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Executive Summary

The Integrity, Mobilisation, Participation, Accountability, Anti-Corruption and Transparency (IMPACT) grant is a 4-year programme, implemented by the Secretariat of Transparency International (TI-S) and 12 of its National Chapters/Chapters in formation (NC) across Latin America, Caribbean and Sub-Saharan Africa (Argentina, Colombia, the Democratic Republic of Congo (DRC), Ghana, Guatemala, Honduras, Jamaica, Mozambique, Nigeria, Peru, Trinidad and Tobago and Venezuela). The programme is funded through a grant of CDN 13,410,805 (EUR 8,678,173) provided by Global Affairs Canada, and is structured around three outcome areas:

1. Empowered people, groups and communities (including women and marginalized groups) demonstrating that corruption can be challenged effectively – outcome 1100
2. Improved and gender sensitive anti-corruption policy and practice by local, national and regional public institutions, including on security – outcome 1200
3. Increased commitment to transparency, accountability and integrity in business practice – outcome 1300

The programme also emphasizes that gender awareness should be an integral concern. Approximately 63 per cent of the programme funds are channelled to NCs to finance activities, salaries and other operating costs at domestic level. The remaining funds finance salaries and operating costs at TI-S, and global and regional activities.

With the aim of improving performance for the remaining time left within the grant and learn lessons that could inform other programmes, TI-S commissioned a mid-term review of the programme which used two methods for collecting data: document analysis and interviews. Interviews were conducted with TI-S IMPACT grant Management Team; TI Managers of similar and cooperating grants, Global Corruption Barometer, SAFE and Social Accountability programmes; the Regional Advisors; IMPACT grant Focal Points in the National Chapters; staff and beneficiaries in two selected National Chapters (Ghana and Trinidad and Tobago). The analysis of the results takes the TI’s Impact Matrix into account.

Context

The NCs implementing the IMPACT programme differ in many aspects. In terms of the length of their membership in the movement, some are not yet a fully accredited chapter. Others have been accredited for as long as TI has been in operation. The operating model of IMPACT chapters can be described as falling within three main types:

- Those which follow a standard professional non-governmental organisation (NGO) model, based on the work of mostly paid staff and funded solely by traditional donors.
- Those chapters with mostly paid staff, with minimal or no volunteer support, receiving funds from traditional donors and conducting some commercial activities -- such as consultancy to the private sector on reviewing compliance with anti-corruption mechanisms for companies.
- Those chapters with mostly on pro-bono or volunteer work, with very low levels of funding from traditional donors or from any other source.

The size of the budget and the operating model of chapters, impact on their level of financial dependency from resources coming from TI-S.
An overview of the participating NCs’ strategies also shows variation. Some chapters’ strategies follow more or less closely that of the movement. Other chapters strategic documents are descriptions of a few specific programmes implemented, with no reference to the TI movement. Another difference is that some strategy documents cover up to 10 years of activities, while others are similar to action plans, covering just one year. The variety encountered among chapters implementing activities financed through IMPACT reinforces the perception that one of the programme’s main characteristic is that it needs to respond and adapt to 12 completely different realities.

Key findings

The key findings identified by the review are presented against five evaluation criteria: relevance, impact, effectiveness, efficiency and sustainability. The gender dimension is analysed within each evaluation criterion.

Relevance

This section discusses issues of coherence and the degree to which the grant reinforces the priorities of TI National Chapters’ and TI-S’ work. It also assesses the extent to which the activities and outputs funded by the grant are consistent with the expected outcomes in the original logic model.

The results suggest that alignment exists toward strategic work areas, and for many chapters it is integral to the chapters’ pursuit of financial stability. The main characteristics of the programme – which are also one of the programme’s strengths - are likely relevant for most organisations working in fighting corruption: i.e. flexibility, which allows participating NCs to choose the activities they will implement; breath of scope, so as to be relevant to any organisation working on anti-corruption; and geographical coverage, enabling some TI NCs to access funding traditionally outside of their reach.

Two elements of this grant are key to providing a positive response on whether the programme is relevant to address corruption. The first is the fact that the grant reaches out to all stakeholders who need to be targeted in any anti-corruption effort. The other element is that the grant provides the possibility of supporting individuals or organisations that come forward with information about corruption, to address issues of impunity. The grant has proven to allow for both elements.

The programme initial objectives were appropriate, to a certain degree. Some countries experienced political changes that made them restructure certain outputs. Some experienced delays or reorganised activities because of partners or beneficiaries. The discrepancy between the problems encountered in implementation and the appropriateness of initial objectives may be linked to poor risk assessment at programme design. It may also be an incapacity to mitigate risks that materialised. This needs to be considered from two perspectives. One is that a long-term multi-country programme like IMPACT is bound to be designed and implemented under significant uncertainty. This does not have a negative impact to the programme considering the flexibility built into this grant, which allows for readjustments. On the other hand, chapters still need close guidance in the planning stages of their proposals. They are the best placed entities to understand the context in which they operate, but their personnel may not be trained in risk assessment or on evaluating the level of ambition they may be able to deliver on.
Impact

This section assesses the degree to which the grant's expected outcomes are being achieved. In addition, it assesses any unintended outcomes, the degree to which the IMPACT programme and NCs have a functioning theory of change, and how can outcomes be mapped against the TI Impact Matrix.

Most results are being achieved in outcome area 1100. Some results have been achieved with the work with public institutions (outcome 1200), however the outcomes expected in this area may take longer to achieve, and are not solely dependent on the chapter's efforts. Business integrity activities (outcome 1300) are being pursued by half of the chapters and receive a lower percentage of funds – hence, have fewer results to show. Nevertheless, even in countries where activities are being pursued, results in outcome 1300 are below program expectations.

Through a combination of the outreach efforts and reinforcement of ALAC capabilities (outcome 1100), NCs combined have been able to surpass by more than double the target number of cases they expected. The grant has also allowed to reach more people than anticipated, by more than 6-fold. Results on redress and resolution of cases has not had as impressive results as outreach and the support mechanisms (not many NCs have the capacity to go beyond providing legal advice to victims. This is likely because justice systems are notoriously slow, and in some contexts even hostile. The IMPACT grant has been essential to change through outreach in most of the NCs. Anti-corruption activism and community action has also given an important contribution towards behaviour change.

With the support of the TI-S regional advisors, overall NCs were able to surpass the expected activities related to submission of policy recommendations, awareness raising, and engaging with meaningful actors locally, nationally and regionally. However, only a minority of the cases reported specify concerns regarding gender issues. Still, the grant has had important contributions in suggesting improvement of processes. Contributions towards policy adoption and amendment, or improvement of enforcement of policies have been weaker. One reason can be that aside from advocacy, chapters have less control and influence over political and institutional change, as political actors yield considerably more power than individuals and communities, hence our finding of weaker contribution to change.

According to the NCs, the most noticeable added value of the grand is related to the ALAC and outreach work. In terms of outreach work, most chapters where in agreement that the IMPACT grant allowed them to expand into new geographic areas and reach a wider public. Chapters also appreciate the visibility and increased projection the grant has given them, nationally and internationally. This visibility has been crucial for the ability of gaining allies, particularly in the public sector. On the other hand, the stability and long duration of the grant has allowed to properly structure their strategic actions to follow through with activities.

There are also positive elements arising from particular chapters implementing more than one TI-S grant (e.g. ACTION, LAND and CRIMJUST). Chapters may collect data and produce evidence with funds from one grant and use this knowledge to work on advocacy financed by another grant. However, these benefits seem to be happening on an ad-hoc and reactive basis. Two better approaches would be either to include it into the IMPACT programme as an output (e.g. CRIMJUST), or involve the different programme manager in the planning process for grants that cover overlapping countries. One negative aspect of having more than one TI-S grant funding activities in the same country, however, is that it increases the financial dependency of that chapter on TI.
Effectiveness

This section assesses the degree to which outputs and activities were achieved at NCs and TI-S levels in relation to the targets set in the proposal, plans and grant agreements. It also assesses how realistic the initial outcome indicators were, how implementation has deviated from them, and how whether outcomes are likely to be achieved.

It is a challenge to identify baselines and targets that indicate progress per NC in the documentation related to the grant. There are five documents that show targets: Contracts signed between TI-S and NC; Annual contracts; PMF output Spreadsheet; CIDA’s PMF; and Result Matrices Combined for Y1 and Y2. The large amount of data collected is compiled in a non-uniform manner and the quality of targets as proposed by NCs varies with some being difficult to measure progress against. This means that some results may not be captured and some problematic areas may be unaddressed as they are not spotted.

Some chapters are reporting more activities undertaken than they have committed to in the contract. Some chapters have substituted one output for another. These were reported as having been undertaken as a result of legitimate difficulties. In at least one chapter’s it is difficult to show progress. A couple of chapters, still have either underperformed or are not monitoring results regarding some outputs. As such, the program would benefit from one single reporting mechanism that could more effectively track progress on achievement of targets.

Nine chapters have experienced a politically unstable scenario in one or both years of the initial programme implementation. This was the most common challenge impacting their capacity to deliver activities. Difficulties to get partners engaged are cited by 6 chapters and problems such as staff rotation, lack of qualified staff and other personnel issues are mentioned by 5 chapters as are security threats against staff/partners. TI-S has been flexible and understanding in their delays of implementation or in submission of data for monitoring and reporting purposes.

NCs mostly refer to their relationship with TI-S in positive terms. The main benefits chapters perceive they gain by their engagement in the movement are: the value of the international reputation of TI to advance their work domestically; the knowledge sharing network that allows access to ideas and experiences; the possibility of receiving financial support through the network. Some chapters’ characteristics, and the institutional reorganisation that TI-S has experienced throughout the implementation of this grant have also impacted the chapter’s capability to implement activities. Additionally, some chapters have said that TI-S has a limited understanding of the reality in which they operate. Other chapters stated that the reporting mechanisms for this grant are too cumbersome. Some reported issues with language, as many are Spanish (one French) speaking and all communication is in English. Some are less integrated in the movement. Finally, chapters also indicated that staff at TI-S is stretched beyond capacity and that certain technical expertise is not available anymore.

Efficiency

This section assesses the efficiency in the use of staff and resources, the value for money provided by the grant, identified risks and their management. It also assesses the level and adequacy of TI-S support to NCs, how it evolved over time, as well as performance of implementing partners under the grant.

Staff in TI-S acknowledge that the reorganisation and redundancy processes led to the loss of expertise and reduction in staff numbers. This resulted in some individuals becoming responsible for additional
work. There is also lack of clarity within the new designated teams and positions and a perception of forced separation of activities (particularly for cross regional programmes like IMPACT that have domestic, regional and global activities). Given that only two staff engage more closely with the grant, which includes chapters with different structures and levels of integration in the movement, they are unable to develop in depth knowledge of each chapter receiving the grant. This makes it difficult to provide tailored support beyond monitoring spending levels, annual plans and reporting.

Chapters responded positively in terms of value for money citing that the grant allowed them to build on existing work and capitalise the impact of different projects. It also enabled chapters to enlarge their portfolio and pay for staff salaries. A side effect is that IMPACT related work has created demands that sometimes chapters cannot meet.

The best performing chapters seem to be those that have IMPACT activities most aligned to their traditional activities, with clear strategic objectives and good technical capacity. This is in line with one of the strengths of the grant: the fact that it boosts activities chapters already had in place. This assessment raises two points for consideration: one is that good performers require technical capacity among staff. The other is that another of the positive features of the grant -- enabling chapters to enlarge their portfolio, entering into new topics and establishing new partnerships --- may have side effects: pushing some chapters outside their comfort zone and increasing the risks of failure of a particular activity or output.

**Sustainability**

This section discusses the dependency of NCs on funding from TI-S and other donors and their capacity to sustain results after the grant finishes. It also assesses how much of the work is likely to be integrated into the NCs’ future, and the main factors influencing sustainability of achieved outcomes.

Chapters have different levels of dependency to TI-S (or other funders) that are likely to influence the sustainability of the grant outcomes. Some chapters demonstrate financial independence from TI-S and other funders, and thus ability to continue to finance activities and sustain the outcomes beyond the grant. Others will need to scale down or halt activities, after the grant comes to an end. This is due to a multiplicity of reasons, including the particular context of the country, relative dependency of funding from TI-S, or little diversity in funding sources.

When chapters are working in areas where they have previous know how, the expectation is that, even if they scale down activities, the type of activities carried out will continue. This is true for awareness campaigns and training sessions. This allows for continuity in areas where follow-up is paramount to ensure maintenance of results achieved. There is the risk, however, that in certain cases momentum may be lost, and if activities are abandoned the results are lost. This risk is a possibility with work on social audit when it relies on volunteers for implementation.

Local recognition within countries, and prolonged relationships with public institutions improve sustainability of results. Likewise, for acceptance by local communities, and provision of credibility to government institutions when conducting joint activities, as they are conducive to ownership by communities and partner institutions. Additionally, the long-term nature of the grant has allowed for repetition of activities and routines, reinforcing knowledge and practices. Time has also been enough for some cases at ALACs to be resolved. Visibility and success have served to reinforce recognition of
credibility, facilitating the pursuit of future funding, as well as having continued request for activities. Finally, mainstreaming of activities is the area most likely to guarantee sustainability of some outputs, especially the ALAC.

Planning overall fails to present a clear scaling back of activities, in anticipation of the end of the grant, or a learning process on how to change it if presented with the possibility of extending the grant. Ideally none of the chapters should be planning to implement new activities in the next two years, but rather consolidating the ones that are under implementation. Otherwise, there will not be enough time for beneficiaries to take ownership and follow through, after the grant has ended.

**Lessons learned**

It should be noted that most of the lessons learned presented are in terms of internal good practices at TI-S or the NCs. Because the TI Impact Matrix privileges an outward look, there were fewer lessons relevant to it.

**Good practices at TI**

- Fundraising on behalf of chapters in middle- and upper-income countries (which otherwise would have difficulties accessing funds).
- Multi-country programmes (allows for larger funding and enables many TI chapters to engage in activities that are of the interest of the entire TI movement).
- Flexibility of programmes (in terms of areas of spending and reallocation of funds).
- Support a movement priority (ALAC).
- Using different grants to pool chapters or to boost one another (ACTION, LAND, CRIMJUST).
- Positive impact of Africa regional support structure (due to contextual knowledge and essential support to execution of domestic activities).

**Good practices from NCs**

- Learning exchange between chapters.
- Strength in networks.
- Reinforcing areas where National Chapters excel.
- Good collaboration with public institutions (the movement’s approach, which favours a non-antagonistic relationship with public institutions).
- ALAC Steering committee in Ghana (composed of the most important public institution to which complaints are forwarded).
- Commitment and tenacity (in pursuing tirelessly the public authorities responsible for providing victims with a response or redress).
- Cooperation between ALAC and investigative journalism (to assist in redress activities).

**Recommendations**

Recommendations are made on where the grant should focus its efforts before it ends, as well as some actions to adopt beyond the grant. Only priority recommendations are presented below (for full list see recommendation chapter in the report).
Immediate

- Stop growing and consolidate
- Improve one single monitoring instrument to consistently show progress achieved in an overview manner
- Boost execution of ‘low hanging fruits’ in chapters falling behind
- Prepare postcards that illustrate successful stories of impact achieved with this grant
- Have a gender and corruption specialist available to support chapters

Beyond the grant

- Improve future proposals and project plans
- Provide training or exchange on litigation
- Provide more substantive support to chapters in development of proposals, programme planning and execution of activities
- Support to chapters with weaker funding base to diversify funding sources
- TI-S to monitor closely and provide support to chapters when entering new topics/areas
- TI-S to include gender mainstreaming/gender and corruption as a key strategic area
Introduction

The Integrity, Mobilisation, Participation, Accountability, Anti-Corruption and Transparency (henceforth referred to as IMPACT programme or grant) grant is a 4-year programme, implemented by the Secretariat of Transparency International (TI-S) and 12 of its National Chapters/Chapters in formation (NC) across Latin America, Caribbean and Sub-Saharan Africa. Running from 2016 to 2020, the programme is funded through a grant of CDN 13,410,805 (EUR 8,678,173) provided by Global Affairs Canada. The programme is structured around three outcome areas:

1. Empowered people, groups and communities (including women and marginalized groups) demonstrating that corruption can be challenged effectively – outcome 1100
2. Improved and gender sensitive anti-corruption policy and practice by local, national and regional public institutions, including on security – outcome 1200
3. Increased commitment to transparency, accountability and integrity in business practice – outcome 1300

Approximately 63 per cent of the programme funds (around EU 5 million) are channelled to NCs to finance activities, salaries and other operating costs at domestic level. The remaining funds finance salaries and operating costs at TI-S, and global and regional activities that respond to the outcomes of the programme. Participating NCs are those located in Argentina, Colombia, the Democratic Republic of Congo (Congo DRC), Ghana, Guatemala, Honduras, Jamaica, Mozambique, Nigeria, Peru, Trinidad and Tobago and Venezuela.

