



ANTI-CORRUPTION: Delivering Change

Annual Report 2009
(AC:DC) / (GTF 085)

PROGRAMME IDENTIFICATION DETAILS

GTF Number	085
Short Title of Programme	Anti-corruption:Delivering Change (AC:DC)
Name of Lead Institution	Transparency International
Start date ¹	08/09/2008
End date:	07/09/2013
Amount of DFID Funding:	GBP 4,673,672.26
Brief Summary of Programme:	Transparency International aims to increase standards of governance and transparency by empowering its National Chapters (NCs) and citizens to address corruption through evidence-based advocacy and to pursue corruption-related complaints.
List all countries where activities have taken or will take place	See Annex 7
List all implementing partners in each country	See Annex 7
Target groups- wider beneficiaries	Advocacy and Legal Advice Centres (ALACs) = Government Authorities & General Public in 26 countries Evidence-based Advocacy= Government Authorities, Non-state Actors, including academics & experts & General Public in 26 countries
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LIST OF ACRONYMS

Africa & Middle East (AFME)
Americas (AME)
Anti-Corruption: Delivering Change (AC:DC)
Asia & Pacific (AP)
Benchmarking and advocacy tool on transparency in political finance (CRINIS)
Europe & Central Asia (ECA)
Facing Information Technology (IT)
Governance and Transparency Fund (GTF)
Log-frame Matrix (LFM)
Monitoring and evaluation (M&E)
Most Significant Change (MSC)
National Chapters (NCs)
Non-State Actors (NSAs)
Papua New-Guinea (PNG)
Political Corruption Component (POLITICS)
Research, Stakeholder & Implementation (RSI)
Safe-guarding Anti-corruption Fighters' Efforts (SAFE)
Transparency International (TI)
Transparency International Secretariat (TI-S)
UN Convention Against Corruption (UNCAC).

EXECUTIVE SUMMARY

The Anti-Corruption: Delivering Change (AC:DC) Programme, a beneficiary of the Governance and Transparency Fund (GTF 085) aims to promote good governance and reduce corruption in 26 countries by advocating for effective anti-corruption policy and practice at all levels of government. Compelling evidence is being gathered on corruption in diverse sectors and from victims and witnesses of corrupt acts to build a persuasive case for change.

Through the base-line survey, all the Transparency International (TI) Chapters have reported some level of cooperation with government authorities, being well in line with the general TI policy of constructive engagement. The TI Chapters have also demonstrated capacity to advocate for change. The circumstances appear to be conducive to producing significant impact on government policy and practice during the life-time of the programme. The main risks stem from the limited space of civil society to operate in a given country and the lack of political will and capacity of government authorities to act upon the evidence and advocacy efforts generated by the TI Chapters.

Eleven Advocacy and Legal Advice Centres (ALACs) are now open to the public in a number of countries in Africa, Asia, Europe, Latin America and the Pacific Islands. Government authorities have generally welcomed the launch of the local ALAC, though in Zimbabwe, the clear evidence of the prevalence of corruption in the justice

and law enforcement sectors provided by the 312 complaints to the office has enraged the Attorney General.

In Pakistan, initial contacts with the Supreme Court have resulted in instructions from the Chief Justice to open complaint cells in the Supreme Court and all High Courts to process corruption complaints against the justice system.

In Montenegro, advocacy efforts by the ALAC have resulted in the improvement and adoption of the Conflict of Interest Law.

The ACDC programme has only been running for ten months and the results achieved are significant; particularly when considering value for money. Once all sixteen of the planned ALACs are open and the research completed on themes as diverse as conflict of interest and political finance, the expected impact is even higher.

PROGRAMME MANAGEMENT

Programme Management

GTF 085 is managed by Transparency International Secretariat (TI-S), with the majority of activities taking place in TI chapters. At TI-S, overall responsibility lies with the Managing Director, Cobus de Swardt. The daily operations are tasked to the Global Programmes Department and the Programme Manager, Johanna Polvi, who was hired in September 2008. She is supported by a team of technical advisors on the main themes of the programme: Advocacy and Legal Advice (ALACs), research, political corruption and capacity development. Due to the global expansion of the ALACs, sources of additional resources are currently being explored to support particularly the advocacy, capacity development, financial management, fundraising and monitoring and evaluation aspects of this work.

Regional Departments

Main responsibility for the relationships with TI Chapters remains with the respective regional departments,¹ with the GTF Programme Manager coordinating their work. The regional departments are organized either by theme or by geographic responsibilities. Both the Africa and Middle East Department (AFME) and Asia Pacific (AP) have dedicated ALAC Programme Coordinators who are 50-60% funded by GTF 085. These positions were filled in January 2009. The other departments have dedicated time from the respective Programme Coordinators to liaise with the TI chapters in the framework of GTF 085. The Americas team has recently been reinforced due to maternity/paternity leave and new commitments.

