



MID – TERM PROGRAMME EVALUATION

TI Vietnam Programme “To contribute to effective implementation of anti-corruption policies and practice in government, business and society, 2013-2017”

Final Report

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ABBREVIATIONS AND ACRONYMS

ACD	Anti-Corruption Dialogue
ALAC	Advocacy and Legal Advice Centre
CDI	Center for Development and Integration
CECODES	Center for Community Support Development Studies
CIA	Commission for Internal Affairs [of the CPV Central Committee]
CPI	Corruption Perceptions Index
CPV	Communist Party of Vietnam
CSO	Civil Society Organisation
DAC	Development Assistance Committee [of OECD]
DEPOCEN	Development and Policies Research Center
DFAT	Department of Foreign Affairs and Trade [Australia]
DfID	Department for International Development [UK]
ED	Executive Director
FACE	For A Clean Education [Club at HSU]
GCB	Global Corruption Barometer
GI	Government Inspectorate
GoV	Government of Vietnam
HCMC	Ho Chi Minh City
HSU	Hoa Sen University
HR	Human Resources
IMC	Integrity Me Contest
INGO	International Non-Governmental Organisation
IPL	Institute of Public Policy and Law
ITBI	Integrity and Transparency Business Initiative
KPI	Key Performance Indicators
M&E	Monitoring & Evaluation
MEC	Center for Media in Educating Community
MEL	Monitoring, Evaluation, Learning
MTE	Mid Term Evaluation
NGO	Non-Governmental Organisation
NIS	National Integrity System
OECD	Organisation for Economic Co-operation and Development
OGP	Open Government Partnership
PACCOM	People’s Aid Coordination Committee
REDD	Reducing Emissions for Deforestation and Forest Degradation
SHTP	Sai Gon High Tech Park
SME	Small and Medium-sized Enterprise
TI [-S]	Transparency International [Secretariat] (in Berlin)
Todocabi	<i>Tớ đồ cậu biết</i> – Please guess
Toidibenhvien	<i>Tôi đi bệnh viện</i> – I am going to the hospital
TOR	Terms of Reference
TPV	Tax Payer View [contest]
TT	Towards Transparency Viet Nam

TTP	Transparent Town Project
UNDP	United Nations Development Programme
UNCAC	UN Convention Against Corruption
UNODC	UN Office on Drug and Crime
VACI	Vietnam Anti-Corruption Initiative
VCCI	Vietnam Chamber of Commerce and Industry
VIA	Vietnam Integrity Alliance
VIJUSAP	Vietnam Judicial Support Association for the Poor
VNGO	Vietnamese NGO
VUSTA	Vietnam Union of Science and Technology Associations
WB	World Bank
YBO	Youth Box Online Channel
YIS	Youth Integrity Survey

EXECUTIVE SUMMARY

The programme “To contribute to effective implementation of anti-corruption policies and practice in government, business and society, 2013 - 2017” was developed using recommendations and lessons learned drawn from the first programme.

The programme is executed by the Transparency International Secretariat in Berlin and coordinated and implemented by Towards Transparency (TT), TI’s national contact in Vietnam.

TT is a non-profit company, but the goal is to create a local NGO that ultimately can become a full TI chapter. The first phase of the Programme officially started in January 2013 and ends in December 2015.

The purpose of this mid-term evaluation is to provide an objective assessment of the achievements and results, weaknesses and strengths of the programme and its performance, but also to provide clear and forward looking recommendations that can guide TI Secretariat and Towards Transparency in refocusing interventions and developing strategies for the future implementation of the programme 2016-2017, before seeking funding for the second half. The evaluation relied mainly on interviews with stakeholders (some 50) and document study, as well as the team’s own observations.

The overall five-year programme aims to achieve a relatively ambitious set of 4 inter-related objectives – components¹, namely: (A): Institutional, capacity & network strengthening, which works towards developing capacities of civil society organisations and their participation in anti-corruption, as well as strengthening networks and coalitions for anti-corruption in Vietnam; (B): Public sector integrity, diagnosis & solutions, which contributes to the knowledge and evidence-base on (anti)corruption, and promotes tools and solutions to curb it; (C): People and youth engagement & support, which works towards building citizen knowledge and participation in anti-corruption, in particular by the youth; and finally (D): Business integrity, which works towards raising awareness and promoting participation of the business sector in addressing corruption.

The corresponding budget for this initial three year period is EUR 1.8 M, financed via TI-S by a joint financing arrangement of 4 bilateral donors.

All the interviewees considered TT to be highly professional, technically competent and well run organization, with qualified, committed knowledgeable and helpful staff, and with high credibility, expertise and quality work in the areas of integrity, transparency and anti-corruption well suited to the Vietnamese context (both directly and as conduit for TI’s global expertise). And TT was also very skilful in handling the sensitivity of these subjects and activities in a constantly evolving and not always predictable Vietnamese environment.

TT is still a relatively new organization and their staffs have grown significantly. TT is now at a stage in development and size where the more informal and oral ways of working will no longer be adequate to ensure sustainability and full autonomy. The institutional backup still seems rather limited, and it

¹ Plus a fifth component (E) REDD+Governance and Finance Integrity with separate financing; not part of this evaluation.

is not clear how institutional memory is adequately ensured if one or more key operational persons leave. TT does not yet have fully developed management systems for its key operational business processes, only for administration and finance. In hindsight at least, there is a case that TT has been too ambitious and spread too thinly, not focusing enough, and sometimes underestimating the amount of work actually needed, especially for the more complex activities.

Although TT recognizes the rapidly changing donor landscape and funding challenges and has started to reflect on alternative ways of funding, particularly from business, this is still at a very initial stage. TT does not have any professional fundraising staff. This is particularly noteworthy – and critical – since adequate funding from traditional donor is far from assured even for 2016 and 2017, and the lead times for engaging significant resources from new non-traditional donors or funding sources is typically a couple of years and requires lots of sustained work.

The four components are all **relevant**, and generally the detailed subcomponent goals and activities as well, as is also reflected in positive opinions and uptakes from stakeholders and partners.

Cost efficiency seems reasonable, even if including the transaction overhead due to the peculiar institutional arrangement and significant involvement of TI-S staff (for capacity building and donor finance management), especially considering that many activities are pilots or more or less untested and innovative approaches. It is probably not optimal, but difficult to say to what extent, since neither the programme budget nor TT reporting is set up to allow easy and tracking of different cost categories. **Time efficiency** has been quite remarkable, and even more so considering the special challenges and sensitivities, and sometimes obstacles.

The flip side is that the cost per the still small number of “beneficiaries” so far is rather high. But this is largely a fixed cost; with replication and wider reach the cost efficiency will automatically improve.

With regard to **effectiveness**, it is partly too early to say as several major activities are not yet completed or operational activities started in earnest. But there a number of indications –such as interest from new stakeholders in joining or replicating, continuing audience interest on social media, coverage of events and communication of TI products - that for example the various business integrity initiatives and some of the youth initiatives have been effective in the short term and at (so far) small scale.

With regard to effectiveness in the longer term and **sustainability**, it is not possible to say anything with certainty at this stage. Be that as it may, this cannot be ensured by TT alone, given its limited staff and financial resources. Significant **impact** at national or even local level cannot be achieved without large scale replication or much expanded leverage through partners and other stakeholders.

The programme is designed as a rather typical all-inclusive and static donor programme, quite understandably, as this packaging has arguably been necessary for smooth joint donor financing via TI-S and formal contracting of implementation from TI to TT. There is a well-designed monitoring system also testing KPIs from this year. Reporting is clear and comprehensive, and to the satisfaction of donors and TI.

But this model is not well suited for the future. It puts core mission activities, ‘project’ type initiatives, internal organizational and overhead activities, and longer term organization development in the same package, all folded in under four components. This makes it more difficult to separate

external and internal activities and costs, indirect (overhead) and direct activities and costs. Furthermore, the programme design –being based on assumptions of firm multi-year commitments from a dependable group of donors - cannot handle variable and uncertain funding levels from year to year, which is the more likely environment in the future.

In conclusion, TT has achieved a remarkable level of professionalism and credibility as an organization and also so far skilfully implemented the programme, producing many encouraging and concrete indications of results, all the while with due consideration to sensitivities and the acceptable space for action.

However, successful as it is, both TT and program design needs to evolve significantly in order to ensure sustainability in the medium term future.

The main recommendations are:

- TT to as high priority recruit or attach a professional fundraiser, preferably full-time, and clearly vest primary responsibility for fundraising with one person within TT.
- TT starts to define and document systems for all important processes. This will ensure institutional memory and backup, facilitate training of new staff, allow more rigorous quality management and reassure donors, particularly new ones and in view of direct financing. At the end of the process, confirm standards reached through an external system audit.
- In general, work on the internal areas and the organizational implications of partial or full migration to VNGO, as a priority in 2016-2017. This should include a thorough analysis of pros and cons and descriptions of different relations and distribution of roles and resources between the two entities, as well as a migration plan.
- Define a programme for 2016-2017 (and in the future) that is modular with a clear distinction between TT development activities towards sustainability, key mission operational activities, and other activities. The latter should be presented in a hierarchy of priorities of result-oriented activities that can be scaled up or down or (temporarily) stopped without destroying the coherence and synergy of the programme and key staff retention as and if funding varies.
- Concentrate, at least for the next two years, on ensuring that key promising and important initiatives/projects are very well supported and managed, with a view to subsequent replication and scaling up by other partners and stakeholders. Not to hesitate to terminate less critical, peripheral or smaller activities, even if they have positive results but are relatively less cost effective, not easily scalable or lack convincing 'what next' answers. Fewer but deeper activities.

1 INTRODUCTION

1.1 Background

TI Vietnam first ever programme “Strengthening Anti-Corruption Demand from Government, Private Sector and Society, 2009-2012” completed in 2012. Its final evaluation report conducted in July 2013 concluded that: the programme has generally been effective in reaching its objectives; more importantly TI has established itself as an important player on anti-corruption in Vietnam, and thereby built a good basis for a future national chapter.

The follow-up TI Vietnam Programme entitled “To contribute to effective implementation of anti-corruption policies and practice in government, business and society, 2013 - 2017” was developed using recommendations and lessons learned drawn from the first programme. The programme is executed by the Transparency International Secretariat in Berlin and coordinated and implemented by Towards Transparency (TT), TI’s national contact in Vietnam. The first phase of the Programme officially started in January 2013 and ends in December 2015. The programme document requires conducting a mid-term evaluation (MTE) before the completion of its first phase.

1.2 Evaluation objectives and scope

The Terms of Reference (Annex 1) specify that the purpose of the evaluation is to

a. Provide an objective assessment of the achievements and results, weaknesses and strengths of the programme; an analysis of its performance regarding process, relevance, and sustainability; and the extent to which the programme is contributing to desired impacts.