In terms of substance, outcome areas (1100, 1200 and 1300) provide the framework around which NC implement their activities. Outcome 1100, which includes the work of Advocacy and Legal Advice Centres, ALACs, (an important component of TI-S’ 2020 strategy, as will be discussed), consumes the largest amount of funds: 54 per cent of the total. Outcome 1200, addressing the public sector, responds for around 36 per cent while 1300, which focuses on the private sector, consumes 9.7 per cent. It is within this framework that NCs align their IMPACT financed work. Each year, annual plans are discussed between NCs and TI-S and set the workplan for the next 12-month period.

The programme emphasizes that gender awareness should be an integral concern. The issue appears in at least two outcomes (1100 and 1200). This element takes the form of special attention to women (as well as other vulnerable groups) in activities such as support mechanisms for individual victims of corruption, development of awareness raising campaigns targeting such groups and partnerships with organisations involved in gender issues, at the domestic and regional level.

In 2018, the programme is in its 3rd year of implementation. With the aim of improving performance and learning lessons, TI-S commissioned a mid-term review of the programme. The objectives of this review as stated in the terms of reference published by TI-S in June 2018 are:

- To provide an objective assessment of the achievements and results of the IMPACT grant;
- To identify weaknesses and strengths of the grant;

1 Calculated based on figures per output areas and per national chapter, provided by TI-S.
2 The Government of Canada’s feminist international assistance policy has gender equality and the empowerment of women and girls as a core area (Global Affairs Canada 2017).
• To generate lessons learned and good practices from the grant’s work;
• To provide clear and forward-looking recommendations.

In order to respond to these objectives, a set of questions were presented by TI-S and shape the analysis in this report. These questions are organised around the OECD Development Assistance Committee monitoring and evaluation criteria: relevance, impact, effectiveness, efficiency and sustainability (OECD 2010). The issue of gender awareness is assessed throughout these criteria. The work for this mid-term review was conducted from the last week of July to the last week of September 2018 and the team involved included an anti-corruption expert and a gender/monitoring and evaluation expert.

This report provides responses to the questions raised by TI-S and offers some other insights, such as the relationship and synergies that the IMPACT grant has had with other grants run by organisation. This is discussed in more detail in the methodology section. Following this introduction, the report is structured in the following order:

• Methodology
• Context
• Key Findings including strengths and weaknesses
• Lessons learned and good practices
• Recommendations
• References
• Annexes
Methodology
This review used two methods for collecting data and information: document analysis and interviews. The following groups were interviewed: TI-S IMPACT grant Management Team; TI Managers of the CRIMJUST, MINING, ACTION, SAFE, Global Corruption Barometer and Social Accountability programmes; the Regional Advisors for Latin America & Caribbean and Africa; IMPACT grant Focal Points in each of the National Chapters; staff and beneficiaries in two selected National Chapters (see complete list of informants in Annex).

Two chapters were selected to be visited: Ghana and Trinidad and Tobago. The choice of National Chapters to visit was based on the following criteria: dependency of the chapter on the IMPACT grant funds, in relation to their overall budget; level of effort needed to achieve expected results; and security risks.

Document review
The review of background documents focused on the following:
- Chapter strategy documents, for all 12 chapters;
- TI 2020 strategy ‘Together against corruption’ and implementation plan;
- TI 2015 strategy;
- IMPACT grant documents (including contracts between TI-S and donor and TI-S and chapters, as well as budgets and annual plans);
- Grant performance reports from each chapter and monitoring material prepared by TI-S.

Instruments
A number of interview guidelines were developed, for the different target informants (see full instruments in Annex):
- TI-S Interview Guideline – aimed at the IMPACT grant management team;
- TI-S Interview Guideline for similar programs – aimed at the MINING and ACTION projects;
- Focal point self-assessment questionnaire – to be completed by the IMPACT program focal points at National Chapters (this was also applied to focal points in the visited chapters);
- National Chapter Interview Guideline – used to interview staff involved with the IMPACT grant in the visited National Chapters;
- National Chapter Beneficiary Interview Guideline – used to interview beneficiaries of the IMPACT grant in the visited National Chapters. Three types of beneficiaries were targeted: individual ALAC complainants with both satisfactory and unsatisfactory outcomes to their complaints; vulnerable groups or individuals; and beneficiary organizations.

Moreover, during inception, the following programs that interact with IMPACT were presented to the consultant team at a meeting in TI-S on 30-31 July or via phone calls: CRIMJUST, SAFE, Global Corruption Barometer and Social Accountability. Monitoring, Evaluation and Learning, and Finance and Accounting team managers were also consulted.

Ethics and anonymity
Corruption is a sensitive issue, and there are a number of ethical considerations in this regard. People denouncing corruption, whether victims or witnesses, have a legitimate expectation of being protected...
from harm after providing their testimony. In order to respect this, beneficiaries were guaranteed privacy for their interview. Additionally, and in order to respect their anonymity, none of the beneficiaries’ name was registered. In relation to information provided by institutional respondents, a reasonable effort is also made to protect their identity in the report text.

**TI Impact Matrix**

The analysis of results will consider TI’s Impact Matrix. The premise of the impact matrix is that different components contribute to achieve change, and context is central to understanding performance. The matrix focuses on change that TI aims to achieve: Policy & institutional as well as behaviour change. It also includes outreach and awareness as a third component. As such, the analysis in this review ascertains the extent to which the IMPACT grant has:

- Contributed to achieve Policy and Institutional Change - “to ensure that intergovernmental institutions, governments, political parties and businesses have all the necessary mechanisms, policies or laws in place to redress and prevent corruption, sanction corrupt behaviour, and promote good governance”;
- Contributed to achieve Behaviour Change – so that “individuals, communities, civil society organizations and social movements act systematically to promote global good governance and prevent corruption.”
**Context**

The IMPACT programme is one of TI-S largest grants, disbursing around EUR 8.6 million from 2016 to 2020 (the second largest programme, ACTION, is financed by the European Commission through a grant of approximately EUR 6 million over the same period). Given their strategic importance, such grants are managed within TI-S ‘Strategy and impact team’, closely overseen by one of the organisation’s most senior managers (see Fig. 1).

The 2020 Strategy was endorsed in 2015 by the movement’s members and Board of Directors after a period of negotiations in 2014. The year of 2014 coincides with the period in which TI was drafting and submitting to the potential donor, Global Affairs Canada, the first proposal for the IMPACT programme – which was not funded until 2016.

It is no surprise that many of the issues raised by the 2020 Strategy also feature in the IMPACT programme. The 2020 Strategy made the pursuit of corruption cases a main component of the TI movement’s priorities. Even if many NCs had previous experience with supporting victims and activism, the 2020 Strategy sets the movement to enable victims and whistle-blowers to come forward to find redress and encourages chapters to support strategic corruption litigation (TI 2015, p. 10 and 14). These activities are pursued mainly through the work of ALACs, which TI-S has more actively supported since the 2020 Strategy. The table below summarises the 2020 Strategy features:

**Table 1: TI’s 2020 strategy Together Against Corruption**

<table>
<thead>
<tr>
<th>2020 Strategy Main areas</th>
<th>People and Partners</th>
<th>Prevention, Enforcement and Justice</th>
<th>Strong movement</th>
</tr>
</thead>
<tbody>
<tr>
<td>Create demand for accountability and empower action</td>
<td>Promote prevention and enforce anti-corruption standards</td>
<td>Share what works to stop corruption</td>
<td></td>
</tr>
<tr>
<td>Engage partners and inspire leaders</td>
<td>End impunity for corruption</td>
<td>Build a sustainable movement</td>
<td></td>
</tr>
<tr>
<td>Protect anti-corruption activists</td>
<td></td>
<td>Ensure the relevance of the movement</td>
<td></td>
</tr>
</tbody>
</table>


Many of the changes the TI movement pursues with its 2020 strategy appear as outcomes or outputs at the IMPACT programme logical framework. A review of the logical framework shows it is closely responding to the 2020 Strategy in almost all dimensions of its 3 main areas:

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3 TI-S 2015 Strategy already proposes that the movement supports victims to seek redress in its priority 1 (TI 2011) and some NCs have had ALACs operating for as long as 2008 – the case of Guatemala’s Accion Ciudadana.
### Table 2: Overlap between TI’s 2020 Strategy three dimensions and IMPACT grant outputs*

<table>
<thead>
<tr>
<th>People and Partners</th>
<th>IMPACT grant</th>
<th>Prevention, Enforcement and Justice</th>
<th>IMPACT grant</th>
<th>Strong movement</th>
<th>IMPACT grant</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Create demand for accountability and empower action</strong></td>
<td>Output 1111 and 1112 (Support mechanisms for victims and witnesses of corruption/ Redress for corruption on strategic cases)</td>
<td><strong>Promote prevention and enforce anti-corruption standards</strong></td>
<td>Output 1211 (National and local public integrity assessment and campaigns conducted)</td>
<td><strong>Share what works to stop corruption</strong></td>
<td>Output 1131 (Surveys conducted and reports disseminated on experiences with and attitudes towards corruption)</td>
</tr>
<tr>
<td></td>
<td>Output 1121 and 1122 (Know your rights campaign informing citizens about their rights/Partnerships with other organisations)</td>
<td></td>
<td>Output 1212 (Reports and campaigns on the gaps between security and justice standards)</td>
<td></td>
<td>Output 1211 (National and local integrity assessment and related campaigns conducted)</td>
</tr>
<tr>
<td></td>
<td>Output 1131 (Surveys conducted and reports disseminated on experiences with and attitudes towards corruption)</td>
<td></td>
<td>Output 1221 (Advocacy material targeting regional bodies based on newly generated knowledge)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Engage partners and inspire leaders</strong></td>
<td>Output 1122 (Partnerships with other organisations)</td>
<td><strong>End impunity for corruption</strong></td>
<td>Output 1112 (Redress for corruption on strategic cases)</td>
<td><strong>Build a sustainable movement</strong></td>
<td>Output 1123 (Set up mechanism to develop and sustain a supporter’s base)</td>
</tr>
<tr>
<td><strong>Protect anti-corruption activists</strong></td>
<td>Output 1111 and 1112 (Support mechanisms for victims and witnesses of corruption/ Redress for corruption on strategic cases)</td>
<td></td>
<td></td>
<td><strong>Ensure the relevance of the movement</strong></td>
<td></td>
</tr>
</tbody>
</table>

Source: TI (2015): 2020 Strategy Together Against Corruption; IMPACT programme logical model date 06/08/2016. * There are other activities financed with IMPACT funds that do not appear as specific outputs in the IMPACT grant logical model, hence they are not included in this table.

However, even if IMPACT’s logic model appears closely aligned to the 2020 Strategy, to understand the degree to which this alignment is happening in practice and contributing to delivering the Strategy, one needs to see how NCs put the IMPACT programme into place. This is so because a much larger share of the programme happens through activities implemented by its 12 NCs when compared to what is
In this regard, this section follows with an overview of the characteristics of the NCs implementing this grant and their strategy documents.

**Table 3: Some features of IMPACT participating National Chapters**

<table>
<thead>
<tr>
<th>Country/ Chapter name</th>
<th>Membership in the TI movement</th>
<th>Paid staff</th>
<th>Board members</th>
<th>Main expenses incurred with IMPACT funds*</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Argentina – Poder Ciudadano</td>
<td>since 1993</td>
<td>5 male</td>
<td>5 male</td>
<td>1,2,4,4a, 5,7,8,9</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>6 female</td>
</tr>
<tr>
<td>2 Colombia – Transparencia por Colombia</td>
<td>Since 1998</td>
<td>15 male</td>
<td>6 male</td>
<td>1; 4; 4b; 5; 6; 8</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>32 female</td>
</tr>
<tr>
<td>3 Democratic Republic of Congo - Ligue Congolaise de Lutte contre la Corruption (LICOCO)</td>
<td>chapter in formation</td>
<td>9 male</td>
<td>3 male</td>
<td>1;2;3; 4;4a;5;5a;6; 7</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>6 female</td>
</tr>
<tr>
<td>4 Ghana – Ghana Integrity Initiative</td>
<td>Since 2005</td>
<td>7 male</td>
<td>7 male</td>
<td>1; 2; 3; 4; 4a; 5a; 6; 7; 8; 9; 9a</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>7 female</td>
</tr>
<tr>
<td>5 Guatemala - Acción Ciudadana</td>
<td>since 2006</td>
<td>10 male</td>
<td>4 male</td>
<td>1;2;4;4a;5;6; 7;8,9,9a</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>8 female</td>
</tr>
<tr>
<td>6 Honduras - Asociacion para una sociedad mas justa</td>
<td>Since 2015</td>
<td>58 male</td>
<td>5 male</td>
<td>1; 2; 3; 4; 4a; 6; 7; 8</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>78 female</td>
</tr>
<tr>
<td>7 Jamaica – National Integrity Action</td>
<td>since 2015</td>
<td>7 male</td>
<td>6 male</td>
<td>1; 4; 8; 9; 9a</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>9 female</td>
</tr>
<tr>
<td>8 Mozambique - Centro de Integridade Pública (CIP)</td>
<td>Since 2011</td>
<td>8 male</td>
<td>4 male</td>
<td>4; 3; 5a; 6; 8</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>8 female</td>
</tr>
<tr>
<td>9 Nigeria - Civil Society Legislative Advocacy Centre (CISLAC)</td>
<td>chapter in formation</td>
<td>5 male</td>
<td>6 male</td>
<td>1; 3; 4; 4a; 4b; 6; 7; 8; 9; 9a</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>12 female</td>
</tr>
</tbody>
</table>

4 Approximate EURO 2,75 million of the grant are spent by staff at TI-S. These funds pay for staff to support NCs in many areas: for example, developing chapters’ security capacity (through training on security measures) and guidance on the implementation of domestic and regional activities. A few substance related activities funded by IMPACT are run by TI-S staff (the collection of data in LAC for the survey Global Corruption Barometer, fully funded by IMPACT, and a lessons-learned exercise on the movement’s experience with social auditing).
The NCs involved in implementing the IMPACT programme differ in many aspects (see Table 3 above). In terms of the length of their membership in the movement, some, like the Ligue Congolaise de Lutte contre la Corruption (LICOCO) in Congo DRC or the Nigerian Civil Society Legislative Advocacy Centre (CISLAC) are not yet a fully accredited chapter. Others have been accredited for as long as TI has been in operation, such as the ‘Poder Ciudadano’, in Argentina.

They differ also in their model of operation and budgets. Trinidad and Tobago Transparency Institute, a chapter since 2000, has 3 paid employees and relies on its pro-bono/volunteer board of directors (8 posts filled by individuals who rotate every three years) to deliver most of its activities. On the other side are chapters such as Honduras ‘Asociacion por una sociedad mas justa’, accredited in 2015, with more than 100 paid staff. The size of budgets also varies significantly.

The operating model of IMPACT chapters can be described as falling within three main types: those which follow a standard professional non-governmental organisation (NGO) model, based on the work of mostly paid staff and funded solely by traditional donors (bilateral, multilateral, foundations and other international organisations). Examples include chapters in Ghana and Mozambique. An intermediary model includes chapters which function based mostly on paid staff, with minimal or no volunteer support, receiving funds from traditional donors and conducting some commercial activities -- such as consultancy to the private sector. This model includes chapters in Guatemala and Colombia. On the other extreme are chapters whose work relies mostly on pro-bono or volunteer work, with very low levels of funding from traditional donors or from any other source, such as the chapter in Trinidad and Tobago.
The size of the budget and the operating model of chapters, impact on their level of financial dependency from resources from TI-S. Graph 1 below shows the level of dependency chapters have on IMPACT grant funds. Some chapters receive funds from other TI-S sources (other grants managed by the secretariat) so the proportion of dependency may be even higher. This will be discussed in the section about sustainability.

**Graph 1: Level of chapter dependency from IMPACT funds**

![Graph 1: Level of chapter dependency from IMPACT funds](image)

Source: IMPACT focal points questionnaires submitted to 12 chapters

Finally, an overview of the participating NCs’ strategies also shows variation. Even if the 2020 Strategy presents a broad enough frame around which NCs may easily include their local priorities, chapters’ strategies follow more or less closely that of the movement (see Table 3 below). For example, Trinidad and Tobago ‘Mandate of Hope Strategic Plan 2017-2020’ spells out the exact same 2020 strategy priority areas: People and Partners; Prevention, Enforcement and Justice, and Strong Movement. The chapter’s goals also follow the same sub-elements of the 2020 Strategy (described in table 1 above). On a different example, the strategy document of the Jamaican chapter reads like a description of a few specific programmes implemented over many years, with no reference to the TI movement or its priorities. It is also not easy to establish its main work areas.

