

# Final Evaluation

of Transparency  
International's

## Regional-based Approach to NIS Assessments in European Neighbourhood South Phase II

Final Report

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## Abbreviations

AAWGT	Arab Advisory Working Group for Transparency
APHRA	Arab Programme for Human Rights Activists
CSOs	Civil Society Organisations
ENP	European Neighbourhood Policy
LTA	Lebanese Transparency Association
MENA	Middle East and North Africa
NCs	National Chapters
NIS	National Integrity System
TI	Transparency International
TI-S	Transparency International Secretariat
TM	Transparency Maroc



## Executive Summary

During Transparency International's (TI) project with the title "*Regional-based approach to National Integrity System (NIS) Assessments in European Neighbourhood South (ENS) – Phase II*" (thereafter referred to as "the project") National Integrity System (NIS) assessments were conducted in three MENA countries for the first time (Jordan, Libya and Tunisia). Advocacy activities were carried out in these three countries as well as in another four MENA countries, which had begun the NIS assessment process during an earlier, similar project ("Phase I", 2012-4): Egypt, Lebanon, Morocco and Palestine. The project's purpose was to promote evidence-based anti-corruption policy and practice by public and non-state actors. It operated from March 2014 until the end of May 2016. It was funded by the European Commission (90%) and TI-S (10%) and it cost approximately € 949,667 (based on provisional accounts).

The evaluation examines the project's impact, effectiveness, relevance, sustainability and efficiency looking at intended as well as unintended consequences and how TI's use of the NIS assessment process could improve in future.

### Project outputs against what was planned

Seven NIS country reports and a regional comparative report were published during this project as planned. Advocacy activities were carried out in all the countries except in Libya where civil war had broken out during the course of the project. Country advocacy plans drawn up during the project were generally adhered to, with some necessary adjustments. Against the overall project plan in the project proposal, there were delays in carrying out the research and producing the NIS studies in Jordan, Lebanon and Tunisia due to difficulties with carrying out the research or staff changes. Also, advocacy activities in Lebanon began in Year 2 instead of Year 1 and most of them took place towards the end of the project. In other countries, advocacy was carried out as originally planned. An unplanned output, which served the project's objectives well, was the creation of an Arab Advisory Working Group for Transparency in 2015 and their subsequent advocacy visit to the European Commission.

### Impact

There were successes under all project objectives. In all project countries – except Egypt and Lebanon - the project contributed to policy changes at national level. It improved the understanding of corruption risks through raising awareness amongst CSOs in all countries, amongst young people in particular in Egypt, Jordan and Tunisia and amongst businesspeople in Lebanon. The project also generated a significant volume of media coverage of its work and its advocacy issues especially in Egypt, Jordan, Morocco and Palestine. In many countries, new partnerships were created with CSOs, government departments and political parties and new relations were built with MPs. The project enhanced the knowledge, skills and experience of all of its implementing partners. All partners used the findings and recommendations of their NIS studies to develop advocacy plans with objectives.

Project partners influenced policy change in countries where the political environment was conducive to reform and open to civil society participation in policy formation. In Morocco, Transparency Maroc (TM) was the only CSO participant in the governmental committee drafting the National Anti-Corruption Strategy, which has now been adopted.



In Palestine, as a result of AMAN efforts through a CSO coalition it helped establish, a draft law on access to information was approved by the PA cabinet and awaits the President's administrative order to be enacted. Also other NIS recommendations have been adopted including regulations regarding the conduct of civil servants, a committee to monitor the institutional arrangements for the law on public procurement and amendments to the anti-corruption law by the Anti-Corruption Commission.

Younger NGOs and TI partners were also able to contribute towards policy changes in their countries during this project. In Tunisia, in coordination with two other NGOs, I-Watch successfully lobbied to reduce the restrictions outlined in the draft access to information law, which was passed in the Tunisian parliament with fewer restrictions. In Jordan, a very new NGO and TI partner, Rasheed, influenced government regulations on the financing of political campaigns and succeeded in gaining respect widely within only three years since its establishment despite being a very young NGO. In Egypt and Lebanon where the political environment was not conducive to the influence by NGOs in policy reform, the project did not succeed in contributing to policy change.

## Added Value

Through the NIS process, NCs were able to achieve things that they would not have been able to achieve without it. All Chapters acquired new or greater prestige and legitimacy as anti-corruption advocates in their countries. Being associated with an international organization like TI gave weight and added to the credibility of its partners in the region vis-à-vis government and civil society. The Arab Advisory Working Group for Transparency has created a new anti-corruption voice for civil society in the region. This and TI workshops or conferences which the staff of implementing partners attended provided opportunities for peer learning not only across the region but also from other parts of the world. TI-S played an active role in helping its MENA partners build stronger relations and smooth out potential rough edges with governments and other CSOs in project countries.

## Relevance

The NIS study is a unique source of evidence on corruption risks in the project countries. It has provided NCs with a comprehensive, thorough piece of research on the basis of which they could decide the issues to focus on in their advocacy work. Many key informants found the NIS methodology too complex and the report's analysis too difficult to communicate and recommended a more flexible approach in future where NCs can adapt the methodology to their advocacy needs and capacities.

## Effectiveness

Overall project objectives and anticipated results and, in most cases, objectives in the country advocacy plans, were set realistically.

Factors, which contributed to the project's achievements, include:

1. suitable political environments
2. past experience of TI partners in advocacy and campaigning
3. support given to NCs by TI-S particularly in overcoming research difficulties and
4. the authoritative and unique nature of the NIS study in each country, which gave NCs greater legitimacy as advocates.



Factors, which made it harder for the project to achieve its objectives, include:

1. The lack of the required level of research capacity in Jordan and Tunisia,
2. Difficulties in gathering data especially from government sources and delays in reviewing and approving the NIS draft reports.
3. In Egypt the new regime adopted unprecedented repressive measures against CSOs.
4. In Lebanon the political paralysis of the country made it impossible to influence policy change through legislation.
5. In Palestine occupation policies and the political division between the West Bank and Gaza created difficulties to project implementation.
6. The short term duration of this project is not helpful for advocacy purposes which require persistence over long periods of time.
7. Finally, frequent staff turn-over in TI-S and Lebanon contributed to delays.

## Sustainability

The project's achievements at the regional level and also in Jordan, Palestine and Tunisia seem sustainable in so far as there are plans to build on these achievements and there is confidence that funding will become available. In Lebanon, the NIS will inform future work but future funding is not yet clear. In Egypt, APHRA's future is threatened by new government measures against civil society.

## Efficiency

Although it seems that management arrangements ran efficiently, delays in the research process caused inefficiency. This evaluation is not in a position to state whether the same results could have been achieved with fewer resources as the scope of this evaluation did not allow us to draw such conclusions. With some qualification we can say *only in very broad terms* that, considering all the project's research and advocacy outputs and its advocacy successes in six countries plus at the regional dimension, overall this project appears to have been good value for money.

## Recommendations

To TI-S and National Chapters/partners:

1. In future apply the NIS approach more flexibly in each country. Design it together in ways that suit better the Chapters' needs and their environments (e.g. by focusing on only a few relevant pillars or by updating the studies as frequently as the Chapters require them).
2. Develop together new analytical tools to allow for context analysis that considers power relations and changing dynamics related to corruption, and the relationship between corruption and gender or between corruption and other social categories.
3. Build on the NIS research experience of this project by bringing MENA researchers together for peer learning, or exploring the possibility of peer reviewing among them, or setting up an Arab NIS research review committee.
4. Consider how TI's international standing could help towards offering protection to people who take great personal risks and whose safety is threatened as a result, in their fight against corruption in the MENA region.



To TI-S:

5. Repeat visits to MENA countries by TI's highest officials such as its chairperson or executive director with a view to meeting with the heads of states in these countries. Such high level contacts have proven beneficial to anti-corruption efforts in the past, as was the case in Jordan.



