Mid-term Evaluation
Mining for Sustainable Development

Revised Final Report | Brussels, 24 January 2018
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ACKNOWLEDGMENTS

The evaluators wish to thank Transparency International Secretariat (TI-S) and Transparency International Australia (TI-A) staff for their support and willingness to engage in an open and collaborative manner. We are especially grateful to the TI-S Programme Coordinator, [Name], as well as TI-A Country Project Coordinator, [Name], and Chapters Coordinators for their support.

For easier reading, a glossary follows below.

<table>
<thead>
<tr>
<th>Glossary</th>
<th>Definition</th>
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<tbody>
<tr>
<td>TI</td>
<td>Transparency International</td>
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<td>TI-A</td>
<td>Transparency International Australia</td>
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<td>TI-S</td>
<td>Transparency International Secretariat</td>
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<tr>
<td>M4SD</td>
<td>Mining for Sustainable Development</td>
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<td>GTNI</td>
<td>Global Thematic Network Initiative</td>
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<tr>
<td>BICA</td>
<td>Business Integrity Country Agenda</td>
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<tr>
<td>CEO</td>
<td>Chief Executive Officer</td>
</tr>
<tr>
<td>CSOs</td>
<td>Civil Society Organisations</td>
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<tr>
<td>DSP</td>
<td>Defence and Security Programme</td>
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<tr>
<td>EITI</td>
<td>Extractive Industries Transparency Initiative</td>
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<tr>
<td>GDP</td>
<td>Gross Domestic Product</td>
</tr>
<tr>
<td>HAIP</td>
<td>Humanitarian Aid Integrity Programme</td>
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<td>MACRA</td>
<td>Mining Awards Corruption Risk Assessment</td>
</tr>
<tr>
<td>MEL unit</td>
<td>Monitoring, Evaluation and Learning unit</td>
</tr>
<tr>
<td>ODS</td>
<td>Organisational Development Support</td>
</tr>
<tr>
<td>PHP</td>
<td>Pharmaceutical &amp; Healthcare Programme</td>
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<tr>
<td>PWYP</td>
<td>Publish What You Pay</td>
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EXECUTIVE SUMMARY

This report is the process evaluation of the M4SD - Mining for Sustainable Development Programme, implemented by Transparency International between January 2016 - November 2017. The programme review built upon interviews, desk research and case studies, and took place between September and November 2017. This summary sets out the main findings and recommendations of the review. The goals of the evaluation were as follows:

■ To provide an assessment of whether the programme assumptions are still current and whether the programme is on the right track to achieve impact.
■ To identify key challenges and successes in implementing Phase I activities and understand why they occurred in order to generate lessons learned and good practices.
■ To identify forward looking recommendations that can guide the programme and National Chapters in their interventions, and to further strategic and programme planning, design and management, including on the governance and management model of M4SD.

About the programme
The main objective of the programme is to increase transparency and accountability in the mining sector, at both national and global level, with an exclusive focus on mining contracts and awarding licenses. The implementation is led by Transparency International Australia (TI-A) with the support of the Transparency International Secretariat (TI-S). In Phase I, 20 national Transparency International Chapters participated in the implementation worldwide.

The programme is funded by grants from the BHP Billiton Foundation and to a smaller extent by the Department of Foreign Affairs and Trade (DFAT) of the Australian Government. Phase I of the programme took place between 2016-2017 and focused on assessing the risk of corruption in awarding mining sector licenses in the programme countries, using the Mining Awards Corruption Risk Assessment (MACRA) tool. MACRA was developed specifically to conduct these assessments, in dialogue with government, industry and civil society stakeholders. Phase II, planned to take place in 2018-2020, will build on the results of the assessments and implement national, regional and global strategies to achieve changes at policy level, to create an enabling environment for sustainable and accountable mining, and to positively influence practices in the mining sector.
Relevance
In each of the participating countries, a high share of GDP is represented by the mining sector. Therefore, the programme objectives to increase the transparency and accountability of the mining sector, and to bring about positive changes in policies and practices of the government, the private sector and civil society, are highly relevant given the impact of mining on the social and economic context in participating countries. The focus on one specific section of the mining value chain, that of awarding contracts and licenses, has been defined upon a mapping of other existing initiatives and taking into account of complementarity and contribution of TI to the work against corruption through the selection of a stage in the value chain where no initiatives were in place. The programme is internally coherent as the chosen activities and focus on stakeholder engagement serve the programme objectives. The programme has also enabled TI to strengthen its network of Global Thematic Network Initiatives.

The programme’s assumptions were defined at the development stage in a comprehensive way. Most of the assumptions have proven valid for Phase I, and remain valid for Phase II of the programme. As several of the assumptions concern the internal capacity of TI Chapters and the attitudes and abilities of stakeholders, it is important that advocacy in Phase II builds on a thorough assessment of these aspects in the participating countries.

Effectiveness
The delivery of the programme has been highly effective, with 18 out of 20 participating Chapters completing the research process and producing a country report to be used in Phase II. There was ambiguity surrounding the respective roles of the two parts of the team and the division of tasks in the first year. Therefore, the effectiveness of the governance and management structures and workflows between TI-S and TI-A can be improved for Phase II.

A detailed Monitoring, Evaluation and Learning (MEL) framework was developed for the programme to report at the Chapter and global levels in line with the TI Impact Framework. This framework will be used in reporting on Phase I and Phase II. Chapters also benefited from in-person meetings for exchanging experiences and best practices.

In communications and dissemination activities, the success of the Chapters ultimately depended on the pre-existing communications expertise within each country-level team. TI-A struggled to understand what capacity was available in each of the Chapters, and conversely, what type of support or training would be needed for improving communications. The mixed success of these activities highlighted the need for an in-depth capacity assessment on communications and outreach before the implementation of Phase II.
The overall management of Phase II would be facilitated by also including financial and project management in this capacity assessment.

Efficiency

Financial resources were efficiently used by the programme at the Chapter and global levels, with some underspend in the global programme. However, the funding structure (lump sum funding of the same amount to all participating Chapters) did not adequately reflect the disparities in pre-existing capacity, needs, and purchasing power across the 20 countries.

The programme had adequate human resources at the global level, although turnover in the team and the way in which shared working processes were defined between TI-S and TI-A have led to some challenges in using these resources efficiently. In addition, programme staff had to dedicate more time than originally foreseen to one-on-one communications activities with Chapters in order to ensure that activities and reporting were implemented coherently across all countries. At the Chapter level, a lack of capacity in financial and project management created difficulties for some participants. These challenges were largely unforeseen as no detailed capacity assessment was conducted at the beginning of the programme. Chapters hired external consultants, who had a key role in engaging stakeholders and using their connections, to lead the research. However, these consultants may not be involved in Phase II in all Chapters. As a result, Chapters could risk facing a loss of capacity and connections, particularly if they did not make specific efforts to transfer knowledge and contacts from the consultants to the permanent staff.

Sustainability

The programme created sustainable outcomes at the organisational and structural level. The two-phased structure of the M4SD programme could act as a blueprint for future GTNIs, aiding the leading Chapters in conceptualising and framing the work. The programme has created research outputs and a research framework. These are resources that can be used in the future for advocacy by Chapters and in similar TI initiatives (e.g. the BICA programme). The research framework could be adapted to similar programmes in other extractive industries (i.e. oil and gas) with limited additional investment of resources, as the stakeholders and risk context for these industries is quite similar to that of the mining sector. Stakeholder engagement at the Chapter level can also be used to support future advocacy initiatives.

The programmatic approach strengthened the expertise and internal capacity of TI-A by allowing it to build up a team and its position as a center of expertise on transparency and accountability in mining sector, with specific expertise on approvals. Participation in the programme has
strengthened Chapters’ networks and expertise, especially as a result of collaboration with external consultants.

Funding for Phase II has not yet been secured; however, at the time of writing the present report, a proposal was in progress for submission to the current donors. In addition to the current funders, TI was working on reaching out to additional potential donors for Phase II. These could include bilateral and multilateral donors, and private foundations, as well as industry representatives. National Chapters have also been encouraged to raise their own additional funds, but no overview of their progress was available.

**Implementing research components**

The implementation of the MACRA tool was adapted to the context of each individual country, which enabled the research to remain relevant to the specific needs of Chapters. The methodology could be re-adapted and used again in similar programmes concerning extractive industries, such as oil and gas, as these share similar regulatory and supply chains, as well as many of the specific types of risks.

Some Chapters encountered difficulties in recruiting and managing the external consultants who lead the research. Chapters with previous engagement in the extractive industries found it easier to access the right pool of candidates and could rely on recommendations from their peers. Pre-existing networks were also important in securing engagement from stakeholders. Several Chapters found the engagement of government and industry a challenge, and indicated that the timeframe of Phase I was too short to be able to build up the necessary relationships.

A good mix of secondary and primary data in assessing the risks for corruption in the process of allocating mining rights has been used for the production of the National reports. Chapters used mostly key informant interviews, roundtables and focus groups for primary data collection. One-on-one interviews were the preferred method of obtaining information according to the interviewed Chapters.

**Support to Chapters**

The most useful venues of supporting Chapters were the workshops, in-person meetings and one-on-one conversations to address specific issues with each of the Chapters. TI-A provided most support to the Chapters. There was limited contact and sharing of experiences amongst Chapters independent of TI-A’s intervention. This indicates that no separate network has yet emerged among the participating Chapters.
**Recommendations**

The review made a series of recommendations for the programme level as well as the Chapter level implementation. At the programme level the key recommendations are:

- To clarify the working processes and division of tasks between TI-S and TI-A.
- To engage with the new TI International Board on the project to raise internal visibility and garner continued support for the work in Phase II.
- For TI as a movement to develop a clear internal policy on working with private sector donors while maintaining the autonomy of TI internally and externally.
- To hire an additional coordinator for the team to ensure sufficient capacity for one-on-one support to Chapters.
- To set aside structured (ideally face-to-face) time for reflection and learning in the programme team (TI-A and TI-S) and with the Chapters, and to capture insights from these reflections in actionable points for what is relevant for Phase II but also for the other GTNIs.
- To carry out a thorough capacity assessment of the Chapters taking part in the programme. This assessment should cover the skills needed for implementing Phase II, including advocacy, communications and stakeholder management, the availability of pre-existing networks of experts, and the attitudes and abilities to act of stakeholders targeted by advocacy, in line with with programme’s assumptions. It should also cover the internal capacity of the Chapters to manage additional human and financial resources.
- To leverage the external network that the TI movement and members of the Expert Reference Group has access to, as well as industry events for strengthening outreach with government and industry networks.
CHAPTER 1 - INTRODUCTION

This document is the final mid-term process evaluation report of the Mining for Sustainable Development programme at Transparency International, performed by consultants from ODS, a Brussels based consultancy firm working with not-for-profit organisations.

1.1. Transparency International

Transparency International (TI) is a Berlin-based association under German law. The Berlin office functions as the Secretariat (TI-S) for a global movement of organisations or ‘Chapters’ working on transparency and anti-corruption. Each of these organisations is a separate legal entity allowed to carry the Transparency International brand in accordance with a bilateral licensing agreement. The overarching goal of Transparency International (which includes the Secretariat and the Chapters) is “to give a voice to the victims and witnesses of corruption [...] to work together with governments, businesses and citizens to stop the abuse of power, bribery and secret deals [...] and have] a world free of corruption.”

1.2. The Mining for Sustainable Development Programme

The Global Thematic Network Initiative

Following a decision by TI in 2013 as part of the 2010-2015 TI Global Strategy to decentralise some of the content expertise to TI Chapters, the Global Thematic Network Initiative (GTNI) brought together programmes with a global scope, led by a TI Chapter. Five thematic initiatives were chosen to be part of the GTNI programme:

1. ‘Humanitarian Aid Integrity’ (‘HAIP’) run by TI Kenya
2. ‘Integrity, Independence and Accountability of the Judiciary’ (‘the Judiciary’) at TI Romania
3. ‘Pharmaceutical & Healthcare’ (‘PHP’) at TI UK
4. ‘Defence and Security’ (‘DSP’) at TI UK
5. Mining & Corruption’ (‘Mining’) at TI Australia.

The GTNI is an objective of the movement under the Implementation plan of the 2015-2020 Strategy, “Together against corruption.”

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1 https://www.transparency.org/about
The Mining for Sustainable Development (M4SD) programme

The Mining programme under the GTNI, was named the Mining for Sustainable Development (M4SD) programme. It is implemented by a network of 20 TI Chapters, with TI-Australia (TI-A) as the global center of expertise on mining.