Another difference is that some strategy documents cover up to 10 years of activities (Mozambique’s CIP), while others are similar to more or less detailed action plans, covering just one year (Peruvian and Venezuelan chapters). The variety encountered among chapters implementing activities financed through IMPACT reinforces the perception that one of the programme’s main characteristic is that it needs to respond and adapt to 12 completely different realities.
Table 4: Priority areas according to the strategies of IMPACT participating chapters including period covered*

<table>
<thead>
<tr>
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<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>People and Partners</td>
<td>Ethics and transparency</td>
<td>Corruption in politics</td>
<td>Institutional strengthening</td>
<td>Research</td>
<td>Raise awareness and empower citizens</td>
<td>Campaigning reaching out different actors</td>
<td>To build citizen capacity and awareness for sustained action against corruption</td>
<td>Extractive industries</td>
<td>Support to democratic processes</td>
<td>Transparency and access to information</td>
<td>People and Partners</td>
<td>Strategic investigation and data production and analysis</td>
</tr>
<tr>
<td>Prevention, Enforcement and Justice</td>
<td>Access to public information</td>
<td>Justice and sanctioning</td>
<td>Advocacy towards public authorities</td>
<td>Public education and capacity building</td>
<td>Advocacy to strengthen State institutions in transparency and fight against corruption</td>
<td>Movement to empower people to promote collective change</td>
<td>Promote justice sector anti-corruption programmes</td>
<td>Public private partnerships</td>
<td>Fight against corruption and promotion of transparency in public finances</td>
<td>Pursuit of strategic corruption cases</td>
<td>Prevention, Enforcement and Justice</td>
<td>Dealing with corruption complaints and organisational challenges</td>
</tr>
<tr>
<td>Strong movement</td>
<td>Access to justice</td>
<td>Private sector</td>
<td>Social mobilisation and establishment of partnerships with other NGOs</td>
<td>Advocacy</td>
<td>Monitoring to strengthen transparency in justice and security institutions</td>
<td>Advocacy to promote reform that benefits people</td>
<td>Support public capacity to deal with corruption victimization</td>
<td>Public income and expenses</td>
<td>Promotion of peace, security and better management of Migration &amp; IDPs</td>
<td>Advocacy on state bodies</td>
<td>Strong movement</td>
<td>Advocacy to improve public policies in the area of fight against corruption and to promote citizen empowerment</td>
</tr>
<tr>
<td>Power division</td>
<td>Public Sector</td>
<td>Fundraising</td>
<td>Cultivate anti-corruption behaviour in everyday lives</td>
<td>Support to the electoral and political party system in transparency and fight against corruption</td>
<td>Develop and support networks of key anti-corruption stakeholders</td>
<td>Democratic monitoring institutions and regulatory framework</td>
<td>Promotion of legal framework for environment</td>
<td>Public-private ethics and integrity</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Elections</td>
<td>Social control</td>
<td>Research</td>
<td>Promote enforcement of laws and standards</td>
<td>Institutional strengthening</td>
<td>Strengthen investigative journalism capabilities of media practitioners</td>
<td>Promotion of human development and social inclusion</td>
<td>Oversight of public management through citizen mobilisation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gender mention</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

Source: Strategy documents submitted in August and September 2018 by NCs participating in the IMPACT programme/ *The distribution of cells on this table should not be read as suggesting correspondence with the three main areas of TI-S 2020 Strategy. NCs priorities are simply listed as they appeared in their strategy documents.
NCs differ significantly in terms of human and financial capacity, institutional development and level of integration into the TI movement as well as interests and focus areas of work. These reflect the political context in which they operate. The IMPACT programme takes this variation into account as it allows a significant degree of flexibility for implementing NCs. Among the outcomes 1100, 1200 and 1300, NCs were free to choose how they would spend funds among several outputs possible. They were also free to choose working on just one or another outcome area, and not all of them – which is the case, particularly regarding outcome 1300 (only Colombia, Trinidad and Tobago, Nigeria and Peru chose to work on it\(^5\)). Finally, the donor has been understanding regarding reallocation of funds when there is significant underperformance (the case of Mozambique).

However, this diversity also poses challenges to programme managers in Berlin. Ensuring successful implementation of agreed workplans through such a heterogeneous group is difficult. Observing overarching results and aggregating data for the purpose of monitoring and reporting back to the donor is challenging. The programme resembles a collection of 12 domestic projects, with only one evident common thread, the Advocacy and Legal Advice Centres, common throughout all participating NCs excluding Mozambique. These and other characteristics of the programme and its NCs as well as the consequences for the success of the programme will be discussed in the section Key Findings below.

It should be noted that, while gender is considered central for the grant, as expressed also by the donor, only four chapters (DRC, Guatemala, Jamaica and Nigeria) mention gender in their strategies. However, the majority of chapters said in their focal point questionnaires that it is part of their priorities. Only Colombia and Trinidad and Tobago admitted that gender was not a specific priority, even if they were aware of the topic’s importance. Peru and Venezuela acknowledged that only recently the issue has become more visible in their organisations. Mozambique has a separate gender strategy, since 2013. This suggests that there is some awareness, not least because of the grant. However, more needs to be done to make it an institutional priority for all chapters.

\(^5\) Although Peru has not engaged in any activities in research on corruption in the private sector -- what it had planned to do in its grant agreement with TI-S -- according to information provided through the IMPACT focal point questionnaire answered as part of this review.
Key Findings including strengths and weaknesses

This section maps the key findings identified by the review against the five evaluation criteria: relevance, impact, effectiveness, efficiency and sustainability. The section draws on data collected through the interviews and the desk-based review. The gender dimension will be analysed in each sub-section.

Relevance

Drawing on TI’s 2020 strategy, TI-S Implementation Plan and the NC’s strategies, this sub-section discusses issues of coherence and the degree to which the grant reinforces the priorities of NCs’ and TI-S’ work. Additionally, it assesses the extent to which the activities and outputs funded by the grant are consistent with the expected outcomes in the logic model.

Grant alignment to participating National Chapters’ and TI’s strategic priorities

After analysing TI’s 2020 Strategy and the National chapter’s strategies, we find that the programme is responding to the priorities of both TI at the secretariat level and participating chapters. Beyond this analysis, the general perception among IMPACT chapters is that the areas of work covered are in line with their interests and strategic priorities. The responses provided indicate that alignment is not only to strategic work areas but, for many chapters, integral to the chapters’ pursuit of financial stability.

It is difficult to disagree with this view; when one lists the main characteristics of the programme – which are also part of the grant’s strengths --, we observe that it is likely to be relevant for most organisations working in fighting corruption:

- **Flexibility**: IMPACT was conceived with a degree of flexibility that allows participating NCs to choose the activities to implement among a list of 12 broad outputs that can take numerous forms in practice.
- **Breadth of scope**: The outcome areas are worded in such a broad way that most activities conducted by organisations active in the area of fighting corruption would find the programme relevant and aligned to their priorities. For example, ‘Increased transparency, accountability and integrity at all levels and across all sectors of society’ is the programme’s ultimate outcome (1000).
- **Geographical coverage**: IMPACT has enabled some NCs to access funding traditionally outside of their reach. Given their country income status (see Table 5 below), traditional donors such as bilateral development agencies have significantly reduced or closed operations in these locations. Considering the levels of inequality experienced, the vulnerability in public governance and the obstacles these pose for NGOs sustainable financing basis in these countries, the possibility of receiving consistent long-term financial support improves their capacity to operate. IMPACT has made recruitment of more qualified staff possible and has enable the performance of more costly activities (such as commission of research and case litigation).

<table>
<thead>
<tr>
<th>Income status</th>
<th>Country</th>
</tr>
</thead>
<tbody>
<tr>
<td>High income</td>
<td>Argentina, Trinidad and Tobago</td>
</tr>
<tr>
<td>Upper middle income</td>
<td>Colombia, Guatemala, Jamaica, Peru, Venezuela</td>
</tr>
<tr>
<td>Lower middle income</td>
<td>Honduras, Ghana, Nigeria</td>
</tr>
<tr>
<td>Low income</td>
<td>Mozambique, Congo DRC</td>
</tr>
</tbody>
</table>

Table 5: Income status of IMPACT grant associated countries
Grant’s relevance to address corruption in participating countries

Two elements of this grant are key to providing a positive response on whether the programme is relevant to address corruption in participating countries. The first is the fact that the grant reaches out to all stakeholders who need to be targeted in any anti-corruption effort: outcome 1100 reaches out to ordinary citizens and civil society, and particularly pushes for engagement with vulnerable groups – a segment of society traditionally absent from the mainstream anti-corruption policy community. Outcome 1200 focuses on public sector and outcome 1300 focuses on private sector. The other element of the grant is that it provides the possibility of supporting individuals or organisations that come forward with information about corruption (through ALACs). This would help countries address issues of impunity, associated with unsuccessful anti-corruption efforts worldwide.

The opinion of the reviewers, after conducting the field work and analysing the responses provided by NCs, is that these two elements are possibilities provided by the grant. They may not be taken up by the chapters in its entirety, due to the flexibility of the programme. It is the case, for example, that most chapters chose not to work with the private sector using IMPACT funds, one chapter does not plan to have an ALAC and most chapters are not strategic in reaching out to at least one particular vulnerable group (women). This is followed by another caveat: addressing corruption requires a collective effort beyond what one non-governmental organization can achieve by itself in any country, regardless of its financial or technical capacity. A positive point to relevance is that this grant finances activities in chapters that have significant experience and know how on anti-corruption work. Therefore, their appreciation of what may lead to better results in fighting corruption – and the fact they have expressed this knowledge through their choice of outcomes and outputs – indicates the grant is relevant to anti-corruption work. Moreover, to the degree that this grant enables work that would otherwise not have taken place (or would have taken place in a much-reduced manner), the grant is indeed relevant to address corruption in participating countries.

Appropriateness of initial objectives

Interviewees at TI-S and NCs indicate that the programme initial objectives were appropriate but they also point to problems that may provide some nuance to that perception:

- Political context: given the length of the programme (and the gap between programme design in 2014 and implementation from 2016), some countries experienced political changes that made them restructure certain outputs. It is the case of the Colombian chapter, whose planned activities in the private sector had to be restructured following the signature of a peace agreement ending the country’s armed conflict and physical threats received when staff was operating in certain regions of the country.

- Partners and beneficiaries: some chapters mentioned having to delay or reorganise activities because of obstacles with partners or beneficiaries. This was the case, for example, of Trinidad and Tobago. The first has an activity focusing on awareness raising with the public sector delayed for more than a year due to the ‘silence’ of a major partner (the Parliament).

The discrepancy that exist between the problems encountered in implementation and chapters’ opinion on the appropriateness of initial objectives may be linked to poor risk assessment at the start of the programme. It may also be an incapacity to mitigate risks that materialised. In the risk assessments of
the chapters mentioned in the contracts signed with TI-S for this grant, Colombia had not mentioned any potential problems linked to the conflict or the negotiations of the Peace agreement (which were already ongoing in 2014). It felt a significant impact in that regard, forcing activities to move from one region to another. Trinidad and Tobago had a non-specific risk related to non-commitment, to be followed up after training that was assessed as unlikely to happen, and Nigeria considered the risk that women and government would not engage as unlikely. Peru assessed as very unlikely the possibility of not finding a small group of committed individuals in the towns elected to receive anti-corruption brigades and, as the mitigating measure, would re-direct the activity to another town. 6

This finding needs to be considered from two perspectives: the first is that a long-term multi-country programme like IMPACT is bound to be designed and implemented under significant uncertainty. Such feature will force stakeholders to reconsider activities and approaches during implementation. This may not, however, have a complete negative impact considering the flexibility built into this grant, which allows for readjustments. The second perspective is that chapters may still need close guidance in the planning stages of their proposals. Chapters are best placed to understand the context in which they operate, but their personnel may not be trained in risk assessment or on evaluating the level of ambition they may be able to deliver on.

**Consistency of grant’s activities and outputs with the programme’s outcomes**

The programme’s theory of change states that it:

> “... seeks to establish increased integrity, transparency and accountability among state and non-state actors, while empowering civil society to advocate for change in policy and practise, based on knowledge and evidence generated through this project. The initiative will contribute to sustainable economic growth by working with business to improve their practices and by working with public bodies to develop and enforce better anti-corruption legislation and practises. It will furthermore work directly with individuals and communities to empower them to address corruption and demand change. The project will, particularly in the Americas, contribute to improved security in the target countries, by pushing for increased adoption and exercise of accountability standards and laws by government and targeted national and local security and justice sectors and institutions. Finally, the project will, particularly in Africa, use existing and new evidence to push for increased access to basic services.” (TI-S Project Information Summary)

From this statement, four main results can be expected from the programme (underlined above):

1. Contribution to sustainable economic growth
2. Empowerment of individuals and communities to address corruption and demand change
3. Contribution to improved security in targeted countries in LAC
4. Push for increased access to basic services in Africa

Of these, only three are explicitly addressed by the programme’s immediate and intermediate outcomes: the contribution to sustainable economic growth does not appear in the logic model. It can,

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6 Risks were assessed, per NC, in the contract each signed with TI-S at the start of the grant. An aggregate risk assessment has also been prepared by TI-S for the grant as a whole (the document titled ‘Program and Initiative Risk Register Date assessed: July 2016’). This was built analysing the risks as assessed by chapters and through discussions with regional advisors, who at TI-S are the individuals with most knowledge about the local situation of chapters and the potential risks at that level that can disturb implementation and achievement of results.
however, be implied that empowered people (outcome 1100), improved anti-corruption policy (outcome 1200) and a business sector more committed to transparency and integrity (outcome 1300) would likely contribute to sustainable growth. This assumption is based on the understanding that corruption negatively affects economic growth.

If priority of funding is used as an indicator of consistency between outputs and outcomes, then outcome 1100 is the one where more consistency exists (54 per cent of the funding goes for 1100, 36 per cent for 1200 and 9.7 per cent for 1300). Following the activities implemented by NCs according to their responses to the focal point questionnaire, this consistency is confirmed: outcome 1100 is where more efforts is happening building, in most cases, on previous experience. Hence the increased contribution to change.

A caveat should be added. Intermediate outcomes can be too ambitious for many of the individual chapters to claim having achieved change even at their domestic level. Many outcomes involve more than one target group (for example, different vulnerable groups) that may have different needs in order for results to be achieved. For example, for intermediate outcome 1100, where the majority of chapters have put most of their effort, there seems to be a problem with raising expectations that chapters cannot fulfil: all ALACs are able to provide advice and pursue a response to complaints filed with public authorities or the private sector (Peru, where the chapter reorganised its ALAC not as a provider of direct service to citizens but as a body that follows up targeted grand corruption cases, is an exception). However, not all chapters envisaged their ALACs would represent corruption victims/witnesses in court when that is needed and no other means of obtaining redress exist.

Another example, in outcome 1200, is that of conducting advocacy towards regional bodies for increased commitment in Latin America and Africa towards integrity, accountability and transparency on security and gender issues. It builds on what chapters do at domestic level with IMPACT funds in these areas but also on other activities paid for by different grants. The activities reported by year 2 are mostly at output level, but suggest the work may contribute to the specific outcome.

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7 This may take different forms. More money may be invested, overall, in outcome 1100. In the case of chapters that are investing more funds in another outcome, as the case of Ghana, the NC states that regardless of financial resources, 1100 is the outcome that requires more hours of work.

8 In this regard, it should be noted that outcome 1100 is worded in a way that indicates that empowered groups demonstrate that corruption can be challenged. The IMPACT programme understands redress may be obtained through: the pursuit of complaints via the courts or in communication with public and private authorities when recourse to the courts is not needed and through the capacitation of other NGOs or groups of citizens to engage in, for example, social audits. Argentina’s chapter, for example, is pursuing litigation in court, while the chapters in Ghana and Trinidad and Tobago focus on forwarding complaints to relevant bodies and pursuing communication with them to obtain redress to victims. On the social accountability side, chapters in Peru and Guatemala have worked on this method of empowering citizens since 2015 and 2016, respectively. Ghana’s chapter social accountability clubs are expected to start operating within the remaining time of this grant. However, if no redress is achieved through any of these means by the end of the four years of this grant, it is reasonable to say that this objective is only partially completed (developing the channels that allow victims to complain and seek redress is one component of the final outcome).

9 For example, regional advisors in the LAC region have supported chapters to agree to include gender, among other topics, as a regional work priority. One example of how this is happening in practice include a submission of a recommendation on gender and corruption to the Regional Summit of the Open Government Initiative. At the domestic level, regional advisors have also supported implementation of activities, but the level of support differs
However, it should be noted that the monitoring documents provided up to year 2 indicate a large number of advocacy materials (recommendations and concept notes) have been submitted to regional bodies. These are outputs under the control of TI-S and NCs, so they are easier to monitor. Achieving outcomes may take longer than the two years covered by this review and may be the result of more actors engaging on the issues. This means that, when monitoring the grant progress in this outcome, attention should be had so that data collection is able to capture evidence that these advocacy efforts are resulting in policy or legislative change – possibly as contribution together with the work of other actors.

