

# Mid-Term Learning Review of TI Integrity Pacts: Civil Control Mechanism for Safeguarding EU Funds Project

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*Final Report | Brussels, 26 November 2018*



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## EXECUTIVE SUMMARY

### Introduction

This report constitutes a midterm learning review (MTLR) of the Civil Control Mechanism for Safeguarding EU Funds Project, otherwise known as the IP Project. It is coordinated by the Transparency International Secretariat (TI-S) in Berlin.

Integrity pacts are tools which bring together a number of actors (civil society, contracting authorities and private sector contractors) who agree to adhere to transparency, fair competition and good governance in public procurement processes.

The MTLR was designed to respond to a series of questions on the relevance of the project design and Theory of Change (ToC), the effectiveness of the implementation and the project's contribution to intended outcomes, and the efficiency of project implementation.

### Relevance

The IP Project is enabling of the general and specific objectives. The IP Project's design is relevant and enables IP partners to test and understand how IPs can be used in working towards transparency and accountability, enhancing trust in authorities and government contracting, contributing to a good reputation of contracting authorities, and to the realisation of better projects.

The overall ToC aims to be adaptable in the face of complexity, allowing for feedback loops between cause and consequence. Nonetheless, the overall ToC in its current form does not explicitly connect linear or non-linear causes and effects between outputs, and short term and intermediate outcomes. Each monitoring partner has adapted the ToC to their context.

### Effectiveness

As of October 2018, each of the monitoring partners has signed an IP or a Memorandum of Understanding (MoU) with the intention of signing an IP with a CA and/or a contractor. There have been delays in signing IPs and in the implementation of the project across some targeted countries. These delays relate to changes in political command, changes in relevant civil servants' positions, changes in selection committees, halted procurement processes, amongst other reasons. Nonetheless, progress towards meeting short-term and intermediate objectives has been reported by some IPs in targeted countries, but progress has not been even across the board, although anticipated outcomes are not meant to be uniform across targeted countries.

There are few indications that this project contributes substantially to the systemic change and improvements, which TI seeks to achieve. At the same time, it is too early to draw final conclusions

There are a number of lessons learned from the process. The value associated with the pre-tendering phase is considerable, as it contributes towards building understanding of the IP and developing a good working relationship with the CA. Furthermore, the external environment and (political) will of contracting authorities in countries in which IPs are implemented is crucial towards developing ownership over the outcomes. Areas concerning citizen outreach require specific knowledge and research into communities and networks in the area in which the public procurement project is being implemented. Those monitoring partners with prior knowledge of citizen engagement has so far demonstrated progress in their social accountability activities.

## Efficiency

The IP Project project team is very devoted to the project, but is not sufficiently supported by senior management. The IP Project is being implemented within budget at TI-S, with an underspend in some task lines. This underspend is partly due to the vacancies for permanent team members in the IP Project implementing team. However, there are delays with some IPs in targeted countries, with some signed later than expected, in the latter half of 2017 and in 2018. As such, the overall IP Project will end before some of the public procurement processes being monitored end. Given that funding will end at this point, monitoring partners will be in a position where they will need to decide between ending their monitoring activities, or continuing these activities without resource. The monitoring, evaluation and learning frameworks are appropriate for the project and provides TI-S with the opportunity to learn lessons based on the IP Project implementation.

We found an overconcentration on processes and reporting, while support for implementation of the project could have been better developed.

## Recommendations

The MTLR team has formulated a series of recommendations for TI-S and monitoring partners:

- Implementation of recommendations on improving public procurement governance, standards and corporate policies should be closely followed
- TI-S should be more proactive in arranging for more frequent communication and interaction amongst monitoring partners, particularly given its information advantage.
- Monitoring partners should solicit feedback from affected communities on their engagement activities
- Monitoring partners who have yet to engage communities should develop concrete plans with TI-S
- TI-S should lead a post-MTLR after action review with monitoring partners
- Communications capacity needs to be further developed, particularly for the TI-S team and the monitoring partners
- TI-S should perform a detailed cost-effectiveness exercise with monitoring partners
- Given the costs of monitoring and the importance of maintaining momentum on the experiment, TI-S should request an extension from the European Commission
- The overall Theory of Change should be further detailed by TI-S

- The TI-S IP project implementing team should map out its strategic objectives related to the IP project

## 1. INTRODUCTION

This report constitutes a midterm learning review (MTLR) of the Civil Control Mechanism for Safeguarding EU Funds Project. The project is implemented through integrity pacts (IPs) and henceforth will be called the IP Project. It is coordinated by the Transparency International Secretariat (TI-S) in Berlin.

Integrity pacts are tools, initially developed by TI, designed to reduce corruption in public procurement by bringing together contracting authorities (CAs) and bidders in an agreement to ensure good governance, transparency and fair competition in public procurement processes from the pre-tendering phase through to delivery of works, goods and services. To bolster accountability in IPs, a neutral third party (e.g. a civil society actor) monitors compliance with the integrity agreement.

The learning review was conducted by ODS, between August and November 2018. ODS was commissioned to assess the results and achievements of the project to date, analyse the barriers faced by the IP projects, as well as respond to these challenges, and to provide recommendations for the continued implementation of the project. The review is especially designed to identify lessons learned and to contribute to the further development and improvements of the way TI-S, TI Chapters and CSO partners and others work on this project. Table 1 outlines the MTLR questions and Table 2 describes ODS' approach to the study.

### 1.1. Civil Control Mechanism for Safeguarding EU Funds Project

TI-S manages the IP Project under Phase II of the Civil Control Mechanism for Safeguarding EU Funds, granted by the European Commission Directorate-General for Regional and Urban Policy. The project includes 17 different IPs implemented across 11 EU member states, spanning a number of sectors. Each of the IPs is designed by a civil society organisation (CSO) through negotiations with CAs. The IP Project's ambition can be characterised by the objectives outlined in Box 1 below.

#### Box 1. General and specific objectives of the IP Project

##### General objective

To explore and promote the use of Integrity Pacts for safeguarding EU funds against fraud and corruption, and as a tool to increase transparency and accountability, enhance trust in authorities and government contracting, contribute to a good reputation of contracting authorities, bring cost savings and improve competition through better procurement.

##### Specific objectives

- Specific objective 1: Ensure integrity and accountability in 17 projects co-financed by EU Structural and Cohesion Funds
- Specific objective 2: Ensure transparency and access to information in 17 projects co-financed by EU Structural and Cohesion Funds
- Specific objective 3: Draw lessons from this pilot for future replication and mainstreaming of Integrity Pacts

The IP Project is a pilot project and aims to gather and explore data to determine if, how, and to what extent IPs can be used to improve public procurement processes. The geographic and sectoral scope of the overall project provides opportunity to test the IP mechanism under a variety of conditions.

The project’s rationale lies in the importance for citizens of clean and fair contracting, in the substantial sums of money involved in public procurement to the EU economy (roughly 14% of GDP<sup>1</sup>) and in finding ways to reduce corruption, which costs an estimated €120 billion annually.<sup>2</sup> The project presents an opportunity to contribute to TI’s understanding of public procurement processes and, potentially, inform strategic decision-making to improve public contracting. Furthermore, the IP project is a practical opportunity for TI-S and TI Chapters (as well as other civil society partners) to build partnerships and raise awareness of anti-corruption practices in the public and private sectors, as well as to gain expertise in public procurement.

## 1.2. Mid-Term Learning Review of IP Project

### MTLR questions

The MTLR responded to a series of questions relating to relevance, effectiveness and efficiency. Please see Table 1 below for the MTLR questions.

Table 1. MTLR questions

Relevance	<ul style="list-style-type: none"> <li>■ To what extent is the project’s design consistent with and enabling of the overall project’s ambition (as stated in the general and specific objectives)?</li> <li>■ Is the (later developed) Theory of Change realistic and sound? How realistic and useful is the project’s theory of change, including when it comes to accounting for the roles of the diverse stakeholders (from public to private sector, from CSOs to the media)?</li> </ul>
Effectiveness	<ul style="list-style-type: none"> <li>■ Overall, how effective has the project been, in the respective national contexts, in enabling the general and specific objectives (above), and in overcoming contextual and policy factors? To what extent has the project contributed (or not) to the envisaged short-term and intermediate outcomes as identified in the project’s ToC?</li> <li>■ What are the most promising results that have been achieved so far and why? And what are the results that are less promising and why?</li> <li>■ To what extent is the project likely to contribute to public procurement processes that deliver value for money?</li> <li>■ What are the major and most common bottlenecks and enabling factors affecting the implementation of the project and how can they be addressed; including those related to the existing national legislation/ policies. What mistakes have been made to date in handling these?</li> <li>■ What are good (context-specific) practices in terms of negotiating and designing an Integrity pact? What practices have worked less well? What are the key factors (e.g. buy-in of the Contracting Authority, the national legal context, extent to which bidders were involved/included in the IP etc.) that have influenced the extent to which strong IPs, which include ambitious clauses for the IP participants, have been agreed upon? What key lessons can be learned about how strong IPs can be negotiated in different contexts?</li> <li>■ What are the experiences of engaging in an Integrity Pact relationship before the tender process is itself launched? Have any clear benefits been realised from engaging in an Integrity Pact relationship before the tender process is itself launched? What key lessons can be learned about how to best engage in an Integrity Pact relationship before the tender process is itself launched? (including how to maximize potential benefits from this relation</li> </ul>

<sup>1</sup> [http://ec.europa.eu/internal\\_market/scoreboard/performance\\_per\\_policy\\_area/public\\_procurement/index\\_en.htm](http://ec.europa.eu/internal_market/scoreboard/performance_per_policy_area/public_procurement/index_en.htm)

<sup>2</sup> Based on 2014 figures compiled by the EU: [https://ec.europa.eu/home-affairs/what-we-do/policies/organized-crime-and-human-trafficking/corruption/anti-corruption-report\\_en](https://ec.europa.eu/home-affairs/what-we-do/policies/organized-crime-and-human-trafficking/corruption/anti-corruption-report_en)

	<p>in a case where the envisaged timeline of the underlying project procurement process is thrown off / delayed)</p> <ul style="list-style-type: none"> <li>■ What are good (context-specific) practices for setting up the monitoring component of the Integrity Pact?</li> <li>■ What practices have worked less well? What are the key factors (internal and external) that have influenced the extent to which effective IP monitoring processes have been implemented? What key lessons can be learned about how appropriate IP monitoring processes can be implemented in different contexts?</li> <li>■ What are the best practices for engaging with the private sector to get their 'buy in' to support Integrity Pacts? What are the practices to avoid when engaging with the private sector?</li> <li>■ To what extent has evidence been collected on the potential cost-effectiveness (positive, negative and neutral) of the IPs? What are good practices for demonstrating cost-effectiveness of the IPs? What key lessons can be learned about how the project can demonstrate its contribution to realizing public procurement processes that deliver value for money?</li> <li>■ To what extent has the level of government's (CA &amp; MA) IP ownership and political will proven to be an important factor that influences the effectiveness of the IP process? What have been the main challenges in terms of maintaining ownership and political will throughout the process (e.g. elections, corruption scandals, capacity constraints Contracting Authority)? How can these challenges most effectively be addressed?</li> <li>■ What are good (context-specific) practices for engaging with affected citizens? What practices have worked less well? What are the key factors (internal and external) that have influenced the extent to which citizen engagement has been effective? What key lessons can be learned about how to effectively engage with citizens?</li> <li>■ What are good practices of communicating the work of the monitor to the public? What content, formats and avenues seem to be gaining the most traction? What practices have worked less well? What key lessons can be learned about how to effectively communicate the work of the monitor to the public?</li> </ul>
<p><b>Efficiency</b></p>	<ul style="list-style-type: none"> <li>■ Is the project being implemented in an economically justifiable way under the given circumstances?</li> <li>■ Is the actual timeline of development and implementation realistic?</li> <li>■ To what extent are effective management and administration systems in place?</li> <li>■ How suitable is the current organisational structure for, and conducive of, positive progress?</li> <li>■ Does TI-S provide suitable support to the partners?</li> <li>■ Is the MEL project approach designed to support the lessons learnt aspect of the project? Is it adjusting/developing where appropriate?</li> <li>■ To what extent are the benefits of the project likely to continue once donor funding has ceased? What concrete steps were/are being taken to enhance the sustainability of the use of the IPs, e.g. those related to: National procurement legislation or lack of and resources that support the IPs' continued implementation outside the project's framework.</li> </ul>

*Methods & Approach*

This review took a multi-methods approach to understand the implementation of the integrity pacts. Table 2 below outlines our data collection methods.

**Table 2. Methods/data collection instruments and their relevance to the study**

Methods	Description and rationale
Phase I - Inception (August 2018)	
Inception briefings	On 17 August, ODS met with the TI-S Head of MEL and the IP Project team. During these meetings expectations for the MTLR were discussed, as well as the rationale for the IP project, implementation and progress to date, partners, MTLR project management and how the review team would approach the study.

Scoping interviews	During the inception phase, ODS conducted interviews with 9 individuals, including IP partners and consultants. These interviews provided insights into the project background, progress, challenges, and opportunities. These interviews also helped to enhance the reviewers' understanding of the project management and the relationships between the different actors involved in the project, as well as stakeholders' perspectives on the IP project. These scoping interviews were informative in enabling the review team to understand stakeholders' expectations for the project (and the MTLR). In addition, these scoping interviews were useful to help guide the review team's lines of inquiry for the data collection phase.
<b>Phase II - Data collection (August - October 2018)</b>	
Document review	ODS conducted a document review which informed the review team's understanding of the 17 integrity pacts, their set up and use and ways of working. TI-S provided ODS with a number of documents, including monitoring, learning, and evaluation (MEL) plans and biannual reports from each project partner, TI-S' consolidated partner reporting to the European Commission, consolidated dashboards for KPIs and non-KPIs, etc.
Key informant telephone/Skype interviews	<p>ODS spoke with a variety of partners to solicit insights, progress and experiences in implementing the integrity pact. In total we conducted interviews with</p> <ul style="list-style-type: none"> <li>■ TI-S project team members and senior staff = 5</li> <li>■ TI or civil society/monitoring partners (individual and group interviews)= 12</li> <li>■ Contracting authority (CA) partners participating in the IPs (individual and group interviews) = 9</li> <li>■ IP participant from the private sector = 2</li> <li>■ Citizens engaged through integrity pact as civic monitors = 2</li> <li>■ External actors/experts = 4</li> </ul> <p>In addition, one IP participant from the private sector responded to our queries by email.</p>
Field visits	<p>ODS conducted two 2-day field visits to TI-Italy and TI-Lithuania. These visits were selected in consultation with TI-S. During the field visits we spoke with a variety of stakeholders including.</p> <ul style="list-style-type: none"> <li>■ Civil society actors = 2</li> <li>■ Contracting authorities = 3</li> <li>■ Managing authorities = 1</li> <li>■ External interviewees = 3</li> <li>■ Private bidder actors = 1</li> </ul>
Online questionnaire	<p>ODS ran an online questionnaire for monitoring partners, contracting authorities, and bidders and contractors between 19 October-2 November 2018. The questionnaire sought to probe stakeholders on insights gathered during the interview and document review phase, and understand different partners' experience with the IP project to date. The questionnaire links were distributed to bidders/contractors and CAs by monitoring partners. We received the following number of responses:</p> <ul style="list-style-type: none"> <li>■ Monitoring partners = 6</li> <li>■ CAs = 6</li> <li>■ Bidders/contractors = 7</li> </ul> <p>Please refer to Section 1.3 for an overview of limitations.</p>
Online focus group	On 25 October 2018, ODS facilitated an online focus group with 4 monitoring partner participants. The focus group discussion focused on operational aspects of the project,

ODS reported to the TI-S IP project implementing team throughout the MTLR. We submitted a draft report on 9 November 2018, which was reviewed by the TI-S team and a selection of IP partners. The current report has taken comments from this review process into account in the final report.



