</td>
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<td>MSC</td>
<td>most significant change</td>
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<td>MTE</td>
<td>mid-term evaluation</td>
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<td>NC</td>
<td>National Chapter</td>
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<td>NGO</td>
<td>non-government organisation</td>
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<td>NIS</td>
<td>National Integrity System</td>
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<td>OECD</td>
<td>Organisation for Economic Cooperation and Development</td>
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<td>OSF-BH</td>
<td>Open Society Fund–Bosnia and Herzegovina</td>
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<td>PNG</td>
<td>Papua New Guinea</td>
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<tr>
<td>RSI</td>
<td>Research, Stakeholders, Implementation</td>
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<td>TI</td>
<td>Transparency International</td>
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<td>TI-BiH</td>
<td>TI Bosnia and Herzegovina</td>
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<td>TI-G</td>
<td>TI Georgia</td>
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<td>TIM</td>
<td>Transparency International Mediterranean</td>
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<td>TI-N</td>
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<td>TI Secretariat</td>
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<td>TI-Z</td>
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<td>ToR</td>
<td>terms of reference</td>
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<td>UNCAC</td>
<td>United Nations Convention against Corruption</td>
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Executive summary

This Mid-Term Evaluation of the Anti-Corruption: Delivering Change (AC:DC) programme has been carried out by GHK Consulting over a period from December 2010 to April 2011. The purpose is to evaluate the initial impact of the AC:DC programme and to draw lessons for the improvement of the programme for the remainder of its life-cycle. The evaluation is based on visits to participating National Chapters (NCs) in four countries – Zimbabwe, Bosnia, Georgia and Nicaragua – as well as documentary evidence from 23 countries currently covered by the programme and meetings with TI-S staff in Berlin.

Introduction

The Anti-Corruption: Delivering Change Programme is a £4.7 million initiative implemented by Transparency International (TI) which aims to increase standards of governance and transparency by empowering TI NCs and citizens to address corruption through evidence-based advocacy and the pursuit of corruption-related complaints. Its goal is to improve standards of governance, levels of transparency and reduce corruption in 25 countries.

The AC:DC programme runs from September 2008 to September 2013, and works through two main components:

1. **ALACs** The creation of Advocacy and Legal Advice Centres to provide legal advice to victims and witnesses of corruption; and undertake interventions and campaigns with the aim of promoting more effective public complaints mechanisms and responses by competent authorities and other governance reforms.

2. **Evidence-based advocacy** National, regional and municipal studies to analyse the cause and extent of corruption, the adequacy and effectiveness of national anti-corruption efforts and conformity with international anti-corruption conventions. In some countries, the AC:DC programme funds campaigns which do not necessarily include a research component.

The AC:DC programme is funded by the Governance and Transparency Fund (GTF) of the UK’s Department for International Development (DFID).

Programme goals and relevance

The objective and purpose of the AC:DC programme are defined in the programme log frame, which identifies the following goal, purpose and results/outputs:

- **Goal** To improve standards of governance, levels of transparency and reduce corruption in 25 countries
- **Purpose** To promote evidence-based anti-corruption policy and practice by public and non-state actors
- **Output 1** Strong knowledge and evidence base on anti-corruption issues
- **Output 2** NC demand for improved anticorruption policies and practices
- **Output 3** Public institutions and non-state actors engaged in the fight against corruption
- **Output 4** Capacity of NCs and citizens to engage in and pursue anti-corruption activities

Relevance: Alignment with GTF

The AC:DC programme is well aligned with GTF priorities in terms of the GTF goal of more capable, accountable and responsive government. The programme contributes to this goal by working on both the demand (civil society) as well as the supply (government) side, with natural strengths on the demand side which lever TI’s international credibility and reputation to hold government to account. It responds directly to Output 6 of the GTF log frame: ‘Accountability – Strengthened CSOs’ engagement in the fight against corruption’.

While the programme with its stated objectives is relevant, the degree of relevance in terms of alignment with the GTF declines somewhat at project level. The scale of the programme, in 23 countries, has brought together a diverse set of projects which have had to be encompassed within a single log frame, but where the linkages and synergies between projects are somewhat weak.
Local relevance is strong in the case of the ALAC concept, which has proven a remarkably flexible framework which can be readily tailored to local needs and demands.

Performance assessment

Effectiveness

The evidence of the country visits is that implementation of the projects is largely effective if, in the case of the NIS, substantially delayed. The tried and tested (and evolving) model of the ALAC, and the fact that the AC:DC projects are part of a global programme from which they are able to draw lessons, further underpins effectiveness.

Project-level effectiveness is helped by very effective management at programme level. Each project is able to draw on support from the relevant regional department within the TI-S and on technical assistance within its specific thematic area, as well as on the full-time AC:DC programme management staff.

There was some isolated dissatisfaction with decision-making processes by the TI-S, which were said in interview to be weakened by poor communication and consultation. Among project staff within the NCs, however, there was unanimous appreciation of the way in which the programme has been managed from Berlin. The TI-S is reported to be responsive, timely and constructive.

Achievement of intermediate results

The MTE ToR identifies a set of intermediate results that are expected to be visible at this stage.

- **New knowledge generated** The AC:DC is TI’s largest ALAC programme, and the 15 ALACs within it are playing an important and valuable part in building the global ALAC database. Over the two and a half years of the programme they have contributed a significant amount of information to the database which – with six of the ALACs in Africa – sheds light particularly on issues that are specific to poor African contexts and some particularly difficult contexts.

  In the case of the NIS projects, it was evident in Georgia that the NIS addresses an important information gap in a context in which the government, having effectively implemented an anti-corruption campaign against petty corruption, considers that it has dealt with corruption and that it is off the agenda. The NIS will confirm whether this is indeed the case, or whether (as suspected) grand scale corruption remains a risk.

  In the case of the non-ALAC, non-NIS projects, activities and deliverables appear to be somewhat thinner. The NC in Chile has highlighted a number of internal and external issues which have hindered progress; and in Venezuela foreign exchange controls have meant that the TI-S is no longer able to remit funds and the project is having to be wound down.

- **Demand for change (advocacy)** The data being gathered by the AC:DC monitoring tool suggests a fairly active advocacy programme and projects such as the one in Nicaragua substantially contribute to this.

  The evidence from the evaluation visits to the other three countries, however, suggests a more muted engagement on the advocacy front. Advocacy in Zimbabwe, for instance, with its new ALAC, is currently focused on local, single issues. Several of the stories emerging from Zimbabwe are concerned with the ALAC’s work to publicise specific cases (without yet being able to report a resolution). The gender work, however, suggests that momentum is building for a more concerted and strategic advocacy effort.

  In Georgia, design and implementation of advocacy activities will follow completion of the NIS report and the NIS stakeholder workshop.

  Elsewhere – and particularly in the Latin American countries – advocacy activities appear to be being implemented as a more routine activity and, in some cases, as the core activity of the AC:DC project.

- **Citizens and communities empowered** The ALACs are having a catalytic effect in empowering citizens and communities to address the corruption issues they face in their daily lives. Indeed,
there is a fine line to tread in terms of outreach work and expectations raised by the ALACs – particularly where limited resources constrain the number of cases they are able to take on.

An important dimension of citizen empowerment that is acknowledged across the ALACs is access. The ALACs are invariably located in capital or large cities. Rural and low income communities generally have lower access to its services. And the data clearly show that women also access the ALACs less. Across the ALACs, this is to some extent addressed through their outreach work, road shows and mobile legal aid clinics.

- **Partnerships with non-state actors** The data gathered by the monitoring tool and the evaluation’s observations in the countries visited are consistent in that NCs generally benefit from strong and collaborative partnerships with non-state actors, many of which are closely aligned to TI objectives and/or complement TI expertise in areas such as the provision of legal advice.

- **Partnerships with public authorities** Partnerships with public authorities make up the majority of all partnerships, with a variable degree of collaboration. NCs recognise that relationship-building with government is critical to the success of the AC:DC programme. Consequently, several partnerships are at the level of ‘communication’ and are limited to the provision of information which may be of use to certain government departments.

With the exception of Nicaragua, the countries visited have managed to build good relationships with government which may be at an early stage in terms of the degree of collaboration, but serve as potential entry points for future advocacy activities.

- **Capacity of NCs to deliver the programme** TI’s national chapters have demonstrated significant capacity in implementing AC:DC projects. The level of expertise and motivation is impressive and the ability to draw on substantial programme management and technical resources from the TI-S provides an important supporting structure. Although the AC:DC project is new to most of the participating NCs, their ability to draw on the broader experience of the TI movement and well-established implementation modalities for ALACs and NIS studies has been an important factor in the progress that has been achieved to date.

Capacity building provided by the TI-S has mostly been well-received, however the extent of capacity building has been limited in terms of the number of events and the range of topics covered. (There have been several visits by TI-S staff to participating NCs.)

**Performance against log frame**

The evaluation has assessed the AC:DC programme’s performance against the log frame, by purpose and outputs.

At **purpose** level, a total of 82 policy changes had been recorded to December 2010 in Y3, an increase on 57 at the end of Y2 (March 2010). The average degree of change increased from 2.22 to 2.5 (2 indicates ‘policy development’ and 3 indicates ‘policy adoption’). Currently, it is the ALACs within the AC:DC programme that are showing signs of being able to catalyse evidence-based anti-corruption policy and practice by public and non-state actors, but at limited scale.

At **output** level, the following observations were made:

- **Output 1: Strong knowledge and evidence base on anti-corruption issues** The quality of the research produced by TI is generally considered to be high. There is broad confidence that the report will be of a high standard. NIS reports for both Georgia and Armenia are significantly delayed, however. The ALACs are also proving an effective means of building a powerful evidence base which is mapping the dimensions of corruption, albeit at local level.

- **Output 2: NC demand for improved anti-corruption policies and practices** The NCs visited in Zimbabwe, Bosnia and Nicaragua are all engaged in campaigns at different levels to bring about improved anti-corruption policies and practices. In Georgia, AC:DC advocacy activities will be identified and prioritised through the NIS workshop which will be held on completion of the research to disseminate the findings to stakeholders in Georgia.

The total number of advocacy campaigns across the AC:DC portfolio in Y3 was 157, compared with 88 in Y2, representing an increase of 78 per cent and outstripping the 40 per cent log frame
Output 3: Public institutions and non-state actors engaged in the fight against corruption

The greatest absolute number of NC partnerships across the AC:DC programme is with government, rather than civil society, media or the private sector – although Y3 saw a decline in partnerships with government while other partnerships increased. The data show that the level of involvement (degree of integration) is less in the case of government, and this is borne out by the evidence from the country visits, although is not necessarily the case in other countries in Latin America or Africa and the Middle East. Partnerships are necessarily dynamic in nature and may be weaker at some times and with some agencies.

At portfolio level, the total number of partnerships recorded in Y3 was 563, compared with 437 in Y2. The average degree of integration declined from 1.6 to 1.21 (1 indicates ‘communication’ and 2 ‘cooperation’).

Impact: Making a difference in the lives of citizens and communities

The AC:DC funding has had a clear, direct impact in terms of having established ALACs which are making a difference in the lives of some victims and witnesses of corruption. Of the projects in the AC:DC portfolio, this is the most visible impact to date. Citizens have a greater awareness of corruption issues, and the work of the ALACs is demonstrating that if they take a stand against corruption there are channels for redress and that, through their actions, the perpetrators of corruption can be called to account. This is important in building citizen capacity for addressing corruption – both in terms of their awareness and their willingness to report corruption.

In contexts in which the anti-corruption policy framework is reasonably good, this demand-side strengthening is an important incentive for bringing about more effective implementation and enforcement of anti-corruption policy. Several reported successes have been a matter of enforcement of existing rules.

By 2010, across the portfolio, 341 cases had been successfully closed out of a total of 1,374 (25 per cent).

Evidence of impact in policy and practice is more limited; and this is borne out by the numbers being reported through the AC:DC monitoring tool. Although 82 policy impacts were reported to December 2010, it should be noted that these impacts may be anywhere along the scale from ‘change in discourse’ (1) to ‘change in culture’ (6). The view of the evaluation team is that clear evidence of impact is reflected in a score of 3 and higher, which indicates policy adoption. The average score in Y3 is 2.5, compared with 2.22 in Y2. This reflects a range from 1.5 for the non-ALAC, non-NIS projects to 4 for three policy impacts reported by the NIS projects. This view differs from that of TI, which is that achievements along the policy scale, from change in discourse, constitute policy impact.

The example of Bosnia illustrates the wider challenge of moving from change in policy to change in practice: while policy change has been successfully introduced and legislation is in place, the will to enforce and implement it is lacking. Consequently, new policies go unheeded and the practice of corruption is unchanged. The inability to bring about systemic change in practice similarly frustrates the efforts of the ALAC in Zimbabwe where cases reported by the ALAC come to trial but the trial itself is subject to untransparent practices and alleged perpetrators of corruption are released.

Efficiency and value for money

The evaluation's conclusion is that the AC:DC programme is providing good value for money. It appears that the ALACs outperform other components in terms of providing visible impact for a budget that is still fairly small. Key drivers of value for money have been the programme’s alignment with GTF priorities; the ability of the ALACs to attract further funding on top of the AC:DC grant; and the fact that

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1 Based on TI Monitoring Tool Analysis, by thematic area
2 Defined as ‘Alteration of way targeted representatives communicate verbally or in writing on the topic’. Indicative activities include verbal support for proposed changes and changes in written documents, but not at sufficient level to alter direction of policy
ALACs and the NIS studies draw on TI’s broader and longer-term institutional knowledge and experience of implementing these projects.

The value for money provided by the TI-S remains an open question in view of the high share of the budget (28 per cent) that is spent in Berlin. Of this, 14 per cent relates to pure programme management and M&E costs; a further 13.7 per cent is allocated to technical support and capacity development for the chapters. The resources provided in support of the AC:DC programme are clearly well appreciated by the NCs, but they do come at a high cost. The evaluation’s concern is that the discretion of the TI-S over such a large portion of the budget has implications for principles of aid effectiveness in terms of ownership and alignment.

It might be helpful if, going forward, the TI-S could provide greater clarity over what is to be provided in terms of capacity development, both from the dedicated capacity development budget as well as from the TI-S budget, over and above the daily support provided by regional and thematic teams. This would help to provide transparency for the NCs with regard to what support they can expect to receive over the second half of the programme, beyond the day-to-day. NCs have requested more capacity building – and particularly opportunities for lesson sharing.

Sustainability

The issue of sustainability is concerned with the extent to which the models applied, the practice learnt and the benefits gained sustain beyond the life of the programme. The non-ALAC projects are all planned to complete within the term of the AC:DC funding; here, the question is whether their outputs will sustain – in terms of evidence found and advocacy campaigns and partnerships.

The ALACs within the AC:DC programme suffer from the usual risks to sustainability from project-based funding and a shortage of core funds. In Zimbabwe, the ALAC is facing short-term unpredictability as one round of funding comes to an end. That said, over the longer term the momentum and demand for ALACs is good and popular among donors. Local fund-raising efforts have been very successful and the likelihood is that the ALACs will continue to be funded, even if visibility continues to be short term. Of course, this may not be the case in all countries; and the disadvantage is that long-term planning is made difficult.

Sustainability is underpinned by the strong capacity of NC and ALAC staff in the countries visited for the evaluation.

The AC:DC logical framework

The objective and purpose of the AC:DC programme are defined in the programme log frame, last revised in February 2010. The log frame provides a clear statement of the programme goal, purpose and outputs, which is relevant to the activities being implemented at NC level. The NCs visited for the evaluation demonstrated a good understanding of the purpose of achieving change in government policy. However, the evaluation team’s analysis has identified two particular issues:

- **Establishing the logic** The link from output/result to purpose level is something of a leap, and it is not evident how the outputs will deliver the purpose. Furthermore, the log frame has not been developed below output level: although the components of the programme are shown, their activities are not detailed so their expected contribution to delivering programme outputs is not explained.

- **Ambitious purpose but unambitious outputs** The purpose-level objective, of bringing about evidence-based anti-corruption policy and practice by public and non-state actors appears ambitious in the context of the available resources and timeframe – particularly in terms of the expectation of achieving change in practice. In particular, the purpose appears beyond the combined achievement of limited log frame outputs.

Log frame indicators: some innovative tools for performance measurement

The mix of methodologies for monitoring the AC:DC programme is impressive in that it offers a holistic approach balancing quantitative methods with the more qualitative Most Significant Change (MSC) methodology, and provides tools for measuring less tangible dimensions.
However, the suite of tools for monitoring the AC:DC programme is a work in progress and, to some extent, dependent on activities external to the AC:DC programme (eg development of a new ALAC database). The evaluation’s analysis has highlighted a number of areas for further work or improvement including incomplete data, internal focus, narrow scope of indicators, and insufficient specificity of log frame indicators.

The TI monitoring tool has clear potential to capture progress on difficult-to-measure dimensions, however the evaluation’s reading of the scales, and subsequent discussion with the TI-S, has highlighted not only their usefulness but also the extent to which they may be open to misinterpretation, especially when used as performance indicators in the log frame. Some care therefore needs to be taken in the presentation of results.