# 1 Introduction

The purpose of this evaluation is “to provide an external and independent review that assesses the performance and achievements in meeting the expected results and contributing to positive changes” of Transparency International’s (TI) project with the title “Regional-based approach to National Integrity System (NIS) Assessments in European Neighbourhood South (ENS) – Phase II” which operated from March 2014 until the end of May 2016.

This project is linked to a similar project which operated from 2012 to 2014 and it is referred to as “Phase I”. The scope of this evaluation, however, is to examine only Phase II of TI’s project. This means that this evaluation examines the NIS assessments conducted in Jordan, Libya and Tunisia and a regional one as well as the project’s advocacy in all project countries, except Libya: Egypt, Jordan, Lebanon, Morocco, Palestine and Tunisia. The evaluation examines the project’s impact, effectiveness, relevance, sustainability and efficiency looking at intended as well as unintended consequences and how TI’s use of the NIS Assessment process could improve in future.

This report was produced by INTRAC and it was authored by Dr Floresca Karanàsou, MENA Principal Consultant, INTRAC, who lead the evaluation team and assessed the regional dimension of the project, Egypt, Lebanon and Libya, Mr Ahmed Karoud, INTRAC Associate, who assessed Morocco and Tunisia and Mr Rifat Kassis, INTRAC Associate, who assessed Jordan and Palestine. TI retains the sole rights with respect to all distribution, dissemination and publication of the report.

In this report, for the sake of convenience, TI’s implementing partners are referred to also as National Chapters (NCs) or Chapters even though not all of them are official TI Chapters.

## 2 The Project in Brief

### 2.1.1 Title

“Regional-based approach to National Integrity System (NIS) Assessments in European Neighbourhood South – Phase II”. Thereafter referred to as “the NIS MENA project” or “the project”.

### 2.1.2 Duration

March 2014 – end of May 2016.

### 2.1.3

### Countries covered, implementing partners and relationship to TI-S

Country	Implementing Partner	Relationship to TI-S
<b>Egypt</b>	[Ahead of the Curve – Phase I – NIS research & report] One World Foundation – Year 1 (advocacy only) Arab Programme for Human Rights Activists – Year 2 (advocacy and NIS report launch)	Private consultancy company  Implementing partner Implementing partner
<b>Jordan</b>	Rasheed for Integrity and Transparency	National Chapter in formation
<b>Lebanon</b>	Lebanese Transparency Association	National Chapter
<b>Libya</b>	NIS research and report only – Year 1 Leader: <i>Voluntas</i> Advisory, Denmark with <i>Diwan</i> Market Research, Libya Nordic Consulting Group, Denmark	Private consultancy companies
<b>Morocco</b>	Transparency Maroc – <i>Association Marocaine de Lutte contre la Corruption</i>	National Chapter
<b>Palestine</b>	AMAN – Coalition for Integrity and Accountability	National Chapter
<b>Tunisia</b>	I Watch Organisation	Contact Group
<b>Germany</b>	Transparency International – Secretariat	

### 2.1.4 Goals

- 1) To improve the understanding of the performance of existing integrity systems in seven European Neighbourhood South states as part of the essential framework for preventing corruption
- 2) To mitigate primary corruption risks through evidence-based advocacy, including public education, advocacy geared at triggering policy reforms, and other relevant activities

### 2.1.5 Specific Objective/Purpose

To promote evidence-based anti-corruption policy and practice by public and non-state actors.

### 2.1.6 Outputs/Results

1. Strengths and weaknesses of integrity systems in project countries are identified.
2. Understanding of corruption risks by relevant stakeholders is improved in project countries.
3. New national and regional stakeholder coalitions are created in project countries and the ENP South region, linking Chapters and partners with CSOs and policy makers.
4. National civil society movement against corruption strengthened in all project countries and the region.
5. National priorities for anti-corruption are identified and advocated for.



## 2.1.7

### Activities

According to the project proposal, the planned activities included:

- research and publication of three NIS studies (Jordan, Libya and Tunisia) “that assess the anti-corruption efficacy of a country’s key governing institutions, that identify corruption risks and opportunities to mitigate corruption”<sup>1</sup>
- research and publication of a regional comparative report “laying out the basis for regional advocacy activities”<sup>2</sup>
- advocacy activities in Egypt, Lebanon, Morocco and Palestine (Phase I countries) during Years 1 and 2 and advocacy activities in Jordan, Libya and Tunisia (Phase II countries) in Year 2.

## 2.1.8

### Budget

€ 1,032,539.

## 2.1.9

### Cost

€ 949,667. This is a provisional figure as the project accounts have not been completed or audited yet.

## 2.1.10

### Funding

From the European Commission (90%) and TI-S (10%).

## 3 Methodology

The evaluation process began in late June 2016 and was completed at the end of August. Data was collected between mid-July and the first week of August.

Of the seven countries which were assessed three (Morocco, Palestine-West Bank and Tunisia) were assessed in situ and the others (Egypt, Jordan, Lebanon and Libya, as well as Palestine-Gaza, were assessed remotely (phone or Skype). Due to the political situation in Libya and the fact that there was no advocacy conducted there, it was agreed with TI to carry out a “light-touch” exercise of verification of key outputs.

The process for each country study was as follows:

- Document review.
- Interviews with staff of TI partners and TI-S to identify the outcomes on which to focus and the other key informants for interview.
- Interviews with internal and external stakeholders in order to verify a few key outcomes.

Informants were selected so as to ensure that in each country we interviewed not only those who had been involved directly with the project’s implementation but also people outside the implementing organisations or their advisory committees, who influenced or

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<sup>1</sup> TI, *Regional-Based Approach to National Integrity Systems (NIS) Assessments in European Neighbourhood South – Phase II, Annex I. Description of the Action, Update 2015*. Thereafter referred to as “project proposal”, p.7.

<sup>2</sup> As above.



were influenced by the project, who interacted with or benefited from it. The only exceptions were Libya where only one interview was conducted and Egypt where the “external stakeholder”, who belonged to a partner of the implementing organisation, had also acted as a trainer for the project.

Informants were interviewed using a semi-structured interview technique following a pre-agreed procedure. The interview format was based on a matrix of questions, which had been previously agreed with TI-S. Questions for each type of informant were identified and were used by all evaluators. The interview format was adapted to suit the circumstances (phone/Skype or in person, availability of the interviewee, etc.). Interviews were recorded digitally or through written notes. Permission was obtained before quoting sources and confidentiality has been respected.

Gender considerations were addressed by exploring in interviews with the implementing partners how the project took into account the different needs of men and women.

The work was divided by the evaluators as follows:

<b>Floresca Karanàsou based in Oxford</b>	Egypt (remotely) – 3 informants (1 interview, 2 written communications) Lebanon (remotely) – 5 interviews Libya (remotely-light touch) – 1 interview Regional (MENA) dimension (remotely) – 3 interviews TI-S (project staff & research staff) – 5 interviews					
<b>Ahmed Karoud based in Tunis</b>	Morocco (in person – travel to/from Tunisia) – 9 interviews Tunisia (in person) – 14 interviews					
<b>Rifat Kassis based in the West Bank</b>	<table border="1"> <tbody> <tr> <td data-bbox="571 1227 906 1294">           Palestine – West Bank (in person)         </td> <td data-bbox="914 1227 1437 1335" rowspan="2">           10 interviews + 2 focus group discussions         </td> </tr> <tr> <td data-bbox="571 1303 906 1370">           Palestine – Gaza Strip (remotely)         </td> </tr> <tr> <td colspan="2" data-bbox="571 1384 1437 1536">           Jordan (remotely) – 11 interviews         </td> </tr> </tbody> </table>	Palestine – West Bank (in person)	10 interviews + 2 focus group discussions	Palestine – Gaza Strip (remotely)	Jordan (remotely) – 11 interviews	
Palestine – West Bank (in person)	10 interviews + 2 focus group discussions					
Palestine – Gaza Strip (remotely)						
Jordan (remotely) – 11 interviews						

Conclusions and recommendations were agreed by the entire team.