**Impact**

Analysing the monitoring practices in place at TI-S and NCs involved with this grant, and outcome indicators contained in the logic model, this sub-section assesses the degree to which these outcomes are being achieved. In addition, it assesses any unintended outcomes, and the degree to which the IMPACT programme and NCs have a theory of change for this grant to which all (intended and unintended) outcomes and change feed into, as well as how any outcomes can be mapped against the TI Impact Matrix.

**Key outcomes/impact achieved in the three result areas**

Of the three outcome areas (1100, 1200 and 1300) of the grant, both responses from interviewees and the secondary data available indicate that most results are being achieved in the people empowerment (1100) outcome area. Some results have been achieved with the work with public institutions (1200), however the outcomes expected in this area may take longer to appear, and are not solely dependent on each chapter’s efforts. Business integrity activities are being pursued by half of the chapters and also receive a lower percentage of funds – hence, have fewer results to show. Nevertheless, even in countries where activities are being pursued, results are below program expectations and have not started producing visible impact.

**Key outcomes on empowered people (outcome 1100)**

Of all the result areas, this is the one with the most planned outcomes, outputs and activities. The overall goal is to: *Empower people, groups and communities demonstrating that corruption can be challenged effectively.* This is to be achieved through increased support to victims and witnesses of corruption, through ALAC related activities; increased public awareness of how to fight corruption, through outreach activities and monitored through increase in civic actions and social audits. Finally, increased knowledge about citizen’s experiences related to corruption, through studies and research. In all activities, it is expected that women and other vulnerable groups are considered.

Through a combination of the outreach efforts and reinforcement of ALAC capabilities, NCs combined have been able to surpass by more than double the target number of cases they expected to receive in 10 ALACs (for reasons already mentioned Peru and Mozambique are outside of this list). The grant has also allowed to reach more people than anticipated through outreach efforts, by more than 6-fold. While these are impressive achievements, some chapters are finding hard to cope with the increase in between regional advisors for the two regions due to the needs of chapters and the clarity of instructions received by advisors.
demand. In fact, while 20 staff were expected to be hired to help with the increase of cases among these chapters, only 9 had been hired by year two. Concerns about ability to keep staff is the principal reason preventing new hires, both for ALACs or other positions. In terms of gender specific results, registering the sex of complainants is generalised and showing data disaggregated by gender have become more systematic. The available data also suggests that women's access to ALAC services and participating in outreach activities is balanced.

Results on redress and resolution of cases are not so impressive as outreach and the support mechanisms (not many NCs have the capacity to go beyond providing legal advice to victims or effectively obtaining redress). This is likely because justice systems are notoriously slow, and in some contexts even hostile. Civic actions reportedly have also been proportionally fewer than cases of communities challenging corruption through social audits. Community based actions such as social audits, which are inspired by awareness campaigns and trainings, are responsible for these results. However, it is not clear from the results whether the communities are yet fully able to replicate the knowledge they have acquired, without assistance from the chapters. The most advanced experiences are in Peru and Guatemala. In Peru, Social Audits exist since 2015 (i.e. prior to the grant) and have the support of the government’s Ombudsman, which trains anti-corruption youth brigades. In Guatemala, the social audits are conducted by private citizens, without institutional support from public bodies such as in Peru. In both cases, the chapters still need to compile the results collected into reports. This means that, though citizens seem to be able to be recruited for conducting social audits, they are still dependent on the chapters for producing the outputs of their actions.

There are fewer actions carried out in terms of knowledge production, since results for this outcome are expected towards the end of the grant. Some of the actions, like the Global Corruption Barometer, are the responsibility of TI-S and not the chapters. However, they are considered an advocacy tool and measurement of the 1200 outcome. In addition, the civic actions that have been carried out are linked to the information generated through ALAC cases, a good source of information for further activities. However, it is unclear if the information is used consistently across all chapters to further promote or inform chapter's work. When chapters explain a conscious decision about not using such information further, they cite concern with protecting the whistle-blowers' identity.

Using TI's Impact Matrix (see Table 6 below), it is possible to assert that the IMPACT grant has been essential to change through outreach in most of the NCs. At the very least, with the exception of Mozambique which is not conducting outreach through the IMPACT grant, contribution to change has been important. All chapters are equally vested in awareness raising activities. Anti-corruption activism and community action has given an important contribution towards behaviour change. The least impactful chapters in community actions were Mozambique and Nigeria. The former is

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10 The other chapter experimenting with social audit clubs is Ghana. However, they are still at the inception of the experiment. They have established social audit clubs and trained anti-corruption champions which are to encourage social audits. The experience is still in the early stages and has not shown consistent results.

11 There are some limitations in using the GCB as a measurement tool, as it is difficult to measure its direct contribution to a general decrease in corruption (other than victimization of individuals). This is because a number of factors can contribute positively or negatively to decrease in corruption at national level, that are beyond any single anti-corruption initiative’s control. However, this tool is better than other tools such as the CPI, which are based on perceptions, rather than actual experiences.
not conducting outreach, and the latter is reportedly conducting outreach on more formal settings and not directly with communities. The most significant impact in redress has been achieved by Peru and Argentina. Peru has been prominent in the 'Lava Jato' case, which has had visible impacts in the political arena. Argentina has been successful in becoming a third-party civil complainant in one grand corruption case in the country, opening a precedent to enable other civil society organisations to litigate corruption cases. Other chapters have reported some measure of success in redress, although some time is still needed for the resolution of most cases. The least successful chapter in redress has been Trinidad and Tobago, as they have yet to succeed in obtaining full redress for one case. However, as noted before redress has been understood and approached differently by the different chapters, depending on their capabilities (see footnote 8). In addition, almost half of the chapters (Colombia, Venezuela, Mozambique and Nigeria) are not engaging in redress activities. Jamaica is engaging in redress activities under funding from other agencies, and as such is not reporting on this for the IMPACT grant.

**Key outcomes on public institutions integrity (outcome 1200)**

This area comes second in terms of results. The overall goal is: *Improved and gender sensitive anti-corruption policy and practice by local, national and regional public institution, including on security.* This is to be achieved through increased commitment to anti-corruption policy and practice of national and public institutions; as well as increased commitment to integrity and transparency by regional actors. The outcome is expected to be gender sensitive and take gender equality into consideration.

As with the previous outcome area, overall NCs were able to largely surpass the expected activities related to submission of policy recommendations, awareness raising, and engaging with meaningful actors locally, nationally and regionally, with the support of the TI-S regional advisors. Though it can be expected that recommendations and training may produce some results in the future, this cannot be proved, unless proper monitoring of change is conducted. Presently, chapters and TI-S teams have privileged the monitoring of outputs carried out directly by them. It would be important to also monitor the actions of targeted institution, following recommendations presented at national and regional level, even if they are the result of collective effort, and are out of TI's control.

Moreover, though the outcomes aim at gender sensitive policy contributions, only a minority of the cases reported specify concerns regarding gender issues. These include change in policy and practice in access to land by women, in Ghana; gender equality in national strategic planning, political participation and legislation regarding gender-based violence, in Argentina, Guatemala and Jamaica.

In terms of political and institutional change, the IMPACT grant has had important contributions in suggesting improvement of processes (see Table 6 below). In Honduras the contribution has been significant. Among other activities like training of social audit groups and public prosecutors in litigation techniques, they have also started assessing complaint mechanisms with nine public institutions. Half of the chapters had important contributions to change in institutional processes. For example, in Argentina, Poder Ciudadano has contributed to process change within at least one municipality, with the uptake of several recommendations. The remaining chapters, however had little or no contribution towards change in institutional processes. Contributions towards policy adoption and amendment, or improvement of enforcement of policies, have been weaker, across the board. It is chapters with MOUs signed with strategic public institutions which have been more successful in contributing to change in terms of processes and policy adoption and implementation.
It should be noted that our analysis is based on a subjective assessment of scoring criteria provided by the Impact Matrix. Activities regarding outreach, activism, advocacy, and awareness raising are more easily measurable. They are also more easily relatable to behaviour change, even if ultimately, they may lead to institutional change. However, as mentioned before, aside from advocacy, chapters have less control and influence over political and institutional change, as political actors yield considerably more power than individuals and communities, hence our finding of weaker contribution to change.

Moreover, as the IMPACT grant funds mostly activities that the NCs were already implementing, the results may be blended with results from activities financed by other grants. As such, it becomes difficult to isolate the results attained only due to IMPACT funds. The result is that activities funded under other grants, which may yield positive and visible results, are not reported under this grant. For example, Jamaica does not report redress activities under the IMPACT grant, while it carries those activities under other grants. It has also had success in advocacy efforts to get legislation drafted and passed, again under other grants.
The scoring below is a subjective assessment based on a reading of the National Chapters reports, as well as the grant’s annual reports.

**Table 6: Analysis of impact following TI Impact Matrix**

<table>
<thead>
<tr>
<th>COUNTRIES</th>
<th>POLICY AND INSTITUTIONAL CHANGE</th>
<th>BEHAVIOUR CHANGE</th>
<th>OUTREACH AND AWARENESS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Improved enforcement policies</td>
<td>Anti-corruption activism</td>
<td>Seeking redress against corruption</td>
</tr>
<tr>
<td>Argentina</td>
<td>1</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Colombia</td>
<td>0</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td>Guatemala</td>
<td>2</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>Honduras</td>
<td>2</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Jamaica</td>
<td>1</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Peru</td>
<td>0</td>
<td>0</td>
<td>2</td>
</tr>
<tr>
<td>Trinidad &amp; Tobago</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Venezuela</td>
<td>0</td>
<td>0</td>
<td>1</td>
</tr>
<tr>
<td>Democratic Republic of Congo</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Ghana</td>
<td>1</td>
<td>2</td>
<td>3</td>
</tr>
<tr>
<td>Mozambique</td>
<td>0</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Nigeria</td>
<td>1</td>
<td>2</td>
<td>2</td>
</tr>
</tbody>
</table>

* 3) Significant contribution: Our contribution to the change was essential. It is clear that the change would not have happened or would not have happened in the same way without our involvement; **2) Medium contribution:** Our contribution to the change was important. The change would probably have happened without our involvement, but it might not have had the same quality; **1) Little contribution:** Our contribution made only a little difference. The change would most likely have happened without our involvement and would have had a similar quality, but our involvement is likely to have nudged the change slightly in a specific direction; **0) No contribution:** Our contribution to the change was insignificant or non-existent.

Key outcomes on business integrity (outcome 1300)

In this outcome area, half of the chapters (Colombia, Honduras, Mozambique, Nigeria, Peru and Trinidad & Tobago) have activities declared in their contract signed with TI-S. The overall goal of this area is: *Increased commitment to transparency, accountability and integrity in business practice*. This is to be achieved through increased knowledge and business transparency; as well as increase knowledge of integrity, transparency and accountability by businesses.

Overall, results are weak. There is no data reporting on activities carried out by Mozambique and Nigeria. On the other hand, results from the remaining countries focus on training, assessments and integrity pacts. Moreover, the results from these activities are considerably below the expected targets by year 2. There were supposed to be two Business Integrity Country Agenda (BICA) assessments, followed by advocacy activities. So far only one BICA was conducted (in Trinidad and Tobago) and advocacy activities are yet to initiate.

One of the biggest challenges mentioned by the chapters is the reluctance of businesses in engaging in discussions about corruption. It is unlikely that activities from this outcome area will be able to produce significant impact within the grant’s time, even if more effort is put into it. The best potential for this outcome area would be to create the relevant expertise for NCs that could be used towards generating income (for example, by selling training on international best practices to businesses). This aspect of this outcome relates to financial sustainability and should be discussed outside of the frame of this grant as it relates to the business model of the chapters. This will be further discussed in the recommendations.

Unintended outcomes

Overall, outcome indicators associated to the result areas read as outputs that do not immediately translate into measurable outcomes. This is particularly true for the intermediate outcomes expected to lead to the ultimate goal. At the same time the expected results are described so broadly that they can account for a large variety of results. This is necessary, if we consider the variety of chapters. This also means, however, that it becomes difficult to identify unintended outcomes of this grant. There is no clear visualisation of results and progress, and hence of potentially unexpected (positive or negative) results. Changes in activities can best be understood as contingency actions, rather than unintended outcomes. For example, security threats experienced by chapter staff and whistle-blowers can be considered anticipated risk. The closest to an unintended outcome that we can mention is the ALACs becoming a recognized institutional venue for complaints, on and beyond corruption cases. ALACs have done their best to refer complaints to the appropriate public or private sector entities and follow up to pressure for a response to victims. However, given the slow pace of responses from such institutions (when they respond at all), ALACs may need to undertake the responsibility of representing victims in civil or criminal courts. In doing so, ALACs are positioning themselves as a provider of critical support for vulnerable (or not) populations with few avenues for complaint and redress.

Theory of change

As mentioned above (see page 24), four main results are expected from the program based on its theory of change. This theory of change is the result of discussions between TI-S and the donor and resulted in a Performance Measurement Framework (PMF) that spoke to it. The main assumption is that by working with businesses and public institutions to change norms and policies, as empowering people to demand
change, the ultimate goal of sustainable economic change could be achieved. However, the logic model shows a different ultimate goal, which is: Increased transparency, accountability and integrity at all levels and across all sectors of society. It is easier to establish a relationship between the activities planned and carried out under the IMPACT grant and the latter goal, than the one mentioned in the theory of change, of contributing to sustainable economic growth. This goal is notoriously difficult to measure, and contributions by any given actor, however competent in programme delivery are at best marginal. While at the same time, actions that contribute to improved legislation and practices can, in theory be claimed to contribute to economic growth. Sustainability of this growth, however can only be measured in timeframes beyond the grant.

Overall, chapters are not following this theory of change evenly. They are rather putting efforts on activities as they have more experience, are a continuation from previous activities, or are contextually likely to produce more results. The data suggest that chapters are trying to achieve certain targets, but there is no evidence that those targets relate to the specific theory of change, but rather that they will contribute to the overall outcome. If chapters do not achieve their own expected outcomes, even if their outputs contribute positively to the consolidated targets of the grant, it will not be possible to affirm with certainty that the assumptions considered in the theory of change will have been realized.

It is the assessment of the reviewers that only one output (Empowerment of individuals and communities to address corruption and demand change) is likely to be achieved within the timeframe of the grant. Some measure of results on improved security in LAC countries and access to basic services in African countries will also be achieved. However, both issues are complex and beyond the capability of meaningful contribution of any single program. As for the ultimate goal of the grant’s theory of change, it is our understanding that the assumption is that improvements of the Corruption Perception Index and Global Corruption Barometer results should be understood as a means to increased “sustainable economic growth”. However, measurement tools like CPI have several limitations and they should not be used to show progress on the grant, as it is impossible to ascertain that movements of a country in the index are due solely from actions on the ground.

Value added by the grant to the outcomes/ impact achieved
According to the NCs, the most noticeable added value of the grant is related to the ALAC and outreach work. Several chapters were able to increase the support to complainants, through increased outreach, but also hiring new staff. Finally, three new ALACs were activated, in Colombia, Nigeria and DRC. Of the 12 chapters, Peru has a legal office that focuses on select, high profile cases; Jamaica is scheduled to receive support for the ALAC only in year 4; and Mozambique does not have an ALAC.

In terms of outreach work, most chapters where in agreement that the IMPACT grant allowed them to expand into new geographic areas and reach a wider public. A few chapters, like Trinidad and Tobago were able to start working in new areas, like public sector integrity. DRC also mentioned the novelty of empowering citizens to collaborate in fighting corruption.

Some chapters, like Argentina and Ghana appreciate the visibility the grant has given them, nationally and internationally. This visibility has been crucial for the ability of gaining allies, particularly in the public sector. On the other hand, the stability and long duration of the grant has allowed to properly structure the strategic actions of activism and follow through with planned activities. This was particularly important for chapters in medium and high-income countries, where funding sources are scarce.
Similar grants being implemented in IMPACT grant beneficiary chapters

The IMPACT programme is one of TI’s movement largest grant, but it sits among some other programmes financed by significant funding envelopes and involving some chapters part of the IMPACT programme:

- **MINING programme**: funded by a grant of EURO 6 million, from BHP Billiton Foundation and the Department of Foreign Affairs and Trade in Australia. It reached 20 chapters in its first phase (5 part of IMPACT grant: Colombia, Guatemala, Congo DRC, Peru and Mozambique) in an effort to conduct research to understand corruption vulnerabilities around licensing in the mining industry. It is in its second phase now (from 2016 to 2021), dedicated to advocacy. None of the IMPACT chapters are part of Phase 2.

- **CRIMJUST**: receives funding from the EU Cocaine Route Programme, implemented by UNODC, Interpol and TI. CRIMJUST funds research to understand corruption vulnerabilities in the justice and security sector followed by advocacy work in this area. In Guatemala, Honduras, Peru, Colombia, Nigeria and Venezuela, CRIMJUST activities are an output of the IMPACT programme. Participation of Ghana is paid for directly via UNODC and these activities are not accounted for under IMPACT.

