

ODS GREATER IMPACT

MID-TERM REVIEW OF TRANSPARENCY INTERNATIONAL'S MOVEMENT STRATEGY 2020

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WOUTER DE IONGH, ODS
ANNA CESARI, ODS
KAAT BOON, ODS
ALAN AL YUSSEF, ODS

39, Rue Ducale | 1000 Brussels, Belgium
www.odsupport.eu | info@odsupport.eu |



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I. INTRODUCTION

Transparency International is a complex movement, going through complicated changes, working on a complex set of issues in an ever more complex and complicated world. This means that conducting a mid-term review at this point is a complex affair as well. Since this is the Mid-term Review of TI's *Movement Strategy 2020*, the reviewers have aimed to do justice to the Movement's diversity, its history and its organisational and intellectual resources. This is not only to be inclusive but also because the aim of the review is to find ways forward for the Movement to use these unique resources in the best possible way to achieve TI's mission.

TI's Strategy 2020

The priorities, goals and activities as outlined in the Strategy 2020 are summarised in the table below. A full table including activities is attached in Annex III.

Strategic Priorities	Change
PRIORITY 1: PEOPLE AND PARTNERS	
a. Create demand for accountability and empowering action	People around the world denounce corruption and take increased action to confront it by demanding transparency, accountability and integrity
b. Engaging partners and inspiring leaders	Growing number of key partners and leaders drive anti-corruption progress
c. Protecting anti-corruption activists	Greater freedom of action and voice for anti-corruption activists
PRIORITY 2: PREVENTION, ENFORCEMENT AND JUSTICE	
a. Promoting prevention and enforcing anti-corruption standards	Public and private institutions implement the highest transparency, accountability and integrity standards to prevent and confront corruption
b. Achieving Justice: ending impunity for corruption	The corrupt are increasingly being held to account and punished
PRIORITY 3: A STRONGER MOVEMENT	
a. Sharing what works against corruption	An increased body of knowledge of the interventions to stop corruption is readily available, focusing on what has worked and enabling the sharing of expertise
b. Building a sustainable movement	The Transparency International Movement is professional, sustainable and leads by example
c. Ensuring the relevance of the Movement	Transparency International serves as the point of reference on corruption issues in key countries, notably the G20 countries, BRICs and MINTs

ToR objectives

This review looks at what has been done towards the implementation of the strategy and analyses why some priorities were more successfully pursued than others. Specifically, the review aims to achieve the objectives outlined in the Terms of Reference, as interpreted in the project plan. These are:

1. *Understanding the relevance of the strategy given the (changing) contexts in which TI operates;*
2. *Providing an overview of the extent and effectiveness of implementation of the Strategy by the Movement;*
3. *Assessing the role of TI-S in the implementation of the Strategy.*

These lead to recommendations & conclusions for the rest of the strategic period as well as for the development of the next strategy post 2020.

Thank you

Throughout this complex review, the reviewers received full support from staff in TI-S' Strategy & Impact Team, on organising the data collection and communicating about the review towards the Movement. We would also like to thank the more than 130 people we spoke with in an interview or focus group, who were willing without exception to answer our questions and think constructively about the future of TI's Strategy 2020. Finally, we would especially extend our gratitude to the two TI Chapters - the Ghana Integrity Initiative and Participacion Ciudadana in the Dominican Republic - who were willing and able to receive us on very short notice. Visiting these two Chapters was invaluable in fostering our understanding of the Movement, and the way different strategic priorities are implemented in different contexts.

Glossary

ALAC	Advocacy and Legal Advice Centres	GII	Ghana Integrity Initiative
AMM	Annual Membership Meeting	M&E	Monitoring and Evaluation
BOT	Beneficial Ownership Transparency	MENA	Middle East and North Africa
BICA	Business Integrity Country Agendas	MTR	Mid- Term Review
BRICS	Brazil, Russia, India China, South Africa	NGOs	Non- Governmental Organisations
CPI	Corruption Perception Index	NIS	National Integrity System
CSOs	Civil Society Organisations	TI-S	Transparency International Secretariat
ED	Executive Director	TRAC	Transparency in Corporate Reporting
GC	Global Council	UNCAC	UN Convention Against Corruption
GCB	Global Corruption Barometer	WEF	World Economic Forum



II. CONTEXT & ASSUMPTIONS INFORMING THE STRATEGY

In this chapter, we consider the context in which the Strategy was drafted, what has happened since and how this has impacted the relevance of the Strategy.

Context informing the strategy

Having discussed the development of the strategy with several of those involved in both the 2020 and 2015 strategy processes, and taking note of the documentation on the development of the 2020 Strategy, a number of assumptions that underpin the strategy have emerged. These shared assumptions included: that social movements are important in fighting corruption, that more activism is needed for the same reason and that corruption is facilitated by the increasing interconnectedness of the global economy. These assumptions were not challenged by the informants of this review.

The importance of social movements, or at least the connection to local and regional civic actors, has been on the agenda of CSOs and international fora for many years. What was specific for the period in which the 2020 Strategy was being developed was a shared belief that these social movements could be successful in challenging entrenched interests, following experiences in the MENA region, Ukraine and many other countries where corruption sparked a number of these movements. Among TI's leadership at the time, there was a belief that TI should support those and use their energy to achieve its own goals. As those active in these movements would also be exposed to threats, being part of a global movement such as TI could help mitigate these threats.

According to those involved in its development interviewed for this review, the notion that more activism was needed was based on the assessment that the global policy discourse on corruption had matured and that TI should evolve along with it, moving beyond merely having a seat at the table towards exposing cases of corruption. This aligned with the third trend that we identified from both the interviews with (former) Board Members and the literature review, namely that global economic, technological, political and financial ties have become so close that it is becoming increasingly important to understand them and make those connections visible and known to the public.

There are also a number of underlying assumptions that do not appear to have been challenged in a structured and movement-wide manner during the development of the strategy or since¹. One is the connection between a liberal economic view and the liberal democratic values on which TI's core concepts rest. This view, present throughout TI's history, assumes that through international systems and legal frameworks, progress would be made, and that liberal democratic values would facilitate liberal economies, and vice versa. However, it is questionable whether liberal economies do lead to liberal political systems, and lead to reduced corruption. Many scholars and practitioners in the economic field argue that free market fundamentalism - as the most extreme form of economic liberalism - inevitably leads to inequality, not merely in an economic sense but also in the impact it has on democratic processes, and therefore on access to policy

¹ With notable exceptions by some in the movement, see for example: <https://voices.transparency.org/why-are-anti-corruption-success-stories-still-the-exception-9a30e5f4cf39>

decisions and on the quality of governance systems. This in turn begs the question whether free market fundamentalism is merely an excess of the political and economic model, or a feature of it.²

A complicating factor is that TI still uses the 'entrusted power'³ definition in its core concepts but that in practice the work is more about power relationships. Power needs to be held in check to ensure that no de facto corruption exists, and any power not kept in check - whether entrusted or hidden - will inevitably corrupt. In addition there seems to be a fundamental flaw in the system if this economic system leads to excessive inequality, accumulation of power and influence on the legislative processes that TI tries to influence. This leads to an unevenly small number of actors dominating the political system, which includes determining the definition of corruption itself. Whether this analysis is sound is up for debate but that a broad discussion around the limits of our current systems is taking place in academia and civil society, has become clear from the context analysis. As a Global Movement, it is crucial that TI is at the forefront of this discussion by continuously trying to innovate what it considers to be good governance, corruption and transparency.

Context since the development of the strategy document

The challenge to the basic world view on which TI's work has relied is further aggravated if liberal political systems are disappearing, under threat, or delegitimised, as has been the case since the development of the 2020 Strategy in 2014/2015. Since then, the coinciding and mutually reinforcing trends of the emergence of illiberal regimes or tendencies on the one hand, and the rise of populist rhetoric which actively tries to undermine liberal democratic values, have increased the sense among the public that the liberal world order is under threat. Even if the actual decline in that order is not as steep, or reversible, the perception of decline needs to be taken into account when engaging the public or policy makers. Within the Movement, Chapters working in different cultures and (political) contexts also indicate that there are limits to the relevance of definitions of corruption and transparency as defined globally, and that there are negative effects of the actual global governance system in their countries. Whereas the development of global norms to combat corruption has been an important step forward, and in many cases helps Chapters to engage with their governments or the private sector, the next step would be to further adjust the notions of corruption, transparency and good governance, to curtail some of the negative effects of the current status quo.

At the same time, in many countries national institutional anti-corruption work is progressing and TI Chapters as well as TI-S are instrumental in moving these processes along. Many Chapters have also highlighted that anti-corruption messages and campaigns as well as the willingness of the public to hold their duty-bearers to account, are all increasing. This leads to significant opportunities for the Movement and validates the inclusion of Priority 1 in the Strategy. There is a risk to this increase as well, as the pretext of corruption is frequently used to challenge political adversaries, or when ways are found to draft legislation that essentially legalises corruption.

The increasing availability of data, either through building up databases as in the implementation of Advocacy and Legal Advice Centres (ALACs), or through leaks and whistleblowers, presents an opportunity which TI

² Katarzyna, E. (2018). [That Vision Thing: Anti-Corruption Research for a Future Beyond Neoliberalism](#), ECPR General Conference, University of Hamburg, 22- 25 August 2018.; Ochonu, M.E. (2016). [Bring back corruption: A critique of neoliberal anti-corruption rhetoric](#), Pambazuka News.; Lazzarato, M. (2009). Neoliberalism in action: Inequality, insecurity and the reconstitution of the social. *Theory, culture & society*, 26(6), 109-133.; Navarro, V. (2007). Neoliberalism as a class ideology; or, the political causes of the growth of inequalities. *International Journal of Health Services*, 37(1), 47-62.

³ "Corruption is the abuse of entrusted power for private gain. It can be classified as grand, petty and political, depending on the amounts of money lost and the sector where it occurs."

has understood well. At the same time, there are issues connected to the availability of data that pose serious risks. These include the balance between transparency and privacy; the legality and useability of data obtained this way; questions on ownership of information and data; and power imbalance between large corporations and states on the one hand, and the public and civil society on the other hand (the threat being that the use of transparency or more precisely, the availability of information, can and is being used to cloud understanding or hide certain practices). Especially for smaller Chapters or in countries where technological expertise or infrastructure is not as widely available, the Movement will need to respond.

Strategic Shifts in the Strategy 2020

From the review, two main strategic shifts emerged that were envisioned with the strategy:

- A. **Becoming more activist and vocal.** This shift was ingrained in both content priorities (1 and 2) and encompassed two areas in which TI was to become more vocal:
 - i. Fighting impunity
 - ii. An increased focus on Grand Corruption
- B. **Harnessing the energy of grassroots movements and actors.** This shift was mostly covered by priority 1 but elements of it were included in the Strong Movement priority as well.

A number of secondary shifts were included in the strategy to either support the main shifts or mitigate risks associated with them:

- A focus on financial markets and global financial flows, including money in politics;
- Protecting activists and the space for civil society;
- Monitoring impact & understanding what works in fighting corruption;
- Several other organisational shifts under 'A Strong Movement': collective fundraising, focus countries (G20, BRICS, etc.) and leadership development, among others.

According to a significant number of interviewees, an analysis of the context informed these strategic shifts but individual expertise and personal preferences of those involved in shaping it at Board level, played a pivotal role as well. The TI Board at that time used its political mandate deliberately to move TI in a different direction it felt was both necessary and in line with the Movement's wishes. The strategic shift to become more vocal (A) has been cause for significant debate within TI, starting under the previous Board and continuing until today as we have found in the interviews and focus groups. Multiple Chapter representatives as well as former Board Members were either convinced that this shift was a move away from the core identity of TI as being collaborative and diplomatic, or acknowledged that there has been a substantial amount of pushback against this strategic shift. This was corroborated by remarks from staff at TI-S on what they had heard from their Chapter counterparts.

Relevance of the Strategy

The issue can be seen as three-layered. Firstly, the shift is understood differently by different people. The stated intention was to add a focus on actual cases as well as more activism to the mix of approaches but this was interpreted as moving away from the collaborative identity many thought had served TI well over the

years. Whether this was indeed the Board's intention is difficult to establish in hindsight, but currently the review found nobody in the Movement who argues for moving completely away from these origins. There are some who argue that TI should return to those roots and negate the shift towards more activism, but this is a small minority of Chapters and (former) Board Members. It is clear however, that for many in the Movement, the extent of this shift and the thinking behind it, was neither communicated clearly or well understood.

The second layer concerned the enthusiastic but narrow interpretation of this shift by some in TI's leadership. The Unmask the Corrupt campaign was seen by many interviewees as the way in which this shift was implemented, even though the campaign was only one initiative out of many throughout the Movement. The focus on a global campaign also clouded Chapters' understanding of what they could or should do to implement this shift nationally. Furthermore, the TI Board also took it upon themselves to adopt a more activist approach at the global policy level but in some cases even nationally (or with national implications), without sufficient involvement of or attention to the implicated Chapters and their interests. This was seen by multiple interviewees as an imposition of this strategic shift where it was not the appropriate approach.

The third layer is a different view on the nature of TI and what its values are present in the Movement. This was not broadly identified as an underlying cause by interviewees themselves but the reviewers find that there are two broad views expressed in these interviews and focus groups: a more progressive, community based view on the one hand, and a more institutional, liberal view on the other hand. This is not a well developed debate within TI nor has it been expressed by all interlocutors in the same way. In light of changes in the global and national political and societal contexts, such a debate could have taken place but this did not happen during the development of the Strategy or since.

As such, two opposing views have emerged on the 2020 strategy which cut across roles, locations and interests. On the one hand, a much needed movement towards a more activist approach, which should in their view be continued. Others feel strongly that a sort of betrayal of the core values and identity of TI has taken place during the current strategic cycle, which they think needs to be corrected. Both views, according to the review team, seem to be incomplete and to offer a distorted view of the strategy and its implementation. As the acknowledgement of levels of maturity of global policy processes as well as of TI as a Movement, and as additional ways in which TI can combat corruption, the strategic objectives and shifts are highly relevant for the Movement. Individual Chapters might not think these shifts are relevant at this time for their situation, but that could change and these certainly are important additional tools for the Movement as a whole.