Due to the size of the team, regular meetings are held based on the thematic and geographic needs of the programme. Roles and responsibilities have been clearly delineated (see Annex 8 for RACI Chart), with Regional Departments being the main contact point for TI chapters, while the GTF Programme Manager is the sole interlocutor with DFID/KPMG/Triple-Line.

¹ Africa & Middle East (AFME), Asia & Pacific (APC), Europe & Central Asia (ECA), Americas (AME)

Financial Management

The GTF Programme Manager receives support in the financial management of GTF 085 from the Finance Department. Due to the growing amount of project-related funding at TI, the Finance Department is amidst a reform process, which includes the introduction of new financial management software that will include a project management module. By July, GTF 085 will have a dedicated staff member in the Finance Department. Besides the GTF Programme Manager, none of the positions are fully financed by GTF 085.

A number of TI-S wide initiatives to develop 1) TI chapter capacity 2) project financial management 3) Monitoring and Evaluation (M&E) and 4) risk will bring indirect benefits for GTF 085 in the course of the coming months.

WORKING WITH IMPLEMENTING PARTNERS

The partnership with the TI chapters is at the core of the ACDC/GTF programme and is also fully in line with the TI Strategy 2010. TI chapters are legally independent entities with individual management structures, which include financial management systems. The engagements with individual TI chapters remain, as foreseen, in the *Inception Report*. (Annex 7)

TI-S has already informed GTF management of the extraordinary review of the membership status of Paraguay, which may result in its disaccreditation. Should the TI chapter be disaccredited, TIS will contact GTF management on the best way to deal with the funds committed to Paraguay.

Since the implementation of the *Benchmarking and advocacy tool on transparency in political finance* (CRINIS) study requires the existence of preconditions, such as minimum legal requirements for regulating political financing, free access to information and key stakeholders, it was concluded that present conditions in Uruguay are not conducive to conduct a fully-fledged CRINIS study. The possibility of re-committing the funds to another project are being considered. No additional countries would be added to GTF 085; only funds shifted within the programme.

Sub-project Planning

All of the TI chapters have been involved in the planning of their individual sub-projects from October 2008. For the ALAC component, the Inception Phase concluded on 31 March 2009. The Inception Phase consisted of a separate six month contract to liaise with stakeholders, including governmental authorities, hire staff, identify office space and conduct other preparations for the launch of the ALAC. Thorough planning documents, including the review and adaption of the core ALAC log-frame, risk analysis and development of a detailed budget, were also prepared during this time for the remainder of the programme. (Templates available on request.)

The TI chapters in the Research, Stakeholder Initiatives (RSI) and Political Corruption (POLITICS) component have also been preparing detailed planning

documents. These include, a stakeholder analysis, log-frame, risk analysis, work plan and budget for the entire length of their respective sub-projects. (Templates available on request.) Only 60 per cent have been signed to date. (see Section 6. Risk)

Reporting

TI chapters report quarterly on both the operational and financial management of their sub-projects. Narrative reporting focuses on identifying progress on log-frame indicators, management issues, risk and collecting stories of change at purpose/outputs level of the logic of intervention. Financial reporting is conducted on the basis of excel workbooks developed for GTF 085 (Templates available on request). In addition to the annual TI-S audit that is required by the Grant Agreement, TIS has also introduced project-specific audits of TI chapter sub-projects. These audits are conducted in sync with the British fiscal year. All TI chapters with expenditure over £8,500 prior to 31 March 2009 have submitted their audited accounts, which are the basis of the financial reporting in Annex 3. TI Ghana has not yet submitted their audit report, but it is expected shortly. The figures will be adjusted accordingly, with final audit figures appearing in the audited TI-S accounts next year. The TI Audited Accounts for 2008 can be found in Attachment 4. The relevant line can be found on page 27.

TI Chapter and ALAC Staff

All TI chapters delegate to their given sub-projects. In addition at least 15 per cent of the time, a financial assistant has been included in every budget. For ALACs, sufficient legal capacity has also been a basic requirement. In the majority of the ALACs the additional staff required for running the operation have been recruited, however the process has taken longer than originally foreseen, due to a number of unforeseen set-backs. The recruitment pool of qualified personnel is very limited in a number of countries, particularly in the Pacific islands. For example, in Fiji, the ALAC Coordinator resigned after one month for personal reasons, as did the ALAC Coordinator in Pakistan after just three months in the position. The recruitment process for the ALAC Coordinator in Papua New-Guinea (PNG) has not been successful and the position will be re-advertised. Often the identification and recruitment of legal expertise has proven difficult, especially within the budget constraints. Vanuatu has struggled to identify both an ALAC Coordinator and a Legal officer, are to be recruited in July 2009.