Achievements, challenges and lessons

Achievements and innovations

The top-line achievements and innovations of the AC:DC programme have been:

- The successful launch of ALACs in 12 countries – with, in some cases (Vanuatu), more success than they could handle;
- Successful cases at community level in Fiji, Rwanda and Montenegro;
- Some important successes in advocacy and bringing about new policies in Liberia and Bosnia;
- The innovation of community level outreach and monitoring groups to extend the work of the ALACs in Nepal, Fiji, Pakistan, Rwanda, Zimbabwe and Kenya;
- Development of an evidence base in many of the countries from which it will be possible to plan advocacy campaigns and provide a platform for action;
- Building partnerships/coalitions with other CSOs that share a similar outlook. These are of variable depth but in certain instances, for example Bosnia, they have acted as a multiplier of demand for greater accountability by state institutions;
- Effective management of a large, ambitious programme in which NCs all feel well supported;
- The innovation of the partnership, advocacy and policy scales which have the potential to serve as an incentive as well as a monitoring tool.

The achievements and innovations point to the following set of positive lessons.

- **ALAC demand: Responding to a broad set of needs builds trust** The stories that have emerged from the ALACs indicate that even among the cases that are taken up, several of them are not strictly issues of corruption but relate instead to, for instance, human rights abuses or broad issues of transparency. Yet clients are not turned away. Where they cannot be helped by the ALAC, they are invariably referred on. **This openness to a broad demand is playing an important role in building trust** in contexts in which there are significant disincentives for victims and witnesses of corruption to come forward.

- **A grassroots presence extends outreach through trusted individuals, and improves access and demand** The use of existing social capital at community level has proven an effective means of extending the ALAC’s outreach and building trust, particularly in terms of providing access for vulnerable and marginalised communities and individuals. In Zimbabwe, the ALAC is working through trusted individuals who are already active within local communities; there are also opportunities to work through formal, established community networks.

- **Unexpected partnerships with government open up alternative paths to change** Government channels for beginning to bring about change have proven to be non-obvious and often tangential. In Zimbabwe an important government partnership is with the Department of Immigration. In Latin America, NCs are finding that they can be more effective by working through local or municipal government than trying to access obvious ministries and departments at national level. These NCs have been open and opportunistic in their approach to government partnerships, and this is paying off in terms of improving access to decision-makers and the potential to strengthen TI’s influence with policymakers.
Partnerships with CSOs build demand for change Where it is possible to build partnerships with like-minded organisations that share similar ideals in terms of increasing accountability of state institutions it can multiply the effectiveness of the demand for change.

Horizontal exchange builds and maintains momentum and long-term networking There is significant demand for more horizontal sharing events which would help to build a sense of a community of practice, whether it be around the AC:DC programme or at a smaller thematic or regional scale.

Coalition building: Research projects that set the stage for advocacy The introduction of an Advisory Group to review the work of the NIS assessment is a promising idea to establish early-stage engagement with agents of change and build their momentum so that advocacy does not need to be put off until after the research is completed. It is a way of ensuring the research is ‘live’ and reducing the risk that reports will gather dust on the shelf after completion. With some refinement it might be possible to encourage a more active Advisory Group which would help in delivering on some of the goals and objectives of the AC:DC programme.

Challenges
The key challenges faced by the AC:DC programme have been:

Translating the evidence base into strategic advocacy and systemic change The AC:DC programme is now at a stage where projects have built a sufficient evidence base with which to advocate for improved anti-corruption policy and practice. Emphasis needs to be on a strategic – rather than wishlist – approach to advocacy activities: prioritising not only issues where there is greatest need, but also those where there are real prospects and identified channels and mechanisms for delivering change.

Politics in certain countries can be hostile to the efforts of civil society and can make it very difficult for CSOs to operate; in other countries, the political atmosphere can make it very difficult to develop constructive relationships with state organisations.

The scale and ambition of the programme have created challenges in terms of clarity of focus, and the usefulness of the log frame. The programme covers projects in 23 countries (originally 25), across four geographic regions, with three different streams of work. This is a considerable management challenge, especially in view of the relatively small amount of money and the five-year implementation period.

The rationale for some of the non-ALAC, non-NIS projects is not clear, with a limited understanding of how they will contribute to the AC:DC purpose.

Efforts to introduce the MSC methodology have not yet had much traction. The purpose is not always clear to NCs – especially where they are already engaged in producing ‘human interest’ stories, which have a different objective and methodology. The risk is that human interest stories are being submitted as MSC stories.

Gender mainstreaming has also been an important requirement of the GTF which has not been substantially incorporated into the AC:DC programme. Clearly it is still early days in the development of the overall TI-S gender strategy. The work so far has been systematic and comprehensive and has the potential to mainstream gender into the management, practice and results of the organisation. Translating this at NC-level and within programmes such as AC:DC are remaining challenges.

The challenges point to the following set of cautionary lessons.

Prospects for delivering impact at scale are limited From the evidence of the AC:DC ALACs, including the longer-standing Bosnian and Montenegrin ALACs, there is little prospect with the current model and level of resources of building to scale. There is now a need to determine what is sufficient scale to bring about systemic change, and whether ALACs alone can be expected to achieve this?

Defining and achieving ‘systemic change’ needs great care and focus ‘Systemic’ change, or ‘change in policy and practice’ is not limited to new or changed policy at the national level. Such change could be achieved at local, sector or ministerial level – and the work of some of the Latin
American NCs at municipal or regional level reflects that. The challenge now is to develop the programme, building on the lessons of the first half, so that over the second half the programme focuses more on achieving systemic change – or change in practice.

- **Gender needs to be mainstreamed upfront** The potential for data to determine the extent to which gender is reflected in the project is illustrated in Zimbabwe, where (as is probably typical for ALACs in Africa) access to the ALAC for women is a significant issue and where the research on the gender dimensions of corruption has been a first step in a more gender-nuanced approach.

- **There is scope to make strategic use of politics** While it is important for TI to maintain its non-partisan stance, it is nevertheless important to understand the political dynamics in play in specific contexts in order to be able to design effective advocacy strategies. From the evidence of the country visits, NCs have an innate understanding of these political dynamics – the challenge for the advocacy part of the programme is to make use of that understanding to underpin programme results and impact.

Conclusions and recommendations

Overall, the evaluation team has been impressed by the work of the ALACs, the capacity of NCs, programme flexibility to allow tailoring and innovation at the local level, and the strong sense of purpose and direction within ALACs. The key conclusions are:

- The AC:DC programme has laid down very sound foundations for a programme that will have significant impact: at mid-point there is now an opportunity to focus on ensuring the programme delivers on that promise;

- Key actions to sharpen focus include:
  - Identifying and prioritising issues/sectors where progress can be expected (based on emerging evidence);
  - more strategic advocacy and building coalitions for change which are directly relevant to identified priority issues/sectors;

- Demand for ALACs has been demonstrated: there is now a need to build on their success with some strategic decisions about how the model should be tailored to the local context and priority needs;

- Critical to achieving ‘change in practice’ will be an approach explicitly based on an understanding of incentives and drivers of policy implementation and enforcement.

ALACs are already having an impact. There is currently less visibility over progress and results within the evidence-based advocacy component of the programme, and less opportunity in the way of innovation. While confidence in the ability to deliver impact is lower for these projects, those that are currently completing the ‘evidence base’ part of the project are delivering on the intermediate results in terms of generating new knowledge and defining issues for advocacy.

Both components have been effectively supported by efficient, responsive and motivated programme management from Berlin, both in terms of AC:DC management and TI-S regional and thematic teams. Translating policy change into systemic change or change in practice remains an ambitious goal.

The following recommendations offer some suggestions for consolidating the gains of the AC:DC programme so far and delivering on the promise of the first half of the programme.

**Recommendation 1: Prepare and implement AC:DC capacity building plan** The TI-S should work to an explicit capacity building plan over the second half of the programme. This could form part of a broader document which sets out in general what is to be expected of the TI-S over the second half, by way of being transparent as to central costs and what is to be delivered for those costs. The primary concern, however, is that NCs should have their ongoing capacity building needs assessed and met – and that this should be delivered well before the end of the grant.

**Recommendation 2: Prepare and implement strategic advocacy plans** Following the recent advocacy training provided by the TI-S, all NCs should now be in a position to develop advocacy plans in order to improve the focus and methodology of their advocacy activities. The advocacy plans should be
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developed with the log frame as a reference point, focusing in particular on making the linkages between activities and outputs, and outputs and purpose.

Recommendation 3: Consolidate work on monitoring and performance measurement There is now a need to consolidate the various data sources to enable analysis across the programme and across time. Some of the issues that will need to be addressed include:

- ensure data on all log frame indicators is being captured and clearly presented;
- capture of data on ALAC contacts and cases at community/AMC level;
- ensure that the new ALAC database captures estimated numbers of beneficiaries in the case of a collective client.

Recommendation 4: Develop thinking on use of ALAC community structures Community-level networks are proving to be a successful model for awareness-raising, community mobilisation and identification of petty corruption. They are also providing a valuable advice and referral service for the many non-corruption related challenges which face poor and socially-excluded people. There is a question as to how important this advice service is to the success of the ALACs, and what is the resource requirement. TI needs to take a strategic view on whether a committee such as the AMC needs to provide this kind of service to be successful in awareness-raising, mobilisation and identification of corruption.

Recommendation 5: Use gender disaggregated data to strengthen gender dimensions The fact that the ALACs have started to collect gender disaggregated data provides a starting point for strengthening the mainstreaming of gender, at least within the ALAC component. Suggestions which have emerged from the evaluation include:

- using the Results section of the TI-S gender planning matrix to guide a more strategic approach by the AC:DC to gender mainstreaming;
- strengthening collection/presentation of gender disaggregated data to ensure that all indicators being monitored are being routinely reported;
- aggregating data collected by ALACs for publication both internally and externally to raise awareness of the gender dimensions of corruption;
- using information on differential access to ALACs to adapt them for better access for women, to identify barriers to women in taking up cases and to help them overcome those barriers;
- develop targeted research to identify country-specific areas of corruption which have differential impact on men and women.

Recommendation 6: Consider targeting of vulnerable and marginalised communities and individuals National programmes could examine national data on poverty, vulnerability and social exclusion to identify which communities are most vulnerable and marginalised, in addition to those which are poor.

Recommendation 7: Developing accountability frameworks NIS studies provide a good assessment of a country’s accountability framework: this work (or similar) could be used to inform the identification and development of appropriate accountability tools (eg citizen report cards along the lines of the Kenya experience, and audit reports from supreme audit bodies).

Recommendation 8: Log frame adjustment The evaluation finds that an output comprised of NC demand is not useful either for evaluation purposes or for incentivising performance. It suggests that this should be complemented with an output for citizen demand for improved anti-corruption policy and practice.

It would be useful if the TI-S could develop a fourth scale, a demand scale, with which to measure performance in building citizen demand.

The log frame indicators could be rationalised. Data is currently not being collected for several of them. Those that are dispensable could be removed and for those that are indispensable, there is a need to ensure that the data is being captured and presented in an easy-to-digest format for inclusion in annual reports, and for future evaluators.
1 Introduction

In December 2010, GHK Consulting Ltd was appointed by Transparency International (TI) to carry out the Mid-Term Evaluation of the Anti-Corruption: Delivering Change (AC:DC) programme. Beginning in September 2008, the AC:DC programme works through TI National Chapters (NCs) in, currently, 23 countries on projects which aim to improve standards of governance and levels of transparency, and reduce corruption. The overarching objective of the evaluation at this mid-term stage is to evaluate the initial impact of the AC:DC programme and to draw lessons for the improvement of the programme for the remainder of its life-cycle.

1.1 Evaluation objectives

The purpose of the mid-term evaluation (MTE) is to evaluate the initial impact of the AC:DC programme and to draw lessons for the improvement of the programme for the remainder of its life-cycle.

The main evaluation objectives are:

- Assess the impact of the AC:DC programme on government policy and practice;
- Evaluate the achievement of the intermediate results:
  - new knowledge generated,
  - demand for change (advocacy).
  - citizens (and communities) empowered,
  - partnerships with non-state actors,
  - partnerships with public authorities,
  - capacity of NCs to deliver the programme;
- Gather lessons-learned and best-practice to improve the impact and results of the remainder of the programme.

The target audience comprises DFID, the Transparency International Movement, particularly the 23 participating National Chapters, and TI partners. The client group comprises the Transparency International Secretariat, DFID and the Governance and Transparency Fund Manager, KPMG/Triple Line Consulting.

1.2 Evaluation activities

The contract for this assignment was signed on 21 December 2010, with work commencing at the beginning of January 2011.

Following an inception phase, which included a document review, the field research began at the end of January 2011 with a three-day visit to Berlin to meet AC:DC programme management and other TI-S staff (regional and thematic) involved in implementation of the programme.

Field visits to four countries were carried out over the course of February 2011. They began with a visit by Janet Gardener, David Wilson and Karin Tang to Zimbabwe. Subsequently, David Wilson travelled to Bosnia and Karin Tang travelled to Georgia while Spanish-speaker Zsofia Kovacs travelled to Nicaragua.

An Issues Paper was submitted in mid-March, as a means of providing immediate feedback on the evaluation's top-level findings and emerging issues. A Draft Evaluation Report further developed those findings, within the framework of the evaluation question; and was discussed at a workshop in Berlin at the end of March, together with TI programme management as well representatives from five visiting NCs. This Final Evaluation Report incorporates feedback in response to the Issues Paper and from the Berlin workshop, as well as written comments on the Draft Evaluation Report submitted by TI.
1.3 Structure of report

Following this introductory section, the report briefly describes the context and background to the evaluation in Section 2. Section Error! Reference source not found. reviews the programme goals and assesses their relevance in the context of the GTF. Section 4 provides the main assessment of performance in terms of evaluation criteria of effectiveness and achievement of intermediate results, performance as measured against the log frame, impact, efficiency and sustainability. Section 5 provides an analytical assessment of the evaluation framework, focusing on the programme log frame and indicators. Section 6 summarises the main achievements and challenges encountered, and seeks to draw from these the key lessons emerging from the AC:DC programme. Section 7 concludes with a set of recommendations.
2 Context and background

2.1 Transparency International

Transparency International is a global civil society organisation working to combat corruption. Founded in 1993, it works through a network of autonomous National Chapters in more than 90 countries, focusing on five global priorities:

- Corruption in politics
- Corruption in public contracting
- Corruption in the private sector
- International anti-corruption conventions
- Poverty and development

Key thematic issues include access to information; corruption in the water sector; defence and security; education; global crisis; health; humanitarian assistance; judiciary; and protection of whistle blowers. A further thematic issue is to establish and support Advocacy and Legal Advice Centres (ALACs), which today exist in more than 40 countries.

TI’s International Secretariat (TI-S) coordinates initiatives within and across geographical regions; provides methodological support; and assists National Chapters in enhancing their anti-corruption skills. It drives work on international issues; and serves as a knowledge management centre, capturing the lessons from individual projects and programmes, and disseminating best practice.

2.2 The Anti-Corruption: Delivering Change Programme

The Anti-Corruption: Delivering Change Programme is a £4.7 million initiative which aims to increase standards of governance and transparency by empowering TI NCs and citizens to address corruption through evidence-based advocacy and the pursuit of corruption-related complaints. Its goal is to improve standards of governance, levels of transparency and reduce corruption in 25 countries.

The AC:DC programme runs from September 2008 to September 2013, and works through two main components:

1. **ALACs** The creation of Advocacy and Legal Advice Centres to provide legal advice to victims and witnesses of corruption; and undertake interventions and campaigns with the aim of promoting more effective public complaints mechanisms and responses by competent authorities and other governance reforms.

2. **Evidence-based advocacy** National, regional and municipal studies to analyse the cause and extent of corruption, the adequacy and effectiveness of national anti-corruption efforts and conformity with international anti-corruption conventions. In some countries, the AC:DC programme funds campaigns informed by public surveys or monitoring activities rather than a piece of research (although, for instance, the project in Venezuela was based on research outputs from previous work).

The programme is currently being implemented in 23 countries across TI’s four regions of operation (Table 2.1).

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<th>Table 2.1 AC:DC countries and distribution of activities (March 2011)</th>
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<td>ALACs</td>
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<td>Africa &amp; Middle East</td>
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<td>Evidence-based advocacy</td>
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The evaluation has been able to reflect on three countries, Ethiopia, Venezuela and Palestine, to only a very limited degree (if any). Palestine is a new addition to the AC:DC portfolio. Its ALAC is to be funded under the AC:DC programme after the closure of the DFID-funded Transparency International Mediterranean (TIM) ALAC project at the end of 2010.

In January 2009, Ethiopia passed a revised Charities and Societies Proclamation which severely restricts foreign funding of local NGOs for a broad spectrum of human rights activities. TI has therefore significantly scaled back its funding to Transparency Ethiopia. And changes to the foreign exchange regime in Venezuela in 2010 have made it impossible to continue to transfer funds, and the project is preparing to wind down.

A further three countries – Nigeria, Paraguay and Uruguay – were selected for inclusion, but are no longer carrying out activities. In Nigeria, the project has been frozen since June 2010 when the TI Board decided to suspend the NC due to internal governance and related financial management concerns. The NC in Paraguay was officially disaccredited by TI in December 2009 (before any significant AC:DC activities had taken place). The project has also been dropped in Uruguay following the resignation of AC:DC dedicated staff.

2.2.2 The ALAC and the NIS

The programme builds on two of TI’s established initiatives, the establishment of and support to ALACs, and the preparation of National Integrity System (NIS) assessments.

ALACs are walk- or call-in offices which provide free and confidential legal advice to witnesses and victims of corruption as a means of empowering citizens in the fight against corruption. They help citizens pursue corruption-related complaints, encouraging them to come forward. By using information gained from cases (either individual cases or common themes running through a variety of cases observed), the ALACs are then able to advocate for reform based on very concrete evidence. ALACs, working in the TI multi-stakeholder tradition, aim to create dialogue, informal feedback, and working partnerships with government institutions charged with anti-corruption.