### 1.3. Limitations and caveats

In this section we outline a list of caveats and limitations which apply to our data collection methods and analysis. The reader should bear the following points in mind throughout the report:

- The MTLR aimed to collect insights and evidence from a diverse group of stakeholders engaged in the project. However, the IP Project is at the mid-term stage of its implementation, and due to delays in many projects, has not yet advanced as expected. Some IP projects have not advanced so far as to enable interactions with a wider breadth of external interviewees (particularly with bidders/contractors, and engaged communities on the topic of social accountability).
- Some interviewees from contracting authorities and bidders/contractors stipulated that they were expressing personal opinions, not officially approved positions. Their remarks must be seen as a contribution towards understanding the positions of non-monitoring actors and taking these into account. It is therefore difficult to draw conclusions from these interviews on future policies or practices of the institutions for which these interviewees work.
- The online questionnaire is not to be taken as a scientific or rigorous assessment or representation of IP Project participants' experiences. First, 6 monitoring partners, 6 CAs and 7 bidders/contractors responded to the questionnaire. Secondly, ODS relied on monitoring partners to disseminate the questionnaire, with the intention of encouraging greater participation, and we do not know who was reached and who was not. Finally, of the 7 bidders/contractors who responded, only 1 was a bidder rather than a contractor. At the moment of issuing the questionnaire, 6 contractors had not yet been identified. Given the discrepancy over responses, ODS used the responses from the bidder/contractor questionnaire as reference only where responses were consistent with interview or document review data. Given each of these limitations, the questionnaire data are not presented independently, rather the data are referenced to support the interview and document review data, rather than as stand-alone evidence guiding our findings.
- It is important to note that the interviewees were selected on the basis of availability and willingness to participate in the MTLR. It is also worth noting throughout the report that projects are at different stages of implementation. Depending on their context, interviewees (monitoring partners, contracting authorities and private partners) had different experiences with the IP Project and had different experiences of the results to date, which is a consideration when triangulating the data (document review, focus group, online questionnaire) in response to the MTLR questions.

## 2. FINDINGS AND LESSONS LEARNED

### 2.1. Relevance

#### KEY FINDINGS

- The IP project design aligns with the overall objective of the IP project and the project's specific objectives are being translated into meaningful actions.
- The ToC aims to take the complexities and uncertainties of the respective IPs' situations into account.
- The overall project ToC does not explain sufficiently the connections (linear and non-linear) between outputs and outcomes or mark where desired change is beyond the lifetime of the project.
- In addition, monitoring partners have not achieved many results which help to test the ToC

*The IP project design aligns with the overall objective*

The project's design allows all monitoring partners and CAs to test and understand how IPs can and should be used. To engage with individual citizens and with media, to stimulate their involvement as monitors, to hold public authorities and contractors accountable, can help to achieve the ultimate objective of clean contracting and full transparency. We conclude that the IP project design is relevant in working towards transparency and accountability, enhancing trust in authorities and government contracting, contributing to a good reputation of contracting authorities, and to the realisation of better projects.

*The specific objectives align with the project's overall objective*

Specific objective 1: Ensure integrity and accountability in 17 projects co-financed by EU Structural and Cohesion Funds

The involvement of a monitoring partner is a useful experiment towards increasing the chance of more integrity and better accountability in the 17 projects, as it places an external check on CAs' decision-making, potentially from preparation & planning a tender, via publication, submission and selection, evaluation and awarding to contract implementation.

Specific objective 2: Ensure transparency and access to information in 17 projects co-financed by EU Structural and Cohesion Funds

Adding independent scrutiny from a monitoring partner and arranging for communication and outreach towards citizens adds relevant actions to the IPs.

Specific objective 3: Draw lessons from this pilot for future replication and mainstreaming of Integrity Pacts MEL frameworks which enable monitoring partners to capture insights and lessons learned are relevant as a tool for assessing the IP Projects' results. The project's planned regular meetings between monitoring

partners and TI-S, as well as meetings between monitoring partners, CAs and contractors to discuss progress, exchange information, address differences of opinion and capture insights on implementation are a good way to manage planning and implementation.

*The ToC is plausible and aims to take the complexities and uncertainties of the respective IPs' situations into account*

The Theory of Change (ToC) for the IP project, which was developed in 2017, is an overarching framework for all 17 IPs, and outlines the outputs, assumptions and intended outcomes. It is meant to illustrate how its final change will be reached through intermediate forms of change. The ToC is designed to be consistent with the Transparency International movement's Impact Mapping approach, which aims for change across two different areas: Policy and Institutional Change and Behaviour Change, each with their own ToC.<sup>3</sup> Each project partner is now testing specific elements of it to assess the extent to which the ToC can be validated through the implementation of their IP Project.

Given the different situations in which the IP Project is being implemented, it is positive that the ToC can respond to situational variations and allows for relevant feedback loops between cause and consequence (action, monitoring and decision-making), according to a principle of adaptive management.<sup>4</sup> The potential links between causes and effects, however, have not been clearly drawn between the different levels, i.e. between respective outputs, short-term outcomes, intermediate outcomes and overall goals. Finally, the ToC does not distinguish between change achievable within the project's life span and change beyond it.

While the IP Project's overall ToC does not always explain how outputs lead to outcomes and contribute to the ultimate change and many of the assumptions have not been confirmed or could not be verified, , the individual MEL plans do explore in more detail how the ultimate change could be realised. To illustrate, TI-Portugal has outlined its assumptions and change strategies, specifying how specific assumptions underpin each envisaged change. ActionAid, for instance, describes how its activities aimed at inserting sanctions around IP violations would encourage bidders/contractors to behave in a better manner and thus lead to strengthened trust amongst bidders, the public and CAs.

According to the monitoring partners who participated in the online focus group, it is difficult to fully test the ToC at the midterm point as many projects have been off to a slow start, and are only beginning to test their outcomes against the ToC. In addition, they experience the process of measuring progress against the ToC as both challenging and slow, particularly around creating change at the political and CA levels. Please see Section 2.2 for further information.

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<sup>3</sup> Caldeira, R., and Werner, D. 2015. Are we on the road to impact? Transparency International Monitoring Guide. Available at: [https://www.transparency.org/files/content/ouraccountability/2015\\_TIMonitoringGuide\\_EN.pdf](https://www.transparency.org/files/content/ouraccountability/2015_TIMonitoringGuide_EN.pdf)

<sup>4</sup> O'Donnell, M. 2015. Adaptive management: What it means for CSOs. Available at: [https://www.bond.org.uk/sites/default/files/resource-documents/adaptive\\_management\\_-\\_what\\_it\\_means\\_for\\_csos\\_0.pdf](https://www.bond.org.uk/sites/default/files/resource-documents/adaptive_management_-_what_it_means_for_csos_0.pdf)

## 2.2. Effectiveness

### KEY FINDINGS

- There have been delays beyond the control of monitoring partners in signing IPs and in implementation of the project across some targeted countries.
- The monitoring frameworks, and frequent contacts between TI-S and the monitoring partners have enabled the project to collect lessons learned from the implementation of the IP.
- There are substantial doubts if and which results may be replicated in future public procurement processes in the targeted countries.
- There are some indications of intended behavioural change at CA level but there are doubts about the degree to which these can be reproduced and would lead to more systemic change.
- The main enabler to implementation of the IPs is the professional relationships built between CAs and monitoring partners.

#### *Factors outside of the projects' control play an important role in meeting the general and specific objectives*

As of October 2018, each of the monitoring partners has signed an IP or a Memorandum of Understanding (MoU) with the intention of signing an IP with a CA and/or a contractor. The Effectiveness Matrix in Annex I provides an overview of each monitoring partners' experience in implementing the project along a number of criteria.<sup>5</sup>

Progress towards the IP Project's objectives has been slow, uneven and in some cases non-existent. Each of the projects work within the confines of their respective sociocultural, political, economic and legal systems. Some monitoring partners have been unable to actively participate in the pre-tendering phase, or have been unable or unwilling to engage with all aspects of the procurement process. The reasons for this include not having the requisite accreditation to review confidential material at the required moment (e.g. SBF), fear of being compromised in the evaluation of bids (e.g. TI-Lithuania), or the perceived or real legal barriers to participate in the evaluation of bids (e.g. TI-Romania, RAS). Furthermore, project progress has been slow because public procurement procedures are complex, lengthy and subject to unexpected changes. In some cases, Contracting Authorities and Contractors have demonstrated unwillingness to really cooperate with the monitoring partners.

Even where there is a clear willingness of public administration and civil society to work together, we have found delays in implementation due to a number of factors, such as changes in political command, changes in relevant civil servants' positions, changes in selection committees, documents being unavailable or inaccessible, documents needing correction or amending, halted procurement processes, changes in chosen procurement objects and changing contractors. In practice, this means most projects have not or have only now reached the stage of delivery of the works, goods or services. It also means that, where monitoring partners have not seen opportunities or ways to engage citizens before delivery, this engagement still needs

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<sup>5</sup> Effectiveness criteria include: design of integrity pact, value of IP relationship pre-tender, monitoring activities, engagement with the private sector, political will and ownership, citizen engagement, public communications.

to be organised. Over the course of the MTLR, based on interviews and monitoring partners' reports, it became apparent that the majority of monitoring partners have not yet formulated plans for the social accountability portion of the work, or articulating their anticipated approach.

On the basis of these experiences and delays, the effectiveness of the IPs and the progress towards the ultimate objectives are difficult to assess. At the same time, during these sometimes long processes and intense interactions, many lessons have been learned. This can be considered as important progress and in this respect the project has effectively delivered results.

*The project is showing some signs of contributing to the short term and intermediate outcomes*

Table 2 below outlines how the IP project has contributed to short-term or intermediate outcomes linked to the IPs under implementation. Two of these outcomes are further detailed in case studies later in Section 2.2. The information used in this section comes from monitoring partners' reports, the TI-S consolidated reporting to DG Regio, consolidated partner logs, the online questionnaires, online focus group and interviews.

When assessing the intermediate outcomes, the MTLR team can only report on recommendations which monitoring partners report to be adequately taken up, but cannot make any statement, as of yet, as to the likely result of these recommendations in practice, particularly when they were not cited by contracting authorities or discussed in detail by monitoring partners.

**Table 2. Progress towards short-term and intermediate outcomes**

Short-term outcomes	
<p><b>1. Strengthened integrity capacity of targeted contracting authorities and successful bidders</b></p>	<p>The consolidated partner logs provided by TI-S demonstrate that only two recommendations were made on this point (one key and one non-key). The key recommendation which would allow the monitoring partner to attend the tender evaluation meeting as an observer was adequately accepted by the CA (SBF). According to TI-S' donor reporting, 7 project partners have reported increased integrity capacity amongst CAs. Their examples include:</p> <ul style="list-style-type: none"> <li>■ recognising that CAs understand the IP and the IP Project's objectives (Amapola)</li> <li>■ CAs considering the feasibility of recommendations related to enhancing employee knowledge on corruption related risks, enhancing awareness of an anti-corruption hotline, and a review of an anti-corruption action plan (TI-Lithuania).</li> <li>■ Building a new concept of what corruption is (TI-Hungary)</li> <li>■ Raising awareness of corruption risks linked to direct reporting (TI-Portugal).</li> </ul> <p>While these examples from the donor report indicate the monitoring partners' assessment of enhanced integrity capacity of targeted contracting authorities and successful bidders, the MTLR team has not seen baseline information to situate integrity capacity pre-IP, and it is not clear which are the defining characteristics of CAs and bidders who have demonstrated increased integrity capacity. For instance, CAs may already have adequate integrity capacity, but the procurement processes and hierarchical structures in which they work are inefficient, or they work in difficult environments, The contracting authorities whom we interviewed did not specify any growth in integrity capacity. This outcome is not intended to be uniform across</p>

	the IP participants, instead giving monitoring partners flexibility on the outcomes they could enhance.
2. <b>Strengthen prevention, detection and resolution of irregularities in targeted public procurement processes</b>	<p>According to monitoring partners' and TI-S' reporting, 10 monitoring partners have stated the detection and resolution of irregularities. In total, 7 out of 15 reported irregularities reported in the planning phase were resolved, and 1 in the implementation phase was adequately resolved. Examples of irregularities cited include the detection of one bidder participating across three consortia (TI-Bulgaria), narrow selection criteria which would limit competition (TI-Greece), and potential conflict of interest in which a family member of one of the responsible evaluators in CA unit submitted a bid (SBF).</p> <p>Monitoring partners highlighted issues and made recommendations to remedy them. Four (TI-Greece, TI-Czech Republic, TI-Slovenia, TI-Bulgaria) of the 10 monitoring partners reported satisfaction with the CA accepting their recommendations on irregularities, meeting their target indicator of 50% resolution of irregularities, 6 have not yet managed to do so.</p>
3. <b>Increased trust among targeted contracting authorities, successful bidders, and the public</b>	<p>To date the extent to which trust has been increased as a result of the IP is uncertain, given that we spoke with only three bidders/contractors. One interviewee explicitly stated that the IP instills a sense of trust in the public procurement process, while 5 questionnaire respondents (bidders/contractors) stated that the IP gives them the sense the contract was fairly awarded and that the tender process is transparent, although without any supporting reasons we cannot use these specific survey results as concrete evidence (see Section 1.3). Finally, there is some recorded evidence by monitoring partners: while monitoring partners like Action Aid and Amapola have stated that affected communities are showing signs of enhanced trust for CAs, there is no concrete example or underpinning evidence to support this claim. We conclude that it is too early in the process, and there was insufficient reach in this MTLR to determine the extent to which the IP Project has increased trust among contracting authorities, successful bidders and the public. The MTLR team concludes that additional evidence will need to be collected over time, directly from participants, in order to assess if and how the IP increased trust amongst targeted participants.</p>
4. <b>Increased good-will of targeted government authorities and successful bidders for implementing (systemic) reforms to improve public procurement processes</b>	Please see Case Study 1 later in this section for additional information.
5. <b>Increased capacity and willingness of the targeted public, especially intended beneficiaries, to engage in monitoring public procurement processes and reporting perceived risks</b>	Please see Case Study 2 later in this section for additional information.
6. <b>Increased capacity and willingness of the targeted media to oversee public procurement processes</b>	TI-Bulgaria has reported that the media has used its expert opinion commenting on the scandal over the termination of the first tender related to the IP. While it is encouraging to see that the media is using TI-Bulgaria as a source, this appears to not directly relate to efforts to enhance capacity. We have not been able to find evidence of projects

	having approached selected media in a systematic way, nor indications of an increased capacity and willingness on the side of the media.
<b>Intermediate outcomes</b>	
7. Improved enforcement of public procurement standards/policy by governments in the targeted countries	According to the consolidated partners logs, to date, 26 of the 36 key recommendations provided to individual CAs have been taken on board, and 24 of the 40 non-key recommendations made have been reportedly taken on board. Examples of key recommendations include adding non-discriminatory qualification criteria to the tenders (TI-Romania), adoption of a whistleblowing system (TI-Italy), and the removal of a requirement for bidders to create safety plans (TI-Slovenia). These results are promising signs as to the openness to better standards and policy, but we have not seen evidence of these recommendations being translated into standards and policies applicable to or applied by other CAs and at all governance levels.
8. Improved application of (corporate governance) standards in public procurement practice by bidders in the targeted countries	To date, according to the consolidated partner logs, 2 key recommendations were made, one of which was taken on board, while 8 non-key recommendations were made, 5 of which were taken on board. Examples of these non-key recommendations include standardised communications procedures between all parties and team members (TI-Czech Republic), signature of meeting minutes at the end of the meeting (TI-Slovenia). The key recommendation which was taken on board, made by TI-Italy towards the contractor, suggested that a whistleblowing system and publication of code of ethics should be adopted. These results are promising, but the MTLR team has not seen evidence of these recommendations being translated into standards and policies applicable to or applied by other CAs and at all governance levels.
9. Improved public procurement standards/policies adopted by governments in the targeted countries	To date, 3 key recommendations out of 6 were taken on board, while 1 out of 3 non-key recommendations was taken on board. Key recommendations included the development of the budget justification section of the project application (TI-Romania), that action should be taken when there is suspected price fixing on bids (TI-Italy), and that the IP is incorporated into the mandatory requirements for the bids (Amapola). While the project is at the mid-term stage, there are few examples of the adoption of improved public procurement standards where recommendations were made.
10. Improved (corporate governance) standards in public procurement adopted by bidders in the targeted countries	To date, the MTLR team came across one example of reported improved standards in public procurement by bidders: in Poland, SBF negotiated for the successful bidder to implement an ethical management and whistleblower protection policy. So far in the process, the MTLR team can only report that this recommendation was taken on board, although it is too soon in the implementation process to make any assessment as to the outcome of this recommendation, and if this has been an improved standard.
11. More transparent, participatory and accountable public procurement processes implemented by governments in the targeted countries	Monitoring partners have reported increased transparency, participatory and accountable public procurement processes implemented by the contracting authorities they work with. According to the consolidated partner logs provided by TI-S, 53% of recommendations made by monitoring partners (TI-Greece, TI-Italy, TI-Latvia, RAS) on more transparent, participatory and accountable public procurement processes reported that their recommendations were adequately taken up, falling short of the 75% target for the mid-term. However, of the non-KPIs, 67% were reportedly adequately taken up, surpassing the mid-term target of 50% (RAS, TI-Romania, TI-Greece, TI-Czech Republic, TI-Italy, TI-Latvia and Amapola).