### 3.1 Limitations

Due to budget limitations and the fact that all project countries needed to be covered more or less equally in addition to covering also the regional dimension of the project, the number of days that was possible for data collection on each country was small. It was limited to 2 days for those countries which were assessed remotely and 2.5 days for those assessed in situ. This had various implications. The evaluation team had a limited opportunity to explore issues in depth. We were able to verify and triangulate results as much as possible given this limited scope. We were not able to formulate a good picture of where this project fit within the programmes of each implementing



organisation in the MENA region, or where it fits within other anti-corruption efforts in each country. We also had too little evidence to answer some questions related to value for money and efficiency. For example, we were not in a position to establish whether certain activities, particularly those concerning advocacy, could have been conducted with less money.

Doing so many assessments remotely added to the limitations. The evaluators were entirely dependent on the staff of the implementing organisations (or a former Board member as the case was with Lebanon) in order to identify who the other informants could be. In some cases the informants were not knowledgeable enough about the implementing organisation or the project. The interaction between interviewer and interviewee was at best limited and in some cases difficult due to poor Skype connection or telephone lines. In the case of Egypt and Lebanon the initial informants were very slow in responding to interview requests. In the case of Gaza, it was not possible to visit it due to the Israeli-imposed closure.

Other limitations included the timing of the evaluation (including 'aid and the summer holidays) and also the fact that there was no final narrative report on the entire project ready before this evaluation began or by the time it had been completed. Only four countries had contributed final narrative reports.

Finally, it was not possible to interview anyone from the One World Foundation in Egypt, the implementing partner for Year 1 of the project. All findings on the project in Egypt, which are presented here, therefore, relied on project documents, a long interview with two informants from APHRA and written answers to questions from them and also on written answers to questions from another informant who works for another organisation but had conducted training for the project.

## 4 Findings

### 4.1 What was planned and what actually happened

The plan in the project proposal was to conduct advocacy-related activities in Egypt, Lebanon, Morocco and Palestine in Years 1 and 2 and to produce NIS reports in Year 1 and carry out advocacy activities in Year 2, in Jordan, Libya and Tunisia in Year 2. There was also a plan for a comparative regional report.

What actually happened is that, during this project, seven country NIS reports were published: those reports which had been delayed during Phase I (Egypt, Lebanon, Morocco and Palestine) and those which had been planned for Phase II (Jordan, Libya and Tunisia). (See Table 1 – *Anticipated Outcomes – 1. Strengths and weaknesses of integrity systems in project countries are identified*) In addition to the NIS reports, all implementing partners except for LTA also produced policy papers. Advocacy activities were carried out as scheduled in all countries except Lebanon. Staff changes at LTA caused the delay of the NIS research and, as a result, advocacy work began in Year 2 – with most activities being conducted towards the end of Year 2. Difficulties in carrying out the NIS research caused delays in Jordan and Tunisia where the NIS reports were finalised during Year 2 rather than Year 1. The NIS research on Libya was conducted during Year 1 but no advocacy was planned or conducted in Libya due to the outbreak



of civil war. Money budgeted for this work was re-allocated to advocacy in other countries and for the region as a whole, following agreement with the European Commission.

**Table 1**

<b>Anticipated Outcome #1</b>	<b><i>Strengths and weaknesses of integrity systems in project countries are identified.</i></b>
<b>Regionally</b>	<i>Arab Anti-Corruption Authorities – The Way Forward</i> , report (March 2016) - the first report of its kind for the region.
<b>Egypt (Phase I country)</b>	Second NIS report launched in Year 2 (August 2015). 260 copies were distributed. (First NIS report in 2009) Two policy papers published.
<b>Jordan (Phase II country)</b>	First ever NIS report published at the end of project Year 2 (May 2016). 100 copies of the executive summary were disseminated. Media coverage exceeded expectations including 2 TV interviews. Three policy papers published.
<b>Lebanon (Phase I country)</b>	Third NIS report launched early in Year 2 (March 2015). (Previous NIS reports in 2009 and 2011)
<b>Libya (Phase II country)</b>	First ever NIS report published late in Year 2 (March 2015) together with two working papers. The report was disseminated to 250 people in Libya. Two policy papers published.
<b>Morocco (Phase I country)</b>	Second NIS report launched in the beginning of Year 2 (March 2015). Tens of articles in the press and publicity on 3 radio stations over 10 days. (First NIS report in 2009.) Two policy papers published.
<b>Palestine (Phase I country)</b>	2013 NIS report launched in the beginning of Year 2 (February 2015). (First NIS report in 2010.) 450 Arabic and 150 English copies were disseminated. 238 downloads in both languages. Two policy papers published.
<b>Tunisia (Phase II country)</b>	First ever NIS report published after the end of project Year 2 (July 2016). NIS webpage had 864 downloads from 26.3.15 to 18.2.16. Three policy papers published.

Finally, a regional report comparing anti-corruption agencies (ACAs) in five project countries was published towards the end of Year 2. An important development, which was unplanned but served the project's objectives well, was the creation of an Arab Advisory Working Group for Transparency (AAWGT) in 2015 and their subsequent advocacy visit to the European Commission.

In all countries advocacy plans for this project were drawn up and overall, they were adhered to with the necessary adjustments being made.

It is worth noting here that the NIS studies in Jordan, Libya and Tunisia were the first ones ever conducted. In Egypt, Lebanon, Morocco and Palestine, NIS studies – using an older TI methodology – had been conducted in 2009 – 2010.



## 4.2 Impact

This section presents those findings, which the evaluators were able to establish within the timeframe of this evaluation. As many advocacy activities took place during the final year of the project, and in some cases towards the end of the project, it is possible that there will be more impact in future, which is not possible to determine yet.

**In brief:** There were successes under all project objectives. In all project countries - except Egypt and Lebanon - the project contributed to policy changes at national level. The project improved the understanding of corruption risks through raising awareness amongst CSOs in all countries, amongst young people in particular in Egypt, Jordan and Tunisia and amongst businesspeople in Lebanon. It also generated a significant volume of media coverage of its work and its advocacy issues especially in Egypt, Morocco, Jordan and Palestine. In many countries, new partnerships were created with CSOs, government departments and political parties and new relations were built with MPs. The project enhanced the knowledge, skills and experience of all of its implementing partners. All partners used the findings and recommendations of their NIS studies to develop advocacy plans with objectives.

Evidence-based anti-corruption policy and practice by public and non-state actors

The purpose of the project - as described in its logframe - is “*to promote evidence-based anti-corruption policy and practice by public and non-state actors*”<sup>3</sup>. **This project contributed to policy changes in many countries and most of all in Palestine where many recommendations of the latest NIS report have been adopted by the Palestinian Authority (PA) in Ramallah. In many cases, TI partners had the leading amongst CSOs in promoting policy change.**

In **Morocco**, Transparency Maroc (TM) was the only CSO participant in the governmental committee drafting the National Anti-Corruption Strategy, which has now been adopted. This strategy was one of TM’s earlier calls following the 2009 NIS study. In **Palestine**, the PA’s National Anti-Corruption Strategy has been modified in accordance with recommendations of the NIS study.

In **Tunisia**, in co-ordination with two other NGOs, I-Watch successfully lobbied to reduce the restrictions outlined in the draft access to information law, which was passed in the Tunisian parliament with fewer restrictions. They attended the meetings of the legislative committee as observers and they also discussed with MPs particular wording of the draft law in order to make it less restrictive. In **Palestine**, a draft law on access to information was approved by the PA cabinet and awaits the President’s ratification (an administrative order) to be enacted. AMAN worked through *Khabirni*, a civil society coalition it had previously initiated, and they presented comments to the PA cabinet. They were invited to join the drafting committee for this law and its comments were integrated in the draft law.