The NIS approach provides a framework for the analysis of the extent and causes of corruption in a given country as well as the effectiveness of national anti-corruption efforts. This analysis is undertaken via a consultative approach, involving the key anti-corruption agents in government, civil society, the business community and other relevant sectors with a view to building momentum, political will and civic pressure for relevant reform initiatives. NIS assessments have been carried out since 2001 in 80 countries.

2.2.3 Programme funding and fund management

The AC:DC programme is funded by the UK’s Department for International Development through its Governance and Transparency Fund (GTF). The GTF is a £130 million fund designed to help citizens hold their governments to account by strengthening groups that can empower and support them.
3 Programme goals and relevance

Key Evaluation Question
What does the programme as a whole and its sub-projects set out to achieve?

The objective and purpose of the AC:DC programme are defined in the programme log frame, which identifies the following goal, purpose and results/outputs:

- **Goal** To improve standards of governance, levels of transparency and reduce corruption in 25 countries
- **Purpose** To promote evidence-based anti-corruption policy and practice by public and non-state actors
- **Output 1** Strong knowledge and evidence base on anti-corruption issues
- **Output 2** NC demand for improved anticorruption policies and practices
- **Output 3** Public institutions and non-state actors engaged in the fight against corruption
- **Output 4** Capacity of NCs and citizens to engage in and pursue anti-corruption activities

Separate log frames have also been developed for ALAC and NIS projects. Most NCs have developed project-level log frames either based on these, or developed independently. An assessment of performance against the programme log frame indicators is provided in Section 4.3 and an analysis of the logical framework is provided in Section 5.

The terms of reference identify a set of intermediate results expected at mid term. These are:

- new knowledge generated,
- demand for change (advocacy),
- citizens and communities empowered,
- partnerships with non-state actors,
- partnerships with public authorities,
- capacity of NCs to deliver the programme.

Section 4.2 assesses the extent to which these have been achieved.

3.1 Relevance: Alignment with GTF

The GTF aims to help citizens hold their governments to account through strengthening the wide range of groups that can empower and support them.

Good governance depends critically on effective citizen voice and the ability of citizens to hold those with power to account. Without it, corruption can flourish. The AC:DC programme helps to fight corruption by enabling and strengthening citizen voice through a set of different approaches – the ALACs, the NIS studies and the evidence-based advocacy. Directly, the AC:DC programme strengthens citizen voice by strengthening the TI national chapters through which it is implemented, as well as through its partnerships with a range of state and non-state actors. Beyond this, the ALACs also strengthen citizen voice at the grassroots by providing a channel for ordinary citizens to report corruption.

This section considers the relevance of the AC:DC programme through its alignment with the GTF at both programme and project level.

3.1.1 Programme relevance

The evaluation questions ask whether the objective and purpose of the programme are clearly defined relevant to addressing the capacity, accountability and responsiveness of government.

DFID’s Capability, Accountability, Responsiveness (CAR) framework is not reflected in the programme design, or used to structure or monitor it. However, the AC:DC programme is well aligned with GTF priorities in terms of the GTF goal of more capable, accountable and...
responsive government. The programme contributes to this goal by working to strengthen the demand side (civil society) as well as lobbying for change on the supply (government) side, with natural strengths on the demand side which lever TI’s international credibility and reputation to hold government to account.

The AC:DC programme also responds directly to Output 6 of the GTF log frame: ‘Accountability – Strengthened CSOs’ engagement in the fight against corruption’. The AC:DC programme has been instrumental in building NC capacity, even if only by providing them with sufficient long-term funding to give them some degree of stability and predictability over the five years of the grant. Other benefits to the NCs include spill overs to country programmes from the information coming out of the ALACs, and a raised profile; as well as increased research and analytical skills, with the introduction of new research methodologies. Elsewhere, NCs are strengthening civil society capacity in general, most notably in Nicaragua where the AC:DC programme has funded the building of a civil society coalition to lobby for electoral reform.

The AC:DC programme is also relevant to Outputs 4 and 7 (4. Increased access by citizens to the decision making processes of government, parliaments or assemblies and greater impact on them; and 7. Increased opportunities for people to influence and determine policy and legislation).

Where it falls somewhat short of the GTF’s intention is in the emphasis of the AC:DC log frame on building NC capacity to hold governments to account, rather than building citizen capacity. In practice, this is being achieved to some extent by the ALACs – but is not being monitored. The ALAC pillar of the AC:DC programme is therefore better aligned to the GTF than the non-ALAC projects.

3.1.2 Project relevance

While the programme with its stated objectives is relevant in terms of alignment with the GTF, the degree of relevance declines somewhat at project level. The wide scope and diversity of the projects in the portfolio tends to undermine the programme-level coherence and logic. The ambitious scale of the programme, in 23 countries, has brought together a diverse set of projects which have had to be encompassed within a single log frame, but where the linkages and synergies between projects are somewhat weak. As a consequence, projects do not identify or recognise themselves as belonging to the AC:DC ‘family’, resulting in some disjointedness between the ALAC, research and politics components. There is limited horizontal coordination across the separate themes, and some sense among the Latin American evidence-based advocacy projects of being somewhat marginal to an overall programme which is very much focused on ALACs.

Project identification process and local relevance

Broadly, it appears that projects are locally relevant. This is particularly the case with the ALAC concept, which has proven a remarkably flexible framework which can be readily tailored to local needs and demands. This is illustrated in Zimbabwe, where the use of Accountability Monitoring Committees (AMCs) reflects a context in which access to mass media is limited. Mostly, NCs identified their own projects.

However, the process of project identification for Georgia raises a concern. Georgia’s proposal was for an ALAC; it was decided, with apparently little consultation, that it would receive funding for an NIS study. Although the NC now considers the NIS to be relevant and appropriate to the current context in Georgia, the process is a cause for concern. TI-G does now have an ALAC, which suggests that the original proposal was sound.

Engagement with government and strong non-partisan stance

The objective of improving the capacity of government to be more accountable and responsive is perhaps less emphasised compared with building citizen voice. It is certainly more difficult to achieve in the countries concerned. Concerns have been raised over whether engagement with government endangers the non-partisan stance of TI. In the countries visited for the evaluation there was no sign that TI’s independence is at risk.
Indeed, it is where TI is working as a partner of government – rather than in a traditional civil society role in consultation or as an observer of government processes – that real opportunities for change are seen. In Zimbabwe, where TI-Z has been providing training to government, there are signs of a relationship of trust being built up which taps into pockets of political will, opening up windows of opportunity for TI-Z to work with government in pushing for change, with correspondingly higher prospects for success. Although TI has had to be careful to safeguard its non-partisan reputation, there was little evidence that – even in contexts where political intimidation of civil society is routine – independence is at risk. TI’s global reputation, and its ability to influence the international community, is an important determinant of this independence.

If anything, the findings of the evaluation suggest the need for increased engagement with government for more effective implementation, as the NCs have so far demonstrated that they are able to manage the relationship with government to retain sufficient arm’s length distance to protect their independence and reputation, and to pursue objectives of achieving change in practice.
4 Performance assessment

Key Evaluation Question
Has the programme as a whole and its sub-projects achieved what they set out to achieve?

Overall, the evaluation team has been impressed by the work of the ALACs, the capacity of NCs, programme flexibility to allow tailoring and innovation at the local level, and the strong sense of purpose and direction within ALACs. There is currently less visibility over progress and results within the evidence-based advocacy component of the programme, and less opportunity in the way of innovation. Both components have been effectively supported by efficient, responsive and motivated programme management from Berlin, both in terms of AC:DC management and TI-S regional and thematic teams.

ALACs: Wide replication and accelerating momentum

The AC:DC programme has played an important role within the overall TI programme in supporting the replication of the ALAC concept, which has shown itself to be a robustly flexible framework applicable across diverse governance contexts. There are currently more than 63 ALACs in 47 countries, from Haiti to Moscow, with growing interest in OECD countries.

For TI, the ALACs fulfil an important function in addressing both sides of the accountability equation. Traditionally, TI has focused on the supply side of accountability, lobbying governments to implement anti-corruption reforms to increase transparency and improve governance and accountability mechanisms and institutions. Through the ALACs, TI extends its engagement to the demand side, and down to the community level. The ALACs serve as a platform for outreach, awareness raising and building demand capacity; for building an evidence base for its advocacy work and for informing and shaping the direction of its research and policy work.

Of the 15 ALACs funded by the AC:DC programme, 12 were started under the programme. The AC:DC seed funding has succeeded in catalysing a much larger volume of funding; and NC staff in Zimbabwe emphasised how important it has been at the local level to have DFID funding which, however small, provides other donors with the confidence to also contribute. For the previously established ALACs, the five-year term of the grant has helped to provide a degree of security and stability that has not been possible as long as funding for the ALAC was limited to one or two years, or less. This has helped to reduce issues such as staff turnover.

Momentum for the ALACs – both across the TI movement and at country level – is strong. They have succeeded in enlisting multi-stakeholder participation, including both government and civil society partners.

In Zimbabwe, this has extended to the grassroots level with the creation of Accountability Monitoring Committees, community-level volunteers working to extend the ALAC’s outreach and provide access for those who face social or physical barriers to contacting the ALAC. The ALAC is generating useful information for the broader work of TI-Z; and gender disaggregated data on outreach, contacts and cases provided the impetus for TI-Z’s recent research on gender-related dimensions of corruption.

In Bosnia, the chapter has worked together with the Open Society Fund–Bosnia and Herzegovina (OSF-BH) to lobby for a national anti-corruption strategy. Based on the work of the ALACs they prepared proposals for an anti-corruption strategy that was adopted by the Council of Ministers which also agreed to the creation of an anti-corruption agency. This is a good example of an NC taking advantage of an ‘opening’ which arose for political reasons. A group of NGOs seized the opportunity presented by the desire of the Bosnian government for relaxed visa restrictions on their citizens to lobby the international community. A credible anti-corruption strategy was one of the conditions for relaxing the visa restrictions.
Evidence-based advocacy: Steady progress

While achievements by the evidence-based advocacy projects of the AC:DC portfolio are, at this mid-term stage, less tangible, there has been steady progress on the projects visited.

The preparation of the NIS in Georgia is nearing its conclusion and there is confidence among stakeholders that the quality of analysis is high. TI-G has been able to constitute an impressive advisory group, the members of which are each potential champions for the policy and systemic change that is the ultimate goal of the project. TI-G routinely shares and discusses issues and findings of the NIS with the wider TI-G team which has had a two-way benefit in terms of providing feedback on the NIS work in progress as well as keeping TI-G up-to-date with emerging findings and sharing methodological and analytical debates. This has served a capacity building function across the TI-G team.

In Nicaragua, the project has funded the creation and operation of a civil society coalition, the Electoral Reform Promoter Group, to lobby for electoral reform and to increase the capacity and participation of civil society in advocating for reform. An electoral reform proposal has been developed. Training and awareness raising activities have been carried out. However, the project has been focusing on ‘quick wins’ pending national elections in November 2011.

4.1 Effectiveness

The evidence of the country visits is that implementation of the projects is largely effective if, in the case of the NIS, substantially delayed. In the case of the ALACs, strong NC capacity, flexibility, a good understanding of the political context and how to work within that and efficient administration and management all contribute to the overall effectiveness of implementation. The tried and tested (and evolving) model of the ALAC, and the fact that the AC:DC projects are part of a global programme from which they are able to draw lessons, further underpins the effectiveness.

Similarly, the NIS studies are able to benefit from the learning of earlier NIS studies as well as the work of other ongoing NIS studies. Capacity to complete the research is good. Where the NIS has been less effective, at least in Georgia, is in its ability to bring together the members of the advisory group. As well as validating the NIS scores, the advisory group is intended as a platform for starting to discuss the issues emerging from the NIS and how they might be addressed. In this role, the advisory group provides a critical link between the research and the advocacy components. While communications with the advisory group may not have been regular enough to sustain momentum, the terms of reference for the advisory group are also very broad and demanding – requiring members to read a large volume of material, as well as providing assistance in research and outreach, building the NC’s network and contacts and assisting in the promotion of NIS findings and recommendations. This may require reviewing, or a different arrangement in terms of distribution of tasks within the NC.

In Nicaragua, the NC has been effective in bringing together an impressive number of organisations within the civil society coalition. However, progress since then appears to have drifted. The inability to engage government has led to challenges in maintaining the network. It is hoped that the upcoming elections will help to renew focus and momentum.

Project-level effectiveness is underpinned by very effective management at programme level. Each project is able to draw on support from the relevant regional department within the TI-S and on technical assistance within its specific thematic area, as well as on the full-time AC:DC programme management staff. The response rate, for instance, to the self-assessment survey for the MTE, was beyond expectations, thanks to the availability of regional coordinators to follow up and ensure submission.

There was some isolated dissatisfaction with decision-making processes by the TI-S, which were said to be weakened by poor communication and consultation. Among project staff within the NCs, however, there was unanimous appreciation of the way in which the programme has been managed from Berlin. The TI-S is reported to be responsive, timely and constructive.
This is particularly evident in the efforts that have gone into establishing the programme’s performance management framework and information gathering tools, particularly the partnership, advocacy and policy scales (see Section 5.1.2). These are still a work in progress, with more work needed to ensure the NCs are completing them accurately and consistently. However, the preliminary analysis emerging from the data provides a clear illustration of the tool’s usability, applicability and relevance, within the AC:DC programme as well as across to other GTF projects.

Programme level effectiveness is also strengthened by the willingness to remove projects from the programme where their performance is at risk.

4.2 Achievement of intermediate results

The MTE ToR identifies a set of intermediate results that are expected to be visible at this stage. These are:

- new knowledge generated,
- demand for change (advocacy),
- citizens and communities empowered,
- partnerships with non-state actors,
- partnerships with public authorities,
- capacity of NCs to deliver the programme.

This section summarises the achievements so far in each of these areas, and identifies issues or challenges.

4.2.1 New knowledge generated

The AC:DC is TI’s largest ALAC programme, and the 15 ALACs within it are playing an important and valuable part in building the global ALAC database. Over the two and a half years of the programme they have contributed a significant amount of information to the database which – with six of the ALACs in Africa – sheds light particularly on issues that are specific to poor African contexts and some particularly difficult contexts in Zimbabwe, Liberia and Palestine.

The AC:DC ALACs benefit from work at the global level to develop and maintain the database (with a full-time ALAC database manager employed in Berlin), and a new generation database is in the process of being rolled out. The new database may well address some of the issues identified in the course of the AC:DC evaluation. These include:

- Sufficient training needs to be provided to NCs in inputting data into the database. Zimbabwe appears to have been underreporting due to a misunderstanding as to how contacts and cases should be defined.

- All ALACs need to be using the same database to ensure cross-country comparison and global level aggregation. Montenegro (a TI partner organisation rather than a national chapter) is using a different system, so its achievements are not being captured in the ALAC database.

- Sufficient capacity is required at NC level to maintain the database. Zimbabwe has collected a certain amount of data on paper which has as yet not been entered electronically due to shortage of resources.

- Presentation of data summaries needs to be better aligned to M&E reporting requirements and log frame targets. Although NC progress reports and the AC:DC Annual Report provide a narrative account of latest data on cases and contacts, a simple table would be a great help in providing a clear overview, comparable over time, and would provide confidence in the comparability of figures. Reporting needs to ensure that basic indicators are covered: for instance, feedback from client satisfaction surveys (the sources of log frame indicator 4.2) is currently not included.
• Support should be provided to NCs such as Nepal, Kenya and Zimbabwe where contacts are being made, and advice given, before the ALAC is even contacted. These are, to an extent, working as an extension of the ALAC, but their efforts are not being captured in the data. The AMC members interviewed in Zimbabwe demonstrated sufficient initiative and capacity to already be keeping a record of their work for the ALAC. This needs to be systematised and included in the ALAC data capture.

In the case of the NIS projects, it was evident in Georgia that the NIS addresses an important information gap in a context in which the government, having effectively implemented an anti-corruption campaign against petty corruption, considers that it has dealt with corruption and that it is off the agenda. The NIS will confirm whether this is indeed the case, or whether (as suspected) grand scale corruption remains a risk. In both Georgia and Armenia the NIS teams have struggled in terms of resource capacity with the need to carry out primary research to investigate the extent of anti-corruption practice. Having done this, however, the findings will provide important new knowledge as the basis for future action. In Ethiopia, it has only been possible to complete the ‘law’ part – and not the ‘practice’ part – of two of the 13 pillars, due to the reluctance of key actors to provide information.

A further three countries are carrying out research projects under the AC:DC programme: Chile, Mexico and Venezuela. Both Chile and Mexico have reported a number of research outputs, most of which have been disseminated. While this is satisfactory in terms of new knowledge generated, the evaluation’s overview of each of the projects raises some concerns. In the case of Chile, activities and deliverables appear to be rather thin given the time that has passed. Indeed, the self-assessment for Chile acknowledges that there has been a lag in implementation of activities, and the MTE workshop in Berlin at the end of March clarified that Chile has been facing a number of internal and external issues which have significantly hampered implementation of its AC:DC project.

In the case of Mexico, where inputs have been more substantial, there are concerns over the ambition of the project and whether it can realistically achieve its objectives within the resources and timeframe of the AC:DC funding (indeed, the Mexico report notes that there is potential IADB funding available which would assist the NC in delivering on the expectations of the DFID project).