In short, the MTE looks into four key issues: relevance, effectiveness, efficiency and sustainability. It is too early to evaluate impact of the programme although early signs of impact would be captured to the extent possible and practical;

b. Generate lessons learned and good practice from each of the respective objectives of the programme;

c. Provide clear and forward looking recommendations that can guide TI Secretariat (TI-S) and Towards Transparency (TT) in refocusing interventions and developing strategies for the future implementation of the programme.

In addition, a stakeholder assessment constitutes an integral part of this evaluation, but is the object of a separate report. Based on the feedback collected from the selected stakeholders, the analysis will identify the level of relevance, interest, influence of each stakeholder to the TI/TT programme to inform future planning. This forms a

1.3 Methodology

The Team employed OECD/DAC quality standards and criteria for the evaluation as TOR requires. As such, the team planned and implemented the evaluation in close cooperation with TT while ensuring the objectivity and independence of the evaluators and respect for stakeholders’ views.

Primary data was collected chiefly by face-to-face interviews, Skype talks (with TI-S and persons outside Vietnam) and domestic telephone talks and semi-structured discussions with some focused groups of beneficiaries (i.e. mainly students - youth groups), as well as on-line interview. The fieldwork was conducted from 7 to 20 May in Hanoi and 21-22 May in Ho Chi Minh City following a basic documentation review to obtain secondary data, which was later supplemented after the field work. Annexes 2 and 3 detail the individuals consulted and documentation collected and reviewed. The list of stakeholders for potential interview was furnished by TT; the Team then selected as many as possible given the time constraints and availability during the period. The youth interviewed in focus groups in HCMC were proposed by TT for practical reasons, they were beneficiaries of activities, but also (at the time or subsequently) volunteers or otherwise engaged to work with TT. The interviews served both as input to the evaluation per se and to the stakeholder assessment, and lasted typically 1-1.5 hours, using interview guides but otherwise allowing respondents leeway to respond freely.

Quality control was exercised by triangulating data obtained through different sources. A short debriefing session was arranged where the team leader shared very preliminary findings with TT Management Team. At the request of TT, during data processing stage, a summary of snapshots of findings and recommendations was then shared with TT with the aim to serve as inputs for staff discussion during TT Staff Retreat held early June 2015. Finally, the draft report was submitted for the review and comments by TI/TT before its finalization.

1.4 Evaluation arrangements and limitations

Logistics arrangements were made in a timely and satisfactory manner thanks to effective inputs of all TT staff and Management Team. In particular it proved to be very productive to have a focal point – liaison person for smooth and timely coordinating between the MTE Team and the TT Office. As a result, the MTE Team did not face any major constraints. All field visits, physical meetings, Skype and telephone talks and email interview were arranged and carried out basically as planned, with some spillover into early June. Necessary documents both in soft and hard copies were provided on time by TT.

Nevertheless, this evaluation is limited in its scope, namely: (i) It does not cover outcome and impact evaluation, except in a very tentative and indicative manner, since many major activities are yet to be completed or have just recently been completed; (ii) Climate Governance does not fall under this evaluation; its mid-term evaluation has just been completed; (iii) The time frame is limited to two years 2013 and 2014 only although progress review is extended a bit to cover until end of April 2015.

1.5 This Report

The report is divided into five main sections. Following this introduction, section 2 gives an overview of the programme's objectives, scope and implementation arrangements and status in addition to a brief description of TI/TT relationships. Section 3 is the main part of the report. This section starts with a brief account of the programme context and then presents the

findings of the evaluation by programme components. The main conclusions and recommendations can be found in Section 4 and 5 respectively.

2 OVERVIEW OF TT AND PROGRAMME

2.1 TT and relation to TI

Founded in 2008 Towards Transparency (TT) is a Vietnamese non – profit consultancy company, which aims to contribute to prevention of and fight against corruption. Since March 2009, TT has become the official National Contact of Transparency International (TI) – the global movement with more than 100 national chapters worldwide. The association with TI, the ‘brand’ as well as its resources, is considered a very strong advantage, and a major component of TT’s strength, especially when TT manages to ‘localize’ international practice and knowledge. It is also an added assurance for donors, as the backing and support from TI obviates more extensive assessments of TT and its programmes that would be required if TT were a stand-alone local organization. On the other hand, TT manages to facilitate and substantiate TI’s ties and influence in the country.

2.2 The Programme First Phase 2013-2015

The overall five-year programme aims to achieve a relatively ambitious set of 4 inter-related objectives – components², namely: (A): Institutional, capacity & network strengthening, which works towards developing capacities of civil society organisations and their participation in anti-corruption, as well as strengthening networks and coalitions for anti-corruption in Vietnam; (B): Public sector integrity, diagnosis & solutions, which contributes to the knowledge and evidence-base on (anti)corruption, and promotes tools and solutions to curb it; (C): People and youth engagement & support, which works towards building citizen knowledge and participation in anti-corruption, in particular by the youth; and finally (D): Business integrity, which works towards raising awareness and promoting participation of the business sector in addressing corruption. As such, programme target audiences are wider than in the first programme and include: government agencies, people/youth, CSOs, and business community.

While the full programme spreads over five years (2013-2017), operational planning of the activities in the first phase initially covers only three first years (2013-2015). The corresponding budget for this initial period is EUR 1,852,695, with work plans developed and updated on an annual basis. The four donors for the first phase are: DfID, Irish Aid, Embassy of Finland and DFAT (only for Business Integrity and Youth components). Financing is through a Joint Financing Agreement between the donors and TI. Formally TT has been contracted by TI to implement the programme, this due to the peculiarities of TT’s status.

² Plus, as mentioned above, a fifth component (E) REDD+Governance and Finance Integrity with separate financing; not part of this evaluation (also called Climate Governance Integrity in the programme document).

Operational planning for the last phase of two years (2016-2017) will be guided by the results of this evaluation. Financing for the second phase is yet to be secured; the proposed programme will in part be guided by the results from this evaluation.

2.3 Implementation Status as of 30 April 2015

A summary list of results and activities for the four components is given in Annex 4, with progress and budget expenditure to April 30.

Programme progress is relatively good and largely on track. Altogether there are 26 activities covering four components including one cancelled activity, of which 12 (48%) have been fully completed, 6 (24%) nearly (70-80%) completed, leaving behind around 30 % of activities to be completed in the coming time (to end 2015 or later). Thus, the programme progress is relatively good knowing that majority of activities has been implemented mainly in late 2013 and during 2014 and the fact that staffing issues have been basically improved only recently.

The programme progress has been somewhat uneven with A, C and D components being the most advanced, leaving component B lagging a bit behind the schedule (mainly due to NIS). The remaining activities requiring substantial follow-up attentions in the remaining time mainly relate to: CSOs/CSOs networks; fund-raising (Component A); advocacy on CPI/GCR/CPB, Transparent Town and follow-up works on NIS (Component B); collaboration with business schools to integrate AC education (Component D).

Budget adherence is acceptable. The balance unspent (28% of budget) is roughly equal to same percentage of the remaining number of activities to be completed (estimated around 30%), which would normally be sufficient to undertake the remaining activities in the programme remainder. However, the recent (unexpected) imposition of 10% VAT has de facto reduced the amount of remaining funds available.

Notable of course is the dominance of staff costs (including overhead), which prima facie is very high – although many activities are conducted by partners TT is in fact directly implementing the programme to a very large extent. There are also some apparent imbalances in the proportion of staff costs/overhead to activity costs – e.g. Component D has the lowest activity budget but the highest staff/over

3 FINDINGS

First overall findings concerning the programme are presented, followed by more detailed finding concerning the different components.

3.1 The Programme in general

The programme contains a fairly large number (more than 20) of main results and activities under Components A-D, several of which include a number of different ‘subcomponents’ and activities’ (Annex 4 lists the subcomponents and activities, and comments on progress). The Team has reviewed the regular progress reports and monitoring matrices for all and briefly discussed them with concerned TT staff, as well as with involved interviewees (for selected

activities), but has concentrated on the major activities and those that for various reasons been highlighted by interviewees, and which are of importance for the future. The Team finds that the progress reports do fairly reflect the actual progress, challenges, successes as well as instances where expectations have not been fully achieved. Implementation and evolving circumstances invariably result in plans having to be adjusted. The Team is of the opinion that this has happened no more than is normal in any big programme, even without taking into account the sometimes complex and unpredictable context of working with these issues.

Relationship between components and synergy

The Project document does not mention the word ‘synergy’, and there is not much discussion about the relationship between components except in very general terms, except that building up the capacity of TT and to a lesser extent of other CSOs should lead to better implementation of the activities and achievement of results under the other components. On the macro level, it is generally accepted that success in anti-corruption can only come from concerted efforts in many areas, working simultaneously with civil society, government, business and citizens/youth makes sense, since these have potential to interact positively with each other in promoting integrity. But the programme operates at the micro level through a number of discrete activities and results, most of which in practice do not relate in concrete terms, either because they concern different stakeholders, different localities, or have different time horizons for effect. There are however some instances of relationships at this level, for example some outputs from the NIS study are or can be used at starting points for discussion of reforms in the judiciary, and inputs to legal drafting comments, priorities for business integrity etc. But this is more outputs from one activity used as inputs in another, very positive and efficient, but not synergy in the sense of increased effectiveness through combined action towards another result.

3.2 The 2013-2017 programme – strong points

The current programme has to be seen in the context of TT’s development. The programme in the previous programme was geared to supporting the establishment of TT, learning the environment and subject areas, and developing contacts with Government, civil society and other stakeholders. The current programme is about attempting actions ‘across the board’ in various areas and of different kinds, as well as continuing to build TT as a sustainable organization. This is a valid and understandable approach, as success in anti-corruption and integrity requires actions in many areas. Furthermore, it is difficult to predict without trying what will work and what will not work in the Vietnamese context, how fast one can progress and how much space there actually is to act.

The four components and their goals are all **relevant**, as well generally the constituent subcomponents, as reflected in positive opinions on importance and usefulness from the respective stakeholders and partners. If TT were to concentrate, the opinion is that all the components should be kept, and instead the number of subcomponents and/or activities reduced.

The programme document contains a quite detailed discussion of the choice of goals, expected results, relevance and suitability to the current challenges of addressing corruption in Vietnam,

based on experience from the previous programme and research. The interviews and various reports confirm that these are still valid. TT has made some revisions where in fact some results/activities were no longer relevant due to changing circumstances during implementation.

Similarly based on a still valid discussion in the programme document, the outputs and activities are per se consistent with the goals and objectives. However, in the reporting and the monitoring matrix it is not made clear the relative importance and priority of the different outputs and activities.

The project partners selected to jointly carry out different parts of the programme have generally performed well, and are appropriate and relevant as evidenced inter alia that most conduct substantial other activities in related fields consistent with their specializations and have good professional reputations³. There have been difficulties in finding sufficient qualified national consultants for research type work, but these are subcontractors, not partners.