The more important substantive question that TI needs to answer is to which extent it should choose sides in global political discussions between those who think the economic and political liberalism are intertwined and those who think that the excesses of economic liberalism are threatening the political liberalism which underpins much of the work on good governance, transparency and anti-corruption. The reviewers think a choice for the first option is untenable or at least contains a high risk as that liberal world order is being threatened both from the 'right' by autocratic regimes and from the 'left' by social movements and disillusioned young people who came of age after the crisis.



III. EFFECTIVENESS IN IMPLEMENTATION

In this Chapter, we summarise the data collected on the implementation of the Strategy. Our findings draw on the desk review⁴, as well as the qualitative contributions through the interviews and other methods. Under each Priority as outlined in the Strategy, we identify what the Movement - Chapters, TI-S and combinations thereof - set out to do under the strategy and what we know of the extent to which they have succeeded. We have selected one or two Case Studies under each Priority, to further explore the impact achieved through certain initiatives, approaches or focal areas under the Strategy. A full list of countries, strategies and projects reviewed, can be found in Annex V.

Priority 1: People & Partners

Under Priority 1 'People and partners', the three main goals are: creating demand for accountability and empowering action; engaging partners and inspiring leaders; and protecting anti-corruption activists. These stipulate work with different types of stakeholders: **people** who denounce corruption and take increased action to confront it, **partners** in the public and private sectors who intend to drive anti-corruption progress, and **anti corruption activists** who gain more freedom to act and protection against (potential) threats. The priority points to the awareness in TI that in order to achieve the changes envisioned and make that change sustainable, citizens need to demand transparency, accountability and compliance with laws and regulations. Where in the past policy change was identified as the main goal and indicator of change, working with local communities to create public pressure has become more central under this strategy.

Priority 1a. Create demand for accountability and empowering action

The envisioned change under this priority is that '*people around the world denounce corruption and take increased action to confront it, by demanding transparency, accountability, and integrity*'. The intention was that the Movement should reach out to specific groups of people to be defined at country level, with a particular mention of: young people, women and activists.

Our review showed positive contributions and a large engagement with young people at chapter level, while less has been achieved in terms of engaging women and activists. Looking at Chapter strategies, some have a clear stated focus on working with young people and networks, aimed at raising youth awareness of corruption issues⁵ or at supporting anti-corruption youth networks⁶. Women are specifically identified as a specific target audience in the strategies of only a few Chapters⁷. This points to the limited strategic attention to gender in the Movement as a whole, even if specific projects or people may include it in their day-to-day work and considerations.

Regarding cooperation with activists, the strategy does not indicate what the more specific outcomes of the desired change should be. Almost every Chapter engaged or reviewed had dealings with activists in one way or another but this is not necessarily different from before the Strategy 2020. In many cases Chapters -

⁴ Including a sample of 45 Chapter strategies, Chapter data gathered by TI-S through a survey from November 2015 on how national strategies align with the Movement Strategy, an document with Global Projects run by TI-S and discussion with the TI-S team.

⁵ Including Vietnam, Malaysia, Armenia, Cambodia, Russia, Haiti and Korea

⁶ In Lebanon and Palestine for example

⁷ Jordan, Nigeria, Zambia, Ghana being examples from the review - out of over 50 reviewed

including Ghana - strengthened the capacity of activists, in others such as in Armenia, TI provided legal knowledge to activists, and in Palestine, the Chapter offers support services such as an online discussion forum. In Dominican Republic, Participacion Ciudadana works closely with representatives of La Marcha Verde⁸. In addition to helping the activists with their communications, the Chapter is supporting them in identifying what realistic priorities they could formulate. The Chapter is able to suggest a more focused approach, rooted in their knowledge of the underlying concepts and international policy processes surrounding corruption. This has the potential to help the activists consolidate their progress, continue their momentum and maintain their credibility among the general public. A comparison of Chapters points to a greater focus on working directly with activists in several countries in South America and Europe, while in Asia the Chapters included in the review leaned more towards capacity building and networking.

The support provided to those who experienced corruption first hand by enabling them to denounce it, has been mainly achieved through the work of the ALACs⁹. However, our review showed that support has been given through other channels as well. For instance, TI Pakistan ran a project in which it established an Anti-Fraud hotline aimed at assisting citizens to report fraud and abuse in USAID funded projects.

Journalists are a natural ally for much of the work of the Movement and collaborations happen everywhere. In this case, the forms this cooperation can take are clearly defined in the strategy and we have seen that different types of actions have taken place within the Movement. For example TI EU and TI Belgium established a series of online tools to harmonise data which allows the integrity of EU policy decisions to be monitored. It also supports cross-border collaboration of investigative journalists working on corruption cases. Another example is the project Media for Transparent and Accountable Governance (M-TAG), in which TI Georgia worked with journalists to advocate for media independence. Broadly speaking, the collaboration with journalists happens in two ways, depending on the context: in some cases information is shared for others to work on such as in TI France or GII, whereas in other cases Chapters worked together with journalists or activists to expose cases of corruption, including Participacion Ciudadana.

Priority 1 b. Engaging partners and inspiring leaders: Growing number of key partners and leaders drive anti-corruption progress

Working with other NGOs and establishing partnerships is a key enabler of TI's work, and certainly for the Chapters, therefore almost all Chapters that contributed to the review or whose strategies have been reviewed indicated priority 1b as an area of work. But establishing partnership is included in the Strategy as a goal in itself as well, not merely as a means to achieve other objectives. From the limited data from the survey, combined with the qualitative information from the interviews, it seems that wherever a shrinking space for civil society is identified, creating sustainable partnerships is indeed interpreted as a goal in itself. This is not the case throughout the whole Movement however, as a significant number of Chapter interviewees see partnerships merely as instrumental to achieve other objectives. Therefore, what the nature is of the partnerships the Strategy refers to, and what is the expected role of TI in such partnerships, should be clarified in order for this priority to be measurable.

⁸ Social Movement initiated after the Odebrecht scandal. People gathered together and manifested asking Government representatives to take concrete action against corruption and ending impunity

⁹ See ALAC Case Study in Annex I

Chapters have established effective relationships with leaders in the private and public sector but we have not seen instances of existing leaders or public figures becoming anti-corruption champions, as the strategy ambition states. Concerning making links with the human rights system, some Chapters have mentioned that for instances of petty corruption, infringement on basic rights is obvious but that the connection between Grand Corruption and human rights needs to be made more explicitly. Among those engaged in advocacy for the Movement at global level, there were differences in the extent to which they thought corruption should be seen as a human rights violation and if so, under which articles of the Universal Declaration on Human Rights. Chapters and TI-S partner frequently with human rights NGOs however, and in Ghana, the government commission combating corruption is housed in a combined agency with the human rights commission, so links to the Human Rights community are there.

Priority 1c. Protecting anti-corruption activists: Greater freedom of action and voice for anti-corruption activists

The protection of anti corruption activists (1c) is context-dependent and not equally relevant to all Chapters. In those chapters where action is most needed, we found different forms of engagement with anti-corruption activists. In Ukraine, for instance, attacks on anti-corruption activists and journalists exposing corruption continued throughout 2017 and the TI chapter is actively supporting these activists by facilitating their collaboration in a CSO network. This effort is supported by an online platform where 130 activists regularly gather and will continue at least until the upcoming presidential elections, as TI Ukraine expects the pressure on activists to increase again. Chapters feel there is a compelling need to strengthen the legal framework in protecting whistleblowers in both public and private sector and many Chapters - such as TI Latvia and TI Greece - are involved in advocating for the approval or modification of a whistleblowers protection legislation. Contacts with whistleblowers and anti corruption activists are also maintained and further developed through the ALACs. For instance, in Lebanon the work of LALAC contributed to systemic change by building constructive engagement with public institutions and decision-makers, and this created a conducive environment which made it possible to start advocacy for whistleblower protection.

The overall approach of TI, working in partnerships and to constantly raise awareness in society is also conducive to a safer environment for anti-corruption activists and whistleblowers to operate. This priority also seeks to tackle the issue of the shrinking space for civil society organisations to operate freely. The approach outlined in the strategy - to establish networks and to coordinate actions between CSOs - is relevant and effective and tackles the issue on a structural level. Chapters also have numerous initiatives in place intended to facilitate exchanges and make civil society more resilient. This is done in programmes such as ALIAR (Learning and Leadership for Incidence) implemented by TI Argentina to strengthen civil society institutions. The Anti-Corruption observatory established in Morocco aims to receive, promote and disseminate quality information on corruption and governance to facilitate CSOs and citizens' advocacy. Other Chapters, including GII, use network building more as a principle integrated in all their approaches.

The SAFE unit at TI-S provides another way in which the security of activists is improved and interviewees that benefited from trainings done by the SAFE unit or who obtained advice, acknowledged the relevance of those interventions. At the same time they recognised that the resources for this work are limited in relation to the size and complexity of the whole Movement.

Effectiveness of the Movement in implementing Priority 1

This priority fell naturally into the work of TI, as it already had a strong record of establishing partnership at national, regional and global level. All Chapters engaged in this review almost automatically incorporated this priority in their national strategies or programmes. However, it is important to understand that the work with people and partners is now engrained in the goals under this priority as a goal in itself and no longer merely as the means to achieve other aims. What Chapters are missing is guidance on what they could practically do to achieve the goals under Priority 1 and clarifications on the definitions in some of the outcomes. In the design and implementation of projects, more attention to methodologies on how to mobilise people or concrete overviews of good practices that proved to work in relevant other contexts, would help the Chapters.

Figure 1: In the course of the MTR, the reviewers compiled three different samples through which the work on programmes in Chapters and at TI-S was assessed: a review of Chapter strategies, two spreadsheets with an overview of Chapter and TI-S projects, and qualitative information on programmes collected through the survey, roundtables and interviews. The figure below, aggregates that data to show which countries out of a total of 55 work on a sub-priority linked to Priority 1 “People and Partners”. This very rough assessment was the only way the reviewers were able to quantify the data in the absence of a complete dataset on programme progress throughout the Movement. The qualitative data was used for the analysis as well.

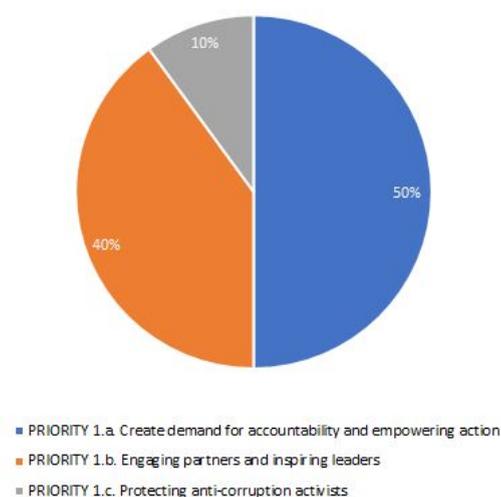


Table 1: Summary of effectiveness of Priority 1¹⁰

	Sub-priority 1	Sub-priority 2	Sub-priority 3
Assessment of progress:	<i>Many examples of progress in ways appropriate for contexts. Gender focus is not prominent.</i>	<i>All Chapters work with partners to achieve their aims but not always structurally. Little work on AntiCorruption Champions</i>	<i>Protection is taken up broadly, mainly through network building. SAFE is a good but limited knowledge resource.</i>
Way forward	<ul style="list-style-type: none"> - A more systemic approach to selecting the right approaches - Increase gender work 	<ul style="list-style-type: none"> - Network building remains crucial, also for security and advocacy - No focus on Champions; more on coalitions 	<ul style="list-style-type: none"> - Keep focus on protection, through whistleblowing, networking, ALACs & other available tools - SAFE can't provide global security, only training & knowledge, TI might need external security support.
Strategic issues	This strategic priority continues to be relevant and a lot of progress has been made. To reach its full potential, connecting it with the 'Doing what works' element in the Strategy, will be crucial. Chapters need guidance on which approach to choose in which circumstances, in a way that is as safe and effective as possible.		

¹⁰ Methods: To come to the findings regarding this strategic priority, our team has conducted desk reviews of 37 National Chapters, interviewed representatives of 13 National Chapters, surveyed 10 National Chapters and held one round table meeting.

Priority 2: Prevention & Enforcement and Justice

Under this priority, two very different aspects of TI's work are lumped together. The **development of standards and enforcement mechanisms** has been a staple of the work of the Movement and TI-S has been responsible for the production of many of these standards or tools. The other goal is, while not entirely new, still cause for debate as fighting impunity and **holding individuals and entities to account** has been one of the most important strategic shifts. Taken together, this priority entails the whole range of tools that TI can deploy to combat corruption in different stages of a country's development, different levels of acceptance of corruption as an issue, and different levels of protection of activists and space for civil society in general.

Priority 2a. Promoting prevention and enforcing anti-corruption standards

The action envisioned by TI to contribute to sub-priority 2a is to '*develop, monitor and advocate for key anti-corruption standards and practices, in both public and private sector*'. Most of the Chapters that took part in the review agreed that this priority encompasses the core of their work and stated that most of their activities aligned with the goals under this priority.

The issue of Money in Politics was in first instance a priority for TI-S to drive within the Movement but since TI EU as well as a number of Chapters such as the UK and Canada already worked on this extensively, it was not prioritised in TI-S. TI EU worked on the analysis of lobby registers, pointing out implausibility of the entries. The European Commission took up the complaints and those organisations have in some cases been suspended by the Lobby register. This ultimately also increased the awareness of reputational risks connected with good and bad lobbying. The discreditation of TI-US was unfortunate in this regard, as the issue of Money in Politics is especially relevant in the US since the Supreme Court's Citizens United¹¹ decision in 2010 allowed unlimited (often untaxed and undisclosed) private funds to be spent in politics. Several interviewees in TI's Governance and from TI-S have suggested that Money in Politics is mostly a Western problem and that it is not relevant for countries suffering from petty corruption or national Grand Corruption. Our findings do not support this assessment as the connection between Money in Politics and other types of corruption is clear and acknowledged by the Chapters in their strategies as well as in interviews. This is true nationally and regionally, and Chapters in South-America and Africa as well as Europe and North-America work on Money in Politics. The connections between political decisions, business interests, development and international financial flows on a truly global level however, have so far not happened in a comprehensive manner in the Movement. This would be important to show how much of the corruption in one country, or one type of corruption, is linked to Money in Politics in another country.