In Venezuela, there has been progress on using municipal transparency indicators to evaluate municipalities, although implementation is behind schedule (70 municipalities have been evaluated to date compared with 100 planned for 2010 and 140 for 2011). On the regional government transparency indicators, four out of eight targeted governments are participating. Research outputs have been produced and distributed among conference participants, public officials and the general public. However, progress has been made very difficult since the tightening of foreign exchange rules in 2010 and it is understood that activities are being scaled down as it has become impossible to continue remitting foreign exchange into Venezuela. The project is the largest of all the AC:DC projects – budgeted at £254,000 compared with the next largest at £152,000 – and before the project is wound down it will be important to capture what has been achieved so far and what the options for continuing activities through local funding are.

Of the two projects that were originally included under the ‘politics’ theme of the AC:DC, Colombia has contributed to new knowledge in terms of conducting research. It carried out a set of case studies to understand issues of conflict of interest within the municipal councils that are the focus of its project (‘Increasing Transparency and Accountability in Colombian Congress and Municipal Councils’). Nicaragua has so far carried out a perception survey. Monitoring of party financing is clearly dependent on the timing of the election, and the Crinis study is anticipated after the elections.

4.2.2 Demand for change (advocacy)

NC demand for change, in terms of their advocacy programme, is mapped in Section 4.3.3. The data being gathered by the AC:DC monitoring tool suggests a fairly active advocacy programme and projects such as the one in Nicaragua, which are all about advocacy, substantially contribute to this.
The evidence from the evaluation visits to the other three countries, however, suggests a more muted engagement on the advocacy front. Advocacy in Zimbabwe, with its new ALAC, is currently focused on local, single issues. Several of the stories emerging from Zimbabwe are concerned with the ALAC’s work to publicise specific cases (without yet being able to report a resolution). The gender work, however, suggests that momentum is building for a more concerted and strategic advocacy effort.

Advocacy activities in Bosnia focus on three areas: the establishment of the anti-corruption agency; the operation of the freedom of information legislation; and pushing for improvements in the implementation of conflict of interest legislation.

In Georgia, design and implementation of advocacy activities will follow completion of the NIS report and the NIS stakeholder workshop.

Elsewhere – and particularly in the Latin American countries – advocacy activities appear to be being implemented as a more routine activity and, in some cases, as the core activity of the AC:DC project. In some of these cases, however, advocacy appears to be routine at the expense of being strategic. In terms of delivering the anticipated impacts of the AC:DC programme, it would provide greater confidence to have more evidence of advocacy campaigns being strategically selected and designed – as described in Section 4.4.3. It is expected that advocacy training which took place at the end of March for the evidence-based advocacy component of the programme will strengthen the focus on advocacy deliverables (ie systemic change) and identifying the means for achieving those deliverables through the formulation of advocacy plans.

4.2.3 Citizens and communities empowered

The ALACs are having a catalytic effect in empowering citizens and communities in addressing the corruption issues they are faced with in their daily lives. Indeed, ‘success’ needs to be carefully managed in order to manage expectations raised by the ALACs – particularly where limited resources constrain the number of cases they are able to take on.

In the AC:DC countries, this is just beginning. The ALACs are still building momentum and extending their reach. As the ALACs become more experienced, and as their evidence base builds, it is anticipated that they will become more and more effective in acting as a channel for citizen action on corruption.

An important dimension of citizen empowerment that is acknowledged across the ALACs is access. The ALACs are invariably located in capital or large cities. Rural and low income communities generally have lower access to its services. And the data clearly show that women also access the ALACs less. Across the ALACs, this is to some extent addressed through their outreach work, road shows and mobile legal aid clinics. In Nepal, Kenya and Zimbabwe access has been improved through innovative community-based mechanisms. Rwanda has received funding for a further four ALACs beyond Kigali.

The data that is being gathered by the ALACs provides a valuable source of information for addressing disparities in outreach. There needs to be a particular emphasis on ensuring that women are equally able to access the ALAC and its services. In Zimbabwe, for instance, more contacts are made by women where the ALAC conducts public meetings. This is also very much the case in Kenya, where the ALAC and the NC have made special efforts to target women, and training has been provided for ALAC and NC staff on raising awareness of women on how to serve as leaders and provide input into the new constitution. However, this does not necessarily follow through to an increase in the number of cases being brought by women. In Kenya, cases brought by women have increased markedly between 2009 and 2010, however cases brought by women saw a decline over the same period in Zimbabwe. Clearly, there is significant scope for further work to improve access for women (and Section 7 offers some suggestions).

While empowerment of citizens and communities is critically important in terms of building the demand side of the accountability equation, it is only partially reflected in the AC:DC log frame, under Output 4. There is, therefore, only limited incentive for AC:DC projects to
consider how they respond to the needs and priorities of ordinary citizens in addressing corruption issues.

4.2.4 Partnerships with non-state actors

The data gathered by the monitoring tool and the evaluation’s observations in the countries visited are consistent in that NCs generally benefit from strong and collaborative partnerships with non-state actors, many of which are closely aligned to TI objectives and/or complement TI expertise in areas such as the provision of legal advice. Examples include international NGOs such as the Open Society Foundations; national NGOs active in a range of fields (democracy and electoral reform, human rights, ); women's groups, community and rural development groups; and the print and broadcast media and trade unions. At community level, some of these partners offer significant potential in terms of opportunities to expand the reach of the ALAC.

In some contexts, partnerships may benefit from a degree of formalisation (eg signing of an MoU) to clarify areas of responsibility – especially where there is a risk of overlap and duplication. However, partnerships with non-state actors were generally very good.

4.2.5 Partnerships with public authorities

Partnerships with public authorities make up the majority of all partnerships, with a variable degree of collaboration. NCs recognise that relationship-building with government is critical to the success of the AC:DC programme. Consequently, several partnerships are at the level of ‘communication’ and are limited to the provision of information which may be of use to certain government departments.

Clearly, NCs need to continue to be both strategic and opportunistic in their partnerships with government – maintaining the balance between collaborative partnership and continuing to hold government to account. In Zimbabwe, despite the highly politicised context, the ALAC has successfully responded to the opportunity to work with the Department of Immigration, building TI-Z’s credibility as a trusted partner of government. In Nicaragua, the inability to gain any traction with government at a national level has prompted the NC to look instead at forging local level partnerships, which has been a successful strategy in other Latin American countries. In Georgia, government currently appears to be lukewarm on the NIS study, but much will depend on the final scoring and government sensitivity to international rankings may yet raise the level of interest and engagement with the NIS process.

With the exception of Nicaragua, the countries visited have managed to build good relationships with government, which may be at an early stage in terms of the degree of collaboration but which serve as potential entry points for future advocacy activities. Georgia, where management and personnel changes meant that the NC was for a while less attentive to its government partners, illustrates the fact that these partnerships require persistent effort in terms of relationship management, even if this is only at a ‘maintenance’ level of keeping partners informed of latest activities or updates on projects they are involved in.

4.2.6 Capacity of NCs to deliver the programme

TI’s national chapters have demonstrated significant capacity in implementing AC:DC projects. The level of expertise and motivation is impressive and the ability to draw on substantial programme management and technical resources from the TI-S provides an important supporting structure for implementation of the different activities of the AC:DC programme. Although the AC:DC project is new to most of the participating NCs, their ability to draw on the broader experience of the TI movement and well-established implementation modalities for ALACs and NIS studies has been an important factor in the progress that has been achieved to date.

Capacity building provided by the TI-S has mostly been well-received, with some reservations regarding the Most Significant Change (MSC) training – some NCs are still uncertain as to the applicability of the methodology to their projects. However, while day-to-day support from programme staff, and regional and thematic staff has been substantial, capacity building events have been limited. This means that NCs have had a lot of individual
attention in implementing the programme (including visits by TI-S staff), but less in the way of AC:DC focused capacity building events.

While recognising that the logistics and expense of organising events across a portfolio of 23 countries are challenging, greater focus on AC:DC goals and priorities in the first half of the programme might have been achievable through a series of smaller cross-country exchange and learning events. This would not necessarily need to be by theme or region – mixing up the types of projects might generate some interesting dynamics and yield some interesting, unexpected lessons. The key objective, however, would be to build a sense of solidarity within the AC:DC ‘family’, and to demonstrate the role of different projects in contributing to the AC:DC’s common purpose.

4.3 Performance against log frame

This section provides an assessment against each of the log frame purpose and outputs based on a) the evaluation team’s qualitative assessment based on in-country observations; and b) aggregate portfolio performance against the log frame indicators (except for Output 1). Table 4.4 provides a summary overview, including in column 6 a log frame assessment (LFA) score which reflects performance against the log frame indicators and in column 2 the evaluation’s overall LFA which reflects both the qualitative and quantitative assessment.

While this section uses monitoring data provided by TI, it should be noted that measures of integration on the partnership, advocacy and policy scales (Figure 4.1, Figure 4.2 and Figure 4.3) are extremely provisional given that only three quarters of data are available for 2010, with consequences in skewing regional, thematic and portfolio averages.

4.3.1 Purpose: To promote evidence-based anti-corruption policy and practice by public and non-state actors

At country level

Currently, it is the ALACs within the AC:DC programme that are showing signs of being able to catalyse evidence-based anti-corruption policy and practice by public and non-state actors, but at limited scale. The cases are effective in demonstrating to citizens that recourse is possible in cases of corruption, building confidence in citizens to come forward and, in several different ways, contributing to increased transparency. This is potentially contributing to a behaviour change. Any demonstrable deterrent effect would also constitute behaviour change. However, the ALAC successes have very much been focused on the results of single cases, with few examples of this leading to wider direct benefits.

In Bosnia, the ALAC has successfully lobbied for the adoption of a national anti-corruption strategy, developed by TI-BiH together with OSF-BH, by the Council of Ministers, which has also agreed to the creation of an anti-corruption agency. This was achieved some six years after the ALAC was established. The next challenge, however, is to turn this outcome into real systemic and lasting change. While legislation is in place, the will to enforce and implement it is lacking. Corruption continues at all levels in society and the public sector and judiciary seem incapable of tackling corruption with any energy or conviction. There is a lack of political will to tackle corruption and TI-BiH has not yet succeeded in raising demand sufficiently to change the political climate.

In Zimbabwe, the emphasis is rather on the practice of petty corruption, at local or community level. Although the evaluation team did not come across documented examples, TI-Z has recorded instances of policy change at the level of ‘policy enforcement’ (5 on the policy scale). In this case, success in bringing about a change in practice is dependent on the will and capacity of relevant agencies to deal with cases brought to them by the ALAC. The Mayor of Harare has pledged his commitment to addressing cases of appropriation of market stalls; and the Office of the Prime Minister has agreed to intervene to investigate the practice of bribery in hospital maternity wards. At local level, AMCs report that they are having a deterrent effect, but it is difficult to measure this.

Other instances of policy change include Montenegro, where the ALAC has managed to push the government toward policy implementation in the areas of public procurement and
privatisation, in particular; and Liberia, where the ALAC has contributed to the passing of a Freedom of Information act and the implementation of a Whistle Blower Protection Executive Order (and is currently advocating for a Code of Conduct Bill).

One of the issues emerging from the reporting of ALAC impacts is the predominance of cases concerning individuals, meaning that the scale of benefits is very constrained (although there is clear utility in aggregating individual cases to point to systemic sector issues). One of the exceptions highlighted by TI is the Rwandan case (see box).

Rwanda: A gold mine’s rightful ownership restored

TI intervened on behalf of 60 members of a mining cooperative which had fraudulently been registered to the president of the cooperative. As a result, the cooperative’s president was sentenced to 10 years in jail, and fined US$3,400. Ownership of the mine was returned to the group, and TI Rwanda has since been approached with three more cases related to mine exploitation.

Elsewhere, the Montenegro ALAC successfully interceded on behalf of 70 striking miners to defend their terms of employment. And in Kenya, the Mombasa ALAC has established community monitoring of municipal expenditure which brought to light Ksh 2 million of unutilised funds; it has carried out a citizen’s report card survey in four districts which has resulted in the posting of a service charter, including fees, outside hospitals; and it has formed community level anti-corruption committees which have similarly succeeded in lobbying for the posting of hospital charges outside hospitals.

Of the non-ALAC projects, advocacy activities in Georgia will not be planned until the NIS has been finished in April 2011. And in Nicaragua, some survey work has been done; however, expectations of policy impact are currently capped by pending elections in November 2011.

At portfolio level

At portfolio level, the total number of policy changes recorded in Y3 was 82, an increase of 25 on 57 in Y2 (Table 4.1). The average degree of change increased from 2.22 to 2.5 (Figure 4.1).

Two policy changes resulted in ‘change in culture’ (6): a campaign to implement the nominal vote in the House of Representatives in Colombia and a campaign to achieve higher transparency in the Capitation Grant to Primary Schools in Ghana. There were six policy changes at level 5 (‘policy enforcement’) in Zimbabwe, Ghana and Kenya. Zimbabwe and Kenya also record the highest absolute change from level 1 (‘change in discourse’) in Y2 to level 5 (‘policy enforcement’) in Y3.

Table 4.1 Number of policy changes by theme (cumulative)

<table>
<thead>
<tr>
<th></th>
<th>Y2</th>
<th>Y3</th>
</tr>
</thead>
<tbody>
<tr>
<td>ALAC</td>
<td>40</td>
<td>69</td>
</tr>
<tr>
<td>Other</td>
<td>15</td>
<td>10</td>
</tr>
<tr>
<td>NIS</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Total</td>
<td>57</td>
<td>82</td>
</tr>
</tbody>
</table>

3 All data based on TI-S summary analysis of monitoring tool data. The data compares fiscal Y2, ie April 2009 to March 2010 with fiscal Y3, for which only three quarters of data had been received
4 Declines between Y2 and Y3 reflect the removal of Uruguay from the programme
4.3.2 Output 1: Strong knowledge and evidence base on anti-corruption issues

The quality of the research produced by TI is generally considered to be high, and the work that has gone into the NIS study in Georgia has been substantial, meticulous and very consultative. There is broad confidence that the report will be of a high standard. NIS reports for both Georgia and Armenia are significantly delayed, however there have been very good reasons for this (and the delay is perhaps less important given that both Georgia and Armenia were also expected to participate in the UNCAC review as part of the AC:DC programme, but there is still little certainty as to when the review will take place).

Of 21 NCs which returned the MTE survey questionnaire, eight had completed between one and 14 research outputs and seven had between one and four research outputs in draft. 33 research outputs had been disseminated by nine NCs (including TI-S publications).

The ALACs are also proving an effective means of building a powerful evidence base which is mapping the dimensions of corruption, albeit at local level. There are still some issues with the ALAC database: for instance, Zimbabwe has been underreporting in error, and Montenegro has a different system (dating back to before the existence of the ALAC database) for collecting and collating information. Nevertheless, it has clear potential as a tool for identifying priority corruption issues and helping ALACs to target their outreach strategies.

Currently, data is not being gathered on contacts received community representatives, the number of issues they are able to resolve within their communities, or the kind of issues they are dealing with that are not being referred to the ALAC. This is a missed opportunity to track valuable data –acknowledged by TI-Z, which currently does not have the resources to gather or manage data at community level. Going forward, it would be very useful to collect basic information where, as in Nepal, Pakistan, Rwanda, Zimbabwe and Kenya, community-level groups are working on behalf of the ALAC.

4.3.3 Output 2: NC demand for improved anti-corruption policies and practices

The NCs visited in Zimbabwe, Bosnia and Nicaragua are all engaged in campaigns at different levels to bring about improved anti-corruption policies and practices. At the smaller scale of an ALAC such as Zimbabwe’s, these tend to be opportunistic and responsive to information emerging out of the contacts and cases data. At the other end of the scale, in the case of Nicaragua, the AC:DC project focuses on a single agenda, and its main advocacy

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5 Georgia reported 14 research outputs, 13 of these being chapters of the NIS report
output has been a proposal for electoral reform and ‘minimum guarantees’ of democratic rights for citizens.

In Georgia, AC:DC advocacy activities will be identified and prioritised through the NIS workshop which will be held on completion of the research to disseminate the findings to stakeholders in Georgia. The emerging findings from the NIS are that the policy framework for anti-corruption in Georgia is very good, and that it is in terms of practice that Georgia performs less well. It is anticipated, therefore, that advocacy activities will focus on improving implementation of policy rather than on drafting new policy.

Perhaps a more meaningful indicator here would be a measure of citizen demand for improved anti-corruption policy and practice. The building of grassroots demand is very evident in the case of Zimbabwe, where the AMCs in particular are raising awareness and facilitating access to the ALAC for communities that would normally not have any channels for reporting corrupt activity. The work of the Nicaragua NC has focused on mobilising civil society capacity around electoral reform, and the creation of the electoral reform promoter group is a concrete output in this regard. TI BiH has also focused on raising awareness and has helped mobilise other NGOs.

At portfolio level

At portfolio level, the total number of advocacy campaigns recorded in Y3 was 157, an increase of 69 on 88 in Y2 (Table 4.2), representing an increase of 78 per cent and outstripping the 40 per cent target. The average stage of advocacy campaigns increased from 2.5 to 3.93 (Figure 4.2).

12 advocacy interventions were at level 6 (‘advocacy closed’), two in Argentina, two in Fiji, one in PNG, one in Bosnia, five in Colombia and one in Georgia. The greatest change from 1 in Y2 to 6 at the end of Y3 was observed with two advocacy interventions in Argentina.

