Norad

Evaluation of Transparency International

Report 8/2010 – Evaluation
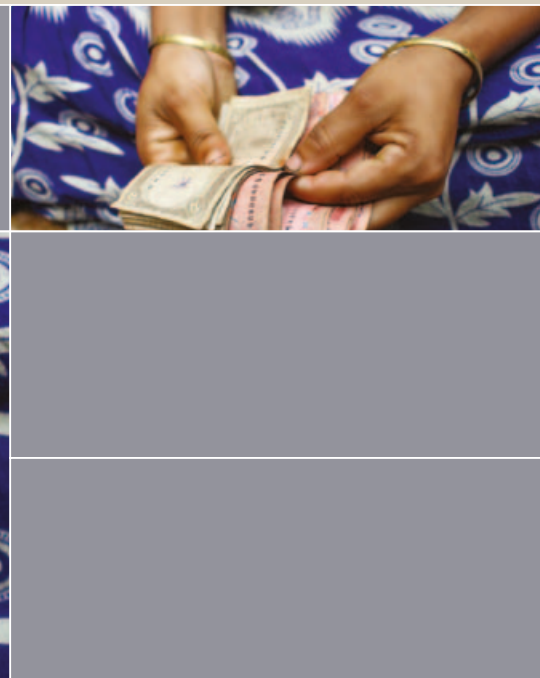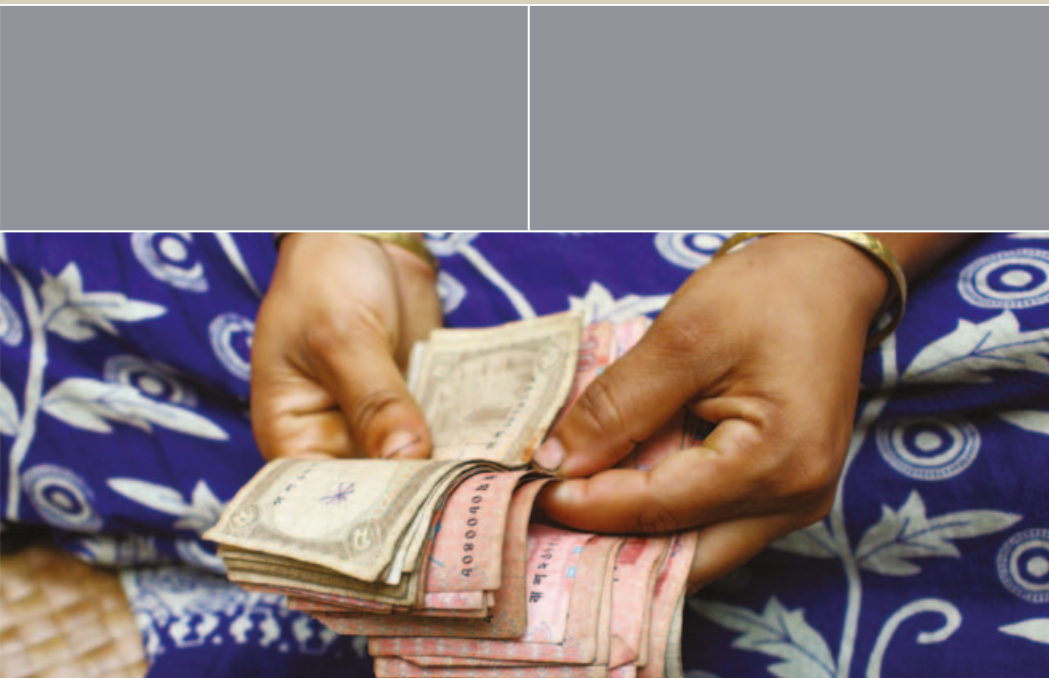
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February 2011

Channel Research

Acknowledgements

Preface

This time we have evaluated one of the larger international non-governmental organisations that has received support from Norway and other donors over the years. The evaluation has been carried out with full understanding and support from other partners to Transparency International.

Corruption as a theme in development cooperation and policies has become more urgently discussed as time has passed, and efforts to curtail the problem now range from searchlight on tax havens at the global level to tracking money in individual projects. The progress has been limited and victories relatively few. There is no doubt, however, that Transparency International has become a key player providing reference information in the debate on how to fight corruption.

This evaluation, focusing on the work of the Secretariat of Transparency International, confirms the success of the sustained global efforts of the organisation, and that it has managed to maintain a clear operating profile in its activities. There are concerns, about the diffusion of knowledge within the movement and the constraints of the project-based funding that prevails, particularly in the national chapters. The report also notes that the reporting of results of the efforts of the organisation mainly remains at an output level, the immediate achievements, and that there are less information on results at outcome level, meaning for instance change in actual behaviour.

These are issues to work with, and the report contains a number of recommendations, not only to the Transparency International, but also to its supporters. We are confident that this report will not be useful only to Norway as a donor, but also to the organisation in its efforts to further improve its work.