In the Private sector, TI-S is implementing projects to promote a clean business environment and identify best practices. For instance, the IMPACT project contributed with evidence-based knowledge products such as the BICA assessment that informs targeted advocacy activities around business integrity in two of the project countries (Trinidad and Tobago and Mozambique). 'Engaging business in the advancement of global standards to stop corrupt money flows' is another global initiative that aims to work with real estate professionals who are implementing Anti-money laundering practices to better detect laundering of stolen

¹¹ Citizens United v. Federal Election Commission, 558 U.S. 310 (2010)

assets. There are also numerous global projects implemented by Chapters - including Integrity Pacts, BIP or Mining for Sustainable Development - which include an element of engaging with the private sector to combat corruption together. At national level, Chapters indicate the private sector as a target group in their activities but we have found little evidence of projects with in which corruption in the private sector itself is a specific focus. TI Korea is an exception in this regard, with their Private Sector Transparency project aimed to promote integrity and anti-corruption related themes to companies. So while partnering with the private sector is common across all levels and every region, and there is work on prevention under a variety of global programmes which include the private sector, there are few national strategic programmes which specifically look at private sector corruption.

Some remarkable work has been done in Ukraine, where the Chapter acted as one of the main drivers in establishing anti-corruption systems with a range of different activities such as conducting an advocacy campaign on the establishment of an anti corruption court and further promoting the digitalization of public procurement data through the implementation of ProZorro software. Five Chapters (Vietnam, Lithuania, Russia, Brazil and Ukraine) implemented the Transparency in Corporate Reporting (TRAC) with technical and financial support of TI-S, with the aim of improving enterprises' public reporting practices.

The review found no examples of partnering with expert organisations to set a financial sector reform agenda in the Movement. Some Chapters such as TI Spain, have implemented national initiatives working with the banking sector to promote transparency and to hinder illegal practices of corrupted individuals and companies such as in the case of TI Spain. However, the financial system is international by nature and more global research and guidance are needed to understand how different national systems interact. This could help build up financial sector reform expertise in the Movement which could lead to TI being more vocal and setting the global agenda in the long term.

Priority 2b. Achieving Justice: ending impunity for corruption

The action for priority 2b is to *'apply increased pressure on law enforcement and justice systems to punish crime of corruption - especially grand corruption - and will encourage people to take action when justice is not served'*.

Mirroring the two elements of Priority 2 - prevention and ending impunity - this priority encompasses two types of actions: building the international conditions for ending impunity and fighting actual cases of impunity. A number of South-American and European Chapters, including France and Spain, have explicitly planned or implemented work to denounce criminal networks and individuals. Many other Chapters especially in Asia, have reported willingness to participate in global advocacy to persecute in cross-border cases, to monitor its countries' abilities to deliver justice, or help develop measures or tools to strengthen the justice work. However, these Chapters rarely engage in actively denouncing cases. In contrast with People & Partners, fighting global cases by one or more Chapters can have (unintended) negative effects on others Chapters in the Movement. Combined with a perception that some in the previous leadership were too strong in their public statements, this led to a resistance to part of this priority.

The selection process of specific cases to denounce, has been further reason for concern. From the interviews and the evaluation of the Unmask the Corrupt campaign it appears that the decision to denounce was not so much based on a substantive analysis of the case and the need to work on it as a network, but on

its value for attracting attention. The Theory of Change behind this decision was that by showing people what corrupt individuals or entities look like, this would embolden them to take a stance in their own context. We have found no evidence to support this assumption. Rather, interviews and the desk research show that the selection was random or hastily chosen instead of based on a connection to TI's research, political analysis or its ability to intervene where others could not. The Unmask the Corrupt campaign was also used to introduce new ways of working. Internal TI evaluations indicated that it was not successful in this goal due to design, financial and management issues. These have led to an early discontinuation of the campaign. Unfortunately, many Chapters still have not received clear communications on what happened and why the campaign was ended, which in countries where it was appreciated and useful, such as Panama, has led to disappointment.

The work done under priority 2b has been remarkable in some chapters and at TI-S level, as the Case Study on Grand Corruption points out. Beneficial Ownership Transparency is another area where significant success was achieved. Chapters, TI-S staff and external stakeholders have appreciated the Theory of Change of this campaign as it focuses on finding true beneficiaries of business interests, which can be applied at every level, nationally as well as internationally. Following the Anti-Corruption Summit in London in 2016, in which TI UK was heavily involved, TI's internal checklist for countries' progress towards Beneficial Ownership Transparency, was taken up throughout the Movement. Ghana was one of the non-G20 participants in that conference and all evidence suggests that the combination of external pressure and the involvement of GII at national level has moved the Ghanaian government towards implementation of a BOT register.

Another initiative which emerged from one of the interviews is the Promoting Rule of Law and Protecting Human Rights project in Georgia. The overall goal of the project is to strengthen the justice system in Georgia by engaging people and different actors in discussions related to reform of the justice sector, as well as strengthening due process and human rights. In Chile, the TI affiliated organisation implemented the 'Observatorio de justicia y impunidad' with the aim of following up on judicial cases of corruption, reviewing the real implementation of legislation and trying to prevent the system from stalling execution of sentences.

Effectiveness of the Movement in implementing Priority 2

The Movement recognised the importance of working on prevention and the other actions under priority 2a, given the fact that this priority covers the whole cycle from designing prevention measures to advocating for the investigation and prosecution of corruption cases by relevant agencies. As to priority 2b, and especially the aspect of denouncing people or entities, the interviews and focus groups clearly showed that this priority is more controversial for some within the Movement, particularly Chapter representatives and some who have been with TI for a long time. These diverging views have not come about because the work on Grand Corruption is considered irrelevant or even that fighting impunity could not be included as an approach for the Movement, but more because of the way this was done through the Unmask the Corrupt campaign and the actions of the previous Board. A lack of understanding on the *intention* of this objective, lack of agreement on *when and where* fighting impunity would be appropriate, and limited guidance on *how* to work on this priority, hurt the reputation of this goal in Movement even if Chapters voted it in the Strategy unanimously.

Figure 2: In the course of the MTR, the reviewers compiled three different samples through which the work on programmes in Chapters and at TI-S was assessed: a review of Chapter strategies, two spreadsheets with an overview of Chapter and TI-S projects, and qualitative information on programmes collected through the survey, roundtables and interviews. Based on the sample of chapters that participated in this review (n=55), we could extract the following data regarding the number of projects that are being carried out under each sub-priority. This very rough assessment was the only way the reviewers were able to quantify the data in the absence of a complete dataset on programme progress throughout the Movement. The qualitative data was used for the analysis as well.

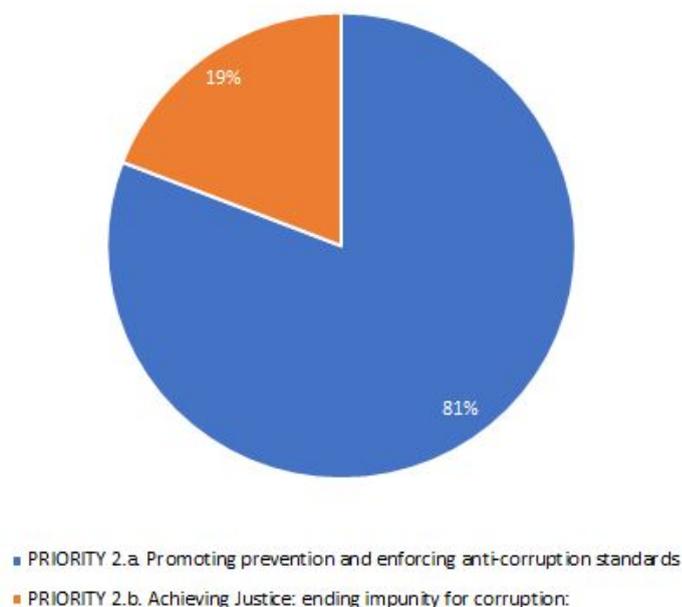


Table 2: Summary of the effectiveness of priority 2¹²

	Sub-priority 1	Sub-priority 2
Assessment of progress:	<i>Excellent work but not yet with the global reach that only TI as a worldwide Movement can have. Too much focus on new initiatives and approaches over using existing tools or knowledge.</i>	<i>Despite some differences of opinion and the lack of an effective global campaign, BOT, several Chapters and the GC work have in many cases been very effective.</i>
Way forward	<ul style="list-style-type: none"> - Global connections in finance, politics & business should be the focus of TI while continuing to build up capacity in finance - The default action should also not be to add another tool or programme - Build on the work of TI EU, the US office and a number of Chapters. to form a TI global Money in Politics hub or network. 	<ul style="list-style-type: none"> - Fighting impunity should not be seen as campaigning <i>instead</i> of doing the hard work of researching, connecting money flows, entities and political interests - Follow-through with BOT and the GC work, both in Chapters and TI-S - A good campaign to popularise a global view on corruption, could still be useful
Strategic issues	How to best use the fighting impunity work to further TI's global goals? What are the adversaries, how can they be outsmarted and how can the public understand what is actually happening? How can the work in under different programmes (BOT, GC, MiP, etc.) and at different levels (local, national, regional, global, thematic) be connected and reinforce each other?	

¹² Methods: To come to the findings regarding this strategic priority, our team has conducted desk reviews of 37 National Chapters, interviewed representatives of 13 National Chapters, surveyed 10 National Chapters and held one round table meeting.

A Strong Movement

Under this priority, a number of conditions are outlined which were identified as essential to effectively and efficiently implement the other priorities in the strategy. These have to do with understanding what **methods** can or should be used to fight corruption (sharing what works against corruption); with ensuring that the Movement is sustainable in its **ways of working, governance and finances**, among others (building a sustainable movement); and **being present at the right fora and in the right countries** across the globe (the relevance of the Movement).

Strong Movement Priority a. Sharing what works against corruption

The 'Sharing what works' goal encompasses three elements. First, there is the research on the nature of corruption, transparency and governance among others, that is available, that TI does itself or commissions, which sets apart TI from other actors and is part of its heritage. Another type of knowledge gathering and sharing concerns the types of interventions or ideas that are proven to achieve change in the fight against corruption. Thirdly, there is an effort to 'make available' both types of knowledge within the Movement as well as to other relevant partners.

This work requires the collection, structuring and processing of that information which makes it accessible in a logical way. The Strategy considers technology to be crucial to achieve this and TI-S has in recent years implemented a number of systems which allow everyone in the Movement to find and contact each other, share and store documents and works together on common projects. However, the reviewers have not seen instances where this global knowledge management system is integrated with knowledge management systems in Chapters.

There is wide agreement that the Movement should be focused on what works to stop corruption, but the understanding of what exactly that is remains mainly implicit. What works requires an interpretation of contextual dynamics - in countries and societies, of political and institutional landscapes - that is not drawn out explicitly across the movement. Therefore, what works against corruption is not easily shared across contexts as the information is not captured to a sufficiently granular level in order to control for external or internal factors. Having recognised this, TI-S has launched five research projects to understand assumptions in how corruption can be tackled. This is a clear expression of the strategic shift towards understanding impact Movement-wide, and could add to understanding of working towards, planning for and monitoring of impact. The Case Study on 'Sharing what works against Corruption' in the Annex, offers more detail.

Strong Movement Priority b. Building a Sustainable Movement

To build a sustainable movement, the aim of the Strategy was that TI would facilitate sharing of information and experiences on its own governance and management. Both in the document review and through the interviews, we found many instances where (horizontal) capacity building or learning took place among Chapters at regional level, in exchanges at TI-S or through common projects such as the SDG Project (EC Framework Partnership). The site visits and discussions with Chapters also made clear that exchanges with peers at national or even local level, frequently take place. All this is not done in a structured, coherent way but the principles outlined in the Strategy are widely taken up. Capacity building is seen as crucial and much

appreciated by Chapters, both for increasing knowledge and creating connections. This work could be facilitated by enabling all parts of the Movement to indicate how they can contribute to the Movement and what they need in terms of operational capacity. Funds should then be made available to bring supply and demand together.

The responsibility for increasing the financial stability of the Movement still rests heavily on TI-S. Several stronger and larger Chapters are able to grow and fundraise independently but much of the resources for larger projects still flow either through TI-S or require the involvement of TI-S. There is a strong request from Chapters to have more comprehensive protocols in place to allow multiple Chapters to engage in resource mobilisation together. These protocols would also be welcome in order to prevent competition between Chapters and to address the perception, shared by a few informants, that some Chapters may receive preferential treatment in receiving project funding due to their existing capacity or expertise. On leadership within the Movement, a programme was discontinued due to lack of resources and a de-prioritisation of the programme within TI-S.

Strong Movement Priority c: ensuring the relevance of the Movement

This priority states the importance of establishing the TI presence strategically to ensure the relevance of anti corruption activities. It envisions to do so by establishing a TI presence in those countries where corruption harms the greatest number of people (BRICs, MINT countries), implementing organisational models that go beyond the current 'one country, one chapter' model, for example TI EU, and enhancing regional advocacy presence through regional hubs as focal points. One way in which TI continued to work through networks of Chapters, was by thematic initiatives in the Global Thematic Network Initiatives (GTNI). In this initiative, which started before the current strategy, groups of Chapters worked on a specific theme with limited involvement of TI-S.

This emergence of sub-networks (by theme, capacity or region) can introduce a much needed agility in the way the Movement operates. But GTNI programmes either struggled to gain full independence from TI-S or the lead Chapter has become increasingly central, defeating the purpose of having more distributed networks. For the regions, they are perceived by both some Chapters and TI-S staff as too closed of or internally-focused and impact as measured through various evaluations, has been limited.

It is the assessment of the reviewers that these challenges in working through different models, are at least in part caused by a governance issue because TI's risk appetite did not increase commensurately with the devolvement of responsibilities, leaving the sub-networks torn between different demands. Partly it was also an operational issue because the capacities of different countries to contribute to these networks were unequal and insufficiently taken into consideration in the design of the initiatives. Still, given the increasing need for connectivity to fight corruption, the principle behind these new models remain highly relevant. One option to increase their effectiveness would be to facilitate the emergence of more informal sub-networks, which can grow into something more formal over time based on needs and functioning. The role of TI-S would then be to identify opportunities for such networks, support smaller or weaker Chapters build up their ability to participate in those, and connect these with other parts of the Movement.