Information is not currently being gathered on which NCs have prepared an advocacy strategy for the AC:DC programme. At the time of the baseline, eight had completed one, seven had partially completed one, four were awaiting completion and four were not planning one. However, the TI-S is not confident that advocacy strategies specific to the AC:DC programme have in fact been prepared: it is hoped that recent training for more strategic advocacy and more conscious campaign development, as well as the introduction of the advocacy scale, will help to address this.

<table>
<thead>
<tr>
<th>Table 4.2</th>
<th>Number of advocacy campaigns by theme (cumulative)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Y2</td>
</tr>
<tr>
<td>ALAC</td>
<td>72</td>
</tr>
<tr>
<td>Other</td>
<td>16</td>
</tr>
<tr>
<td>NIS</td>
<td>0</td>
</tr>
<tr>
<td>Total</td>
<td>88</td>
</tr>
</tbody>
</table>
4.3.4 Output 3: Public institutions and non-state actors engaged in the fight against corruption

The greatest absolute number of NC partnerships across the AC:DC programme is with government, rather than civil society, media or the private sector – although Y3 saw a decline in the number of partnerships with government while other partnerships increased. However, the data show that the level of involvement (degree of integration) is less in the case of government, and this is borne out by the evidence from the country visits, although it is not necessarily the case in other countries in Latin America or Africa and the Middle East. Partnerships are necessarily dynamic in nature and may be weaker at some times and with some agencies.

Of the NCs visited, Zimbabwe, Bosnia and Georgia all had established relationships with government at national and local level, although with different degrees of formality. Some countries (notably Bosnia and Rwanda) routinely sign MoU agreements with government partners, but this is not the case all countries. In Zimbabwe, partnerships are largely informal and opportunistic, although some good initiatives had been started such as the provision of training to the Department of Immigration.

In Nicaragua, the NC has established the electoral reform coalition with 14 NGOs. However, it has been unable to engage government in the work of the AC:DC project. Instead, the NC is now attempting to engage local government in its work – a strategy that has proven successful in other difficult circumstances in Latin America. It aims to provide training workshops organised by other members of the coalition.

**Table 4.3 Number of partnerships by theme (cumulative)**

<table>
<thead>
<tr>
<th>Theme</th>
<th>Y2</th>
<th>Y3</th>
</tr>
</thead>
<tbody>
<tr>
<td>ALACs</td>
<td></td>
<td></td>
</tr>
<tr>
<td>State Actors</td>
<td>155</td>
<td>219</td>
</tr>
<tr>
<td>NGO/CSO</td>
<td>87</td>
<td>127</td>
</tr>
<tr>
<td>Commercial</td>
<td>8</td>
<td>11</td>
</tr>
<tr>
<td>Media</td>
<td>24</td>
<td>30</td>
</tr>
<tr>
<td>Other</td>
<td>11</td>
<td>15</td>
</tr>
</tbody>
</table>
4.3.5 Output 4: Capacity of NCs and citizens to engage in and pursue anti-corruption activities

As described in Section 4.2.6 above, TI’s national chapters have demonstrated significant capacity in implementing AC:DC projects. Furthermore, capacity to engage in and pursue anti-corruption activities is being built through the activities of the AC:DC programme: the building of the evidence base strengthens NC capacity, and applying new methodologies such as the NIS has spill over effects in terms of research methodologies generally.

Section 4.2.3 has also noted the catalytic effect the ALACs are having in empowering citizens and communities in addressing corruption. This has several dimensions:

- Raising awareness of what corruption is and how it is manifested;
- Providing a recourse for reporting cases of corruption;
- Demonstrating that corruption can be challenged, and stopped – thereby reducing unwillingness to come forward to report cases;
- Potential deterrent effect.

Evidence of the extent to which the evidence-based advocacy component of the programme can build citizen capacity is, as yet, limited.

At portfolio level

The log frame indicators for Output 4 are:

4.1 Increase in number of male and female new cases opened year-on-year during lifetime of programme

4.2 Increase in % ALAC male and female clients surveyed that have increased awareness of their rights as a result of interaction with ALAC year-on-year during lifetime of programme

4.3 At least 80% of NCs implementing ALACS have developed a fundraising strategy by Year 3

4.4 80% of NCs pass the TI Members' Accreditation Review process during the life of the project

In terms of numbers of ALAC cases, this has seen a significant overall increase from 501 cases reported in 2009 to 1,373 in 2010. Nepal recorded an increase from 30 to 317 The number of cases reported by women rose far more slowly from 99 in 2009 to 132 in 2010; and the number reported by men rose from 345 in 2009 to 670 in 2010. Figures 4.4-4.6 show the breakdown by country, for all cases and for cases reported by women and men separately. The data shows that all countries have seen an increase in the number of cases being taken up; although cases known to be reported by women have declined in Argentina, Bosnia, Rwanda, Vanuatu and Zimbabwe.

Figure 4.4 Total cases* reported by country, 2009 and 2010

* Cases reported by men, women and where gender is not known

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6 Case data from 2009 and 2010 (calendar years) from: Argentina, Bosnia and Herzegovina, Fiji, Ghana, Kenya, Liberia, Nepal, Pakistan, Papua New Guinea, Rwanda, Vanuatu, and Zimbabwe. Montenegro is not included.
For indicator 4.2, the data is not currently being collected by the TI-S — although client satisfaction feedback forms are being completed, at least in Zimbabwe. Going forward, this would be very valuable information for addressing the evaluation’s concerns that the programme log frame does not adequately reflect on citizen demand and capacity.

With regard to fundraising strategies, nine out of 13 ALACs that participated in the MTE self-assessment said they had a fundraising strategy in place, 75 per cent compared with an 80 per cent target.

In terms of accreditation, seven countries (30 per cent) were reaccredited in 2010 with a further 11 due to be reaccredited in 2010-11, giving a total of 78 per cent.
### Table 4.4  Log frame assessment

<table>
<thead>
<tr>
<th>Logical Framework Matrix</th>
<th>Overall MTE LFA</th>
<th>Project Summary</th>
<th>Performance against indicators</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Purpose</td>
<td>3</td>
<td>A. To promote evidence-based anti-corruption policy and practice by public and non-state actors</td>
<td>A.1. Overall # of changes in policy and practice increased by 40% in comparison with Annual Report 2009</td>
<td>44%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>A.2. Increase in year-on-year overall average level of change in policy and practice in comparison with Annual Report 2010</td>
<td>0.28</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>A.3. Verifiable evidence of NC recommendations being implemented through policy reforms and observed changes in practices by public and non-state actors</td>
<td>✓</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>A.4. Return of UNCAC Check-lists increased from 44% to 60% by the end of the programme</td>
<td>na</td>
</tr>
<tr>
<td>Outputs/Results</td>
<td>1</td>
<td>1. Strong knowledge and evidence base on anti-corruption issues</td>
<td>1.1. 80% of foreseen reports produced, meeting quality standards of an external reviewer or the regional department</td>
<td>?</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1.2. 80% of research undertaken by NCs includes recommendations to decision makers</td>
<td>✓</td>
</tr>
<tr>
<td>Logical Framework Matrix</td>
<td>Overall MTE LFA</td>
<td>Project Summary</td>
<td>Performance against indicators</td>
<td>Comments</td>
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</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Indicator</td>
<td>Result</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>1.3. # of publications distributed (monitored only at national level)</td>
<td>33%</td>
</tr>
<tr>
<td>1</td>
<td>2</td>
<td>3</td>
<td>2. NC demand for improved anticorruption policies and practices</td>
<td>78%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2.1. # of advocacy interventions increased by 40% in comparison with Annual Report 2009 during the life of the programme</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2.2. Acceleration of year-on-year average progress of advocacy interventions in comparison with Annual Report 2010</td>
<td>na</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>2.3. At least 40% of NCs have developed a comprehensive advocacy plan for a component of their sub-project by Year 3</td>
<td>83%</td>
</tr>
<tr>
<td>2</td>
<td>3</td>
<td></td>
<td>3. Public institutions and non-state actors engaged in the fight against corruption</td>
<td>78%</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3.1. # of non-state actor partnerships increased by 40% in comparison with Annual Report 2009 during the lifetime of the programme</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>3.2. Increase in overall average level of coordination, collaboration &amp; integration of non-state actor partnerships in comparison with Annual Report 2010</td>
<td>×</td>
</tr>
</tbody>
</table>
### Logical Framework Matrix

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Result</th>
<th>LFA score</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.3. Average # of working relationships with the authorities increased from 6 (Annual Report 2009) to 8 by the end of the programme</td>
<td>x</td>
<td>3</td>
<td>Average per country not known, but there has been an overall decline to date</td>
</tr>
<tr>
<td>3.4. Increase in overall average level of coordination, collaboration &amp; integration of partnerships with public authorities in comparison with Annual Report 2010</td>
<td>?</td>
<td>4</td>
<td>TI-S Monitoring Tool analysis does not provide portfolio-level figures by partner type</td>
</tr>
<tr>
<td>3.5. % of regular and occasional participation by government in stakeholder engagement meetings increased by 20% by the end of the programme in comparison with Annual Report 2009</td>
<td>na</td>
<td></td>
<td>Data not currently captured at aggregate level (to be replaced by policy scale)</td>
</tr>
<tr>
<td>3.6. % of regular and occasional government invitations of NCs to reform consultations increased by 20% by the end of the programme in comparison with Annual Report 2009</td>
<td>na</td>
<td></td>
<td>Data not currently captured at aggregate level</td>
</tr>
<tr>
<td>3.7. Rate of regular and occasional response by government to NC enquiries increased by</td>
<td>na</td>
<td></td>
<td>Data not currently captured at aggregate level</td>
</tr>
</tbody>
</table>
### Logical Framework Matrix

<table>
<thead>
<tr>
<th>Indicator</th>
<th>Result</th>
<th>LFA score</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>20% by the end of the programme in comparison with Annual Report 2009</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. Capacity of NCs and citizens to engage in and pursue anti-corruption activities</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.1. Increase in # of MALE and FEMALE new cases opened year-on-year during lifetime of programme</td>
<td>Female: 99 cases opened in 2009 &amp; 132 in 2010 Male: 345 cases opened in 2009 &amp; 670 in 2010*</td>
<td>2</td>
<td>2010 vs 2009</td>
</tr>
<tr>
<td>4.2. Increase in % ALAC MALE and FEMALE clients surveyed that have increased awareness of their rights as a result of interaction with ALAC year-on-year during lifetime of programme</td>
<td>na</td>
<td></td>
<td>Data currently not collected by TI-S</td>
</tr>
<tr>
<td>4.3. At least 80% of NCs implementing ALACS have developed a fundraising strategy by Year 3</td>
<td>75%</td>
<td>1</td>
<td>Based on questionnaires returned, 9 out of 13 currently have a fundraising strategy</td>
</tr>
<tr>
<td>4.4. 80% of NCs pass the TI Members' Accreditation Review process during the life of the project</td>
<td>30%</td>
<td>1</td>
<td>2010 7 countries reaccredited in 2010 11 due to be reaccredited in 2010-11</td>
</tr>
</tbody>
</table>

**Log frame assessment key:** 1. = Likely to be completely achieved, i.e. well on the way to completion (or completed); 2. = Likely to be largely achieved, i.e. good progress made; 3. = Likely to be partly achieved, i.e. partial progress made; 4. = Only likely to be achieved to a very limited extent; 5. = Unlikely to be achieved * Case data from calendar 2009 and 2010 from: Argentina, Bosnia and Herzegovina, Fiji, Ghana, Kenya, Liberia, Nepal, Pakistan, Papua New Guinea, Rwanda, Vanuatu, and Zimbabwe
**4.4 Impact: Making a difference in the lives of citizens and communities**

The AC:DC log frame purpose sets out the anticipated impact of the programme: *to promote evidence-based anti-corruption policy and practice by public and non-state actors.*

This section provides an assessment of the extent to which the AC:DC programme has been able to deliver this anticipated impact. It should be noted, however, that the assessment is qualified by the limited ability to attribute impact to AC:DC funding. This primarily reflects the new ALACs which have received only seed funding from the AC:DC programme and have had to raise cofunding from other donors in order to continue the operation and activities of the ALAC. The assessment, therefore, primarily describes the AC:DC’s contribution to impact rather than attributing impact to the AC:DC.

**4.4.1 Direct, ‘on-the-ground’ impacts**

That said, the AC:DC funding has had a clear, direct impact in terms of having established ALACs which are making a difference in the lives of some victims and witnesses of corruption. Of the projects in the AC:DC portfolio, this is the most visible impact to date. Citizens have a greater awareness of corruption issues, and the work of the ALACs is demonstrating that if they take a stand against corruption there are channels for redress and that, through their actions, the perpetrators of corruption can be called to account. This is important in building citizen capacity for addressing corruption – both in terms of their awareness and their willingness to report corruption.

In contexts in which the anti-corruption policy framework is reasonably good, this demand-side strengthening is an important incentive for bringing about more effective implementation and enforcement of anti-corruption policy. Several reported successes have been a matter of enforcement of existing rules, for example:

- **Zimbabwe** A small trader reported a client who had failed to pay for his goods to the police, but no case was opened against him. Suspecting that a bribe had been paid, he went to the ALAC which analysed the case and helped the trader to draft an official complaint against the detective in question. The detective was ordered to arrest the client or else be suspended from work. The following day the client was brought before the court and a trial date was set. In the meantime, the detective faces disciplinary measures by the police head office.

- **Ghana** After the government increased road tolls, toll booth attendants began taking lower fees from drivers and pocketing the money themselves. When this was reported to the ALAC, its staff informed the Serious Fraud Office and the Ministry of Roads and Highways which has established a task force to carry out an investigation and plans to automate all toll collection points.

- **Bosnia** The suspicions of the ALAC in Bosnia were raised by a job advertisement placed by the Bosnia and Herzegovina Mine Action Centre, which runs entirely on government funding, for a position requiring a degree in music. After TI-BiH received an unsatisfactory response from the centre to its request for clarification of its hiring procedures, TI-BiH decided to publicise the case, which was subsequently picked up by civil society organisations and media outlets, and received widespread radio and internet coverage. The following day the centre called off the recruitment process.

- **Ghana** Lecturers at a polytechnic started charging students fees for class handouts. In return, they were promised a 20 per cent uplift in their end of year grade. When the ALAC took this to the school board, an internal investigation was carried out, the lecturers confessed and the school resolved to provide all class materials free of charge or at affordable prices.

By 2010, across the portfolio, 341 cases had been successfully closed out of a total of 1,374 (25 per cent).

The cases are typical in that they involve an individual or small group of victims. None of the ALACs are currently working at significant scale. The numbers of contacts and cases seem...
low in some countries: (particularly Zimbabwe). Some ALACs are very constrained in the number of cases they are able to take on by the number of staff. The ALAC in Vanuatu, for instance, with three staff, has been overwhelmed by demand since the day it opened.

In Zimbabwe there were some anecdotal reports that the ALAC and AMCs were having a deterrent effect – it would be useful to be able to document this if possible.

4.4.2 Policy impact

Of the countries visited, there is clear evidence of policy impact in Bosnia, with the introduction of the anti-corruption law in 2009, and to a lesser extent in Georgia, where TI and the NIS team were consulted on development of the anti-corruption strategy (with partial reflection of TI recommendations).

Evidence of policy impact currently is, therefore, limited; and this is borne out by the numbers being reported through the AC:DC monitoring tool. Although 82 policy impacts to December 2010 have been reported, it should be noted that these impacts may be anywhere along the scale from ‘change in discourse’ (1) to ‘change in culture’ (6). The view of the evaluation team is that clear evidence of impact is reflected in a score of 3 and higher, which indicates policy adoption. The average score in Y3 is 2.5, compared with 2.22 in Y2 (2 indicates ‘policy development’ and 3 indicates ‘policy adoption’).

It should be noted that TI’s view is that all achievements along the policy scale, from change in discourse, constitute policy impact. The evaluation team finds this definition stretched. It was also pointed out that the level of achievement of a policy change is context specific. That is, what might be considered little impact in one context (eg mentioning of corruption in the electoral programme or by government officials) can be considered a major achievement in another (in some western countries a change in discourse is not considered as enough).

Of these, 69 were achieved through ALAC projects, three through NIS projects and 10 through other projects. Good examples include Montenegro where the ALAC has managed to push the government toward policy implementation in the areas of public procurement and privatisation, in particular; and Liberia, where the ALAC has contributed to the passing of a Freedom of Information act and the implementation of a Whistle Blower Protection Executive Order (and is currently advocating for a Code of Conduct Bill). Common themes include public procurement, freedom of information legislation and whistle blower protection.

4.4.3 Impact on practice

The examples of direct, on-the-ground impact by ALACs given above illustrate the extent to which, currently, the AC:DC programme is able to bring about change in anti-corruption practice. Direct impact is mostly restricted to individual cases or small groups. Additionally, where, for instance, illegal tolls or charges are being raised, resolution benefits a wider group. The most significant scale reported to date has been in the case of the Rwandan mining cooperative; and in Montenegro where, building on eight years of experience, the ALAC successfully interceded on behalf of 70 striking miners.

Indirect impacts include, for instance, greater confidence in reporting corruption and the building of citizen demand for greater transparency. As indicated above, there is the suggestion that the ALACs have an important deterrent effect, but this cannot be verified.

The bottom-up, small-scale impacts being delivered by the ALACs are complemented by the top-down impacts sought through advocacy campaigns and efforts to bring about policy change. Of the policy impacts reported through the monitoring tool, two have resulted in ‘change in culture’: a campaign to implement the nominal vote in the House of Representatives in Colombia and a campaign to achieve higher transparency in the Capitation Grant to Primary Schools in Ghana.