	<p>While the data demonstrates that the mid-term target for the KPI was missed, there is a perception amongst monitoring partners, and contracting authorities that the IP has led to more transparent relationships at a micro-level, between CA teams conducting the procurement process, and the monitoring partners and the bidders. Monitoring partners have made suggestions for additional measures at CA level, such as making a recommendation for the results from tendering procedure to be published on the CA's website (TI-Italy) and the creation of an open data system to document each stage of the tender process (Action Aid). While these figures indicate that there is progress in ensuring transparent, accountable and participatory procurement processes at CA level, as of yet, there are no reports or evidence that the same processes are being put in place by national governments (at the macro-level), or transferred across the various governance levels in the targeted countries.</p>
<p><b>12. Improved integrity performance by bidders in procurement processes in the targeted countries</b></p>	<p>Overall, four monitoring partners made key and non-key recommendations to improve integrity performance by bidders. Two of the three key recommendations were taken up, including developing a corruption risk register (TI-Romania) and a request for more prompt access to information (TI-Slovenia). At the time of conducting the MTLR, the MTLR team spoke with three contractor representatives participating in the IP project. On the basis of our research, it was not possible for the MTLR team to assess the extent to which the IP Project has improved integrity performance by bidders or the extent to which these recommendations are likely to enhance bidders' integrity performance.</p>

*Building and maintaining good working relationships with contracting authorities and bidders is of great value*

While monitoring partners are independent, they must develop a close working relationship with contracting authorities and also with bidders. Many interviewees refer to the importance of creating a trusting relationship as a condition for being effective. All interviewees agree that getting to know each other, taking time to explain positions and provide clarification is paramount before negotiating the actual IP. This has proven easier if the monitoring partner can build a relationship in the planning and preparation phase or if the actors already knew each other from previous work, as this helps to build up a degree of trust with the CA. In line with the European Commission's remarks on the importance of this phase, eight contracting authorities have stated that the preparation and planning phase is crucial for procurement, as monitoring partners can pick up on omissions, mistakes, irregularities and provide recommendations from the beginning.<sup>6</sup> For instance, 15 of the reported irregularities by monitoring partners were highlighted in the planning phase of the procurement process, 7 of which were adequately resolved; while fewer irregularities were reported at later stages of the public procurement process such as the submission phase (7 irregularities reported, none of which were adequately resolved), the evaluation phase (3 irregularities reported, one of which was resolved) and the implementation phase (1 irregularity reported and resolved).<sup>7</sup> Monitoring partners saw the planning and preparation phase as an opportunity to scrutinise both needs assessments and other important documentation at an early stage and prevent irregularities this way, although not all monitoring partners had the opportunity to do so (e.g. SBF did not have enough time to gain

<sup>6</sup>Public Procurement Guidance for Practitioners, European Commission, Brussels, February 2018.

<sup>7</sup>This information came from the consolidated partner logs compiled by TI-S, based on monitoring partners' reporting.



accreditation on confidentiality procedures) or to participate in the evaluation of the tender (e.g. RAS and TI-Romania). Importantly, by being involved from the beginning it also becomes easier to establish good relations and to acquire the necessary credibility, which then helps to create a professional relationship with the various actors.

Case study 1: Increased good-will of targeted government authorities and successful bidders for implementing (systemic) reforms to improve public procurement processes

Improved public procurement can be achieved by a range of interventions and system changes: increased transparency, more and different types of scrutiny, more relevant procurement practices, preventing cronyism and nepotism, reporting mechanisms for irregularities, extending integrity requirements to subcontractors and establishing ethics and integrity standards. The government authorities involved and successful bidders can, in principle, achieve this. Therefore, it is important to understand how to work alongside the various public authorities and contractors to encourage them to become better, more open and transparent.

***Political will is necessary for the success of IPs and their outcomes***

In Slovenia, Italy and Poland some public authorities are actively engaging in transparency and integrity projects. For example, the Slovenian Ministry for Health is signing an IP with TI-Slovenia as part of a construction project in another general hospital, in a bid to demonstrate transparency in public procurement processes. In Poland, at national level there is an intention to reform procurement law, something on which SBF was providing recommendations to the monitoring authority in September 2017. In Italy, one of the CAs with which TI works intends to act upon a recommendation to report cases where different bidders submit bids with exactly the same economic value. There is also a clear motivation in Romania to use the IP as a data collection mechanism to highlight the difficulties and complexities in public procurement processes in order to push for change.

It is encouraging that CAs demonstrate a willingness to engage with IPs, and that they see their potential to positively contribute to public procurement processes. This willingness is demonstrated through the provision of documents, uptake of recommendations and regular meetings with the monitoring partners. It is also encouraging that, as one contractor did, they state that they find the IP format interesting and that they can learn from participating. Equally, it is positive if they think that their new culture of openness will be maintained after the project, as one CA did. However, while there is goodwill, it is important to acknowledge that there are differences between CAs and the degree to which they believe they need assistance with legal or technical matters. From our sample of CA interviews, one CA believed that they had the legal and technical advantage over the monitoring partner, while another believed it was crucial to include a monitoring partner to help them navigate the complexity of the public procurement process, while another commented that procurement procedures should be carefully selected to match the potential contribution of the candidate monitoring partner.

***Ownership***

The willingness of partners to generate change more widely than their current procurement process is

encouraging. However, the degree to which CAs are willing to take ownership over the results of the IP is unclear. While contracting authorities have demonstrated their willingness to engage in the IP, none with whom we spoke have stated that they are sharing the results of the IP beyond their institutional remit. However, given that IPs are in different stages of implementation, and that the project began in 2016, systemic change is not expected to have occurred as of yet.

In terms of ownership, another important consideration is the time burden of the IP on CAs and contractors, as acknowledged by monitoring partners who were cautious not to overburden their partners during the MTLR, and as stated by several CAs and contractors during interviews. If IPs are seen to belong to one partner (the monitoring partner) and not a shared project across all participants, this cannot be overlooked in considering any question of goodwill, and particularly in the pursuit of implementing reforms in public procurement,

At this point in time, systemic change as a result of IPs cannot be demonstrated, nor was it intended to have already happened at the midterm point in the IP Project. But the will to implement systemic reform may be hard to generate. The MTLR team has not yet found any indication that a majority of the CAs involved in the project has developed a sense of ownership of better procurement and of the need to actively continue to use or even promote IPs. It is ODS' assessment that the monitoring partner is proactive, and CAs and bidders are reactive. While the structure of the overall IP project requires the monitoring partner to take the lead, additional thinking is required as to how to encourage CAs to become more proactive and actively participate in the project's wider institutional ambitions as well as in wider interactions with media and citizens. This thinking could include celebrating successes or quick wins through building case studies of good examples, which could be used for promotional purposes for TI-S, monitoring partners, CAs and contractors, and communicated to affected communities and the media.

*Different partners have different motivations to participate in an integrity pact, but this does not seem to affect implementation in significant ways*

The IP serves a variety of different organisational and practical purposes, depending on the actor involved. Monitoring partners generally recognise IPs as an opportunity to learn and experiment with practices which could improve public procurement, as well as to understand how public procurement takes place in reality and where and how corruption risks occur. Some are also interested in improving their situation and/or reputation. Others are interested in being involved in the pilot project to understand how such a tool works, and to develop expertise in case IPs are replicated or scaled up. Some monitoring partners see their involvement in IPs as a deliberate move towards clean contracting and feel the need for CAs and contractors to be more accountable.

For many representatives from CAs, the decision to participate in the IP was taken at a higher level and delegated to their respective units; as such those CA representatives have not worked on IPs out of their own initial motivation. Nonetheless, many recognise that the presence of a civil society partner in the role of a monitor has pushed them to take a bigger interest in integrity issues and to be more aware of the risks in public procurement. Four CA representatives have learned to see IPs as a way to be more accountable to

and transparent towards their citizens, as well as a chance to enhance their reputation or as a way to learn to become more open, transparent and cooperative, more modern. For two contracting authorities, the capacity of the monitoring partner to identify gaps and omissions in regulation and procedures or to develop solutions has proven to be important. Finally, CAs see participation in an IP as a way to portray themselves as clean.

As for bidders, the MTLR team did not uncover any tensions or difficulties in on-boarding actual contractors to IPs. While some bidders are aware of business integrity initiatives and have mentioned that the IP can help enhance fairness in the procurement procedure, one bidder thought IP experience might produce a comparative business advantage, one bidder indicated that without tangible incentives bidders who were not obliged to would not sign IPs and another bidder even suggested to issue a certificate of participation in an IP to strengthen the business case of participating in IPs. Whether incentives in general carry a risk of undermining the good-will aspect of the IP, particularly in contexts where IPs are not compulsory as part of the IP projects, has not been looked into by the MTLR team, nor has how to have them engage with bidders.

The motivation underpinning an actor's participation in an IP - as expressed by its individual implementers - influences their commitment to making the respective parts the IP work and to overall delivery on the project's intended results. For instance, if contracting authorities and contractors declare that they are keen to learn how to be more open or demonstrate that they are acting transparently, the extent to which they are really committed is demonstrated in how timely and completely they deliver documents or other relevant information, and how open and regular their communication with the monitoring partner or the public is. While CAs and contractors engage in the IP and provide the relevant information to monitoring partners, the MTLR review team did not find compelling evidence that they have taken genuine ownership over transparency and openness in the IP processes. Nonetheless, the MTLR team found no indications that the specific drivers for participation by the different actors are considered crucial for implementation.

Case study 2: Increased capacity and willingness of the targeted public, especially intended beneficiaries, to engage in monitoring public procurement processes and reporting perceived risks

The IP project sits under the People and Partners pillar, specifically “Creating demand for accountability, and empowering action” of the Transparency International Strategy to 2020. This IP project not only recognises that communication with affected communities is vital for a number of reasons, namely it enhances transparency in the process by creating an aware (and potentially active) audience, contributes towards a legacy of active citizenship, in terms of building skills and capacity for monitoring activities. Citizen engagement, as a strategy to counter corruption, can be preventative (ensuring consistent citizen participation) or curative (through monitoring and evaluation, which requires accountability after actions have been taken).<sup>8</sup> While there are also limits to engagement, including limited capacity of citizens or civil society to engage in analysis, and reporting, lack of inclusiveness across social groups in citizen engagement activities, and ‘induced citizen engagement’ facilitated by a third party which has not had

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<sup>8</sup> Marín, J. M., & Chêne. M., 2016. Evidence of citizen engagement impact in promoting good governance and anti-corruption efforts. 2016:21. Available at: <https://www.u4.no/publications/evidence-of-citizen-engagement-impact-in-promoting-good-governance-and-anti-corruption-efforts/>

good results.<sup>9</sup> Overall, we found few examples from the MTLR which demonstrate increased capacity and willingness of the targeted public, or affected communities, to participate in public procurement processes, and good examples largely come from Italy. Nonetheless, we have found examples on how to engage the targeted public, or affected communities, to participate in public procurement processes.

#### *Innovative approaches for social accountability*

Amapola and Action Aid have made concerted efforts to incorporate citizen engagement into their IP project from the very beginning. From an early stage of the project, Action Aid mapped the affected communities, met with local stakeholders, built an interested network of citizens, of up to 20 civic monitors.<sup>10</sup> As such, they were able to build networks in local areas relevant to the implementation of public works, e.g. public restoration projects monitored by Action Aid in Sibari. Amapola engaged and trained students to develop their awareness of public procurement processes and to develop monitoring skills. However, the number of students involved (13) was too low and lasting or more structural effects cannot be expected. The MTLR team found no evidence of a continuity plan for the students participating in Amapola's project. The number of citizens involved in the ActionAid engagement strategies are higher, but interviewees suggested that these initiatives would not survive when Action Aid would stop its engagement as the project was primarily driven by Action Aid, not by the local population. Nonetheless, the citizen engagement work that was conducted by Amapola and Action Aid could serve as a template or example of how to engage communities.

#### *There are risks to success in increasing capacity of affected communities*

Without a sufficient framework, development of networks or connection to networks, it will be difficult to maintain the required level of citizen engagement. For instance, a lot of engagement has been discrete to date and relates to a specific piece of work (e.g. Amapola's work with students) Nonetheless, these cases are promising as they demonstrate that citizen engagement is feasible, particularly when a monitoring partner has a track record in this area, and can serve to establish a template which could be replicated by other monitoring partners, where appropriate.

The key take away messages for successfully engaging with citizens is to dedicate serious time, resources and professionalism to outreach and communications. This includes studying the conditions and requirements for successful citizen engagement: understanding how a particular piece of public procurement might affect citizens, undertaking a stakeholder mapping, establish how and when to raise their interest and secure their commitment, communicate extensively but in a targeted way, and mobilise them at the right moment, as per the example set by Action Aid.

Reaching citizens and building monitoring capacity requires a number of key enablers: monitoring partners need to create clear and defined plans from an early stage in their projects; monitoring partners need to staff their teams with the requisite capacities and skills (e.g. communications, public engagement, etc.). Two monitoring partners cited their physical distance from the communities in which a procurement

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<sup>9</sup>Ibid.

<sup>10</sup>TI-S internal document. Case Study: "Citizen engagement in five steps: How ActionAid Italy engage citizens in public procurement."

project is being implemented as a reason for their lack of progress on citizen engagement; however, this does not have to be a barrier. For instance, ActionAid demonstrated the importance of creating connections within communities early, even if the monitoring partner is not physically present in the community. This included planning visits and building partnerships with local groups/networks. Nonetheless, the apparent experience and expertise present in ActionAid and Amapola has enabled their activities on the social accountability strand of the IP work, something which other monitoring partners seem to lack.

Based on our interviews with monitoring partners, as well as our review of partner reports, the main barriers towards the successful engagement of citizens or affected communities includes delayed planning, a lack of expertise and experience within project teams. This was compounded by a lack of social accountability capacity at TI-S (only between July 2017 and October 2018 was there support), delays in starting projects, and the invisibility of procurement contracts, e.g. software services over public works.

### ***Lessons learned***

Monitoring partners found that outreach and communication is important to the IP project's objectives, particularly when the procurement project has started (and only if there is a clear visibility of a project), but that specialised support is necessary. As the monitoring partner you can broker the knowledge for citizens, e.g. place a billboard to outline the details of the project, with information on how to reach out, but without active engagement it will be difficult to reach the public or ensure their participation in monitoring. This is important given that the overall ToC anticipates behavioural change on the part of affected communities. With few exceptions, reaching out to concerned citizens has not yet been effective at the mid-term point. Even in cases where citizens have been engaged, there is no evidence that the involvement of the public or affected communities has brought additional information, or added value to the progress of the project. Furthermore, many monitoring partners face multiple challenges on this aspect of the project, namely, they lack skills on social accountability/citizen engagement, and their project has been delayed and it is too early to bring in citizen engagement, they were unaware of the type of project they would have (e.g. public works, services, etc.) and where it would be that that they were unable to plan out their engagement strategy early. Overall, monitoring partners tend to agree that the social accountability element or reaching out to the public is not relevant for each project. For some, outreach and ensuring buy-in to monitoring and reporting can only be done for projects with high visibility, for example public works.