Figure 1 M4SD - TI Chapters involved

The main objective of the programme is to increase transparency and accountability in the mining sector, at both national and global level, with an exclusive focus on mining contracts and awarding licenses. While existing initiatives focus on revenues transparency and address broader governance issues in the extractive industry as a whole, M4SD addresses an existing gap by paying attention to the first stages of the mining value chain, when mining permits and licenses are granted. This focus is inspired by the lack of targeted advocacy and research initiatives on this section of the value chain, while comparable initiatives exist for later stages of the value chain, such as the Extractive Industries Transparency Initiative (EITI) or Publish What You Pay (PWYP) for the collection of taxes and royalties.\(^2\)

The programme, which is intended to run for five years, is structured in two phases:

- **Phase I** (2016-2017): the programme aims to assess the risk of corruption in the awarding of mining sector licenses in 20 countries, and to build the foundations for long-term stakeholder coalitions (e.g. between governments, NGOs, businesses) in the programme

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\(^2\) See [www.eiti.org](http://www.eiti.org); [www.publishwhatyoupay.org](http://www.publishwhatyoupay.org)
countries. The participating Chapters will produce a National Risk Assessment Report using the Mining Awards Corruption Risk Assessment (MACRA) tool, developed specifically to conduct these assessments. The National Risk reports, with the input of key stakeholders, will then feed into national action plans. At the same time, they will constitute the basis for a Global Analysis report.

- **Phase II** (2018-2020): the objective is to build on the assessment from Phase I and implement the national, regional and global strategies to create changes to policy and practice in selected countries and globally to increase transparency and accountability in awarding mining sector permits, licenses and contracts. Representatives of governments, the mining industry and civil society organisations will continue to be engaged in the process and the capacity of TI Chapters to advocate individually and collectively will be further enhanced.

**Theory of Change & programme objectives**

The programme’s Theory of Change centers on using research and multi-stakeholder engagement for building an evidence base and a shared understanding of the risks of corruption and a shared commitment to a collective goal “that ultimately any mining should benefit a country’s social and economic development – will contribute to a positive change of attitude towards a corruption-free mining sector.”\(^3\) The Theory of Change is well aligned with the strategy of Transparency International and the programme objectives are coherent with it.

The current programme objectives, outlined in the programme proposal, have been revised in consultation with the Chapters, at the first cross-regional workshop after the start of the programme, in October 2016. These objectives, related to the entire programme, are:

1. Governments make decisions about approving mining activities in the public interest based on sound land use and governance principles, including Free Prior Informed Consent.
2. Mining enterprises make applications for mining licenses/permits based on sound processes and genuine consultation with communities as legitimate stakeholders and this becomes part of the social license to operate.
3. Mining-affected communities have a legitimate role and participate effectively in decision-making about mining activities.
4. TI chapters and civil society are able to hold government and industry to account for decisions about mining approvals

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\(^3\) Programme Grant Application
Operations

- Phase I Programme budget
  - €2,287,48 BHP Billiton Foundation
  - €227,500 Department of Foreign Affairs and Trade of the Australian Government

- Programme Period
  - Phase I: January 2016 until 31 December 2017
  - Phase II: January 2018 until 31 December 2020

- Programme Team

The Programme is coordinated by TI Australia. The table below outlines team roles and main responsibilities.

<table>
<thead>
<tr>
<th>Role</th>
<th>Main responsibilities</th>
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<tbody>
<tr>
<td><strong>Executive Director (0.5 FTE)</strong></td>
<td>Programme oversight, High-level advocacy, Resource mobilisation</td>
</tr>
<tr>
<td><strong>Programme Manager (1 FTE)</strong></td>
<td>Providing sector expertise, Manage Programme delivery and resources, Building relations with stakeholders, Help secure additional funding</td>
</tr>
<tr>
<td><strong>Finance and Admin Coordinator (1 FTE)</strong></td>
<td>Establish and maintain internal financial systems, Liaise with Finance staff at TI-S, Coordinate national Chapter financial reporting, Manage programme expenditure</td>
</tr>
<tr>
<td><strong>Research and Policy Coordinator (1 FTE)</strong></td>
<td>Coordinate Programme’s research activities, Liaise with external researcher and experts, Lead on global research data</td>
</tr>
<tr>
<td><strong>Advocacy and Communication Coordinator (1 FTE)</strong></td>
<td>Development of communication plans and products, Identify communication and advocacy opportunities, Advise and support Programme and TI Secretariat fundraising staff on material to be used for engagement with potential donors.</td>
</tr>
<tr>
<td><strong>Country Projects Coordinator (1 FTE)</strong></td>
<td>Coordination and support of the Programme Chapters, Monitor implementation of agreed plans, Coordinate overall reporting to donors, Facilitate knowledge sharing and learning across Chapters, Contribute to development of funding applications</td>
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4. In Phase I, the Programme is expected to also receive support from the Australian Department of Foreign Affairs and Trade (DFAT) that has committed AUS$ 350,000 (approx. EUR 245,000) to support implementation in the Indo-Pacific region. According to TI M4SD Original Proposal
8. Position planned from year 2 of the project.
<table>
<thead>
<tr>
<th>Role</th>
<th>Main responsibilities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>TI Secretariat</strong></td>
<td></td>
</tr>
<tr>
<td>Programme Coordinator (1 FTE)</td>
<td>■ Coordinating TI-S support</td>
</tr>
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<td></td>
<td>■ Grant management and programme oversight</td>
</tr>
<tr>
<td></td>
<td>■ Building programme management capacity TI-A</td>
</tr>
<tr>
<td>Coordinator Research &amp; Policy (0.2 FTE)</td>
<td>■ Coordinating development of Risk assessment tool</td>
</tr>
<tr>
<td></td>
<td>■ Coordinating global risk assessment</td>
</tr>
<tr>
<td></td>
<td>■ Provide research advice to TI-A</td>
</tr>
<tr>
<td>Communications department (0.2 FTE)</td>
<td>■ Communications &amp; advocacy support</td>
</tr>
<tr>
<td>Coordinator, Finance &amp; Accounting (0.3 FTE)</td>
<td>■ Programme finance quality control</td>
</tr>
<tr>
<td>MEL Department (no information on %FTE)</td>
<td>■ MEL support</td>
</tr>
<tr>
<td>Advocacy and governance unit (no information on FTE)</td>
<td>■ Global advocacy and governance support</td>
</tr>
<tr>
<td>Legal Department (no information on %FTE)</td>
<td>■ Legal support</td>
</tr>
<tr>
<td>Global Security Manager (0.1 FTE)</td>
<td>■ Security support</td>
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<table>
<thead>
<tr>
<th>Role</th>
<th>Main responsibilities</th>
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</thead>
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<tr>
<td><strong>Implementing Chapters</strong></td>
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<tr>
<td>Chapter Coordinator</td>
<td>Each involved Chapter nominated a coordinator from existing staff, responsible for implementing the programme in the country on a day-to-day basis. This role was complemented by a researcher responsible for the research component.</td>
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</table>
1.3. The Evaluation

Methodology & Approach
In September 2017, ODS was selected to perform the mid-term process evaluation of the M4SD Programme between September and October 2017. Based on the Terms of Reference and ODS’ work offer, the following activities took place to collect evidence and analyse the information. These were:

<table>
<thead>
<tr>
<th>Information gathering</th>
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<tr>
<td>■ Briefing meetings with TI staff</td>
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<td>■ Desk research: review of programme documentation and Chapter level reporting</td>
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<tr>
<td>■ 11 interviews with TI-A and TI-S staff</td>
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<tr>
<td>■ 11 interviews with members of the External Reference Group, Chapters coordinators, researchers</td>
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<tr>
<th>Analysis</th>
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<tbody>
<tr>
<td>■ Process and Programme implementation mapping</td>
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<td>■ Brief case studies</td>
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<tr>
<td>■ Timeline</td>
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<tr>
<td>■ Organisational assessment</td>
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<tr>
<th>Reporting</th>
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<tbody>
<tr>
<td>■ Draft conclusions and recommendations</td>
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<tr>
<td>■ Presentation of the preliminary findings and discussion</td>
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<td>■ Final report</td>
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<td>■ Workshop presentation</td>
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Limitations
The data and analysis in this report are based on the best available information. Besides the final report, the evaluators illustrated the work of three Chapters in the case studies to shed light on some of the challenges and successes in more detail, and produced a mapping of work processes and roles related to the programme management, at TI-A and TI-S level. Over the course of the process evaluation, the project team encountered some Chapter Level and Programme Level limitations (elaborated upon below).

Chapter level limitations:

- Although the amount of interviews was adequate for an evaluation of this scope (22 in total), we did not manage to talk to all Chapters initially included in the interviewee list. In particular, the two Chapters which did not complete the risk assessment were unavailable for interview, thus limiting the available evidence on the challenges met by these Chapters.

- Data on outputs and outcomes of Phase I are collected by the national Chapters through the submission of outputs, quarterly reports, face-to-face meetings and individual follow-up. These data were compiled by the programme staff upon receipt. It was not possible to collect data on some activities planned for Q3 and Q4 of 2017 (e.g. National Risk Assessments, publication and launch of national findings and action plans). The timeline of
the evaluation did not allow for the first Chapter level monitoring results against the programme change markers as defined in the programme MEL plan, which was planned to be completed in November 2017.

In the initial work proposal, submitted by the evaluators, case studies were expected to be produced during field visits. However, field visits were not possible due to the time constraints of the review. The case studies were therefore based on limited sources: desk research and an interview with the programme coordinator of the selected Chapters.

Programme level limitations:

- The evaluators had limited access to written or oral institutional memory on some aspects of the planning and implementation of the global programme. Some of these aspects included high-level decisions about leadership or the selection and assessment of countries that were participating in the programme. The Interim Internal Managing Director was not available for interview in the review period. Views from the TI-A Board were gathered from the Chair of the Board’s Mining Committee. The TI International Board was not available for interview as the re-election process of the Board was in course while the review was taking place.

Research questions

As the evaluation focused on the process of setting up and implementing Phase I of the programme, impact considerations were outside the scope of the review. The programme is still in its initial phase of implementation, making an impact review of limited relevance to understanding its value.

Based on the programme documentation, briefing meetings, the ToR and ODS’ work offer, a matrix was developed with core research questions. These questions were subsequently adapted to the different interviewee categories (Programme Team, Chapter coordinators, Researchers, Member of the External Reference Group).

Interview questions and the structure of this report were derived from this matrix. The most important research questions agreed upon by TI and the evaluators were phrased as follows:

- Relevance: are the objectives of the programme still appropriate?
  - And were the planned activities consistent with the objectives?
  - Did the programme design correspond to the problem you want to solve (TI, target audience, donor)?

- Effectiveness: was the programme effective?
  - To what extent were the initial objectives achieved?
Efficiency: was the programme implemented in an efficient way?
  ○ Were human and financial resources adequate to the development of the programme?
  ○ Operations/organisation: how was the programme organised and managed?

Sustainability: is the programme sustainable?
  ○ Are its outputs sustainable?

Research, Stakeholder engagement, Development of action plans and Communications
  ○ How did Chapters manage these processes and what was challenging and successful?
  ○ What further capacity assessment and support would be required?

Programme Support to Chapters:
  ○ Has capacity of the national Chapters improved through this programme?
  ○ Has a network emerged among the programme countries?
  ○ How is this programme related to the regular work at the national level?

2. CHAPTER 2 - PROGRAMME REVIEW

2.1. Relevance

Relevance assesses whether the programme serves the priorities of target groups, the implementing organisation and the donor.\(^\text{10}\)

The overarching vision of the programme, according to the proposal, is to “enhance the contribution of mining to sustainable social and economic development.” This aim is highly relevant given the impact of mining on the social and economic contexts in the participating countries, as evidenced by the high share of GDP represented by this sector in each country.\(^\text{11}\) The focus on one specific section of the mining value chain, that of awarding contracts and licenses, was decided based upon a mapping exercise of other existing initiatives. The programme is implemented at a stage in the value chain where no other initiatives are in place, and therefore complements and contributes to other

\(^{10}\) Assessment categories are defined according to the OECD DAC guidelines, see http://www.oecd.org/dac/evaluation/daccriteriaforevaluatingdevelopmentassistance.htm

\(^{11}\) For instance, in 2014 metallic mineral and coal production represented 27.5% of GDP for the Democratic Republic of Congo; 38.1% for Mozambique and 53.6 for Sierra Leone. (Source: International Council on Mining and Metals, Mining Contribution Index 2016.)
work undertaken against corruption across the value chain. This vision has remained relevant to stakeholder engagement for transparency in mining since the programme’s inception, as no concurrent initiatives have been created. Chapters which decided to join the programme are situated in countries where mining is a key industry, and accountability in the sector is considered a key area for engagement by TI. Therefore, interviewees felt that the objectives of the programme are well aligned with the advocacy priorities of the participating Chapters.

The activities (research, stakeholder engagement and advocacy) were coherent with pursuing the overall programme objectives. In addition, the research component contributes to the global evidence base for advocacy around corruption risks in the mining awards process. It also offers an opportunity for TI to engage in advocacy around a global industry that it had not covered before. Finally, the initiative, being a GTNI, is well aligned with the strategic thinking in TI, which aims to strengthen the role of Chapters in leading global programmes.

**Validity of programme assumptions**

The assumptions of the programme were laid out in the logframe at the outset. These assumptions were comprehensive and covered the relevant areas of uncertainty relative to stakeholder engagement, internal capacity and management. The evaluation interviews were useful in validating several of the assumptions, which continue to bear relevance for Phase II. The only assumptions which have shown limited validity were those related to the ability of TI Chapters to implement the mapping, access to information and the availability and use of reporting mechanisms. The validity of assumptions for Phase II can be strengthened by performing a careful capacity assessment of the implementing Chapters and by encouraging the Chapters to map out and critically examine the attitudes and abilities to act of their advocacy targets before defining advocacy strategies.