- **ACTION programme**: funded by the EU Commission, aims to spearhead the implementation of all Sustainable Development Goals considering the anti-corruption angle. It is available to any TI chapter (chapters compete for small grants) and is implemented over the same 4-year period, with a budget of EURO 6.7 million.

There are several positive elements arising from chapters implementing more than one grant coming from TI-S. For example, chapters may collect data and produce evidence with funds from one grant and use this knowledge for advocacy financed by another grant. It is the case in Peru where research conducted on mining issues is feeding into a new partnership to work on corruption in the Amazon region, which happens under the IMPACT programme. Chapters also benefit when resources of different programmes allow chapters to benefit from TI-S services or events. This is happening for example involving the ACTION and IMPACT programmes and is discussed in the lessons learned section.

However, these benefits seem to be happening on an ad-hoc reactive basis. While it is clear that it is impossible to anticipate all synergies that may exist among projects at the design phase (given that they are prepared in different moments, have different donor requirements regarding co-funding and other practices that may prevent integration), there are two possibilities of improving the way programmes relate to each other. One is the model of CRIMJUST. CRIMJUST is included into the IMPACT programme as an output, so the relationship can be more relevant and the opportunities to build on each other are more evident. The other possibility is to involve more than one programme manager in the process of working on annual plans for grants that involve the same countries and cover a longer-term period. This can increase the potential to involve more chapters in more programmes.

There is, however, only one negative aspect of having more than one TI-S grant funding activities in the same country: it increases the financial dependency of that chapter on TI. More detail in the section Sustainability.
Effectiveness
This sub-section assesses the degree to which outputs and activities planned were achieved at NC and TIS levels in relation to the targets set in the original project proposal and in the plans and grant agreements signed between NCs and TIS. In addition, this sub-section assesses how realistic the initial outcome indicators were, how have TIS or NCs deviated from them, and how likely are both to achieve the agreed outcomes.

Likelihood of achieving outcomes
It is a challenge to identify baselines and targets to indicate progress per NC in the documentation related to the grant. The five documents below, provided by TIS, all show targets in different formats and wording. It becomes unviable to draw objective comparison or show meaningful and comparable progress across them all:

Per chapter

1. **Contracts signed between TIS and NCs**: do not present baselines against which progress could be measured. Targets are also presented differently. Colombia’s contract does not have targets, although this missing data was provided later in the programme. The remaining countries have provided them in some form, however the wording is very different among chapters: some do not provide measurable targets such as Nigeria, others state that targets for some outputs will be defined afterwards such as Peru.

2. **Annual reports for Y1 and Y2**: the compilation of reporting submitted by chapters and prepared by TIS annually shows targets per NCs. Lack of uniformity persists (for example, in this case Colombia presented targets in annual report -- while it did not present them in the contract agreement with TIS. In the case of Venezuela, while the contract presents targets, the annual reports do not).

3. **Spreadsheet ‘PMF database LO Y2output’**: it shows progress per country (per outcome immediate, intermediate and outputs) for Y1 and Y2. It also provides one target per outcome immediate and intermediate and outputs. It is not clear, though, whether the target is for the whole programme or for a chapter in specific. It can be implied these are for the programme as a whole since there is only one target per outcome/output. But wording may suggest the target is linked to one particular country. For example, ‘4 advocacy (Nigeria) workshops on defence by November 2019’.

Aggregate at programme level

4. **CIDA’s Performance Measurement Framework**: the document of 27/09/2017 presents some measurable targets for the programme as a whole (per outcome immediate and intermediate and per output). This was taken from annual plans submitted by NCs individually. The document indicates when chapters and also TIS are responsible for contributing to each target.

5. **Results matrices combined Y1+Y2**: this document shows progress against programme targets for the whole programme per output and per outcome. Currently, it presents data for years 1 and 2, and it is expected that the matrix will be updated until year 4. Its content, however, suffers from the same problems of inconsistency that is found in monitoring data at chapter level. For example, for some outputs, results for Y1 and Y2 are available. For other areas, such as outcome
1300, only one output (1321) shows results. In other cases, the target is still to be defined even at the second year of implementation.

There is a large amount of data collected but, as shown, it is compiled in a non-uniform manner and the quality of targets as proposed by NCs varies. This means that some results may end up not being captured and some problematic areas may end up unaddressed as they are not spotted. At the end of the day, monitoring is not an end in itself, but it is a means to assess whether chapters achieve results at their domestic level. But this non-uniformity means that it is a challenge to provide something other than an overall impression about how each chapter is progressing individually.

The assessment of the reviewers (based on detailed analysis of targets NCs state having achieved in the annual report Y2) is that:

- **Chapters in Argentina, Trinidad and Tobago and Colombia** are reporting more activities undertaken than they have committed to in the contract. It is difficult to state whether these are meaningful outputs or a ‘means to an end’ activity because of the lack of homogeneity in reporting.
- **Chapters in Guatemala and Peru** seem to have substituted one output for another. These were reported as having been undertaken as a result from legitimate difficulties. For example, both chapters state clearly in the annual report Y2 having no activity under output 1123 – which is a failing output for the entire programme. In exchange, the two chapters specifically indicate having undertaken other activities not previously in their contract (an ALAC advertisement campaign for Guatemala and the monitoring of news items that mention the chapters’ research for Peru).
- **Chapter in Nigeria** has targets against which it is difficult to show progress given the wording and the fact that they represent ‘means to an end activity’ instead of meaningful expression of progress in terms of outputs. For example, Nigeria states that it has achieved the ‘identification of a suitable location for the ALAC’ and that ‘ALAC is operational and working group is active’, when ‘ALAC successfully set up’ would have sufficed.
- **Chapters in Venezuela and Mozambique** – have either underperformed or are not monitoring results regarding for outputs 1221/1222/1321 (Mozambique) and 1212 (Venezuela).
- **Other chapters (Honduras, Congo DRC, Jamaica and Ghana)** appear to be delivering on the activities established in the contract and express targets achieved in some measurable format in the annual report Y2.

As will be discussed in the recommendation section, TI-S does not have enough IMPACT programme staff to handle such a massive amount of data in such a non-homogeneous manner. It is difficult for two staff only to engage in ‘back and forth’ checks with NCs. Moreover, if there is a change of management staff for the IMPACT programme, it will be challenging for the new person to have a reasonably simple overview of the programme in terms of NCs achievements.

Therefore, one single reporting mechanism should be in place to track progress. A good model is the measurement spreadsheet produced for the workshop organised in Maputo in April 2018. It should include an extra column with ‘progress realized by DATE’ and all the IMPACT chapters. In addition, there should be a critical assessment on whether the targets set by the chapters are measurable, and relevant to the output they are being attached to. Where relevant, TI should assist the chapters in improving
their indicators, as ultimately it will also help the chapter in reporting in a more meaningful and effective way.

**Initial outcomes: realistic?**

As previously mentioned, there were issues with the planning and risk assessment that suggest that some outcomes may have been over optimistic. Based on the discrepancy between identified risks and challenges reported (see table 9), chapters over estimated their capacity to undertake some of the tasks of the assignment. Some of the changes due to context could have been anticipated, for example.

In terms of result areas, outcome 1100 results were underestimated. The performance is way above expected, even as some chapters have not registered increase in their case load. With such as improvement, targets could have been adjusted to transform, for example what was an overall target (reception of 2000 ALAC cases) into a yearly target, which has been a consistent yearly result. Outcome 1200, on the other hand, has shown impressive output results, which are not clear if they will meaningfully affect the expected outcome. 1300 has proven unrealistic overall, either because some chapters which had skills and previous know-how on private sector are underperforming in this outcome area or because, for other chapters, adding this area proved to be too ambitious based on their capacity. Even considering that outcome 1300 received less funding from the start, the results in monitoring documents provided (particularly the Results matrices combined Y1+Y2) shows it will be difficult to meet the programme targets.

**Factors influencing the achievement of outcomes**

The yearly reporting produced by NCs indicates 9 of the 12 chapters have experienced a politically unstable scenario in one or both years of the implementation. This has been cited as the most common challenge impacting their capacity to deliver activities. Difficulties to get partners engaged are cited by 6 chapters and problems such as staff rotation, lack of qualified staff and other personnel issues are mentioned by 5 chapters as are security threats against staff/partners (see table below).

**Table 7: Challenges for implementation in order of the most frequently cited to the least**

<table>
<thead>
<tr>
<th>Challenges at country level</th>
<th>year 1</th>
<th>year 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Political agenda in the country (elections, new government, general political instability, authorities interested in other issues)</td>
<td>Argentina; Colombia; Congo DRC; Ghana; Jamaica; Mozambique</td>
<td>Argentina; Colombia; Congo DRC; Guatemala; Honduras; Peru</td>
</tr>
<tr>
<td>Difficulties to get partners (authorities or others) to engage</td>
<td>Argentina; Congo DRC; Ghana; Peru,</td>
<td>Ghana; Guatemala; Trinidad and Tobago</td>
</tr>
<tr>
<td>Difficulties related to staff (delays to hire, difficult to attract qualified staff due to salaries, staff leaving, too much work for staff)</td>
<td>Colombia; Guatemala; Honduras; Jamaica; Trinidad and Tobago</td>
<td>Trinidad and Tobago</td>
</tr>
<tr>
<td>Security threats to chapter staff or partners</td>
<td>Colombia; Venezuela</td>
<td>Colombia; Mozambique; Nigeria</td>
</tr>
<tr>
<td>Citizens do not come forward with complaints</td>
<td>Congo DRC</td>
<td>Venezuela</td>
</tr>
<tr>
<td>Legal obstacles for redress activities (to engage as civil party in litigation)</td>
<td>Argentina</td>
<td></td>
</tr>
<tr>
<td>Natural related events</td>
<td></td>
<td>Peru</td>
</tr>
</tbody>
</table>

Source: NC’s annual reports for 2016 and 2017
Chapters have indicated that TI-S has been flexible and understanding in their delays of implementation or in submission of data for monitoring and reporting purposes. Non-submission of timely reports to donor is a consequence and a problem, because it may impact the possibility of a new grant in the future. However, it is a smaller problem when the challenges faced by chapters’ in their daily operations are considered. In this regard, the relationship between TI-S and its capacity to support chapters in achieving the outcomes of the grant is an important issue.

**TI-S relationship with and support to chapters to implement the IMPACT grant**

NCs mostly refer to their relationship with TI-S in positive terms. The main benefits chapters perceive they gain by their engagement in the movement are:

- the value of the international reputation of TI to advance their work domestically,
- the knowledge sharing network that allows access to ideas and experiences,
- the possibility of receiving financial support through the network.

However, the issue of inadequate support emerges when we reflect on the challenges experienced by NCs as mentioned in Table 7 above, some chapters’ characteristics, and the institutional reorganisation that TI-S has experienced. Some chapters have said that TI-S has a limited understanding of the reality in which they operate. Other chapters stated that the reporting mechanisms for this grant are too cumbersome. These chapters acknowledge staff good will and willingness to provide support, but they have considered the issue as a problem worth enough to mention.

In order to be correctly addressed, the real meaning of lack of support in the context of IMPACT grant needs to be discussed:

- **Language:** When asked about the strengths and weaknesses of the relationship, some chapters indicate they struggle with a movement that functions in English. Language barriers may seem a lesser problem, but for a multi-country grant, it means obstacles to engage with and learn from other chapters and the secretariat (more on this will be discussed in the section Strengths and Weaknesses below). This is the case for Congo DRC (the only French speaking chapter), Mozambique (the only Portuguese speaking) and some Latin American chapters where the executive director does not speak English (note should be taken also that administrative staff may not be as fluent as content staff).

- **Integration in the movement:** While some chapters have been part of the TI movement since its origin (see Table 3 in Context), others are not yet fully accredited members. The length of time of membership is also no guarantee that their level of integration in the movement is deep and that they know of opportunities provided by the network. When chapters are outside of the main networks in the movement (as it is the case for chapters in the English-speaking Caribbean considering the Spanish speaking network in Latin America), when staff turnover is significant or when language is a barrier, the chapter is likely to be relatively isolated. This may be the case of new members, such as Nigeria and Congo DRC, because of their new involvement in the movement (which means less exposure to the movement and its opportunities, regardless of their institutional capacity). But it also impacts old standing members such as Trinidad and Tobago, which may have less contact with the opportunities provided by the movement because its board members are volunteers, which means among other issues that they sometimes may not be able to attend TI-S events.
• **TI-S reorganisation**: Some chapters do indicate that staff at TI-S seems stretched beyond capacity and that expertise is not available anymore. This will be discussed under Efficiency.

**Strengths and weaknesses of the grant**
Some features of the grant, as discussed in the section relevance, are its mains strengths:

- **Flexibility**: in terms of NCs capacity to include and reinforce existing priorities among the activities funded with IMPACT funds.
- **Breadth of scope**: allows most activities traditionally implemented by anti-corruption organisations to be included.
- **Geographic coverage**: the fact that middle income and upper income countries can benefit from the grant, in a context of reduced access to traditional donors.

To these, reviewers add the **duration of the grant**, which means a longer funding horizon for many chapters (Trinidad and Tobago, for example). The **size of the funding envelope**, for some chapters, is also non-negligible: IMPACT responds for more than 50 per cent of the funding for chapters such as Congo DRC and Trinidad and Tobago and has allowed engaging with activities that cost more (for example, research). The fact that the grant guidelines allow chapters to finance pre-existing activities, which means they can build on previous know-how, strengthen capacities and deliver results building on previous work.

The weaknesses of the grant are:

- **Dependency on funding from TI-S**: NCs would like to be capable of raising their own funds without the help of the Secretariat. This presents a contradiction with the perceived benefit of having access to funding through the network. More on this in the section Lessons learned.
- **Lack of exit strategy for the grant**: the grant funds important work for the movement, such as ALACs, and is longer term than most of the other funding chapters can access. Even if the grant only represents a part of chapters’ income, in several cases it funds ALAC activities in its entirety. Most chapters state they will work hard to find alternative sources of funding to maintain some basic level of ALAC activity. But they are clear that there is a potential risk of having on and off activities, that only function when there is funding from TI-S. The IMPACT grant contains one output (1123) that should help at least diversify the funding sources for chapters. However, this output is not being implemented. It also does not help chapters discuss their model of operation and what types of funding structures would be more realistic in their context. This discussion should be held regardless of this grant. A suggestion will be made in the section Recommendations.

The **mass of information generated** by the grant: the grant is structured as a series of national programmes, given chapters’ freedom. The monitoring effort is commendable as a serious attempt to manage for results. But more does not always mean better. Data collected through reporting is communicated as national reports – narrative, financial, yearly plans and yearly reports. These may be collated together, but there is no effort to show data in a more comparative. For this reason, it becomes

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12 It should be noted that country reports are a request of the donor, which circulates the documents to the respective Canadian embassies in each participating country.
difficult to see how the grant is progressing across countries involved. The freedom chapters have or demands from the donor should not impact negatively the way information on progress is disseminated by TI-S. At least for each region, but preferably for the program as a whole, data could be structured in a more joint manner, even in comparative terms.

Another missed opportunity is the lack of synergy across regions given the fact that the grant is implemented over two continents. Some chapters have used the grant to learn from others (chapters in Ghana and Nigeria visited the Rwanda ALAC and the chapter in Colombia visited the Honduran ALAC). But the sharing of experiences has not happened to the degree that it would have been expected considering the number of countries involved and the two regions work on at least one common issue (the ALACs). Even if cross-regional integration was not initially envisaged, it has shown to be possible and could have been more explored. Some suggestions are made in this regard in the recommendations.

Efficiency
This sub-section assesses the use of staff and resources and the extent to which this grant provides value for money, looking at TI-S’ and NCs’ budgets, staffing and any other relevant resources such as the use of partners. Additionally, it assesses the level and adequacy of TI-S support to NCs, how it evolved over time, as well as how NCs partners are involved in the implementation of the IMPACT grant. Finally, it assesses if risks were well identified and how they are currently managed.

National Chapter – TI-S partnership and management arrangements
The IMPACT grant was drafted in 2014, during the discussions of a new movement strategy. The Secretariat was also close to enter into a period of reorganisation. This has important implications for the management of the grant at TI-S and to TI-S relationship with NCs.

In 2016, when the IMPACT grant was signed, TI board decided that a less hierarchical organisation should be put in place and TI-S entered into a management period referred to by staff as ‘holacracy’. A reversal of the ‘holacracy’ model back to a more hierarchical structure started in late 2017. A new managing director was hired in October 2017. The IMPACT programme that had been located in a team called ‘Programmes’ in 2016 moved to the ‘Strategy and Impact team’.

Staff in TI-S acknowledge that the reorganisation and redundancies led to the loss of expertise and reduction in staff numbers. This resulted in some individuals becoming responsible for more than one job. Remaining staff also indicate there is lack of clarity for their new teams and positions and a perception of forced separation of activities (particularly for cross regional programmes like IMPACT that have domestic, regional and global activities).