In **Palestine**, a number of NIS recommendations have been adopted:

- The PA cabinet has developed further regulations regarding the conduct of civil servants.

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<sup>3</sup> TI, *Annex 1 – Logical Framework*, Updated 2015.



- The PA cabinet has also formed a committee to monitor the institutional arrangements for the law on public procurement, in order to start implementing it in 2016.
- The proposed PA budget was issued according to how the law stipulates that it should be issued.
- The Anti-Corruption Commission has used the NIS study to draft amendments to the anti-corruption law.

Changes also occurred amongst non-state actors in **Palestine**. Wafa, the official Palestinian news agency and the Al-Hayat Al-Jadida newspaper have both established investigative reporting units following training provided to journalists by AMAN. The media department of the Al-Aqsa University in Gaza created a curriculum on investigative journalism with AMAN's help. Two universities, one in the West Bank and one in Gaza, developed curricula for training of their students in investigative reporting following AMAN trainings of journalists and university students.

In **Jordan**, the Independent Election Commission adapted their policy on the regulation of the financing of political campaigns according to the recommendations made to them by Rasheed. Rasheed began to operate as a CSO shortly before this project began. In this short period of time Rasheed succeeded not only to influence change at policy level, but, according to those interviewed in government and outside, it also enjoys great respect. Rasheed has also been asked by the Integrity and Anti-Corruption Commission in Jordan to assist them with measuring transparency, integrity and ethics in accordance with the new law.<sup>4</sup>

In **Morocco**, TM played the leading role amongst CSOs in the legislative committee, which is drafting the access to information law. In **Egypt**, APHRA initiated the drafting of a law to establish an independent anti-corruption commission in cooperation with other CSOs, legal experts and academics. Although this draft law is a civil society initiative, two MPs have committed to calling for the establishment of such a commission in the Egyptian parliament.

Finally, the EU renewed for another year its sanctions against the private assets of former Tunisian President Zein Al-Abdin Ben Ali and former Egyptian President Hosni Mubarak despite challenges against these sanctions. This happened after the AAWGT's visit to Brussels in December 2015, when the AAWGT lobbied the EU officials to keep the sanctions in place. It is not possible to establish what might have been the contribution of TI's actions to this decision, but it is worth acknowledging this intervention.

(Anticipated outcome #1 has been addressed above, under 4.1 What was planned and what actually happened and on Table 1.)

Anticipated outcome #2 – Understanding of corruption risks by relevant stakeholders is improved in project countries

**The project improved the understanding of corruption risks through raising awareness amongst CSOs, young people and businesspeople.**

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<sup>4</sup> [REDACTED], executive director, Rasheed, written communication to FK, 24.8.16.



Perhaps the most impressive success, in the area of improving the understanding of corruption risks, is that it was able to interest, educate or mobilise young people in Egypt, Jordan, Palestine and Tunisia employing innovative methods. For example, in **Tunisia**: young people were helped to produce videos and new Apps and to use Facebook and Twitter to link with eight MPs in order to ask questions. Young people participating in project workshops also learnt about investigative journalism. In **Jordan**, Rasheed ran a nation-wide debate programme with university students on the financing of political campaigns and the first ever “moot courts” on virtual corruption cases. In both countries, young beneficiaries of the project spoke about the importance such activities had in their lives. In **Egypt**, APHRA training workshops gave rise to the establishment of three youth groups with an anti-corruption focus in governorates outside the capital. Two of these groups have registered as NGOs with the authorities and they have continued to get help from APHRA since the project ended.

The project also succeeded in generating great media interest in corruption risks in Egypt, Morocco, Jordan and Palestine. In **Egypt**, many newspaper articles were published in Egyptian newspapers on International Anti-Corruption Day 2015 on the two advocacy issues on which APHRA focused, namely the need for an independent anti-corruption commission and the activation of the national anti-corruption strategy. This happened as a result of APHRA meetings with newspaper editors and journalists. In **Morocco**, approximately sixty press articles appeared about the new NIS study. TM publicised the NIS study with a radio advertisement, which was broadcast over ten days. Relevant findings from the study were presented in three radio programmes. In **Palestine**, over forty investigative articles were published in the press following AMAN trainings in investigative journalism. In **Jordan**, the media’s understanding of anti-corruption issues is now more evidence-based.

In **Lebanon**, private sector actors, CSOs and media institutions signed a pledge to adopt a Code of Conduct on good governance and integrity created by LTA. In **Morocco**, UN officials, journalists and government officials in several Moroccan cities learned about and debated issues around the NIS study in nine workshops organised by TM in cooperation with NGOs in different localities.

Anticipated outcome #3 – New national and regional stakeholder coalitions are created in project countries and the ENP South region, linking Chapters and partners with CSOs and policy makers

**During this project, new partnerships were formed with governmental bodies, political parties and civil society actors across the region.**

Cooperation among TI-S’s regional partners was strengthened with the establishment of a new regional body, the **Arab Advisory Working Group for Transparency (AAWGT)** in 2015, which includes regional experts and representatives of MENA NCs. As a result of their advocacy visit to Brussels in December 2015, the AAWGT and TI-S staff built new relations and communication channels with relevant EC officials. They also built their understanding of how EU policy is made and how important it is to have good relations with the EU delegations in their countries. Two AAWGT members authored the first ever report comparing and assessing regional anti-corruption authorities (ACAs) in 5 MENA countries on the basis of findings in the latest NIS reports. TI-S launched this report in Casablanca in March 2016 at a meeting of representatives of Arab ACAs and CSOs where the two sides came together for the first time to discuss this topic.



In **Jordan**, Rasheed formed a partnership with the Independent Election Commission to promote project objectives and train public employees, and with the Integrity and Anti-Corruption Commission to train and assist them to carry out their new mandate. In **Egypt**, project activities created opportunities for cooperation between Egyptian political parties and CSOs on corruption issues, which was lacking before. A National Anti-Corruption Monitor was formed for overseeing parliamentary conduct with the participation of eight political parties. Another coalition, “One Year After the National Strategy Against Corruption,” was also formed. In **Tunisia**, the project enabled I-Watch to build new relations with MPs and to create a network of parliamentary allies for the first time. In **Morocco**, TM cooperated with CSOs in Agadir, Marrakesh and Tangiers in organizing joint seminars on the NIS.

Anticipated outcome #4 – The national civil society movement against corruption is strengthened in all project countries and the region

**The project enhanced the capacity of the implementing partners in many ways either through training workshops or through the project’s processes of political engagement. A large part of the added value of this project for the implementing partners in fact lies precisely in this capacity development.**

In **Tunisia**, I-Watch staff gained greater experience in lobbying Tunisian MPs through this project. Through lobbying on the access to information law, I-Watch learnt how parliamentary committees work and about the relationships between different political parties. The project enabled I-Watch to make the transition from carrying out sporadic activities on specific issues to a more systematic approach to its work and working with many institutions. In **Egypt**, APHRA acquired new skills in how to prepare a draft law and learnt new things about asset recovery and advocacy by attending TI-S workshops. In **Morocco**, the project helped TM strengthen its relations with the media and other CSOs. In **Jordan** the project helped Rasheed to gain experience in lobbying for policy change, in creating partnerships with Jordanian universities and strategic relations with local media.<sup>5</sup> The **AAWGT** received training in communications and in dealing with the media by TI-S training.