Contexts change so rapidly that the focus on a specific number of countries - MINT, BRICs - has proven not as relevant due to the differences within those groups as well as changes in the global political landscape. The principle of having a presence in global centers of power or with actors driving specific aspects of the global economy or governance system, is still seen by several Board Members and Chapter representatives as being of crucial importance. TI's presence in Brazil and the push to have an office in Washington despite the discreditation of TI US, were mentioned as examples where TI actively pursues this. The G20 is important as an advocacy target but in the view of the reviewers, the G20 advocacy strategy (as any advocacy with global implications) should be driven by the whole Movement not just by the G20 countries. The BOT work is a good example in this regard, as a number of non G20 countries (Ghana, Nigeria), were included as well.

Effectiveness of the Movement in implementing priority 3

There are two ways to judge the effectiveness of the Strong Movement goals. One is that the core principles and practice of collecting and sharing knowledge, as well as building a sustainable movement, are indeed widely shared in the Movement and integrated in many of the common projects and national work of the Chapters. The other is that as a strategic objective, it is difficult to track progress when it is formulated as vaguely as it is and without any indication of who in the Movement should be responsible for which part of its implementation. This means that the reviewers find that these two Strong Movement outcomes have not been pursued in a comprehensive manner, outside of the implementation of new digital communications tools by TI-S. The question of who bears responsibility for that operationalisation is a source of disagreement within the Movement. Multiple Chapters have expressed an expectation that TI-S would take the lead and even seem to wait on their initiative, where capacity at TI-S is limited and they see these objectives as collective responsibilities. The reviewers think that both are right. Where it concerns the principles and behaviours, Chapters are and should be implementing the Strategy directly while TI-S, the Board or another body or group needs to take the lead in areas where investments or new tools and approaches are needed.

Table 2: summary of the effectiveness of the Strong Movement priority

	<i>Sub-priority a</i>	<i>Sub-priority b</i>	<i>Sub-priority c</i>
Assessment of progress:	<i>People in the Movement are now able to find each other, and there are multiple ways to share success but take-up in the Movement is still low.</i>	<i>Some good work is being done but the challenges outpace the solutions, especially on fundraising.</i>	<i>Work on BOT with the G20 is effective and the presence of TI in power centers is on the radar but resources are limited</i>
Way forward	Share what works needs to be based on an analysis of the political & societal context to allow others in the Movement to learn. It should also include operational aspects: what is needed to make it work?	<ul style="list-style-type: none"> - Chapter capacity building should be expanded - Leadership is not a priority - Collaborative fundraising is; TI needs to solve that soon 	Being present in centers of power is crucial. Which those centers are at a given time is a matter of strategic analysis & choice which should be continuous, not one-off in a strategic plan.
Strategic issues	The Strong Movement work is dependent on resources, good relationships between Chapters and a clear division of tasks between Chapters, TI-S, global hubs and others who take up responsibility for part of the work of the whole Movement. On all these fronts, work remains to be done but the importance of the original priority is not questioned.		

MEL

The explicit commitment to monitor impact as a Movement was new in the 2020 strategy. The aim was to work towards a system in which impact would be monitored through a Movement-wide practice, and understand how to achieve it collectively. Conducting small-scale learning reviews were included, as was undertaking this Mid-term Evaluation of the Strategy and validating assumptions on how change is achieved in combating corruption.

Alongside this, the Movement also conducted two surveys: one to obtain a view on progress on Chapter work towards the Strategy in 2016 and a second one in 2017 to understand the impact achieved against the 2020 Strategy¹³. The survey had a limited number of respondents and for many Chapters, the Strategy proved insufficiently internalised, which meant that the survey results did not allow TI to draw far-reaching conclusions on its progress on or impact under the Strategy. The opportunity TI-S had to map out both was thus limited. The reviewers have not been able to retrace why the surveys had low response rates but lack of enthusiasm and confusion about TI's MEL practice were mentioned frequently by respondents.

Part of this confusion is related to another tool developed and piloted by TI-S alongside the 2020 Strategy, which was a Monitoring Guide and an impact matrix. Under this pilot, training was provided to a number of Chapters (those who were part of the pilot and upon request). Furthermore, the Monitoring Guide outlines a process to monitor impact at various levels and moments in implementation. As this was a pilot project with limited scope, not all interviewees had first hand experience with it but all of them were to some extent aware of it, even if they were not sure of its status in TI's overall MEL practice. Among interviewees with direct experience with the system, the perceptions on the success of this Monitoring Guide vary. Some have fully taken on board the matrix and processes, and have adopted it as a fixed feature of their own monitoring work. Others found it difficult to integrate the Impact Matrix with their other reporting duties. Several Chapters without direct experience with the Matrix expressed confusion as to what the status of the pilot was. They indicated that they felt uncertain about participating in any reporting on the strategy or on impact, as long as there was not a clear decision on an approach which they could expect to be using for the foreseeable future. At the same time, it is our assessment that the Chapters in some cases are also resistant to sharing information, not only through reporting but also more generally on their approaches and experience. As this is a shared responsibility, this precludes significant Movement wide progress on impact tracking.

Most interviewees do think that the strategic choice to focus more on impact, and making it more explicit, and to do this Movement-wide, is the right one. The quality of tools developed by TI-S are not in question either. Several interviewees do point out that the concept of 'impact' is not yet widely understood across the Movement, and many within the Movement are still more comfortable with reporting outputs and outcomes. Lastly, the link between monitoring and actual learning is considered weak. There is a wide acknowledgement that it is not easy - certainly with advocacy approaches - to measure impact, and attributing that impact clearly to the Movement, but there is a motivation to find ways to use the information available to learn, report and adapt.

¹³ The results of that survey were part of the documents reviewed

A potential pitfall with an increased focus on impact is that not every action done within the Movement is covered by the Strategy and thus reporting impact against it is not going to result in an all-encompassing view on the collective impact achieved. Learning from these activities could then potentially be neglected to inform future direction of the Movement. Secondly, focusing exclusively on impact risks to exclude that what cannot (yet) be measured. There is a lot of implicit understanding, often linked to an intimate understanding of context, that is determining the success of approaches. The story-telling approach for example can bring such understanding to light, whereas a rigid indicator measurement would most likely overlook it. The aspect of collective reflection, even involving partners, is therefore seen as a positive aspect of the monitoring tool by those that actually use it as intended, as well as by the reviewers.



IV. THE ROLE OF TI-S IN THE IMPLEMENTATION OF THE STRATEGY

In this chapter, the process of developing the strategy, its function and form, as well as the role of TI-S in its implementation, are discussed. This in response to the questions in the ToR related to the role of TI-S but also because in interviews and focus groups, the role of TI-S was brought up frequently without prompt. We have attempted to acknowledge this sentiment even as some topics were outside the scope of this review.

Development of the Strategy

The Strategy 'Together against corruption' draws on a consultative process held across TI and key stakeholders. To gather insights from the Movement, surveys, meetings, interviews and written inputs were used for a total of 1000 contributions coming from TI - all staff were invited to contribute - and 500 contributions from outside the Movement. The Strategy has been unanimously endorsed by the Movement at the Annual Members Meeting in September 2015. Still, the process was considered by several interviewees to be less inclusive than the the process leading up to the 2015 Strategy. It appears that this perception is not so much a result of the process itself, but rather of the feeling people have in hindsight that the outcome was already set in stone and that the process was consultative rather than collaborative.

Function of the Strategy in the Movement

The strategy document are criticised not so much for what it is in them - which is deemed relevant and logical - but for the lack of analysis connecting the various elements, and confusion as to what the relationship is between the Strategy, implementation plan and monitoring practice, at different levels in the Movement. There is also a perception among several (former) Board Members as well as Chapter representatives, that clear strategic choices have not been made in the Strategy. Finally, limited operational guidance was provided upon adoption of the Strategy which meant that the ownership over or responsibility for certain parts of the Strategy - particularly the Strong Movement priority - was unclear. This is caused, in the reviewers opinion, by the hybrid nature of the document and inconsistencies in the communication around it:

- The Strategy itself serves as a summary of what TI does as a Movement, with some accents which allow us to understand the intended strategic shifts;
- The Strategy does not prioritise global goals for the Movement or any part of it and does not allocate responsibilities (it references 'we' in different senses: as actors in implementation, as the audience for priorities or as the Movement adhering to certain principles);
- For the Strategy itself, no costing, fundraising strategy, implementation plan or any other detailed operationalisation was developed;
- The Implementation Plan for TI-S only covered the implementation of the substantive aspects of the strategy selected by the TI-S itself and approved by the Board;
- However, the IP does not make the connection to the other functions of TI-S in the Movement. These functions are not part of the Strategy but certainly have a bearing on the ability of the Movement to implement it, as TI-S plays a pivotal role in facilitating the Movement;
- The MEL practice, Impact Matrix and the Impact Log, are fit to measure impact but the Strategy does not include the change markers for the Movement, which would also be difficult given its broad nature and the differences in context, focus and interpretation of the underlying concepts;
- Little to no guidance was provided to Chapters on how they could interpret the Strategy, operationalise it, or select the appropriate approaches for their context.

Together, this reinforced the image of a strategy which is all-encompassing without being useful for guiding the Chapters' own work. Some - strong, well-connected - Chapters, in countries which were the conditions are in place to operate relatively easily, were able to use this broad Strategy as they saw fit. But for Chapters with limited capacity, or larger Chapters with the ambition to be more innovative or bold, the strategy proved either to be vague or included priorities which were not useful.

Role of TI-S in implementing the Strategy

Looking at the relationship between the IP and the Strategy, there are broadly speaking three areas in which TI-S implements the Strategy for or on behalf of the Movement.

1. Servicing & facilitation
2. Developing programmes, tools & approaches
3. Global Advocacy

The TI-S Implementation Plan, however, does not serve as a work plan but in this way provides the identification of areas in which the responsibility for the implementation of the Strategy rests partly or wholly with TI-S. In the sections on effectiveness in implementation in Chapter III, the role of TI-S has been discussed in achieving some of the specific strategic objectives. But in developing its own Implementation Plan for the Strategy, it has also made a number of important decisions on the interpretation of the Strategy, which process Chapters have felt left out of according to some of the EDs interviewed.

Servicing & facilitation

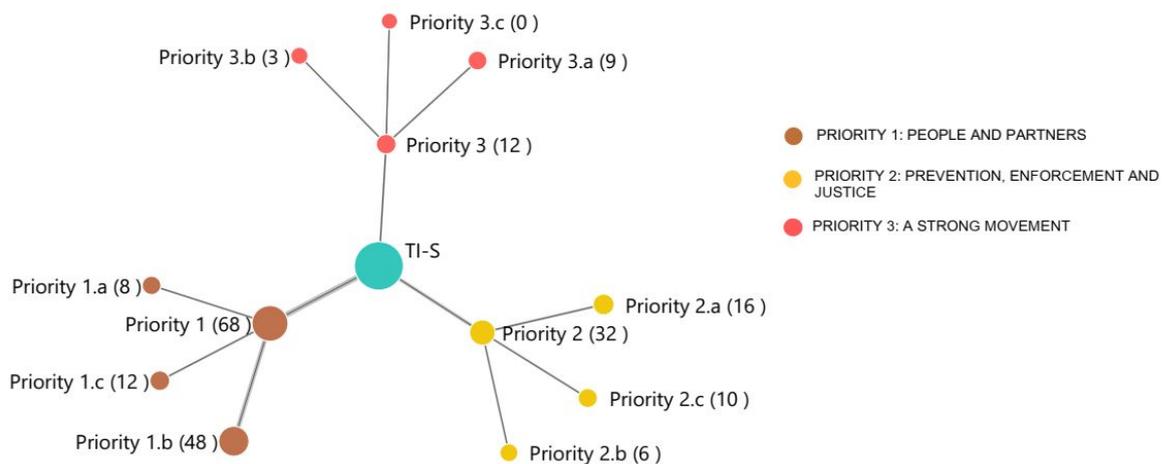
Several of the outcomes in the Strategy rely on the horizontal exchange of information, experience and knowledge, in addition to knowledge sharing being an independent objective. This is true for example of the ALACs, which are an important part of People & Partners, and of facilitation of exchange on public demand

for accountability, also under People & Partners. Sharing what works and best governance and organisational standards have been identified by TI-S as areas in which they should lead. A lot of appreciation and excellent work has been done in ensuring to support Chapters in these areas, including in updating the accreditation process. However, the changes in TI-S and the magnitude of the tasks emanating from the IP have meant that a lot of work still remains to be done and there is a measure of impatience, especially among more independent Chapters but also in Chapters with limited capacity as they would benefit from more support with the implementation of the Strategy. The perception also exists that due to changes in TI-S in the past years, expertise crucial to these supporting functions of TI-S has been lost, and that the changing role of the Regional Advisers risks further infringing on those functions.

Developing programmes, tools & approaches

Several of the actions in the IP involve TI-S developing initiatives to implement the Strategy. These include security mechanisms for activists, public budgeting, whistleblower standards and Business Integrity. Developing these initiatives and several others is a core part of what TI-S has always done and it well placed to do. The quality of these tools and their usefulness are widely acknowledged in the Movement. Some have indicated that the development of standards or guidelines takes an excessive amount of resources while it is not always evident to which extent these will be used let alone have an impact in a cost-effective way. There is also a risk of initiative overload by adding new tools and approaches whenever a new concept or forum emerges.

For the MTR, a number of the programmes developed and run by TI-S have been reviewed and assessed. An overview of these programmes can be found in Annex V and their assessment has been integrated in Chapter IV. Outside of these programmes, TI-S has led on a number of areas under the strategy, including on Grand Corruption and in producing the Corruption Perceptions Index. Figure 3 shows the number of programmes that TI-S is leading as of 2018, disaggregated per priority and subpriority in its Implementation Plan.¹⁴



Global Advocacy

On a number of topics, TI-S aimed to lead on advocacy in international fora. These include the SDGs, the protection of the space for civil society, global business integrity standards and on the resolution of grand corruption cases. It also aimed to run public campaigns on international cases of impunity. These focal areas for TI-S described in their IP, should have been included in the Strategy in our view. The fact that on an

¹⁴ This is the reviewers assessment based on the information collected

operational level TI-S is responsible for leading these does not mean that it should set its own priorities. This is not to say that the advocacy in these areas was not effective. Especially on Grand Corruption and the SDGs for instance, TI was able to participate at the highest level and achieve promising results. But the strategic decisions on these priorities should not have been made at the level of the Secretariat.