RISK ASSESSMENT

The main risks to GTF 085 stem from the limited space of civil society to operate in a given country and the lack of political will and capacity of government authorities to act upon the evidence and advocacy efforts generated by the TI chapters. The TI policy of constructive engagement with the authorities has usually mitigated these risks, with some exceptions.

Another major risk is TI chapter capacity to implement their sub-projects. In the non-ALAC sub-projects, the definition of purpose and results and the related indicators,

has proven particularly difficult. There is also a need to further develop the advocacy skills of TI chapters. These capacity issues have resulted in significant delays in the launch of individual sub-projects, with only 60 per cent signed to date. These capacity issues have been addressed on a one-on-one basis via e-mail and telephone by TI-S. The quality of financial and narrative reporting has improved in comparison with the third quarter, additionally newly recruited staff has increased their skills.

The following workshops are also planned:

27-30 July 2009, Berlin: *NIS, ACDC/GTF Management & Log-Frame Development*
Armenia, Georgia, Ethiopia and Kenya

8-11 September 2009 (venue tbc): *ACDC/GTF Management, M&E & Impact Measurement, Advocacy* - Chile, Colombia, Mexico, Nicaragua, Venezuela

ALACs have not experienced the same capacity issues, as there is an existing ALAC concept (and core log-frame Annex 10) that only needs to be adapted to local circumstances. However, capacity issues specific to ALACs have been and will continue to be addressed through workshops as follows:

13 – 30 January 2009, Azerbaijan, Guatemala, Zambia: *Regional ALAC Workshops*

23 – 27 November 2009 (venue tbc) *Global ALAC Workshop*

Image 1 & 2: Participants at ALAC Workshops in Guatemala and Zambia



An additional challenge that exacerbates the capacity risk can be defined as cultural or traditional, relating to the relationship between TI-S and TI chapters. Due to the independence of TI chapters, there is no formal hierarchy in this relationship. As TI-S has previously also not channelled funds of this magnitude to the TI chapters, there is little experience with accountability for results and finances to TI-S. This is particularly the case in Latin America, where TI chapters existed prior to the TI Movement.

Please see the risk matrix for an overview of the risk assessment of the whole programme in Annex 9, and Attachment 1 for details on ten of the twenty-six TI

chapters working in particularly challenging contexts. The Solomon Islands and Palestine are not yet included, as the sub-projects have not been fully defined.

ALAC Specific Risks

A related concern is that of TI chapter and ALAC staff physical security. TI chapters are encouraged to develop individual security plans and to share them with other TI chapters. Security has been and will continue to be one of the main themes of all ALAC workshops. TI has developed a separate programme on Safe-guarding Anti-corruption Fighters' Efforts (SAFE), which will include many countries in the ACDC programme if funding is obtained from the EC. Some security related work has also been done on a pro-bono basis by Kroll for TI. TI-S is also seeking closer collaboration with NGOs specialised in this area. While no major incidents have been recorded to date, there have been manifestations of malcontent; for example, an unidentified caller in Vanuatu who verbally threatened the ALAC by telephone.

An ALAC specific risk is that legitimate cases of corruption will not be brought to the ALAC in sufficient numbers. According to the ALAC staff in Pakistan, "People feel it is faster to pay a bribe and get their work done, than to make complaints". In Nigeria, there is concern that cases brought to the ALAC are only by those who have not benefitted in corrupt deals, therefore being an integral part of the problem and potentially embroiling the ALAC into the problem as well; eventually tarnishing the reputation of the approach and office.

M&E ARRANGEMENTS

As stated in the *Inception Report*, the Monitoring and Evaluation (M&E) of GTF 085 is independent from the general monitoring and evaluation plans of TI as a whole, though there will eventually be some mutual benefits that arise to both arrangements. The TI *M&E System* will be designed by a consultant between July – October 2009, with the permanent position being filled by October 2009. Again, the *GTF 085 M&E System* is in no way dependent upon these developments.

Database

For the moment, the ALACs are using the existing database to upload the client, contact and case data. The database has been successfully installed in most ALACs, though some are still facing Information Technology (IT) difficulties. The Second Generation ALAC database for the ALACs is under development since April 2009. A short-term solution has been devised to ensure the efficient processing, storing and analyzing of data. Feedback and lessons learnt from TI chapters are currently being integrated into a functional requirements document. The new ALAC database will be launched in all countries in early 2010. This will further support and enhance data collection and comparison across all ALACs.

Evaluation

With regard to the mid-term and final evaluations, the planned peer assessment will be facilitated by a centrally-contracted external consultant. A part of the terms of reference will be to incorporate the peer-review component, without losing the objectivity of an external review. Participants from other GTF beneficiaries will

facilitate the implementation of the evaluation, providing both thematic and regional support to the consultant and ensuring that there is direct learning from the evaluation experience across the programme. This will promote evaluation generally as a learning tool, not only as an external control. As it will not be feasible to cover all countries, the sample will be carefully delineated through defined criteria, ensuring representation across the geographic and thematic scope of the programme, as well as identifying both good and poor performers. It is estimated that approximately 25% (4-6 countries, depending on budget size) of the sub-projects can be externally evaluated in the current resource framework. Additional countries can be covered through the possibilities provided by peer-review.