7 Defined as ‘Alteration of way targeted representatives communicate verbally or in writing on the topic’. Indicative activities include verbal support for proposed changes and changes in written documents, but not at sufficient level to alter direction of policy.
However, the example of Bosnia illustrates the wider challenge of moving from change in policy to change in practice: while policy change has been successfully introduced and legislation is in place, the will to enforce and implement it is lacking. Consequently, new policies go unheeded and the practice of corruption is unchanged. The inability to bring about systemic change in practice similarly frustrates the efforts of the ALAC in Zimbabwe where cases reported by the ALAC to the authorities come to trial but the trial itself is subject to untransparent practices and alleged perpetrators of corruption are released.

Clearly, the objective of bringing about change in practice is an ambitious, long-term project and it is not necessarily expected that the programme should at mid term be able to demonstrate evidence of this. Rather, as highlighted below, evidence of strategic approaches for building towards this purpose-level objective serves as an indicator of the likelihood of delivering on the purpose.

A ‘politically conscious’ approach to change in practice

It is perhaps a reflection of the present stage of implementation of the AC:DC programme that there is a broad emphasis currently on policy change and less emphasis on bringing about change in practice – the kind of behavioural, attitudinal or institutional change that will make a lasting difference in the lives of citizens. Such changes will take far longer than the five-year span of the AC:DC programme (as Bosnia and Montenegro are finding). Nevertheless, there is an opportunity as NCs draft or refine their advocacy strategies – especially where they build on the work of an NIS – to introduce a politically conscious approach to identifying change drivers, incentives for improved accountability and differential approaches to advocating for change in both policy and practice.

This kind of analysis, strategy and plan for bringing about change should help to secure more effective outcomes. For instance, although traction with government in Georgia is currently limited, its policy focus on attracting FDI and consequent sensitivity to performance in international rankings provide a clear pressure point. In this case, working to build in-country demand may be less effective than bringing to bear the moral suasion of the international community and highlighting risks to Georgia’s international reputation if it fails to improve its performance on anti-corruption. Indeed, TI-Georgia has since taken precisely this approach to its advocacy planning in the initial drafting of its advocacy plan, on the results of the NIS study (as part of the advocacy training held in Berlin at the end of March 2011).

This kind of analysis should inform decisions over the mechanisms and channels for advocacy, potential entry points, whether advocacy should be carried out after the building of the evidence base has been completed, or whether it makes more sense to begin advocacy activities concurrently. It should shed light on the balance of effort required which focuses on the supply side of accountability (primarily government institutions) and the demand side, where the NCs are traditionally stronger. It calls for a sophisticated approach to advocating for change, and probably involves a role for the TI-S in providing training and expertise in political economy analysis.

The approach should provide greater clarity upfront over how the change is expected to be achieved, and will help to flag the risk of deviating from or falling behind plan and identify remedial actions.

4.4.4 Likely impact: Development of the evidence base

Research and data gathering activities provide the evidence base for advocating for change in policy and practice by:

1. Drawing attention to individual cases of corruption;
2. Identifying policy issues and priorities;
3. Highlighting gaps in policy;
4. Informing policy formulation;
5. Monitoring implementation and enforcement of policy.

The data emerging from the ALACs is currently primarily addressing (1) and (2). As the analysis above indicates, the ALAC evidence base is being used to advocate for local level
and small scale change in practice. Examples of the information being used to inform a policy stance (rather than a single issue campaign) are fairly limited, although Zimbabwe’s work on the gender dimensions of corruption is a good example.

The NIS covers a broad range, from (2) to (5). It is a comprehensive piece of work which is expected to inform the agenda of the NC as well as identifying specific issues for advocacy. While the data emerging from the ALACs is very ‘action oriented’, the risk with the NIS is that it will be acknowledged as a good piece of work which is then left on the shelf, as was the case with Georgia’s previous NIS. In Georgia currently the ability to build on the findings of the NIS will, to a considerable extent, depend on the interest and will of government, which appeared somewhat lukewarm pending the results of the study. Although government is represented on the NIS advisory group, their involvement has been limited so far and the group has not been able to meet more than once. A lukewarm response by government could undermine TI-G’s ability to translate the work into advocacy and policy change. The opening of a new ALAC in Georgia might provide further stimulus to action by government.

The Nicaragua project addresses (3) and (4), having from the outset identified political finance and electoral reform as its focus. So far, the project has carried out national surveys on the perception of electoral practices; and monitoring of campaign funds and a Crinis study were originally planned.

At mid term, therefore, the ALAC and NIS projects have made good progress on building the evidence base which is expected to lead to change in policy and practice. As long as advocacy is well planned and ‘politically consciously’ implemented, and resources are adequate, there is a good likelihood of an acceleration in positive impacts emerging from the programme.

4.5 Efficiency and value for money

Based on the set of factors identified below, the evaluation’s conclusion is that the AC:DC programme is providing good value for money. A clearer view of value for money may be possible through comparisons with similar programmes although this is beyond the remit of this evaluation. Indicators could be costs per beneficiary, salary levels, and headquarter/secretariat costs.

Within the programme, it appears that the ALACs outperform other components in terms of providing visible impact for a budget that is still fairly small. Key drivers of value for money have been the ability of the ALACs to attract further funding on top of the AC:DC grant; and the fact that ALACs and the NIS studies draw on TI’s broader and longer-term institutional knowledge and experience of implementing these projects.

Table 4.5 provides an overview of the four NCs visited, the total funding provided to them under the AC:DC funding, the amount spent to the end of 2010, and what has been delivered for that money.

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8 The Crinis methodology evaluates the levels of transparency built into current legislation and political financing practices of political parties and candidates during election campaigns, as well as the financial activities of parties in non-election years, thereby detecting weaknesses and strengths in a given country’s system.
Table 4.5  Overview of funding and outputs/results to date

<table>
<thead>
<tr>
<th>Country &amp; start date*</th>
<th>Total AC:DC grant (£)</th>
<th>Expenditure to end 2010 (£)</th>
<th>Rate of expenditure</th>
<th>Outputs/results to date</th>
</tr>
</thead>
</table>
| Bosnia Y1 Q3         | 148,691               | 69,091                      | 46%                 | • Average 850 contacts pa and 150 cases  
|                      |                       |                             |                     | • Adoption of anti-corruption strategy  
|                      |                       |                             |                     | • Agreement for anti-corruption agency  
|                      |                       |                             |                     | • Major legislative amendments agreed  
|                      |                       |                             |                     | • Media and publicity campaigns         |
| Georgia Y2 Q1        | 122,842               | 66,649                      | 54%                 | • 13 draft chapters  
|                      |                       |                             |                     | • Advisory Group constituted  
|                      |                       |                             |                     | • FoI test completed                   |
| Nicaragua Y2 Q2      | 128,732               | 39,386                      | 31%                 | • Promoter Group established and functioning  
|                      |                       |                             |                     | • Development of an Electoral Reform Proposal  
|                      |                       |                             |                     | • Publicity campaigns (radio advertising, roadshows, press conferences, press releases) |
| Zimbabwe Y1 Q3       | 155,670               | 90,778                      | 58%                 | • ALAC established & staffed†  
|                      |                       |                             |                     | • AMCs created & trained  
|                      |                       |                             |                     | • Publicity (advertising, roadshows, mobile clinics)  
|                      |                       |                             |                     | • Delivery of training to government    |

* Y1 Q3 = Mar quarter 2008; Y2 Q1 = Sep quarter 2009; Y2 Q2 = Dec quarter 2009. † Principal output funded by AC:DC

The overview suggests value for money in terms of:
- the volume of contacts and cases in Bosnia,
- delivery of policy impact in Bosnia,
- size and comprehensiveness of the research in Georgia,
- civil society mobilisation in Nicaragua (lower level output reflects lower rate of expenditure to date),
- catalytic effect of seed funding in Zimbabwe.

The evaluation team has considered possible qualitative and quantitative indicators of value for money. Based on the information and data currently available, the following are considered useful and measurable:

**Qualitative**
- alignment with GTF priorities (as set out in GTF log frame)
- ability to draw on existing institutional capacity and technical support

**Quantitative**
- volume of additional or follow-on funding to the project relative to AC:DC investment

As discussed in Section 3.1, the evaluation team’s assessment is that the AC:DC programme is well aligned with GTF priorities in terms of its goal of more capable, accountable and responsive government; and it responds directly to Output 6 of the GTF log frame: ‘Accountability – Strengthened CSOs’ engagement in the fight against corruption’. It is also relevant to Outputs 4 and 7. Where it falls somewhat short of the GTF’s intention is in the emphasis of the AC:DC log frame on building NC capacity to hold governments to account, rather than building citizen capacity. In practice, this is being achieved by the
ALACs – but is not being monitored. The ALAC pillar of the AC:DC programme is therefore better aligned to the GTF than the non-ALAC projects.

The AC:DC programme also provides value for money in its ability to draw on – at marginal cost – the breadth of experience available within the TI movement, and particularly within the TI-S, as well as its several years of experience in developing the ALAC and NIS concepts and methodology. Consequently, the programme benefits from the ongoing development and refinement of the NIS methodology (the AC:DC NIS studies belong to a second generation methodology); as well as ongoing work to develop the ALAC model, specifically in terms of developing the ALAC database (also second generation) and the recent development of an ALAC capacity assessment tool. They are also able to participate in events funded primarily through other budget lines: for example, AC:DC ALACs were able to participate in a global ALAC workshop and benefit from the lessons being shared there. It is unlikely that a similar event for the AC:DC ALACs could have been funded from the AC:DC grant alone.

In terms of leveraging additional or follow-on funding, the four projects visited have performed very well, raising up to five times the amount of the original AC:DC grant. The figures are illustrative only, and not comparable across countries. In Georgia, the additional funding represents the size of a recently awarded grant for a project which will use the NIS methodology. In Zimbabwe the additional funding shown is the sum of additional donor funding to the ALAC for 2010 only. In Bosnia, the figure shows total additional funding to the ALAC in 2009 and 2010.

Table 4.6  Additional funds levered through AC:DC grant (GBP)

<table>
<thead>
<tr>
<th>NC</th>
<th>AC:DC grant 2008-13</th>
<th>Additional funding</th>
<th>Additional funding vs original grant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bosnia</td>
<td>148,691</td>
<td>214,236</td>
<td>1.44</td>
</tr>
<tr>
<td>Georgia</td>
<td>122,842</td>
<td>614,846</td>
<td>5.01</td>
</tr>
<tr>
<td>Nicaragua</td>
<td>128,732</td>
<td>Separate donor funding for 14 NGOs to participate in Promoter Group</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>120,000</td>
<td>0.93</td>
</tr>
<tr>
<td>Zimbabwe</td>
<td>155,670</td>
<td>196,800</td>
<td>1.26</td>
</tr>
</tbody>
</table>

Other examples include support by AusAID for awareness raising by the ALAC in PNG (EUR22,500 in 2009 and EUR26,350 in 2010). Rwanda has secured additional funding for its ALAC in Kigali from Norwegian Peoples Aid and GTZ; and funding from the EC will support the creation of a further four ALACs outside Kigali.

Beyond these, key tests of value for money might include the extent to which AC:DC funded activities have been able to raise awareness. Public opinion surveys such as the Prism survey carried out in Bosnia, which showed that 52 per cent of citizens know of the ALAC, provide a good indicator, which could be expressed in terms of awareness levels per dollar spent. Such surveys may not, however, be cost effective, in which case the size (and, where possible, composition) of the audience reached through AC:DC related outreach exercises might serve as a proxy.

While the overall assessment is that there is value for money at portfolio level, the project in Nicaragua raises a concern. It is not clear to what extent it aligns with the AC:DC objectives, particularly the log frame goal. Expectations of what can be achieved by the coalition appear to be capped in anticipation of elections in November 2011, engagement with government is missing, and any immediate prospects for electoral reform and reform of political financing are reported to be limited. It has succeeded in mobilising civil society to advocate for change,
and the group’s ability to exploit the windows of opportunity that may open up during and after the election period will be critical to demonstrating value for money.

The cases of Ethiopia and Venezuela, where it has become impossible for the TI-S to continue providing financial support, have been addressed and these projects will no longer be receiving AC:DC funding. Nevertheless, Ethiopia will complete its NIS study and continue with local funding, and the project in Venezuela is reported to have performed well.

For the remaining project of concern, in Chile, the mid-term evaluation would appear to be an appropriate point (unless it is due to close in the near future) at which to take stock and assess whether the project will realistically be able to deliver its planned outputs and/or whether the AC:DC project is currently a burden on the NC given its other, more pressing issues.

4.5.2 Programme management

The value for money provided by the TI-S remains an open question in view of the high share of the budget (28 per cent) that is spent in Berlin. GTF guidance was that 85 per cent of the programme should be spent by local partners, and it would have been good to see larger budgets going to the NCs, especially the ALACs, which each receive a very small amount in view of the five-year duration of the programme.

The AC:DC programme was originally approved with a 23 per cent allocation to the TI-S, divided between pure programme management costs, and costs for support to NCs. Since the start of the programme, the ratio of TI-S costs to in-country costs has increased due to the disaccreditation of two NCs and the related removal of four projects from the programme, reducing the volume of funds being transferred to NCs. The weakening of the GBP against the EUR has also had a significant impact in terms of raising salary costs for the programme, although efforts have been made to adjust the allocation of TI-S staff time down accordingly.

Of the current 28 per cent share of the budget allocated to the TI-S, 14 per cent relates to pure programme management and M&E costs; a further 13.7 per cent is allocated to technical support and capacity development for the chapters. This relates primarily to inputs by regional and thematic staff at the TI-S, with a large portion of regional coordinators’ salaries covered by the programme. (There is a separate line, accounted for under NC costs, for capacity development. This amounts to nearly £200,000 over the five years of the programme.)

Current expenditure forecasts anticipate that by the end of fiscal 2010, programme management costs will be 11 per cent rather than 14 per cent.

Clearly the TI model of implementation differs from that of a traditional DFID-funded programme, which would work through a fairly lean programme management team in the interests of maximising available budget for in-country spending, and local level decision making. Nevertheless, in view of the substantial value added provided by the TI-S (see Section 4.1 above), and the very positive view of the TI-S within the NCs, this appears to represent value for money.

The evaluation’s concern is that, although NCs are autonomous, the discretion of the TI-S over such a large portion of the budget has implications for principles of aid effectiveness in terms of ownership and alignment.

It might be helpful if, going forward, the TI-S could provide greater clarity over what is to be provided in terms of capacity development, both from the dedicated capacity development budget as well as from the TI-S budget, over and above the daily support provided by regional and thematic teams. This would help to provide transparency for the NCs with regard to what support they can expect to receive over the second half of the programme, beyond the day-to-day.

The NCs have requested more capacity building – and particularly opportunities for lesson sharing. Initial AC:DC training took place in Berlin and some of the AC:DC countries in 2009, covering M&E, log frames and advocacy. ALACs and NIS teams have had specific training, both in Berlin and through visits from the TI-S, and there has been a global ALAC workshop
(to which the AC:DC contributed funds). ALACs have also benefited from an initial introduction in Guatemala, Zambia and Azerbaijan; as well as an early meeting of GTF grantees in Zimbabwe. MSC training was provided for eight NCs in Berlin in September 2010; and evidence-based advocacy training took place in Berlin at the end of March 2011. For some NCs, this has meant they have had the opportunity to attend only one such event.

In the absence of live events, the AC:DC bulletin prepared by the TI-S does an excellent job of pulling together results and lessons and sharing them across the programme. Other internet-based initiatives have been trialled and are being developed. However, there is NC demand for more interactive debate and discussion.

4.6 Sustainability

The issue of sustainability is concerned with the extent to which the models applied, the practice learnt and the benefits gained sustain beyond the life of the programme. The non-ALAC projects are all planned to complete within the term of the AC:DC funding; here, the question is whether their outputs will sustain – in terms of evidence found and advocacy campaigns and partnerships.

The ALACs within the AC:DC programme suffer from the usual risks to sustainability from project-based funding and a shortage of core funds. In Zimbabwe, the ALAC is facing short-term unpredictability as one round of funding comes to an end. That said, over the longer term the momentum and demand for ALACs is good and popular among donors. As described above, local fund-raising efforts have been very successful and the likelihood is that the ALACs will continue to be funded, even if visibility continues to be short-term. Of course, this may not be the case in all countries; and the disadvantage is that long-term planning is made difficult.

Sustainability is underpinned by the strong capacity of NC and ALAC staff in the countries visited for the evaluation. Indeed, the risk is that staff who are well respected will be recruited by other organisations which are able to pay higher salaries. Turnover has been an issue for some of the ALACs. In some contexts this is compounded by personal security risks attached to working for the ALAC and/or TI.

Ownership of the ALAC concept is also strong, with each chapter tailoring the work of the ALAC to the local context. In the past, where ALAC activities have had to be suspended due to lack of funds, ownership has been sustained and the ALAC reopened once new funding could be found.
5 The AC:DC logical framework

The objective and purpose of the AC:DC programme are defined in the programme log frame, last revised in February 2010. Figure 5.1 provides a graphic summary of the log frame components.