Anticipated outcome #5 – National priorities for anti-corruption are identified and advocated for

The indicator for this outcome in the project logframe deals with the relation between the NCs’ advocacy plans and the NIS studies’ recommendations. **In all countries, except Libya where there was no advocacy activity for reasons explained earlier, TI’s partners designed their advocacy plans for this project according to the findings and recommendations of the NIS studies.**

Added Value

In addition to **the development of the implementing partners’ capacity in terms of new knowledge, skills and relations with other stakeholders**, there are other ways in which the project enabled the NCs to achieve things that they would not have been able to achieve without it:

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<sup>5</sup> [REDACTED], as above.



1. **Through the NIS process all NCs acquired new or greater prestige and legitimacy as anti-corruption advocates in their countries.** The profile of the new and small TI partner in **Jordan**, Rasheed, was transformed through this project: Rasheed is now one of the main sources of information on corruption issues, it is consulted on electoral issues and it has been asked to monitor elections, in addition to the request to train integrity commission staff on how to measure integrity and transparency in Jordan. The project enabled I-Watch in **Tunisia** to make the transition from carrying out sporadic activities on specific issues to a more systematic approach to its work and working with many institutions. In **Palestine**, AMAN's leading role in Palestinian civil society anti-corruption efforts has been strengthened according to officials from the government, the media and other CSOs.
2. **Being associated with an international organization like TI gives weight and adds to the credibility of its partners in the region vis-à-vis government and civil society.**
3. The AAWGT with its advocacy, not only in Brussels but also through joint statements and actions since then, has created **a new anti-corruption voice for civil society in the region.**
4. **By connecting the staff of TI's partners across the region in workshops they have been able to learn from each other's experience.** For those who were able to attend international TI conferences there was additional benefit from learning about anti-corruption work in other regions of the world where civil society also experiences huge challenges.
5. **MENA regional staff at TI-S**, who were not directly responsible for the implementation of the project, visited government officials and other CSOs in project countries in order to help project partners **build stronger relations and smooth out potential rough edges to the benefit of the project.**
6. In **Palestine**, the level of **expertise provided during the trainings on investigative journalism** would not have been possible without this project.

### 4.3 Relevance

The project's suitability for its implementing organisations lies in the fact that the NIS study is a unique source of evidence on corruption risks in the project countries. It is suitable to the NCs' policies in so far as the report has provided them with a comprehensive, thorough piece of research on the basis of which they could decide the issues to focus on in their advocacy. For many partners the NIS study provides them with a roadmap. Many NCs concurred that there is no other report like it in their countries in terms of depth and breadth of analysis of anti-corruption risks. With its authoritative nature, the NIS study makes "a very strong advocacy instrument for CSOs".<sup>6</sup> It is not a confrontational tool, because the NIS approach provides opportunities for different stakeholders to work together in order to reform various "pillars".<sup>7</sup> In relation to World Bank reports, NIS studies provide a qualitative analysis and cover more sectors.<sup>8</sup>

Apart from the use of NIS by NCs, there is also evidence that in Jordan and Palestine policy makers have been able to use the NIS recommendations in their policies. As already stated, in Jordan the Independent Election Commission modified its policy on the financing of political campaigning. In Palestine, the Ministry of Education began to

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<sup>6</sup> Member of the AAWGT, Skype interview for this evaluation.

<sup>7</sup> ██████████, regional director, MENA, TI-S, Skype interview, 26 July 2016 and ██████████, director, research and learning, TI-S, Skype interview, 4 August 2016.

<sup>8</sup> Member of AAWGT, as above.



provide recruitment information for its appointments on a website it developed to help candidates and to also provide information on how to apply for scholarships. NIS concepts in the educational curriculum. The reports on Jordan, Lebanon and Libya have been useful to international donors.<sup>9</sup>

This project suited well TI-S's former strategy and its public sector programme, which was very evidence-based. The NIS process formed the core tool of the Chapters to work on public sectors at the national level in their countries.<sup>10</sup>

The NIS approach was applied in the MENA region very much following the TI formula, which is applied anywhere else in the world. When the research was designed there was only some small tweaking on whether a pillar should be omitted here or another should be added there. The training of NCs in research methodology and advocacy planning was based on TI tool kits used in other regions too. Each country designed its advocacy strategy with TI-S reviewing and approving the plans but the decisions on what to do were taken by those who know the context best, namely the NCs and their advisory boards. The context was analysed to the extent that some NCs used the PEST or other analytical tools included in the tool kits. The context analysis seems to have lacked a deeper understanding of power relations and dynamics related to corruption in each country nor did it dwell on how corruption affects men and women differently or different social groups.

This evaluation cannot say to what degree the project suited the organisations' priorities and policies as we do not have enough information about what these were prior to the project. We do not have a picture of where the project fit within the strategies of these organisations. Nor do we have a picture of other anti-corruption efforts in each country.

Gender considerations informed the implementation of this project in so far as all implementing partners put effort into ensuring equal numbers of men and women amongst training participants and members of the NIS advisory groups. In some cases (Egypt, Jordan and Lebanon) they succeeded in securing at least equal, if not more, numbers of women in training workshops, but NCs were able to ensure the participation of only a small number of women in their NIS advisory groups.

## 4.4 Effectiveness

Overall project objectives and anticipated results and, in most cases, objectives in the country plans, were set realistically. Advocacy issues were selected on the basis of what might be achievable within the short (one year) timeframe of this project ("winning issues").<sup>11</sup> As noted in the Impact section above, the project realised successes under all its objectives including contributions to policy change in most project countries. However, the targets in the initial time frame (project proposal) were not adhered to.

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<sup>9</sup> On USAID and DfID ██████████, project leader for the NIS study on Libya and principal, Voluntas, Skype interview, 15 July 2016 and on UNDP member of the AAWGT, as above, and ██████████, chairperson, Board of Directors, LTA, phone interview, 4 August 2016.

<sup>10</sup> ██████████, as above.

<sup>11</sup> For example, TI's advocacy tool kit for Jordan states as step #1 for building an advocacy plan "picking the winning issues". TI-MENA Department, *NIS II Advocacy Planning Rasheed Coalition 15-16 June 2015*, PowerPoint Presentation.



The completion of NIS studies in Jordan, Lebanon, Morocco and Tunisia and the publication of NIS reports in all countries were delayed. The reports of Libya, Jordan and Tunisia (the three Phase II countries) were published in March, May and July 2016 respectively – the Tunisian report was launched after the end of the project. This means that, although the advocacy in Jordan and Tunisia had already begun before the reports were published – and it had been impactful in the ways described in the previous section of this report - there was not enough time left to capitalise on the reports' publication. The reports of Phase I countries, namely Palestine, Lebanon, Morocco and Egypt, were issued in February, March and August 2015 respectively.

Factors that contributed to the project's achievements

Two are the most important factors that contributed to the achievement of the project's objectives:

1. **political environments in certain countries, which were conducive to reform** and open to the participation of CSOs in policy processes and
2. **the previous experience of TI's partners** in fighting corruption in their countries.

In **Palestine** the PA's dependence on foreign aid makes it vulnerable to donor pressure to reform. Although the PA's stance towards civil society has hardened recently, AMAN's long track record – longer than the official Anti-Corruption Commission's – has enabled it to continue to play a leading role in anti-corruption efforts. **Morocco** has been undergoing reforms and opening up political participation. TM is another experienced TI partner with two decades of experience. The **Tunisian** government is also undertaking reforms and the new constitution (January 2014) has articles on the proper use of public funds and the prevention of corruption. I-Watch had some campaign experience prior to this project, although it is a relatively new organisation (established in 2011). **Jordan** has been working on anti-corruption legislation and it has also opened itself to close partnerships with civil society. Unlike, TI's other partners, Rasheed is a very young NGO, so its success in influencing policy is all the more impressive.