13 For example, the training on security issues offered in 2017 in Mozambique through TI-S SAFE coordinator has brought together countries from both regions. It used the opportunity provided by the security concerns experienced by the Mozambican chapter to teach chapters in Africa and in LAC how to improve their security procedures and protocols.
Figure 1: TI-S structure in August 2018

Source: TI-S website in September 2018 (https://www.transparency.org/whoweare/organisation/secretariat/0)

An overview of TI-S staff involved with the IMPACT programme to different degrees in August 2018, show:

- two staff managing the IMPACT programme: only one is fully dedicated while the other manages a parallel project (CRIMJUST). These two staff members support chapters on their daily requests regarding IMPACT, including monitoring spending levels, discussing annual plans and following up reporting. If chapters need help with substantive issues, these two members of staff may either provide advice themselves or help link the chapter with someone else available at TI-S. Given the structure pre-2016, most chapters still contact their regional advisor for most issues;
- regional advisors: two for Latin America and Caribbean and three for Africa (responsible for East Africa, West and Central Africa and the Southern part of the continent). Regional advisors are responsible for the implementation of IMPACT regional activities (outputs 1221 and 1222). In the specific context of this grant, they also support organising learning exchange activities and providing strategic advice regarding risk management and capacities needed by chapters to implement the grant. In practice, however, all chapters have their regional advisors as their formal point of contact in TI-S. This is due to their role in accreditation of chapters. But more importantly because regional advisors are the location of the most in-depth knowledge of the chapters in TI-S. This is important for the implementation of any grant, as they may help spot problematic areas at programme design or at implementation phase and can provide crucial support to improve the impact of activities;
- other TI-S staff have their salaries partially covered by the grant and, therefore, engage with the chapters in some degree. For example, the person managing the implementation of the Global
Corruption Barometer production (whose data collection is being funded by IMPACT in Latin America), the person conducting a review of experiences with social auditing within the TI movement and the staff responsible for the SAFE programme (a support position that helps chapters develop security protocols and practices). The activities conducted by these TI-S staff are conducting informing regional advisors as the results (for example, the GCB) is advocacy material for regional work.

Given that only two staff engage more closely with the grant and the fact that IMPACT covers large areas of the world and includes chapters with different structures and levels of integration in the TI movement, it cannot be reasonably expected that these staff develop in depth knowledge of each chapter receiving the grant. This makes it difficult for TI-S to provide tailored and regular support beyond monitoring spending levels, discussing annual plans and following up reporting. This a situation that impacts negatively on the management arrangements.

Chapters need support with tasks beyond bureaucratic administration of the grant. Underspending, which has been a problem noted by TI-S accounting staff\(^\text{14}\), indicate that there are problems of programme design and that chapters need support in the planning stages to assess their real capability of implementation. Chapters also need support with substantive expertise for execution of activities, whether this means developing a research methodology or establishing relationships with an unfamiliar stakeholder. One example, from Guatemala, shows how a closer relationship to chapters leads to better results. The chapter in Guatemala had a previous interest in gender related activity but no significant experience with the issue. One of TI-S regional advisor’s for Latin America facilitated a contact between the chapter and UN-Women. This led to the organisation of an event in partnership between the chapter and UN-Women in Guatemala. Even if this is a first step towards more content work in the area of corruption and gender, the substantive support provided by the regional advisor was fundamental.

**Involving partners in implementation of activities at chapter level**

Only Argentina, Guatemala, Jamaica, Trinidad and Tobago, Ghana and Nigeria reported activities around partnerships. The Caribbean countries use partnership opportunities mostly as speakers/host in public meetings or conferences. The remaining countries had relationships both with diverse NGOs and community-based organisations, as well as public institutions. The type of partnership varied between chapters having a contractual relationship to provide support and services, training or capacity building to partners, which are then free to use the knowledge as seen fit.

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\(^{14}\) Given the reorganisation and the redundancies, 6 accountants have been involved with the financial reporting of the IMPACT grant over 2 years and there has not been one single accountant overseeing the grant from the start of the programme to its completion. Beyond this turn over, the fact that chapters are allowed to send information in their own language (which, obviously, benefits chapters) poses a difficulty considering the languages spoken by accounting staff at TI-S.
Table 8: Type of partnership activities reported by the National Chapters

<table>
<thead>
<tr>
<th>Countries</th>
<th>Partnerships</th>
</tr>
</thead>
</table>
| **Argentina**   | • partnered with organizations and state actors (to designate Ombudsman and planned G20 meeting, among other activities).  
• with Network of Anti-Corruption Organizations focused on increasing the membership, transfer of tools for advocacy and litigation related to the SDG shadow 16 Report, and trainings of organisations of the network.  
• worked in partnership with international organizations around the G20.  
• contacted organizations in Latin America to work on the misuse of public resources.  
• contacted organizations in the Americas to work on issues of transparency and electoral issues.                                                                                                                                                                           |
| **Guatemala**   | • partnerships with women organisations were signed: for the Collective for the Defence of the Rights of Women in Guatemala”; the “Network of Women of the Department of El Quiché”.  
• MoU with UN-Women Guatemala country office on political participation of women (facilitated by TI’s regional advisor).  
• partnerships with youth organisations (an agreement that involves students from 3 private and one public university).  
• partnership with citizens groups to conduct social audits.  
• partnerships with community groups.  
• MoU was signed with a parliamentarian and the Parliamentary Front Against Corruption.                                                                                                                                                                                  |
| **Jamaica**     | • participation on several conferences, with different organisations, including presentations on integrity and female leadership, empowering young women to run for leadership positions, women working in volatile communities, and fighting corrupt practices at home.  
• participation in international conferences and networking events.  
• working with youth organisations building their technical capacity as leaders and advocates, as well as to deepen their understanding of the governance structures.                                                                                                                                 |
| **Trinidad & Tobago** | • partnerships to host town hall meetings.  
• partnership with the Law School for internships at the ALAC.  
• discuss Auditor General Report, with Auditor General and Integrity Commission and present results to Parliament.                                                                                                                                                                                                 |
### Countries

<table>
<thead>
<tr>
<th>Ghana</th>
<th>Partnerships</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>• partnerships with National Commission for Civic Education (NCCE) and Commission on Human Rights and Administrative Justice (CHRAJ) to persuade student bodies to create integrity clubs.</td>
</tr>
<tr>
<td></td>
<td>• work with the Customs Division of the Ghana Revenue Authority (GRA) to set up billboards displaying the ALAC corruption reporting toll free lines.</td>
</tr>
<tr>
<td></td>
<td>• together with the Ghana Anti-Corruption Coalition (GACC) and Auditor-General of the Ghana Audit Service (GAS) to set-up and man a complaints desk at the office of GAS.</td>
</tr>
<tr>
<td></td>
<td>• joined TI Zimbabwe in presenting a Master Class on Anti-corruption solutions on land.</td>
</tr>
<tr>
<td>Nigeria</td>
<td>Partnerships</td>
</tr>
<tr>
<td></td>
<td>• organizations to serve as ALAC Satellite Offices in select locations at state level.</td>
</tr>
<tr>
<td></td>
<td>• training of partner organisations in order to strengthen capacities of partners to assess corruption risks within and outside their organizations.</td>
</tr>
<tr>
<td></td>
<td>• participation in the co-creation of the next National Action Plan (NAP), of the Open Government Partnership (OGP).</td>
</tr>
<tr>
<td></td>
<td>• Part of the National Steering Committee to review government performance and commitment to the implementation of the OGP and assess the level of coordination among the CSO partners.</td>
</tr>
</tbody>
</table>

Source: IMPACT 2017-2018 Year 2 Report

**Risk identification and management**

The contracts signed by TI-S and NCs provide an assessment of risks chapters believe the may incur by implementing the activities paid for with this grant as show in Table 9 below.
Table 9: Potential risks as assessed in the contract signed by NCs with TI-S

<table>
<thead>
<tr>
<th>Risk type in contracts</th>
<th>Arg</th>
<th>Col</th>
<th>DRC</th>
<th>Gha</th>
<th>Guat</th>
<th>Hon</th>
<th>Jam</th>
<th>Moz</th>
<th>Nig</th>
<th>Peru</th>
<th>TT</th>
<th>Ven</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lack of funds/financial issues</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>x</td>
<td>x</td>
<td></td>
<td></td>
<td></td>
<td>x</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Loss of interest (private sector)</td>
<td>x</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>x</td>
<td></td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Loss of interest (citizens and NGOs)</td>
<td></td>
<td>x</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>x</td>
<td>x</td>
<td></td>
<td></td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Loss of interest (state authorities)</td>
<td></td>
<td>x</td>
<td></td>
<td></td>
<td>x</td>
<td></td>
<td></td>
<td>x</td>
<td>x</td>
<td></td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Loss of interest (international bodies)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chapter staff threatened, attacked or prosecuted</td>
<td></td>
<td>x</td>
<td></td>
<td></td>
<td>x</td>
<td></td>
<td>x</td>
<td>x</td>
<td></td>
<td></td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Partners/citizens threatened, attacked or prosecuted</td>
<td></td>
<td></td>
<td>x</td>
<td></td>
<td></td>
<td>x</td>
<td></td>
<td>x</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>General environment for NGOs deteriorates/reduced space for AC work</td>
<td></td>
<td>x</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>x</td>
<td></td>
<td>x</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Inability to meet expectations/too many cases to handle/lack of technical capacity</td>
<td>x</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>x</td>
<td></td>
<td></td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Cyberattack</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>x</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Corruption within the chapter</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Lack of AC legal framework</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>x</td>
</tr>
</tbody>
</table>

Source: contracts signed between TI-S and NCs for the implementation of the IMPACT grant
This indicates the risk most commonly feared by chapters (with different degrees of likelihood and consequence) is the loss of interest from state authorities and partners/citizens. Prosecution of chapter staff and threats and physical attacks on staff, partners or ALAC users is the second most common risk.

Comparing these stated risks with the challenges mentioned by chapters in the annual reports, an overlap is observed. The two most mentioned risks did materialize (they are contained within challenges 1 and 2 in the Table 7, under Effectiveness). However, risks related to staff (beyond security risks) were not mentioned in most of the cases. Only two chapters indicate a potential risk originating from personnel problems: Mozambique, of not possessing sufficient technical capacity (rated unlikely) and Colombia, of being unable to deal with the number of complaints (rated as likely). And, as observed in the Table 7, staff related obstacles were actually the second most common challenges.

This suggests a need to support chapters more closely not only in preparing a proposal with activities that contribute to the overall strategy but also with a realistic assessment of where things may go wrong. Just as chapters are supported to develop a security protocol, they may need support on how to conduct a risk analysis that assesses issues that may arise due to a chapter’s internal capacity to deliver. Risk analysis is a technical exercise that in the field of development cooperation has become a requirement from donors (DfID 2018) as a safeguard for their fiduciary risk and reputation. It is mostly however conducted by staff with no training on this topic and in an improvised manner. However, beyond being a donor requirement, it is a useful tool for chapters. It forces them to think in a more structure way on issues related to context, to capacity of delivery of activities and partners upon which chapters depend, to the problem of duty of care particularly now that NCs receiving whistle-blowers as well as their management and financial risk. A recommendation in this regard will be presented.

Value for money
Value for money is defined in the context of this review as ‘about striking the best balance between the “three E’s” – economy, efficiency and effectiveness. It is not a tool or a method, but a way of thinking about using resources well spent’ (OECD 2012). With this definition in mind, chapters involved in the IMPACT programme were asked whether this grant provided value for money. They responded positively citing:

- IMPACT allows chapters to build on existing work and capitalise the impact of different projects. Examples come from Colombia and Nigeria. In the first case, another project (the ‘Corruptour’) financed by the Fundación Panamericana para el Desarrollo (FUPAD) was used as a vehicle to advertise the newly established ALAC. In Nigeria, IMPACT funded activities have complemented other projects, financed by different donors, focusing on open government (with the aim of getting Nigeria to join OGP), on anti-money laundering and on Public Financial Management.

- IMPACT enables chapters to enlarge their portfolio. In Peru, the grant allowed the chapter to start monitoring corruption cases in the Amazon region. As part of this work, the chapter established partnerships with organisations with whom they had not previously worked and with whom they intent to continue further collaboration.

- On a more administrative level, IMPACT allows financing of staff salary. This has also been mentioned as value for money, given that other donors only accept to finance substantive activities.
A side effect however is that IMPACT related work has created demands that sometimes chapters cannot meet. In Guatemala, the work of ALAC has caused whistle-blowers from San Pedro de La Laguna, a town in the southeast mostly inhabited by population of Mayan descent, to be sued by local authorities following a denunciation. In this case, the chapter has stepped in to provide legal advice and represent these citizens using the lawyers that work for ALAC.

**Organisational structure of national chapters and their capacity to deliver the objectives established**

As presented in the context section, chapters vary significantly in their size, combination of paid and unpaid staff and the profile of their employees. When asked about whether current staff meets the needs to implement this grant, in general chapters have provided a positive response. In a few cases, they mentioned an increase in receipt of ALAC complaints or given the complexity of cases received would merit hiring more staff or staff with different competencies.

The table below shows a comparison between the number of staffs employed per chapter and the amounts chapter will receive from the IMPACT grant over four years. This should not be understood as the funds being used to pay for the salaries of all this staff (although this is the case for Trinidad and Tobago); nor that the whole chapter personnel may be invested in delivering this grant. In other cases, chapter also count on unpaid work and this workforce is not accounted for. But this data gives an idea of the challenges chapter face in terms of capacity of implementation. This may indicate chapters have difficulty in absorbing the amounts, even when they badly need these resources.
### Table 10: Number of staff and IMPACT transfers over 4 years

<table>
<thead>
<tr>
<th>Country</th>
<th>Amount in '000 euros over 4 years</th>
<th>Number of staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Argentina</td>
<td>11</td>
<td>15</td>
</tr>
<tr>
<td>Colombia</td>
<td>47</td>
<td>14</td>
</tr>
<tr>
<td>Congo DRC</td>
<td>18</td>
<td>16</td>
</tr>
<tr>
<td>Ghana</td>
<td>16</td>
<td>16</td>
</tr>
<tr>
<td>Guatemala</td>
<td>16</td>
<td>16</td>
</tr>
<tr>
<td>Honduras</td>
<td>136</td>
<td>16</td>
</tr>
<tr>
<td>Jamaica</td>
<td>29</td>
<td>16</td>
</tr>
<tr>
<td>Mozambique</td>
<td>29</td>
<td>16</td>
</tr>
<tr>
<td>Nigeria</td>
<td>16</td>
<td>3</td>
</tr>
<tr>
<td>Peru</td>
<td>29</td>
<td>3</td>
</tr>
<tr>
<td>Trinidad and Tobago</td>
<td>15</td>
<td>15</td>
</tr>
<tr>
<td>Venezuela</td>
<td>47</td>
<td>15</td>
</tr>
</tbody>
</table>

Source: number of staffs as indicated by chapters in Focal point questionnaire; transfers indicated by TI-S
An explanation for the best performing chapters could be those that have IMPACT activities most aligned to what they have traditionally done, have clear objectives internally and good technical capacity. This coincides with the view that one of the strengths of the grant is the fact that it boosts activities chapters already had in place, so IMPACT is not perceived as extra work and builds on chapters know how. This assessment raises two points for consideration: the first is that good performers require technical capacity among staff. In this regard, chapters seem to suggest they have staff with the competencies and skills needed, with few exceptions. The second is that other positive features of the grant -- enabling chapters to enlarge their portfolio, entering into new topics and establishing new partnerships --- may have side effects. This grant would push some chapters outside their comfort zone and increase the risks of failure of a particular activity or output, which may compromise delivering the grant.

This is definitely the case for Mozambique and Trinidad and Tobago. In the case of Mozambique, the chapter did suffer with other issues such as security breaches, but it was also expected to change significantly its profile from an academic research institution to a complaint receiving one. It did not work (even if the idea of establishing an ALAC was not part of the initial IMPACT grant contract with the chapter). In the case of Trinidad and Tobago, work on advocacy towards public authorities, with the private sector and engagement with women’s organisations are completely new areas for the chapter.

