

1. Introduction

TI-S is implementing a five year TI Vietnam Programme entitled “To contribute to effective implementation of anti-corruption policies and practice in government, business and society, 2013 - 2017”. UK DFID, DFAT Australia, IrishAid, and the Finnish Embassy in Vietnam have supported the programme for the duration 2013 – 2015. It will be used for the development of the new TI Vietnam Programme 2016-2018 which is now being shaped. Donors will also take the MTR into consideration for future funding.

It is managed by the Asia Pacific department (APD), while its execution and coordination is undertaken on the ground by Towards Transparency (TT) – TI’s National Contact in Vietnam. The first phase of the TI Vietnam programme 2013-2015 will officially end in December 2015. The budget for the 2013-2015 phase is approximately 1.6 million Euros.

TT have received a permit to operate as a Vietnamese NGO (VNGO) under the umbrella of Vietnam Union of Science and Technology Associations (VUSTA). This is a great milestone towards the goal of forming an independent TI Chapter in the future. However, the transition phase will be a complex one. TT and TI-S will continue the set-up and develop a three year TI Vietnam Programme starting 2016. The difference will be a new entity involved, the new VNGO, and TT will transition projects on a continuous basis until the VNGO will be capable to lead the programme independently.

The Vietnam program comprises 4 components:

COMPONENT A: Institutional, Capacity & Network Strengthening

COMPONENT B: Public Sector Integrity, Diagnosis & Solutions

COMPONENT C: People and Youth Engagement & Support

COMPONENT D: Business Integrity

Overall, the findings of the evaluation were found to be quite positive, pertinent and in alignment with APD’s and TT’s assessment of the programme. TI-S continues to remain impressed with the programme and the team in TT, considering the difficult context of the country. In combination with great local leadership and support from TI-S, the current model of the programme and its flexible set-up facilitated its success. Several points identified in the report have been taken into consideration for next year’s work as well as future planning. The recommendations made were rather broad and will require more thought internally about how to best address the issues raised.

On the positive side, the Programme was found overall to be manifestly **relevant** and useful to various stakeholders and partners, with progress being on track. The evaluation points to concrete indications of results and **effectiveness** despite it only being the mid-point of the programme and many major activities not yet completed. The programme was found to be **effective** and **remarkably time-efficient** especially considering the sensitive environment TT is operating in. **Cost efficiency** is reasonable and when considering the programme as an investment for significant outcomes in the future then it also represents **good value for money**.

In terms of improvement needed the evaluation points to the need for the programme to **focus on fewer but deeper activities**. The new programme design should include options for **replicating on a large scale and expanding** through partners and other stakeholders which would have significant impact at a national level. In order to ensure sustainability, they argue that the **current programme design is not well suited for the future** due to changing donor landscape, independence of TT/new VNGO and that **TT lacks a fully developed management system** given its growth in the last few years.

2. Response to findings

Impact

The evaluation argues that insufficient thought has been given to scaling up or replicating at larger scale through CSO partners, government and other stakeholders. We agree that in some cases, upscaling and replication in quantity would be useful for impact. Nevertheless, we believe that this should only be undertaken upon critical assessment of the availability of resources and capacity to deliver and is not the goal of all initiatives of the programme. This includes assessing the political space and sensitivities of such scaling up and replication, executing a thorough analysis and consideration of the situation, the results of the pilot period, capacity of TT and other partners/stakeholders as well as required resources. A large part of the programme is aimed at contributing constructively to ongoing government processes and building a strong trusting relationship with relevant government departments to influence policy - this must be balanced with large scale public engagement programmes.

The report manifestly targets the donor group as their audience and does not account for the beneficiaries of the programme – a crucial aspect of our work – which the future programme will inherently emphasize. In the same vein, we feel the evaluators use the programme goal as an ultimate indicator of success “To contribute to effective implementation of anti-corruption policies and practice in government, business and society” which undermines the multiple nimble and strategic ways in which the programme was successful, even if small. Perhaps a different understanding of what constitutes “contribution” is the issue here as TI-S and TT both take a realistic perspective that change in a country such as Vietnam is difficult and slow, particularly around the topic of corruption. Moreover, expectations are different that they would be in countries with greater space for civil society or for example of an organization working on poverty reduction. The report mentions the impossibility of a one-off entity such as TT having any national-level impact, which we disagree with. TT has proven to have impact at a national level; an example from the last programme 2009-2012 was when the government changed their UNCAC report to be more realistic upon TT’s production of the UNCAC shadow report. Similarly, many ALAC examples across the world have shown that a “small stand-alone ALAC” in a country can still have a national impact.