M&E Costs

The M&E costs of the programme are distributed across budget-lines, not limited to the specific budget-line for M&E. It would not be feasible or even desirable to delineate the monitoring component from the daily management costs (staff salaries at TI-S and TI chapters) as agreed with KPMG. M&E capacity has also been identified as one of the main areas of capacity needs by TI chapters. It is therefore a part of the capacity development budget-lines. The M&E budget-line is used exclusively for hiring external support for these functions. [Please see Annex 7 for the updated M&E Work Plan]

LOGFRAME CHANGES

The main thrust of GTF 085s change in government policy and practice, is captured in the *Purpose Statement*; “More effective anti-corruption policy and practice to address both administrative and grand corruption at the national, regional, municipal and local levels”. In addition to quantitative data, qualitative “stories” will trace the contribution of TI chapter activities and results, to change in government policy and practice. It is very difficult to determine direct attribution at this level, but particularly the qualitative stories will determine what changed, with support from whom, under which circumstances and why.

Outputs

Output/Result 1 is solely focused upon the generation of new knowledge.

Output/Result 3 refers to government receptiveness to new initiatives (knowledge & advocacy efforts) and complaints (ALAC cases + advocacy). The indicators 3.1., 3.2. & 3.4. purposefully measure government engagement, not TI chapter engagement. While 3.3. remains more in the control of the TI chapter and provides an opportunity to describe working relationships and processes of change in a more descriptive manner, especially in circumstances where government cooperation is very limited. Indicator 3.4. has been added concerning the rate of government response to TI chapter enquiries and initiatives. An updated log-frame matrix is attached in Annex 2.

In order to reinforce these indicators, qualitative analysis of change will be extended also to the results level, particularly to Results 2.3. & 4. The qualitative case study analysis will hopefully be strengthened by the utilisation of *Most Significant Change* (MSC) analysis to introduce more structured methodology into the collection and

analysis of these stories. The possibility of applying MSC to coalition partners and to government authorities is therefore being explored.

Indicators

All of the sub-projects report on core indicators (highlighted in red) in the overall log-frame. Others are specific to the ALACs and some are country-specific; notably the indicator referring to media monitoring, as not all TI chapters have the resources to conduct thorough media monitoring. Individual TI chapter log-frames may also contain additional indicators that are collected on the national level and may provide useful information beyond the basic requirements. The core ALAC log-frame is attached in Annex 10 and the two individual log-frames for the evidence-based advocacy projects of the RSI and POLITICS components that have been approved, follow in Annex 11 & 12.

Besides the core ALAC log-frame that has been adopted by all TI chapters, 30 per cent of individual sub-project log-frames have been finalised and approved by RSI/POLITICS TI chapters. In the six other cases, the approval of the log-frame and payment of the 2nd instalment of funds is conditional upon its revision, after up-coming capacity development workshops. This strategy was chosen in order to give greater tools to these TI chapters to complete the logical framework matrix (LFM) and review the global log-frame in a more participatory manner. All of the other log-frames, including the ALAC core log-frame, will also be reviewed at up-coming capacity development workshops. Any changes will be incorporated into the global GTF 085 log-frame.

EMERGING IMPACT ON GOVERNANCE AND TRANSPARENCY

Base-line Survey

In order to understand the potential impact of the GTF on governance and transparency, one must have some understanding of the initial point of comparison. Base-line data on results/outputs 2.1. – 2.3., 3.1. – 3.3. & 4.3. - 4.4. and the new indicator on government response to TI chapter enquiries and initiatives, were collected by a Base-line Survey. All efforts were made to obtain this data in time for the *Annual Report*, in the limited time available. In all, 23 of the 26 TI chapters responded in time, Responses were only missing from Ethiopia, Palestine and Solomon Islands, the latter two did not participate. Palestine will join the programme at a later date and Solomon Islands are currently over-tasked with the preparation of their ALAC. A baseline survey will be sent to Palestine over the next few months as part of the DFID funded TIM ALAC program. Data from these countries will be added later to the relevant tables.

As described in the *Inception Report*, it is not possible to collect base-line data at the purpose level on the ALAC projects, as the scope of possible change is too broad and is wholly demand driven, based on the complaints received by the ALAC. The majority of TI chapters have also not done any related work (legal advice to victims of corruption) previously.

If further indicators are added to the log-frame, where no base-line was obtained at this time, these gaps can always be filled through retro-active interviews of TI chapter staff on the perceived base-line situation at a later date, for example, as a part of the mid-term review.