**Sustainability**

This sub-chapter discusses the dependency of NCs on funding from TI-S and other donors regarding their capacity to sustain results after the grant. It will also discuss the grant’s achievement on work to improve chapter sustainability through one specific output area (1123). In addition, this sub-section assesses the level in which the work funded under the IMPACT grant is likely to be integrated into National Chapters’ future, and the main factors influencing the sustainability of achieved outcomes.
Implementing partners’ ability to ensure sustainability of grant outcomes

Different chapters have different levels of dependency in relation to TI (or other funders and supporters) that are likely to influence the sustainability of the grant outcomes. Financial sustainability of chapters, evidenced by diversity of donors or systematic ability to guarantee funding of activities is important for the ability to sustain the outcomes achieved through the IMPACT grant. As evidenced by the Table 12 below, Argentina, Colombia, Honduras and Nigeria are the ones who demonstrate the best financial independence from TI and other funders, and ability to continue to finance activities and sustain the outcomes beyond the grant. While Guatemala, Jamaica, Peru, Venezuela, Ghana and Mozambique will most likely need to scale down activities, after the grant comes to an end. This is due to a multiplicity of reasons, including the particular context of the country (Guatemala and Venezuela), relative dependency of funding from TI (Venezuela), or little diversity in funding sources (Jamaica, Ghana and Mozambique). The remaining two countries, Trinidad and Tobago and DRC are likely to be unable to guarantee continuity of the outcomes achieved, as their dependency on this grant and TI funding is quite high.

Table 12: Number and types of donors per chapter

<table>
<thead>
<tr>
<th>Countries</th>
<th>Number of donors (excluding TI)</th>
<th>Types</th>
<th>TI dependency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Argentina</td>
<td>10+</td>
<td>International donors, private sector, municipalities</td>
<td>Low</td>
</tr>
<tr>
<td>Colombia</td>
<td>8 + self-financing</td>
<td>Sponsors, sale of services, international donors and foundations</td>
<td>Low</td>
</tr>
<tr>
<td>Guatemala</td>
<td>10</td>
<td>International and national donors and foundations, other TI Chapter</td>
<td>Medium</td>
</tr>
<tr>
<td>Honduras</td>
<td>20+</td>
<td>International donors and foundations, other TI Chapters</td>
<td>Low</td>
</tr>
<tr>
<td>Jamaica</td>
<td>1</td>
<td>USAID</td>
<td>Medium*</td>
</tr>
<tr>
<td>Peru</td>
<td>6</td>
<td>International and national donors and foundations</td>
<td>Medium</td>
</tr>
<tr>
<td>Trinidad &amp; Tobago</td>
<td>13</td>
<td>One-off event contribution from private sector or micro donations of individual members</td>
<td>High</td>
</tr>
<tr>
<td>Countries</td>
<td>Number of donors (excluding TI)</td>
<td>Types</td>
<td>TI dependency</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>---------------------------------</td>
<td>-----------------------------------------------------</td>
<td>---------------</td>
</tr>
<tr>
<td>Venezuela</td>
<td>8</td>
<td>International donors and foundations, sponsorship</td>
<td>Medium**</td>
</tr>
<tr>
<td>Democratic Republic of Congo</td>
<td>3</td>
<td>International donors, private sector</td>
<td>High</td>
</tr>
<tr>
<td>Ghana</td>
<td>6</td>
<td>International donors and foundations</td>
<td>Medium</td>
</tr>
<tr>
<td>Mozambique</td>
<td>5</td>
<td>International donors</td>
<td>Medium</td>
</tr>
<tr>
<td>Nigeria</td>
<td>10+</td>
<td>International and national donors and foundations, other TI Chapters</td>
<td>Low</td>
</tr>
</tbody>
</table>

*Jamaica has only one other donor, and the proportion of TI support is low by comparison. ** TI is the second most important donor to Venezuela, despite diversity of donors and private sponsors.

Source: Questionnaires

In terms of organisational sustainability, none of the chapters seem to be at risk of closing down after the grant ends. However, some of the staff paid through the grant may be difficult to maintain. This is the case, particularly of specifically hired ALAC staff. Chapters, like DRC which has multiple staff paid by the IMPACT grant, and is highly dependent on TI-S funding and support. The same is true for Trinidad and Tobago, which functions on a voluntary basis and is an upper income country, with fewer funding avenues, highly dependent on TI-S funding and support.

On the other hand, chapters have uneven technical capacities, and some require ongoing technical support. Organisational support from TI-S has been weak, chiefly due to the structural changes that saw a reduction in staff, particularly with technical competencies. A good indicator to the risk of weak organisational sustainability is that, despite a concrete output requiring chapters to find alternative funding (1123), this has yet to show results. The departure of the fundraising specialist at TI-S who could drive this process has been mentioned as the reason behind the failure of this output. The lack of technical support means that weaknesses in the implementation of activities will not be identified or addressed. Likewise, there will be insufficient knowledge passed on to chapters to continue implementing technically specific activities.

In terms of programmatic sustainability, most other chapters are working in areas where they have previous know how. The expectation is that, even if they scale down activities, the type of activities carried out will continue. This is true for awareness campaigns and training sessions. This allows for continuity in areas where follow-up is paramount to ensure maintenance of results achieved. There is the risk, however, that in certain cases momentum may be lost, and if activities are abandoned the results are lost. This risk is a possibility with social audit work when it is conducted by volunteers that rely on continuous knowledge transmission.

Chapters have indicated that outcomes like knowledge that people and institutions have acquired cannot be taken away. The same is true for laws and policies. However, experience dictates that without continuous pressure or follow-up, knowledge is lost and policies are not applied. Guatemala and
Venezuela mentioned specifically activities that are likely to be interrupted after the end of IMPACT grant. These include, in Guatemala, the training of women's associations, as well as capacity building of other organisations. In Venezuela, the Municipal Transparency Index survey, support to local governments in open governance initiatives, and support off civil society in the monitoring and support of local governments in instances of crisis would stop. Outcomes from the regional work, that do not depend exclusively on the IMPACT grant, will likely be sustainable.

There are few results to be shown in relation to sustainability of gender outcomes. Most chapters disaggregate data by gender in ALAC complaint forms, as well as in conferences and training events. Chapters also have women in management positions and staff. Overall chapters are likely to be able to guarantee sustainability of institutional structures and practices like these. They are also likely to continue demanding participation and representation by women and other vulnerable groups in their overall activities. This includes favouring partnerships with women organisations.

Knowledge production through the ALAC cases may continue, as all chapters are committed to continue with the ALACs. However, ability to generate profound gender sensitive analysis from the disaggregated data is still rudimentary. This means that meaningful knowledge production, including that produced through targeted research will only be possible with dedicated funding and technical assistance on gender relevant methodological approaches, and gender sensitive analysis. Equally, the chapters are likely to need assistance in providing meaningful recommendations for design or amendment of policies to become more gender sensitive.

Three quarters of the chapters (Argentina, Guatemala, Honduras, Jamaica, Peru, Venezuela, DRC, Ghana and Mozambique) have engaged and produced gender relevant content, beyond gender disaggregated data. However, some of the gender issues raised have only a superficial link to corruption. A stronger input needs to be provided by combined gender and corruption experts to improve capacity for properly identifying links between gender and corruption, and the different effects that corruption has on women.

**Major factors influencing sustainability**

Argentina, Peru, Honduras and Ghana are chapters which enjoy major recognition in their respective countries, and have had prolonged relationships with public institutions. They also have wide acceptance with local communities, even providing credibility to government institutions when conducting joint activities. The results achieved through such alliances are likely to be sustained, as they are based on a long-term relationship, and a certain degree of ownership by the institutions.

Additionally, the long-term nature of the grant has allowed for some time for repetition of activities and routines, reinforcing knowledge and practices. Time has also been enough for some cases to be resolved. Visibility and success have served to reinforce recognition of credibility, contributing for securing future funding, as well as having continued request for activities. Finally, mainstreaming of activities is the activity most likely to guarantee sustainability of some outputs, especially the ALAC.

**Mechanisms in place to ensure maintenance of results achieved**

Chapters are attempting to mainstream the ALACs. This means that any funds they receive in the future, from other donors, should fund such activities. Additionally, chapters consider that training provided to communities, partners and government officials have disseminated knowledge that allows for certain results to be sustained, namely awareness. Additionally, groups involved in social audits, community
based ALAC, volunteer groups, anti-corruption champions and university students receiving training or interns have been empowered with knowledge and abilities that allow for replication of results. Some of them are presently working with reasonable autonomy.

The grant has a specific outcome (1123) which aims at improving sustainability and funding resources to chapters. So far only Jamaica, Trinidad and Tobago, Peru, Guatemala have committed to collecting donations through public tools, to reduce donor dependency. No results have been reported regarding this outcome. Most chapters have reported that they will simply look for funds from other donors, to fund similar activities if IMPACT ends. Some chapters have considered commercialising some of their activities and products, such as trainings and respective materials, through consultancy work.

**Exit strategy**

All chapters intend to start looking for new funding before the IMPACT grant ends. Beyond output 1123 specifically meant to support diversification of funding, at present there is no specific strategy beyond identification of different modes of guaranteeing funds, and no training for fundraising is available for chapters.

Results from some of the activities are slower to materialise, as for example solution for complaints or policy implementation. Although four years is enough to stabilise activities, it is relatively short to guarantee consolidation of some outputs. According to the program managers and some of the programmatic documents, the envisaged timeline for the grant was to reserve Year 1 and 2 for activities leading to outputs (1111, 1112, 1121, 1122, 1123, 1131, 1211, 1212, 1221, 1222, 1311, 1321); in Year 3 they expected to see some of the immediate outcomes emerging (1110, 1120, 1130, 1210, 1220, 1310, 1330), and in Year 4 the intermediary outcomes (1100, 1200, 1300), as per the PMF, would be achieved. This scenario is inward looking, and even in Year 3 and 4 requires activities with outputs from NCs and TI-S teams. Also, it fails to present a clear scaling back of activities, in anticipation of the end of the grant, nor a learning process of how to change if presented with the possibility of a continuation of the grant.

As such, the ideal timeline for implementation of activities would have been Y1 and Y2 for knowledge transmission, awareness raising and training; Y3 would be reserved for co-implementing with partners, providing support and supervision to reinforce their capacity; Y4 would be reserved for learning and adjusting, as well as unwinding direct implementation guaranteeing that implementing partners are able to continue alone. As such, none of the chapters should be planning to implement new activities, but rather consolidating the ones that are already being implemented. Otherwise, there will not be enough time for beneficiaries to take ownership and follow through, after the grant has ended.
Lessons learned and good practices

This section will discuss lessons learned in relation to major factors of achievement of expected outcomes. The positive examples from this grant and how these can inform other TI-S and chapter work are discussed. Unintended negative impacts, particularly related to risks incurred by the chapters, are also discussed in this sub-section. Results will be presented separately at TI-S and at National Chapters’ levels. Most of the lessons learned happened in terms of internal good practices at TI-S or the NCs, whereas the TI Impact Matrix privileges an outward look. Therefore, there were fewer lessons learned relevant to the Impact Matrix components. Where relevant, these will be mentioned.

Lessons and good practices at TI

**Fundraising on behalf of chapters in middle income and upper income countries:** this is a measure among many others that TI-S could envisage to improve funding available to chapters in such countries. It should happen in tandem with the development of a coherent fundraising strategy (and training on fundraising) for chapters that takes into consideration their country’s income contexts with different levels of access to donors and the different operational models/business models of existing chapters.

**Multi-country programmes:** TI-S is in a good position to articulate multi-country programmes such as the IMPACT grant, because it can be a broker between many chapters around the world and the international donor community. TI-S has many contacts among and strong reputation with the donor community -- something that chapters, alone, might not have. In addition, TI-S has more qualified human resources to manage fiduciary risk, one of the reasons for many donors to avoid granting funds directly to small NGOs or to NGOs they do not know and have no time to conduct due diligence on. This is an interesting format for the movement because it allows for larger funding and enables many TI chapters to receive funds to engage in activities that are of interest of the entire TI movement.

**Flexibility of programmes (in terms of areas of spending and reallocation of funds):** the IMPACT grant has been praised by participating NCs for being flexible in allowing them to choose where and how to spend the money. There are, nonetheless, two constraints. One is the limitation on countries involved which reduces the number of chapters that can be supported with such flexibility. The second is that all chapters were pushed to work with ALACs. Within these limitations, the programme is structured in a way that it allows for most organisations working on anti-corruption to find a way to connect it to their own strategic priorities. The side effect of the flexibility and breadth of scope is that it is difficult to show that as an aggregate the programme is achieving one (or several) common measurable goals. However, the one common area (reinforcing ALACs) is a positive common achievement for the movement as a whole.

**Support a movement priority:** the support ALACs have received through outcome 1100 provides a lesson on how to structure the establishment and grounding of movement priorities. The grant has done a great job in making ALACs more solid across the movement, as this is the one output/outcome where most chapters had some experience. Investment in it meant building on existing know how and effectively spending resources. Building on this experience, there could be an advance of other priorities of the movement, present and future. Reinforcing such priorities could significantly contribute to the impacts as envisioned on the TI Impact Matrix.

**Using different grants to pool chapters or to boost one another:** this seems incipient, with some space to grow, and potentially good rewards. For example, there are pooling funding efforts. Even if the IMPACT
grant does not allow for co-funding, in practice, the way some joint events and joint activities are organised, suggests there is a potential for grants to support efforts in a more pre-planned manner. The fact that funds made available by the ACTION grant will be used to finance the attendance of non-IMPACT chapters at the annual membership meeting during the IACC (while IMPACT chapters will attend financed by IMPACT) is a good example. Another good example comes from the LAND project in Ghana. The local ALAC is using knowledge and partnerships established through the implementation of LAND project (which includes research) to train women farmers as paralegals (including on issues related to rights on land ownership, which are among complaints at the ALAC). Finally, another good example is the integration of CRIMJUST within the IMPACT programme. While some chapters conduct research related to the justice and security sector financed by IMPACT funds, the number of chapters conducting such research is enlarged given that others are able to do the same using EU/UNODC funds. In every instance, the results produced from pulling efforts and resources were reinforced and potentially increased.

Africa regional support structure: each region of the continent has dedicated advisors who can better assist chapters due to their knowledge of specificities of their respective sub-region and possible challenges. The availability of the advisors has been praised, and even when the assistance required is provided by someone else at TI-S, chapters include advisors in the correspondence. Program managers would benefit greatly in capitalising better on this knowledge, by guaranteeing regional advisors' inputs for content support during implementation, hence beyond the initial process of programme design/initial planning.

Lessons and replicable practices from Chapters

Exchange between chapters: this is a lesson that regards both NCs and TI-S. Several respondents mentioned the positive outcomes of the opportunity some chapters had from learning from others. Learning opportunities were created, for example, before setting up an ALAC (Colombia visited Honduras. Several African chapters visited Rwanda). These visits also led to other exchanges between chapters, not mediated by TI-S. Such are important opportunities for learning, but also for strengthening regional networks and cooperation. TI-S is well placed to stimulate such exchanges, for example across regions, as well as targeting champion chapters in different issues, such as mainstreaming gender, diversifying income sources or exemplary fundraising.

Strength in networks: smaller and isolated chapters like Trinidad and Tobago may go unnoticed in a region like Latin America with a strong network of Spanish speaking chapters. They are more ‘at home’ with fellow Caribbean countries, such as Jamaica. The chapter in Trinidad and Tobago has also had interactions with Guyana, which initiated contacts with TI-S to become a chapter. In addition, Caribbean chapters together with TI-S drafted a concept note for a regional network, to reinforce the region’s capacity, including through increased knowledge of opportunities to collective fund activities or pool knowledge. This is an area where TI-S could also support, by facilitating the actual implementation and functioning of the network.

Reinforcing areas where National Chapters excel: the grant was flexible in allowing NCs to choose where and how to spend the money. Most of them chose to reinforce areas in which they were already active. Most of the chapters agreed that this reinforcement allowed them to reach more beneficiaries and expand the services they would otherwise not be able to do. This has meant that these activities started producing results immediately, as they built on previous experience.
Good collaboration with public institutions: the movement’s approach, which favours a non-antagonistic relationship with public institutions (target of efforts for improving transparency and integrity) has the potential of producing better and faster results. In any event, it allows for continuous collaboration.

ALAC Steering committee: in Ghana the ALAC has a Steering Committee composed of the most important public institution to which complaints are forwarded. The committee meets every quarter, and each institution has a focal point to whom complaints are addressed, and who has the responsibility of following through the redress at the institution. This practice has built trust and ownership and is likely to lead to true institutional change.

Commitment and tenacity: maybe not an easily replicable practice, but a noteworthy characteristic of some chapters. The level of commitment and tenacity among staff and of victims/whistle-blowers arriving to ALACs seems particularly high. This may be a common feature of individuals working for similar organisations, but it is a characteristic that should be rewarded. A possibility would be to honour some of the ALACs victims/whistle-blowers, for example, with the TI’s Anti-Corruption Award. In regards to chapter staff commitment, two examples come from Ghana and Trinidad and Tobago. In the first case, victims in the ALAC mentioned the tenacity of the person hired to staff the ALAC in pursuing tirelessly the public authorities responsible for providing victims with a response or redress. In the case of Trinidad and Tobago, the engagement of the board members – many of which are employed fulltime elsewhere, but take days off to work for the chapter pro-bono.

Cooperation between ALAC and investigative journalism: this is an area that has as much potential as challenges. It should, perhaps not be attempted in all chapters, but only in those where investigative journalism has some tradition and quality. Support to ALAC work by investigative journalists has the potential of assisting in solving cases with limited evidence. Provided that all precautions are followed to protect the complainers, witnesses or even the ALAC, the journalist’s piece can be a good showcase of the type of cases received by the ALAC.