Efficiency

We agree that the programme design resulted in focussing on many things rather than fewer more thoroughly. In the next programme design, we will ensure to take this into consideration. However, it is important to reflect that although some activities may seem "small" and "cost-effective" to cut, they might be important from a strategic point of view as they mean contributing to Vietnamese government priorities, which contributes to sustaining a good relationship with them.

We agree that the amount of overall work on the NIS was significantly underestimated and that the complexity and required resources for such a big study like the NIS in the Vietnamese context was underestimated. We agree with the evaluation that, considering the complex multi-year programme, this has led to significant delay

and was seen as learning by doing. TT will ensure to be more realistic with future plans and take into consideration complexities of such projects.

Sustainability

We agree with the point that the current set-up assumes multi-year commitments from a dependable group of donors and cannot handle variable and uncertain funding levels from year to year, and share the concern. Although it is to be expected that new contracts are finally signed closer to the end of the programme (contracts for the current phase were signed very close to the start of the programme) it is also clear that the budget for 2016 will be substantially lower, and the recommendation to focus on fundraising is a good one. TI-S believes TT is far too donor dependent and has not sufficiently focused on other sources of funding (for instance, fundraising from the public and corporate sector). In the future, it will be crucial for them to diversify their sources of funding.

There is a changing landscape in which donors are becoming more parsimonious and are increasingly moving towards project funding versus core funding. The future programme should separate external and internal activity costs, indirect (overhead) and direct activities and costs to respond to this funding design. We agree with this assessment. We take this as a lesson learnt and the new TI Vietnam strategy and programme will reflect this noting however that it will still be necessary for part of donors' funding to go towards the infrastructure of the programme (i.e. overhead and indirect costs) in order for the programme to function and have impact.

Moreover, we believe that the biggest challenge lying ahead will be the transition to the VNGO. The current political environment in the country and the transition of processes and operations under a different set of regulations will be a challenge that needs flexibility to adapt and respond to opportunities that emerge. In fact, the transition itself will essentially establish the best TI Vietnam programme model moving forward.

Current Programme Set-up

We agree that Component A currently covers both capacity building of TT and CSO engagement; this is too much and is not workable. The new TI Vietnam strategy and programme is being designed to specifically address this issue and separate TT's organisational development needs from programme activities.

While our experience is that the MEL system is good and reflects output and outcome progress well we agree that learning is not systematized within the MEL framework. This could be improved with regular and documented mini-evaluations and discussions around learning and we agree with this statement. Our intention going forward is to systematize mini-evaluations around learning every six months.

On the evaluation's point of developing full internal management systems, from TI's point of view, TT is one of the most advanced entities we have in the region. They are well organised, keep in touch with organizational development updates at TI-S, liaise with APD to improve their systems. However, we believe that with a staff of 16 TT is still a small-sized organisation and organisational systems should reflect this and not be overly complex and burdensome. In light of this, TT have already started to build up and develop an institutional memory and back up system, e.g. through requesting staff to document key processes, outcomes and lessons learnt, improving the internal database and MEL system, organizing staff and component leader meetings to update and exchange information, ensuring an appropriate hand-over process in case of staff turn-over.

Communication

We agree that the programme lacks strategic communication to various stakeholders of how TT engages with other actors and how they should best approach and communicate with a much wider stakeholder population (for example team needs clarification on use of concepts such as “transparency”, “integrity”). In addition, we agree that the youth could benefit from more engaging and up-to-date communication platforms. We will look at how to improve this in the future.

Can TT in some cases be more insistent or persistent and “less patient” from a political perspective?