The impact of the organisational changes in TI-S

Numerous interviewees from across the Movement indicate that in their view, organisational and operational issues in the Board and in TI-S have significantly affected the Movement's ability to implement the strategy effectively. Whether this view is justified is beyond the remit of this review. However, it is clear that there is still a mismatch in perception of the role of TI-S, the Board and Chapters of different sizes and capacity. Perhaps instead of lingering on the historical origins of these misconceptions, a focus on possible ways forward would be more productive, by designing collaborative processes in line with the Movement's governance structure and organisational character, and conducive to achieve its aims. However, in designing these collaborative processes, TI should acknowledge that those entities that are professionally engaged with the Movement or are in its leadership - in other words TI-S and the Board - automatically have more influence over the outcomes of any decision-making processes. Getting to an equal outcome requires unequal input, so if the Movement is to be in charge, offering the opportunity to contribute is not sufficient; the contribution needs to be organised in such a way that all Chapters can provide meaningful input, which would require additional effort and resources from TI-S for smaller or weaker Chapters.

V. CONCLUSIONS & RECOMMENDATIONS

In this final chapter, we summarise narrative, conclusions and a number of recommendations connected not to specific goals or processes, but to a synthesis of different aspects of the Strategy and its implementation.

Overall conclusion

The reviewers conclude, based on the evidence collected and an analysis of TI's organisation, its Theory of Change and its context at various levels, that the **strategic shifts which are implicit in the 2020 strategy make sense**: the addition of more activist approaches and the connection with social movements are important additional ways in which TI can respond effectively to changes in the global context.

The review shows that **the goals outlined in the Strategy 2020 are increasingly relevant** and that the **Movement is well placed to help achieve these goals**. To realise this however, increasing operational effectiveness is essential. This would seeing the move towards a truly distributed network through, with a professional hub (TI-S) facilitating the network and identifying connections, and individual nodes (Chapters) which take responsibility and work together even without external incentives. Such a network would not necessarily need a Strategy but could rely on a commonly formulated agenda allowing it to be coherent and agile at the same time. It would be important to at the same time continuously debate high-level issues and TI's own assumptions, to help identify the true causes of corruption, social inequality and poor governance globally, regionally, nationally and even locally.

Adjustment towards achieving the strategic goals

Priority 1: People & Partners

ALACs or its precursors

The ALACs have proven to be an excellent approach to working with people on the ground, supporting them in actual cases and collecting data in the process, without compromising TI's role as an expert organisation working with governments and the private sector. TI should build on this success by ensuring data is collected systematically and aggregated internationally, standards are reviewed and adhered to, and Chapters are supported in setting up, running and funding their ALACs. In countries where establishing an ALAC is not (yet) feasible, a more low-key or specific avenue for citizens to connect with TI such as through a hotline, online forum or informal meetings, should be explored to at least have this connection with citizens and collect information, and possibly as a way to prepare for setting up an ALAC at some point.

Selecting the right approach

Where the space for civil society to engage in Human Rights debates is greater, Chapters could try to be more bold in convening or leading coalitions of activists or working with journalists to expose corruption. Where the space for such debates is more limited, for example because there is no free press or independent judiciary, or where civil society is not very coordinated or strong, support or capacity building for specific audiences are a prudent first step, whereby more attention should be given to gender representation. In that second scenario, information collected can still be shared with others, which helps to build the CSO networks which are crucial for advocacy and security, among others. Given the context specific nature of these and other approaches TI uses, Chapters would benefit from guidance on when to choose which approach, and what the conditions for success of an approach are in their context. This could take the form of a simple decision tree or manual.

Security and the shrinking space for civil society

The SAFE unit is a good resource for the Movement and should continue to provide technical expertise on security issues, both proactively and reactively, and build up a knowledge resource for the Movement. More funds would increase its scope and ability to respond to queries, although it cannot be expected to become a security provider for the Movement in the way humanitarian organisations do this. This is because the nature of the Movement (independent organisations) and the differences in the interplay between context, language, focus of a Chapter and risk, among other factors, make the challenges too diverse to be managed centrally. Should there be a need for more hands-on security support, TI would need to partner with others who have the required infrastructure and experience, either globally or through Chapters' national partners.

The principle of building networks in-country while being part of a global network (the Movement), is generally an effective and efficient way to reduce risk in a structural way, as it allows individual people or organisations to have some sort of back-up. This is not only true for security but also protecting the space for civil society, effective lobbying and exposing cases of corruption: horizontal networks nationally, and a vertical network internationally, offer protection and more impact. Reinforcing this aspect, and sharing best practises in building those networks, could help TI already in the short term. So while this is not the only

solution as some security risks are more targeted or occur where the civic space is still wide open, it is a general good practice for a number of reasons, including managing security risks.

Coalition building

TI should continue its work on People and Partners. It should, however, focus more on building lasting coalitions with existing social movements and activists, and making them sustainable, than on campaigning, as that is not one of TI's strengths. TI could - through its Chapters - play the role of expert convener and driver, able to coalesce different groups around a common concept or demands, thus playing a vital role in turning the social energy of activist Movements into lasting change without compromising on TI's values or shifting away from its core strengths. This is already happening in many Chapters and should continue to be a core approach for the whole Movement.

Priority 2, Prevention, enforcement and justice

Money in Politics

The role of money in political decision-making is a global issue playing out in different ways. The influence of money is not only exerted through illegal avenues such as corrupt procurement procedures, illegal campaign financing, or bribing politicians, the police or the judiciary. A substantial part of the money spent or earned is legal, especially when it comes to access to policy processes through lobbying. The common element is that this money has not only national, but also cross-border impact, in particular in areas such as arms trading, healthcare/pharma and climate change. The negative consequences of these practices can only be tackled by a collective effort from a network such as TI. TI EU and TI's future presence in the US (which should thus cover more than the lobby of the US Institutions) could play a vital role in this effort, with a coalition in the Movement and overseen by TI-S, to surface the global connections of Money in Politics. Thereby, TI needs to move beyond a legalistic approach to corruption and address de-facto corrupt practices that are detrimental to the quality of governance systems, economic justices, and the environment, among others.

Grand Corruption

The work on GC is relevant to the global context and should be kept as a focus in the next strategic planning cycle. The review team found positive contributions and successes achieved at both chapter level and thanks to the work of the GC team in Berlin. However, the work done so far on the GC could benefit from more movement integration. Despite the fact that some regional coordination emerged - for instance on the Odebrecht case, where national chapters whose countries were involved constantly communicated and shared relevant information - more could be done. TI-S through its GC team could play a bigger role in coordinating chapter's efforts and to bring national issues together to create a regional and ultimately global picture and connecting different Chapters to support each other. This would require additional resources or a different mandate, where the GC team limits its global advocacy role.

Denouncing as a Movement

The strength of the Movement should be in adding value where others can't, which is in making the connections between countries, organisations and different sets of information. Therefore, the focus of the Movement should be on those cases which require a network approach to solve, not necessarily attacking global figureheads to generate attention. In some cases that might be useful and possible, but the arguments

for a decision by TI's to - as a Movement - denounce and take up a specific case, should be based on the value added of such a case. That added value lies in making connections within the Movement and externally, to expose how corruption works systemically and how to address it systemically, rather than who is corrupt.

Beneficial Ownership Transparency, Financial Markets & Technology

Grand Corruption and Money In Politics are the prime areas where TI can add value, and BOT has proven to be an effective tool for exposing money flows relevant for both. On tax evasion, financial markets and areas like Development and the SDG, TI should really be part of coalitions rather than trying to design their own programmes. On technology, TI should perhaps try to play a larger role. New technologies are a facilitator of corruption, can facilitate or erode democratic institutions, and can help a Movement like TI to effectively work together. However, given TI's limited resources, in the short term it may be wise to work with other organisations with more experience in this field.

The 'A Strong Movement' priority

Fundraising

In terms of fundraising, there should be more collaborative exercises and TI-S should try to move away from being the centre of all financing. Fundraising is always done in collaboration, with final decisions made by the implementing entities. TI-S should only play a regranting role if it is absolutely needed, and if it does, it should minimise its involvement to the absolutely necessary to administer the funding relationship. In any case, a clear protocol needs to be put in place to allow collective fundraising by a number of Chapters, which protects the Movement against internal competition and addresses the power imbalances between larger Chapters, TI-S and smaller Chapters, by standardising the process.

Collaboration & Coordination

The diversity in the uptake of the different priorities by different Chapters in different locations at different times makes clear that the Strategy has allowed Chapters to use it in their own context for their own priorities. At the same time, the Movement as a whole is also interested in remaining or becoming a fully vertically and horizontally integrated network organisation, which can do anything from organising at grassroots level to engaging in global policy processes, depending on what is needed. The Strategy reads as a Theory of Change for how that can be achieved. More guidance on how the Movement would be able to operationalise that ToC, would be needed to turn that theory into practice.

It will however, remain the responsibility of the leadership to identify strategic priority countries or regions to expand its presence if the Theory of Change or Strategy requires it, to identify new trends or approaches in which the capacity of the Chapters should be enhanced, and in facilitating a process to do coordinated fundraising. It remains equally important for a central node in the Movement, to connect the regional or thematic sub-networks, identify overlaps or gaps, and facilitate discussion in the Movement on how to deal with those. TI-S should in the reviewers assessment, focus more on that aspect - facilitation and coordination - with global programming explicitly supporting that role rather than being a goal in itself. The Chapters will then automatically need to take up a greater responsibility, not only to lead coalitions but also to offer support, expertise and training to other Chapters.

Knowledge management

To facilitate that way of working, as well as to achieve the 'knowing what works' and sustainable Movement goals, knowledge management becomes even more central. In addition, knowledge management is pivotal if Chapters are to be responsible for supporting each other and for making global linkages of cause and effect in Money in Politics or Grand Corruption. Data collection and processing should therefore become even more prominent, with research as ancillary to support this knowledge management if information gaps exist. Reporting should also be seen as secondary, following from the data rather than being a goal in itself. The knowledge about the Movement and its work, together with the analysis of the external environment, globally, regionally, locally and thematically, should also be more prominent in determining the research agenda and tools. This can be taken up by TI-S but Chapters need to make this link explicitly as well.

Innovation

Regular discussions organised geographically and/or thematically on TI's underlying concepts are needed to be on the forefront of global debates in which long-standing assumptions are overturned and certain institutions on which TI has always relied to generate global impact are delegitimised. In organising these discussions, it is important to take advantage of the diversity in the Movement to shape those debates. Our review has found that different views and experiences on organisation, governance, corruption and democratic participation exist, and are available throughout the Movement. These lessons could help TI to become more cutting-edge and combine the best elements of harmonised global governance systems and anti-corruption standards, with decentralised or more informal ways of organising which are not as intertwined with liberal economic theory. The combination of the People & Partners priority, with the prevention subpriority, already hints at TI's goal to combine both.

Sub-networks

Supporting the emergence of transversal networks within the Movement working on themes, towards a shared advocacy goal or in a geographically relevant coalition, remains crucial. However, the way TI does that should be reviewed. The objective according to the reviewers, should be to allow for more experimentation and thus failure of such sub-networks, accepting that only a small number of such initiatives will result in substantial and sustained results. At the same time, TI-S should ensure that smaller or less experienced Chapters are supported to participate in relevant sub-networks, through targeted capacity building or resources. This allows these Chapters to participate and the Movement to benefit from their voices. TI-S should also be able to scan for gaps in themes or locations where insufficient collaboration is taking place, and initiate such a sub-network with the purpose of it running independently in a short period of time.

MEL

In spite of challenges in introducing the notion of impact at TI, most interviewees agree that TI should continue to raise the understanding on and importance of impact across the Movement, and the reviewers agree. In rolling that out, TI-S should communicate clearly to the whole Movement the complete set of reporting responsibilities that a Chapter has vis-a-vis the Movement, including its in the renewal of its licence, in annual reports, in sharing best practices or organisational data, and in impact measurement. This should also include a clear value proposition for Chapters: how can they benefit from the data, access aggregated information, draw lessons from the system, etc. Once this is done, Chapters have expressed their wish that

such a system is maintained for a number of years so as to make their investment in learning how to work with it, worthwhile.

Under the current Strategy, TI has moved towards an impact focused monitoring system, and is in the process of building a digital tool - The Impact Log - to collect this information. However, keeping in mind the core function of data collection rather than any one output created with that data, the impact matrix and impact log should be simplified, with fewer questions and easy to use (e.g. through an app). In the Monitoring Guide, this is complemented by a process for assessment at various levels and intervals, including within the Chapters as well as at TI-S level and in the Board, at ever increasing levels of abstraction. This is an excellent approach and should be implemented throughout the Movement. This would require support from TI-S as a collaborative approach to MEL may not be as well established everywhere.

Strategic issues

The reviewers are convinced that TI should continue to work on the two substantive priority areas: People & Partners and Prevention & Fighting Impunity. In doing so, the focus should thereby be less on developing ever more tools and programmes but more on making the connections. These tools are necessary and appreciated in many cases, including for BOT, but it is making the connections between countries, issues, political levels, policy processes, etc. that the Movement can add its unique value. The connections should not only be identified reactively by following developments in the field, but should be shaped by TI. This ambition is at the source of the emerging Trends & Vision committee of the Board but should be part a Movement-wide exercise, or culture even. Given the global political and social context, TI could really add value by investigating the relationship between governance as a cause, not just a the solution for corruption, and inequality as both a cause and result of corruption. By doing so, TI could lead the debate to ensure that the positive aspects of the liberal order - rule of law, good governance, etc. - are saved while the excesses - imperialism through global institutions, monopolies in finance and technology, rising inequality - can be mitigated. A more dynamic concept of corruption and transparency, and an ongoing analysis of the world and new developments in the field of corruption, would help to achieve that.