Another important factor contributing to the project's successes was **the support provided to NCs by TI-S in managing the project and in research and advocacy** through frequent communication and coaching as well as formal training. NCs commented on the value of such support and the dedication of TI-S staff. Such support was necessary and crucial in overcoming the difficulties that arose over research in many countries as some partners did not have the right capacity to manage a complicated research process such as the NIS (for example Jordan and Tunisia). This support, however, was "heavy lifting" for TI-S staff and it has provoked some re-thinking in TI-S about the whole approach to conducting NIS studies.<sup>12</sup>

**Finally, the authoritative and thorough nature of the NIS study** and its uniqueness in each country contributed to giving NCs a weight that helped them become more influential towards key stakeholders. The quality of the NIS report, however, also caused them problems, which are discussed below.

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<sup>12</sup> [REDACTED], as above.



Factors that made it harder for the project to achieve its objectives

1. Although the project met its objective to produce NIS studies in all seven project countries by the end of the project, **there were delays in completing the research within the envisaged timeframe** (i.e. by the end of Year 1) in all countries except Egypt and Libya where professional consultancy companies had been hired and in Palestine where AMAN had the right research capacity for the task.

The reasons for the delays in carrying out and completing the studies were many:

- Finding the necessary data was difficult, especially from government sources. Downloading information from the web in places where WiFi connections are of low capacity is an added problem.
- Some NCs did not have previous experience in managing research projects or the right level of research skills (Jordan, Lebanon and Tunisia).
- The remuneration offered was not always suitable for attracting experienced researchers.
- Review processes took longer than expected due to delays and other difficulties in translating the drafts from Arabic into English before they were sent to TI-S for review. Delays were also caused in some cases as additional reviewers were added to the standard review procedure by the NCs, their advisory boards or TI-S staff.<sup>13</sup>

Although the thoroughness of the NIS study is a strength and it gave NCs kudos and authority as advocates for change, it also contributed to a weakness in the approach, namely that the report is too long, too complicated to read and digest and too expensive to print. In some cases this weakness was addressed by producing short Working Papers for advocacy purposes. Many NCs stated that they have to produce shorter documents in order to be able to share it widely. In most project countries, short policy papers, focusing on one issue only, were also produced. (See Table 1.)

2. **The political climate in Egypt and Lebanon** was not conducive to using the NIS process to promote policy change. TI's partners in **Egypt** (APHRA in Year 2) and **Lebanon** (LTA) are both experienced in anti-corruption campaigning, but they were not able to contribute to policy changes in government.

In **Egypt**, the government and the presidency have made public statements against corruption and a National Anti-Corruption Strategy was launched in December 2014. However, foreign-funded NGOs, especially human rights ones, have faced enormous obstacles in carrying out their work and it has become very difficult for CSOs to engage with government officials.

**Lebanon's** civil society does not experience the restrictions imposed on CSOs in Egypt and elsewhere in the region, but the country has been experiencing a political stalemate for the past two years. It has not been possible to elect a new president and parliament has not been enacting much legislation during this period. An access to information draft bill, on which LTA had worked before this project, has still not been discussed in parliament. For this reason, LTA focused its advocacy, not on MPs but on CSOs, the private sector and the media. Some key informants were of the opinion, however, that LTA did not engage with MPs enough during this

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<sup>13</sup> [REDACTED], former project co-ordinator of Phase I and II until December 2014, Skype interview, 3 August 2016.



project and they believe that LTA should put greater emphasis on advocacy and lobbying in its next phase.<sup>14</sup>

In **Palestine**, Israeli occupation policies such as closures and raids affected AMAN's activities. The political separation between Hamas-governed Gaza and PA-governed West Bank means that AMAN has to deal with two different regimes and that the same report may be regarded and interpreted differently in each place.

When discussing the political environment and the effectiveness of this project it is worth noting that effective anti-corruption work sometimes carries great risks to personal safety. Informants interviewed in Jordan, Palestine and Morocco raised the issue of security and protection for journalists or others who uncover corruption cases. This is something that TI-S and its MENA partners should explore further in order to see how they can enhance the safety of people who take such risks.

3. The use of the NIS report for advocacy purposes was reduced by the fact that the project was only for two years and in the new Phase II countries only one of the two years was dedicated to advocacy. Due to **the short term nature of this project**, NCs chose advocacy issues and set their objectives largely on the basis of what seemed achievable and realistic to yield results in a short period of time. Change in policies, however, needs a long-term timeframe, and this project could not provide that. For this reason, the sustainability of its results is particularly crucial.
4. **Frequent project staff turn-over** affected the project adversely in both Lebanon and TI-S contributing further to delays.

How effective and appropriate was the project approach?

The difficulties encountered by the project in carrying out the research on time point to the conclusion that the NIS approach is a heavy tool – too heavy for NGOs lacking sufficient research experience and operating in countries where access to crucial data particularly from government sources is limited. Many key informants commented that the methodology is too complex and the report's analysis difficult to communicate even to policy makers. Against these difficulties lie the credibility benefits NCs accrue from producing such a study.

The TI-S intention that the NIS approach be used by its partners as a participatory tool. The TI-S the assumption is that the more involvement there is in the NIS process from external key stakeholders from the beginning<sup>15</sup>, i.e. when the research is being designed, the more successful the project can be because the buy-in of external stakeholders can help the TI partners promoted their advocacy issues more effectively. Buy-in from external stakeholders can also help the TI partners in ensuring the sustainability of their advocacy efforts after the project has finished.

The evidence gathered during this evaluation does not provide a full picture of the role played by the advisory groups. In Morocco, the advisory group seems to have fit the model well: members came from different sectors including the government and they were very engaged with the NIS study from beginning to end. Elsewhere, where we have gathered evidence, either the advisory groups were not able to function as groups

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<sup>14</sup> ██████████, as above and ██████████, independent MP, Lebanese parliament, phone interview, 4 August 2016.

<sup>15</sup> The schedule in the project proposal shows that advisory groups must meet in the second month of the project's life.



(in Libya and Lebanon) or there was not sufficient commitment on the advisory group's part to the project's requirements (Jordan).

In hindsight, how could the NIS project have been improved?

The points that follow are compiled from opinions expressed by NCs and other internal stakeholders in the project countries, TI-S staff and the evaluators themselves. They also link to problems raised elsewhere in this report.

- a. The NIS approach could have been more flexible from the outset, so that NCs could have adapted it to suit their needs and capacities. For example, fewer pillars could have been selected for analysis, the study/report could have been shorter and the language easier to understand. Alternatively, more time should have been allocated to research from the outset. A more flexible approach would have required perhaps fewer resources to be dedicated to this project from the TI-S end. TI-S is already considering making the NIS model more "self-administered by the NCs" allowing NCs greater flexibility.<sup>16</sup>
- b. More innovative ways could have been used to communicate the reports' findings to a wider audience. Regarding the Libya report, TI-S could have promoted it more internationally.
- c. NCs could have been consulted more extensively at the stage of drafting the project proposal to the European Commission to ensure that they agreed with the set targets.
- d. There should have been more time allowed between the approval of the funding and the beginning of the implementation of the project. This might have reduced the delays during Year 1.
- e. The advisory groups reviewing the draft reports could have benefited from induction into how to review such a report.

## 4.5 Sustainability

There is no plan to have a Phase III of this project. The project proposal had envisaged that a number of factors would ensure project sustainability including the following:

- Systematic changes in NIS in each country
- Buy-in from various stakeholders from the outset
- The enhanced research capacity of the NCs and hence their ability to update the NIS studies with fewer human and financial resources
- Financial sustainability through expert support and assistance to the NCs including developing project sustainability plans with the Chapters, contacts and identifying diverse funding sources
- The Chapters' capacity development during the project

TI implementing partners and TI-S are able to ensure the sustainability of project outcomes in the following ways:

- In **Jordan**, Rasheed is determined to build on its achievements during this project. Foreign donors and local partners have already expressed interest in its work.
- In **Lebanon**, a completely new Board of Directors and almost completely new staff at LTA plan to design a programme strategy with greater emphasis on advocacy rather than research. The NIS report will continue to be used as a resource in their future advocacy plans.