While it is unclear specifically how engagement with affected communities will impact on the current public procurement processes, the underlying rationale is sound. The nature of the IP project allows different project teams to experiment and determine the appropriate course of action; as such, the project teams share a basic framework but are ultimately able to determine their course of action on the basis of need. Within this context, monitoring partners need to build confidence and become innovative in reaching out to affected communities to raise awareness and encourage their participation through innovative means, e.g. getting citizens and communities to take photos of the progress, reaching different demographics of communities (retired individuals, adolescents, local community groups, etc.).

### *Expertise is crucial for engaging in monitoring activities for an integrity pact*

Over and again, monitoring partners return to the same point: legal and technical expertise are necessary for the implementation of an integrity pact, and are crucial to the monitoring component of the IP. Without specific knowledge of the legal procurement framework and the specific works, goods or services to be procured, it is difficult to understand the details of the projects which are being monitored.

Each of the monitoring partners agreed that they were able to bring in the required content expertise to their monitoring team through hiring experts, but that it requires material resources and a time investment which would not be available without the IP project. In general, the monitoring partners indicate that funding has been a key enabler towards delivering on this IP project. Monitoring partners and external experts claimed that it would be difficult to conduct an IP on a project with a relatively small budget, or without adequate funding. Funding provides the opportunity to recruit experts and to spend adequate time for the required activities.

### *As of yet, there is no concrete evidence that IPs contribute to better value for money in public procurement*

In their reporting, monitoring partners have provided examples of recommendations which they believe will enhance value for money. But the positive, neutral or even negative implications of recommendations made to CAs cannot be fully known until the projects have progressed further as is explained below.

A number of recommendations pre-empt the potential for corruption, such as the introduction of 'no conflict of interest' declarations, the establishment of a risk register or the modification of selection criteria which may be unnecessarily exclusive to otherwise eligible bidders (e.g. TI-Romania). However, not all pre-emptive recommendations have been taken up. For instance, TI-Romania recommended that bids be evaluated across quality/price criteria rather than with the lowest price bid. However this particular recommendation was rejected by the CA; the crux of the problem came down to the interpretation of quality, and how to establish these criteria. The CA decided to evaluate based on the lowest cost bid, as it was deemed a more objective criteria.

The recommendations made for value for money in public procurement processes have been context specific. One reported mechanism for ensuring value for money is a rigorous examination of tendering documents by experts who could judge specifications and likely costs based on relevant market data. For example, TI-Hungary recognised suspicious patterns in the bidders' financial offers, recognised that they might be aware of the maximum budget, and put forward a recommendation to reduce the total sum of the contract. The CA agreed, reducing the initial maximum awarded budget by 200 million HUF. While this is notable, and can lead to success, other, external, factors can also impact on cost-effectiveness of a project, for instance, fluctuating market prices or actual availability of necessary items or workers. Monitoring activities under the IP Project will reveal if this is, in fact, a saving, or if the costs will grow from the agreed budget over time. Another way to ensure value is to be aware of potential collusion amongst bidders. In Italy, the monitoring partner flagged up suspicious bids to the relevant authorities, although one was chosen anyway. In Lithuania, part of the specifications in the tender documents seemed excessive, upon which the CA created a separate tender for the contested elements which is thought to be cost-saving.

Time, coupled with monitoring activities, will tell if and in how far the recommendations the monitoring partners have made will have had an impact on the overall price, and overall value for money in public procurement processes. Monitoring partners already provide an explanation for their rationale. The IP project represents a good opportunity to devote resource to capturing recommendations or advice to enhance value for money in public procurement, and to share this knowledge with other monitoring partners, e.g how to spot red-flags for collusion or market distortion.

*The monitoring partners appreciate a good working relationship with contracting authorities but are wary to not be seen as getting too close*

Most monitoring partners and contracting authority interviewees and questionnaire respondents agreed that they had good working relationships and that trust has developed within the context of the IP. Contracting authorities have stated their openness to monitoring partners' suggestions, but at the same time hold that they have enough experience already to implement public procurement processes efficiently.

Conversely, while monitoring partners are generally enthusiastic about the opportunity to work alongside public administration and understand the mechanics which underpin public procurement, two mentioned explicitly that they were wary of being seen to get too close to contracting authorities as it might erode public trust in their institution. To illustrate this point, TI-Lithuania abstained from attending the meeting for the evaluation of tenders, lest they be seen as endorsing one bidder over another in case problems should later arise.

*The IP Project infrastructure is useful for collecting evidence for sustaining and sharing outcomes*

At the mid-term the consolidated partner logs demonstrate that 38% of all recommendations which were made by monitoring partners have been adequately taken on board. While the results are not yet at the anticipated level for the mid-term, the IP project's infrastructure is equipped to capture evidence, insights and learning. This will prove to be a repository of knowledge which can be useful in public procurement processes, beyond the IP tool. The IP Project already has a series of ingredients to update guidance on public procurement practices, once the final results from the IPs have been taken into account. At individual IP level, we found some promising results which can contribute to clean public procurement, as well as some initiatives which could sustain the course. For instance, the Ministry of Health in Slovenia is implementing another IP over the course of the IP Project. Furthermore, the open data platform under development by the coalition of Italian partners (i.e. Amapola, Action Aid and TI Italy) has potential beyond the IP project. Although such an online open data tool requires time, effort and skills to maintain, it is an example of a good innovation which has the capacity to reach a wider audience, provided enough awareness raising efforts are conducted. This also illustrates the need for more communication and outreach initiatives.

As stated earlier in this section, creating ownership over the outcomes amongst CAs is an important step towards transparent and clean public procurement. While progress is being made towards meeting the specified IP Project outcomes, the IP Project has encountered a number of delays meaning that funding is

likely to end before all public procurement processes have been concluded and potentially before the intended results of the IP are met.

## 2.3. Efficiency

### KEY FINDINGS

- The project is a worthy experiment and provides the time and resources to test good approaches in public procurement
- The project team is very devoted to the project, but is not sufficiently supported by senior management.
- Internal reorganisation and changes within TI-S have had a negative impact on the implementation of the IP project.
- Within the team, some key functions are missing and the project lacks prominence within Transparency International
- The IP team has a tendency to over-concentrate on processes and procedures
- IP project management and participation in the IP project require significant time and energy efforts by TI-S and monitoring partners, but the value for money of the IP project for TI is unclear.

#### *The IP project is being implemented within budget*

According to financial figures provided to the MTLR team, the TI-S implementing team spent 49% of its budget, as of 31 October 2018. So far, there has been an underspend in a few key areas, most likely attributed to the vacancies in some positions on the team (e.g. communications role, and social accountability role), external-facing costs (e.g. promotional materials, travel, translation and interpretation and capacity building and training). Many fixed positions have not yet surpassed 50% of their allocated budget, including project oversight/strategic advisor (61% of budget remaining), legal oversight (64% remaining), outreach officer (64% remaining), project accountant (67% remaining). Each of these are key costs in order to ensure the implementation of the project, and will likely be necessary moving forward. Nonetheless, the spend to date suggests that the TI-S implementing team will have sufficient budget moving forward. This is important, as the second half of the granting period is likely see many more activities being undertaken as part of the IP project.

Overall, given the project is at the midpoint - many monitoring partners have spent on average 45% of their allocated budgets. Spend against progress varies from monitoring partner to monitoring partner, but there is no clear pattern indicating whether the time it takes to sign an IP bears on expenditure. For example, in Portugal, 45% of the funds were spent although there was no IP in place until October 2018. Nonetheless, it is clear that TI-Portugal invested time in maintaining a relationship with their CA partner, while in Czech Republic, 51% of the funds were spent and the project being monitored is almost complete. The project is being implemented in an economically justifiable way. From the beginning, TI-S made clear and communicated clearly how the project was set up, what was expected from the participants and how the team in Berlin could support the various TI Chapters and partners in this project. A lot of time, energy and intelligence has been put into setting up structures, procedures and ways of working between the 14 monitoring partners and TI-S. However, TI-S has not yet hired a 50%FTE communications officer for the IP



Project which means there has been an underspend in the project on this particular task line. Other areas such as IT support have not taken as much budget as anticipated at this time.

#### *Delays in implementing the IP Project*

Overall, the timeline of the project to the MTLR has not proven to be realistic. The fact that many IPs were delayed means that some projects will not be implemented within the expected initial timeline, with many having the opportunity to sign IPs only in the latter half of 2017 (TI-Romania/IPP), or 2018 (TI-Greece, Romanian Academic Society, Portugal). Although TI-S had anticipated some delays given the nature of funding cycles and bureaucratic practices at public administration level, it could not have foreseen the extent of the delays. Delays in signing IPs have been the result of changing political environments (TI-Romania) and delays in funding (TI-Portugal).

Some monitoring partners have stipulated that their IPs will end before the official project ends; others intend to continue beyond the official timeline, which means under the current grant agreement that monitoring activities will continue without compensation. However, monitoring partners were ultimately responsible for the decision on how long their project will run, and TI-S advised all partners to align their monitoring activities to the available budgets and timeline at the project proposal stage. Where time inefficiencies occur, particularly when they are outside the control of the monitoring partner, neither the TI-S teams nor the monitoring partners should be held accountable. This is important as delays have implications on the implementation of IPs or in getting public procurement procedures off the ground, and subsequently for monitoring their execution. Given the delayed or longer than expected implementation of the project, the monitoring partners face a dilemma: either end their monitoring activities which would incur a reputational risk, as well as end data collection on the IP experiment before the public procurement process officially ends; or, continue with the IP, which is a significant time investment without compensation for monitoring partners' efforts.

#### *The project team is very devoted to the project, but is not sufficiently supported by senior management*

TI-S has been through structural changes which have impacted on the organisation of the implementing IP project team. The IP project has been housed in three different TI-S units since its inception and the organisational changes within TI-S have largely determined the degree of autonomy the IP implementing team has had in making decisions on the project. For instance, when TI-S developed a flat structure, the project team could make hiring decisions independently. However, under the now hierarchical structure of TI-S, this is no longer the case. This has caused delays and in some cases confusion which affected the project negatively. A clear example of this is that the TI-S implementing team has not yet been allocated a communications officer at 50%FTE, or that the social accountability role was vacant for a significant period of time and the job was advertised only days before the incumbent left his position. This indicates a lack of priority for this project within TI-S. To mitigate against the risks of a vacant communications position, the TI-S team has hired an independent, external consultant; however, given that there are some processes the consultant cannot do on behalf of TI-S (e.g. draft or format communications in TI templates, or post communications on its behalf) this work falls to the IP Project implementing team and have caused problems and a lack of availability for the monitoring partners.

Interviewees and the MTR team registered a lot of attention for processes and procedures, for reporting and monitoring but less focus on the deliverables of this project or on supporting the partners in decisive ways.

The scoping interviews and interviews with individuals linked to the IP Project have made it apparent to the MTLR team that the IP project did, so far, not receive sufficient support or attention from TI-S senior management. A project of this complexity, importance and financial dimension should have had involvement and supervision from TI-S senior management, particularly as the structure and management of the IP Project team were in transition. Furthermore, while the project has clear strategic value, it is unclear how this will be leveraged to promote good practices in public procurement, or where exactly the project will sit within TI-S strategic outlook in 2020. Without this clarity, the chance exists that many of the learnings, useful contacts and partnerships will be lost.

#### *Monitoring partners report that TI-S is a supportive body, but TI-S ask for a lot from project partners*

While TI-S asks for a lot from monitoring partners, the monitoring partners stated that they receive a lot of information from TI-S and that TI-S supports learning lessons. TI-S has provided a framework for managing the IP project - acting as a bridge between the European Commission and the monitoring partners. TI-S has supported monitoring partners by providing a sample outline of an integrity pact, with specific information on the content and structure. In addition, TI-S has held regular telephone catch up meetings with monitoring partners and is reported to react to monitoring partners' queries in a timely manner (generally responding to partners within a day). Monitoring partners have seen TI-S as being supportive by providing information from how to conduct communications activities to sharing common challenges, and lessons from the implementation of projects to date. In some cases, TI-S has worked alongside partners who were making little progress, e.g. Portugal, where TI-S is helping to brainstorm on ways to use the project to test mechanisms to support good public procurement practices.

Nonetheless, while monitoring partners acknowledge that TI-S makes fair requests of project partners, they also state that TI-S does not necessarily contribute to the core monitoring activities, for example, in advance of stakeholder meetings. During the online focus group, it emerged that TI-S could be more proactive in encouraging additional communication and interaction amongst monitoring partners, particularly given its information advantage, in addition to the annual meetings, which are specially designed for this purpose. The MTLR team concludes that monitoring partners (given their other responsibilities) would prefer interactions where their required input is low while the potential learning gains are high. For example, monitoring partners in the online focus group agreed that the last meeting in Budapest was useful for bringing different stakeholders together. Keeping this in mind, TI-S should enhance its efforts to connect the monitoring partners and facilitate a more active exchange of information and experiences, such as peer-to-peer learning exchanges.

#### *The MEL approach is fit for purpose*

The monitoring, evaluation and learning (MEL) component of the IP project has been clearly mapped out and developed in tandem with monitoring partners' input in 2017, following a first iteration early in the project. TI-S has offered ample support and materials to monitoring partners to aid them in their MEL activities, and to ensure consistency in the approach to the degree possible.

There are a number of Key Performance Indicators (KPIs), and non-KPIs which they have agreed to report on, but partners report on these to varying standards. ODS recognises that the parameters and criteria on which the project partners report help to develop consistency across monitoring partners' biannual reports, as well as to provide a framework for coding information on partners' intent under KPIs. Nonetheless, intent for action should not be mistaken for or reported as an outcome, which the MTLR team has found evidence for in partner reports and donor reporting, e.g. TI-Italy's recommendation to a CA to report suspect bids to competition authorities. While this may indeed happen, at the time of the MTLR there is no evidence of results.

Furthermore, the project has collected lessons learned through the implementation of the IPs. Contracting authorities learned how a civil society organisations (CSO) can be a useful partner in a procurement project by requiring information, challenging its design, detecting irregularities, making recommendations and communicating to the public. Monitoring CSOs learned a lot about public procurement and the complexities of (large) public projects. Contractors learned that it is possible to cooperate with a monitoring partner and that CSOs, in particular when supported by external experts, can have valuable input.

At this stage of the project implementation, we do not suggest any changes to the MEL framework, given that consistency should be key in the final stages of the project.

Monitoring partners in the online focus group, while recognising the significant time commitment to the project, also called for TI-S to create a framework for interaction between monitoring partners to promote information exchanges and direct learning.



### 3. CONCLUSIONS

Integrity Pacts can be useful tools for improving transparency and clean contracting. TI-S' decision to conduct an experiment to monitor IPs is justified. The project brings valuable experience and expertise to TI-S and monitoring partners. TI-S, TI Chapters and other partners tested new approaches and learned lessons. Monitoring partners were understandably enthusiastic to have time and budget to engage in such an experiment.

Implementing an IP is an effort with significant requirements: money, time, dedication, technical expertise, monitoring expertise, social mobilisation skills, diplomacy, advocacy skills, etc. and even if present, they do not guarantee success. Learning and understanding by monitoring partners, but to a lesser extent in CAs and contractors are important achievements, but evidence that new policies, standards and practices have been embedded in CAs or transferred to other government bodies is limited. Government bodies, monitoring partners and contractors are developing new insights, testing prejudice, accepting to cooperate and overcoming divides. At the same time, the number of people involved in this learning is limited and the learning takes place primarily at individual level, rather than at institutional or business level. Bringing the lessons learned actively to relevant decision-making bodies and other stakeholders who might be interested in this new way of implementing IPs seems thus far not a priority for TI-S. The MTLR team has

not found ideas on how to bring the results of this project actively to relevant decision-making levels. In other words, while the IP Project is engaging in service delivery by parties normally external to public procurement, we have not seen intentions or plans for advocacy work and the project is not an integrated part of TI-S' overall strategy.

At this stage of the IP Project it is unclear what the distinct long-term outcomes of key and non-key recommendations for the public procurement processes are. Of course, the delivery of value for money in public procurement will not be fully known until the public procurement process has been completed and the full costs of implementation are known. The same applies to improvement enforcement of standards and policies which would be applicable to public procurement processes other than the one being monitored. At the same time, there are no strong indications that the IP Project will lead to substantial progress towards clean contracting.

Involving individual citizens and communities, triggering their interest in projects that affect their lives is important and useful. TI-S should have paid a lot more attention to communication from the beginning of the project. Professional external communication and outreach should have been central to this project. Once this became clear, the TI-S project team sought to address it, but with limited success. There is still a need to fill the communications role and this should not be delayed any longer.