Results of Base-Line Survey

All TI chapters have some level of cooperation with government authorities; all of the respondents reported at least two working relationships with government authorities in 2008. The average was 7 relationships, the total number 160. Half of the respondents reported that government attended NSA coalition or TI chapter meetings occasionally and that the TI chapter was also occasionally contacted for advice by government. Government also tended to respond to TI chapter enquiries. No TI chapters reported that their correspondence was never answered.

One can therefore conclude that the TI chapters are in line with the general TI policy of constructive engagement with government authorities. The prevalence of “seldom” answers nevertheless demonstrates that there is significant room for improvement. In addition, it must be kept in mind that in some contexts, contacts with government may not even be desirable, as may be the case in Fiji.

TI chapters worked actively in partnership with other Non-State Actors (NSAs) in 2008, averaging approximately 10 partnerships per TI chapter, in a total of 225 partnerships.

The TI chapters also appear to have the capacity to advocate for change, 45 per cent having fully completed advocacy strategies. Half had completed a problem analysis and stakeholder analysis in the process of drafting the advocacy strategy, conducting also a participatory review of the strategy including external stakeholders. Only about 30 per cent relied on external review and/or consultancy support in developing their respective advocacy strategies. 92 distinct advocacy activities had been undertaken in the thematic areas of the respective sub-projects, in 2008, averaging 4 activities/year. 64 distinct proposals for change were made by the TI chapters in 2008, out of which 45 per cent were adopted, at least partially, by the government authorities. 68 per cent of the TI chapters conduct regular media monitoring, with variable methodologies, 55 per cent recording frequent quotations in the press.

The circumstances appear to be conducive to producing significant impact on the level of government policy and practice during the life-time of the programme.

Ongoing sub-projects

On-going projects were in a better position to produce results in the first six months of the programme than new interventions, though individual TI chapters, Pakistan and Zimbabwe have demonstrated significant results in only a few operational months.

GTF 085 is giving support to two existing ALACs in Bosnia and Montenegro. Bosnia began receiving funding from the programme in April 2009.

Montenegro

In Montenegro, the ALAC played a central role in the adoption of a new Law on Conflict of Interest. Here is an excerpt of how the process unfolded:

“On the basis of specific cases of conflict of interest, MANS advocated for adoption of new legislation. MANS participated in each phase of development of the legislation, provided the comments on the draft law that were partially accepted by the government, as well as 29 amendments to the law proposal that were jointly submitted by all opposition parties to the parliament. Moreover, as a part of advocacy campaign MANS organized performance in front of the building of Parliament in which “ministers” begged for the money from MPs and citizens, as according to the official data on their incomes and property, they live on the verge of poverty. After our amendments were refused by the majority, the president of Montenegro returned the Law to the Parliament upon our request. Majority in the Parliament decided to reject the law, but at the same session proposed and adopted another law. The new law is to some degree better than the previous one, however independence of the body which supervises implementation of the law is a matter of concern”. (Annual Report 2009, Montenegro)



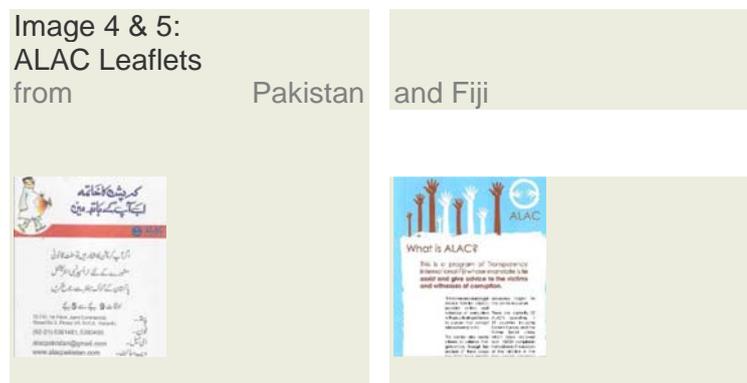
Image 3:

Pictures of Montenegrin “Ministers” panhandling to meet daily costs not covered by reported salaries and property declarations

The ALAC in Montenegro has also made a powerful criticism of the *Instructions on Procedures for Reporting on Criminal Offences*, with elements, such as corruption of the Police, which are not made public. According to the Police Department, thanks to these new procedures, 16 cases of corruption have been reported in a force of 5,000 employees. In the same period, the ALAC has recorded 102 cases of public complaints of corruption in the police force, which clearly demonstrates that the secretive implementation of the new Instructions has not been successful. “Consequently, the Director of the Police Department held a press conference accusing MANS of actions, behavior and activities, whose aim is to harm the State and its citizens”. (Annual Report 2009, Montenegro) Despite urging by the TI Partner, MANS, “no criminal charges were brought against MANS for criminal act of espionage and harming the interests of state”. (Annual Report 2009, Montenegro)

New sub-projects

The launch of the ALAC is already a signal of the potential for greater government accountability. Eleven out of 16 planned ALACs have been successfully launched and are now open to the public.² Due to the fact that the majority of the ALACs did not open to the public prior to 31 March, 2009, it is not possible to gather and share comparable data on contacts and cases brought to the ALAC at this time. Needless to say, in the short time the ALACs have been open, Zimbabwe has received 312 contacts. In Rwanda, the ALAC has received 62 complaints and established two concrete cases. Ghana has received nine complaints. Liberia received 8 contacts of which 6 developed into new cases.