The evaluation reflects well TT’s challenge in working in the current political context and argues that TT has been very nimble in judging what actions are feasible and in what forms given the space they can operate in. In the same vein, due to the political context as well as TI/TT’s current position in the country, TT’s responses or actions will need to be based on the judgement of their potential outcome. TT’s statements need to be fair, independent and accountable. TT have been able to balance well how much they can push within the boundaries and space provided by the government. This has been appreciated by donors who are more reluctant of a bolder approach. Nonetheless, in the future, campaigning to mobilize an increased amount of stakeholders is an approach which we support.

3. Response to Recommendations

TI-S and TT welcome most recommendations proposed by the evaluators and will need to unpack and develop solutions but the evaluation has clearly identified areas to consider in the development of the new programme.

Recruiting a professional fundraising position. We agree that fundraising should be a high priority for TT/VNGO to ensure sustainability of a future TI chapter in Vietnam. However, as TT is transitioning to the VNGO, we think it would be better to recruit and base that position at the VNGO. The function should also cover networking and relationship building which is very important for the start-up of the organization and will significantly contribute to fundraising. This position would increase the programme’s overhead costs; therefore the future programme could have a separate component “mobilizing people” which could entail having a fundraiser who would diversify funding outside of the regular donor stream (fundraising from the public, from the corporate sector etc.)

TT starts to define and document systems for all important processes. We agree with this recommendation and TT have started to build up and develop an institutional memory and back up system, e.g. through requesting staff to document key processes, outcomes and lessons learnt, improving the internal database and MEL system, organizing staff and component leader meetings to update and exchange information, ensuring an appropriate hand-over process in case of staff turn-over. However, while it is critical to put the right systems in place, with 16 staff TT is also still a small-sized organization and organizational systems should reflect this and not be overly complex and burdensome.

Prioritizing internal areas and migration to VNGO. We agree with this recommendation and organizational development to enable successful transition from TT to the VNGO is set as the top priority of our 2016-2018 programme.

Define a modular programme with a clear distinction between TT development activities, key mission operational activities and other activities. We think this recommendation is reasonable but needs to ensure balance between internal development and external activities as well as taking into consideration funding sources and requirements. In the new programme, we have separated the CSO network development from the institutional development activities as well as identifying optional activities, which can contribute to

achieving the set objectives but can be scaled up or down or stopped if funding varies (e.g. youth camps or replication of business collective action initiatives)

Concentrate, at least for the next two years, on ensuring that key promising and important initiatives/projects are very well supported & managed, with a view to subsequent replication or scaling up by other partners/stakeholders. We broadly agree with this recommendation and have reflected this approach in the strategy document. For example, while piloting ALAC in Hanoi, TT are exploring fundraising opportunities and working with our partner to develop a project proposal to maintain and extend this model to other localities and in other sectors, such as forestry where we have accumulated some expertise and experiences from the previous REDD+ project. Or regarding the Transparent Town initiative, TT are planning to introduce this initiative to other localities and motivate other provincial leaders to take it. However, it should be noted that any replication or scaling up need a thorough analysis and consideration of the situation, the results of the pilot period, capacity of TT and other partners/stakeholders as well as required resources.

4. Follow-up Action

- Focus on diversifying fundraising, and hire for a fundraising position once the new VNGO is set up within a wider component of “mobilizing people”
- Outline a thorough risk assessment and prioritize internal areas and migration to VNGO, such as a governance road map
- Develop a TI Vietnam programme for 2016-2018 considering the following:
 - focussing on fewer and more focused activities
 - define modular programme distinguishing development activities, key mission operational activities and other activities. However, it will still be necessary for a percentage of donors’ funding to go towards the infrastructure of the programme (i.e. overhead and indirect costs) in order for the programme to have impact
 - adding options for replicating and expanding activities at a large scale after having thoroughly analysed and considered the situation, the result of the pilots and the required capacity
- Systematize mini-evaluations around learning every six months, perhaps during reporting, or by including learning in the MEL framework
- Assess internal management system needs and improve operations
- Improve communication with other stakeholders and with the youth strategy

Additional comments:

P.21 GCB and CPI will take place not in 2015 but in 2016.