**Table 1 Overview of programme assumptions**

<table>
<thead>
<tr>
<th>Assumption</th>
<th>Validity of the assumption in implementing Phase I</th>
<th>Relevance of the assumption for Phase II</th>
</tr>
</thead>
<tbody>
<tr>
<td>TI chapters have the expertise and resources required to implement the initial ‘mapping’ exercise and/or any other research that may be required.</td>
<td>Limited - No systematic capacity assessment of Chapters was carried out at the beginning of the programme. Only a few TI Chapters had encountered significant challenges in implementing the research and the mapping. However, most Chapters relied on external researchers to perform the research components and several of them found that their internal capacity and expertise need to be further strengthened to be able to effectively engage in Phase II.</td>
<td>Systematically assessing the capacity and expertise of Chapters to engage in Phase II will be crucial in understanding which Chapters face higher risks of challenges in implementation, and where further thematic and methodological capacity building may be required.</td>
</tr>
<tr>
<td>TI chapters have the skills, channels and resources required to communicate any research findings, and the impact of corruption at the permit, license and contracts state, effectively to different groups of stakeholders.</td>
<td>High - In Phase I Chapters implemented communication and dissemination activities to a limited extent, as the focus was on the research. In stakeholder meetings, Chapters felt that they were able to communicate the goals and findings adequately.</td>
<td>There are important differences in the communications capacities of the Chapters. These have not been mapped in advance of Phase I, but having a clear understanding of the Chapters capacity and needs will be crucial for a successful implementation of</td>
</tr>
<tr>
<td>Stakeholders/ Target Audiences</td>
<td>Phase II</td>
<td>Programme Management</td>
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<td>------------------------------------------------------------------------------------------------</td>
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<td>---------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>TI chapters and other concerned stakeholders have or will be given access to any relevant data and other information required for research.</td>
<td>Limited - Several Chapters encountered challenges in gathering insights from interviews.</td>
<td>The leadership of TI Australia remains fully committed to leading the implementation of this Programme.</td>
</tr>
<tr>
<td>A lack of evidence (vs. e.g. a lack of political will or priority given to economic business interest) is shown to be one of the key factors preventing greater stakeholder engagement in relation to corruption in the permits, licenses and contracts stage.</td>
<td>High - Phase I has acted on creating the evidence base for stakeholder engagement in Phase II. While the research process was a useful venue for engaging stakeholders, there is no sufficient evidence at this point which suggests that additional information on corruption will remove a key barrier to engagement.</td>
<td>The assumption remains highly relevant for Phase II, where advocacy built on the research performed in Phase I will offer further insight into the impact of an increased evidence base on stakeholder engagement.</td>
</tr>
<tr>
<td>Stakeholder attitudes and abilities</td>
<td></td>
<td></td>
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<tr>
<td>Concerned stakeholders (including victims and witnesses of corruption) have access to safe anti-corruption reporting mechanisms, and are not afraid to disclose relevant information.</td>
<td>Limited - In many of the programme countries, access to corruption reporting mechanisms is limited and witnesses and victims of corruption are often not willing to disclose relevant information. However no mapping was made of the available reporting mechanisms as part of the research in Phase I.</td>
<td>In Phase II, advocacy goals and planned activities will benefit from taking into account the available reporting mechanisms and, if relevant, targeting the attitudes of victims and witnesses of corruption towards reporting.</td>
</tr>
<tr>
<td>Stakeholders understand and claim their right to information and the obligations of governments and industry to act transparently.</td>
<td>No evidence yet, as advocacy was not the focus of Phase I.</td>
<td>This assumption remains valid for Phase II. Implementing Chapters should gain an understanding of the attitudes of stakeholders at the start of Phase II to help their advocacy planning.</td>
</tr>
<tr>
<td>Stakeholders, including other non-governmental/civil society organisations and sector/extractive industry initiatives, are willing to join TI in developing and implementing joint advocacy campaign</td>
<td>No evidence yet, as advocacy was not the focus of Phase I.</td>
<td>This assumption remains valid for Phase II. Implementing Chapters should gain an understanding of the attitudes of stakeholders at the start of Phase II to help their advocacy planning.</td>
</tr>
<tr>
<td>Shareholders, investors and other</td>
<td>No evidence yet, as advocacy was not the focus of Phase I.</td>
<td>This assumption remains valid for Phase II. Implementing Chapters should gain an understanding of the attitudes of stakeholders at the start of Phase II to help their advocacy planning.</td>
</tr>
<tr>
<td>Requirement</td>
<td>Phase I</td>
<td>Phase II</td>
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<tr>
<td>----------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------</td>
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<tr>
<td>Key pressure groups are willing to advocate for adoption and effective</td>
<td>Implementing Chapters should gain an understanding of attitudes of</td>
<td>Implementing Chapters should gain an understanding of attitudes of</td>
</tr>
<tr>
<td>enforcement of national and international anti-corruption standards in the</td>
<td>stakeholders at the start of Phase II to help their advocacy planning.</td>
<td>stakeholders at the start of Phase II to help their advocacy planning.</td>
</tr>
<tr>
<td>mining sector.</td>
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<tr>
<td>Governments are not hostile to and/or clamp down on any anti-corruption</td>
<td>No evidence yet, as advocacy was not the focus of Phase I.</td>
<td>This assumption remains valid for Phase II.</td>
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<tr>
<td>efforts.</td>
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<tr>
<td>Industry stakeholders do not resist the Programme as interfering with their</td>
<td>High - Some Chapters reported challenges in engaging with industry</td>
<td>This assumption remains valid for Phase II.</td>
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<tr>
<td>business interest.</td>
<td>stakeholders. However the assumption remains highly valid and a key</td>
<td>Implementing Chapters should gain an understanding of attitudes of</td>
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<td></td>
<td>condition of success for Phase II.</td>
<td>industry partners at the start of Phase II to help their advocacy</td>
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<td></td>
<td></td>
<td>planning. Phase II can still involve research activities, although</td>
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<td></td>
<td></td>
<td>these will not constitute a central focus.</td>
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<tr>
<td>Relevant international and multilateral stakeholders are supportive of the</td>
<td>High - The programme has started to explore synergies with other</td>
<td>This assumption remains valid for Phase II.</td>
</tr>
<tr>
<td>Programme at national, regional and global level.</td>
<td>international and multilateral stakeholders already in Phase I.</td>
<td>The implementing Chapters will benefit from a strategic approach to</td>
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<td></td>
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<td>strengthening and leveraging these partnerships in Phase II.</td>
</tr>
<tr>
<td>A critical mass of governments is willing to work with TI to review legal</td>
<td>No evidence yet, as advocacy on specific legal frameworks was not the</td>
<td>This assumption remains valid for Phase II.</td>
</tr>
<tr>
<td>and regulatory frameworks.</td>
<td>focus of Phase I.</td>
<td>However, the programme can have positive impact already if governments</td>
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<td></td>
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<td>in a smaller subset of countries work effectively together with TI</td>
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<td></td>
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<td>on their regulatory frameworks.</td>
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</table>
2.2. Effectiveness

A review of effectiveness assesses the extent to which the activities of the programme have been implemented at the level of the global programme (global research report, governance, organisational structure and management) as well as at the Chapter level (recruitment of researchers, research outputs).

There was a delay in the initial phase of the programme, due to the recruitment and induction of the global programme team. In addition, some Chapters encountered delays in implementing the research. Despite these delays, the programme has been effective in producing the research outputs that were planned in Phase I, both at Chapter and the global level. Eighteen of the 20 participating Chapters have been successful in producing a country report within the deadline for it inclusion in the global report.\(^\text{12}\) This is a positive outcome if the timelines and the challenges of the implementing Chapters are taken into account. In addition, the programme secured a wide geographical coverage and included Chapters of a range of sizes and abilities for which work in the mining sector was highly relevant. The programme has furthermore been successful in developing a research methodology (the MACRA “tool”), organising events that built the capacity of participating Chapters and implementing the framework in the participating countries.

In addition, the programme has created the support structures and provided Chapters with methodological and implementation guidance, as foreseen in the original planning (for an analysis of these structures, see Section 3 of this report).

Chapters themselves have had some challenges with some of the implementation components, such as recruitment of researchers and multi-stakeholder engagement. These are covered in detail in Chapter 3.

<table>
<thead>
<tr>
<th>Chapter Outputs</th>
<th>Global Outputs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stakeholder analysis</td>
<td>MACRA tool</td>
</tr>
<tr>
<td>Completed Q3</td>
<td>Completed</td>
</tr>
<tr>
<td>National Corruption Risk Assessment Report</td>
<td>Fully established TI Australia Programme team</td>
</tr>
<tr>
<td>Completed: Q7</td>
<td>On track - capacity assessment done and plan under implementation</td>
</tr>
<tr>
<td>National action plans</td>
<td>Global analysis report</td>
</tr>
<tr>
<td>Completed Q7</td>
<td>Completed</td>
</tr>
</tbody>
</table>

\(^{\text{12}}\) The original project proposal mentioned the involvement of approximately 25 countries in the programme, with approximately 10 continuing to Phase II (p.11).
Management structures - Relationship between TI-A and TI-S

Despite the original concept that GTNIs would be managed by a Chapter, TI-S has had a substantial role in the inception and management of the work in the context of the M4SD programme. The reasons for this were twofold. Firstly, TI-S holds and administers the grant from BHP Billiton Foundation, which is received by the Chapters in the form of sub-grants. TI-S is therefore ultimately accountable to the donor and, in this capacity, is involved in all processes and decisions about the grant agreement. This role is unlikely to change in Phase II as TI-A is not legally able to receive the funds. Secondly, TI-S was involved in the management of the programme at the beginning, as the Australian Chapter was still in the process of being set-up. These reasons together have resulted in a stronger role for TI-S than originally envisaged.

As a result, the GTNI has a structure with complementary functions and responsibilities in TI-S and TI-A. This setup was needed and effective at the beginning of the programme when TI-A staff was being recruited and went through induction, and reflecting the legal responsibility of TI-S for the contract with the donor. In some processes the support from TI-S was particularly effective as it offered expertise or support that was not available in TI-A. An example of this is the development of the research tools, or financial and accounting support so long as TI-A did not have sufficient capacity at the time of setting up the programme.

The question that the TI-A/TI-S team is facing is how to adapt the system to the new capacity and expertise that is now available in the host Chapter. The two teams currently do not have an agreed and adhered to division of tasks spelling out the modalities of cooperation between each of the mirrored functions; and the concrete tasks for the TI-S services (e.g. legal, MEL and SAFE). This lack of clarity has led to some challenges in terms of effectiveness (making sure that decisions are taken in a timely and meaningful manner) and efficiency (best use of resources/time).

The unclear division of responsibilities has resulted in some inefficiencies. For example, the TI-A team members often receive guidance and suggestions on outputs and processes from TI-S; however, it is unclear whether or not these are binding. In addition, it is also unclear where the power to decide which suggestions to take on board ultimately lies. Annex III on working processes illustrates this in further detail and makes specific recommendations for three processes highlighted by the team.

Communications around these processes has not always been clear. Both sides reported a lack of clarity in the respective roles of staff members in decision making, approval and communication

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13 See the overview of roles and responsibilities in the introduction on pages 11 and 12
towards the Chapters. Some additional friction was created by TI-A introducing a system for storing and managing information which was not connected to the movement-wide systems also used by TI-S. This resulted in inefficiencies in knowledge sharing as documents had to be individually shared. The team has decided that this will be replaced with the use of Microsoft 365 for Phase II.

Finding a collegial and pragmatic solution to these issues of responsibility and process management is crucial for Phase II of the programme. Although there is willingness to find remedy to the tensions within both of the involved teams, no concrete steps have yet been taken to negotiate and overcome these challenges. The review of working processes attached to this evaluation illustrates the sticking points and some possible solutions.

**Governance**

The International Board of the movement is involved with the programme only to a limited extent. The Mining Committee of the Board of TI-A played an important role in preparing the recruitment and induction of the project team in the Chapter. Currently, there is no formal agreement about the role that either of the Boards is expected to play in taking strategic decisions about the GTNI programme. Establishing these roles would help make the decision-making structure of the programme more transparent and effective.
Figure 2: Organigramme of the team in TI-A

TI-A

Executive Director
50% FTE

Programme manager
100% FTE

Country Project
100% FTE

Admin and Finance
100% FTE

Policy and Research
100% FTE

Advocacy and Communications
100% FTE

= Staff member replaced during Phase I

= Staff member recruited at a later stage during Phase I

Figure 3: Organigramme of the team in TI-S

TI-S

TI International Board
(Overseeing TI-S and Chapters)

Director of organisational development
20% FTE

Regional Advisors
Advise

Programme coordinator
80% FTE

Finance and Accounting
30% FTE

Research and Policy
20% FTE

Communications
20% FTE

MEL

Legal service

Global Security Manager

= Position not maintained throughout the programme

Reporting, monitoring and learning

The global programme submits reporting according to the logframe designed in the proposal. Indicators and outcomes were used consistently, and lessons learned were identified. The logframe did not go through reviews or adaptations throughout the implementation period.
Chapters have found the quarterly reporting somewhat burdensome. Our assessment of the reporting template is that it is an open and flexible template, commensurate with the scale of funds received. TI-S has taken some steps to simplify the financial reporting process and tools. Overall, reporting according to the currently used templates reflects the accountability needs of TI without placing an excessive burden on the Chapters.