It is a bit difficult to say how efficient the implementation has been since many of the activities are new, at least in Vietnam, and there are limited comparisons for costs. However, **time efficiency has been quite remarkable**, and even more so considering the special challenges and sensitivities, in for example forming the OGP group, in setting up and starting up an operational ALAC. Even the process of creating a VNGO, although slow and arduous in absolute terms, has in relative terms progressed rather well. All told, even if including (as is done) the very substantial costs due to the significant involvement of TI-S staff (because of the indirect financing arrangements and the current peculiar institutional setting, but mainly for capacity building of TT itself⁴), **cost efficiency of the programme seems reasonable**, especially considering that many activities are pilots or more or less untested and innovative approaches. The flip side is that the support cost (mainly TT staff salaries) per the still small number of ultimate “beneficiaries” so far is rather high. But these support costs are not pro rata proportional to the number of beneficiaries -there are economies of scale. With replication and/or wider reach the cost efficiency will automatically be even better. Nevertheless, the Team is of the opinion that **internal cost efficiency** in TT may be less than optimal. How much less is difficult to say, as TT does not currently have the ‘real time’ staff time and activity and overhead cost tracking management systems required to assess efficiency. Can one say that the programme (so far) represents “good value for money”? Potentially yes if the programme is considered as an ‘investment’ that may very well result in significant outcomes if and when proven activities are scaled up or widely replicated.

On the whole, the planned activities and outputs have been delivered on time and within allocated budget. In some cases there have been delays and extra costs, but with one or two exceptions (NIS in particular, but even this can be seen as learning by doing), no more than can be expected in a complex multi-year programme, and these have not been related to the

³ See further the separate Stakeholder assessment.

⁴ According to guesstimates by TI-S, of total TI cost (about €100 000 per year, or 16% of the total budget), something like 75% is for capacity building and 25% is for transaction costs related to the financing arrangements and administration.

relevance or importance, rather the opposite (i.e. difficulties in progressing due to external and internal factors). See also Annex 4.

With regard to **effectiveness** and achievement of objectives, it is too early to say as several major activities are not yet completed (Transparent Town, ALAC, NIS) or operational activities have just started (ALAC) or not started in earnest (OGP). But there a number of indications – such as interest from new stakeholders in joining or replicating, continuing audience interest on social media, coverage of events and communication of TI products - that for example the various business integrity initiatives and some of the youth initiatives and awareness activities have been effective in the short term.

Constraints due to the political context

The Party and Government continue to recognize that corruption is one the most pressing issues in society, that it still remains a challenge, and that broad-based efforts are needed. There is thus space to speak out and act for individuals, media, and civil society, but respecting the from time to time varying perimeters and agendas by the authorities, and using circumspection in addressing ‘sensitive’ issues, especially if in the public arena. In these respect, an organization such as TT should, to quote one of the interviewees, keep in mind four points: obey the laws of Vietnam, be constructive, work together with government organizations, and be patient. The challenge for TT is to interpret this in each concrete instance, as much is unsaid and it may be difficult to gauge the actual degree of sensitivity beforehand.

The programme was carefully designed to operate within the above context, and the fact that planned results by and large have been or are being reached shows that there is considerable space to act. The programme activities have been implemented quite skilfully in the context of this complicated operating environment .TT has creatively and constructively reacted to signals of sensitivity and adjusted work without losing the content essentials, for example in handling of the sensitivity of the report contents from NIS and Transparent Town, and the adjustment of the VIA concept from a free-standing entity to a grouping under the official Vietnam Business Forum. On the other hand, the barriers to publishing in full or more widely for example the detailed NIS report - considered sensitive – do limit its intended effect as a means to boost advocacy and wide-spread consensus for more holistic action. Similarly for the detailed analysis done under the TT project – the scope for others to learn from the detailed work done is limited if the detailed analysis reports are not shared.

There has not been any overlap with other development partner programmes, and while there has really been any formal cooperation and collaboration, there have been regular contacts, exchanges and participation in common meetings, in particular with DfID and World Bank. Indirectly through activities with CSO partners, the programme has worked a little with projects financed by other development partners and this has been judged positive by the partners.

With regard to effectiveness in the longer term and **sustainability** of results/outcomes it is not possible to say anything with certainty at this stage, except that they are by and large not yet plausibly ensured - or rather envisaged - in convincing scenarios. Be that as it may, this cannot

be ensured by TT alone, given its limited staff and – in comparison with potential needs – limited financial resources. Significant **impact** at national or even local level cannot be achieved without large scale replication or much expanded leverage through partners and other stakeholders. So far, all has been small-scale. Again, it is too early to say anything at this time about key **outcomes**.

The programme is designed as a rather typical all-inclusive and static donor programme, quite understandably, as this packaging has arguably been necessary for smooth joint donor financing via TI-S and formal contracting of implementation from TI to TT. There is a well-designed monitoring system also testing KPIs from this year. Reporting is clear and comprehensive, and to the satisfaction of donors and TI (according to interviews).

3.3 The 2013-2017 programme – weak points

But this model is not well suited for the future, for several reasons – changing donor and funding landscape, sustainability and independence of TT and/or its VNGO ‘avatar’. It puts key permanent mission activities, ‘project’ type initiatives, internal organizational and overhead activities, and longer term organization development in the same package, all folded in under four components. This makes it more difficult to separate external and internal activities and costs, indirect (overhead) and direct activities and costs, important for efficient management but also for donors who are usually very parsimonious with supporting overhead and internal core costs, especially if they seem very high. Or in other words, means and ends are not well separated.

The Programme consists of a large number of rather disparate activities. Many of the interviews – from all types of stakeholders – do feel that the Programme has not been focused enough, trying to cover too many things rather than fewer more thoroughly. TT has arguably had too high ambitions and also been overoptimistic in estimating the time and effort needed for some activities, resulting in a too wide dispersal of TT resources, particularly staff time and attention. This of course is partly a reflection of the programme design.

At least in hindsight, one can for example question the ambitious attempt to try to implement the whole NIS at once, rather than first testing one or two pillars. These are also questions of cost efficiency and also perhaps also effectiveness, and also illustrate the challenges of TT managing ‘heavy’ research.

While not putting all eggs in just a few baskets is understandable in the context, the programme lacks clear priorities and exit strategies for underperforming activities, as well as roadmaps (business plans or scenarios for financing and implementation) to achieve large-scale replication and sustainability in case of successes (particularly critical for Transparent Towns and ALACs). Maybe partly for this reason, there has - at least until recently - been inadequate follow-up on many a priori potentially promising activities, particularly with regard to youth activities where creativity and variety has been impressive but the question of ‘what next’, i.e. how to capitalize on achievements has not been given enough attention.

The programme design –being based on assumptions of firm multi-year commitments from a dependable group of donors - cannot handle variable and uncertain funding levels from year to year, which is the more likely environment in the future.

Risk analysis is partial and not very deep, and risk management is not well documented. This is also an example of TT lacking systems (as opposed to informal procedures)

3.3.1 MEL framework

The MEL system is good with respect to monitoring and reflects well the output and immediate outcome progress. However, the programme document argues for setting ambitious targets, and it is expected that all cannot be met, but that these will then become learning opportunities. This complicates the interpretation of achievements and performance using the indicators and targets. The evaluation aspect is not very visible in the written documentation. There are no in-built internal final mini-evaluations of key subcomponents (which to be fair reflects their absence in the programme document), only the external mid-term and final evaluation –which cannot fully replace more detailed internal final ones as part in internal learning process. There is learning at TT, but it is not systematized within the framework, and there is no specific discussion of lessons learned in the progress reports, although both TT and donor stakeholders stated that progress is assessed and lessons learned discussed in some detail during the 6-monthly donor meetings.

3.4 Component A – Institutional, capacity and network strengthening

3.4.1 Result A1 –strengthened networks and increased participation of CSOs

TT has been quite active in trying to get CSOs to come together and work together on anti-corruption issues.

The main achievement has been the forming and launching of the Open Governance Partnership (OGP) initiative, to advocate for Vietnam joining the OGP. While this may or may not happen in the medium term future, the fact that an initial group of 9 CSOs and individuals has been formed (with TT as chair) and has developed working procedures and an advocacy plan for working together is an ‘immediate’ success in itself, considering that this type of working together by CSOs is rather new in Vietnam, and has been in the past proven difficult to set up. Nevertheless, the process has been quite rapid, detailed work starting in earnest only in mid-2014: efficient and effective so far. The challenge now is to keep up the momentum, that adequate human and financial resources from members (and/or TT) are secured, and that members actually deliver on agreed plans.

TT staff has also participated in various regional and international events and exchanges and supported participation of partner CSOs in some of these for learning and experience exchange. Furthermore, as evidenced by the interviews, TT has generally been very forthcoming and willing to respond to requests for participation in and to speak at events, discuss more informally and/or give advice to when asked or contacted. This can be seen as part of ‘normal’ core business.

Reactivity is thus good, especially with established partners and stakeholders, but proactivity perhaps less so. A large number of interviewees from all groups of stakeholders - government, civil society, donors, youth and business (to a lesser extent) - remarked that TT seemed somewhat to keep to itself and not reach out enough to other organizations, at least in the sense of making general contact, explaining what TT does and what TT does not, what TT has to offer, and how TT could potentially assist. While recognising that TT has and does maintain very good relations with the current stakeholders and partners, it was felt that this was a much too small number compared to the potential relevant stakeholder populations, CSOs in particular, but also in government and business.

3.4.2 Result A2– enhancing TT capacity

A number of activities have been undertaken to increase TT's capacity to deliver. Inter alia, the staff situation has much improved and stabilised with compared with 2013 and even with 2014. There is now an adequate number of well-qualified staff covering the components as well as cross-cutting areas such as communication, a performing management team, and low staff turnover (at least for the time being). TT has through the experiences from the earlier staff turbulences now in place a well-performing recruitment procedure to ensure that the right profiles are recruited. On the individual level, capacity building has focused on increasing staff knowledge and understanding of anti-corruption and integrity and how to work with these issues. Key staff have attended international & regional workshops and meetings to broaden their exposure to international experience and for networking. A staff capacity workshop has been held to identify needs, resulting in various initiatives such as brown bag lunches on various anti-corruption topics. There have been quite frequent contacts between TT and TI-S staff for advice on various questions, both operational and substantive, and these have been judged valuable by TT staff for improving knowledge and getting concrete advice based on TI's global experience. A new improved website in 2014 has improved TT's visibility with doubling of the number of visits.

All the interviewees considered TT to be highly professional, technically competent and well run organization, with qualified, committed knowledgeable and helpful staff, and with high credibility, expertise and quality work in the areas of integrity, transparency and anti-corruption well-calibrated to the Vietnamese context (both directly and as conduit for TI's global expertise). And TT is also very skilful in handling the sensitivity of these subjects and activities in a constantly evolving and not always predictable Vietnamese environment. In short, by and large, most interviewees consider that TT is doing the right things right.