Figure 5.1 AC:DC programme log frame

<table>
<thead>
<tr>
<th>GOAL</th>
<th>To improve standards of governance, levels of transparency and reduce corruption in 25 countries</th>
</tr>
</thead>
<tbody>
<tr>
<td>PURPOSE</td>
<td>To promote evidence-based anti-corruption policy and practice by public and non-state actors</td>
</tr>
<tr>
<td>OUTPUTS/RESULTS</td>
<td>1. Strong knowledge and evidence base on anti-corruption issues 2. NC demand for improved anti-corruption policies and practices 3. Public institutions and non-state actors engaged in the fight against corruption 4. Capacity of NCs and citizens to engage in and pursue anti-corruption activities</td>
</tr>
</tbody>
</table>

The log frame provides a clear statement of the programme goal, purpose and outputs, which is relevant to the activities being implemented at NC level. The NCs visited for the evaluation demonstrated a good understanding of the purpose of achieving change in government policy. This is at least in part attributable to regular communications and initiatives from the TI-S which have contained a strong and consistently clear message about the emphasis on change as the focus of the AC:DC programme. The development of a monitoring tool to measure the number and depth of partnerships, advocacy and policy change has been very effective in underscoring this message.

In terms of defining the objectives and purpose of the programme, therefore, the log frame is adequately serving the programme and NCs. However, the evaluation team’s analysis has identified two particular issues:

- **Establishing the logic** The link from output/result to purpose level is something of a leap, and it is not evident how the outputs will deliver the purpose. This is to some extent a consequence of an ambitious purpose and somewhat unambitious outputs (see below). Furthermore, the log frame has not been developed below output level: although the components of the programme are shown, their activities are not detailed so their expected contribution to delivering programme outputs is not explained.

- **Ambitious purpose but unambitious outputs** The purpose-level objective, of bringing about evidence-based anti-corruption policy and practice by public and non-state actors appears ambitious in the context of the available resources and timeframe – particularly in terms of the expectation of achieving change in practice. In particular, the purpose appears beyond the combined achievement of limited log frame outputs. Some of the outputs are partially (Output 4) or wholly (Output 2) internally focused, aiming for increased demand and capacity within national chapters. This internal focus weakens...
the logic model (in terms of how outputs are expected to deliver the purpose). The evaluation team would have liked to see a ‘demand’ output expressed in terms of (external) citizen or civil society demand, with NC demand and capacity serving as a means rather than an end. This is recognised in the evaluation ToR, which asks for an assessment of empowerment of citizens and communities.

As log frame indicators are not time bound, the log frame does not indicate what was to be expected of the programme at mid-term. The MTE has made some assumptions, based on the results chain developed as part of the methodology.

5.1.2 Log frame indicators: some innovative tools for performance measurement

The mix of methodologies for monitoring the AC:DC programme is impressive in that it offers a holistic approach balancing quantitative methods with the more qualitative Most Significant Change methodology, and provides tools for measuring the less tangible dimensions of partnership, advocacy and policy.

Quantitative methods

The evaluation team has collated the data available in attempting to measure the performance of the AC:DC programme against the log frame indicators. In Section 4, Table 4.4 shows how the programme has performed against these indicators, and provides a log frame assessment score (column 6) to reflect that performance. The comparison with the evaluation’s overall LFA, in column 2, which takes into account the evaluation team’s qualitative observations as well as the results of the quantitative assessment, illustrates the extent to which the indicators currently reflect performance.

Although in some instances the indicators have been found to be somewhat narrow, they would be expected to be illustrative rather than comprehensive. The evaluation has found them to be broadly relevant – particularly those indicators relating to the monitoring tool (see below). The table highlights a number of areas for further work or improvement:

- **Incomplete data** Not all the data indicated in the log frame indicators is currently being collected (e.g., data from ALAC client feedback forms). Some data is being collected, but is not being presented to enable measurement. For instance, for a number of indicators the log frame identifies Annual Reports as the source. However, the two Annual Reports prepared so far have not consistently and comprehensively presented this data.

- **Internal focus** The internal focus at output level is also present in the indicators for Outputs 1, 2 and 3. The emphasis on NC deliverables could be balanced by some more external indicators (while recognising that these will be less in the control of TI). For instance, the indicators for Output 3 primarily relate to public sector and civil society engagement with TI’s work against corruption.

- **Scope** Indicators for Output 4 relate primarily to ALAC activities, with no indicator for citizen capacity in the non-ALAC countries.

The TI monitoring tool: Measuring partnership, advocacy and policy change

These details aside, the AC:DC programme has invested considerable effort in developing an impressive set of indicators to measure more difficult and less tangible results. Although a baseline was developed, it has been largely overtaken by the development of the monitoring tool which aims to measure the level and depth of partnerships, advocacy and policy change. The tool provides a user-friendly database for NGOs to input data regarding the number (level) of partnerships, advocacy campaigns and policy changes as well as the degree of the partnership, the stage of the advocacy campaign and the extent of the policy change (the depth). The ‘depth’ dimension is shown on a simple scale (Figure 5.2).
The evaluation's reading of the scales, and subsequent discussion with the TI-S, has highlighted not only their usefulness but also the extent to which they may be open to misinterpretation, especially when used as performance indicators in the log frame. Some care therefore needs to be taken in the presentation of results. It may be useful for the scales to be graduated to reflect ambition and represent what is achievable. This was a clear problem with the policy scale, where ‘change in culture’ is not always a realistic ambition. And it needs to be explicitly stated that the partnership scale is, in fact, not intended as a progression.

By December 2010, 18 countries had completed the monitoring tool (with data for four quarters available). Currently, however, the data emerging from the tool is of variable quality. Evidence from actual monitoring tool submissions (from September 2010) suggests that some NCs were not inputting data correctly, and that there is still some work to be done in rolling out the monitoring tool and training NCs in its use. For these reasons, the evaluation has had only limited confidence in its usefulness for cross-programme aggregation (over time) or comparison.

However, it has clear potential to capture progress on difficult-to-measure dimensions, with a simple, effective scale which is of value not only for M&E purposes, but also for donor reporting and fund raising. Furthermore, it is relevant to the body of TI’s work, not just the AC:DC programme, with external interest from other GTF grant holders.

Most Significant Change: Limited traction

The other innovation within the AC:DC programme has been to introduce Most Significant Change methodology as a means of reporting on impact. This is a relatively recent development and, while promising, has yet to show signs of traction. MSC training was provided to eight participating NCs towards the end of 2010, however at the time of the MTE it was not clear that NCs had embraced or fully understood the methodology and it was difficult to get MSC stories out of them. From the available progress reports, only Kenya, Rwanda, Montenegro and Vanuatu have submitted stories. Pakistan had also submitted stories.

In the case of the ALACs, it is not clear that there is sufficient understanding of the difference between MSC stories and the ‘human interest’ stories that they are more used to preparing. And for the NIS, it was not apparent how MSC methodology could be implemented especially before completion of the research and the start of advocacy activities.

5.1.3 Country-level log frames

Given the diversity of the projects in the AC:DC portfolio, the programme log frame is perhaps less useful than the project level log frames which provide the opportunity to more...
tangibly capture the final and intermediate results and outcomes that can realistically be expected within the parameters of budget and time.

While NCs in the countries visited acknowledged the log frame to be a useful tool (the ability to report on results and impact helps local fundraising efforts), there was varying evidence of the extent to which they are being applied or referred to. Zimbabwe and Bosnia each have a log frame based on the template ALAC log frame developed by the TI-S (Bosnia has added an output). Georgia’s log frame is similarly based on the template NIS log frame developed by the TI-S, with tailored indicators. Nicaragua developed its own, project-specific log frame.

The project log frames appeared to be of limited relevance to the day-to-day activities of implementation. So while awareness of the overall goal and purpose of the programme was maintained by regular communications from the TI-S, there was a less clear focus on how project activities were expected to deliver the purpose. In Bosnia, there was a clear focus on using the evidence from the ALACs and an earlier NIS study to focus advocacy efforts in concert with other NGOs and the media. But this is not the case elsewhere and the transformative advocacy component – to use the evidence base to promote change – remains, in some cases, something of a black box, with advocacy activities and their expected outcomes undefined.


6 Achievements, challenges and lessons

Key Evaluation Question
What has gone well? What has gone badly and why?

This section builds on the observations of the previous sections to pull out some of the key lessons from the ACDC programme, in terms of achievements and challenges, which could support more effective implementation over the second half.

6.1 Achievements and innovations

The top-line achievements and innovations of the AC:DC programme have been:

- The successful launch of ALACs in 12 countries – with, in some cases (Vanuatu), more success than they could handle;
- Successful cases at community level in Fiji, Rwanda and Montenegro;
- Some important successes in advocacy and bringing about new policies in Liberia and Bosnia;
- The innovation of community level outreach and monitoring groups to extend the work of the ALACs in Nepal, Fiji, Pakistan, Rwanda, Zimbabwe and Kenya;
- Development of an evidence base in many of the countries from which it will be possible to plan advocacy campaigns and provide a platform for action;
- Building partnerships/coalitions with other CSOs that share a similar outlook. These are of variable depth but in certain instances, for example Bosnia, they have acted as a multiplier of demand for greater accountability by state institutions;
- Effective management of a large, ambitious programme in which NCs all feel well supported;
- The innovation of the partnership, advocacy and policy scales which have the potential to serve as an incentive as well as a monitoring tool.

The achievements and innovations point to the following set of positive lessons.

ALAC demand: Responding to a broad set of needs builds trust

The ALAC concept is sufficiently flexible to be relevant in a diverse range of contexts. In the new ALAC countries under the AC:DC programme, the ALACs have largely conformed to the basic model, although their work programmes have been defined by demand and local need. Expectations have been high: in one country at least, the ALAC has been overwhelmed by demand, and in a number of countries expectations of the ALAC have been broader than its anti-corruption, non-investigative mandate. The stories that have emerged from the ALACs indicate that even among the cases that are taken up, several of them are not strictly issues of corruption but relate instead to, for instance, human rights abuses or broad issues of transparency. Yet clients are not turned away. Where they cannot be helped by the ALAC, they are invariably referred on. This openness to a broad demand is playing an important role in building trust in contexts in which there are significant disincentives for victims and witnesses of corruption to come forward.

A grassroots presence extends outreach through trusted individuals, and improves access and demand

The use of existing social capital at community level has proven an effective means of extending the ALAC’s outreach and building trust, particularly in terms of providing access for vulnerable and marginalised communities and individuals. In Zimbabwe, the ALAC is working through trusted individuals who are already active within local communities; there are also opportunities to work through formal, established community networks. This has been particularly important in Zimbabwe given the restrictions on advertising by the ALAC. The evidence suggests that the model is a direct way of targeting poor communities...
and individuals since AMCs are located in the poorer neighbourhoods of Harare. The AMC members are local residents and so accessibility to the ALAC both in physical and socio-cultural terms is greatly facilitated.

The model of working through community groups is not unique to Zimbabwe. It was first applied in Nepal, where TI Nepal has established partnerships with eight affiliated organisations (former TI-N support groups) in seven districts outside Kathmandu. TI-N provides training to the members of these organisations on ways of disseminating ALAC related information and handling public complaints. They receive small cash grants to support ALAC outreach at the local level. They collect, handle and forward grievances, providing the ALAC with district-level network and outreach.

Community groups in Kenya have a different role that is more focused on monitoring local expenditure, but they have a similar impact in terms of building the visibility of the ALAC and confidence of poor and marginalised communities in coming forward to report cases of corruption.

Unexpected partnerships with government open up alternative paths to change

Government channels for beginning to bring about change have proven to be non-obvious and often tangential. In Zimbabwe an unlikely but important government partnership has been developed with the Department of Immigration. In Latin America, NCs are finding that they can be more effective by working through local or municipal government than trying to access obvious ministries and departments at national level. These NCs have been open and opportunistic in their approach to government partnerships, and this is paying off in terms of improving access to decision-makers and the potential to strengthen TI’s influence with policymakers.

Partnerships with CSOs build demand for change

Where it is possible to build partnerships with like-minded organisations that share similar ideals in terms of increasing accountability of state institutions it can multiply the effectiveness of the demand for change. A good example was the case of Bosnia where an alliance between the ALAC and the Soros Foundation was instrumental in persuading the Council of Ministers to adopt a new anti-corruption law.

Horizontal exchange builds and maintains momentum and long-term networking

Limited, small-scale events to encourage horizontal exchange – some of them organised by the GTF (specifically in Zimbabwe) rather than the AC:DC programme or TI – have had some good impact in terms of building momentum, dissemination of ideas and building of networks which have the potential to be sustained. There is significant demand for more horizontal sharing events which would help to build a sense of a community of practice, whether it be around the AC:DC programme or at a smaller thematic or regional scale. It would also be important to ensure there are platforms for continuing the discussion – such as intranet or social network platforms – after the event.

Coalition building: Research projects that set the stage for advocacy

The introduction of an advisory group to review the work of the NIS assessment is a promising idea to establish early-stage engagement with agents of change and build their momentum so that advocacy does not need to be put off until after the research is completed. The advisory group brings together a representative group from across government and civil society. It is a way of ensuring the research is ‘live’ and reducing the risk that reports will gather dust on the shelf after completion. This is complemented by the NIS workshop which will seek to engage stakeholders for further validation and identification of recommendations, thereby creating opportunities for broader ownership and buy-in. Although the NIS project in Georgia has struggled to sustain the engagement of the advisory group, with some refinement it might be possible to encourage a more active advisory group which would help in delivering on some of the goals and objectives of the AC:DC programme.
6.2 Challenges

The key challenges faced by the AC:DC programme have been:

- **Translating the evidence base into strategic advocacy and systemic change** The AC:DC programme is now at a stage where projects have built a sufficient evidence base with which to advocate for improved anti-corruption policy and practice. The TI-S has focused on encouraging NCs to prepare advocacy strategies to guide project activities over the second half of the programme, and recent training has contributed to this. Emphasis needs to be on a strategic – rather than wishlist – approach to advocacy activities: prioritising not only issues where there is greatest need, but also those where there are real prospects and identified channels and mechanisms for delivering change. In some contexts, eg where it has not been possible to get government engagement, prospects for bringing about systemic change are very constrained. In these instances it is all the more important to be able to map out the channels through which change might be achieved; as well as alternatives in the event that some channels might be blocked.

- **Politics** in certain countries. For example in Ethiopia, Nicaragua and Venezuela, politics can be hostile to the efforts of civil society and can make it very difficult for CSOs to operate. And in other countries such as Zimbabwe, the political atmosphere can make it very difficult to develop constructive relationships with state organisations.

- The **scale and ambition** of the programme, which have created challenges in terms of clarity of focus, and the usefulness of the log frame. The programme covers projects in 23 countries (originally 25), across four geographic regions, with three different streams of work (although two streams have been consolidated into ‘evidence based advocacy’, they remain operationally different). This is a considerable management challenge, especially in view of the relatively small amount of money and the five-year implementation period. The log frame has had to capture the varied thematic streams of the programme, and provide them with a common set of goals and objectives and a common framework for performance management.

- The **rationale** for some of the non-ALAC, non-NIS projects is not clear, with a limited understanding of how they will contribute to the AC:DC purpose. To some extent, there is a sense that they are somewhat marginalised from the rest of the programme (not least because they are clustered in the Latin America region).

- Efforts to introduce the **MSC methodology** have not yet had much traction. Although this has been welcomed as a creative response to the need to be able to report impacts that are not always tangible, the purpose is not always clear to NCs – especially where they are already engaged in producing ‘human interest’ stories, which have a different objective and methodology. The risk is that human interest stories are being submitted as MSC stories. It is understood that the training provided in Berlin towards the end of 2010 only went so far in terms of demonstrating to NCs how they might operationalise the methodology. The recommendations below include a recommendation to follow up on this training with more hands-on capacity building. However, it may be that an additional reporting methodology is too resource-intensive for the AC:DC NCs at this time.

**Gender**

One of the GTF criteria is that projects and programmes should consider gender and the different needs of men and women within the activities and overall programme strategic outcomes. This is currently a challenge within the AC:DC programme. Some NCs, eg in Asia and the Pacific, work with women’s organisations to ensure a broad diversity of clients. In Pakistan and PNG the ALACs have organised community gatherings for women only. Yet cases brought by women make up 19 per cent of total cases across the portfolio, with
women reporting 36 per cent of cases in Argentina at the high end and 6 per cent in PNG at the low end⁹.

At global level, TI has carried out some preliminary work to mainstream gender within its operations. In February 2010, a gender audit was completed which found the following constraints to mainstreaming gender in the organisation:

- insufficient institutional commitment to gender mainstreaming;
- invisibility of gender in publications;
- low priority given by many staff to gender issues;
- gender imbalance on the staff and board of directors; and
- the need for greater knowledge on gender mainstreaming.

A gender strategy workshop in April 2010 was important for transforming some of the recommendations of the gender audit into practical and manageable steps. The workshop report noted that some of the core preconditions for a successful gender mainstreaming process were already in place, namely:

- a first analysis in the form of the gender audit;
- the results had been discussed and translated into objectives;
- commitment and ownership among staff were enhanced;
- a first plan, which included the concept of gender mainstreaming and defined responsibilities, had been delivered.

The workshop produced a gender planning matrix, published in February 2011. The matrix provides a comprehensive set of activities comprising:

- internal structural reforms for management and planning within TI-S;
- personnel requirements in terms of recruitment, terms and conditions and gender awareness; and
- programme management activities, knowledge and research to address external results.

Clearly it is still early days in the development of the TI-S gender strategy. The work so far has been systematic and comprehensive and has the potential to mainstream gender into the management, practice and results of the organisation. Translating this at NC-level and within programmes such as AC:DC is a remaining challenge.