At the time of writing the evaluation report, the team is in the process of finalising the MEL framework that will be used for monitoring the programme. The MEL is structured in line with the TI Impact framework and is supported by a clear division of tasks between the Chapters and the M4SD Programme team. It is planned that the monitoring will be streamlined with the quarterly narrative reporting for Q2 and Q4 of each year and enable Chapters to report on the range of advocacy activities that are planned to be implemented under Phase II.

Defining indicators and tracking outcomes for advocacy programmes is often challenging. The project can already rely on a well-structured framework and change markers for tracking outcomes, in line with the movement’s MEL practice. Having an accurately used MEL framework that can track advocacy outcomes effectively in Phase II will be of great added value to all participating Chapters. However, the effective use of these frameworks will ultimately depend on MEL capacity, which the project team felt will likely need strengthening in several of the Chapters.

Finally, there have been few formal exchanges of experience among the GTNIs programmes. Creating a structure for the GTNIs to exchange best practices and experience of challenges would constitute a significant added value for the movement.

2.3. Efficiency

This section assesses the use of the resources of the programme in relation to the achieved results. It covers financial and human resources, but also management and the relations between TI-S and TI-A.

Financial resources: Chapters

To support activities for Phase I, each Chapter received a total of EUR 35,000, split in four different budget lines: in-country researchers, multi-stakeholder roundtables, Chapter travel in-country or for horizontal exchanges, contribution to staff time dedicated to the programme. An additional grant up to EUR 6,000 was made available to Chapters in Q3 and Q4 of 2017 to support the publication and launch of national reports and the development of National Action Plans, not covered by the original grant.
Data from interviews with Chapters suggested that the funding is considered, on average, appropriate to the type of outputs requested, and a few Chapters even made savings or underspent the money allocated to them. The majority of the Chapters appreciated the flexibility of managing the budget allocated for each country and the possibility to choose the transfer schedule; in only a few cases this translated into insufficient clarity on when the funds would be wired.

However, the allocation of the same lump sum figure to each of the Chapters did not adequately respond to the resource needs of all. While this choice could have been made to ensure fairness and to simplify a complex process of reporting, it did not take into consideration the differences in local purchasing power, human resources costs for coordinators and researchers, or additional costs such as banking transactions. Very few resources were provided to Chapters to cover human resources and overheads. In some cases the project funding only covered a small part of the costs of a coordinator. As a result, some Chapters could not recruit suitable staff to the project when they did not have the available requisite staff profiles already in place. Chapters with less internal capacity struggled more in providing adequate support to the programme activities and would have benefited from having had a budget line for a dedicated staff member to oversee the implementation.

**Financial resources: Global**

Some underspend occurred in the budget. However this is mainly due to the late recruitment of Programme staff at TI-A level, and is not due to additional savings related to the administration of the project.

**Financial reporting**

The financial reporting has been challenging for some of the Chapters. In the current set-up, Chapters report on a quarterly basis with both narrative and financial information. However, despite the efforts made by TI-S to provide Chapters with clear and user-friendly templates and guidelines, often translated in more than one language, the process is still not completely efficient as the reporting often necessitates several rounds of individual follow-up between Chapters and TI-S. This causes delays and duplication of work at the Programme administrative level. In some cases, this is due to the fact that the administrative capacity demanded by the programme was not available in all Chapters, and Coordinators conducted the financial reporting where they had limited expertise. For Phase II, capacity for financial reporting and overall project management should be assessed before implementation. This will enable TI to see where there is a need to invest in strengthening core organisational functions.
**Human resources**

The GTNI programme is led by TI-A. Therefore, most of the roles are situated within TI-A, under the leadership of the CEO of TI-A.

The programme has 5 full-time staff members in TI-A:

- Programme Manager\(^{14}\)
- Country projects Coordinator
- Research and Policy Coordinator
- Communications and Advocacy Coordinator
- Finance and Administration Manager

In addition, a programme coordinator and a project accountant work on the programme in TI-S. It is also being supported by the in-house services at TI-S, such as communications. At the inception phase of the programme, a senior leadership role was also situated in TI-S, but after the departure of the staff member, this role was not filled again.

The programme has been affected by considerable turnover in TI-A (where the Executive Director and Financial Coordinator were replaced in the period under review, and the Programme Manager left the organisation during the time that this review was conducted) and TI-S, as well as the restructuring process which is currently underway at TI-S. The redundancy process which took place at the same time resulted in not having an Organisational Development Unit within TI-S, which was originally planned to oversee all Global Initiatives. It was unclear whether this was a conscious strategic decision from the movement, as the current team members were not able to comment on the reason for this change, and it appeared that no formal handover of the senior management and representative responsibilities was made to any of the team members until much later. This change created a lack of continuity in the strategic guidance of the programme, and may have decreased the visibility and traction of the programme within TI. The turnover and late recruitment of staff resulted in an increased workload for the rest of the team. The high number of one-on-one conversations and individual follow up needed to effectively engage Chapters and support delivery, and resulted in a high workload for the research and Country Project coordinators. Significant strain on staff members can be expected during the implementation of Phase II when even more individual support needs are expected to allow for the differences between the action plans and country contexts, in the absence of additional human resources.

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\(^{14}\) The current Programme Manager resigned in September 2017.
Management of the programme

The management of the programme cannot be separated from the organisational strengthening of TI-A. Setting up the GTNI also required the recruitment and induction of the team at TI-A. Considerable progress has been made on this front, for instance in drafting internal policies. It is expected that all organisational strengthening processes are completed within the next 6 to 12 months, which will be key to an efficient management of Phase II.

Thanks to the commitment and time investment of the staff at TI-A and support from TI-S, the programme managed to meet main reporting and implementation deadlines with only minor delays. However, this resulted in a very high workload for the staff, which is unsustainable in the long term.

At the country level, some Chapters encountered challenges related to project management. This was particularly true for some comparatively less established Chapters with fewer human resources. In Chapters with few non-M4SD staff or limited expertise in the mining sector, the programme could rely on limited external expertise within these Chapter beyond the coordinator in managing the researchers and the stakeholders to the time and cost constraints. As no in-depth capacity assessment was performed at the start of the programme, these challenges could not be foreseen and support could only attempt to mitigate the resulting delays and inefficiencies. For this reason, Phase II would benefit greatly from an in-depth assessment of the capacities of each Chapter to perform and manage the advocacy programmes.

The challenges in project management likely originated in the initial Chapter selection phase of the programme. According to the original proposal, three aspects were considered when making a decision about including applicant Chapters in the programme:

- The contribution of their mining sector to the national, and/or global relevance;
- An evaluation of the interest and capacity of the local TI chapter to contribute to the programme;
- The value-added, in terms of identifying good practice and key lessons learned about what works and what does not work in reducing corruption in the mining sector, of including a diverse range of countries with regards to regional and political context, legal and regulatory frameworks, the ‘home countries’ of mining companies operating in a country and current level and quality of multi-stakeholder engagement in the mining sector.\(^\text{15}\)

These criteria were not applied through a scoring system, but rather through informal discussions with the Chapters and among TI leadership, based on an internal assessment of the Chapters’ capacity and the relevance of their work to the programme. No detailed records were available.

\(^{15}\) Project application p.14
about the selection process within TI-S for this review. Therefore, it is not possible to evaluate to what extent the criteria were consistently applied in the selection of Chapters, and whether any additional requirements and recommendations were made to countries who were found to be lacking in any of the three aspects. Once again, a clear assessment of the Chapters, with specific attention to communications, advocacy and management capacity before embarking on Phase II would likely help TI in foreseeing and avoiding some of these challenges.

2.4. Sustainability

Financial sustainability

Funding for Phase II has not yet been secured and, at the time of writing the present report, the proposal for Phase II was being finalised. At the time of the review the programme team was working on reaching out to additional potential donors for Phase II, although no fundraising strategy was yet formalised at the time of writing this review. These could include bilateral and multilateral donors, and private foundations, as well as industry representatives. Given that the programme has been prominently profiled as an initiative supported by BHP Billiton Foundation, it is unlikely that other industry-related donors will find it an attractive opportunity, as joining a pre-existing initiative would limit their visibility as donors. However, the fact that the programme has global relevance, has established management structures, and is showing signs of positive outcomes makes it a strong candidate for obtaining additional funds from multilateral and bilateral donors. National Chapters have also been encouraged to raise their own additional funds, but no overview of their progress was available.

Finally, the relevance of the programme’s funding model in the wider strategic development of TI is still subject to discussion within the movement. In particular, this programme offers lessons to TI on managing large grants from the private sector with active involvement from the donor (through for example participation in the External Reference Group, attendance at events etc), whilst retaining TI’s independence and reputation. It appears that there are currently differing views within TI on this, and in view of the importance of private sector funding for future programmes of TI, it is important that the movement develops shared guidelines and policies for collaborating with the private sector while safeguarding the movement’s independence, transparency and public image.

Sustainability of outcomes

The programme has created sustainable outcomes at the organisational and structural level. The two-phased structure of the M4SD programme could act as a blueprint for future GTNIs, aiding the leading Chapters in conceptualising and framing the work. The programme has created research outputs and a research tool. These are resources that can be well used in the future for advocacy by
Chapters and in similar TI initiatives (e.g. the BICA programme). The research tool could be adapted to similar programmes in other extractive industries (i.e. oil and gas) with limited additional investment of resources, as the stakeholders and risk context for these industries is quite similar to that of the mining sector.

Interviewees agreed that the programmatic approach has strengthened the expertise and internal capacity of TI-A by allowing it to build up a team and further build its position as a center of expertise on transparency and accountability in mining. The role of TI-A in the programme is regarded highly by all internal stakeholders, and seen as sustainable for the future. The most important factor for ensuring the sustainability of the role of TI-A rests on the capacity and expertise of staff in the team, and in the ability of TI to secure funding for continuing the work. The Chapter ensures the sustainability of its role by strategically recruiting staff members with the appropriate expertise and through pursuing fundraising for the programme.

Interviewees from the Chapters felt that participating in the programme also strengthened the expertise and national networks of their organisations, especially where the skills and contacts of the research consultants were effectively shared with the permanent staff. Chapters have achieved some positive outcomes in building stakeholder engagement in their home countries. These relationships are theoretically independent of the programme itself and could serve to strengthen societal outcomes of other advocacy programmes in the future. However for this to be a realistic possibility, Chapters need to continue strengthening and curating their stakeholder relations.
3. CHAPTER 3 - IMPLEMENTATION COMPONENTS

3.1. Research

Despite the overall success of the programme, in which 18 out of 20 countries managed to produce national reports based on the corruption risk assessment findings by the deadline for inclusion in the global report, the research process has been challenging for some of them.

The MACRA tool

In the early stages of M4SD, almost all Chapter coordinators and National researchers were centrally trained to use the methodology: the training took place in-person and was delivered online to the Chapters which were unable to participate in-person. In one case, a Chapter’s representatives were unable to attend the training, and this resulted in problems during the research period leading to major delays that prevented the Chapter from delivering intermediate outputs in time. We conclude that the training was an important element for programme delivery contributing, in most cases, to a good understanding of the methodology and leading to the adaptation of the tool to the different local contexts.

According to the Programme Proposal, the MACRA tool is expected to be further refined based on the input of the 20 participating countries. Based on the Chapters’ feedback, the final product is expected to be used beyond the M4SD. According to the interviewees, Chapters applied the method consistently, while adapting the risks covered to the different country contexts. However, sometimes those differences have been substantial: the number of risks assessed in the participating countries ranges from 5 to 30, suggesting that the establishment of an indicative range could have been guiding them. The review found that the methodology could be re-adapted and used again in similar programmes concerning extractive industries, such as oil and gas. However, extensive review would be needed to apply the tool to other types of industries, as the challenges, risks and regulatory chains could differ considerably. However, the process outlined for the programme, of developing, training and managing the research process is still to be considered a valuable, although less tangible, output of the M4SD programme that could serve as a learning opportunity across TI, even in other industries.

Hiring of external researchers

The complexity of the research method and the specificity of the mining sector led most of the Chapters to hire external researchers. Some Chapters (such as Chile, South Africa, Zambia, and Guatemala) referred exclusively to existing in-house capacity. In some cases, the external
consultant hired for the research contributed to strengthening the Chapter, helping them to build their own understanding and expertise, or helping them to get in touch with relevant stakeholders who were more likely to start a conversation on the research topics. For other Chapters, however, the external researcher’s work did not build the Chapter’s capacity and was performed as a standard consultancy. Interviewees cited the lack of suitable researcher profiles and the limited timeframe of the collaboration between the Chapter and the researcher as reasons for this limited contribution to Chapter capacity through the research. As a result, some Chapters risked losing the knowledge and insights gathered by this researcher leaving the organisation at the end of the consultancy contract. While it cannot be expected that TI Chapter staff will have the necessary knowledge of the mining sector to carry out all research in-house, the Chapters should make sure that insights, network contacts and the most relevant knowledge of the sector can inform Phase II.