Given the above, and given the mixed results in terms of relevance, efficiency and effectiveness in the IP Project, it is as yet unlikely that this IP monitoring project will lead to wider systemic or behavioural change. Even if the IP project has helped CAs to become better at what they do, it is not yet certain that it will serve as a catalyst for systemic change. There is also a risk that IPs with TI involvement or other monitoring partners will be used as a public relations tool or a symbol for political good will, but unaccompanied by the real political will to address issues more fundamentally. Nonetheless, the project contributes to the understanding of what is necessary in public procurement and how that need can be met.



## 4. RECOMMENDATIONS

The following section outlines a series of recommendations informed by the findings.

### Effectiveness

Implementation of recommendations on improving public procurement governance, standards and corporate policies should be closely followed

While it is encouraging that monitoring partners are reporting on adequate uptake of recommendations on adoption of improved standards or policies, it is crucial to monitor how these policies are implemented, shared and enforced. This is something the monitoring partners should pay particular attention to over the remainder of their monitoring duties and report on in the end-term learning review. For example, where whistleblowing policies have been drafted, monitoring partners should keep notes on how widely known they are in the relevant organisation (e.g. CA, private contractors, and subcontractors), any whistleblowing

incidents and how they were dealt with in order to make a final assessment on if and how these policies contribute to greater trust and transparency.

TI-S should be more proactive in arranging for more frequent communication and interaction amongst monitoring partners, particularly given its information advantage.

Further connections should be made between monitoring partners and TI-S to facilitate peer-to-peer learning exchanges. TI-S should encourage all monitoring partners, particularly those who struggle with or who are resistant to the MEL approach, to engage in online group sessions before MEL reporting. Such sessions would help discuss some of the difficulties or resistance to engaging in an IP process, help accepting the importance of MEL, embed the MEL activities in monitoring partners' practice, provide an opportunity for peer learning and provide the added incentive of sharing lessons amongst partners across situations in real time. While such sessions might be seen as an additional time burden, it would be a lighter process than sifting through other monitoring partners' reporting documents, while also allowing for follow-up in real time.

Monitoring partners should solicit feedback from affected communities on their engagement activities

Monitoring partners should engage in a feedback exercise to understand how their approach to citizen engagement works in engaging communities, particularly to tease out lessons and share approaches with other monitoring partners. Monitoring partners could speak with the local communities or conduct a survey in which they capture information on if and how their activities could be more community driven, in the pursuit of understanding how engagement activities can lead to learning embedded in a community.

Monitoring partners who have yet to engage communities should develop concrete plans with TI-S

For monitoring partners which have not yet engaged communities, TI-S' new social accountability coordinator could help them to refine their approach and plans, and map out ways in which they could engage partners. Following the MTLR, TI-S and monitoring partners should clarify in practical terms if, when and how civil society and citizens could monitor public procurement processes, not just whether or not they have the skills to do so (as per an intended outcome of the project). If they were to be further involved, citizens should be given the right conditions - in terms of information, access to decision makers, financial support - to become involved in issues that directly affect their interests.

TI-S should lead a post-MTLR after action review with monitoring partners

Although TI-S works alongside its monitoring partners and has regular updates with them, TI-S should organise an "after action review" to develop ownership over the findings and to develop the immediate course of action for IPs to process and generalise findings. TI-S should focus on priority areas of improvement (e.g. bridging gaps skills and capacities) or on areas where learning from one context can be leveraged in another.

TI-S could facilitate peer-to-peer learning and provide a framework for targeted connections between monitoring partners, for example to let them enter into group discussions. In between biannual meetings, TI-S could arrange group discussions once every two months, via an online platform. These discussions could coincide with MEL reporting, and/or could focus on specific themes (e.g. engaging bidders, successes in public communications, reaching and engaging communities, etc.), encouraging monitoring partners to detail their

promising outcomes, as well as building stories for further learning and advocacy. We suggest less formal reporting and more informal exchange of information and learning.

Following the MTLR, monitoring partners should consider the time and resources, as well as the progress they expect to make over the remainder of the integrity pact. Depending on their specific circumstances, monitoring partners should ask themselves a series of questions: What are the specific motivations of each IP partner? What is the limit of their involvement in the IP? If it is a CA, are they allowed to advocate for system level change? Are they actively taking ownership over outcomes and contributing towards behavioural and systemic change? If not, how can you motivate them to own the outcomes? What are the risks to ownership over outcomes if governments or political systems change, and relevant actors do not have political will to continue with the project?

#### Communications capacity needs to be further developed, particularly for the TI-S team and the monitoring partners

Storytelling should be a key tool in publicising the project and raising awareness and consciousness towards meeting the general objective and outcomes of the project. One common reference made by monitoring partners throughout the review was that it was difficult to get the media's attention, particularly with neutral stories. As such, TI-S should fill the currently vacant communications officer role on the TI-S project team as soon as possible to assist monitoring partners in identifying a media strategy, including how they communicate good and bad results relating to the IPs and how they reach out to local and national media. If monitoring partners feel it necessary, TI-S could consider media and communications workshops, seminars or training, (either online or at general meetings). These sessions could help to empower monitoring partners to understand how to best develop articles, blog posts, Tweets, etc., and how to create a story from outcomes which might otherwise be overlooked. For instance, what is the impact of negotiating a whistleblower clause? Or, what is so significant/promising about engaging adolescents in anti-corruption activities?

## Efficiency

#### TI-S should perform a detailed cost-effectiveness exercise with monitoring partners

TI-S and monitoring partners should perform an analysis of IP Projects' spend for the end-term learning review, to identify patterns in partner spending and understand where inefficiencies/efficiencies lie. It should also provide an overview to other potential monitoring partners for the time and budget they can expect to spend on this project, e.g. type of project, relationship with the CA.

#### Given the costs of monitoring and the importance of maintaining momentum on the experiment, TI-S should request an extension from the European Commission

Given the delays which have been incurred in getting a number of project's started, TI-S should make a case to the European Commission for a no-additional-cost extension to the contract, or for a provision to be made to bridge the funds earmarked for this project to the next EU funding period. Doing so will enable the further resourcing of monitoring activities and the facilitation of this experiment and its associated learning, while stating the importance of earmarking funds to complete monitoring activities.

The overall Theory of Change should be further detailed by TI-S

TI-S and monitoring partners should improve the Theory of Change by showing how project activities are thought to be linked to outputs and short-term outcomes, which should in turn show possible links to intermediate outcomes. Furthermore, the ToC should provide more detail concerning the assumptions underpinning the desired outcomes, and in particular regarding behavioural and systemic change. In the MEL reporting, the results of testing assumptions should get a prominent place.

The TI-S IP project implementing team should map out its strategic objectives related to the IP project

Given the scale and budget of the IP project, TI-S should look at this as an opportunity on which to build its profile and expertise in public procurement. The TI-S IP project team and management team should engage in a strategic discussion, in consultation with monitoring partners, as to how best the IP project can serve which ambitions, for example fostering working relationships with the European Commission and/or decision-making bodies at national level, developing closer working relationships within the TI community and/or with other civil society organisations and, importantly, how TI-S and its partners will process and use the findings from the IP project.

The MTLR recommends to translate the learning on public procurement into actionable proposals aimed at relevant decision-making bodies, including at European level, and use these proposals in TI's future advocacy efforts as well as plan for the proposals to make their way into the public arena. In addition, the existence of cross-cutting themes which resonate with other projects and activities should be investigated.

This strategic session should be concluded with concrete action points, such as developing an advocacy campaign around the outcomes of the TI IP project. Everything that was learned and all the new insights collected by TI-S and its Chapters should feed into an advocacy campaign towards political institutions. In fact, the chance that the TI-S IP experience will lead to systemic and behavioural change will, in the MTLR team's, depend on a well-coordinated advocacy push towards the political institutions at local, regional, national and European level to promote to promote the lessons learned and to integrate these key learnings in future public procurement.

## ANNEX I - EFFECTIVENESS MATRIX

Annex I is an effectiveness matrix which captures information relevant to the implementation of the IP projects implemented by the monitoring partners. This matrix draws upon insights from the interviews, document review, and the questionnaire, and other available evidence.

Monitoring partner	Design of integrity pact	Value IP relation pre tender	Monitoring	Engaging private sector	Ensuring value for money in public procurement	Political will & ownership	Citizen engagement	Public communications
TI-Bulgaria	The IP was originally signed in 2016; however, there were negotiations for a new IP that respects new public procurement law and these were difficult, ending in August 2017. The IP states that the monitoring activities will continue until the end of the funding contract for the IP Project, or until the	The value of the relationship pre-IP is important. In this case, the CA changed and the monitoring partner had to restart its relationship building efforts. The monitoring partner designed the approach and communications towards the CA, then first efforts directed towards really getting new CA on board, which was a successful	The monitoring partner hired external experts (two legal and two technical) in the first half of 2017. There have been difficulties in accessing the requisite tendering documents for the project relating to the Zheleznița Tunnel. In fact, the monitoring partner's assessment of the two tender processes which were cancelled was done on the basis of information provided to them by the CA, after the cancellations, rather	Signing up to the IP is voluntary for bidders in Bulgaria. In Bulgaria, the project to be monitored has been terminated twice - the first time round, bidders signed up to the IP, the second time bidders did not get to submit the tender. The third time 3/4 bidders submitted, the 4th has not yet signed at the time of writing. It is difficult for the MTLR team to make an assessment regarding bidder engagement or	At the time of conducting the MTLR, the MTLR team has not received information on any specific efforts or recommendations made by the monitoring partner which have contributed to potential cost efficiencies in the public procurement process.	Over the course of the IP Project, the political situation in Bulgaria changed. For instance, the original CA associated with the tender was dissolved; the new CA was experiencing problems and issues which resulted in turnover at the CA. As such, in the early stages	Citizens have not yet been engaged as part of the social accountability strand of the project as it is currently too early. The monitoring partner stated their intention to engage civil society organisations over directly engaging citizens.	The IP website was renovated, and the monitoring partner has reported that there have been 298 individual visitors for the reporting period, while there have been 623 separate page views. The MTLR team has not been able to make an assessment on the contribution of the communications



	<p>procurement contract has ended or has been cancelled. Based on information provided by TI-S, clauses have not been ambitious beyond outlining the baseline obligations of each of the participants of the IP.</p>	<p>endeavour. On the basis of the pre-tendering phase the monitoring partner could outline the value of the IP as a tool to enhance integrity and transparency in public procurement.</p>	<p>than in real time. The monitoring partner stated it was difficult to get documentation and information from the CA in mid-2017, despite written requests for information.</p>	<p>bidders' rationale for signing up (or not) to the IP, given that we did not speak with any of the bidders related to this IP.</p>		<p>of the project there was a lack of continuity in staff at the CA. The public procurement tender was also cancelled twice. The monitoring partner believes that they are required to follow up with the CA, rather than the CA taking ownership and initiative over the IP process. Reporting states that the lack of political will and ownership on the part of the CA had implications on the IP reaching anticipated targets.</p>	<p>activities to the IP Project's objectives given that no clear links between communications and outcomes have been made in reporting or interviews; however, the monitoring partner cited the use of its expert opinion regarding the cancellation of the tender in the media as a positive step, given that the media then had access to more than the official opinion of the CA.</p>
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TI-Czech Republic	The IP was signed in the second half of 2016. The IP sets out obligations of the CA, particularly to share documentation, as well as information of individuals from the CA involved in the tendering procedure. The monitoring partner has to be sure that information remains confidential under the penalty of a fine, and 6 monthly progress reporting is outlined. In addition, the monitoring partner enshrined their right to collect tender related documents in the IP, as well as being able to review progress on the tendering phase, and the implementation of the project.	The value of the relationship pre-tender was not made explicitly clear to the MTLR team as the monitoring partner interviewees were not heavily involved in the project from the beginning.	The monitoring partner hired an external technical expert to assist in the monitoring of the IP, but the monitoring partner had in-house expertise to conduct the monitoring activities, and had reported knowledge of public procurement legislation, experience with the public sector, and knowledge of EU fund management. This expert examined the tender documents. IP participants each agree that they have a good working relationship and that they have been able to share information freely and without issue.	The IP is not mandatory for bidders as IPs are not regulated for in law; however, it is mandatory for the successful contractor to sign. The IP was outlined in the tender documentation. Given the complexity of the project, and the fact that another specialised public tendering procedure was underway at the same time, there were no responses to the call, and the CA approached the eventual contractor directly. It is not clear how this approach has distinctly led to engagement with the IP, or what this means for other IPs in engaging the private sector, but the contractor had no objections to the IP.	It was not made clear to the MTLR team over the course of the study what the specific contribution of the IP project was towards enhancing value for money in public procurement.	IPs were a new concept in the CA, and there was a lack of understanding when the IP first began, which constituted a challenge in setting it up and making it happen. Nonetheless, despite an initial administrative burden relating to IP paperwork, the CA has demonstrated a willingness to fully participate in partnership with the monitoring partner by signing the IP. The IP serves as a mechanism in which the CA can demonstrate its transparency on public procurement, and this is an incentive to engage.	The monitoring partner reported that it is hard to capture the imagination on the topic of public procurement, given the technical nature of the IT procurement project. There are plans to develop a survey to understand user experiences in the second half of 2018. As such, the citizen engagement activities have been centred on the end users of the software. The monitoring partner engaged end-users through a survey. This is a discrete and efficient way of capturing the necessary information on the quality and use of the software, although context specific, given that not all affected	The implementation of the IP was made public on the website, and the reporting highlights a joint press conference with the CA on which three media outlets reported. Based on the online communications, the monitoring partner reports tens of views on their web-domain and hundreds of views on its social media accounts relating to news items and project related items. Nonetheless, the MTLR team has not been able to make an assessment on the contribution of the communications activities to the IP Project's objectives given
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	Further, the monitoring partner negotiated to be able to conduct surveys amongst users of the IT system.						communities are concentrated in an institution. Furthermore, this activity does not clearly build capacity amongst affected communities in conducting monitoring activities on their own, rather it represents an opportunity to solicit feedback from the affected community, which is one of the social accountability models the IP project is pursuing.	that no clear links have been made in reporting or interviews.
TI-Greece	The IP was signed in the first half of 2018. The monitoring partner explained that they drafted each of the IP clauses and that they made use of their legal expert in order to ensure compliance with legislation. All clauses were	The pre-tendering phase has been useful for developing a good working relationship with the CA, which the monitoring partner credits as being helpful in having recommendations taken up. The monitoring partner	The monitoring partner liaised with CA pre-IP to have access to documents. The monitoring partner explained that they have a lot of the required expertise within the TI-Greece team to conduct the monitoring activities related to the IP project e.g. project manager,	Bidders were informed of the IP in advance of responding to the call for tenders as information on the IP was included in the tender documentation. TI-Greece proactively reached out to different bodies (e.g. companies, associations of engineers, etc.) to	The monitoring partner made a recommendation to develop the qualitative selection criteria relating to bidders. The monitor explained the disadvantages of narrow selection criteria, as well	The monitoring partner and the CA have a good working relationship. Fresh elections are expected towards the end of the IP project, and are therefore unlikely to change the course of the IP.	The monitoring partner reached out to civil society organisations to gauge their interest in getting involved with monitoring activities. Reported engagement of civil society was low for a number of reasons: lack of technical expertise,	The monitoring partner developed a dedicated integrity pact website. The TI-Greece IP website has attracted roughly 1 million unique visitors who were accessing an article. Furthermore,