The Team also shares the above assessments from their own observations. The association with TI, the 'brand' as well as its resources, is - as can be expected - considered a very strong advantage, and a major component of TT's strength, especially when TT manages to 'localize' international practice and knowledge. It is also an added assurance for donors, as the backing and support from TI obviates more extensive assessments of TT and its programmes that would be required if TT were a stand-alone local organization.

Judging from staff interviews, TT is considered to be an open and generally transparent organization with good working environment and relations, encouraging discussion, exchange

and learning, both individually and organizationally. It has successfully managed a period of high staff turnover and change of leadership.

As far as the team can judge from own observations as well as interviews, TT does generally apply the principles, policies and practices of “good governance” in NGOs to high standards. But these have not yet been adequately formalized as a system.

TT is still a relatively new organization and its staff (regular and staff consultants) has grown significantly to about 16 since the start of the programme. In addition there are some volunteers involved with different youth activities. TT is now at a stage in development and size where the more informal and oral ways of working will no longer be adequate to ensure sustainability and full autonomy. The Operational and personnel procedures manual from early 2014 (but still not fully complete) is an important step to becoming more systematic, but it only covers administrative matters.

Overall staff numbers are seemingly high, but given the number of components and activities, the actual number at the operational level is typically one senior officer and one assistant, supervised by a member of the management team. Although this is an improvement from before, the institutional backup still seems rather limited, and it is not clear how institutional memory is adequately ensured if one or more key operational persons leave. This is especially important if the management team does not have specialized knowledge or experience in some areas where TT is conducting significant and complex long-term work (e.g. local government in Vietnam, legal sector/ALACs or research management).

In hindsight at least, as already mentioned and echoed in interviews, there is a case that TT has been too ambitious and spread too thinly, not focusing enough, and sometimes underestimating the amount of work actually needed, and not having enough time to follow up thoroughly.

Regarding TT as a ‘research’ organization, opinions were divergent, some saying that TT did not have any comparative advantage in this respect and should let others take the lead; others saying that well-focused research enhances credibility of TT advocacy and advice, as well as contributing to more effective actions.

Regarding internal organization, the Team finds that the management setup of Component A is not clear cut, with the Head of Finance and Administration being the nominal manager, but many of the activities actually under the responsibility of the ED. This reflects the heterogeneous nature of the Component, with strategic activities (OGP, TT governance and viability) combined with significant logistic activities such as events, exchanges, workshops. The Component is a bit artificial.

Issues with delays on administrative matters, particularly contracts, were raised in many of the staff interviews, delays within TT as well as with responses from TI-S. Although the situation has, it seems, improved compared to before (both in TT and in TI-S), the Team finds that the smooth integration of decision and processing delay requirements and constraints, distribution of work load over time and between the administrative and financial unit and components are still areas for improvement. Delays due to lack of delegation of authority in TT during absences

have also been noted. Otherwise, the working relations and interaction between TT and TI-S have been good, as evidenced in the interviews of both TI and TT staff and management.

Support from TI-S has been both administrative and on capacity building and ‘hand-holding’ so to speak, and this has been appreciated by TT.

3.4.3 Result A3 – enhanced governance structure and financial viability

VNGO status

Everybody agrees that the current set up with TT as a non-profit company and just a “contact point for TI” is transitional. The process to set up a VNGO under the umbrella of VUSTA has just recently come to fruition.⁵ Being a VNGO under VUSTA has advantages but also constraints; only practice will tell how much flexibility the local VNGO will have in terms of programmes and activities. In any case, the thinking is to keep TT as such in parallel, at least for the time being.

Although a lot of work and thought has been given to the creation and organization of the VNGO, as far as the Team understands, thinking and analysis on how the dual setup would function operationally is still at an early stage. And the answers to the strategic and non-trivial questions – what would TT do and what would the VNGO do, how they relate, how staff is distributed between the two entities, how donor and other financing is channelled etc. are also still be worked out.

Financing

The Team finds that TT has been too complacent about the prospects for continued traditional donor funding, even in the short term 2016-2017.

Of the current donors, DfID is withdrawing from Vietnam as of mid-2015; DFAT (Australia) may not be able to provide further support due to big aid budget cuts globally – this should become clearer by September, but the indications are “not likely”; Finland’s new Government only last month decided to cut its overall aid budget significantly with immediate consequences for funding prospects 2016-2017⁶ (and in any case Finland is winding down in its aid programme in 2018). Ireland has indicated that it is interested in continuing support, but can now only commit for one year, while waiting for their new 2017 programme – which should be known during the first quarter of 2016. Belgium is prepared to come in as a new donor. Neither Ireland nor Belgium currently has phasing out plans with regard to CSO support.

It is not that the Embassies in Vietnam do not appreciate TT and the programme, or that they are per se not willing to continue support; cuts are consequences of larger home government decisions. TT may not have followed these debates (nor been alerted by TI-S), but perhaps relied too much on the local donor counterparts’ positive attitude.

⁵ But the parallel process to register TI as an INGO with PACCOM still on-going.

⁶ The current 2015 call for CSO funding may be the last one, and it may be difficult to keep the previous support level.

Although TT recognizes the rapidly changing donor landscape and funding challenges and has started to reflect on alternative ways of funding, particularly from business or through commercial services, this is still at a very initial stage.

Responsibility for fundraising is currently divided between the Executive Director and the International Advisor, and additionally with TI-S deeply involved. TT does not have any professional fundraising staff

This is particularly noteworthy since as described above, adequate funding from traditional donor is far from assured at hoped for levels even for 2016 and 2017, and the lead times for engaging significant resources from completely new non-traditional donors or other funding sources is typically a couple of years, and requires lots of sustained work.

The road to TI chapter status

Given all these uncertainties and challenges, it is not possible to say anything at this time when a fully accredited sustainable independent TI chapter could be in place, nor what its expected size and budget could be. And even less when it could become an "ideal" chapter, with a significant number of members and advisors openly declaring themselves as such, which additionally depends on the 'space' available. Only that a lot of analytical and organisational groundwork remains and much has yet to start.

3.5 Component B – Public sector diagnostics and solutions

3.5.1 Result B1 – high quality evidence base widely available and used to identify priority areas for advocacy

This component covers supporting and monitoring UNCAC implementation, and sharing findings of CPI and other TI/TT 'products'. Work on supporting UNCAC second round review was postponed since the timing of the review was not known. However, GI was happy with TT's previous support, and has indicated that this is an area where TT's inputs in 2016 are very welcome.

The CPI has of course been followed in Vietnam through the years, and has been increasingly referred to in media and by Government in general, as well as by GI (including the methodology). The launch by TT of the CPI, in 2014, attracted a lot of media attention, much more than in previous years, as well as attention from the Prime Minister.

The CPI and to a (much) lesser extent the GCB (for which TT conducts the Vietnam surveys; the next one scheduled for 2015) are known or used by a wide range of TT stakeholders as per interviews; other products much less. For example, the YIS conducted in Vietnam by TT was mentioned only few times.

3.6 Result B2 – Key anti-corruption policies and institutions strengthened through technical advocacy, technical advice and solutions

3.6.1 Result B2.1 – using the findings of the NIS study to promote improvements in policy and practice

Implementation of the NIS study has been difficult, resulting in significant delays; the study is still not fully finalised. The amount of overall effort required, the amount of TT direct involvement, the problems in ensuring quality of research work and in finding good consultants/researchers to do the field work, the complications due to sensitivity of findings (and resulting constraints on publicity and dissemination) were all significantly underestimated. There also seem to have been quite different expectations from stakeholders (e.g. giving a whole balanced picture or presenting ‘new’ findings and recommendations).

The assessments of the quality and usefulness of the NIS (so far) by relevant interviewees vary quite a lot, from good to not so good, from useful to not very useful, from little added value to useful summary overview. This perhaps reflects the different expectations. The Team has not had the opportunity to read the report, so cannot have any independent judgment on the quality and pertinence of the findings and recommendations. In any case, even if NIS (so far) may not have had the hoped for external results, it does seem to have been a good learning substance-wise internally for TT staff, and helped to inform planning and orientation of activities for 2015. It has also been the starting point for a workshops and report on judiciary integrity together with IPL, and inputs to other workshops on business integrity (under Result B2.3).

Although a quite a lot of work was done to adapt the NIS model to Vietnam’s situation, it still seems less than optimal. In hindsight, it would have been more prudent - and arguably more cost-effective – to have pilot tested one or two pillars instead of immediately launching the full study, in order to see how ‘sensitive’ the results and recommendations are considered to be, to what extent they can publicized, and if and how they can mobilize stakeholders to implement or do advocacy for implementation in the corresponding area, compared to more ‘conventional’ approaches. Testing with just one or two pillars is feasible since the bulk of the research on each pillar can be) conducted independently, and the results can also be used just for the corresponding area and stakeholders.

The holistic assessment has value in itself, as it puts all recommendations in perspective and together for increasing integrity across the board, but perhaps more important as means to create consensus and momentum among a wider stakeholder group (and the public) for concrete action. If dissemination of the report, its conclusions and recommendations are restricted due to ‘sensitivity’ of some parts, this becomes more difficult to achieve, and the value of the exercise is less. However, this activity is not yet finished, and how the NIS is best publicised to best effect given the restrictions is still to be worked out. It could also be possible to work pillar-wise as has been done for the judiciary pillar, gathering just the main concerned official stakeholders to discuss what can be done concretely in the area based on the pillar

results. A more definitive assessment will thus have to wait until the end of the 2013-2015 period.

3.6.2 Result B2.3 – Providing on going technical support to key legislation etc.

This includes inputs to the annual ACDs as well as inputs to law drafting. The latter have only recently started in cooperation with IPL, with inputs to the drafting of amendments to the penal code that relate to anti-corruption. Work is also starting to prepare for inputs to the 10 year assessment of the Anti-Corruption Law and the Draft law on access to information. These types of inputs are appreciated by GI and increasingly by the drafting committees (who traditionally have not been that receptive to inputs from CSOs). One cannot perhaps expect major results of such advocacy, but there may be some, as seems plausible from experience in the previous programme with somewhat better protection of whistleblowers in the law on denunciation. Be that as it may, if improved laws are well implemented, this becomes a very cost-effective way of achieving impact at a larger scale.

3.6.3 Result B2.2 - Piloting local tools for increased accountability and transparency

The “Transparent Town” model developed in Slovakia has been adapted to the Vietnamese context and is being piloted in Ninh Thuan province. Actually, it could more accurately be described as ‘Transparent management areas’ at provincial level (rather than at town, i.e. district level). This started with a very wide-ranging assessment of numerous procedures (180 in all) in five overall management areas considered to be corruption risks. A large team of consultants (at the end 10 in all) was mobilized to conduct the assessments, which has resulted in a substantial and detailed report. However, action on recommendations will it seems be carried forward, at least initially, only on a subset of these: the areas of policy supportive of business development, PAR; and land management, especially master planning. Implementation of these is planned to take place during the rest of 2015, so it is too early to say anything about results, except that it so far seems promising, with good cooperation and interest from NinhThuan.