Some Chapters reported that they lacked the capacity to manage the work of the researchers to guarantee compliance with TI standards, and to monitor the quality of the content, deadlines and deliverables. In one case, the premature departure of the external researcher made the Chapter unable to deliver the National report on time. For Chapters involved in extractive industries related initiatives it has been relatively straightforward to find an external researcher who fit the profile requested by the programme, especially for the ones have been able to draw from a pool of well-known experts or could count on recommendations from peer organisations.

While it is too soon to detect a clear difference between the results of those Chapters which were more closely involved with the research performed by an external consultant and those which were less involved, it may yet appear that a dependence on external consultants to carry out cornerstone research carries some risks. Some Chapters felt that they learned from the expertise of the researcher, making the research in Phase I a learning opportunity for the Chapter itself. Those Chapters are likely to be more effective in Phase II, having built a solid internal knowledge base. For others, the end of the contractual agreement with the researcher coincided with difficulties in taking ownership of the results, or translated in an incapacity to substitute the sector-specific expertise. These risks need to be weighed against the opportunities brought by working with researchers whose expertise enables the Chapters to engage on a technical topic and whose professional networks can support the advocacy goals of the Chapters.

**Accessing data**

A good mix of secondary and primary data in assessing the risks for corruption in the process of allocating mining rights has been used for the production of the National reports. Chapters have, in some cases, been able to obtain information from governments regarding exploration licenses and could base their research on existing studies as well as published publicly available information. This
happened mostly in countries where the mining industry is still in an inception phase and is currently gathering more and more public attention. As for primary data collection, Chapters used mostly key informant interviews, roundtables and focus groups. One-on-one interviews have been the preferred way to obtain the information by the Chapters interviewed.

Advisory groups
Chapters have been encouraged to build an advisory group of experts to assist with the analysis of data. Some Chapters created such an Advisory group, others decided to engage with individual members separately, or when needed on the basis of their expertise.

Advisory groups have different configurations and roles across the implementing Chapters. In some cases, those groups were involved throughout the entire research period, helping the Chapters to identify key stakeholders, to review key research documents, to provide information on the legal framework and to help in narrowing down the scope of the research, as per the case of TI Cambodia. In other cases, for instance in TI Armenia, the group helped at a later stage, during the validation of results. The group composition also varied greatly: some countries managed to have a representational and balanced mix of advisors, including ministries of mines, industry associations and CSOs, while others involved more academics and representatives of stakeholders which are not directly involved in the mining industry (such as World Bank representatives). Based on data provided in the quarterly reports and in the interviews, most of the Chapters which created an Advisory group (8/20) had positive experiences in accessing data and in delivering on time.

3.2. Stakeholder engagement

The implementing Chapters agreed on the importance of bringing all the relevant actors together to discuss and to validate results. However, they recognised that for the engagement process to be effective and to create the level of participation required by the programme, more time would be needed. Engaging with stakeholders can require a considerable amount of time, and this is particularly true for those countries where there is less openness to discuss the matter and fewer pre-existing interactions between the different stakeholders. For the majority of the Chapters involved in the programme the tight timeline for the delivery in Phase I was a major constraint.

Once assembled, stakeholders have been engaged in different ways. The most common approach undertaken by the Chapters was to take contacts through a written request with a thorough explanation of the process followed by the request of a meeting. However, in a few cases, in-person meetings in the first place proved to be more effective in establishing contacts and clear processes for follow-up: this was the case for TI Sierra Leone, where one team member was responsible for
personal meetings and follow-up.

Chapter interviewees reported some difficulties in getting access to some stakeholder groups. Some countries (including several Chapters based in Africa) had more difficulty in engaging government representatives, while almost all Chapters had challenges in engaging with private companies. The reason for these difficulties was felt to be due to fraught relationships between governments and NGO communities; a reluctance to engage with NGOs traditionally perceived to have a critical position towards business and a reluctance to be associated with an anti-corruption process for fear of exposure. In this regard, the involvement of the External Reference Group members could help in establishing more contact with private companies. In addition, industry conferences and events provided a space in which Chapter representatives and other stakeholders could establish contacts with the private sector. In some countries, pre-existing relevant networks such as the EITI platform helped the identification of stakeholders and made the engagement process easier.

### 3.3. Communications

The communications function had an ancillary role until the completion of the country and global research reports, with a more important role foreseen for Phase II. However, for a programme of this size and scope, it is advisable to have a communications team in place from the inception of the activities.

Chapters were taking the lead on communications activities around their own activities, such as events and the promotion of the research outputs. The programme team includes a Communications coordinator in TI-A, as well as communication support at TI-S level. However, the team received only sporadic updates on communications activities from the Chapters, despite reaching out to the Chapters for more information on these activities on multiple occasions.

Some Chapters reported positive outcomes related to communications, such as managing to connect social media activities with stakeholder engagement, while others found communications activities more challenging. The success of the Chapters ultimately depended on their pre-existing communications expertise. TI-A struggled to understand what capacity was available in each of the Chapters, and conversely, what type of support or training would be needed for improving communications, based on the limited information provided by Chapters. The mixed success of these activities highlighted the need for an in-depth capacity assessment on communications and outreach before the implementation of Phase II.
3.4. Development of Action Plans

Based on the latest available information, 15 countries developed and submitted action plans, while three of them chose not to develop action plans and seek Phase II funding (Armenia, PNG and Colombia).

In general, action plans have been developed in a consultative way with the stakeholders and this has been perceived as really useful: most of the Chapters recognised the importance and the validity of the recommendations received in the action plans. The consultation process was also seen as an important way to continuously engage stakeholders in the process.

Some of the Chapters used the EITI platform to spread the document and collect feedback; validation has been also done through the organisation of workshops with the stakeholders and has built on the validation of the identified priority risks. The Global Workshop conducted in July 2017 helped the Chapters in the development of action plans, showing once again the importance of in-person meetings and of sharing experiences.

Some Chapters agreed that the timeline to prepare the action plan was the main challenge to the on-time delivery of the plan.

3.5. Programme Support to Chapters

General Support
TI-A used e-mails, group and individual Skype calls, site visits, guidelines, research capacity building workshops and group messaging (Whatsapp) to connect with Chapters.

Role of regional advisors
According to the original proposal, regional advisors at TI-I should facilitate access and availability of information from Chapters to TI-A, support the general communication with them and provide information on the Chapters’ ability to deliver and to produce high quality research. During the delivery of Phase I, regional advisors were involved in addressing challenges in implementation as they arose. While this was felt to address the needs of Phase I adequately, in Phase II closer cooperation between the team and regional advisors could support implementation by highlighting synergies with other activities in the regions, and linking up networks.

Workshop & meetings
Workshops and meetings, as well as individual support through visits and phone calls to Chapters, were felt to work most efficiently for transmitting information and coordinating delivery, both
according to Chapters and team members. Chapters appreciated the opportunity to discuss their individual situation with programme staff, and several interviewees highlighted the unusually quick responsiveness of the Chapter Coordinator and the Research Coordinator. Researchers and national Chapter staff found the workshops instrumental in learning to use the tool, but also for sharing experiences and finding solutions to shared challenges.

**Online platform & remote communication**

Unfortunately, remote and web-based support have proven less effective. Programme staff have expressed frustration that written guidelines for practical issues were only followed when individual conversations repeated or emphasised their content. A Whatsapp group has been used as a main shared venue for communication although it did not succeed in creating a vibrant discussion platform among Chapters in the time between in-person meetings. The online internal platform established to share documents (Office 365 Sharepoint) has not been largely used. E-mails remained the most preferred way of communicating. While the Chapters valued meeting and sharing with their peers, no communication network among them emerged during Phase I. Unfortunately this meant that while Chapters valued the possibility of learning from each other, only in a few instances have interviewees reported sharing resources and contacts with Chapters working in similar political contexts.

Based on this experience, Phase II may benefit from dedicating additional resources to individual follow-up and support with Chapters, in-person meetings and sharing experiences. In the longer term, a culture shift within TI could lead to more intensive and effective use of virtual discussion platforms but for the immediate future it would be likely unrealistic for Chapters to radically increase their appetite for working with these remote channels.
4. CHAPTER 4 - RECOMMENDATIONS

4.1. Conclusions

The programme’s activities and outputs were well chosen and relevant. The research conducted in Phase I created a baseline study that did not exist before, the capacity of TI-A and the Chapters has increased and Chapters have achieved some positive outcomes in engaging stakeholders in their home countries. The two-phased structure of the M4SD programme helped Chapters frame their work and could act as a blueprint for future GTNIs.

Through the process, most of the involved TI Chapters built their understanding and expertise on the award of mining licenses. This has been achieved thanks to a good level of support from TI-A and TI-S and thanks to the flexibility of the research method, which left room for adaptability to the local contexts. However, the fact that an in-depth capacity assessment of the participating Chapters has not been conducted, made the operations sometimes challenging and considerable effort has been dedicated to the mitigation of the resulting delays and inefficiencies. The evaluators suggest that in multi-country programmes such as M4SD, the capacity assessment of the Chapters is a process that needs to be institutionalised at TI level.

Despite the GTNI’s concept being centered in the independence of the implementing Chapter, for a variety of practical and legal reasons, TI-S had a substantial role in the management of the work. The lack of clarity in the division of roles (among other factors) created tensions between the TI-S and TI-A teams. Furthermore, the other Chapters in the programme played a minimal role in the strategy or design of the programme.

Going forward, the good results from the first phase will need to be turned into actual impact towards positive change in creating an enabling environment and improved policies and practices related to mining licenses and awards. This will require continued commitment from TI-S, TI-A, the Chapters and the two Boards. Only then, the good results from the first phase can lead to the desired change.
### 4.2. Programmatic Recommendations

<table>
<thead>
<tr>
<th>Recommendations</th>
<th>Time in</th>
<th>Responsible actor</th>
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<tbody>
<tr>
<td>Make sure that the agreed programme objectives are referred to in planning and guiding discussions about impact and advocacy in order to ground the programme. This will be important in the planning of advocacy in Phase II.</td>
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<td>With the new TI Board starting work, ensure that there is Board support for continuing work in Phase II and agree on framing the work with the Board and donor.</td>
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<tr>
<td><strong>Relevance</strong></td>
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<td>TI Board (at movement level) to clarify approach for working with the private sector while maintaining a solid reputation, independence, transparency and accountability.</td>
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<td>Assess the continued relevance of the three different sets of objectives and agree on one set of objectives going forward. An update of the needs assessment and/or revisiting the ToC.</td>
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<td><strong>Efficiency</strong></td>
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<tr>
<td>One-on-one support to Chapters was very useful, but for Phase II it will mean significant additional workload. We recommend hiring an assistant/additional Coordinator for the team.</td>
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<td>Given the high turnover, it is crucial that organisational structures are in place for an effective handover in TI-S and TI-A. Ideally when recruiting new staff members, there should be an accompaniment period.</td>
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<td>Develop a more tailored grants structure for Phase II: local purchasing power, cost of hiring staff, number of outreach missions foreseen in the planning and banking costs should all be taken into consideration while establishing a fair amount for funding to be allocated to Chapters.</td>
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<td><strong>TI-S &amp; TI-A Relations</strong></td>
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| Develop a clear process for communicating with each other and with Chapters. These should cover:  
  - Publications & Press releases  
  - Reporting  
  - Management decisions  
  - Outreach on behalf of the programme  
  - Donor relations  
  - Any other that the teams may consider useful.  
  The process should indicate when the other teams need to be informed (e.g. CC’d on email) and when they have sign-off or decision-making power. In everyday communications, emails should indicate clearly what type of contribution is sought from the other team (sign-off or information). In some of the processes where delays are frequent, it should be agreed that TI-A or the coordinator within TI-S is responsible for following up with the relevant TI-S team (e.g. Legal or Communications) on behalf of the programme. |         |                  |
| **MEL** |         |                  |
| Assess Monitoring and Evaluation capacity in the Chapters and streamline capacity building where needed with movement-wide capacity-building initiatives. |         |                  |
| Set aside structured time for reflection and learning in the programme team (TI-A and TI-S) and with the Chapters. Capture insights from the reflection in actionable points for what is relevant for Phase II but also for the other GTNIs. |         |                  |
### 4.3. Implementation components Recommendations