Generally, governments have welcomed the opening of the ALACs, with most openings attended, if not opened by representatives from the anti-corruption authorities. Openings were also attended by the donor community. Overall, the ALACs have been welcomed and formal MOUs have been signed in a majority of cases. However, the signature of MOUs should not be taken as a significant indicator of working relations, due to the “paper tiger” effect. In a number of political contexts, there are good working relations between the TI chapter/ALAC and the government authorities, but no Memorandum of Understanding (MOU) has been signed, or it has not been possible, (Nepal) or even desirable (Fiji).

² Africa: 4/5, APC. 4/6, AME: 1/3, ECA: 2/2

Image 6 - 10: ALAC Launches in Ghana, Pakistan, Nepal, Rwanda & Vanuatu



As an example of the importance of the ALAC as a supplement to the existing complaints mechanisms, in Liberia, only the General Auditing Commission (GAC) has a formal complaints mechanism through its website. The ALAC, only with its presence, will already be an enormous step in offering public recourse to accountability and justice, simply by offering its services.

Pakistan

While working in a difficult political environment, Pakistan has already achieved significant results in its attempts to establish contacts with the authorities. The Minister of Law and Justice has pledged his personal support to the ALAC via telephone. The Chief Justice of the Supreme Court, Mr. Iftikhar Muhammad Chaudry, was contacted in writing, along with the Chief Justices of the High Courts in Pakistan. Subsequently, the Chief Justice has issued directives that a complaint cell should be opened in the Supreme Court and all the High Courts to receive complaints of corruption against the judiciary.

Zimbabwe

In Zimbabwe, the ALAC opened its doors to the public on 1 April, 2009. In the first two months of operations, the ALAC has received 312 complaints; an unprecedented amount for a new ALAC. As a part of its advocacy strategy, the ALAC is producing monthly ALAC updates that are shared with the media. The May update analysed the profile of the complaints, drawing attention to corruption in property rights, private sector (especially procurement), public sector procurement, police, judiciary, education, health and political parties. Particularly the fact that 38 per cent of the complaints were related to the police and the mention of the judiciary were vehemently challenged by the Attorney General in the press, who questioned the authority of the ALAC to investigate corruption. The ALAC has forwarded some of the suspected cases to the relevant authorities for further investigation. The conscious strategy of frequent media updates is aimed at 1) fostering a culture among the Zimbabwean public to demand accountability from the leadership, as well as public and private service providers 2) mitigating the risk of government retaliation through broad visibility. (See Attachment 2 for ALAC update and Attachment 3 for article in ZimOnline) The unprecedented number of cases points to

the willingness and ability of citizens to engage in the fight against corruption, despite the difficult political circumstances and endemic levels of corruption. The advocacy efforts by the ALAC at this early stage also point to significant energy to demand for change in a number of areas, including the judiciary and police, but also the broad area of public and private procurement.

Considering the little time and limited budget that has been expended to date, the results demonstrate significant value for money.

CROSS-CUTTING ISSUES

Cross-cutting issues are particularly central to the ALAC. Contacts and cases are disaggregated by gender. Data on a number of other variables is also collected via the database, notably on gender, age, urban/rural, education level, profession, single-parent, disability, refugee status and poverty. However, it is extremely difficult to assess economic standing and poverty level in the client survey and means of tracking this important variable will need further development; most likely by monitoring the outreach activities of ALACs to less privileged parts of the country. The focus has been on reporting the gender breakdown on clients. Notably, Zimbabwe has already noted that few women contact the ALAC.

Advocacy and communication strategies have been tailored to the needs of target groups, notably to the economic means, literacy levels, age, gender and location. Information campaigns have been run on appropriate media (radio, community-outreach), in vernacular languages. (Liberia, Fiji, Vanuatu) Many have also opted to run television advertisements, despite the expense involved, due to the popularity and outreach of the medium. ALACs have been encouraged to also consider alternative media, such as community drama, to convey their message.

Image 11 & 12: Anti-corruption education through performance



Many of the coalition partnerships forged by the TI chapters are with groups representing the disadvantaged. For example, in Pakistan, most of the organisations contacted for collaboration with the ALAC involved women and children.

PROGRESS TOWARDS SUSTAINABILITY (YEAR 2 ONWARDS)

The capacity of individual TI chapters is very variable. For example, in the case of Kenya, GTF 085 accounts for only approximately 2% of their annual budget. While in the Solomon Islands the programme is a formative part of the establishment of the TI chapter on the island. TI-S is providing governance, managerial and technical support to the TI chapters, which is channelled through both regional and thematic departments. There is a great emphasis on South-South cooperation and learning.