	<p>accepted by the contracting authority as set out by TI-Greece. This is likely as a result of trust built between the monitoring partner, the CA and the MA. The clauses proposed by TI-Greece and accepted by the CA include the monitor's rights within the IP relationship and obligations on other IP participants, including access to information.</p>	<p>wished to build a good relationship with the CA and MA, and help facilitate their learning in the pre-tendering phase; one example of this approach was to include a representative from the CA and MA on a learning trip to TI-Bulgaria.</p>	<p>outreach and advocacy coordinator and project accountant, etc.); however, they sourced external legal and civil engineering expertise through procurement procedures.</p>	<p>explain the IP in advance of bids being received. They stated that there were no questions concerning the content or the process relating to the IP.</p>	<p>as areas where bidders might be disadvantaged, and the CA took this recommendation on board. The monitoring partner's reporting suggests that an expected increase in competition would lead to cost savings in the procurement procedure. At the time of conducting the study, the tender procedure in Greece had been launched and no information on the number of bidders was provided to the MTLR team. Therefore, no assessment on value for money can be made by the MTLR team;</p>	<p>However, it is unclear who will be elected and what impact the election results will have on the continuity of the monitoring partner's relationship with the CA.</p>	<p>and a lack of funding to engage with the project. An additional challenge to engaging citizens more widely in the IP project concerns an underground pipeline which is not visible to citizens, and the perception is that it will be hard to engage.</p>	<p>while over 2,000 people were reached and 108 reacted to photos taken at the signature of the IP on social media, these data do not describe the influence that the IP is having in national discourse, and how those reached by such communication engage with the IP or build capacity afterwards. This is consistent with other monitoring partners' communication efforts, and it is not clear how activities link to outcomes, but it is clear that the activities link to enhancing transparency in principle.</p>
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					however, the monitor should make a note of the potential cost savings of its recommendation once the tender process has been closed.			
TI - Hungary	The M6 IP was signed in the second half of 2016, and the Reservoir IP was signed in the first half of 2017. In terms of obligations on monitoring partners and CAs, one CA (M6 IP) had hoped for sign off on all monitoring reports and outputs, as such, there is an annex which stipulates that both sides should have the opportunity to share their side of the story in any external communication	For the M6 project, TI-Hungary explained how the IP would work and provided information and a sample IP. The pre-tendering phase presented an opportunity to build trust between monitoring partners and CAs for both M6 and Flood Reservoir projects.	Monitoring activities are ongoing for M6 project. The monitoring partner brought a lot of expertise to the IP Project, including legal, management, and communications expertise, while they needed to outsource the technical capacity, such as engineering expertise. While the monitoring partner reported that they had general public procurement expertise, they have outsourced public procurement expertise on both projects where they require specific knowledge and expertise. This is	Bidders and contractors are not required to sign the IP. However, bidders received information with the tender documentation informing them of the possibility to volunteer to sign the IP. At the time of writing the MTLR, no contractor had been selected; it is therefore unknown how contractors will engage with the IP.	Irregularity in bidders' pricing offers detected on the M6 project, and TI-Hungary recommended a decrease in maximum budget, given that the monitoring partner assessed that the work was over budgeted for. While on paper the procurement process has been reduced by 200 million HUF, the full cost implications of this procurement	The monitoring activities were progressing well before the elections in 2018. Since the IP was signed, the monitoring partner stated that there was turnover in staff in the CA. This turnover is cited as a reason for some of the delays in advancing the IP project. Furthermore, the monitoring partner has stated that CA staff are reluctant to take decisions, which	As of yet, the MTLR did not see an elaborated plan for citizen engagement, nor was there any reported citizen engagement to date. However, the monitoring partner stated that they would like to engage the local communities near the Croatian border for the M6 IP. These efforts are likely to amount to meeting with local businesses to understand the impact that the motorway would have on business. For the flood reservoir IP, the	There is limited detail surrounding the nature of the communications activities run by the monitoring partner, although many of them are run online. The monitoring partners reported over 299,000 and over 321,000 views on two different news posts relative to the IP Project. An innovative piece of communications work was to livestream an Anti-Corruption Day Conference on Facebook which was viewed

	<p>and that the monitor has to get permission from the CA for any external presentations relating to the IP. This represents an example of compromise where negotiations are stalled, and a potential risk to the dissemination of project results if the CA does not grant permission. There was no explicit specification in the IP for one CA (Flood Reservoir project) to get involved in monitoring, evaluation and learning activities. As such, one CA has refused to participate. This example highlights the need for specificity and to ensure that all needs of the</p>		<p>consistent with other monitoring partners' practice of sourcing required expertise where necessary, and is indispensable to the efficient monitoring of the project. Although bringing in this external expertise was not without challenge given they needed to have no conflict of interest (e.g. an expert which has not worked with the CA) and the difficulties in finding niche expertise in a small market.</p>		<p>procedure will not be known until the work has been completed.</p>	<p>could highlight a potential risk to continuity and ownership over IP outcomes. Furthermore, there appears to have been a lack of will to engage in the monitoring activities of the IP. For instance, the CA linked to the Flood Reservoir project did not wish to engage in MEL activities to understand how IPs are implemented and their effect, as they are not prescribed in the IP.</p>	<p>monitoring partner would like to engage with local schools. However, the likely format or outcome of these engagement activities are, as of yet, not specified. Lessons on the appropriate approach can be learned from the Amapola and Action Aid IPs.</p>	<p>by over 22,000 individuals. Nonetheless, there has been no clear indication as to who was reached by these communications and how these communications contribute to meeting the overall aims of the project to date.</p>
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	monitoring partner are captured in writing in the IP.							
Action Aid	The IP was signed in the second half of 2016. The IP stipulates that the CA must commit to an open data format relating to the project, and to engagement in citizens' fora as a means of working towards project outcomes which rely on behaviour change of specific groups (e.g. affected communities). This particular clause would contribute to transparency in public procurement procedures.	The monitoring partner did not have the opportunity to review and analyse the full tendering documentation before they were published for tender. As such, the monitoring partner had no opportunity to present comments or recommendations in advance of publication. The monitoring partner raised this point with the CA and MA, and produced an analysis on the published tenders, and produced a report with requests for clarification.	The three organisations monitoring the IP (Action Aid, Gruppo Abele, Monithon) joined together in coalition as they had complementing expertise (e.g. Gruppo Abele brings experience in running digital campaigns). The monitoring partner has ensured the requisite expertise for its team, including an MEL expert, an archaeological consultant, a legal consultant. The role of the archaeological and the legal consultants are to provide specialised knowledge on the procedure under procurement. Furthermore, to aid the monitoring activities, the three lead Italian	The monitoring partner invited bidders to attend a webinar session to gather more information on the IP, particularly as the tender was launched sooner than anticipated. Given that IPs are provided for in law, bidders are obliged to sign, and this is the monitoring partner's leading assumption, it is difficult to know the impact of such a session but this served as an opportunity to respond to questions during the tender procedure. The MTLR team had no contact with bidders participating in this particular IP, as such we could not verify	Some examples which are likely to prove cost beneficial include using open access formats, for instance using open source software on the Sibari museum's multimedia exhibition, or open format files in exhibitions to save on proprietary costs. Based on reporting, the tangible cost-efficiencies are not clear, but the monitoring partner should pay close attention to how recommendatio ns are	IPs have been legislated for, therefore the overarching political will is present. The CA is engaged with the IP process. However, the monitoring partner reported that recommendation s on the first lot of tenders was not taken up due to the fact that the tendering documents were published before the monitoring partner had the opportunity to review them. Nonetheless, Action Aid reports that a number of lots on	The monitoring partner engaged in citizen engagement activities from an early stage in the IP process (e.g. research activities and mapping exercises to identify appropriate stakeholders, webinars and site visits). Nonetheless, the monitoring partner has stated that it is difficult to keep citizens' attention levels over a long period of time, particularly given that public procurement activities take so long. It was also reported to the MTLR team that citizens did not feel ownership over the	The Italian monitoring partners share a website - approximately 2,000 page views were reported for the home page, and hundreds for different articles and posts (e.g. newsletter). However, without information on the intended reach of the website across each implementing site in Italy, it is difficult to contextualise these findings or to assess their specific contribution at the mid-term to meeting IP Project objectives.

			monitoring partners (ActionAid, Amapola and TI-Italy) are in the process of preparing and launching an open data platform for invoicing.	that this is the bidders' position.	implemented and consider running a comparative analysis on quality and cost criteria for open source/format versus proprietary solutions.	which recommendations were made have not yet been published and hopes the CA will take these on board.	process, and this indicates either a gap in capacity or the monitoring partners' willingness to reduce their role. Over the remainder of the project period, the monitoring partner should continue its efforts with citizens, but identify what type of structure would be conducive to a more citizen-led approach (which includes the monitoring partner's support).	
Amapola	The IP was signed in the first half of 2017. No big issues were reported during the negotiations. According to the monitoring agreement, not the IP, the monitoring partner is bound to its monitoring duties until 30 September 2019 – the end date of the	The relationship with the CA in the pre-tendering phase was used to build a relationship and understanding of the IP project, and monitoring on the pre-tendering documents.	The monitoring partner reported in 2016 that they had experience in EU project management, that they have the relevant skills for their monitoring team, including legal expertise, evaluation expertise, and outreach and advocacy expertise. In 2017, the monitoring partner hired a Sicily-based engineer, as well as a lawyer and	The IP is mandatory for private sector bidders, not just the contractor, based on a recommendation made by Amapola to the CA. However, engagement with the private sector has not yet taken place based on information received by the MTLR team, and this is likely due to the project delays in approving the Framework	It is not, as of yet, clear how the project will contribute value for money in procurement processes. The monitoring partner reported that a non-key recommendation from the monitoring partner to the	IPs are enshrined in Italian law. However, the monitoring partner stated in reporting that the key recommendations had not been adequately addressed, which raises questions as to the commitment of the CA to the IP.	Amapola has in-house outreach expertise. The innovative experiment in engaging students was an innovative approach to building monitoring and analysis skills. The exercise also sensitised young people as to where to go to get information on	Interesting experiments, however with very limited effects, for example videos have all had less than 100 viewers. The IP website has had approximately 2,000 page views (see Action Aid above). However, without information on the intended reach of



<p>funding received from DG Regio. The tender has just been completed and published. Much like the TI-Italy monitoring agreement, the monitoring partner will implement a whistleblowing platform, and there are provisions in the monitoring agreement which outline the needs of the monitoring partner to conduct monitoring activities, and the obligations of the CA to provide this information. This is good practice to ensure that there are clear provisions to ensure that the monitoring work can be adequately conducted</p>			<p>administrative law professor to bring in the necessary expertise in support of the monitoring activities of the IP. The monitoring partner reported a good relationship with the CA, and has not reported any irregularities to date. Overall, the team is adapted to the needs of the project. The three lead Italian monitoring partners are taking full advantage of the IP experiment in implementing an open data platform for invoicing.</p>	<p>Programme Agreement.</p>	<p>CA was taken up. This recommendation was to require all bidders to sign the IP to mitigate against potential misconduct. As of yet, since the contractor has not yet been selected, it is unclear how this recommendation will impact on value for money and the monitoring partner intends to pay close attention to this point during its monitoring activities. The monitoring partner stated that their key recommendations have not been adequately taken on board.</p>	<p>The monitoring partner reported that the union of municipalities has bought in to the IP process. But for implementation, the civil service must be convinced, and it was reported that these individuals need to learn to conform to the law, navigate internal hierarchies, etc. This perception demonstrates that it is not sufficient to have political mandate, but also for attitudes to align.</p>	<p>public procurement processes. The exercises, however, reached 13 students, and the monitoring partner reported that they are unsure how sustainable the learning and results from this process will be. Nonetheless, this particular approach could serve as a good example for how to approach citizen monitoring of public procurement, and serve the basis of a how-to guide or step-by-step instruction manual (particularly for the Italian context).</p>	<p>the website, it is difficult to contextualise these findings or to assess their specific contribution at the mid-term towards meeting IP Project objectives.</p>
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<p>TI -Italy</p>	<p>The Cagliari rail IP was signed in the first half of 2016; the ESF IP was signed in the second half of 2016. The monitoring partner based the two IPs on Italian law, and existing models and improved them. After limited talks, both CAs signed the IPs. The IP is effective until the end of the tendered project or within three years of signature of the IP, unless an extension has been agreed. The IP outlines obligations on how the CA must act when faced with corrupt actions or activities. Contractors are not obliged to implement whistleblowing mechanisms. The monitoring partner</p>	<p>The monitoring partner reported a good relationship between monitoring partner and CA in Lombardia and Sardinia. In the pre-tendering phase the monitoring partner was able to analyse the preliminary documents relating to the projects.</p>	<p>Monitoring partner has the appropriate skills, through external experts in Sardinia and Lombardia. One outcome from the monitoring process (in Sardinia) was the discovery of bids with the same monetary value, which was reported to the CA and formed the basis of a recommendation for a CA wide policy to report suspicious financial bidding to relevant authorities. As such, the monitoring partner added value in highlighting a potential irregularity, but it remains to be seen if this type of irregularity will be detected and reported on in future public procurement procedures. Technical expertise was sourced for both projects to enable the examination of the public procurement processes. One apparent limitation</p>	<p>The IP is mandatory for all bidders. Italy has regulated for IPs, as such bidders and contractors can be required to sign IPs. It is overall unclear from the reporting the extent to which bidders subscribed to the IP process out of their will to contribute to clean and transparent procurement or simply accepting the IP as a requirement of the work.</p>	<p>In Lombardia, the monitoring partner made a recommendation, taken up by the CA that suspected cartels would be reported to authorities. This is a promising recommendation but has not yet been put to the test, or been enshrined in CA policies, to the best knowledge of the MTLR team. Therefore, the monitoring partner needs to query the implementation of this particular recommendation over the course of its monitoring activities. In Sardinia, there is an intention to implement a whistleblower</p>	<p>IPs are enshrined in law, and CAs are reportedly open to collaboration. Having IP provision set in law can help understanding of the IP, and the level of engagement which can be expected from a CA. Furthermore, in one case (Sardinia) the managing authority is also a co-signatory of the IP, which shows political will beyond the CA. CAs have accepted some recommendations showing their intention to follow through on recommendations (see previous column) which demonstrates</p>	<p>The monitoring partner set up an open reporting platform (for Sardinia), and no activity has been reported to the knowledge of the MTLR team. As mentioned by the monitoring partner, additional dissemination activities are necessary. In Lombardia, efforts to recruit schools in monitoring activities proved difficult; however some initial outreach and explanation of the project was conducted. Although there are no clear results or outcomes from these engagement efforts, the Italian monitoring partners have demonstrated dedication towards building awareness and skills amongst</p>	<p>The Italian monitoring partners share a website (see Action Aid above). However, without information on the intended reach of the website across each implementing site in Italy, it is difficult to contextualise these findings or to assess their specific contribution at the mid-term to meeting IP Project objectives.</p>
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	<p>is obliged to make a whistleblowing platform, while also asserting its rights as a monitoring partner ensuring ease of access to documentation. Monitoring, openness to civil society and whistleblowing mechanism were additional conditions than those required by law but were deemed acceptable additions for CAs and monitoring partners.</p>		<p>during the tendering procedure was the monitoring partner's access to documents on the condition of confidentiality, meaning that when an anomaly was detected in Lombardia that they could not report to another authority. The monitoring partner reported that no solution was found other than an internal investigation on the issue. This constitutes a limitation to monitoring partners' abilities to highlight irregularities in public procurement, and something which could potentially be addressed in further iterations of IPs, for instance that monitors can report potentially anti-corrupt behaviours.</p>		<p>mechanism, although this has not yet been implemented. As such, the end-term review may reveal more information on the contribution of these efforts to value for money as a result of the IP.</p>	<p>ownership over IP outcomes, but the extent to which these recommendations are fully implemented should be closely monitored.</p>	<p>citizens. Monitoring partners will continue to collect results on this, and lessons should be learned from the Amapola engagement with students during TI-Italy's engagement activities, particularly in terms of reach and how the skills might be applied in the future.</p>	
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<p>TI-Latvia</p>	<p>The IP was signed in the second half of 2016. The IP states that the monitoring activities will run until September 2019, provided that a notice of cancellation of monitoring activities is given three months in advance. Negotiation on whether CA or monitoring partner requests information from contractor, frequency of request for information, and monitoring partners' access to information. The monitoring partner was sceptical of the CA's commitment to the process in the initial stages and therefore asked the Ministry of Finance to intervene in the IP</p>	<p>The value of the relationship between the monitoring partner and the CA in the pre-tendering phase is unclear. There have been difficulties in the relationship from the beginning, and the monitoring partner involved the MA to mitigate against any risk the CA would not be collaborative.</p>	<p>The monitoring partner outlined the roles necessary for conducting their activities, including project management and coordination, an accountant, outreach and advocacy coordinator, which are available in-house. However, the monitor believed that there was not enough capacity within their organisation and hired external experts to complement their work. The monitoring partner released a call for experts in law, and the technical construction experts. Monitoring activities include background research on individuals and companies involved in the project to ensure no conflict of interest or corruption.</p>	<p>As part of the IP, CAs had to inform potential bidders that the IP was mandatory during the tendering period. Successful contractors, and subcontractors (with some exceptions), are required to sign up to the IP. While the winning bidder in this IP was open to engaging with the IP, as is the case with TI-Czech Republic's IP, it is unclear how this approach has distinctly led to private sector engagement with the IP, or what this means for other IP projects in engaging the private sector.</p>	<p>The first procurement procedure was halted as the selection criteria was narrow and suspected to favour one bidder over another. There were a number of recommendations made by TI-Latvia and implemented by the CA, such as raising awareness of the tendering documents through public channels (e.g. radio, social media, etc.), translating the documents into a language other than Latvian (at an extra cost to the CA), and making tender documents available electronically,</p>	<p>The monitoring partner stated that the Ministry of Finance has shown support for the IP project, and has demonstrated their commitment to the process by ensuring the cooperation of the CA to the process. In the short term, this support has enabled the monitoring team to construct the IP and conduct its monitoring activities. In the future, this "buy in" could prove important in the later stages of the project and the transfer of outcomes.</p>	<p>The monitoring partner has stated that it is too soon in the public procurement process to engage with citizens, although TI-Latvia has stated its intention to do so once construction works commence without outlining any formulated plan on this point. However, the monitoring partner appreciated the learning from other IP projects (e.g. Italian projects) which could be applied to the Latvian context, demonstrating that IPs are open to sharing and making use of ideas from the overall project framework.</p>	<p>The monitoring partner has made efforts to disseminate information about the project on its webpage (fewer than 200 reported views for IP specific information) and social media accounts (with varying reach and engagement, e.g. an event reached over 4,000 individuals while 80 individuals engaged while the maximum click on an average Facebook post is reportedly 42). Furthermore the monitoring partner created an interactive timeline of the project (although the MTLR team has no data on its web-traffic since its update), and delivering press</p>
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	<p>project and mandate the CA's full compliance. As such, the CA is required to provide documentation. This is an example of where trust has not been established from an early stage in the project, and also where a monitoring partner has had to clearly and plainly stipulate their rights in the IP in order to access information.</p>				<p>rather than exclusively from the CA premises. Each of these recommendations were made with the intention of encouraging greater competition (three applications, rather than a single-bidder, one of whom was excluded from the process).</p>			<p>conferences. One press conference in particular focused on the purpose of the IP, and the monitoring partner stated that the media elected to focus on the monitoring partner's staffs' salary than the potential benefits of an IP, While these efforts show the monitoring partner is operating in the spirit of transparency in raising awareness of the IP, the media has not demonstrated their interest in discussing this topic and the implications of an IP in public procurement, further illustrating the challenging nature of TI-Lativa's task.</p>
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TI-Lithuania	The IP was signed in the first half of 2017. TI-Lithuania used an IP developed by TI-S as a basis for their own IP. In line with national rules against corruption, the IP stipulates behaviours to which IP participants must adhere. The IP stipulates that the CA cannot place restrictions on accessing information relevant for monitoring the IP. For instance, the CA is not allowed to mandate that documents must be exclusively read in a specific location,	The CA and monitoring partner already had a good working relationship based on previous interactions.	The CA and the monitoring partner are reported to have a good working relationship. The monitoring process is very legal and technical in character in preparation for the actual procurement procedure, these skills were not available in the monitoring partner's organisation and they hired legal (construction procurement) and engineering experts. The IP is a new process for the monitoring partner and experts, and they have reported the challenges associated with formulating recommendations and calculating benefits. This might indicate that	While there is no obligation for bidders or successful contractors to sign up to the IP, the CA has committed (through its involvement with the IP) to encourage selected bidders to participate in the process. TI-Lithuania organised a survey for bidders (170 participants) to identify risks in municipal procurement. The monitoring partner reported the benefit of such a tool which helped them to formulate their advocacy approach. This represents an innovative way to reach a key stakeholder and gather	The monitoring partner hired experts to propose changes to increase level of bidders and highlighted possible cost savings. One particular mechanism they tried was to compare the bids for the procurement process being monitored with the bids from a related project which is underway. Although the monitoring partner has not been able to state the exact value for money	The CA has demonstrated its commitment to this particular IP, and to the spirit of the experiment for learning. Nonetheless, there are doubts as to the scalability of the IP given there are thousands of contracting authorities in Lithuania. The purpose of the overall project is not to necessarily replicate the IP, but to ensure that outcomes are sustainable and can lead to good public procurement	No engagement with citizens has yet started, and the MTLR team has not received any plan for future engagement.	The survey distributed to bidders gave the monitoring partner exposure in 6 media articles and 3 radio interviews. The monitoring partner reported that the IP website development was delayed because change of subject caused delays. This might be a missed opportunity to set up a website and report on the complexities of the public procurement process to raise awareness of the delays which can occur. As of yet,