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<th>Recommendations</th>
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<th>Responsib e actor</th>
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<tr>
<td><strong>Research</strong></td>
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<td>Carry out a thorough capacity assessment of the Chapters taking part in the programme. This assessment should cover the internal management capacity of the Chapter to manage additional human resources and the country context, the availability of pre-existing networks of experts, but also communications, research and financial expertise.</td>
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<td>Continue to foster peer exchange across Chapters through cross regional meetings.</td>
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<td>Chapters should make sure that there are opportunities for the external researchers to transmit their insights, most important parts of the knowledge acquired through the process and the network contacts built up through the process, to the Chapter before the end of their contracts. This could happen through internal conversations and capacity building, and the involvement of Chapter staff in some parts of the research. This recommendation will be relevant for those Chapters that plan on implementing research activities or hire external consultants for advocacy in Phase II.</td>
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<td><strong>Stakeholder Engagement</strong></td>
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<td>To help the Chapters in getting in touch with private companies, build on the power of TI as an international organisation as well as using contacts in the External Reference Group to reach private mining companies. At the same time, a provision for more in-person meetings organised alongside major conferences and events.</td>
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<td><strong>Advocacy</strong></td>
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<td>Conduct an in-depth capacity assessment of the Chapters' ability to manage advocacy initiatives, including communication and project management aspects.</td>
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<td>Programme Coordinator</td>
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<td>Regional Coordinator, West Africa</td>
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<td>Coordinator - Global Thematic Initiatives</td>
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<td>Research &amp; Policy Coordinator</td>
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<td>Advocacy and Communications Coordinator</td>
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<td>Member of the Board’s Mining Committee</td>
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<td>Chapter coordinator, Mongolia</td>
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<td>Chapter coordinator, Proetica (Peru)</td>
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<td>Chapter coordinator, Cambodia</td>
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<td>Coordinator/researcher, Chile</td>
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<td>Chapter coordinator, Liberia</td>
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<td>Chapter coordinator, Sierra Leone</td>
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<td>Chapter coordinator, Mozambique</td>
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<td><strong>External Reference Group</strong></td>
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<td>Manager, ICMM</td>
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<td>Commonwealth Secretariat</td>
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<td>BHP Billiton Foundation</td>
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</tbody>
</table>
ANNEX II - LIST OF DOCUMENTS REVIEWED

Programme documents
1. Transparency International_M4SD_PhaseII_BHPBF Concept Note FINAL
2. TI_M4SD_summary_Phase1
3. NC sub-grant agreements_final draft
4. Annex I_Description of the Programme
5. Grant Agreement TI-S_Ti-A
6. Annex IV
7. Principles of Cooperation_June 2016
8. GTN Guidelines_December 2016_final (1)
9. Mining contribution index ICMM 2016

Job Descriptions
11. Job description_TIA Finance and Admin Coordinator_February 2017
12. Job description_Programme Manager_M4SD Programme
13. Job description_Research & Policy coordinator_M4SD Programme
14. Mining for Sustainable Development Advocacy and Communication Coordinator TI Australia
15. Mining for Sustainable Development_Country-Project Coordinator_FINAL (1)
16. Programme roles V02 AS 110117

Q3 financial reports
17. 19092017 Armenia Mining Q3 2017_FGB
18. 19092017 Armenia Mining Q3 2017_FGB.xlsx
19. 19092017 Canada Mining Q3 2017_FGB
20. 19092017 Chile Mining Q3 2017_FGB
21. 19092017 DRC Mining Workbook_FGB
22. 19092017 Zambia Mining Q3 2017_FGB
23. 20092017 PNG Mining Q3 2017_FGB
24. 22092017 Sierra Leone Q3 2017_FGB
25. 25092017 Guatemala Mining Q3 FGB
26. 25092017 Peru Mining Q3 2017_FGB
27. 25092017 Zimbabwe Mining Q3_FGB

Chapter narrative reports
28. 2016 Q3 (17 reports)
29. 2016 Q4 (21 reports)
30. 2017 Q1 (19 reports)
31. 2017 Q2 (17 reports)

MEL documents
32. MEL Plan V9
33. Summary theory of change V05 300317

Research documents
34. MACRA tool ENG - 7 Oct
Stakeholder analysis
35. 1. Report on Country Level Stakeholder Mapping
36. 2. Overview Chapter Stakeholder Analysis & Engagement Plans
37. Armenia
38. Australia
39. Cambodia
40. Canada
41. Chile
42. Colombia
43. DRC
44. Guatemala narrative analysis
45. Guatemala analysis tables
46. Indonesia
47. Kenya
48. Liberia
49. Mongolia
50. Mozambique
51. Niger
52. Peru, English stakeholder mapping
53. Peru, Spanish stakeholder mapping
54. Sierra Leone
55. South Africa
56. Zambia
57. Zimbabwe
58. Zimbabwe (revised)

Reports and materials from global workshops
59. MiSD Notes from Global Workshop_Malaysia 25-28th July_Internal document
60. MEL plan presentation
61. Worksheets from workshop
62. Intro to the Programme_Day 1_DB
63. Mining tool steps_AMD_LC
64. Report on training workshop 021116

Reports from regional workshops
65. Accra_Workshop Agenda and Notes_180217
66. Bogota_Apuntes Taller Regional_16032016
67. Cape Town_Regional Workshop Notes_15032017
68. Jakarta_Regional Workshop Notes_15032017
69. Intro to the Programme_Day 1_DB

ANNEX III - WORKING PROCESSES

[In a separate document]
Annex III - Working processes

In addition to the discussion on efficiency and the collaboration on the programme in the body of the report, this annex takes a closer look at some of the specific working processes. This annex looks specifically at how M4SD has benefitted from being a GTNI, how it has overcome any challenges and what could be done to further streamline collaboration. Through additional targeted interviews with members of the team in TI-S and TI-A, the review team and the programme team identified three specific workstreams that were found to be in need of improvement: **Research and reporting**, **Financial reporting** and **Production of Communications outputs**. In addition, we summarised the findings from the first round of interviews, the targeted interviews and the desk research, in four aspects of the collaboration: **design of the collaboration**, **practical issues in long-distance collaboration**, **interpretations of the programme objectives** and **people and individual working relationships**.

The analysis and recommendations included in this annex are based on the views and experiences of the interviewed team members, and on the independent assessment of the evaluators.

**Introduction**

As a part of TI’s Global Thematic Network Initiatives (GTNI), M4SD has explicitly designed as a collaborative programme within the TI movement. The expertise and qualities available in the network, should be used when working on globally transversal issues, which is why TIA is leading a coalition of Chapters to work on mining licensing and approvals. This ambition of creating thematic sub-networks in the movement, also brings with it certain challenges of networked ways of working.

Most importantly, the division of tasks between TI-S as the receiver of funds and guardian of the TI brand, TI-A as leader Chapter of M4SD and the participating Chapters, needs to be designed intelligently. Collaborating over great distances, with large time-differences and in very different contexts, also poses significant challenges. A lack of clarity about the way in which the current organisational structure would function in the day-to-day running of the programme have also resulted in slightly different interpretations of the programme objectives and the division of tasks. ¹Finally, personnel changes and strained working relationships have further complicated the programme implementation.

¹For an overview of roles in the two offices please refer to the Introduction chapter of the main report.
Work processes

The review team conducted an additional set of interviews with 8 team members. These interviews focused on the team member’s experience with work processes and asked them to identify processes that they felt resulted in inefficiencies or friction within the team. In the interviews, three areas were identified where lessons should be learned for the second phase of the programme: Research and reporting, Financial reporting and Production of communication outputs. These are briefly discussed below, with a visualisation of the process, the issues identified by the interviewees, and recommendations to remedy those, based on insight from the team and from the analysis of the evaluators. There are also transversal issues related to the general collaboration, which are discussed under ‘Issues in collaboration’ below.

Research and research reports

At the beginning of the programme, a process was implemented by the team to ensure the quality of the research and the reports in line with TI standards. The process has not been formally designed or agreed upon by the team, but was based on the job descriptions and organisational practice. The process, visualised in figure 1 below, was in fact not a process to conduct the research but the quality control afterwards. Through it, country reports were submitted to TI-A, who produced a Global report, which then went to two several rounds of quality assurance, first by programme staff and invited external reviewers at TI-S, then by the TI-S Editorial committee, subsequently back to the TI-A research coordinator and after a final proofread at TI-S, the final report was produced. The process thus focused mostly on how the global report was reviewed and agreed between TI-A and TI-S, adhering to general editorial and research standards at TI.

Figure 1: Research reports
Issues identified

The process related to the global report was indicated by several team members to lack sufficient clarity on the respective responsibilities of the involved actors. The following sticking points were identified:

- Length of the review process;
- Lack of clarity about the purpose and intended use and tone of the report;
- Steps and actors involved in the review
  - There were several rounds of informal review on drafts of the global report;
  - The TI-A team did not have prior information on who in TI-S would comment on the report;
  - In these review rounds, it was unclear to what extent the suggestions were to be taken into account, i.e. whether the TI-A team was expected to take all comments into account or whether comments were made as suggestions;
  - Some team members felt that the tone of the comments was not collegial enough and did not appear to recognise the expertise of the TI-A team.
- The draft report was reviewed by an Editorial committee comprising TI staff and external experts, as per TI’s usual practice.
  - Prior to the process, it was unclear to the TI-A team what the composition of the committee would be;
  - The comments of the committee were consolidated in one document, but not ranked by order of importance, therefore again leading to lack of clarity on the extent to which they needed to be addressed.

Overall, the lines were blurred between formal and informal reviews, suggestions and comments on the one and edits on the other hand. This had to do with the fact that for TI-A, the process at TI-S was a black box of which they only saw the outcome. The focus on editorial control rather than on research support, thus made the process bureaucratic and restrictive rather than collaborative and supportive. All interviewees agreed on the high quality of the final product. Therefore, the focus of the recommendations is on the experience of the team members involved in drafting the report and addressing comments; and in increasing the efficiency of resources used for review for a smoother process in the coming reporting phases.

Recommendations

- Make sure that the tone of communications is respectful and collegial, and acknowledges the ownership of the report in the lead organisation;
Discussions on the global approach and purpose of reports should take place early in the process, preferably before drafting of the country reports begins. At that time, the process of producing the country and global reports can be discussed, and support can be offered by experts, TI-A orTI-S if relevant. This is likely to save time later in the process as the quality of the country research reports will be higher.

In internal informal review rounds, agree on the nature of the comments. We would propose to in principle treat them as suggestions whose inclusion is at the discretion of the team member leading the drafting process. In case of serious concerns about the content of the report or methodology, these should be flagged specifically and discussed separately as needed. Collaboration could benefit from in-person (or phone) discussion of comments rather than just the exchange of annotated drafts.

Comments from the editorial committee should be prioritised by the severity of the need to address them for the report to pass the review. E.g Key changes to make; Optional changes to make; Suggestions; Questions raised.
Financial reporting

Separate from the management of the programme and of the research component, internal financial reporting lines were agreed between the participating Chapters, TI-S and TI-A. It was envisioned that all financial reporting by Chapters would be done to TI-A, who would then submit consolidated reports to TI-S. As the contracting entity with one of the main donors (BHPB), TI-S would be responsible for reporting to the donor. The workflow is complicated by the fact that the work of some of the Chapters is funded from the grant from DTFA which means that they had to hold contracts with TI-A, while the rest holds contracts with TI-S, while the contracts with both donors are held by TI-S. These restrictions are due to legal and organisational factors which are not up for review during Phase II of the programme. Figure 2 below, outlines this process as it was designed but also the process as it was actually implemented, namely one in which TI Chapters funded through the BHP grant, reported to both TI-A (as agreed) and to TI-S.

Figure 2: Financial reporting

Issues identified

The main inefficiency identified in this process was that the chapters funded from the BHP Billiton Grant often communicated both with TI-A and TI-S on financial reporting. The reason for this may have been that TI-S followed up directly with Chapters on some issues, and it may have been unclear to Chapters on which questions to contact TI-A and on which TI-S was the relevant contact. At the same time, due to capacity issues in TI-A, TI-S felt the need to take the
lead on some financial reporting issues as contract holder towards the donor. As many of the interactions between the Chapters and TI-S did not include TI-A however, information was sometimes lost and double communications resulted. This was cause for frustration and led to the perception at TI-A that TI-S was attempting to control the financial reporting, even though this was at most only one part of the reason for the confusion.

The financial reporting is a function of the division of tasks in programme management and in a multi-country programme with many existing links between the various actors, therefore our suggestions concern these issues rather than the process itself.

Recommendations

- The communications lines should be clarified. We suggest that in principle TI-A be responsible for all financial reporting and their submission to TI-S. Where for pragmatic reasons clarifications need to be made by the Chapters directly with TI-S, it should be agreed that TI-A Finance coordinator be copied in all such communications.
- TI-A and TI-S have already discussed the possibility of TI-A holding all contracts with Chapters from Phase II onwards. This would serve to clarify the division of tasks internally.
- In addition to ex-post control on financial reporting, periodical update calls between the finance coordinators of TI-A and TI-A should be held to ensure that any future confusion or tension, will be identified at an early stage to be dealt with accordingly.