Unintended negative impacts
The chapters, for the most part, anticipated risks to the implementation of the grant. However, these risks were not typified (e.g. risks due to internal capacity, partners' capacity, context, duty of care, etc.). Likewise, mitigation mechanisms and contingency actions were not specified.
Recommendations
This section provides recommendations on where the grant should focus its actions and efforts. Additionally, based on the weaknesses and strengths identified in section 4, the section provides recommendations on which areas the grant could improve capitalising on its strengths and how weaknesses should be addressed in order to improve outcomes. Finally, based on lessons learned and good practices identified, this section also suggest which practices could be more easily spread across chapters. Gender related recommendations will be presented separately. The recommendations specify who should implement the recommendations, and provide a prioritisation (in the short term, considering the time still available under this grant, or for future grants). Recommendations marked in bold under each area are considered the priority for that area.

**Immediate**

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<td>Impact</td>
<td>Stop growing and consolidate</td>
<td>Make sure activities for Y3 or Y4 do not entail expansion of activities/new activities, but consolidation of activities initiated in previous years. Reserve Y4 to rollback, while guaranteeing beneficiaries and partners are able to continuing actions where chapter is likely to withdraw after the end of the grant.</td>
<td>TI-S Program managers and chapters&lt;br&gt;M&amp;E responsible at chapter to propose way to monitor partners' capacity to carry on without the chapter&lt;br&gt;TI-S to assist chapters which do not have M&amp;E capabilities</td>
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<td>Assess possibility of creating ALAC steering committee, or other mechanisms of support for redress</td>
<td>Map institutions where ALAC cases are most frequently referred to, as well as other strategic allies for redress&lt;br&gt;Contact institutions to assess likelihood of the institutions in forming an ALAC Steering Committee, or other alliance solutions (check across the movement for replicable redress solutions)&lt;br&gt;Request a focal point at strategic institutions for redress correspondence&lt;br&gt;Design the objectives and guidelines for the Steering Committee</td>
<td>ALAC responsible within chapters should identify institutions&lt;br&gt;ALAC responsible and IMPACT managers within chapters to assess likelihood of institutions to join the ALAC Steering Committee&lt;br&gt;Chapter, together with interested institutions design Steering Committee guidelines&lt;br&gt;TI-S assist interested chapters to visit and learn from Ghana experience</td>
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<td>Ghana to hold a webinar to share their experience with all IMPACT chapters/ If possible, interested chapters should visit Ghana</td>
<td>Chapters that provide evidence of their experience</td>
<td>TI-S disseminate the information (coordinate with TI-S policy and advocacy team, which is exploring investigative journalism issues)</td>
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<td>Use investigative journalism to support ALAC work, where relevant</td>
<td>Chapters with experience with investigative journalism benefits and challenges share their experience with the rest of the IMPACT chapters</td>
<td>Chapters that provide evidence of their experience</td>
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<td>Interested chapters discuss with TI-S intention to utilise investigative journalism to support ALAC work</td>
<td>TI-S disseminate the information (coordinate with TI-S policy and advocacy team, which is exploring investigative journalism issues)</td>
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<td>Sign MOUs with journalists and train on deontological and ethical issues, mutual added value, and potential risk for both parties</td>
<td>Chapters inform TI-S of interest in using journalists, sign MOU's, train journalists and use result of work as evidence</td>
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<td>Utilize eventual news pieces as evidence of their work, including for future granting purposes</td>
<td>TI-S assist chapters without capacity by capitalising on chapters with experience</td>
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<td>Effectiveness</td>
<td>Improve one single monitoring instrument to consistently show progress achieved in an overview manner</td>
<td>Identify one spreadsheet or other monitoring instrument that shows overall progress per chapter providing an overview of the programme (suggested: spreadsheet produced after the Maputo April 2018 meeting)</td>
<td>TI-S (IMPACT programme managers) to complement Maputo April 2018 meeting spreadsheet, with missing countries and use it consistently</td>
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<td>Ensure that all 12 chapters appear, with individual data on baseline, targets and progress achieved per Y1, Y2, etc.</td>
<td>TI-S (IMPACT programme managers) to input information in that spreadsheet as chapters submit information and monitor it against planned outputs and targets</td>
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<td>Foster relationships among chapters in different regions to increase learning and exchange networks</td>
<td>Identify potential themes and/or regional and linguistic affinity among chapters in different regions</td>
<td>TI-S &amp; chapters to identify themes and identify placements</td>
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<td>TI-S to finance the scholarship travel between chapters</td>
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IMPACT grant mid-term evaluation Final Report
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<td>outside of the traditional ones</td>
<td>Using underspent funds, establish a scholarship travel system in the last year of the grant to allow, for example, ALAC staff of one chapter to visit a counterpart in the other region of the programme (the same principle applies to learning exchanges on other areas, such as gender or social accountability)</td>
<td>Host chapters to support organisation of logistics to receive scholars</td>
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<td>Re-structure annual report on results per outcome instead of a compilation of narrative/images of each chapter report</td>
<td>Reconsider the outline of the annual report to a different structure other than compilation of narratives per NC; Suggestion to structure based on show programme results on outcomes 1100, 1200 and 1300 / Each outcome could be illustrated with progress and highlights from chapters &amp; regional work; If requested by donors, the compilation of chapters’ narratives could continue to be issued</td>
<td>TI-S (IMPACT programme managers) to review structure of the report; TI-S (IMPACT programme managers) to analyse narrative reports by chapters and extract data to produce this aggregate programme report</td>
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<td>Support the establishment of a network among existing and potential chapters in the Caribbean</td>
<td>Continue the pursuit to implement a network in the Caribbean to foster support and knowledge exchange; Add one additional staff to the regional advisors team with specific knowledge of the Caribbean region (ideally English/Spanish/French speaking), with specific mandate to boost the region’s chapters capacity</td>
<td>TI-S to pick up the concept note and the hiring of staff to support Caribbean chapters; TI-S (IMPACT programme managers and LAC regional advisors) organise a discussion with Jamaica, Trinidad and Tobago and other national contacts in the Caribbean at IACC in tandem with membership meeting; Invite champions from Latin America to share their experience about how the Spanish speaking network emerged (suggestion Venezuela, Guatemala and Argentina)</td>
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<td>Efficiency</td>
<td>Boost execution of ‘low hanging fruits’ in chapters falling behind</td>
<td>Select a small number of chapters to provide closer support to implementation in the remaining time of the programme&lt;br&gt;Discuss with selected chapters (on a one to one basis) which challenges are the easiest to solve with expertise support from TI-S or funds, given the underspent, to increase achievement of outputs in the remaining of the programme</td>
<td>TI-S to identify which chapters would be a priority for support&lt;br&gt;TI-S to discuss with these chapters which areas they see as easier to achieve results&lt;br&gt;Identify actions needed to foster the execution of successful outputs, and report (if necessary with an amendment to the contract)</td>
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<td>Provision of more substantive support to chapters in execution of activities</td>
<td>Hire or indicate technical support to chapters to contribute to execution of activities in the remaining annual plans (themes gender, ALAC, institutional development, fundraising and other)&lt;br&gt;Consider the inclusion of regional advisors in support to domestic work at chapter level given their knowledge of the regions/ rethink the division of IMPACT grant (and other similar grants) responsibilities under different teams</td>
<td>TI-S to hire or assign TI staff to support, with suggest from IMPACT programme managers when they have the technical knowledge&lt;br&gt;Chapters with knowledge on the substantive areas could also be invited to support other chapters and contact with chapter in need could be initiated by TI-S</td>
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<td>Sustainability</td>
<td>Prepare postcards that illustrate successful stories of impact achieved with this grant</td>
<td>Establish criteria on how to evaluate and describe a success/impact case (use in-house experience from regions who have done similar activities, such as APP)&lt;br&gt;Identify cases that illustrate success of grant application</td>
<td>TI-S to define criteria and description parameters for postcards and share with chapters&lt;br&gt;Chapters to submit 1-2 cases they consider their best example of success of grant application, based on agreed criteria&lt;br&gt;TI-S to select the best cases and explain reasons for choice&lt;br&gt;TI-S to make available all cases to all chapters</td>
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| Gender mainstreaming         | Have a gender and corruption specialist available to support chapters      | Make available a specialist with both gender AND corruption expertise (or form a duo with knowledge in both topics) to assist chapters identifying the corruption issues that affect women and men differently in each chapter (this can be in-house, from the new TI-S gender working group or an external consultant) | TI-S to hire gender specialist  
Gender specialist to identify gaps in gender mainstreaming compliance in the IMPACT assessment  
Gender specialist to design and propose a realistic plan to improve gender related performance |
|                              |                                                                            | Identify gaps in gender mainstreaming compliance per chapter                                                                                                                                              |                                                                             |
|                              |                                                                            | Design a plan for each chapter to achieve gender performance targets, considering availability of staff, strategic partnerships, experience in mainstreaming gender, etc.                                      |                                                                             |
| Beyond the grant             | Identify champion chapter (beyond IMPACT chapters, if necessary) on gender issues | Identify chapter that can become a champion on gender issues due to advanced research or activities including gender and corruption  
Identify strengths and weaknesses of the chapter in the area of gender  
Identify areas of growth and replication  
Provide opportunities for IMPACT chapters to interact with champion chapter | TI-S with the assistance of the gender specialist to identify champion chapter  
Gender specialist to assist future champion to grow into champion role |

**Beyond the grant**

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<td>Relevance</td>
<td>Improve future proposals and project plans</td>
<td>Chapters need more back and forth with TI-S to receive guidance during drafting of proposals</td>
<td>TI-S to request chapters and regional advisors’ contribution at a minimum for contextual input, as well as risk assessment (risk understood as</td>
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<td>Impact</td>
<td>Provide training or exchange on litigation</td>
<td>Identify chapters that could benefit from litigation training</td>
<td>TI-S to identify beneficiary chapters and/or champion chapter</td>
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<td>Offer training or exchange between chapters on litigation</td>
<td>Alternatively, chapters can request for training</td>
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<td>Two possibilities that could be rolled out on a long-term ongoing basis (mentioned under relevance):</td>
<td>TI-S to provide training or facilitating exchange between beneficiary and champion chapter</td>
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<td>Efficiency</td>
<td>Provide more substantive support to chapters in development of proposals, programme planning and execution of activities</td>
<td>Beyond training in security, offer training on how to develop proposals &amp; programme</td>
<td>TI-S to consider best practice manuals similar to the its existing guidelines on monitoring and evaluation</td>
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<td>TI-S to identify champion chapters on different themes</td>
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<td>Sustainability</td>
<td>Chapters with weaker funding base to diversify funding sources</td>
<td>Planning as well as risk assessments (beyond security threats)</td>
<td>TI-S and chapters to look for opportunities to maximise exchanges among chapters</td>
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<td>Consider different types of donors (e.g. foundations), consultancy, sale of services or materials</td>
<td>Chapters map funding opportunities in their countries, assisted in the region by regional advisors or own networks assisted globally by TI-S</td>
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<td>Alternatively develop proposals for/apply for funding in other thematic areas (e.g. education, health, climate change), proposing an analysis from a perspective relevant to TI-S</td>
<td>Thematic experts within TI or within TI's network to assist chapters to identify thematic funding opportunities</td>
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<td>Invest in multi-country grants, targeting the inclusion of high- and medium-income countries</td>
<td>Prioritise applying to multi country/multi-year proposals</td>
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<td>Try as much as possible to include in those grants high and medium-income countries</td>
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<td>Familiarise and remain updated with the thematic interest of donors for these countries (often they are in other themes, which can easily be related to corruption – e.g. bribes as a barrier to access to basic services)</td>
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<td>Improve communication efforts to publicize the success stories and impacts on individual, community and countries' lives</td>
<td>Use formats other than reports (e.g. TV spots, YouTube channel, documentaries, etc.)</td>
<td>TI-S and chapters</td>
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<td></td>
<td>Discuss chapters' business model and assist them in adapting to a better sustainability strategy</td>
<td>Map types of business models (voluntary base, donor dependent, mixed donor and own funds)</td>
<td>TI-S and chapters</td>
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<td>Map best practices in different models</td>
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<tr>
<td>Areas</td>
<td>Objectives</td>
<td>Actions</td>
<td>Responsible</td>
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|       | in their existing model or transition to another model (as per chapter request) | Provide training or opportunities to chapters on assessing possibilities to join efforts for different funding possibilities in their country and regions  
Share knowledge on diversification of funding sources, including visiting chapters (e.g. Honduras and Mauritius which have high levels of funding and variety of donors/business models) | |
| M&E   | TI-S to monitor closely and provide support to chapters when entering new topics/areas | IMPACT allowed some chapters to enlarge their portfolio. In these cases, there is more risk of failure given lack of former experience, so more regular contact should be ensured between secretariat and chapter on the needs to execute such plans  
It may be necessary to increase the TI-S staff supporting M&E activities | TI-S and chapters engaging in new areas |
|       | Improve outcome indicators and make clearer links between outputs and outcomes | Support chapters to understand and justify how and why target outputs will lead to planned outcomes  
Design outcome indicators that truly measure outcomes, and not outputs (e.g. on the outcome: 'Increase public understanding', the ideal indicator is not how many people participated in awareness/training events, but rather how much they knew before, and how much they know after the activity, measured by key indicators) | TI-S (MEL department) and chapters (this could be part of the training to improve proposal design and implementation planning mentioned above) |
<table>
<thead>
<tr>
<th>Areas</th>
<th>Objectives</th>
<th>Actions</th>
<th>Responsible</th>
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<tbody>
<tr>
<td>Gender mainstreaming</td>
<td>TI-S to include gender mainstreaming/gender and corruption as a key strategic area for the movement</td>
<td>Always have a baseline against which to measure progress&lt;br&gt;During the next strategic revision, consider including gender and corruption as a strategic area to be developed and pursued across the movement&lt;br&gt;Identify chapters and regions with relevant experience and good practices to spearhead the efforts and share the experience across the movement</td>
<td>TI movement as a whole</td>
</tr>
</tbody>
</table>
References


TI (to be published): Social audits in Guatemala, Peru and Ghana: 10 ways to leverage impact of social audits to fighting corruption.


National chapter strategies (several documents)
Annexes
List of informants

<table>
<thead>
<tr>
<th>Interviewee</th>
<th>Function</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lucas Olo Fernandes</td>
<td>IMPACT grant project management</td>
<td>30/07</td>
</tr>
<tr>
<td>Arielle Joseph</td>
<td>IMPACT grant project management and CRIMJUST</td>
<td>30/07</td>
</tr>
<tr>
<td>Thomas Kaye</td>
<td>SAFE programme</td>
<td>31/07</td>
</tr>
<tr>
<td>Paul Banoba</td>
<td>East Africa regional advisor</td>
<td>31/07</td>
</tr>
<tr>
<td>Coralie Pring</td>
<td>Global Corruption Barometer</td>
<td>31/07</td>
</tr>
<tr>
<td>Mahmoud Farag</td>
<td>People engagement/ Social accountability expert</td>
<td>31/07</td>
</tr>
<tr>
<td>Alejandro Urizar</td>
<td>LAC regional advisor</td>
<td>16/08</td>
</tr>
<tr>
<td>Luciana Torchiaro</td>
<td>LAC regional advisor</td>
<td>16/08</td>
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<tr>
<td>Samuel Kaninda</td>
<td>West and Central Africa regional advisor</td>
<td>23/08</td>
</tr>
<tr>
<td>Marta Erquicia</td>
<td>MINING programme</td>
<td>21/08</td>
</tr>
<tr>
<td>Tomas Rehacek</td>
<td>ACTION programme</td>
<td>21/08</td>
</tr>
<tr>
<td>Thomas Richter</td>
<td>IMPACT programme accountant</td>
<td>16/08</td>
</tr>
<tr>
<td>Alessandro Gianesini</td>
<td>Chapters financial risk assessments</td>
<td>17/08</td>
</tr>
<tr>
<td>Rute Caldeira</td>
<td>TI MEL director and part of TI-S management team</td>
<td>24/08</td>
</tr>
<tr>
<td>Tapiwa Nyasulu</td>
<td>Southern Africa regional advisor</td>
<td>28/08</td>
</tr>
<tr>
<td>Staff at Ghana Integrity Initiative</td>
<td>National chapter in Ghana</td>
<td>3-6/09</td>
</tr>
<tr>
<td>Staff at Trinidad and Tobago Transparency Institute</td>
<td>National chapter in Trinidad and Tobago</td>
<td>4-6/09</td>
</tr>
<tr>
<td>Beneficiaries from Ghana Integrity Initiative</td>
<td>3-6/09</td>
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<tr>
<td>Beneficiaries from Trinidad and Tobago Transparency Institute</td>
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Instruments
See accompanying PDF