	<p>such as the CA's premises. This is a creative clause which serves as an insurance policy to protect the monitoring partners in terms of how it can access and process information. Furthermore, Lithuania has inserted another unique clause across the IP Project in requiring bidders to provide information on all companies (including beneficial ownership information and a list of shareholders) which further boosts transparency in order to recognise appropriate and inappropriate behaviours amongst contractors. In</p>		<p>additional capacity building efforts are needed to help monitoring partners to assess tenders and formulate appropriate recommendations for the benefit of the public procurement procedure.</p>	<p>data and information for the purposes of the IP project.</p>	<p>benefit of this recommendation, it is likely to serve as a benchmark on costs to understand if the project has been reasonably priced. Real costs of the project will only be known upon completion, as such, so too will the value for money aspect of the IP and monitor's recommendations.</p>	<p>practices, which has not yet been demonstrated in this IP at the mid-term point.</p>		<p>the IP specific website has not been launched, and information on the IP on TI-Lithuania's page has had 100 unique page views, which do not reveal anything about the awareness raised.</p>
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	terms of sanctions, Clause 24 outlines that in the event of violations, TI-Lithuania will use negative publicity against the IP participants, where necessary, placing a clear reputational risk in the case of transgression.							
SBF	<p>The IP was signed in the second half of 2016. Lawyers from the CA and monitoring partner negotiated the terms.</p> <p>The monitoring partner inserted a whistleblowing clause into the IP for contractors, for reasons of transparency and protection of staff working with the contractor. This clause would enable contractors</p>	<p>The monitoring partner was assigned to this procurement process a month before the project to be monitored went to tender. Due to not having the necessary accreditation, and not wishing to delay the procurement process, the monitoring partner did not have an opportunity to make recommendations</p>	<p>The monitoring partner conducts regular monitoring by reviewing documents shared by the contractor and CA. As part of the monitoring assignment, the monitoring partner delivered a risk mapping and implementation plan. The monitoring partner reported being assigned to the public procurement project a month before it went to tender. In order to not make a delay on the</p>	<p>The IP is mandatory for the successful contractor, reportedly based on public procurement law which allows CAs to place additional conditions on successful bidders. Out of 300 questions, no bidder asked questions about the IP during the tendering phase.</p>	<p>The monitoring partner made a non-key recommendation to ensure that the selection of bidders was based on qualitative information, rather than simply the lowest cost bidder. This was adequately taken up; however, only once the work has been fully</p>	<p>There was a reported reluctance on the part of the CA to engage with the IP, although the Ministry intervened and the CA appears to be communicative and responsive to monitoring partners' requests. It is difficult to tell if this relates to political will or rather the</p>	<p>SBF reported difficulties in approaching citizens but the MTLR team is not aware of any social accountability/citizen engagement strategy. The monitor reportedly was organising a meeting with local inhabitants and the media in the area concerned by the railway, and found that there was little interest in the meeting.</p>	<p>The monitoring partner has reported on a number of communications related to the project in the hopes of raising awareness on the IP. One notable example is an interview with one member of the monitoring team disseminated in a media outlet which had a reported reach of 90,408.</p>



	<p>and subcontractors to report misconduct in confidence. However, the MTLR team is not aware that the policy has been enacted or used by any whistleblowers to date. Like many other monitoring partners, SBF inserted a provision in the IP to save any ambiguity on the access the monitoring partner would have to documentation; as such, a clause was inserted into the IP to have access to minutes of the public procurement proceedings, as well as a comprehensive list of information to which the monitor would have access, for instance, correspondence</p>	<p>on the tendering documents. At first the CA was reluctant to engage, but has become more open to communication over the course of the project. It is not clear the pre-tendering phase would have helped with setting out the objectives and general understanding of the IP project to the CA, but this relationship has been useful for other monitoring partners and CAs. In addition, as stated in the main report, more recommendations were made in the pre-tendering phase over other phases in the IP project. While in this case the other phases have not yet progressed, the pre-tendering phase</p>	<p>implementation of the tender, SBF hired a legal and technical consultant with whom they reviewed and analysed the tendering documentation. On the basis of this analysis, the monitoring partner had comments on the content and sent a letter to the CA requesting additional information. The monitoring partner was able to sit on the selection committee as an observer, during which time they signalled a potential conflict of interest which was deemed by the monitoring partner as adequately addressed by the CA. While the monitoring partner did not have the same influence in the pre-tendering phase in terms of making recommendations, they were able to participate in an important aspect of the public</p>		<p>completed will the full costs of the procured project be known and the overall influence on value for money the IP had.</p>	<p>obligation to see the IP through. The CA had already developed an anti-corruption policy which is reportedly consistent with the IP, demonstrating that they had already been working on anti-corruption activities.</p>	<p>Furthermore, the monitoring partner cited the most difficult aspect of citizen engagement to be their distance from the site of implementation, believing that this factor makes developing a network or connecting with citizens difficult. However, as seen with other projects, distance has not been a barrier to citizen engagement, and this constitutes an important area for the transfer of learning across monitoring partners.</p>	<p>Furthermore, the monitoring partner reported on media coverage of the press briefing on the signature of the IP, with a maximum reach of over 3,245. Nonetheless, it is not clear how, once viewed, these items contributed to any growth in awareness of transparency and clean procurement amongst the media or citizens.</p>
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	with bidders, applications, audits, information on personnel, etc.	provided an opportunity to develop the relationship between CAs and monitoring partners, and in ensuring a clean procurement process. Even though there is reportedly a good working relationship between the contractor and monitoring partner, the contractor has voiced scepticism as to the potential value the IP will add in improving the public procurement processes in Poland, noting that the tender documents produced for this particular consultancy contain similar mistakes to other tender documents (according to TI-S documentation).	procurement phase and alert the CA to concerns, demonstrating the importance of the monitoring partner in ensuring transparency and clean procurement. Furthermore, the monitoring partner also stated that the costs of monitoring activities were high, suggesting that this had not been adequately reflected upon by TI-S and suggested that if replicated the IPs should suggest that a proportion of the budget in public procurement practices be earmarked for the monitoring activities.					
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TI-Portugal	The IP was signed in the second half of 2018. At the time of delivery, the MTLR team had not examined the IP.	The IP project in Portugal is still in the pre-tendering phase. Given the delays, the monitoring partner has made themselves available to the CA to respond to questions and provide advice. As such, this phase has led to the development of trust between the two parties.	The monitoring activities to date have shed light on the CA's unwillingness to accept non-legal recommendations. The monitoring partner took this as an opportunity to explain the project goals and expected deliverables.	The IP has just been signed between the monitoring partner and the CA. The MTLR is unaware as to how engagement efforts with the private sector are being undertaken.	Not yet known.	The political will is unclear given the slow progress. Money has only just been allocated for a potential project and at the time of the MTLR there was no data on this point; although the willingness of the CA to keep open conversations with TI-Portugal while waiting for funding can be taken as a positive sign towards collaborating for clean procurement. However, to date the CA has not shown willingness to accept non-legal recommendations. While it is too soon to make a full assessment on the	To date there have been no clear examples of citizen engagement, given that the IP has been recently signed.	To date the TI-Portugal website has released four newsletters referencing the IP project goals and deliverables (views range from 185 to 310). In 2018, there have been two blog posts on the TI-Portugal website, one with 29 and the other with 68 views. As for other monitoring partners, while communications and outreach efforts are commendable in enhancing transparency, publishing information on a monitoring partner's website might not have the same reach as a publication delivered elsewhere, such as a national news outlet. The
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						implications of this particular circumstance, there is a risk that the CA will buy into the IP in as far as it protects the CA's legal interests rather than develop ownership over the wider potential outcomes of the IP.		monitoring partner should consider how it wishes to work towards the IP Project's outcomes through its communications efforts and consider how this might best be achieved.
Institute for Public Policy (IPP) & TI-Romania	All the IPs were signed in the second half of 2017. The negotiations centred heavily on the ability to sit in the evaluation of tenders; this was denied by Romanian authorities, as the monitoring partner and the CA and MA had different interpretations on the law concerning third party observers in such	The relationship between the monitoring partner and the CAs in the pre-tendering phase has enabled trust and mutual understanding between the parties. In addition, it has enabled the monitoring partner to suggest areas on which the CAs could focus for integrity..	The monitoring partners stated that much of the requisite expertise for monitoring activities was within the two monitoring partner organisations, including land registration expertise, innovation and learning expertise, web development expertise, project team management, etc. Technical expertise (IT specialist) and legal expertise were sourced externally. The CA has provided	The IP is not mandatory, but the agreement between the monitoring partners and the CAs outlines that CAs will request that bidders complete a declaration to sign the IP. At the time of research, the tender documents had not been launched, and the MTLR team is not aware of any engagement with the private sector as of yet.	The contribution of the IP to cost effectiveness or value for money is, as of yet, unclear. The monitoring partner's recommendation to evaluate tenders on quality criteria relative to price was not taken up under the explanation that quality could be subjective while the lowest price	The contracting authority is committed to participating in the integrity pact as a way in which to capture evidence on the public procurement process more generally. While the political will beyond the CA is unclear to the MTLR team, interviews revealed that the IP is a positive	Although the MTLR team found no evidence of an overall community engagement plan, the monitoring partners reported that they discussed their intention to engage communities with business and CSOs in late 2017. However, at present the MTLR team cannot make any assessment as engagement activities have not yet taken place.	The monitoring partners reported that monthly newsletters are published and the partners state that their reach is 6,300 individuals, by email and the website. This is a significant reach, but the MTLR team cannot make any assessment on the basis of reach. While it is important to share the activities and raise awareness of