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<sup>16</sup> [REDACTED], as above.



- In **Palestine**, AMAN will carry on within existing coalitions and it feels confident that it can continue to conduct further NIS studies focusing on only some of the pillars even without TI-S funding. Investigative units established in two major media outlets and the establishment of a university curriculum on investigative journalism bode well for developing this area further.
- In **Tunisia**, I-Watch wants to continue building on their advocacy achievements such as their new relationships with MPs and other CSOs and their work with young people. It believes that this project has put them in a better position to secure funding from international donors.
- The activities of the **AAWGT**, the regional advisory committee, will continue with funding from another TI-S project. As a result of the Brussels visit of this Group in December 2015 NCs are in a better position to develop or maintain links with the EU delegations in their countries. The TI-S MENA department and the AAWGT plan to build further their relations with officials of the International Association of Anti-Corruption Authorities (IAACA) and the Arab Administrative Development Organisation (ARADO).
- In **Egypt**, APHRA's survival as an organisation is in question due to the fact that the government has refused to let APHRA receive the funding it has managed to secure from foreign donors.

The main factors that will influence the sustainability of the project's achievements are:

- the political environment in each country (political stability, governments' willingness to reform or to be seen to reform, government policies towards civil society),
- the willingness of TI partners and other CSOs or other partners in their countries to continue their cooperation and
- the availability of funding in future.

The question of buy-in from other stakeholders and capacity development of the NCs have been discussed earlier in this report. There is no evidence that TI-S helped the NCs to develop their financial sustainability in the ways outlined in the project proposal. The assumption that research skills acquired through conducting the NIS study make NCs better able to carry out this research themselves in future<sup>17</sup> is questioned, at least in part, by some evidence gathered during this evaluation. In Lebanon the external researcher who was hired is now retired. In Egypt and Libya private consultancy companies were hired to conduct the research and in the case of Egypt this company was not involved in the advocacy that followed the study. In Morocco, TM felt that the only way to repeat a NIS study would be with TI-S funding. Considering the resource intensiveness of a NIS study, it is doubtful that NCs would want to or be able to afford to repeat the process in the comprehensive way that was implemented during this project.

## 4.6 Efficiency

Based on the provisional accounts available in July 2016, which have not been completed or audited yet<sup>18</sup>, the approximate total cost of this project was € 949,667, 8% below budget. (See Annex1 - *NIS MENA Project Financial Summary*). TI-S spent €385,540 of this amount (37.3%) with €136,490 in human resources (13.2%). In Jordan, Palestine and Tunisia costs ranged between € 112,956 and € 100,839 whereas in Egypt, Lebanon and Morocco they ranged between € 43,837 and € 73,880. No more

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<sup>17</sup> For example, in the project proposal, as above, p.28.

<sup>18</sup> The accounts will be audited in October 2016.



than 7% was allowed to cover administration costs and nothing was paid for local offices.

Funding came from the European Commission (90%) and TI-S (10%).

The delay in carrying out the Year 1 activities according to schedule is reflected in the accounts: € 233,573 was spent during Year 1 as opposed to € 716,094 during Year 2 (69.3% of the total). Apart from the delays in carrying out the research, described under Effectiveness, there were also delays in hiring staff and, overall, getting started.

Two out of the three NIS reports which were delivered on time – Egypt and Libya – were written by private consultancy firms. If their research costs were higher than what was paid to researchers through NGO partners, where long delays occurred, then it may have been more efficient to use the consultancy companies. In some cases, it might have also been more efficient to have offered better remuneration for the research so that the project could have attracted better researchers.

There is evidence that the reviewing process for NIS studies was also too long. Having too many reviewers involved in the process, more than would be required by TI-S procedures, and having to translate the draft report into Arabic, with various problems arising from the quality of the translation, were also aspects of inefficiency.

It is clear that not having the right research capacity within TI's partners when launching this project and having long reviewing processes caused some inefficiency in the project. Considering this inefficiency against the great advantage the NIS reports provided to TI's partners in terms of their profile and legitimacy by co-owning the reports, the balance tips in favour of having had the reports produced or managed by TI partners rather than external consultants.

It is possible that a different approach to NIS studies, namely one where only a few "pillars" are investigated and the reviewing process takes less time and involves fewer people, would have reduced costs.

The project had a clear management line between TI-S and each Chapter and this seems to have worked well in most cases. There is evidence of only one NC feeling that certain decisions should have been left to them alone and not involved TI-S. Most NCs have reported that they felt very supported by TI-S staff particularly so when difficulties arose. The support was available from different staff at TI-S and some NCs reported that they could be in daily contact and receive quick responses to their questions. If this support cost TI-S more staff time than it had envisaged, this support also contributed to the effectiveness of the project.

The sensible choice of advocacy objectives by the NCs and having sometimes worked through coalitions or in partnership with other stakeholders in their countries contributed to greater efficiency in the project.

Risks were identified properly in the project proposal, but their mitigation strategies did not prove sufficient in all cases. Some problems proved larger than what had been anticipated. These problems/risks included the political context, which, in some cases, was not conducive to reform or allowing civil society to influence policies, difficulties in finding/losing staff, difficulties with local advisory groups, problems with collecting data, difficulties around deadlines, which in the end resulted in launching NIS reports late.



This evaluation is not in a position to state whether the same results could have been achieved with fewer resources as the scope of this evaluation did not allow us to draw such conclusions. It has already been stated earlier (under Methodology-Limitations) that we did not have enough evidence to answer some questions related to value for money, such as whether some activities could have been conducted at a lower cost. Therefore, it is with this qualification that we can say *only in very broad terms* that, considering all the project's research and advocacy outputs and its advocacy successes in six countries plus at the regional dimension, overall this project appears to have been good value for money.

## 5 Lessons Learned

The earlier section on **how the NIS project could have been improved, in hindsight**, points to some of the lessons learned from this experience by NCs and TI-S alike, particularly regarding the depth and breadth of scope in the NIS studies and the need to show flexibility in the approach in future. Other lessons learned include:

- Being affiliated to an international organisation like TI is a strength for partners in the region not only because of the funding but also because of the kudos. It also helps bring anti-corruption actors across the region together in ways that they would not have been able to do themselves.
- The NIS study should have been treated as a planning tool for an advocacy strategy spanning 5 or more years, not as a project in itself. It is a means to an end, not an end in itself. This was the intention, but difficulties in carrying out the research made the NIS study feel as if it was an end in itself.
- Rather than assuming that the NIS approach fits all contexts and is useful everywhere, start instead by first working out with each Chapter a strategic approach about how *they* would like to engage on corruption risks in their countries.

## 6 Recommendations

To TI-S and National Chapters/partners:

1. In future apply the NIS approach more flexibly in each country. Design it together in ways that suit better the Chapters' needs and their environments (e.g. by focusing on only a few relevant pillars or by updating the studies as frequently as the Chapters require them).
2. Develop together new analytical tools to allow for context analysis that considers power relations and changing dynamics related to corruption, and the relationship between corruption and gender or between corruption and other social categories.
3. Build on the NIS research experience of this project by bringing MENA researchers together for peer learning, or exploring the possibility of peer reviewing among them, or setting up an Arab NIS research review committee.
4. Consider how TI's international standing could help towards offering protection to people who take great personal risks and whose safety is threatened as a result, in their fight against corruption in the MENA region.

To TI-S:

5. Repeat visits to MENA countries by TI's highest officials such as its chairperson or executive director with a view to meeting with the heads of states in these



countries. Such high level contacts have proven beneficial to anti-corruption efforts in the past, as was the case in Jordan.