Production of communications outputs

To protect the TI brand and ensure coherence in external communications, TI implements a standard procedure for outputs involving Chapters, TI-A and TI-S. As in the research reporting process, this focuses mostly on checking outputs by Chapters and TI-A rather than ensuring the production and content are done according to best practices. The process asks Chapters and TI-A programme staff to submit drafts to the TI-A Communications Coordinator, who then checks and forwards this output to the TI-S programme coordinator who then liaises with the Communications coordinator in the TI Secretariat.
Issues identified

In the case of communications products, the main sticking points were related to the finalisation process between TI-A and TI-S. The strategy and effectiveness of communications outputs, were in this process of secondary concern to the adherence to formal requirements and lack of exposure to litigation or other forms of reputational damage. Specifically, the following issues were identified:

- According to the proposal and the budget, a Communications Coordinator (20% FTE) is supporting the work in TI-S. However, the roles and responsibilities of this position in relation to the TI-A Communications coordinator have not been clarified.
- Communications between the two Coordinators (in TI-A and in the communications team at TI-S) does not take place directly. Instead, the TI-S Programme coordinator acts as intermediary between the TI-A Communications coordinator and the TI-S Communications team. The reason for this additional involvement was to be able to follow up on delays in the TI-S Communications services, which were due to low capacity. This, together with the lack of capacity in the TI-S Communications team resulting from the restructuring and redundancy processes has often resulted in turnaround times which are longer than necessary.

Recommendations

- Clarify the role of the Communications coordinator in TI-S, including the type of support that they can provide, the binding nature of comments made (whether they are for approval or suggestions), and the turnaround time on requests from TI-A.
Establish direct communications lines between the TI-A and TI-S Communications coordinators.

TI-S should consider increasing capacity in the TI-S Communications team in line with the specifically budgeted roles in long-term projects.

There is tension between strategic processes aiming at decentralisation and those leaving ultimate control and responsibility over quality of outputs with a reduced TI-S team. This tension should be acknowledged at the team level and addressed at the strategic planning level.

Issues in collaboration

Design of the collaboration

Due to the nature of the programme but also because of TI-S holding the contract with the donors, there were several instances in which TI-S and TI-A team members felt to have conflicting or overlapping roles. On paper, reporting lines were agreed but interviewees mentioned many instances of misunderstandings or conflicting messages. These misunderstandings can stem from an organisational structure that focuses on control over collaboration and chains of responsibility rather than facilitation of contact. This is an issue which exists in many other global networks and often surfaces in programmes run by international teams in INGOs. It would be useful to see whether the culture of can be modernised in the organisation (and the sector) as a whole but in case the internal requirements are non-negotiable in the short term, the team should consider mitigation strategies for the second phase of the M4SD programme.

Recommendations

Where the teams agree on a supervisory/approval function of TI-S, bring the control function of TI-S forward whenever possible by including more advice and support to Chapters and TI-A, at an earlier stage in each work process. This will reduce the time investment at final stages of work processes and allows the two teams to collaborate based on shared understanding of the state of progress.

In the work plan of Phase II build in standard moments to discuss collaboration in general, and the highlighted work processes in particular, between TI-S, TI-A and, where relevant, a selection of Chapters. These discussions should be open and any issues would need to be approached with a solution-oriented mindset, meaning that despite existing requirements, the processes can always be adapted, or added to, to accommodate concerns.
The team might benefit from a moderated work session on agreeing on the steps in each work process where TI-S and TI-A share responsibilities.

**Long-distance collaboration**

The practical challenges of working over long distances, with culturally diverse people and organisations working in very different contexts, are difficult to overcome. This is not an issue exclusive to the M4SD programme or TI. However, there are still ways to forge a closer working relationship over long distances through technology, frequent default update calls rather than emails only, at least some in-person meetings and a rotation system for the times calls are held to account for time differences. In Phase II of the programme, this issue should be addressed at the outset.

**Recommendations**

- Increase personal contact between programme staff by:
  - Ensuring everyone in the programme team has met physically;
  - Organising default bilateral calls periodically (frequency depending on the role) between peers in TI-S, TI-A and where relevant, the Chapters;
  - Consider other forms of communication such as a webinar, a photo blog or a social video conference to interact without a clear content agenda.

- Increase effective online collaboration by using existing technology in a better way, a new tool and/or social media, to facilitate continuous online discussions per topic or work area. Co-drafting, informal communications and collective decision-making should be brought together to increase the volume on such a platform and thereby the likelihood of people actually using it.

**Individual working relationships**

Due to a number of personnel changes, combined with the challenges mentioned above and strained personal working relationships, the collaboration and team spirit were often not optimal in Phase I. The evaluators have noticed this in the interviews through some expressions of frustrations but also in differences in opinion which were expressed as personal conflicts. These strained relationships were both a cause and caused by, the other challenges making them more difficult to resolve. Without going into the details of the issue as it currently stands, going forward it is crucial to learn the lessons from this situation. Solving some of the practical problems and aligning on the objectives, will already do a lot to rebuild trust as well.

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2 In addition to Yammer or Facebook, other tools exist which are easy to implement and use and might offer more flexibility. These include https://www.loomio.org/ or https://www.humhub.org/en but there are many more.
Recommendations

- The most important might be that the staff recruited for these types of programmes, need to be not only experts on content but need to be able to work in a very networked way. Therefore communicative qualities, cultural sensitivity and willingness to work with people and organisations with widely different capacities, should be an explicit part of the recruitment process.

- Programme coordinators need to take coordinated action if anyone in either team is not functioning properly. If the issue is with the counterpart, an escalation mechanism to either the steering committee or a line manager in either organisation, needs to be followed quickly to mitigate any possible negative effects on the programme.
CASE STUDY Mongolia

Introduction

This case study is an annex to the TI Mid-term Process Evaluation of Mining for Sustainable Development Programme, and it is part of a series examining how national Chapters experienced a diverse set of successes and challenges due to the broad range of cultural and economic contexts in which they operate: case studies focus on Cambodia, Mongolia and Peru.

The case study aims to answer three questions: 1) How was the programme implemented? 2) Which factors enabled successful delivery? 3) Did the Chapter experience any challenges in the implementation? The case study draws on desk research, including the review of quarterly reports from the Chapter, and one key informant interview with the Chapter Coordinator.

Context

Corruption is a serious concern in Mongolia. The country ranks 87/176 countries in Transparency International’s Corruption Perception index, with a score of 38/100.\(^1\)

Mining is a crucial and fast-growing sector in Mongolia, contributing to approximately 20% of the GDP and 80% of export revenues, and 70 per cent of foreign direct investment into the country.\(^2\) Together with the high risk of corruption, the high value of the mineral assets means that the mining sector is highly vulnerable to corruption.\(^3\) In recent years the legal framework on mining has been evolving dynamically. In addition to the 2014 Minerals Law and 2014 long-term minerals strategy of the government, a Model Agreement on Issues of Environmental Protection, Mine Exploitation, and Infrastructure Development in Relation to Mine Site Development and Jobs Creation was adopted in 2016. This agreement, which was based also on consultations with civil society, outlines the basis for an agreement to regulate the relationship between a mining license holder and local government, among others.\(^4\) These developments show a regulatory framework in evolution, which in turn may offer occasions for engaging decision makers on corruption in mining licensing approvals, and thus increase the relevance of the M4SD programme for the country. The work was particularly relevant

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1 Transparency International (2016) Corruption Perceptions Index
4 For a full summary of the legal framework in Mongolia see IGF (2017) p.7.
as no other stakeholders active in mining-related advocacy in Mongolia focus specifically on increasing transparency in licensing.

Overview of implementation

TI Mongolia was, together with Armenia, one of the countries where the M4SD concept and the MACRA tool were piloted. Therefore, the Chapter was familiar with the structure and the content of the programme before Phase I started. Engagement with stakeholders however did not make part of the pilot, and only started once the programme implementation commenced. The team included the coordinator, 2 researchers and the part-time capacity of a volunteer funded by GiZ from mid-2016 until August 2017, who assisted the management of the programme.

The programme met the milestones and deadlines set for implementation. However, some adjustments were made to the original programme planning, made necessary by delays in the recruiting of researchers, which in turn resulted in delays in stakeholder engagement. The original plan foresaw site visits to mining sites. These did not take place, due to a lack of capacity in the Chapter. Instead of the field visits, additional meetings with NGOs were organised to ensure engagement with a wide range of stakeholders. However, some types of stakeholders, in particular host communities may not have been engaged as a result of this change.

Support from the TI-A and TI-S teams was used by the Chapter on various aspects of implementation. The Coordinator felt that input from the TI-A coordinator was particularly useful in informing the job descriptions and division of tasks of the two researchers recruited to share the research responsibilities. Due to the delay in recruitment, the Chapter could not yet send researchers to attend the first workshop of the programme in Berlin. Support from TI-A through a series of one-on-one Skype calls was key in enabling the researchers, once recruited, to acquire the insights shared at the workshop and build their capacity in using the research tools.

Successes and enablers

- TI Mongolia could build on previous experience and a network related to the mining sector. The Chapter is part of the Open Government Partnership and was able to leverage its well established relations with the Publish What You Pay Coalition, EITI and the Open Society Forum in Mongolia. Before the start of the programme, TI Mongolia had also worked closely with the Integrated Mineral Resource Initiative (IMRI) of the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), which helped it build up its network and expertise in the mining sector. These contacts supported TI Mongolia in accessing government and industry stakeholders and in disseminating research results within the country's
international community by being open to one-on-one meetings to discuss the work and findings. Wider public events are planned for Phase II.

- The stakeholder mapping identified private sector, government and NGO stakeholders. Engagement of these groups met different challenges. The Chapter Coordinator felt that some companies in the mining industry had a positive attitude towards participating in the programme. This positive engagement was enabled by framing the increase in transparency as a useful means of attracting investment. Among companies, Procon Mining and Oyu Tolgoi and the Mongolian National Mining Association attended stakeholder meetings, and several individuals were willing to participate to interviews. Government stakeholders however were more reluctant to collaborate with the initiative during Phase I for interviews and workshops. The Chapter found that it was easier to engage these stakeholders, e.g. the Ministry of Mining, once tangible research outputs could be used as a discussion guide, for instance by inviting comments on the draft report. This approach was particularly successful in creating a dialogue with the Ministry of Mining, where the Ministry expressed an interest in collaborating with TI on 4 out of 5 risks identified in the risk assessment. The Chapter is currently developing a bilateral Memorandum of Understanding for cooperation with the Ministry as a result of the conversations around the M4SD report. If the MoU guiding collaboration is finalised, TI Mongolia could increase its influence in advocating around upcoming legislative processes even in the context of an unstable government where the personal contacts in the Ministry could change frequently.

**Challenges**

- The recruitment and management of researchers has resulted in some challenges for the Chapter. The Chapter decided to hire two researchers to share the work, as one of the had extensive local mining expertise and the other significant methodological skills, who acted as lead researcher. Although the roles and responsibilities were clarified at the beginning of their joint work, the two researchers followed different approaches, which led to the lack of sufficient exchange, resulting in delays. After a discussion involving both researchers and the coordinator, it was agreed to terminate the contract with the supporting researcher. The supporting researcher (whose contract was terminated) was considered for the peer review role but the Chapter decided against this. This process also illustrates the challenges that TI Chapters may encounter in implementing Phase II and in managing future projects which rely on external consultants for substantial parts of the content work.

- In the risk scoring workshops, most of the attendees represented associations such as the EITI or Publish What You Pay, independent experts, industry representatives or individual NGOs; and few represented the government sector. Attendance at the workshops
was also relatively low, with 5-8 individuals participating to each of the 3 events. The facilitator aimed to balance this out by making sure that each type of stakeholder had sufficient time to intervene, but the outcome of the scoring exercises may still be affected by the under-representation of the public sector in the debates. This was also a challenge in the validation workshops. The Chapter has applied for additional funding for Phase II with the Canadian Government linking the M4SD and the Business Integrity Country Agenda (BICA) Assessment. However the evaluation of this proposal was halted. The Chapter organised in-person meetings to present the translated report (Mongolian and English) to establish relationships with additional potential donors in the international donor community in Ulaanbaatar. These included the Austrian Development Agency, the Asia Foundation, as well as the Canadian and Australian governments.

Lessons Learned

- The Chapter already benefited from its pre-existing networks for identifying and approaching stakeholders. However, instead of large launch events, most of the discussions about the programme took place in one-on-one meetings. In the future, TI Mongolia should use these connections to disseminate the research and increase the visibility of the work through the stakeholder networks of its national and international. Other Chapters implementing Phase II may also encounter the need to balance one-on-one meetings with wider public events for advocacy and outreach.

- Engaging with the public sector may remain a challenge for future projects as well. Developing memoranda of understanding with individual agencies may help solidify the collaborative relationship in an environment where personal contacts may change frequently. This tool may be of interest to other Chapters encountering challenges in engaging the public sector. In the case of TI Mongolia, the Chapter managed to increase government engagement once the research product was drafted. In addition, in the future and for the wider TI movement, it would be interesting to exchange experiences on how different Chapters addressed imbalances in the representation of stakeholders and ensured input from all relevant groups.

- In managing the programme, the Chapter Coordinator met challenges in recruiting and managing the two researchers. In this case, ad hoc support from TI Australia was instrumental in overcoming some of the gaps in research capacity that stemmed from the researchers not being able to attend the first workshop. For future initiatives that involve consultants, as well as for Phase II, it will be important to assess and if necessary, strengthen the management capacity of Coordinators.