Ninh Thuan has indicated that it intends to implement recommendations in the remaining two areas (public assets and recruitment of civil servants) later in a second phase. If they do so within a reasonable time frame (say in 2016), with or without support from TT, then the pilot can be said to be fully successful, subject to positive evaluation feedback from citizens, businesses and other beneficiaries.

3.7 Component C – People and youth engagement

3.7.1 Result C1 – Increased understanding, support and engagement in the fight against corruption, particularly among youth

TT has launched or supported in partnership a number of innovative events and initiatives, that on the immediate level have by and large been successful, in the sense that there have been an encouraging number of participants and followers, positive regular and social media coverage, and engagement of some youth for more sustained work with or without support by

TT. These include Integrity Me Contest (IMC), Youth Box Online Channel (YBO), FACE Club at Hoa Sen University, Humans of Integrity, and Taxpayers View (TPV) Contest.

They are variously one-off events (IMC, TPV) or ongoing activities (YBO, FACE). For the former, the challenge is follow-up, how to capitalize on the otherwise ephemeral interest, and what to do next. The capacity and resources in TT to do this has been limited, and sometimes a bit overstretched. Without more sustained and systematic follow-up and/or scaling up, the effects are not sustainable. For the latter, the challenge is to ensure continuity as volunteers come and go. In the case of YBC, TT has had to restart it and also be more active in support. Again, it is difficult to see how such otherwise promising activities could continue without at least some outside support, either by TT or a partner.

A common challenge for all is the still very small scale. For example, the quite active FACE Club integrity group at Hoa Sen University consists of only 13 students, and the participants at events are around 100 (although Facebook followers are a couple of thousand). But Hoa Sen University alone has 10 000 students and 500 faculty. So far insufficient thought has been given to how to scale up or replicate at larger scales through CSO partners, government and other stakeholders, without which for sure no significant outcome or impact is possible. To be fair, one can say that these are pilots, and that TT may not be in a position yet to sponsor campaigns or events on large scale, and needs to be somewhat prudent as these may be considered controversial.

Working with youth is challenging on several fronts, in finding the right channels and the right messages, in constantly coming up with new ideas and events to keep attention, and in ensuring continuity and sustainability. The need for awareness raising among young people is still very great, as is confirmed in the draft 2014 YIS report: 75% of youth say have little or no information; among the least educated only 12% of the least educated had some or a lot of information, while the corresponding figure for the best educated was 42%. So far the programme has targeted the best educated (and informed) group, largely university students.

Awareness raising is close to never-ending, if only because the individuals in the youth target groups rapidly change. If one targets the 18 to 25 age bracket, 12% will be new every year and would need to be exposed to the basic messages. And at universities, the turnover would be more like 25% per year. A way to address these challenges could be to have a mix of 'standard' more or less stand-alone one-off events and activities but repeated periodically; continuous activities such as FACE; and others consisting of a succession of related events and activities building upon each other. To some extent, this is what is done, but perhaps not articulated as effectively as possible.

Perhaps now it is the right time to review all the activities done to date in the light of the above observations in order to guide TT's work on youth from now on, aiming at scaling up and taking over by TT's partners?

This result area also includes cooperation with universities (and in the future perhaps also high schools). In particular, the cooperation with the private university Hoa Sen in HCMC in connection with the FACE Club and awareness activities regarding exam cheating as an issue of integrity has encouraged Hoa Sen to try to launch integrity in education network in Vietnam.

An initial conference was recently held gathering some 14 public and private universities to discuss this, a first. These types of networks exist elsewhere, including in China, and seem to be useful vehicles for integrity training, research, awareness raising and advocacy at a larger scale, so this is an interesting development. TT is also working with several other universities on integrity initiatives and collaboration.

The second Youth Integrity Survey has been carried out, and the report is available, after some delays. But the official launch is still to come which are to be followed by a YIS advocacy campaign later in 2015. The fact that this new YIS has not yet been publicized may be part of reason why only a few stakeholder interviewees mentioned it.

Concerning feedback from stakeholder interviews concerning youth activities, the youth in particular thought that TT was not sufficiently attuned, that its web site was not updated often enough, that there was not enough activity in the Facebook site, and more generally that TT needed to have simpler, more fun messages to convey integrity, and also try to reach many more young people.

3.7.2 Result C2 – Victims and whistleblowers of corruption find more effective solutions to their grievances

This covers the development, start-up and support to a pilot ALAC - Advocacy and Legal Advice Centre in Hanoi, in cooperation with VIJUSAP (who also runs a number of ordinary centers offering free legal assistance to the poor). ALACs have been implemented in many countries and are an enhanced version of legal advice centers, focusing on complaints related to corruption and whistleblowing, but also actively enabling people to report and resolve their cases, including outreach and awareness raising. This activity has just since less than two months entered in the operational pilot implementation phase due to run for eight months, but is already handling several real cases. Actually coming this far in 2 years is an achievement in itself, since this a new concept in Vietnam both for the public and for Government agencies.

TT is putting a more staff effort than initially estimated into supporting the pilot implementation and seems in practice to act as the operational project manager (rather than VIJUSAP). The pilot period seems a bit short, unless this is considered a first taking stock period, to be followed by adjustments and further fine-tuning.

ALACs have shown their usefulness elsewhere, so this is highly relevant and promising activity with clear potential, though still to be proved and perfected as a model (which is the goal of the pilot). However, this does not automatically prove the feasibility of a large scale replication. ALACs do not have much economy of scale, as centers Advocacy and Legal Advice Centre (even if complemented with mobile clinics) need to be close to target group neighborhoods and probably cannot each become too large. Given that sustainability and significant impact will ultimately depend on substantial initial investment as well as recurrent operating cost, underpinned by a an effective support and monitoring function, one could have reasonably expected that TT had already made ex ante a robust options and scenario

study for large scale rollout already, in order to also estimate the need and scale of continued TT support.

Originally, the involvement of TT according to the programme document was only to identify a suitable partner and help with the model. But 2014 TT in agreement with the donors decided to support a pilot, perhaps in implicit recognition that the process has to be accompanied to ensure ultimate impact and sustainability.

ALAC can hardly be considered part of TT's core business, so identifying how and when prime implementation and operations responsibility can be handed over to other partners is key. VIJUSAP is a new organization with still limited staff and capacity, and already runs other centers, so would not yet – and not for several years - in a position to take charge of a major programme.

3.7.3 Result C3.1 - Supporting pilot innovative initiatives using ICT and social media

This is a web platform called toidibehnvien to help achieve more transparency in public services (hospitals in this pilot). It is ready for piloting, but this has yet to take place. According to TT it has received positive feedback and interest. But, as TT also recognizes, it is a standalone with little synergy with other activities, and it is questionable whether it should be continued by TT rather than by somebody else. This could be seen as an example of lack of prioritization, too thin spread of resources and/or lack of comparative advantage in IT projects. And in fact TT has handed it over to the partner who will take responsibility for it in the future.

3.8 Component D – Business integrity

This includes a range of bigger and smaller activities, the most important ones being support to SHTP on collective integrity action by industrial park member companies and the creation of the VIA, now for pragmatic reasons rebranded and transformed into a working group under the Vietnam Business Forum and VCCI. Feedback from reports and interviews are very positive on both, and although they are still under development and implementation, there seems to be potential for them to become to some extent effective in collectively in promoting higher standards and adherence to integrity, a plausible hypothesis as there are both push and pull factors, push being the necessity for foreign companies to follow the USA Foreign Corrupt Practices Act and the UK Bribery Act themselves but also in relation and with their local business partners and subcontractors; pull in that industrial parks are competing for attractive investors to set up shop and a better integrity environment can be seen as an added attraction. Another indicator is that other industrial parks have expressed interest in setting up similar integrity schemes.

While partners were very satisfied with TT support so far, and their skill in constructively bringing together the various stakeholders, even more assistance in developing and localizing concrete tools and materials would help speed up implementation, in the form of toolkits and templates for setting up and running working groups, for defining, assessing and monitoring member firms commitments and implementation and similar.

TT has also conducted a variety of smaller activities with chambers of commerce, company compliance managers and also with universities/business schools. While many of these can be

categorized as networking and awareness raising and preliminary identification of possible partner collaborations, it does lead to dispersion of attention and resources. It is difficult to see any guiding priority in the selection of these. That being said, both TT and interviews agree that there is high interest in and potential in increased focus on business integrity. In addition, the prospects of funding of initiatives by business, either in parallel to or through TT, are good and relatively easy to secure.

3.9 Communication

Communication is of course of key importance for an organisation such as TT, for advocacy, for awareness raising and for dissemination of knowledge and tools, and to navigate around sensitivities. It is both a core staff function and an essential element in all components and activities. TT now has a dedicated communication officer and assistant, which has put TT's communication work on a much more solid base, with definite improvements in messages, publications and materials. However, a detailed and comprehensive communication strategy has yet to be developed.

As mentioned earlier, there is an expressed desire for better, lighter and humorous general messaged targeting youth, and more dynamic and attractive website and Facebook pages. Depending on activity and context, TT highlights 'anti-corruption', 'transparency' and/or 'integrity' as the focus and objective. But it is not clear to the Team that there is a clear strategy on when and why one or other of these terms should be used, nor indeed if others that also relate to these concepts could also be fruitfully employed (e.g. honesty, ethics, impartiality, fairness, quality of government), and how they are expressed maybe differently in different Vietnamese contexts to different target groups. In connection with the preliminary research work for the Transparent Town project, considerable effort was made to define in practice what 'transparency' meant in different procedures and management areas. A lot of this basic work of practical concept definition and dissemination could very well be done by TT as part of core activities.

As mentioned elsewhere, TT has been very nimble in judging what actions are feasible and in what form, but this perhaps for understandable reasons is not always spelled out. However, this begs the question of where in the 'comfort zone' in relations with government counterparts TT is positioned. Can TT in some cases be somewhat more insistent or persistent? Or to quote, be a bit less "patient"? TT's thinking and reasoning in this respect could be more clearly communicated and elaborated to TI-S management.

As evidenced by the wide-spread opinion that TT does not reach out enough, there is a lack of communication to various stakeholders of how TT engages other actors, and reflection on how TT should best approach and communicate with a much wider stakeholder population.

Explaining the change in status from company to VNGO, name changes and 'rebranding', as well the relations between two coexisting entities will also need a well-thought out communications strategy. The effectiveness of fundraising from non-traditional donors and sources also depends on a well-tailored communication targeting the interests and priorities of these.

The Team finds that that so far not enough attention has been paid to strategic communication compared to component activity-related communication.