## Annex 1 – NIS II MENA Provisional Project Financial Summary (as on July 2016)

	Budget	Expenditure									
		Year 1	Year 2	Years 1+2	Years 1+2	Years 1+2	Years 1+2	Years 1+2	Years 1+2	Years 1+2	Years 1+2
		All Locations			Years 1+2 TI-S and Libya	Egypt	Jordan	Lebanon	Morocco	Palestine	Tunisia
Human resources	315,890	101,711	183,465	285,176	136,490	11,420	25,714	23,084	27,034	35,016	26,419
Travel	63,474	6,558	52,279	58,837	55,206	791	805	-	692	182	1,161
Equipment & supplies	3,720	576	3,772	4,348	2,938	496	-	-	695	220	-
Other costs, services	532,756	100,117	401,614	501,731	190,906	31,130	67,478	35,959	45,459	65,421	65,377
Other (technical)	49,150	19,209	18,238	37,447	-	-	17,447	-	-	-	20,000
<b>Subtotal direct eligible costs</b>	<b>964,990</b>	<b>228,171</b>	<b>659,368</b>	<b>887,539</b>	<b>385,540</b>	<b>43,837</b>	<b>111,445</b>	<b>59,043</b>	<b>73,880</b>	<b>100,839</b>	<b>112,956</b>
Administrative costs	67,549	5,402	56,726	62,128							
<b>Total accepted costs</b>	<b>1,032,539</b>	<b>233,573</b>	<b>716,094</b>	<b>949,667</b>	<b>385,540</b>	<b>43,837</b>	<b>111,445</b>	<b>59,043</b>	<b>73,880</b>	<b>100,839</b>	<b>112,956</b>

These figures are based on accounts, which have not yet been completed or audited. Costs related to project work on Libya are included in the TI-S figures.



## Annex 2 - Sources

### Interviews

#### Egypt

██████████, project coordinator from January to February 2016, and ██████████, project coordinator from March till May 2016, the Arab Programme of Human Rights Activists (APHRA), joint interview, Skype, 31 July 2016

#### Jordan

██████████, Al-Share'e (The Street) theatre, phone call, 3 August 2016

██████████, Head of News, Roya TV, phone call, 31 July 2016

██████████, Governmental Coordinator for Human Rights, Office of the Prime Minister, phone call, 27 July 2016

██████████, law student (participant in the “moot courts” and debates), Petra University, phone call, 27 July 2016

██████████, current Youth Coordinator (former Project Coordinator), RASHEED, Skype, 24 July 2016

██████████, Integrity and Anti-Corruption Commission, phone call, 3 August 2016

██████████, Director, Al Hayat Centre – CSO fighting corruption, phone call, 27 July 2016

██████████, colonel, Judicial Police Council, phone call, 31 July 2016

██████████, staff, RASHEED, Skype, 24 July 2016

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Participants:

1. ██████████
2. ██████████
3. ██████████
4. ██████████
5. ██████████

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Participants:

1. ██████████ (Al-hadath newspaper)
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## Annex 3 – Interview Questions

Evaluation questions in the ToRs	Additional or related questions
<p>Relevance</p> <p>To what extent was the project suitable to the priorities and policies of the target groups (implementing partners), TI-S and the donor organisation [the European Commission]?</p> <p>To what extent was the NIS approach suitable to addressing the corruption risks in the target countries?</p>	<ul style="list-style-type: none"> <li>• How did the NIS process fit with existing anti-corruption work in each country? How did it add value to these efforts?</li> <li>• How was the process adapted or affected by changes in the context in the different countries?</li> <li>• To what extent was the design of the intervention in each country based on an analysis of the factors and actors in that context which/who are key to creating or addressing corruption risks (e.g. a power analysis)?</li> <li>• To what extent did this inform the selection of who was involved in the initiative and whom it sought to influence?</li> <li>• Did the project take into account the different needs of men and women or of other social categories?</li> </ul>
<p>Impact: The positive and negative changes produced by the project directly or indirectly both intended and unintended.</p> <p>What have been the key outcomes achieved so far as a result of this project and how does this compare with what was expected?</p> <p>What changes has the project achieved in terms of strengthening the implementing partners and civil society as leading actors in addressing corruption issues?</p> <p>How did the project add value to the outcomes/impact achieved?</p>	<ul style="list-style-type: none"> <li>• Whose understanding of the existing integrity system changed as a result of the NIS process and in what way? <ul style="list-style-type: none"> <li>- <i>Internal stakeholders</i> – those who participated in the initiative e.g. staff, partners, allies</li> <li>- <i>External targets</i> – e.g. government, media, public</li> </ul> </li> <li>• What have actors done differently as a result of this changed understanding (e.g. new initiatives or campaigns)?</li> <li>• What wider changes in the country's anti-corruption struggle have been achieved as a result of this (e.g. changes in government policy or practice)?</li> <li>• How significant were the achieved changes?</li> <li>• Were these changes expected or were there any unintended or unexpected changes?</li> <li>• Were there other interventions or other events that contributed to these changes? If so, what was the distinctive contribution of this project?</li> </ul>
<p>Effectiveness: How far the intended outcomes were achieved in relation to targets set in the original project proposal and national plans</p> <ul style="list-style-type: none"> <li>• Have the interventions achieved or are they likely to achieve objectives?</li> <li>• What were the major factors influencing the achievement or non-achievement of the objectives?</li> </ul>	<ul style="list-style-type: none"> <li>• What were the expected outcomes in each country as set out by the original project proposal and national plans?</li> <li>• Were these outcomes set appropriately and to what extent were they achieved?</li> <li>• Were the right outputs and activities chosen to achieve the outcomes?</li> </ul>



<ul style="list-style-type: none"> <li>• How effective and appropriate was the project approach?</li> <li>• With hindsight, how could it have been improved?</li> </ul>	<ul style="list-style-type: none"> <li>• Were there noticeable differences in achievement between countries? What factors may have helped or hindered the project achieve its objectives in different contexts?</li> <li>• What lessons have been learnt from NIS approach in each country?</li> <li>• How could the NIS approach be improved?</li> <li>• What were the National Chapters able to achieve, which they could not have achieved without the NIS project?</li> </ul>
<p>Efficiency: How far funding, personnel, regulatory, administrative, time, other resources and procedures contributed to or hindered the achievement of outputs.</p> <ul style="list-style-type: none"> <li>• How well did the partnership and management arrangements work and how did they develop over time?</li> <li>• How were implementing partners involved in project management and how effective was this and what have been the benefits of or difficulties with this involvement?</li> <li>• Were the risks properly identified and well managed?</li> <li>• Overall, did the project represent good value for money?</li> </ul>	<ul style="list-style-type: none"> <li>• Were the best results achieved (in terms of quality and scale of project benefits to target groups and changes in policies) with the money and other resources that the project had?</li> <li>• Could the same results have been achieved with fewer resources? What other approaches would have been less costly?</li> </ul>
<p>Sustainability: Potential for the continuation of the impact achieved</p> <ul style="list-style-type: none"> <li>• To what extent are the TI implementing partners able to ensure the sustainability of the project outcomes but integrating into future work e.g. advocacy strategies/project design.</li> <li>• What were the major factors influencing the achievement or non-achievement of sustainability of the project?</li> <li>• What are the mechanisms in place (or planned) to ensure that achieved results are maintained and built upon by the implementing partners, governments and / or other relevant stakeholders?</li> </ul>	<ul style="list-style-type: none"> <li>• What are the expectations of TI's partners in each country and those of the local coalitions?</li> <li>• How could the TI coalitions achieve their objectives in each country beyond the life of this project?</li> <li>• What mechanisms were put in place for this?</li> <li>• What plans do NCs have to continue NIS work in future?</li> </ul>