INNOVATION

ALACs

The ALACS are a relatively recent initiative by TI. Started in 2003 by three TI chapters – Bosnia and Herzegovina, FYR Macedonia and Romania – ALACs have proven a powerful tool in the fight against corruption. At the end of 2008 there were 32 ALACs operating in 23 countries. The principle basis of ALACs is the empowerment of citizens and the rejection of the notion that people are apathetic in the face of corruption. Rather, they demonstrate that individuals will become involved in the fight against corruption when they are provided with simple, credible and viable mechanisms for doing so. The fight against corruption is more effective when citizens are involved, rather than this being limited to “experts”. In order to bring the issue to scale, considering the magnitude of corruption in the world, it is essential to engage as many citizens as possible. ALACs provide a far deeper and richer understanding as to how corruption works in practice; information and knowledge which is not always available from research and surveys. Individual cases have highlighted systemic problems about which people and governments were not aware. Finally, advocacy campaigns are more legitimate and effective when they are based on the real experiences of people.

After eight years of experience in Central and Eastern Europe and the former Soviet Union, GTF 085 is expanding the concept to all regions of the world. New ALACs will be established in 14 new countries in Africa, Latin America and Asia, as well as continuing operations in two Balkan countries.

Evidence-based Advocacy

In addition to the new ALAC approach, GTF 085 is also funding the continuation of more traditional TI-S and TI chapter led initiatives, based on the continuous development of new research tools - their practical application - and the implementation of the evidence generated in advocacy campaigns; evidence-based advocacy.

UNCAC Compliance Review/Gap Analysis

It is key to monitor government implementation of the UN Convention against Corruption (UNCAC) in order to help maintain political will, provide expert inputs and ensure public awareness of the state of play. Even if an effective UNCAC

intergovernmental review mechanism is established, it will take many years to monitor all countries in all subject areas covered by the UNCAC. Thus, CSOs have a central role to play in conducting independent monitoring. To support this kind of CSO work, TI has undertaken to develop a manual for CSOs interested in carrying out UNCAC monitoring.

The manual was due to be completed in March 2009 and final revisions to the main body of the report are close to complete. However, a key component of the manual, the indicators, is still missing. While these were originally part of the consultant's TORs, it proved much more time-consuming than expected for the consultant to produce the actual framework text. Moreover, it became clear that the development of the indicators would require far more time than originally envisaged for the consultant. Consequently, TI agreed to accept the manual without the indicators and with that, face a significant setback in the timing for the completion of the manual with indicators. Armenia and Georgia have also been selected as pilot countries for the implementation of the Compliance Review, though this component has now been delayed due to the problems described above.

NIS

The overall NIS approach was reviewed in 2007 as part of an effort, supported strongly by TI chapters, to create a quantifiable element that could accompany the studies. TI accordingly developed a scoring system for implementation in 2008. The new National Integrity System (NIS) will be rolled-out with the participation of three GTF 085 countries - Armenia, Georgia and Ethiopia. A workshop is due to be held on 27-29 July, 2009, for the identified researchers and Project Coordinators from the TI chapters, in order to introduce them to the NIS methodology and the management of the GTF 085 programme.

RSI/POLITICS in Latin America

The TI chapters in Latin America are pioneering various new methodologies. TI Venezuela has identified its research team, begun to develop the required methodology and software, and identified pilot municipalities where it will implement its pioneering work on municipal transparency over the life-time of the programme. There are already plans to replicate this work in the rest of the region.

Overall, the GTF 085 provides enormous opportunities to compare the effectiveness and impact of more traditional TI evidence-based advocacy, with innovations such as the ALACs. In addition, it should allow TI to compare the benefits of TI-S led initiatives, with those restricted to individual countries and/or regions.

LEARNING FROM GTF

Financial Management

The overall DFID/KPMG rules on financial reporting have changed throughout the life of GTF 085. For example, while originally no budget template was provided, one has now been suggested as a part of the comments to the Inception Report. The procedure for requesting advances and related forms have also been altered in the

course of implementation. While initially functioning on a strict quarterly schedule, a 30-day rule now applies. Quarterly requests carry a significant administrative burden, and impose a further challenge in fluctuating foreign currency markets.

GTF 085 has retained the original approved budget format, as it forms the basis of its whole financial reporting system. The strict quarterly schedule with TI chapters is in order to avoid slippage and under-spending; also to avoid yet new formats.

Global Budget

The lack of a budget template allowed for welcome flexibility. However, there is a lack of clarity when the contractual budget is limited to the DFID contribution, not the complete project costs, while deliverables are based on full costs. The lack of a contractual obligation to ensure that additional project funds are committed to meet the needs of the project activities could potentially affect results. GTF 085 will begin significant fund-raising efforts by end of 2009, though these efforts will be significantly affected by the financial crisis.