Operational issues

TI-S is well placed to scan global trends, identify opportunities and most importantly, make connections that no other actor can make. It is in a unique position in that it has access to both the national grassroots level in many countries, and to global policy processes, and research credibility as well as a global network of CSOs, academics and policy experts, which can be harnessed not only to respond to developments, but to predict and influence them before or as they occur. Doing so however, requires operational effectiveness in working together as a network, which is what the focus of the Movement should be in the coming years. The most important challenge for TI is operational, not strategic: how to better operationalise the current strategic priorities, which are relevant, and foster the strength of the Movement, which is substantial.

Helpdesks

The role of the Helpdesks could be made more prominent and expanded to facilitate an ongoing debate in the Movement on some of the crucial questions that have emerged and will emerge, on how corruption is defined,

what the relationship is between corruption and inequality, whether there are innovative forms of public governance that could be promoted, etc. Especially if the idea of a strategy is seen as creating an agenda (see below), the Helpdesks can become instrumental in ensuring that this agenda is continuously connected to different contexts and changing needs.

Searchable database

At the same time, the push to reinforce the creation and sharing of knowledge as essential to the identity and ways of operating of the TI Movement, should continue. This can be done through digital channels or through knowledge networks. Many opportunities and mechanisms through which knowledge can travel through the Movement, and can become accessible outside of it, already exist and could be used more effectively: stimulating the travelling of stories, creating thematic alongside regional vicinities, duplicating on Yammer, Internet, Intranet, Newsletter; the role of the Regional Advisors and Help Desks in knowledge sharing.

TI-S should build up a searchable database for the Movement, in which impact monitored, data on the capacity of chapters, outputs and activities, and policy processes, can be captured. This would allow for a much more granular and thus sophisticated cross-analysis between context, tools, approaches, impact and change, identify gaps in knowledge, and offer tailored support or mobilise resources in a targeted way. The ALAC database is a prime example: it is extremely useful but currently not populated or used to any substantial degree.

A Global Agenda

In a way, the Strategy 2020 reads as an excellent Theory of Change. It provides a reasoned overview of the way TI should operate as a Movement given the changing context and TI's level of maturity. In that sense, it can be a useful document. It is however, not a classical or complete strategy, outlining goals, specific work areas, selected instruments and specific actions, and then elaborating on these to allow a clearly defined actor or group of actors to implement the parts relevant to them. On the basis of the information gathered during this review, the reviewers think that such a classical interpretation of what a strategy is, is not the right approach for a diverse global Movement working on an issue which plays out so differently in the different contexts in which it would have to be implemented.

This is why we would rather call it an Agenda, as this term better reflects that it concerns an ambition based on a shared vision but that the ways to achieve this vision are too different to capture in one strategy against which the Movement can hold itself accountable. This Agenda would be implemented through a range of approaches and methods, akin to those outlined in the current strategy, which allow actors in the Movement to decide which for them is the most effective way to work towards that Agenda. As a document, such an Agenda would be much shorter and high-level, focusing on what TI thinks it should work towards rather than what it can achieve (as this is again, very different in different contexts).

This Agenda, could then be complemented by a strategy specifically for global advocacy and campaigns which will contribute to that Agenda. In such a global strategy, a small number of concrete global advocacy and campaigning priorities are outlined on which the Movement truly works together. So the Agenda is the overarching ambition, and the global advocacy and campaigning priorities works on the section of that ambition that requires a Movement-wide effort.

This system could have the following characteristics:

- The global agenda should be identified by the TI-Secretariat and Board, using the data that it continuously collects from and on the Movement;
- Periodically, the Global Agenda will be agreed;
- In preparation for this, an open consultation and debate will take place within the Movement. This process should be based on the available information on Chapters' needs and priorities. The process can start at a higher level of abstraction and focus on fundamental strategic choices as well as strategies and tactics to achieve those;
- TI-S and the Board are responsible for processing the information and opinions into a document, which is to be ratified periodically (for example every 5 years, similar to the Strategy) by the AMM;
- The Global Priorities should be complemented by an Implementation Plan, outlining all the operational and organisational implications and needs, covering the commitments of Chapters, TI-S and other actors in terms of their contributions as well as budgeting;
- Progress on these priorities can then be monitored in a comprehensive way, allowing the Movement to hold itself to account for achieving specific goals.

On all other issues TI-S should function as broker or facilitator. These functions, together with the governance role of TI-S, should be operationalised in a work plan for TI-S which is wholly separate from the Agenda and the responsibility of TI-S itself, under the TI Board. This approach renders a separate IP for TI-S' interpretation of the Agenda or Global Priorities unnecessary.

The role of TI-S

A rebalancing is needed between the responsibilities of the Chapters and TI-S. This should involve different accents in the roles TI-S plays but it also requires a greater sense of responsibility of Chapters. Under the Strategy, it is up to them to define what they can contribute, ask for support and provide it to others, and raise the resources to do the work. With certain changes in TI-S, the Chapters will need to move beyond their focus on what TI-S is not delivering and view the Movement as a proper distributed network. Communicating about these evolving roles is crucial and should be done in an engaging and positive internal campaign.



ANNEX I: CASE STUDIES

Case study: ALACs

Topic & why it was selected

For the TI MTR, ALACs were selected as a case study in order to shed light on its contribution to the goals of strategic Priority 1: People and Partners. ALACs are one of at least 20 projects under this priority area but precede the current strategy, they provide a service in addition to supporting TI's advocacy work and are implemented across the Movement from the same basic template, making it an interesting lens to compare how Priority 1 was implemented in different contexts. The case study is informed by a document review, specifically involving existing ALAC evaluation reports, as well as interviews with and documents from several ALACs, including the Dominican Republic, Ireland, Ghana and Zimbabwe.

Achievements in terms of the strategy

All the ALACs on which this review collected information, have managed to raise awareness on corruption, assist victims of corruption and to some extent keep the local law enforcement institutions aware of efforts to combat corruption. Where law enforcement institutions have resisted the efforts of the ALAC and it has been difficult to establish partnerships, it has not been out of lack of awareness, which in itself can be regarded as an achievement on the part of the ALACs.

One of the key achievements of ALACs has been adapting to their given political landscapes to still achieve effectiveness. The Zimbabwe ALAC has been running since 1996. Between 2017 and 2018, they managed to set up 3 regional ALACs in 3 provinces. Between June 2017 and July 2018, they assisted 718 people, on issues including the allocation of land for housing; judiciary complaints and complaints related to the conduct of police. While operating in a country that has a poor record of corruption intervention and a high level of systemic corruption, they have still managed to form partnerships with local law enforcement institutions, including the Anti-Corruption Commission and the Judiciary. The formation of these partnerships is remarkable, given the absence of political will to combat corruption. However, this same absence of political will limits the space of the ALAC to fighting petty corruption rather than targeting grand corruption.

The ALAC in Ireland has been running since 2011. It provides support to whistleblowers on corruption and malpractice through a helpline. It has formed partnerships with the Public Interest Law lines, the Transparency Legal Advice Center and has support from local law enforcement institutions including the police departments and other government departments such as the Department of Justice. In spite of these partnerships, the ALAC's support is dependent on individual civil servants and its sustainability is therefore not guaranteed. Focus on corruption is perceived to be low on the government's priority list and resources to mobilise the general public are limited.

The ALAC in the Dominican Republic started in 2008 and has since closed due to lack of funds. At the time of running the issue of corruption was neither on the public's agenda nor on the government agenda. Since then however, the TI Chapter has raised awareness on corruption and as secured funds on anti-corruption

activities in other lines of intervention. The Chapter has been engaged in discussions to reinstate an ALAC as a regional theme.

In Ghana, the ALAC has been creative in adapting its methods to the needs of the local context. Given that people are afraid to report on corruption cases or are not able to access the three ALAC offices, the Ghana Integrity Initiative (GII) has established a mobile ALAC system where the ALAC travels to speak with people in rural communities. To ensure that their work through the ALACs does not compromise their access to national policy makers or institutions, they are brokers rather than persecutors filing complaints themselves. They collect the complaints, point the complainants in the direction of the relevant enforcement agencies, and support them if needed or connect them to specialised organisations. If it concerns a case of Grand Corruption or a systemic form of petty corruption in for example education, GII will share this information with their network in order for these others to expose the practice.

Amongst themselves, some ALACs have created networks. The Zimbabwe ALAC for example reaches out to TI Ghana and TI Kenya when they need support. Similarly, TI Dominican Republic considers having an ALAC as a regional theme in their region. While these informal processes facilitate the sharing of lessons, there is more potential for regional-wide or global-wide sharing of good practice through a coordinated process.

Contribution of the ALAC's to Priority 1

The ALACs that we considered for this case study all demonstrate capability in terms of working out the best approaches to implement Priority 1 in their own contexts. In spite of this, there were common challenges, amongst which funding was the most prominent one, as well as the limited availability of support from TI-S. The team supporting ALACs at TI-S was de-prioritised prior to 2017 but as of yet, this has not affected the ability to operate in any of ALACs under review. On the one hand, this may be positive in that it shows enough capacity within the Chapters and ALACs to manage on their own, which is a sign of resilience and sustainability. On the other hand, it suggests that the ALACs may not be well reflected as a priority within TI-S.

The case of Bangladesh highlights that ALACs who deal with high level corruption face safety risks at the level of the actual organisation and at the level of individuals working for the ALACs as handling cases involving high profile people led to a hostile relationship with parliament. This posed security risks for those working on those cases, including warrants for arrest and threatening to close down the TI Bangladesh Chapter. These kinds of risks are higher in countries where there are no protection laws for whistleblowers- Zimbabwe is a case in point. However, in the case of Zimbabwe, this risk is reduced because the ALAC focuses on petty corruption and does not deal with high level corruption. In a context where high level corruption is rampant, an approach that is limited to petty corruption may further delay the eradication of corruption. However, given the impact of the external environment on the work of the ALACs, it may indeed be more sustainable to use the petty corruption cases to *create public demand for accountability* from the ground-up, using the limited space provided. To that extent the approach used by the Zimbabwe ALAC is more sustainable in contexts in which governments are known to crack down on civil society organisations that challenge them openly. When addressing grand corruption in a context such as Ghana, where the press is able to operate relatively freely

and there is an independent judiciary, a more activist approach might be beneficial, as was expressed by other CSOs operating in the same space in Ghana.

The Pakistan ALAC engaged in community based dialogue to expose corruption, adopting a grass roots level approach in which community members presented petitions to the local government as in the case of Papua New Guinea. Such a strategy puts the public at the forefront so that the ALAC is not seen as the champion of the anti-corruption movement but rather, as simply supporting a public-driven movement. Such an approach helps to run the ALAC safely. Focusing on mediation rather than on filing complaints, as in the case of Ghana, also protects the ALAC and its staff.

The positioning of and ALAC therefore, and the way the ALAC is perceived by local institutions who may also be perpetrators of corruption, is important. When the ALAC is perceived as an adversary, it limits the safety of its clients and impacts negatively on the priority contribution area of supporting *the creation of safe mechanisms for victims and witnesses of corruption to denounce corruption and seek redress*. The creative and contextualised approaches of implementing the People and Partners priority through ALACs are therefore important if the priority contribution area of creating safe mechanisms for victims and witnesses of corruption is to be achieved. At the same time, as a means to collect information for combating Grand or other systemic forms of corruption, the ALAC might in some cases be put to better use if it is more vocal about specific cases.

Case Study: Grand Corruption

Topic & why it was selected

Grand corruption happens when ‘a public official or other person deprives a particular social group or substantial part of the population of a State of a fundamental right; or causes the State or any of its people a loss greater than 100 times the annual minimum subsistence income of its people; as a result of bribery, embezzlement or other corruption offence’¹⁵.

TI first started to focus on Grand corruption in 2011, when discussions were held during the AMM to decide whether TI should campaign to include corruption as a crime against humanity. Later, a Board working group was created to discuss and put forward a strategy on prosecuting Grand Corruption. Since then, Grand Corruption has been high on TI’s agenda, also following the full endorsement that the issue received from the Board’s strategic leadership at that time. In 2015, the ‘Unmask the corrupt’ was launched. The campaign drew on emblematic grand corruption cases to show the existence of international loopholes and to push for policy and behavioural change at the international level. The campaign was also considered a pilot to test new ways of working in the Secretariat and to introduce a cultural shift in the way the Movement does advocacy, where research should have fed into it rather than the opposite. However, due to lack of proper planning and additional funding, the campaign was ended informally after one year.

In the current strategic cycle, Grand corruption has been included as part of the TI-S Implementation Plan, under the theme Prevention, Enforcement and Justice¹⁶. A Grand Corruption Circle team has been created

¹⁵ TI’s legal definition of Grand corruption

¹⁶ “TI-S will lead the TI movement in a global effort to end impunity for Grand Corruption.”

after the restructuring process of TI-S, and the team agreed on core objectives and activities captured in a framework, that has been complemented with an annual plan with clear change markers and baselines.

Grand Corruption was selected as a cases study because it was one of the main strategic shifts in the Strategy 2020. In addition, the global effects of Grand Corruption, which often entail human rights violations and economic damage across borders, make this a relevant topic given the current political context. Finally, TI is currently the only organisation which developed a legal and layperson's definition of grand corruption and is actively advocating for its recognition at the international and national level, in addition to fighting impunity in specific cases.

Contribution of the GC to Priority 2

The work done so far on Grand corruption is highly relevant to the goals of the global strategy. This is true both at Chapter level and at TI-S through the work of the Grand Corruption team.

At Chapter level, interviews and field visits showed meaningful contributions to this priority. For instance, TI Ukraine worked extensively in the reinforcement of the anti-corruption infrastructure in the country, contributing to the development of the communication strategy of the ARMA (Asset Recovery and Management Agency) and working as a independent public supervisor of its activity. Participación Ciudadana, TI Dominican chapter, is advocating for disclosure of open data on public procurement and work closely with civil society and journalists to held government representatives accountables.

At TI-S, the GC team is working with the UNCAC coalition Coordination Commission, pushing for the inclusion of victims remedies for grand corruption and for recognition of the importance of measures against it. The team has developed an advocacy strategy to close national and international loopholes and to recognise grand corruption as an international and national crime. The document has been approved by a group of 16 chapters. Recently, the European Parliament adopted a resolution on corruption and human rights in third countries where TI language has been widely employed. Both the public release of Paradise papers and the Azerbaijan laundromat case helped in creating a favourable media attention around grand corruption and resulted in TI targeted advocacy actions aimed at starting a full investigation process on Council of Europe members.