Media contacts

TT has established contact with a number of actors and journalists in print, web and audio-visual media. Partly with the help of these, media coverage of TT events and supported activities has increased and in some cases been quite substantial. But TT seems to consider media and journalists as conduits for messages rather than partners, according to some interviewees. Some also thought that TT did not do enough proactively to be in the media, through think pieces, “op-eds” and articles. It is possible to reach out and establish contacts with to a large number of journalists (and others) with comparatively cheap means, through seminars and workshops and especially social media (Facebook) as the Centre for Media In Educating Community (MEC) has demonstrated through Facebook groups with members in the tens of thousands rather than in the thousands.

4 CONCLUSIONS

TT has established itself as the leading organisation in Vietnam working widely on transparency, integrity and anti-corruption, and in many eyes, the only one.

TT has achieved a remarkable level of professionalism and credibility as an organization and also so far skilfully implemented the programme, producing many encouraging and interesting outputs, some evidence of (modest) results already with due consideration given to the fact that most activities are far from completed, and tentative promises of longer term impact and sustainability, all the while with due consideration to sensitivities and the acceptable space for action.

Programme progress is relatively good and largely on track, and budget adherence is acceptable. Implementation has progressed as well can be expected with programmes of this type and environment. Relevance and usefulness is manifest; efficiency has been acceptable, though not optimal; effectiveness as far as can be adumbrated is promising. Sustainability and impact of results are not so far ensured within the programme, nor is sustainability and autonomy of TT itself. The MEL framework is good on progress monitoring, less so on evaluation and learning.

Notwithstanding, TT has by and large been doing the right things right up to this point.

However, successful as it is, both TT and programme design needs to evolve significantly in order to ensure sustainability both of results and TT as an organisation in the medium term future.

Securing adequate financing is critical, even in the short term (2016-2017). Traditional donor sources are rapidly diminishing and the lead time for engaging new funders is long. If TT does not rapidly allocate significant time and staff to fundraising as a priority, survival of TT is at risk.

TT needs to become more systematic in management and operations, in order to maintain and increase efficiency in a more difficult funding environment and with less support from TI-S.

For sustainability of results and larger-scale impact, programme design has to take better into account the prospects and options for scaling up and replication beyond the period of direct involvement of TT. With the possible exception of general awareness raising (e.g. around CPI) and advocacy to government (e.g. for improved laws), TT is too small and will probably never have the space to be a primary actor in implementation that can potentially have significant national impact. Of course, not all results need upscaling and replication for nationally significant impact, but many, maybe most, do. For example, a single (pilot) ALAC, however successful, will have zero impact on anti-corruption practice in the country, while a network of effective ALACs in all provinces does have the potential for significant impact.

A sharper prioritization and fewer but ‘deeper’ (i.e. covering more localities and/or beneficiaries; or involving the whole chain from output to significant impact) activities will increase efficiency and (probably) effectiveness of the programme. More concrete synergy in activities could also increase effectiveness, and at the same time lead to more integration between components. Concrete synergy is manifested through activities being implemented at the same time in the same place and involving stakeholders and beneficiaries from different components, and outputs complementary in contributing to a common result.

The changing funding environment requires changes in programme design, for example a modular programme design that allows for ramping up or cutting down on activities as a function of increased resource variability in the future, without destroying the coherence and effectiveness of the programme.

The complexities and practical considerations in migrating partially or fully from company structure to a VNGO are considerable, organisationally, operationally, financially and funding-wise. They require thorough study and weighing of options, and careful implementation. Furthermore, how effectively the VNGO can operate under VUSTA remains to be seen; only practical experience will tell. It may be too optimistic for all this to be achieved by the end of the programme.

5 RECOMMENDATIONS

Most concern the road to future TT autonomy and sustainability which the Team considers to be the most critical part for the second phase of the Programme.

TT autonomy and sustainability

1. TT to as high priority recruit or attach a professional fundraiser, preferably full-time, and clearly vest primary responsibility for fundraising with one person within TT. As a priority contact all EU member embassies (and the Delegation) as well as all non-traditional donors in Vietnam, trade missions, big audit companies, big international companies and foundations. Also explore the possibilities of offering commercial advisory services and facilitating stakeholder/partner financing (i.e. not going through TT/TI). To quote a donor representative, “life will be short if TT depends on donors”.

2. But, if possible, continue to use the advantage and convenience of indirect financing via TI despite the rather high transaction costs until significant non-traditional sources are secured and TT and/or its VNGO alter ego are sufficiently strong to pass on their own the capacity assessments and systems audits normally required as 'due diligence' of new organisations seeking funding. It is not obvious that the VNGO will be able to automatically transfer and retain the reputation of TT in the eyes of funders.
3. TT starts to define and document systems for all important processes. This will ensure institutional memory, backup in case of staff leaving without adequate handover, facilitate training of new staff, allow more rigorous quality management and reassure donors, particularly new ones and in view of direct financing. Improve and automate time management and expenditure tracking down to activity level, to ensure maximum cost efficiency. When TT feels that all systems and policies are in place and working, commission an external system audit to get an independent and comprehensive assessment. Systematization may seem a major undertaking, but it is to large extent documenting and perfecting what is already done in practice and does not have to be done all at once, but can be spread out over 2016 and 2017. Apart from administrative and financial systems and M&E already documented, main ones would be partner management, project management, capacity building and learning, risk management, relations with businesses, outreach, networking, advocacy and communication.
4. In particular develop a more systemic risk analysis and management system (separately covering concept, implementation and as well as sustainability/results for each major activity). Apart from directly minimizing risks, this helps to design more robust activities that can achieve impact, and also convincingly demonstrate to potential donors at the beginning that this is plausible.
5. TT to strive to attach senior level technical expertise, as formal or informal advisors, for all major areas where the management team does not have the required expertise. This will contribute to institutional memory, be a backup in case of staff leaving or when certain areas suspended for a time due to finance shortfall, and provide senior operational staff with mentors and sounding boards, something several of these have asked for in the interviews. Also to try to build up a network of quality-assured local consultants – finding good ones in time for demanding activities such as NIS and Transparent Town has been a challenge and complication.
6. TT to avoid engaging in heavy, stand-alone research endeavours, unless it has sufficient in house expertise in research management and cost –effectiveness is very high. Instead, concentrate on marshalling data and information to support evidence-based advocacy: research as input rather than as a product.
7. In general, work on the internal areas and the organizational implications of partial or full migration to VNGO, as a priority in 2016-2017. This should include a thorough analysis of pros and cons and descriptions of different relations and distribution of roles and resources between the two entities, as well as a migration plan, coupled with a realistic and credible short and medium term financing plan. This should result in a credible

roadmap to full sustainability that can be presented to donors and financing sources together with a programme from 2018 onwards.

8. The Team recommends that the VNGO should be well established and operating effectively and autonomously, and that the role of and relationship with a possibly still existing TT be clear and well-understood before pursuing chapter accreditation, this to ensure the transfer of TT's reputation, professionalism and credibility as TI counterpart.
9. TT to reflect on how and to what extent TT can extend outreach to a significantly larger stakeholder population, something which most interviewed stakeholders would like to see. Explore the possibility of creating a help desk function/virtual resource centre providing (free) advisory services, tools, methods and experiences from Vietnam and abroad as a means to engage with a wider stakeholder population, minimizing the risk of being seen as too active and too impatient to show a high profile.
10. TT to more clearly define its key mission activities that 'must' be done by an advocacy organisation of TI type, and the minimum staff and financial resources needed, which are the priority ones that need to be preserved in case of limited budgets. These activities are in some respects different from 'project' type activities, as results are more difficult to measure or attribute, and indeed may seemingly not have any results – one does not stop or devalue advocacy as such because (say) corruption is increasing, quite the contrary. It is a continuous activity, but may not as easily attract donors, so may require other funding sources.

Programme plan and design for the period 2016-2017

11. In other respects define a programme plan for 2016-2017 (and in the future) that is modular⁷ with a clear distinction between TT development activities towards sustainability, key mission operational activities, and other activities. The latter should be presented in a hierarchy of priorities of result-oriented activities that can be scaled up or down or (temporarily) stopped without destroying the coherence and synergy of the programme and key staff retention as and if funding varies; and that can attract donors that only want to support specific areas or activities and do not want to join any joint funding arrangement. The budget should separate activity costs and overhead (general management, administration etc.), and the TI-S support and administrative costs made visible, as the magnitude of these are carefully watched by donors. A preliminary version of a roadmap to sustainability of TT should accompany the programme plan submission for

⁷ Modules can of course be composed freely, as long as they are self-contained do not overlap, have a well-defined expected outcome, contribute additively but independently to achievement of overall results and goals, and do not depend on other modules implemented in parallel (though they may need input from modules implemented beforehand). They can be of various types, for example (i) replication of activities, e.g. a set of youth awareness activities, in different localities or for different target groups; (ii) periodic repetition of media campaigns or events; (iii) continued and/or enhanced support to on-going activities such as Youth Box or FACE in 1-2 year tranches; (iv) support to replicating models (ALACs, Transparent Town) in packages of 2-4 per module; (v) development and testing of a new concept or approach; (vi) engagement with and outreach towards new stakeholders, in different sets.

the 2016-2017 period. Similarly, there should be an accompanying roadmap to sustainability and replication/scaling up for major activities/projects that are not one-off events.

12. Concentrate, at least for the next two years, on ensuring that key promising and important initiatives/projects are very well supported and managed, with a view to subsequent replication and scaling up (by other partners and stakeholders), in particular Transparent Town and ALAC which are quite heavy. Not to hesitate to terminate less critical, peripheral or smaller activities, even if they have positive results but are relatively less cost effective, not easily scalable or lack convincing 'what next' answers. Have fewer but deeper activities. Deeper could be (i) following through the chain from output to impact: concept, pilot testing, evaluation, handing over to partner with or without continued TT involvement, replication and/or scaling up; (ii) implementing the same activities but in more locations and/or with more beneficiaries; and (iii) designing composite activities with complementary outputs from different components, i.e. reflecting synergy. The aim is to focus more than at present on ensuring potential impact and sustainability of results.
13. Many stakeholder interviewees mentioned business and youth as areas they would like to see more TT focus and concentration, and these are areas where cost effectiveness could be quite good, interest is manifest, and the need is great. In any case, given the election cycle in 2016, it is not the right moment to introduce new ideas and initiatives which may at first seem controversial, but rather continue within the same range as current activities.

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ANNEX 1 – TOR

MID – TERM PROGRAMME EVALUATION

TI Vietnam Programme *“To contribute to effective implementation of anti-corruption policies and practice in government, business and society, 2013-2017”*

1. INTRODUCTION

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

The Transparency International Secretariat in Berlin (hereafter TI-S) implements 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”*. Four donor agencies, namely UK DFID, DFAT Australia, IrishAid, and the Finnish Embassy in Vietnam have supported the programme for the duration 2013 – 2015.