- The toolkit and guidance were adapted by the researcher to the Mongolian context and the
timeline of the programme to allow for meeting the deadlines: desk research was conducted simultaneously on all stages of the licensing process, and the PEST analysis was replaced by an analysis of issue areas around the licensing process. This flexibility was useful in adapting the structure of delivery to the reality of the country. However, increased management and planning capacity in the Chapter may help in lessening the need for adaptations during the delivery of Phase II.

- TI Mongolia struggled finding good quality support, for instance when it comes to peer review, translation, and editing. In the future, the Chapter can rely on the individuals identified for Phase I. The challenge illustrates the need for advance planning of support resources for publications in future projects and in Phase II, where increased communications and publications support may be required to support outreach.

- Having experience with other tools used by TI, such as the BICA assessment tool or the anti-corruption agency strengthening tool enabled the Coordinator to oversee and manage the process more easily. The Chapter also foresees that experience with stakeholder engagement in M4SD will be useful in the multi-stakeholder work for BICA. This is a strategic opportunity for TI Chapters working with both tools, who could benefit from exchanging experiences and insights on how to best leverage stakeholder networks across projects.
CASE STUDY CAMBODIA

Introduction
This case study is an annex to the TI Mid-term Process Evaluation of Mining for Sustainable Development Programme, and it is part of a series examining how national Chapters experienced a diverse set of successes and challenges due to the broad range of cultural and economic contexts in which they operate: case studies focus on Cambodia, Mongolia and Peru.

The case study aims to answer three questions: 1) How was the programme implemented? 2) Which factors enabled successful delivery? 3) Did the Chapter experience any challenges in the implementation? The case study draws on desk research, including the review of quarterly reports from the Chapter, and one key informant interview with the Chapter Coordinator of M4SD in TI Cambodia.

Context
The mining sector in Cambodia is less developed than in many other M4SD programme countries, and active mining enterprises are typically small-scale, mainly producing materials for construction. There is no industrial-scale extraction of minerals yet, although a number of exploration licenses have been granted to foreign mining companies, some of which have reported promising finds of gold. 1

Although the current regulatory framework has been improved in recent years, Cambodia still faces a number of challenges in natural resources management, environmental sustainability, and good governance. 2 The country ranks 156/176 in Transparency International’s Corruption Perception index. 3

The Cambodian Government established a national multi-stakeholder initiative, the Extractive Industry Governance Forum, in which industry, government and CSOs representatives come together to promote transparency and accountability in the mining sector.

Overview of implementation
TI-Cambodia built on existing human and financial resources to manage the M4SD programme. The team included a Chapter Coordinator (involved in other programmes at the same time), an External Researcher, a Programme Manager also responsible for EITI engagement on behalf of the Chapter,

1 https://opendevelopmentcambodia.net/topics/mining/
3 Transparency International (2016) Corruption Perceptions Index
and the Operations Director managing administrative tasks linked to implementation. The grant received from M4SD has been sufficient to cover the assessment itself and the hiring of the researcher: however, in order to guarantee a better oversight and programme management, general operational charges have been also taken from the Chapter’s core funding.

TI-Cambodia has been supported by TI-A and TI-S, and benefited particularly from support by TI-A in providing insights regarding the adaptation of the tool to the Cambodian context. In addition, the learning from other Chapters and from the regional workshops organised at the beginning and final stage of the process have been felt useful by TI-Cambodia to share challenges, lessons learned and coordination aspects with others participating Chapters.

The focus on mining exploration licenses is felt to be highly relevant given the on-development status of the mining sector in Cambodia. The industry itself is not a major source of profit for the national economy, but the potential of the mining sector has been recognised by the Government and the general public. Phase II of the programme will enable TI Cambodia to advocate around this emerging topic.

Successes and enablers

The interest of the Cambodian government in improving transparency and governance of the mineral sector, and its willingness to investigate and monitor mining operations have been pivotal to success in a number of ways:

- The creation of a national platform bringing together different stakeholders ensured substantial engagement from the public sector and created a venue for creating ownership and commitment.
- The Ministry of Mines and Energy played an important role in providing the Chapter with information that was not easily available such as information related to the new rules on mining exploration licenses.
- The findings and recommendations have been endorsed by government representatives who also committed to take action for mitigations of the identified risks.

The research phase for TI Cambodia has benefited from the following enablers:

- The Chapter set up an Advisory group, which was actively involved in implementation since the inception of the programme. The group of experts contributed with document review and provided information on the existing legal framework, helping the Chapter to narrow down the scope of the research.
The external researcher was hired from a consultancy firm and has a high level of expertise in the sector. Thanks to this, TI Cambodia really owned the tool and has been able to adapt it to the local context and to introduce corrective measures such as sub-indicators and a weightage system that contributed to a balanced assessment.

The Chapter Coordinator worked in close collaboration with the researcher, especially in the inception phase: they both attended the training in Berlin and worked with the Research Coordinator at TI-A on the adaptation of the tool to the Cambodian context.

Challenges

The fact that the Mining industry is currently developing made the access to public information on the sector challenging. In Cambodia only limited public discussion takes place about the mining value chain, and most of the public is not familiar with its different phases. This presented challenges in capturing the interest of the wider public and in adapting the language used by the programme to the level of knowledge of the audience. The same challenge is likely to be relevant for outreach and advocacy activities in Phase II, when the target audiences could include the wider public and stakeholders with a variety of backgrounds. Transparency and good governance are politically sensitive topics in Cambodia and often it has been difficult for the Chapter to openly discuss corruption: this could possibly affect advocacy and outreach actions foreseen for Phase II.

The Chapter encountered difficulties in engaging some stakeholders. In particular, local and Chinese companies to engage in consultations with the Chapter, thus creating difficulties in gathering a broad perspective. The Chapter did not manage to discover the reasons for this reluctance. The EIGF platform proved useful to bring different stakeholders together and it is considered by the Chapter as the most useful venue to continue engaging with stakeholders.

TI Cambodia could benefit from mutual discussions among M4SD implementing Chapters, but also in the wider TI movement, on what best practices have proved useful in engaging private sector stakeholders.

NGOs in Cambodia, like in several other countries in the region and globally, operate in a contexts of shrinking space for civil society. This poses challenges for all initiatives, and will remain relevant for Phase II of the programme.

Lessons Learned

The case of Cambodia shows the importance of having sufficient capacity in the Chapter to manage new projects, and face unforeseen additional workload in management. M4SD funds have been sufficient to cover for the hiring of the researcher, but additional resources were committed by the
Chapter. TI-Cambodia has been able to respond to this challenge thanks to the existence of an experienced team already in place. This challenge also illustrates the need of a thorough assessment of the management and support needs and capacity of the Chapter for Phase II.

In recent years, the mining sector received greater focus from the government. A new institutional arrangement has been established, creating a ministry dedicated to mining and energy sector. Moreover, there is an increase in the willingness to make the sector pivotal for the economic development of the country, thus requiring more transparency and accountability. The creation of the EIGF platform furtherly promoted tentatives to engage in an open dialogue and to create a multistakeholder mechanism for the management of mining resources. These developments (if continued) offer a promising venue for advocacy around the licensing processes in Phase II and illustrate the importance of support and interest from the Government.

The research process has been successful also thanks to strong cooperation between the researcher and the Chapter: this can contribute not only to a more effective research process but also to the internalisation of the new expertise within the Chapter itself. The role played by the Coordinator was instrumental in this, and suggests the need for a structured way of ensuring learning between the researcher and the Chapter also in other projects where external subject expertise is brought in by hiring consultants.
CASE STUDY PERU

Introduction

This case study is an annex to the TI Mid-term Process Evaluation of Mining for Sustainable Development Programme, and it is part of a series examining how national Chapters experienced a diverse set of successes and challenges due to the broad range of cultural and economic contexts in which they operate: case studies focus on Cambodia, Mongolia and Peru. The case study was conducted in October 2017.

The case study aims to answer three questions: 1) How was the programme implemented? 2) Which factors enabled successful delivery? 3) Did the Chapter experience any challenges in the implementation? The case study draws on desk research, including the review of quarterly reports from the Chapter, and two key informant interviews with the Chapter Coordinator and Deputy Executive Director of Proetica.

Context

Peru is an important producer in the global mining industry and its economy is highly dependent on natural resources exploitation: mineral extractions is one of the major source of economic growth for the country, representing half of the exports. The economy is estimated to have grown above potential at 3.9 percent in 2016 due to a peak in mining production.¹

Despite improvements in revenue and expenditure transparency, Peru’s governing institutions are still weak and corruption remains a problem. The country ranks 101/176 on the Transparency International’s Corruption Perception index.² Peru joined the EITI Initiative in 2007 and became a compliant country in 2012.

Overview of implementation

Proetica, the TI-Chapter in Peru, included M4SD into the broader framework of the Climate Governance Programme, implemented since 2012 in 8 countries. At the moment of joining, the Chapter did not have any content expertise in the mining sector, however, given the importance of mineral industry for the country, decided to participate.

The programme team in Peru is composed by one Chapter coordinator and one external researcher. Moreover, Proetica could count on existing programme staff supporting the programme administration. The Chapter expressed the need for more time and resources in order to properly engage with the stakeholders, and found the timeline of Phase I challenging. However, the Chapter managed to deliver

² Transparency International (2016) Corruption Perceptions Index
all activities on time.

Support from the TI-A and TI-S teams has been recognised as highly valuable across all stages of delivering the programme activities.

**Successes & enabling factors**

The Chapter managed to involve stakeholders from the public sector (such as the Natural Resource Governance Institute) as well as other CSOs and networks (such as Muqui Red de Propuesta y Acciones, Propuesta Ciudadana or SENACE), laying the foundation of solid partnerships. However the Chapter encountered challenges in building its network with the private sector. The involvement of the programme’s international External Reference Group was felt to have helped the Chapter to gain more visibility and credibility as experts in the mining approvals area with local actors. Being part of a high profile global programme was felt to critical to the success of the Chapter in pursuing work in this area.

Proetica has substantial experience in managing similar programmes, that include stakeholder engagement and a research component and which related with the exploitation of natural resources. This was an enabling factor that helped the successful management of Phase I. Moreover, M4SD has been included in the broader framework of Proetica’s Climate Governance programme. This allowed the exchange of expertise and human resources between programmes: for instance in the development of a network of contacts, since the team was already in touch with stakeholders involved in environmental protection and exploitation of natural resources, and was already knowledgeable of the institutional and policy context. Having experience in working with similar stakeholders (although in different programmes) helped the communication around corruption and good governance, which can be a sensitive issue in Peru.

The research process has been successful and was enabled by the profile of the external researcher. The external researcher has brought specific expertise and a substantial network of contacts in the mining sector. The researcher also helped the initial establishment of contacts with the stakeholders, and the coordinator managed to be present in all validation meetings as well as in some key interviews. This high level of involvement helped Proetica to own the research process, to build internal experience and to reduce dependence from the external consultant.

At the time of writing, Proetica does not yet have other confirmed streams of funds for Phase II. However, they managed to establish relations with the NRGI and discussed looking for other funds together after the end of the research phase.

Participating in the M4SD programme helped the Chapter to include enlarge the scope of their

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3 Natural Resources Governance Institute
research and advocacy work to include a vital sector for the country.

Challenges

The Chapter highlighted some challenges during the implementation of Phase I:

- It has been challenging to manage stakeholder expectations: the Programme’s bi-phased structure meant that engagement had to take place without being able to make concrete commitments for Phase II as it was not certain that the Chapter would continue to receive funding. In the relations with stakeholders, especially in the private sector, the Chapter could have benefited from more certainty on the intended activities for Phase II.

- At the beginning of the implementation, the Chapter underestimated the time and capacity required to manage the activities. This resulted in initial challenges in delivery, but Proetica managed to overcome these drawing on the internal resources of the Chapter and their experience in working with stakeholders. In the future, a better assessment of the amount of work that is expected to be generated could help in a more smooth delivery.

Lessons Learned

- A mapping of the internal capacity of the Chapter as well as previous experience in dealing with similar stakeholders would have been important to assess the enablers and challenges to successful delivery. In the case of Proetica, having experience with similar research and having enough in-house capacity to support and efficiently manage the programme proved important for the realisation of activities, especially as the initial estimate of resource needs turned out to be lower than the actual needs.

- Having contacts with the External Reference Group and in-person meetings with its representatives created positive impact for TI Peru and could possibly help in gaining more visibility for Phase II actions. Other countries where the Chapter does not have a strong network and track record in working in mining or mining approvals, could also leverage the prestige of the international programme to support their Phase II actions.

- The role of the coordinator proved to be important in overseeing the research and to establish contacts with stakeholders. The involvement of the Coordinator in activities that in other Chapters were more independently managed by the external researcher helped the Chapter to increase its own expertise, own the methodology, helping it more prepare to plan and deliver Phase II advocacy and outreach activities. In Chapters where the expertise rested mainly with the external researchers, the Coordinators and staff involved in advocacy and communications may benefit from building their knowledge on the mining sector in general and on approvals and
the research outcomes in particular.