Additional significant contributions to the strategy can be also found in other areas: for instance, TI-S through the work of GC team - contributed in Priority one, 'People and partners', under action b. 'Engaging partners and inspiring leaders'. It is teaming up with a network of journalists tackling grand corruption (OCCRP), which led to the disclosure of information related to the case of Azerbaijan Laundromat, as mentioned before. The work done in collaboration with B-team and OpenOwnership has been identified as relevant because it created opportunities but also because it resulted in the consolidation of funding streams. Most importantly however, the commitment shown by high level representatives in three countries (Ghana, Kenya and Nigeria) on beneficial ownership transparency demonstrate the potential of TI and TI chapters work in holding leaders accountable. Priority 1a 'Creating demand for accountability and empowering action' also recorded positive contributions, such as for the case of Dominican Republic. After the Odebrecht scandal, people started to for the first time in history asking for an accountable government and the TI Dominican chapter has been one of the initiator of this wide mass mobilisation against corruption, La Marcha Verde.

In Priority three, 'A Strong Movement', the Ghana Integrity Initiative has been supported in its coalition building, advocacy and analysis work. The team also supported TI Argentina's ED in becoming the C20 engagement partner and WEF young leader, promoting the growth of TI leaders and their increased presence in relevant international fora. The GC team shared articles before publication on Paradise papers with Chapters involved (Russia, Ukraine, Lithuania and UK), contributing to their ability to build on media attention for advocacy purposes. However, while these examples show good collaboration with some Chapters, this cannot still apply to the broader movement. In some cases, the work of the GC team at TI-S level seems not to be completely understood by Chapters. Our research showed two main tendencies in this regard: some Chapters are simply not clear on what are the main topics the GC team is working on and what is the rationale behind them is. Others still connect the work of GC mainly to the 'Unmask the Corrupt' campaign and either want TI-S to get back to that type of work because they feel it is relevant in their context, or have the feeling that this kind of approach does not fit with their national priorities and TI's core identity.

Case Study: Beneficial Ownership Transparency & Money in Politics

Beneficial Ownership Transparency (BOT) is the concept which aims to reduce the ability of beneficiaries of financial interests to hide their connection to these interests. Through a number of steps, countries can ensure that the beneficiaries are known, not just the legal owners or other publicised stakeholders.

At TI, beneficial ownership transparency was on the agenda before the current strategic period. TI has helped put the topic on the global agenda and had developed a checklist for TI Chapters to assess their country's level of progress towards full BOT. Under the strategy, BOT has been prioritised in a number of countries; mostly G20 countries, other European countries and in Ghana and Nigeria.

The topic was selected because it precedes the strategy, because it is an example of a global process which TI is trying to connect to the national level through the development of certain tools, which is representative for its way of working, and because it has an important relevance in Europe, South America and in some countries in Africa. Most importantly however, it is a forward looking concept which attempts to draw out linkages between different instances of corruption, which is one of the functions a global network can have that smaller organisations cannot play and is one of the core developments in the global context to which the strategy has responded. Finally, the notion of transparency is at the core of BOT, as a way to stop corrupt practices and promote good governance. This makes it an interesting case study for the relevance and risks of transparency. TI's Money in Politics work is briefly discussed here as well, since it has similar qualities and mechanisms.

To the definition problem is the role of money. Corruption is more likely to be called that in a society which does not see money as the only or primary means of trade. Similarly, direct cash transactions are rare in Western democracies but corruption exists in different forms, more hidden and indirect.

Case study: Sharing what works Against Corruption

Topic & why it was selected

This case study focuses on knowing what stops corruption, and creating and sharing knowledge more general. The 2020 Strategy states that its priority areas are based on 'the context of corruption, our understanding of how change happens and our experience of how to stop corruption' (see 2020 Strategy - Chapter V

Priorities). Initial interviews confirmed that knowledge on the mechanisms of corruption, and how to combat it, is essential to TI. At the same time, it became clear early on in this review that knowing what stops corruption is easier said than done, and that the ways TI is to create and/or share knowledge is contested within the Movement; there is no agreement or common understanding on how this is currently done, or should be done going forward. As such, we considered it essential to dig deeper into the topic of knowing what stops corruption, and more broadly, knowledge creation and sharing within the Movement.

Achievements against the strategy

Under the Strong Movement Priority, the Strategy 2020 defines as first sub-priority 'a. Sharing what works to stop corruption' with as envisioned change 'An increased body of knowledge of the interventions to stop corruption is readily available, focusing on what has worked and enabling the sharing of expertise', stipulating the following action: 'We will facilitate needs-based knowledge sharing within and outside the Transparency International Movement'. Respondents to the survey on this topic are positive: approximately 40% responds that the body of knowledge has increased, and another approximate 50% responds that it has somewhat increased. When respondents are probed about the investment in understanding what works to combat corruption, responses are quite negative; only an approximate 20% states that there is substantial investment in this.

As for the contribution of TI-S to this strategic priority, the Implementation Plan stipulates the following: 'TI-S will advance our collective understanding about what works to stop corruption and support our TI global priorities with action-oriented research'. Interviews and desk review did allow to obtain a broad understanding of TI-S's explicit contribution to this priority. First, the Research & Knowledge team continues TI's global Corruption Perception Index, Global Corruption Barometer work and other diagnostic and documentation tools. Similarly, it takes on new research activities, such as shadow reporting against the Sustainable Development Goals. The Help Desks, as well as the Regional Advisors, are furthermore clearly pivotal in sharing knowledge within the Movement, and tools produced and made available by TI-S are generally highly appreciated.

In addition, in line with the ambition of the Strategy 2020, the Research & Knowledge team has started a first series of evaluations that specifically target understanding what works to combat corruption: research into the assumptions underlying TI's approaches, and working towards an evidence-based approach. Similar as to other teams within TI-S, achievements were challenged by internal restructuring and loss of team members, funding limitations etc. Still, these evaluations are a very explicit realisation of this Strategy's objective.

Furthermore, the inclusion of impact monitoring into the global Strategy 2020 aims to create a greater evidence base. The impact monitoring has been used to compile impact reports for the years 2016 and 2017, but it is seen by many overly complex and time-consuming. The concept of programming and reporting against impact is a shift that has not happened fully across the Movement. There are instances - Chapters - that are fully on board, whereas others maintain output and outcome reporting on the basis of specific programming. The first seem to be in the minority.

The survey furthermore shows that sharing of knowledge within the Movement can be further improved. At the TI-S, there is at times insufficient information about what research, knowledge and experiences is

available within the Movement - as that information does not always reach them. The Regional Advisors and Help Desk play pivotal roles in the sharing of knowledge and research within the Movement. As for Chapters sharing knowledge amongst themselves, this is linked to how well and how regularly they collaborate and keep contact between themselves. There are at times strong regional links that guarantee a good direct knowledge sharing. Equally important, thematic sharing also takes place between Chapters. Both can however be reinforced, and possibly actively stimulated by the Movement. Chapters see great benefit in this.

Contribution of 'Research and Doing what works' to the 'A Strong Movement' priority

What came out strongly overall, is that TI sets itself apart from other organisations by basing its actions on a thorough documentation of corruption and understanding the mechanisms of it. Knowledge creation and sharing is seen as essential to how the Movement works, and is seen as rightfully prioritised in the Strategy 2020. In terms of knowledge creation, the well-known tools and approaches used widely across the Movement - such as NIS, CPI, GCB etc - are highly appreciated and felt as essential to underpin programme strategising as well as providing content and substance to advocacy activities (besides the many research initiatives undertaken by separate Chapters). The research on corruption opens up the topic, it brings transparency to it and as such allows for a more targeted discussion and action. There is a general sentiment that these activities are to be continued for TI to remain TI. In the interpretation of many who participated in the review, TI used to be more of a 'think tank', and some promote a future - at least for TI-S - role as a 'knowledge broker'. The most common opinion found is to maintain the nexus knowledge/ research/ understanding - action. Thereto data can be collected by TI itself, and external partners or other sources of data can be consulted.

Who or what determines TI's research agenda was discussed in a Focus Group Discussion and several interviews. Funding opportunities are considered critical for most of the Movement. Where funding lacks, this is mediated by adding knowledge creation - or at least data collection - onto other programmes; and finding partnerships and donors open to specific research / data queries. Still, funding limitations are real in terms of what the Movement can do. Besides that, context-specific issues and interests determine the Chapter's ambitions in terms of knowledge creation; as well as opportunities from the global level that match these interests. Largely Chapters welcome the tools and approaches that are made available within the Movement world-wide, even if some could do with an update. Furthermore, the determination of the research agenda is intrinsically linked to understanding how corruption and the environment in which TI works changes. And this, in turn, is highly contextual.

Several research areas were mentioned that TI should focus on more, mainly on the enablers of corruption and closely linked to that, context-specific mechanisms of corruption - in particular where corruption is in effect the form of governance. There is a general feeling that contextual understanding is not sufficiently high on the radar of the Movement, and reflected in the Strategy and its priorities.

In general, there is substantial production of knowledge and expertise within the Movement as whole. The area that can be improved is the access to this knowledge across chapters and the practical application of the produced knowledge. The following figure confirms once again that cross-chapters knowledge sharing is indeed one of the most appreciated aspect that respondent deem important to strengthen. Over 19% of the

respondents stated that the exchange of knowledge across chapters should be considered a priority in the next strategy in order to strengthen the Movement.

It is undeniable that knowledge creation and sharing has suffered from internal changes at the TI-S, alongside all other aspects of the Movement. There is a feeling of lack of continuity at the TI-S, and a loss of expertise because of it. Often interviewees refer to the tools of TI-S, as if the continuity that lacks in staff and organisation of the TI-S has been or was partially compensated for by the continuity of the tools. This cannot last however, as these tools need continuous reflection, renewal and replacement. Not necessarily all produced by TI itself, but at least collected, processed and made available by TI.



ANNEX II: METHODS OF THE REVIEW

The reviewers have deliberately focussed the review on more high-level strategic issues, following discussions with TI's leadership as well as our own assessment, resulting from the data collection, of what is most useful for TI at this point. Applying a focus is also a necessity as an evaluation of the effectiveness of the whole Movement on all strategic objectives, was simply not possible within the scope and time constraints of the project. However, we have aimed to add additional granularity and depth of understanding through our case studies.

This report also tries to move beyond the sometimes heated rhetoric we have heard from people within the Movement during the interviews and through other data collection methods. While the tensions in the Movement which lead to this are understandable, we think that a continuous focus on them is unhelpful. Therefore, we have attempted to separate issues of perception or communication, substantive differences within the Movement and those operational or organisational concerns that were frequently mentioned.

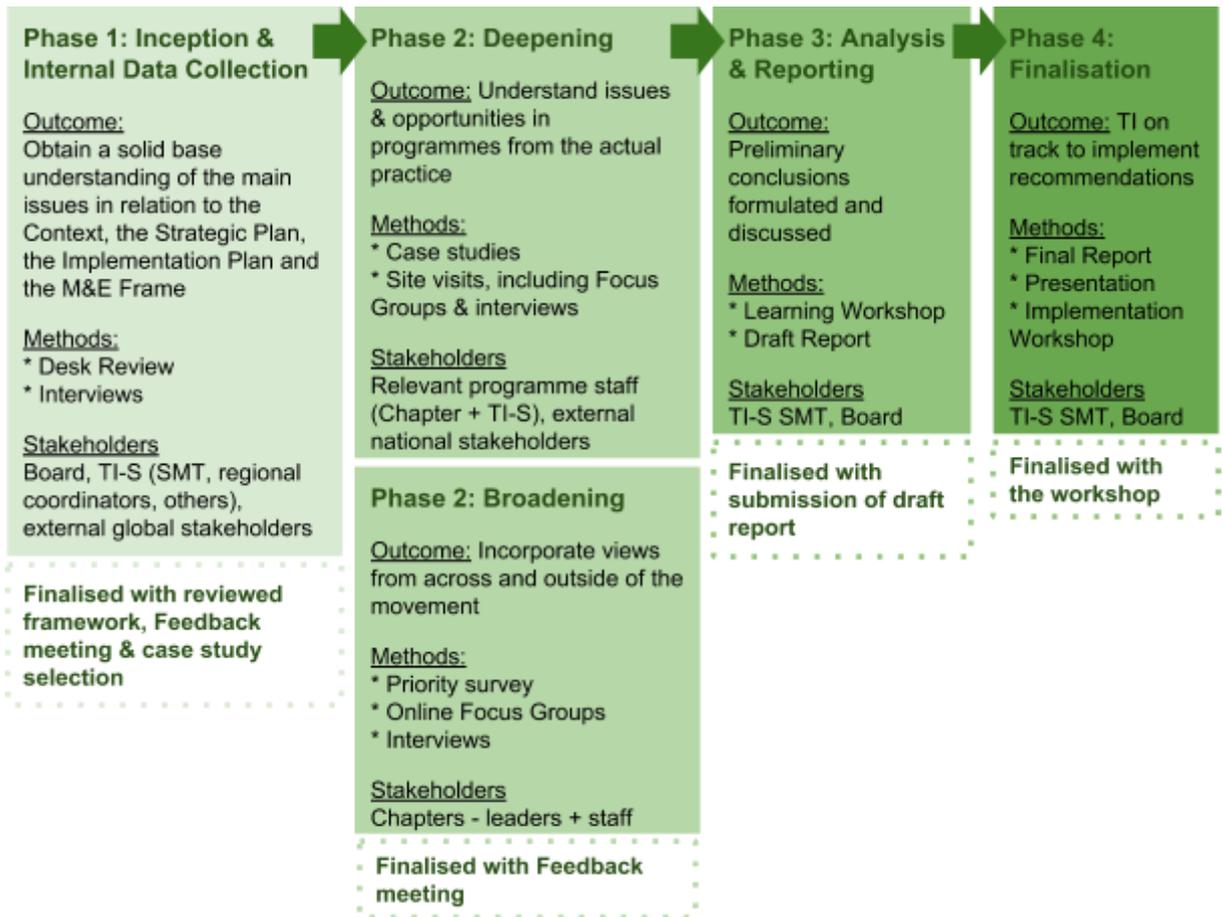
Context of the review

The review is of the Movement Strategy, not of TI's Secretariat, its Governance or of its Advocacy approaches. The last two - TI's governance and its advocacy work - are subject of two separate reviews. The three reviews are conducted independently but linkages have been explored through the sharing of information with the other review teams. However, this review is an independent assessment and any convergence between the different reviews will be explored on the basis of complete versions.