Other vulnerable groups: Benefiting the poor

Similarly, whilst not an explicit objective of the AC:DC programme, TI could usefully articulate how best an anti-corruption programme can benefit the poor. Clearly direct participation of poor people through community-based initiatives helps understanding of how corruption impacts upon poor people; but programme interventions which seek to address this may actually be better targeted at the more influential middle classes. Local political economy analysis is likely to be important here.

6.2.1 Lessons

The challenges point to the following set of cautionary lessons.

Prospects for delivering impact at scale are limited – assessing the required scale is more important

The current ALAC model provides a good framework for helping individuals to address corruption in their lives. From the evidence of the AC:DC ALACs, including the longer-standing Bosnian and Montenegrin ALACs, there is little prospect with the current model and level of resources of building to scale. ALACs that are dealing with cases that have groups of beneficiaries are Rwanda, where 70 miners were helped and Montenegro, where the ALAC’s largest case is providing information to around 500 employees of privatised companies. In

⁹ Calculations exclude cases where gender is unknown.
Fiji, a case brought by an employee against his employer for embezzling pension payments resulted in legal action against the employer, benefiting all other employees, as well as against other companies found to be guilty of the same fraud.

One response may be to scale up efforts through a combination of coalitions, outreach and focused advocacy strategies based on the evidence derived so far. However, the issue does not necessarily need to be one of scaling up – but of identifying the appropriate scale within a given context in order to exercise influence to bring about change. Some of the ALACs (eg Fiji, Zimbabwe, Rwanda, Pakistan) have tried to find resources to extend their reach nationally and set up ALAC offices outside the capital. Given the early stage of development of the ALACs, it may be more effective to ensure the model is right with just one ALAC first; and then to consider the rationale for building a network of ALACs, which would go beyond issues of access to reflect strategic decisions about what kind of network of resources will deliver the greatest impact.

Defining and achieving ‘systemic change’ needs great care and focus

‘Systemic’ change, or ‘change in policy and practice’ is not limited to new or changed policy at the national level. Such change could be achieved at local, sector or ministerial level – and the work of some of the Latin American NCs at municipal or regional level reflects that. The potential of the ALAC model is that it complements efforts to bring about ‘top down’ change at policy level with building capacity for change from the bottom up. This might comprise behavioural change or increased demand for transparency and accountability.

At the same time, the evaluation cautions against accepting at face value what might be recorded as ‘systemic change’ or ‘policy change’. The evaluation has argued that, on the policy scale, verifiable policy change only comes with a score of 3, ie adoption of policy. Changes in terms of ‘change in discourse’ (eg verbal statement of intent) or ‘policy development’ can be easily reversed. Policy adoption, on the other hand, means that if government fails to observe the new or revised policy, civil society has a means of holding government to account.

The challenge now is to develop the programme, building on the lessons of the first half, so that over the second half the programme focuses more on achieving systemic change – or change in practice.

Gender needs to be mainstreamed upfront

Gender disaggregated data being gathered by the ALACs is an important foundation for ensuring NCs’ ability to reflect on and address gender issues over the lifetime of the project. The potential for data to determine the extent to which gender is reflected in the project is illustrated in Zimbabwe, where (as is probably typical for most of the AC:DC ALACs) access to the ALAC for women is a significant issue and where the research on the gender dimensions of corruption has been a first step in a more gender-nuanced approach.

The challenge for the AC:DC programme, given the current TI-wide context, is to follow through on the good start made with the strategy and planning matrix.

Most Significant Change is seeing a slow uptake

This has not yet taken off. It has been difficult for some projects to see the applicability, and for others to understand how MSC stories differ from ‘human interest’ stories and the stories they are already collating for different purposes. The MSC methodology has potential for generating data that can demonstrate project and programme impact – especially as the collection of stories can be directed to ensure that they look for the kind of scale impacts that are anticipated under the programme, rather than individual cases that have predominated up to now.

There is scope to make strategic use of politics

While it is important for TI to maintain its non-partisan stance and to avoid being too closely identified with the political process, it is nevertheless important to understand the political dynamics in play in specific contexts in order to be able to design effective advocacy.
strategies. From the evidence of the country visits, NCs have an innate understanding of these political dynamics – the challenge for the advocacy part of the programme is to make use of that understanding to underpin programme results and impact. For example, some countries such as Georgia and Bosnia may be more susceptible to international pressure in order to attract inward investment. In other cases, there may be entry points on particular issues which have political traction. Design of advocacy strategies needs to be able to take these possibilities into account.
7 Conclusions and recommendations

Overall, the evaluation team has been impressed by the work of the ALACs, the capacity of NCs, programme flexibility to allow tailoring and innovation at the local level, and the strong sense of purpose and direction within ALACs. The key conclusions are:

- The AC:DC programme has laid down very sound foundations for a programme that will have significant impact: at mid-point there is now an opportunity to focus on ensuring the programme delivers on that promise;

- Key actions to sharpen focus include:
  - Identifying and prioritising issues/sectors where progress can be expected (based on emerging evidence);
  - more strategic advocacy and building coalitions for change which are directly relevant to identified priority issues/sectors;

- Demand for ALACs has been demonstrated: there is now a need to build on their success with some strategic decisions about how the model should be tailored to the local context and priority needs;

- Critical to achieving ‘change in practice’ will be an approach explicitly based on an understanding of incentives and drivers of policy implementation and enforcement.

ALACs are already having an impact. To deliver the kind of scale impacts that are envisaged in the log frame, ALACs will need to build on the accumulating evidence to identify priority needs in the area of anti-corruption as the focus of their advocacy campaigns. While campaigns may seek to bring about new or changed policy to tackle corruption, the kind of work the ALACs are engaged in means that they are equally in a position to advocate for change in practice, ie for behavioural, attitudinal or institutional change. This is about aggregating individual cases to highlight systemic sector issues, providing a channel for redress, demonstrating that justice can be had and raising perceptions of the cost of corruption.

While confidence in the ability of the evidence-based advocacy component of the programme to deliver impact is lower, those projects that are currently completing the ‘evidence base’ part of the project – such as Georgia’s NIS – are delivering on the intermediate results in terms of generating new knowledge and defining issues for advocacy.

Translating policy change into systemic change or change in practice remains an ambitious goal, as the experience of Bosnia has demonstrated. Even where anti-corruption legislation is good, the will and capacity to implement and enforce it usually lags some way behind. As the Bosnia NIS study highlighted: ‘The BiH strategy will have to be followed by a clear commitment to adopt and implement this strategy and it will require permanent independent monitoring instruments in place.’ NIS studies should shed light on ways in which this gap can be diminished.

TI’s national chapters have demonstrated significant capacity in implementing AC:DC projects. The level of expertise and motivation is impressive and projects have been effectively supported by efficient, responsive and motivated programme management from Berlin, both in terms of AC:DC management and TI-S regional and thematic teams.

For the GTF, value for money is good, with the ALACs outperforming in terms of providing visible impact for a budget that is still fairly small. Key drivers of value for money have been the ability of the ALACs to attract further funding on top of the AC:DC grant; and the fact that ALACs and the NIS studies draw on TI’s broader and longer-term institutional knowledge and experience of implementing these projects.

The following recommendations offer some suggestions for consolidating the gains of the AC:DC programme so far and delivering on the promise of the first half of the programme. Recommendation 6 is offered more as a suggestion, in response to the specific ToR
question ‘How could the programme better target more vulnerable and marginalised communities and individuals?’ It is recognised that this is not mandatory for the GTF.

**Recommendation 1: Prepare and implement AC:DC capacity building plan**

It would be good to see the TI-S working to an explicit capacity building plan over the second half of the programme. This could form part of a broader document which sets out in general what is to be expected of the TI-S over the second half, by way of being transparent as to central costs and what is to be delivered for those costs. The primary concern, however, is that NCs should have their ongoing capacity building needs assessed and met – and that this should be delivered well before the end of the grant. This could involve making better use of sharing or rotating (contracted-out) expertise; and using online resources.

The evaluation has identified a number of possible focus areas for capacity building:

- The greatest demand has been for cross-country learning events. While it is tempting to plan something like this for the end of the programme, to retrospectively gather lessons, it would be better to see the sharing of lessons take place in time for the AC:DC programme to reap the benefits. AC:DC programme management is the most obvious candidate for driving and organising such events – but this does not necessarily need to be the case, they could feasibly be driven by NCs.

- In-country training on the use of the ALAC database. It is assumed that this will be provided in due course, as the new database is rolled out. However, NCs may have unique needs as in Zimbabwe where the activities of the AMCs are currently not being captured.

- Training in specific technical skills over and above the legal and anti-corruption skills areas that TI is normally able to draw on. Such expertise might include, for instance, audit, public financial management, procurement and journalism. In the context of the overall growth of TI, as well as the growth of the ALACs, there is an increasing need to be able to reliably source such skills, either in-house or on a consultancy basis, as long as consultants are closely aligned with the TI mission and objectives.

- Further capacity building is needed if the MSC methodology is to take root. The MTE recommendation is to limit the pilot to two or three performing countries, and provide in-country, office-based training to ‘hand-hold’ NCs in getting out a set of good MSC stories that can then serve as an illustration of the method to other NCs.

- Training in strategic advocacy which includes political economy assessment to encourage a more ‘politically conscious’ approach to framing goals and expectations and mapping out a realistic strategy and action plan for delivering on those expectations.

**Recommendation 2: Prepare and implement strategic advocacy plans**

Following the recent advocacy training provided by the TI-S, all NCs should now be in a position to develop advocacy plans in order to improve the focus and methodology of their advocacy activities. The advocacy plans should be developed with the log frame as a reference point, focusing in particular on making the linkages between activities and outputs, and outputs and purpose. As indicated above, and in Section 4.4.3, the advocacy plans would benefit from using political economy methodology to help identify entry points and map out strategies for delivering change.

**Recommendation 3: Consolidate work on monitoring and performance measurement**

The AC:DC programme has done considerable good work on developing data and indicators for monitoring the projects and the programme. The MTE has attempted to reconcile baseline data with the data being generated by the monitoring tool and the ALAC database,
but this has been limited by availability of data and the resources allocated to the MTE\textsuperscript{10}. There is now a need for a piece of work to be done to consolidate the various data sources to enable analysis across the programme and across time. This would preferably be a consultancy, so as to ‘ringfence’ the work from other demands on TI-S staff time. Some of the issues that will need to be addressed include:

- ensure data on all log frame indicators is being captured and clearly presented,
- capture of data on ALAC contacts and cases at community/AMC level,
- it would be very useful if the new ALAC database were to capture estimated numbers of beneficiaries in the case of a collective client.

The quarterly narrative reports submitted by NCs could also usefully include a ‘boilerplate’ section to capture basic project data such as:

- value of project (budget),
- cofunding and other partners,
- start date,
- planned closure (and any extensions),
- expenditure to date,
- allocation of resources (ie % full time resources),
- outputs.

As an aside, several respondents felt that the narrative report was onerous in terms of having to report on impact on a quarterly basis, and specifically for the quarter under review. There may be scope for streamlining this requirement, or for less frequent progress reporting – although it is also worth pointing out that in Zimbabwe they felt it was very useful to have the discipline of reporting on impact for their fund raising efforts with other donors.

**Recommendation 4:** Develop thinking on use of ALAC community structures

Zimbabwe’s AMC structure is proving to be a successful model for awareness-raising, community mobilisation and identification of petty corruption. It is also providing a valuable advice and referral service for the many non-corruption related challenges which face poor and socially-excluded people. There is a question as to how important this advice service is to the success of the ALACs. TI needs to take a strategic view on whether a committee such as the AMC needs to provide this kind of service to be successful in awareness-raising, mobilisation and identification of corruption.

The model could usefully be trialled in another country before further rollout, in view of the uniquely politicised environment in Zimbabwe. If the model is found to be viable, it may also be beneficial to devote more capacity building efforts for the AMC advice and referral role so that the utility of the AMCs for the community is optimised and sustained.

In Kenya, the ALAC has established anti-corruption watch committees to follow up corruption issues at community level. This is a different model from Zimbabwe and seems not to involve any ‘service delivery’ in the form of advice or referral. It might be useful to compare these two models from Zimbabwe and Kenya, and other forms of community outreach such as partnership arrangements with other compatible NGOs, to develop a typology of outreach models and the opportunities they present for anti-corruption activities in varying socio-economic and political operating environments.

\textsuperscript{10} The MTE will separately provide all the data gathered through the baseline and self-assessment survey, as well as a summary presentation of the results. Although the information gathered has informed parts of this report, the data in aggregate was not considered reliable or consistent enough to be presented here in any comparative way.
Recommendation 5: Use gender disaggregated data to strengthen gender dimensions

The fact that the ALACs have started to collect gender disaggregated data provides a starting point for strengthening the mainstreaming of gender, at least within the ALAC component. Suggestions which have emerged from the evaluation include:

- Use the Results section of the TI-S gender planning matrix to guide a more strategic approach by the AC:DC to gender mainstreaming.
- Strengthen collection/presentation of gender disaggregated data to ensure that all indicators being monitored are being routinely reported.
- The ALACs have provided isolated, documented evidence of gendered corruption which is either service-related (the taking of bribes in maternity wards) or sexual bribery (women tenants being threatened with eviction if they do not either pay a bribe or provide sex). These provide a strong evidence base for anti-corruption cases and wider advocacy. It would be useful if these were to be aggregated for publication both internally and externally to raise awareness of the gender dimensions of corruption.
- The ALAC database will also be able to shed light on differential access to ALACs for women in terms of contacts and cases and the possible advantage of community-based AMCs (in Zimbabwe, community meetings resulted in more contacts coming from women, but this did not filter through in terms of more cases being taken up by women). This information could be used to inform an adaptation of the ALACs in all countries to encourage better access for women, to identify barriers to women in taking up cases and to help them overcome those barriers.
- The cross-country data emerging would be valuable input to targeted research to identify country-specific areas of corruption which have differential impact on men and women. Research could involve surveys of women’s groups, literature review and review of ALAC data to identify key areas of corruption, and case studies to identify impacts. All of this should ultimately inform the identification and design of advocacy campaigns.

Recommendation 6: Consider targeting of vulnerable and marginalised communities and individuals

National programmes should examine national data on poverty, vulnerability and social exclusion to identify which communities are most vulnerable and marginalised, in addition to those which are poor. Identification of these will have both geographical and socio-economic dimensions. They may wish to identify programme responses to address corruption and poverty or social exclusion.

This analysis may need to be refined with other local and international research which can define more strategically which types of corruption have greater direct and indirect impact on vulnerable and poor communities. For example this may be a balance of ‘grand’ and ‘petty’ corruption. The latter having direct impact on the poor, vulnerable and marginalised individuals; but high-level corruption may be having a greater negative impact in terms of the diversion of resources away from services to the poor.

Programme targeting will also benefit from political economy analysis to identify those areas of corruption against which AC:DC activities are most likely to achieve some success. This will help to identify constituencies of support for anti-corruption initiatives which may come from vulnerable and marginalised communities themselves but are also likely to include influential middle class target groups.

Evidence from the field visits suggests that the community-based ALAC outreach model in Zimbabwe is a direct way of targeting poor communities and individuals since AMCs are located in the poorer neighbourhoods of Harare. The AMC members are local residents and so accessibility to the ALAC both in physical and socio-cultural terms is greatly facilitated.

Analysis of the first contacts made to AMCs will help to define those areas of corruption which are of most immediate concern to vulnerable and marginalised individuals.
Recommendation 7: Developing accountability frameworks

A crucial dimension of the GTF is enhancing the ability of citizens to hold government institutions to account. The work of the ALACs is vital in this respect in terms of building demand for change and voice, but could be strengthened by the development of further monitoring tools. These will provide the further information and data to help focus advocacy effort and to build demand for change. A sound legislative framework is a critical first step: other monitoring tools might include citizen report cards along the lines of the Kenya experience, and audit reports from supreme audit bodies.

The NIS methodology provides a rigorous assessment of a country’s accountability framework which could inform the identification and development of appropriate accountability tools. In the case of countries with recent NIS studies, the gaps in the accountability framework should already be evident and the issue becomes which tools can best plug the gaps. It is recommended that those NCs which are not able to draw on the findings of a recent NIS report review the gaps in the accountability framework in their country in the light of experience to date; and that all NCs suggest an appropriate set of accountability tools.

Recommendation 8: Log frame adjustment

The MTE team recognises that significant work has gone into development of the AC:DC log frame and that further substantial revisions would not necessarily be useful at this stage. However, the evaluation has not found that an output comprised of NC demand is useful either for evaluation purposes or for incentivising performance. It would be more relevant to include an output for citizen demand for improved anti-corruption policy and practice.

The TI-S could develop a fourth scale, a demand scale, with which to measure performance in building citizen demand. The input factors could be quite circumscribed and locally determined, so as to ensure the output is as much as possible attributable to the AC:DC projects. In the case of the ALACs, for instance, increases in the number of contacts already provide a proxy indicator of demand.

The advocacy scale could then be used as a broader indicator of NC capacity under Output 4, which would have the advantage that there is an indicator under this output that is relevant to all projects (not just ALAC projects).

In addition, the log frame indicators could be rationalised. Data is currently not being collected for several of them. Those that are dispensable could be removed and for those that are indispensable, there is a need to ensure that the data is being captured and presented in an easy-to-digest format for inclusion in annual reports, and for future evaluators (see also Recommendation 3). Some need to be rephrased in terms of specific, timebound targets.