	<p>meetings. The monitoring partners set out a unique annex across all the IPs in this particular IP by stipulating that bidders could not make excessive use of a law which could consider all information in the tender as being confidential, which in principle could bolster transparency in the process, but which has not yet been tested. The monitoring partners should keep data on this point, to understand the impact this annex has had on monitoring activities, and access to bidders' documentation.</p>		<p>required documents when requested. Although, the monitoring partners were denied access to the evaluation of tenders phase of procurement process as an independent observer. The monitoring partner made the case for attendance; however, they were unsuccessful. This constitutes a gap in monitoring the full procurement process, and constitutes a gap in transparency in the IP process.</p>		<p>bid is an objective criterion for selection. The MTLR team believes that over the course of data gathering activities, the monitoring partner should be able to understand if the project is delivered to a satisfactory standard for the quoted price.</p>	<p>step in advocacy efforts towards decision-makers to improve the public procurement landscape and make it easier to navigate a complicated landscape.</p>		<p>the IP activities, it is not clear if there have been outcomes in terms of awareness raised or transparency enhanced as a result.</p>
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Romanian Academic Society (RAS)	The IP was signed in the first half of 2018. Differences in interpretation of public procurement law and access of non-government/public authority partners to evaluation procedures. During negotiations, there was a request to sit in the evaluation of tenders; this was denied by Romanian authorities. Change in political administration meant that the approval of the IP had to be conducted again and signed off by the new Minister. IP text split in two - MoU between monitoring partner and CA on rights and responsibilities, and IP between (eventually) RAS, CA and contractor.	The relationship developed in the pre-tendering phase has enabled the CA and the monitoring partner to build trust and a mutual understanding of the goals of the IP.	The monitor reported that they needed a number of different functions in order to participate in the IP. Those functions available within RAS include the innovation and learning coordinator, project accountant and project management/coordinator, while the procurement and legal functions on the IP were outsourced to experts. The CA is satisfied the monitor has requisite expertise to conduct the monitoring activities on the IP.	At the time the MTLR was conducted, the procurement bids had not yet been evaluated. Information on IP was not posted with procurement documentation.	As with other recommendations from monitoring partners which may have an impact on cost-effectiveness in public procurement, it is not clear if this impact has yet been achieved. However, the monitoring partner has made some useful suggestions to the CA to avoid misunderstandings within the tendering and implementation processes, including, requiring bidders to outline the content of the survey they wish to implement for approval by the CA. The monitoring	The will to engage and make a success of the IP experiment is present at contracting authority level and monitoring partner level. While the political will of the CA is important, it is unclear to the MTLR team how the wider political environment is positioned or how willing other CAs are to replicate positive outcomes.	It is not yet clear how the monitoring partner plans to engage with affected communities.	The monitoring partner prepared and disseminated a promotional IP video which was viewed over 16,000 across 5 different platforms. In addition, the monitoring partner has posted articles to the project website which have not had many views (the highest number of views for any article was 107). While communications are a large part of the IP project in promoting transparency and raising awareness, it is unclear how these particular efforts are making a contribution to specific IP Project outcomes, in terms of who is being reached and what is the impact
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					partner should report on the impact of this suggestion once the survey has been finalised and launched.			of individuals being reached.
TI-Slovenia	The IP was signed in the second half of 2016. No end date has been provided for this IP, although a clause outlines that the IP can be unilaterally ended by one party. As such, it appears that goodwill is keeping the IP together, particularly since	According to interviews, the relationship pre-tender enabled the monitoring partner and the CA to develop a good relationship.	Both the monitoring partner and the CA report a good working relationship on the IP in terms of the monitoring activities. Furthermore, the monitoring partner reported having some of the necessary expertise to conduct their IP in-house (e.g. communication between IP participants, monitoring	The IP is not mandatory for bidders or successful contractors. The tender documents outlined that an IP was associated with the procurement process, but signing up to it was voluntary for the private sector. The IP was presented to private sector stakeholders, the	The potential cost savings/value for money to public procurement processes is not apparent to the MTLR team based on interviews and reporting; however, the monitor made a	The CA has shown commitment to the process, and the CA will start another IP project, which can demonstrate that there is political will to engage in the process. This does not preclude the fact	IP partners stated difficulty in engaging citizens, and the monitoring partner perceives that the public may not have the relevant expertise on the procurement subject matter. To date, engagement has come in the form of a billboard describing the	The planned website for the IP partner was delayed and has now been completed. The monitoring partner reported two articles, one posted to their website (no data on views) and another to the TI-S website (an

	<p>the CA is embarking on an additional IP. Negotiations between monitoring partner and the Ministry of Health took place over a couple of months. TI-Slovenia implemented a clause to ensure that not all documentation needs to be classified as confidential (Clause 18(3)).</p>		<p>report, data collection), while the technical expertise will need to be sourced from outside (e.g. energy efficiency expert, engineering expert and procurement expert).</p>	<p>monitoring partner drafted a brochure for the private sector, and promoted IP at Business Integrity Forum. Interviews did not reveal any specific questions, objections or queries relating to the IP as a result of sharing information in advance. As with other cases, e.g. Czech Republic and Latvia, it is unclear how the monitoring partner's approach has distinctly led to wider private sector engagement with the IP, or what this means for other IPs in engaging the private sector, but the selected contractor had no objections signing the IP.</p>	<p>recommendation to the CA to formulate the safety plan for the construction site, which is their legal duty, which could incur additional costs on the CA.</p>	<p>that the IP may also be used as a mechanism to enhance public standing of the CA.</p>	<p>project and contact information to inform on the progress of the construction work. The monitoring partner now plans to work with hospital staff as an affected community. The MTLR team has not seen any data on the effectiveness of the billboard campaign in raising awareness or capacity amongst citizens and has not seen an engagement plan from the monitoring partners.</p>	<p>estimated 1,170 views). As with other monitoring partners, the impact or effect of these communications activities on anticipated outcomes is unclear.</p>
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## ANNEX II - LIST OF INTERLOCUTEURS

Over the course of the MTLR, ODS conducted interviews with the following bodies/individuals listed in the table below.

Organisation	Country
<i>Project Coordination</i>	
TI-S	International
Directorate-General for Regional and Urban Policy, European Commission	European Union
<i>Monitoring partners</i>	
Action Aid	Italy
Amapola	Italy
Romanian Academic Society	Romania
Stefan Batory Foundation	Poland
TI-Bulgaria	Bulgaria
TI-Czech Republic	Czech Republic
TI-Greece	Greece
TI-Hungary	Hungary

TI-Italy`	Italy
TI-Latvia	Latvia
TI-Lithuania	Lithuania
TI-Portugal	Portugal
TI-Romania	Romania
TI-Slovenia	Slovenia
<b><i>Contracting authorities</i></b>	
Road Infrastructure Agency	Bulgaria
Ministry of Regional Development	Czech Republic
Region Calabria	Italy
Cadaastre	Romania
Ministry of Health	Slovenia
PKP Polskie Linie Kolejowe S.A	Poland
Ministry of Regional Development	romania
Riga Traffic	Latvia
<b><i>Bidders/Contractors</i></b>	

BDO-IT	Czech Republic
ZUE	Poland
EY	Italy
Contractor	Slovenia
<i>External experts</i>	
TI-Rwanda (Apollinaire Mupiganyi )	Rwanda
CoST (Petter Matthews)	UK
Open Contracting Partnership (Gavin Hayman)	USA
Universidad de Alcalá (Prof. Dr. Esteban Arribas Reyes)	Spain

## ANNEX III - ONLINE QUESTIONNAIRE

The following Annex provides an overview of the questionnaire by IP participant. ODS designed, collected responses and analysed three questionnaires, one each for monitoring partners, contracting authorities and contractors. However, the links to the questionnaires was issued by each monitoring partner, with the intention of having wider reach. In total, 6 individuals responded to the monitoring partner questionnaire, 6 responded to the contracting authority questionnaire and 7 responded to the questionnaire designed for bidders/contractors. Below we copy the questions by IP participant.

### Monitoring partners

1. To what extent do you agree with the following statements?

Statement	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	N/A
The integrity pact is the correct approach for monitoring this particular public procurement process						
A different approach other than the integrity pact would be more appropriate for this particular public procurement process						
Monitoring activities on the public procurement process as part of this integrity pact have been useful for learning						
Our monitoring team has appropriate financial resources to implement the integrity pact						
Before starting this project, our team already had expertise/knowledge of public procurement processes						
Involvement in this project has improved my team's knowledge and expertise in public procurement						
Our monitoring team has the required communications capacity						
We have been able to bring the required technical expertise to our monitoring team by hiring external experts						

Transparency International Secretariat is the appropriate body to lead the pilot project of the integrity pacts						
Our team is satisfied with the level of support from Transparency International Secretariat.						

2. Please elaborate on your response to the statement, “The integrity pact is the correct approach for monitoring this particular public procurement process.”

[Open text]

3. Please elaborate on your response to the statement, “Monitoring activities on the public procurement process as part of this integrity pact have been useful for learning.”

[Open text]

4. Please elaborate on your response to the statement, “Our monitoring team has appropriate financial resources to implement the integrity pact.”

[Open text]

5. Please elaborate on your response to the statement, “Our team is satisfied with the level of support from Transparency International Secretariat.” What, if any, additional support do you require from TI-S?

[open text]

6. To what extent have you engaged the public as part of this integrity pact?
- To a great extent
  - To a moderate extent
  - To a small extent
  - Not at all
  - Not yet

*If you answered “to a very great extent,” “to a great extent” or “to a moderate extent”, please explain how you have engaged the public.*

*If you answered “to a small extent” or “not at all”, please explain why you have not engaged the public. What are the factors which have led to little or no public engagement? What additional resources, experience, etc. do you need to engage the public?*

[open text]

7. What, if any, value is the monitoring partner adding to the public procurement process? Please provide an example.

[open text]

8. Do you have any other comment you would like to share?

[open text]

## Contracting authorities

1. To what extent do you agree with the following statements?

<i>Statement</i>	<i>Strongly agree</i>	<i>Agree</i>	<i>Neutral</i>	<i>Disagree</i>	<i>Strongly disagree</i>
We understand the objective of the integrity pact					
Our monitoring partner understands public procurement processes					
Our monitoring partner has good technical expertise and knowledge on the public procurement contract monitored					
Our monitoring partner has made good suggestions for the public procurement process linked to this integrity pact process					
Our involvement in the integrity pact is a time burden					
The integrity pact has created additional paperwork and reporting requirements for our team					
We need an integrity pact to enhance transparency and reduce inefficiencies in public procurement					
The integrity pact project has helped to increase transparency in this public procurement process					
The integrity pact has strengthened integrity capacity in our organisation					
The integrity pact has strengthened prevention, detection and solution of irregularities in targeted public procurement processes					
The integrity pact has increased trust between our organisation and the contractor					
The integrity pact has increased trust between our organisation and the public					
The integrity pact has led to reforms to other public procurement processes					
The integrity pact has resulted in concrete examples of improved procurement processes or improved value for money					

The integrity pact project has helped to create cost savings in this public procurement process					
The integrity pact project has helped to ensure the delivery of quality services in this public procurement process					
The integrity pact has helped us to improve our reputation with the public					
Implementation of the integrity pact is worth the effort considering the results					
We have been able to learn lessons from this integrity pact project which we will transfer to other procurement processes					
This integrity pact project can create change in public procurement processes in my country/region					
We have become champions of the integrity pact tool at our institution					
We feel a sense of responsibility for or ownership over the success of the integrity pact					

2. What benefit does the integrity pact bring for your contracting authority? [respondents can select multiple responses]

- The integrity pact supports us to do more to ensure transparency, accountability and integrity in public procurement than the minimum requirements in law
- We have already enhanced transparency in public procurement through the integrity pact
- We have received useful recommendations from our monitoring partner for increasing value in public procurement
- We have implemented recommendations from our monitoring partner for improving transparency, accountability and integrity in public procurement.
- We are learning new skills we would like to bring to other contracts
- The integrity pact brings reputational benefits to our organisation
- There is no benefit to the involvement of my organisation
- Other [please elaborate - open text]

3. In what way, if at all, has the integrity pact helped to increase trust between your organisation and the public?

[Open text]

4. What is the biggest success of the integrity pact, if any?

[Open text]

5. What is the biggest challenge you faced in implementing the integrity pact, if any?

[Open text]

6. What were your expectations from the integrity pact? Have these expectations been met so far?

[Open text]

7. Do you have any other comments?

[open text]

## Contractors

1. I have engaged in the integrity pact?

- Yes
- No

Why/why not? [Please state]

*If you have answered no, thank you for your participation.*

*If you have answered yes, please progress to questions 2, 3 and 4.*

2. To what extent do you agree with the following statements?

Statement	Strongly agree	Agree	Neutral	Disagree	Strongly disagree
We understand the purpose of the integrity pact					
The integrity pact project addresses a real need in my region/country/sector to fight corruption					
We understand why we should participate in an integrity pact					
We have a good relationship with the monitoring partner					
Involvement in the integrity pact adds an additional time burden to our work on the contract					
We feel a sense of responsibility for or ownership over the success of the integrity pact					

3. What benefits do you get from the integrity pact? [multiple selections]

- The integrity pact gives me a sense of security that the contract is managed in a clean and transparent way
- The integrity pact assures me that the contract was awarded fairly
- We are learning a lot about good practices in public procurement
- There is no benefit to my organisation's/company's involvement



- The integrity pact brings reputational benefits to our organisation
- The integrity pact demonstrates our commitment to conducting clean and ethical business
- The integrity pact helps us to better understand the risks in the public procurement process
- The integrity pact helps us to identify weaknesses and gaps in our existing processes and supports us to address them
- Other [please elaborate - open text]

4. What do you think is the added value of your involvement in the integrity pact, if any?

[Open text]

5. Do you have any other comments?

[open text]

## ANNEX IV - DOCUMENTS REVIEWED

Over the course of the MTLR, ODS consulted documents and resources provided by TI-S and found from other sources. The list below outlines the documents consulted for the purposes of this MTLR.

### *Project partner specific documents*

Action Aid	
Amapola	
TI-Bulgaria	
TI-Czech	
TI-Greece	
TI-Hungary	■ Reports 1-5
TI-Latvia	■ MEL planning documents
TI-Lithuania	■ Progress call minutes
TI-Poland	■ Lessons learned log
TI-Portugal	■ Non-KPI mid-term reporting
RAS	
TI-Slovenia	
TI-Italy	
TI-Romania	
TI-EU	■ Reports 1-4

### *TI-S produced documents*

- IP Project proposal
- IP Project narrative reports 1-5 to DG-REGIO
- TI-S internal document. Case Study: "Citizen engagement in five steps: How ActionAid Italy engage citizens in public procurement."
- Overall project level planning document
- Learning from project partners MTLR
- MEL guidance documents
  - Consolidated Partner logs
  - IP MEL Guidelines Background Material (Final)
  - IP MEL Guidelines Operational Guidance (Final)
  - IP MEL Logs Guidance
  - Theory of Change (Final)
- MTLR prepared annexes
  - Annex 1 Briefing a review of project MEL
  - Annex 2 IP MEL Guidelines Background Material Final
  - Annex 3 IP MEL Guidelines Operational Guidance Final revised
  - Annex 4 project achievements update
  - Annex 5 Italian replication
  - Annex 6 Integrity PActs Content March 2018
  - Annex 7 IP Outline Version 2.0
  - Annex 8 Slow Progress - Planning

- Annex 8c TI Romania and IPP Monitoring Checklist
- Annex 9a Monitoring Methodology TIBG
- Annex 10 Monitoring guidance
- Annex 11 Legal opinion on mandatory IPs
- Annex 12 challenges with engaging bidders
- Annex 13a Partners Social Accountability Assessment
- Annex 13b Social Accountability Models
- Annex 14a Writing a monitoring report ideas document
- Annex 14b Slovenia report original
- Annex 15a Communications presentation
- Annex 15b Further guidance on Comms
- Financial spend data to 31 October 2018

#### *Publications*

- Caldeira, R., and Werner, D. 2015. Are we on the road to impact? Transparency International Monitoring Guide. Available at: [https://www.transparency.org/files/content/ouraccountability/2015\\_TIMonitoringGuide\\_EN.pdf](https://www.transparency.org/files/content/ouraccountability/2015_TIMonitoringGuide_EN.pdf)
- Daka, A. et al. 2016. Integrity Pacts: A How-To Guide from Practitioners. Berlin: Transparency International.
- Marín, J. M., & Chêne. M., 2016. Evidence of citizen engagement impact in promoting good governance and anti-corruption efforts. 2016:21. Available at: <https://www.u4.no/publications/evidence-of-citizen-engagement-impact-in-promoting-good-governance-and-anti-corruption-efforts/>
- O'Donnell, M. 2015. Adaptive management: What it means for CSOs. Available at: [https://www.bond.org.uk/sites/default/files/resource-documents/adaptive\\_management\\_-\\_what\\_it\\_means\\_for\\_csos\\_0.pdf](https://www.bond.org.uk/sites/default/files/resource-documents/adaptive_management_-_what_it_means_for_csos_0.pdf)
- Olaya. J., 2013. Integrity Pacts in Public Procurement: An Implementation Guide. Berlin: Transparency International.

#### *Web resources*

- European Commission. 2017. "Single Market Scoreboard." Available at: [http://ec.europa.eu/internal\\_market/scoreboard/performance\\_per\\_policy\\_area/public\\_procurement/index\\_en.htm](http://ec.europa.eu/internal_market/scoreboard/performance_per_policy_area/public_procurement/index_en.htm)
- European Commission. N.D. "Anti-Corruption Report." Available at: [https://ec.europa.eu/home-affairs/what-we-do/policies/organized-crime-and-human-trafficking/corruption/anti-corruption-report\\_en](https://ec.europa.eu/home-affairs/what-we-do/policies/organized-crime-and-human-trafficking/corruption/anti-corruption-report_en)