The timing of the review is somewhat delicate. Many organisational changes and challenges in the past three years have impacted the perception of the strategy of many of those interviewed for this review and that may distort their view on the relevance of some objectives. At the same time, TI-S is currently entering a new build-up phase and this review could yield valuable insights for that.

Methods

The following chart gives an overview of the methods as applied in the different phases of the project. The scheme was produced after the inception briefings in June, for the purpose of the board meeting that took place during the initial stages of the review. Taken together, these activities resulted in a number of different data sets on the perception and activities of the Movement. From these data, the reviewers have built a master matrix with an overview of the contributions of the different actors in the Movement, to the various objectives. However, since the information is not consistent and the formulation of the objectives in the Strategy - Priorities and Outcomes - is broad, that master matrix is not complete for the whole Movement and every objective. The information in the matrix is therefore not quantifiable but has served as the basis of our qualitative analysis.



- For the desk review, over 600 documents were collected from TI-S, Chapters and external sources.
- We conducted around 120 interviews with members of different parts of the Movement, either individually or as part of a roundtable discussion¹⁷.
- Based on findings emerged from phase 1 we selected the following 4 topics for case studies: ALACs, Beneficial Ownership Transparency, Grand Corruption, Research and Evidence-Based Approaches
- Three focus groups were held to address: External environment, A Strong Movement, Evidence-based approaches & tools.
- A three-step survey was conducted among the whole Movement, including all staff, in English, Spanish and French. The first short survey aimed at understanding how members of the Movement relate to the 2020 strategy, the second focussed on priorities 1 and 2 of the 2020 strategy and in week 3, the survey focussed on the Strong Movement Priority.
- Two site visits were organised to allow the reviewers a more in-depth view on the perspective and work of Chapters, to Ghana and the Dominican Republic.
- The reviewers were also present twice at TI-S premises in Berlin to collect data and receive briefings
- The information collected (interview results, TI and ODS surveys, Chapter surveys and focus group results in particular) has been used to build a matrix which provides an overview of which elements of the strategy were implemented in which part of the Movement to which extent.
- In addition, we regularly discussed the project's progress with the team at TI-S overseeing this part of the mid-term review.

¹⁷ A full overview is provided in Annex V

Limitations

In the course of the strategy review, the project team encountered the following challenges we had relatively limited time (mid-May to end of August) to review a large and complex worldwide strategy, analyse the data and produce the report. To mitigate this limitation, we designed different data collection channels to collect as much information as possible in the available time. Another challenge was that despite the fact that the three surveys were open for more than one month, they response rate was limited. The data gave useful insights, however cannot be considered sufficient to be representative. Furthermore, the reviewers should have emphasised more the need for structure in the information received. The reviewers were granted access to TI's cloud system and were able to consult all relevant documents but should have ensured that these would have been organised before starting the desk research, as the volume of these documents required a substantial amount of work to process. Finally, this is a draft report and during the drafting process, we identified a small number of gaps in our data. We will address those gaps by conducting a small number of additional interviews in preparation for the final report.

Timeline & Project Team

The review took place between June and October 2018. Data collection was finalised mid August, after which the data analysis led to a draft submitted for the Board Meeting on the 15th of September. Based on comments received, this full draft was produced for the Movement.

ANNEX III: STRATEGIC GOALS

Priorities	Change	Activities
PRIORITY 1: PEOPLE AND PARTNERS		
a. Create demand for accountability & empowering action	People around the world denounce corruption and take increased action to confront it by demanding transparency, accountability and integrity	Reaching out to specific groups of people (Activists, young people, women and those engaged in social movements)
		Support those who experienced corruption, by enabling them to denounce
		Cooperate with those who investigate and expose corruption: Journalists
b. Engaging partners and inspiring leaders	Growing number of key partners and leaders drive anti-corruption progress	Individual experiences are used to drive changes in policy and behaviour
		TI will establish partnerships with Social Movements, NGOs and NGOs Networks (young people)
		Work with leaders in public and private sector
c. Protecting anti-corruption activists	Greater freedom of action and voice for anti-corruption activists	TI will work with others to address corruption through the human rights system, share TI expertise
		Upgrade preventive and responsive measures to protect staff/members/volunteers
		Expand risk assessment, security and safety efforts
PRIORITY 2: PREVENTION, ENFORCEMENT AND JUSTICE		
a. Promoting prevention and enforcing anti-corruption standards	Public and private institutions implement the highest transparency, accountability and integrity standards to prevent and confront corruption	Advocate for access to information and usable open data
		Work with citizens and Civil Society to demand accountability
		Actively propose measures to strengthen anti-corruption capacities / push for systemic change
		Work with business leaders, regulators and consumers to ensure a clean business environment
		Promoting best practices in private sector
		Strengthen corporate anti-corruption systems and prevention mechanisms
		Advocate for financial centres to stop flow of corrupted capital
b. Achieving Justice: ending impunity for corruption	The corrupt are increasingly being held to account and punished	Partner with expert organisations to set a financial sector reform agenda
		Monitor countries' abilities to deliver justice
		Propose measures to strengthen capacities
		Provide people with innovative tools (such as social sanctions)
		Encourage action by relevant international bodies to prosecute cross-border criminals
		Denounce corrupt global networks and individuals
		Collaborate with journalists and whistleblowers
PRIORITY 3: A STRONGER MOVEMENT		
a. Sharing what works against corruption	An increased body of knowledge of the interventions to stop corruption is readily available, focusing on what has worked & enabling the sharing of expertise	Pursue research for action
		Use technology to share knowledge more effectively
		Make knowledge more readily available
b. Building a sustainable movement	The Transparency International movement is professional, sustainable and leads by example	Facilitate exchange and trainings
		Create opportunities for capacity building activities
		Invest in risk management systems to strengthen chapters' resilience
c. Ensuring the relevance of the movement	Transparency International serves as the point of reference on corruption issues in key countries, notably the G20 countries, BRICs and MINTs	Strengthen TI's presence in strategic countries
		TI will address governance issues that prevent the establishment on countries with restricted freedom of action
		Enhance regional advocacy presence expand chapter- led global initiatives



ANNEX IV: BIBLIOGRAPHY

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ANNEX V: CHAPTERS & PROJECTS REVIEWED

Chapter led

TI - Chapter	Strategy reviewed	Interviews	Round table	Survey	Field visit	Project(s) and thematic areas reviewed
Argentina	Yes			Yes		Monitoring the use of public resources for election campaigns, Learning and Leadership for incidence in Argentina,
Armenia	Yes					Corruption risk assessment; Capacity building of youth
Australia	Yes			Yes		
Austria	Yes					
Bahrain						Spreading Integrity & Transparency culture among university students, Cooperation with Parliament regarding Anti Corruption Laws
Bangladesh		Yes				Building Integrity Blocs for Effective Change (BIBEC)
Belgium						Young TI
Brazil			Yes	Yes		
Burundi						Strengthening the ALAC
Cambodia	Yes	Yes				COLLECTIVE ACTION FOR TRANSPARENCY AND INTEGRITY
Cameroon	Yes					
Canada				Yes		
Chile		Yes		Yes		observatorio de justicia e impunidad, Índice de Transparencia en Partidos Políticos, Sistema de prevención de corrupción en pequeñas y medianas empresas
China						Promote prevention and the enforcement of anti-corruption standards
Colombia				Yes		
Cote d'Ivoire						Etude du NIR et mise en place d'une plateforme solide de lutte contre la corruption en Côte d'Ivoire, Campagne de sensibilisation et de plaidoyer sur la corruption
Croatia				Yes		
Cyprus	Yes					
Denmark	Yes					
Dominican Republic	Yes	Yes			Yes	All country programmes
El Salvador						Observación ciudadana a procesos de titularización, Fortalecimiento de derecho de acceso a la información pública
EU		Yes				EU Integrity Watch, European Corruption Observatory (ECO), European Beneficial Ownership Transparency, European Economic Governance integrity assessments
Finland	Yes					
France		Yes				
Georgia						Promoting Rule of Law and Protecting Human Rights in Georgia, Media for Transparent and Accountable Governance (M-TAG)
Germany		Yes		Yes		
Ghana	Yes	Yes			Yes	All country programmes
Greece						Transparency Now! (ALAC), Education on Transparency, Integrity Pact
Greenland	Yes		Yes	Yes		
Guatemala	Yes					ALAC

Haiti				Yes	
Honduras				Yes	
Hungary	Yes	Yes		Yes	Red Flag Signalling System
Indonesia	Yes			Yes	
Ireland	Yes		Yes	Yes	
Italy	Yes				Partecipa
Jamaica					Public Awareness Building Towards Legislative Reform
Jordan			Yes		Improving integrity level of public healthcare sector service delivery, through CSO engagement, Women in Leadership, Political campaigns financing, Public finance integrity and ALAC centers
Korea					Youth Integrity Education and Campaigns, Private Sector (Business) Transparency, Public Sector Engagement
Kosovo					National Integrity System Assessment, Increasing Efficiency and Transparency of Public Procurement System, ALAC
Kuwait	Yes				
Latvia	Yes				Whistleblowers protection legislation, School for democrac
Lebanon	Yes				LEBANESE ADVOCACY AND LEGAL ADVICE CENTER (LALAC), MEDICAL ERROR ACCOUNTABILITY, Youth Coalition for Transparency
Liberia	Yes				
Lithuania			Yes		
Madagascar	Yes		Yes	Yes	
Malaysia	Yes			Yes	Speak up Against Corruption
Maldives				Yes	
Mali					Redevabilité dans la gestion des ressources des collectivités territoriales
Mauritius	Yes				
Moldova			Yes		
Morocco	Yes			Yes	Anti corruption observatory and the Promotion of Transparency, Access to information and transparency of the tax system
Mozambique	Yes				
Nepal					Building National Integrity In Nepal (BNIN), South South Exchange Program (SSE), Promoting Ethical Culture (PEC), ALAC
Netherlands	Yes				
New Zealand				Yes	
Nicaragua	Yes				
Niger	Yes				
Nigeria	Yes			Yes	Raising Women's Voice against corrupt practices through multiple taxation in the Nigeria
Norway	Yes				
Pakistan			Yes	Yes	Anti Fraud Hotline Project, Advocacy & Legal Advice Cente Public Procurement Monitoring
Palestine	Yes			Yes	Enhancing Integrity, Transparency and Accountability in the Palestinian Society
Panama		Yes			Red Nacional de Jóvenes por la Transparencia, Panamá Transparente
Peru		Yes			
Portugal	Yes	Yes			
Romania			Yes		
Russia					Monitoring of conflict of interest, Declarator.org, Ethics of non-profit sector in Russia, Corporate ethics in Russia,

Rwanda					Informing and engaging Rwandan citizens to prevent and fight against corruption
Senegal	Yes				
Serbia					Anti Corruption Legal Advice Centre (ALAC)
Sierra Leone	Yes				
Slovakia					Open Courts, Transparent Healthcare, Transparent local government, Transparency state and city-owned companies
South Africa	Yes	Yes	Yes		
Spain	Yes				PLATAFORMA de PARTICIPACIÓN CIUDADANA, COMISIONES POR LA TRANSPARENCIA Y CONTRA LA CORRUPCIÓN, COMISIÓN DE INTEGRIDAD EN EL SISTEMA FINANCIERO Y EN LOS BANCOS
Sri Lanka			Yes	Yes	
Sweden	Yes				
Switzerland	Yes				
Taiwan		Yes			
Tanzania				Yes	
Trinidad and Tobago	Yes				
Tunisia					Local watchdogs for accountability
Turkey			Yes	Yes	
Uganda				Yes	
UK	Yes	Yes		Yes	
Ukraine		Yes			
USA	Yes	Yes			Promoting enforcement of the OECD Anti-Bribery Convention
Venezuela				Yes	
Vietnam	Yes				Transparent town, Improving anti-corruption legislation and enforcement, Youth Integrity, Business Integrity, OGP
Yemen	Yes				
Zambia	Yes				
Zimbabwe	Yes				

TI-S led

Project run by TI-S in 2018; those reviewed in green

Cross Cutting Projects and Programmes

Supporting Citizens in Fighting Corruption in the Western Balkans

Transparency International's Asia Pacific Regional Programme: Effective and Accountable Governance for Sustainable Growth

TI Vietnam Programme - Empowering Youth in Promoting Integrity in Vietnam

Increasing Governance Effectiveness in Vietnam through the Open Government Partnership (OGP)

Tackling Inequalities in West Africa through Transparency and Accountability

EC Framework Partnership

Mining for Sustainable Development

Integrity, Mobilisation, Participation, Accountability, Anti-Corruption and Transparency (IMPACT)

Transparency in Eurasia

International Action Against Corruption (IACT)

People and Partners Projects

Whistleblower protection in Europe

Integrity Pacts - civil control mechanisms for safeguarding EU funds, Phase 2

A Transparent, Accountable and Effective Judiciary: Combatting Corruption and Organized Crime in Montenegro

Strengthening local governance in the Maldives: capacity building of local councils and empowering citizens for social accountability

Land and Corruption in Africa Programme

REDD+IN - REDD+ Governance and Finance Integrity for Africa

Turning up the Pressure: Tackling money-laundering through multi-stakeholder approaches in ECOWAS countries

UNODC CRIMJUST

Global Climate Finance Integrity

Anti-corruption in focus: Thematic Leadership for the OGP

Prevention Enforcement and Justice

Strengthening National Integrity Systems in the Western Balkans and

Turkey and tracking developments of anti-corruption efforts

Collective Action for Clean Business

Engaging business in the advancement of global standards to stop corrupt money flows

Global Anti-Corruption Consortium

Assessment of IMO Governance

Strong Movement

Anti-Corruption Helpdesk and knowledge services

IACC 2018 Game Changer Initiative