The programme officially started in January 2013 and is the second programme of such a nature being implemented in Vietnam, the first running from September 2009 – June 2013. It is managed by the Asia Pacific Department (APD) of TI-S, while its execution and coordination is undertaken on the ground by Towards Transparency (TT) – TI’s National Contact in Vietnam (See Annex 1 of this document for a brief overview of TI Vietnam Programme).

The first phase of the TI Vietnam programme 2013-2017 will officially end in December 2015. The budget for the 2013-2015 phase is approximately 1.6 million Euros. A mid-term programme evaluation will be conducted as specified in the Joint Financing Agreement (JFA) signed between TI-S and the four programme donors. These Terms of Reference were developed by TI/TT with input from and approval by the TI Vietnam Programme’s four donors to guide the intended evaluation.

2. PURPOSE, OBJECTIVES AND SCOPE OF THE EVALUATION

2.1. Purpose

The purpose of the evaluation is to provide an external assessment of the TI Vietnam Programme, duration 2013 – 2015. *Recognising the context of working as a civil society organisation in Vietnam*, this evaluation aims to:

- Provide an objective assessment of the achievements and results, weaknesses and strengths of the programme; an analysis of its performance regarding process, relevance, and sustainability; and the extent to which the programme is contributing to desired impacts

- Generate lessons learned and good practice from each of the respective objectives of the programme
- Provide clear and forward looking recommendations that can guide TI Secretariat and Towards Transparency (TT) in refocusing interventions and developing strategies for the future implementation of the programme.

2.2. Scope

The evaluation will apply the Development Assistance Committee (DAC) evaluation to assess the **relevance, effectiveness, efficiency, impact and sustainability and outcome of the TI Vietnam programme from 2013 – 2014**. TI/TT also expects the consultants to incorporate a stakeholder analysis into this evaluation to not only gather feedback from stakeholders about TT's work but also to identify the level of relevance, interest, influence of each stakeholder to the TI/TT programme to inform future planning.

3. KEY QUESTIONS AND ISSUES

The following questions could be addressed during the evaluation, but are subject to discussion and agreement with TT/TI-S during the period of designing the evaluation approach.

Relevance

- To what extent are the goals, purpose, and intended results of the TI Vietnam Programme important for the target groups (e.g. Government, civil society, citizens including youth, business community etc)?
- To what extent is the TT/TI's work relevant and suitable to addressing the challenge of corruption in Vietnam?
- To what extent are selected project partners appropriate and relevant to the achievement of the project's set objectives?
- Are the activities and outputs of the Programme consistent with the programme goals and objectives (coherence of the planned chain of causality)?

Effectiveness:

- To what extent has the Programme achieved the stated objectives?
- In the context of the operating environment in Vietnam, how effective and appropriate was the programme approach?
- What are the key factors influencing the achievement and non-achievement of objectives? How effective was the cooperation and coordination between TT and TI-S and with other programmes in the same areas implemented by other development partners?
- In hindsight, what could have improved programme effectiveness?

Efficiency:

- Have planned activities and outputs been delivered on time and within allocated budget?
- Has the programme management and administration well functioned to help deliver the project objectives/outcomes? What could have been improved on TI-S and TT's side?
- Does the programme represent "good value for money" in relation to the results achieved? How is this assessed?
- What can be learned from the implementation of the programme's MEL framework for future MEL efforts?

Sustainability:

- To what extent will the current achievements of the programme be sustainable?
- What are the key constraints to sustainability? How could we address them in phase two of this programme as well as in future programmes?

Outcomes and Impact:

- What are the key outcomes of the programme?
- What has been the programme's contribution to changes in law, policy and advocacy objectives and in the overall anti-corruption agenda in Vietnam?

4. KEY TASKS

The following activities should be included in the evaluation process:

- Review and analysis of relevant documents (4 days);
- Preparation of work plan and field trip (03 days):
- Briefings, meetings (16 days including actual field work in and travel to/from Hanoi):
 - Relevant programme staff of TI-S in Berlin, and TT Management;
 - Representatives from the four programme donors;
 - Key anti-corruption stakeholders from donors, government agencies and working partners
 - Stakeholder analysis - partners, government agencies, other anti-corruption actors in Vietnam
- Draft Final Report sent to TT/TI-S by 08 May 2015 (4 days)
 - consultation with TT/TI-S and the donors which will include comments and input by both TI/TT and the donors
- Final Evaluation report: by 22 May 2015 (1 day)

5. DELIVERABLES AND REPORT

The expected output of the Evaluation will be a main report of maximum 20 pages (excluding annexes) written in clear English that will include:

- i) A brief analysis of the programme context (concept and context, goals and objectives, strategy/ approach, activities, target groups, organisational structure)
- ii) The evaluation methodology

- iii) Main Findings
- iv) Conclusions
- v) Recommendations and key lessons learned targeting TI-S/TT and donors for future anti-corruption initiatives and approaches; and;
- vi) A separate assessment report (of max. 3 pages) on stakeholder analysis

6. ORGANIZATION AND METHODOLOGY OF THE EVALUATION:

Time frame: Field work is expected to take place in early April 2015 (final dates to be confirmed). The report should be completed by 22 May 2015.

Methodology: We are open to the consultants' suggestions on the most appropriate evaluation tools to deliver this evaluation. Both quantitative and qualitative data should be utilised in assessing the programme. The final Methodology and report structure of the evaluation will be proposed by the selected consultants and agreed with TI/TT.

Consultant Composition and Qualifications: A team of at least two consultants (1 international and 1 local) is required to conduct this evaluation.

- *The international consultant (to be the team leader) is expected:*
 - To have at least 7 years of relevant experience with a clear and demonstrable Monitoring and Evaluation related focus on development programmes and projects;
 - To have prior experience working in developing countries, including some recent experience in Vietnam;
 - To be familiar with governance and anti –corruption issues and have an understanding of how TI works;
 - To be responsible for identifying and contracting the local consultant to work with; and
 - Excellent organizational and English writing skills;
- *The local consultant*
 - Needs to have at least 5 years of experience in working on stakeholder coordination/process facilitation in governance-related issues in Vietnam;
 - Prior experience in Monitoring and Evaluation of donor funded projects will be an advantage;
 - Excellent communication, Interpretation (from English to Vietnamese and vice versa), organization and meeting facilitation skills
 - Knowledge of anti-corruption issues in Vietnam will be an advantage

Contracts: A TI-S standard contract based on EU costs norms for engagement of external consultants will be applied for this assignment. Associated travel and administrative costs will also be covered. It is expected that the lead/international consultant will be responsible for contracting their own team. The maximum available budget for this evaluation contract is €20,000, fully inclusive.

Submission of Applications: Interested parties are kindly requested to send their application (in English) **5pm, 25 March (Hanoi time)** to the following email address: evaluation@towardstransparency.vn

The application should contain:

- An expression of interest, highlighting the applicant's skills and experience relevant to the specifications in the TORs (for both international and local consultants);
- The applicants' curriculum vitae;
- Detailed technical and budget proposals;
- Contact details of two independent referees with proven knowledge of the applicant's expertise and relevant work experience for this TOR.
- VAT Form for tenders (see website)
http://www.transparency.org/files/content/work/TIS_VAT_Form_for_Tenders.doc
- One sample of previous work

Only short-listed candidates will be notified.

TI/TT retains the right to reject any or all of the applications and/or to enter into additional negotiations with one or more of the tendering parties.

References/Annexes (to be provided to final shortlisted consultants)

1. TI Vietnam Programme Document, 2013-2017
2. TI Vietnam Programme's 2013 and 2014 mid-year and annual reports and donor meeting minutes
3. TI Vietnam Programme's MEL framework documents
4. TI Vietnam Programme Legal Review Reports: 2014
5. End-of-programme evaluation report of TI Vietnam Programme, 2009-2012
6. TT's suggested questions for Stakeholder Analysis

ANNEX 2 - LIST OF PEOPLE INTERVIEWED

TT Viet Nam staff

1. [REDACTED] ga, Executive Director
2. [REDACTED], Finance and Administration,
3. [REDACTED], Manager, Business Integrity
4. [REDACTED], International Senior Advisor
5. [REDACTED], Senior Programme Officer, Research and Policy
6. [REDACTED] Senior Programme Officer, Partnership and Advocacy
7. [REDACTED], Youth Engagement Officer (HCMC)
8. [REDACTED], Programme Officer
9. [REDACTED], Project Manager, REDD + Governance and Finance Integrity Project
10. [REDACTED] Thao, Project Officer, REDD + Governance and Finance Integrity Project
11. [REDACTED], Fin./Admin. Officer
12. [REDACTED], Admin. Officer
13. [REDACTED], Communication Officer
14. [REDACTED], Communication Support Officer
15. [REDACTED], Junior Consultant, Business Integrity
16. [REDACTED] Junior Consultant, Research

TT Advisory Board

17. [REDACTED] huyet, Member of TI Vietnam Programme Advisory Board, Member of the NIS Advisory Group
18. [REDACTED], Member of TI Vietnam Programme Advisory Board, Member of the NIS Advisory Group
19. [REDACTED], Member of TI Vietnam Programme Advisory Board, Founder and Owner of TT

TI, Berlin

20. [REDACTED], Programme Officer
21. [REDACTED], Regional Director Southeast Asia,
22. [REDACTED], Chief Accountant
23. [REDACTED], Group Director

Government, CSOs & Media

24. [REDACTED], Deputy General Inspector GI
25. [REDACTED], Deputy Director DPI, Ninh Thuan province
(Transparent Town project)
26. [REDACTED], President/Chief Economist, DEPOCEN
27. [REDACTED], IPL
28. [REDACTED], Head of Secretariat VBCSD, VCCI
29. [REDACTED] Journalist, MEC Director
30. [REDACTED], President, VIJUSAP
31. [REDACTED], Vice President, [REDACTED]
[REDACTED], Vice President, Board of Management, SHTP
34. [REDACTED], CDI
35. [REDACTED] – Youth Box Channel (HCMC)
36. [REDACTED], SAGE (HCMC)
37. [REDACTED] (HCMC, participant IMC)
38. Group of FACE Club (students)- HCMC
39. Group of IMC Youth (students)- HCMC
40. [REDACTED], Thanh Nien Daily (HCMC)
41. [REDACTED] Tre Daily (HCMC)

Donors

42. [REDACTED], Governance Advisor, DfID
43. [REDACTED], Head of Development Cooperation, Embassy of
Finland
44. [REDACTED], First Secretary Development Cooperation,
Australian Embassy
45. [REDACTED], Programme Officer, Australian Embassy
46. [REDACTED], Second Secretary, Embassy of Ireland
47. [REDACTED], Adviser Bilateral Relations, Embassy of
Ireland
48. [REDACTED], Attaché Development Cooperation, Embassy
of Belgium