Audits

The reporting deadline is based on the individual organisations fiscal year, which is reasonable in terms of the submission of annual financial statements. However, this does not account for the differences to the British fiscal year - on which the project timeline is based - nor does it account for the differences in revenue recognition policies. In many instances, funding advanced to partners is not recognised as income until the accounting for these monies is received. This would pose a problem if DFID is only considering recognised income as money spent.

GTF 085 has introduced project-specific audits to provide reasonable assurance of expenditure. The alternative would be supporting documentation verification, which is not possible given the size of the project. There will always be a difference between the figures and timing of these project-specific TI chapter audits and the TI-S audit, which is the accountability mechanism referred to in the Grant Agreement.

In addition, differing audit standards, as well as differing global accounting standards have proved a challenge. GTF 085 will provide more guidance on audit requirements as auditor interpretations did not meet TI expectations in many instances.

Under spending

The under spend of GTF 085 can be attributed to delays in the start of the programme. Any additional under spend in the ALAC component is due to recruitment delays and lack of full understanding over the significance of the British fiscal year and the difficulties in carrying - over funds from one year to another.

Carryover

The threat of losing any carry-over in funds has been significant and GTF 085 has operated on the assumption that no carry-over will be allowed, unless approved by KPMG/DFID. It was not in the interest of the results of GTF 085 to spend indiscriminately to extinguish the budget at the end of the fiscal year and hopes lie with a carry-over of the funds.

Capacity

One should not prejudge the capacity of local partners, even when they are one's own partners. Even if TI chapters have successfully fought corruption over a number of years, this does not automatically entail capacity to meet the demands of a donor funded, multi-country programme - with serious demands on both results and financial management. Particularly applying log-frame methodology has proven much more difficult than initially envisaged. All the planned capacity development work should have been more front-loaded into Year one. Financial management has been a particular focus at workshops and in day-to-day support to TI chapter on reporting. This has already enhanced the capacity of the TI chapters involved, with benefits for the running of GTF 085 and other TI chapter project activities.

Lack of HR and other resources

Delays in recruitment and difficulties in identifying qualified personnel have plagued many of the TI chapters. The Pacific Islands have been creative and active in using the Australian Volunteers International (AVI) to fill this gap. Vanuatu is due to hire the first AVI with legal expertise in September 2009. In certain country contexts, identification of office space (PNG), provision of sizeable rental advances (Liberia, Nigeria) and problems with IT and communications (PNG, Nigeria) have been significant.

Audience: GTF Management, Development practitioners working in multiple regions of the world

Lessons about adapting your methods and approaches

Contextual Adaptation

The ALAC concept has proven very attractive to TI chapters and adaptable to various different circumstances. However, in the roll-out of the concept beyond Central and Eastern Europe and the former Soviet Union countries, one must be particularly conscious not to apply it as a "cookie cutter", but rather to adapt the core concept to local circumstances. This may mean that in Zimbabwe, one is able to process cases and forward them to the correct authorities to be processed in accordance with their mandate. While in Nigeria, the ALAC may initially operate largely as an information centre, rather than processing individual cases; this all due to the political window of opportunity in Zimbabwe.

Political Windows of Opportunity

The case of to another critical lesson: that of political windows of opportunity. Clearly the TI chapter and ALAC have been able to utilise the opportunity provided by the coalition government to advance its agenda, without intervention for the moment. Similarly, TI Pakistan and ALAC have been able to take advantage of the restoration of the Chief Justice of the Supreme Court, to garner the full support of the Justice Sector for the ALAC, already instituting significant reforms; the opening of complaints cells in the high courts.

Favourable political conditions have also played a major role, as the opportunity provided in Ghana after the recent election result, as well as the anti-corruption efforts by the government of Rwanda. Even if commitment to the fight against corruption may be more words than deeds, government authorities may be caught in their own rhetoric, as suggested by the ZimOnline article in the case of the Attorney General of Zimbabwe. (See Attachment 3)

Legal Framework

The legal framework is also important. In countries with Whistleblower Protection and Access to Information legislation, the work of the ALACs is significantly facilitated. In Paraguay, while access to information is constitutionally guaranteed, the absence of related legislation hinders the pursuit of corruption cases with the authorities. Notable, this legislation is often in place in the countries of established ALACs and much less so in the new context of the GTF 085.

Information Technology

TI chapters have been particularly receptive to the use of new IT tools in the inception of GTF 085, whether teleconferencing via Skype and software applications that allow live sharing of documents, presentations and even virtual training that are full of possibilities for a global Movement.

Audience: Legal advice and good governance professionals working in developing countries, notably Ghana, Pakistan, Rwanda, Nigeria, Vanuatu, Zimbabwe



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