Others

49. [REDACTED], Programme specialist, UNODC
50. [REDACTED], former Managing Director Rolls Royce Vietnam
[VIA activity]
51. [REDACTED], Senior Governance Specialist, the World Bank
52. [REDACTED], International Consultant, Team Leader
for TTP consultants
53. [REDACTED], former TT Deputy Executive Director
54. [REDACTED] ex- manager Anti-Corruption Strategic Fund

ANNEX 3 - LIST OF MAIN DOCUMENTS CONSULTED

COMPONENT/ RESULTS	DOCUMENTS CONSULTED
A. General materials relating to integrity, transparency and anti-corruption (in hard copy)	
	<ul style="list-style-type: none"> • 2013 PCB: views and experiences from Vietnamese citizens • RESIST Resisting Extortion and Solitation in International Transactions: a company tool for employee training • Survey report in support of the Government’s self-assessment of the implementation of the UN Convention against corruption (UNCAC) • Business principles for countering Briebery • Building a transparent town: An experience from Martin, Slovakia
B. TI Viet Nam programme documents 2013-2017 and related general documents	
	<ul style="list-style-type: none"> • TI Viet Nam programme documents 2013-2017 • Annual work plans (2013, 2014, 2015) • Mid-year and end-of year reports and donor meetings (2013-2014) and related annex activity progress reports • TI Viet Nam MEL (data collection tools, examples of event evaluation, CPI refection notes, etc.) • Annual financial reports 2013-2014 • Final Evaluation of TI Vietnam Programme 2009-2012 • Mid-term evaluation of PACREDD (3/2015) • Audit report (2013, 2014) • Reports of various study trips conducted in 2013-2014
C. Documents by components and activities	
A.1.1	Documents on OGP (WS/training agendas, and reports of WS/training participants)
A.2.1	<ul style="list-style-type: none"> • Capacity training documents, capacity training plan • KPIs set • slides, notes of brown bags • Documents of the training-cum-planning advocacy workshop (ws agenda, report, advocacy plan) • TT website tracking report • Operational and Personnel Manual • Legal review document (memo 1 & 2 with VILAF) • Code of conduct for partners • Capacity development plan; • Advocacy plan for 2015 • A code of conduct
B.1.1	<ul style="list-style-type: none"> • TT's work on CPI of 2014: TT's CPI message, CPI plan, reflection report of CPI 2014, media tracking report
B.2.1	<ul style="list-style-type: none"> • NIS final report (summary and review)+ Agenda + participant list + media tracking for NIS workshop

	<ul style="list-style-type: none"> • Publication containing key issues of “Integrity in the Judiciary” • Transparent Town: MoU with Ninh Thuan
B.2.3	<ul style="list-style-type: none"> • Integrity in Judiciary WS: agenda, participant list, minutes, media tracking, Contract with IPL • IPL report • Books including papers presented in the WS • Draft amendment of the Penal Code • Intergrity Me: <ul style="list-style-type: none"> - Links to Integrity Me website, FB channels: see annual report of end-of-year 2014
C.1.2.	<ul style="list-style-type: none"> • Partners' reports • YIS report • Communication plan for YIS • Youth Box Channel • -Report of consultant • -photos + agenda of Tax payer view talkshow
C.1.3.	
C.1.4.	
C.1.2	<ul style="list-style-type: none"> • Report of a nation-wide consultation workshop held on 29 May 2015 for other educational institutions to collaborate with Hoa Sen University and Towards Transparency on academic and business integrity (to collect)
C.2.1	<ul style="list-style-type: none"> • Contract with VIJUSAP to open ALAC • ALAC permit + workplan • ALAC launching plan • Partners' reports
C3.1	<ul style="list-style-type: none"> • Toidibenhvien platform • Todocabi website
D.1.1.	<ul style="list-style-type: none"> • Contracts with SHTP, MoU with HBA, MoU with Eurocham
D.1.2.	<ul style="list-style-type: none"> • Contracts with individual companies: NON-DISCLOSURE • Contracts with SHTP, MoU with HBA, MoU with Eurocham • Annual report from SHTP • Agenda + Presentation pp + evaluation result of several trainings/talk conducted by TT

ANNEX 4 – REVIEW OF PROGRESS AND BUDGET OF PROGRAMME ACTIVITIES PER APRIL 30

(data supplied by TT)

Keys: D-Done; PD-Partially done; ND-Not done; m/y=Month/Year, in €

Results	Activity	PROGRESS		Delayed/on track?	TOTAL BUDGET (costs for activities only)	SPENT BY 30.04.2015	TT staff and overhead costs (only by Component)	BALANCE
		Planned completion m/y	Actual status m/y (D,PD or ND) (a)					
A	Total						191,644	
A1	1.1 Supporting emerging CSOs and CSO networks and coalitions working on anti-corruption	Ongoing	PD 50%	Delayed - budget	12,798	10,813		1,985
	1.2 Providing resources and capacity development opportunities and training for CSOs and individuals wishing to strengthen their engagement in anti-corruption	Completed	D	On track	11,885	11,885		0
	1.3 Continuing engagement of TT and its civil society partners in regional and international exchanges/events	Ongoing	PD 80%	On track	19,652	15,471		4,181
A2	2.1 Strengthening TT's organisational, leadership and staff capacity to deliver effective anti-corruption projects	Ongoing	PD 80%	On track	28,906	22,125		6,781
A3	3.1 Formalising the engagement of TT's current advisors	Ongoing	D	On track	2,164	2,164		0
	3.2 Establishing an appropriate and independent legal entity that can become a fully accredited TI Chapter	Completed*	D VNGO *TI app to	On track	14,077	12,469		1,608

Results	Activity	PROGRESS		Delayed/on track?	TOTAL BUDGET (costs for activities only)	SPENT BY 30.04.2015	TT staff and overhead costs (only by Component)	BALANCE
		Planned completion m/y	Actual status m/y (D,PD or ND) (a)					
			PACCOM in process					
	3.3 Developing and implementing a fundraising strategy for the post 2015 period	Ongoing	PD	On track	0	0		0
B	Total						151,454	
B.1	1.1 Monitoring, assessing and supporting UNCAC implementation	2016/17	PD depends upon govt review schedule	On track	0	0		0
	1.2 Sharing the findings of the annual Corruption Perceptions Index (CPI) and of the Global Corruption Report (GCR) in Education, conducting the Global Corruption Barometer (GCB) in Vietnam	GCB 2016 CPI Done	PD 50%	On track	554	554		0
B2	2.1 Using the findings of the National Integrity System (NIS) study to promote improvements in policy and practice	Ongoing	50%	Report delayed. Advocacy on track.	38,425	33,927		4,499
	2.2 Piloting local (provincial or city level)	Ongoing	50%	On track	102,986	64,330		38,656

Results	Activity	PROGRESS		Delayed/on track?	TOTAL BUDGET (costs for activities only)	SPENT BY 30.04.2015	TT staff and overhead costs (only by Component)	BALANCE
		Planned completion m/y	Actual status m/y (D,PD or ND) (a)					
	tools and solutions for increased accountability and transparency							
	2.3 Providing ongoing technical inputs on key legislative issues, input to anti-corruption roundtables, as well as mobilising TI movement expertise to support emerging policy discussions, workshops	Ongoing	Done	On track	28,393	14,055		14,338
C	Total						219,559	
C1	1.1 Raising awareness among young people about corruption, its effects and possible solutions through networks and work with partners	Completed	D	On track	66,746	54,079		12,667
	1.2 Increasing young people's understanding and knowledge of corruption and anti-corruption through partnerships with educational institutions [LINK WITH D.2.4]	Completed	D	On track	26,989	13,989		13,000
	1.3 Carry out second edition of the Youth Integrity Survey (YIS), and widely promote its results	07/15	PD 70%	On track	54,040	49,680		4,360
	1.4 Using social media to engage	Ongoing	PD 70%	On track	19,124	11,807		7,317

Results	Activity	PROGRESS		Delayed/on track?	TOTAL BUDGET (costs for activities only)	SPENT BY 30.04.2015	TT staff and overhead costs (only by Component)	BALANCE
		Planned completion m/y	Actual status m/y (D,PD or ND) (a)					
	young audiences including by helping Youth Box Online Channel develop into a sustainable, youth-led initiative							
C2	2.1 Providing evidence about the state of whistleblower protection	Cancelled	Cancelled	Cancelled	694	694		0
	2.2 Identifying a suitable partner and fundraising for the implementation of a TI solution to provide free support and advice to victims and witnesses	Completed	D	On track	47,025	19,992		27,033
C3	3.1 Supporting pilots of innovative citizen and youth engagement approaches, including by using ICT and social media.	Completed	D	On track	5,729	5,729		0
D	Total						220,314	
D1	1.1 Identifying new partners and allies, such as Vietnam Business Forum, foreign chambers of commerce, selected foreign and domestic businesses, NGOs	Completed	D	On track	10,751	8,030		2,721
	1.2 Supporting the implementation of integrity programme at individual	Ongoing	PD 75%	On track	17,660	13,023		4,636

Results	Activity	PROGRESS		Delayed/on track?	TOTAL BUDGET (costs for activities only)	SPENT BY 30.04.2015	TT staff and overhead costs (only by Component)	BALANCE
		Planned completion m/y	Actual status m/y (D,PD or ND) (a)					
	business level							
	1.3 Supporting the implementation of integrity programme at collective action level	Ongoing	D	On track	31,173	21,177		9,996
D2	2.1 Contributing to ACD through research/discussion paper	Completed	D	On track	3,404	3,404		0
	2.2 Awareness raising for business integrity	Ongoing	D	On track	10,155	9,755		400
	2.3 Conducting advocacy to close gaps in the legislative framework relating to business' role in fighting corruption	Ongoing	PD 70%	On track	0	0		0
	2.4 Building a collaboration with at least one business school to integrate anti-corruption education for future business leaders	Ongoing	PD 50%	On track	0	0		0

Component <i>a</i>	Programme budget (on activities only)		Spent by 30.4.2015		Expenditure incurred by TT staff and overhead		Balance <i>h</i>	Total budget/expenditure <i>(b+f)</i>
	Amount <i>b</i>	% <i>c</i>	Amount <i>d</i>	% <i>e</i>	Amount <i>f</i>	% <i>g</i>		
A	89,482	16.1	74927	18.81	191,644	24.50	14555	281,126
B	169804	30.72	112312	28.17	151,454	19.36	57493	321258
C	220347	39.86	155970	39.13	219,559	28.04	64377	439,906
D	73143	13.23	55389	13.89	220,314	28.10	17753	293,457
Total	552,776	100.00	398,598	100.00	782,971	100.00	154,178	1,335,747

Component	Total number of activities	Cancelled activities	Completed activities	Partially done activities	
				Total	Above 70%
A	7	0	3	4	2
B	5	0	1	4	2
C	7	1	4	2	-
D	7	0	4	3	2
Total	26	1	12	13	6

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