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Director of Evaluation

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Abbreviations and Acronyms

AC	Anti-corruption
AEW	Africa Education Watch
ALAC	Advocacy and Legal Advice Centre
AMM	Annual Membership Meeting
BMZ	German Federal Ministry for Economic Cooperation and Development
BPI	Bribe Payers Index
CEO	Chief Executive Officer
CIPE	Centre for International Private Enterprise
CPI	Corruption Perceptions Index
CSO	Civil Society Organisation
CVC	Central Vigilance Commission
DFID	Department for International Development (UK)
EITI	Extractive Industries Transparency Initiative
FCPA	Foreign Corrupt Practices Act
FSU	Former Soviet Union
GmbH	Gesellschaft mit beschränkter Haftung
IACC	International Anti-corruption Conference
ICC	International Chamber of Commerce
IM	Individual Member
IP	Integrity Pact
LTA	Lebanese Transparency Association
MABDA	Measuring Anti-Corruption Efforts and Building Demand for National Integrity Systems in Egypt and the Arab World
MAC	Membership and Accreditation Committee
MCP	Multi-country programme
M&E	Monitoring and Evaluation
NGO	Non-Governmental Organisation
NIS	National Integrity System
Norad	Norwegian Agency for Development Cooperation
OCR	Official Chapter Representative
ODA	Overseas Development Aid
OECD	Organisation for Economic Cooperation and Development
PACI	Partnering Against Corruption Initiative
PCA	Poverty and Corruption in Africa
PWYP	Publish What You Pay
SAI	Social Accountability International
SME	Small/Medium Enterprise
SRI	Socially Responsible Investment

SWOT	Strengths, Weaknesses, Opportunities, Threats
TI	Transparency International
TI-I	Transparency International-Indonesia
TIRI	Making Integrity Work
TI-S	Transparency International Secretariat
TI-UK	Transparency International-United Kingdom
TISDA	Transparency and Integrity in Service Delivery in Africa
ToR	Terms of Reference
UNCAC	United Nations Anti-corruption Convention

Terminology

This report follows Transparency International's usage of the following terminology:

- Board: Board of Directors of Transparency International.
- Chapters: National chapters of Transparency International, national chapters in formation, national contacts and emerging contact groups of Transparency International.
- Movement: Transparency International's Individual Members, International Board of Directors, International Secretariat, Advisory Council, Senior Advisers and all those affiliated to national chapters, chapters in formation and contact groups.
- The report will use interchangeably TI-S and Secretariat to mean the same institution. When the report refers to TI this is considered equivalent to the movement.

Chapter 3, on the TI Governance structure, provides more details.

Executive Summary

Executive Summary

Introduction

This evaluation has been commissioned by the Evaluation Department of Norad to assess the efficiency and effectiveness of the Transparency International Secretariat (TI-S) in combating corruption. The findings are the result of a review of documentation produced by Transparency International (TI) and its partners, as well as a general literature review, together with interviews with some 190 persons, and visits to fifteen chapters. The work was carried out by a team of six people over a six-month period in 2010.

The topic of corruption – far from being an unmentionable taboo – is now squarely on the international political and development agenda. TI has contributed to this development through its research and indices, active advocacy in international initiatives, and country-level work.

However, while progress in advancing transparency and advocacy has been made, there is little evidence that the problems associated with corruption are diminishing at the global level. The evaluation sought to concentrate on the strengths and weaknesses of TI-S in confronting this challenge, with a view to formulating recommendations for Norad and other donors.

History of Transparency International (TI)

The TI movement grew rapidly after its foundation in Berlin in 1993, and by 2000 there were already some 70 national chapters supported by TI-S in Berlin. The movement adopted a global perspective, articulated under a common mission statement, to create change towards a world free of corruption. The relationship between TI-S and the chapters was – and has remained – symbiotic. TI-S's legitimacy and authority derives from the chapters: they in turn carry more weight in their own countries because they are part of a wider international movement.

Transparency International (TI) Governance Structure

In the period since 2000, which is the main focus of this evaluation, TI refined and consolidated its governance structures. Within the TI movement TI-S provides a leadership, coordination and support function. It works within a complex system of groupings that have well specified roles: Advisory Council, Individual Members, Board, and the national chapters. By 2010 the number of staff in TI-S was 120, and there were 90 chapters registered. The annual revenue of TI-S has grown from €2.8 million in 2000 to €20 million in 2010.

Important achievements during this period include the introduction of a Membership and Accreditation process to ensure that national chapters comply with TI's basic rules, and to exclude those that do not follow certain core principles. In November 2010 TI completed an extended review process that was coordinated by TI-S and resulted in the formal adoption of the *Transparency International Strategy 2015*. This is the most detailed strategy document produced to date and reflects a significant maturing of the organisation.

Transparency International Secretariat (TI-S) has played a key role in protecting and developing the TI 'brand': this is in itself a valuable asset that provides all the parts of the movement with a credibility and an access to resources that few other comparable organisations in the world can match. These resources are in part financial but above all intellectual, and include the wide network of contacts and sources of expertise.

Relations with Donors

The resource base of TI-S has gradually shifted over the years, with a decreasing proportion from donor governments, and increasing reliance on foundations, and, to a much lesser extent the private sector (6%). The funding has become more targeted (earmarked for specific programmes), and increasingly oriented toward the lower-income countries, especially Africa and the Middle East, reflecting broader changes in donor thinking on priorities for development effectiveness.

This shift however has not matched the evolving nature of corruption worldwide, as new centres of power, such as the newer members of the G20 countries, are insufficiently covered by TI. Political funding and the private sector have also become significant areas in this field.

In recent years there has been an increased emphasis on multi-chapter programme funding coordinated by TI-S. This approach makes it possible to address broad regional issues, attract funding to chapters that might otherwise find it hard to secure, and build capacity. However, it also tends to increase administrative work in TI-S, and thus indirectly to reinforce the top-down dynamics in the movement.

The dialogue that TI-S maintains with its donors is constant, but more limited than it could be. This is due to the paucity of meetings with most of the donors (with notable exceptions), and the diversity of reporting formats. The dialogue could be enhanced by a more widespread use of advanced Monitoring and Evaluation (M&E) techniques than is currently applied.

This last point deserves particular mention, as the reporting that TI-S provides contains mostly descriptions of activities, rather than the broader effects achieved. The organisation could take better advantage of the wealth of contextual information that its indices and research capture. The reporting does not point to correlations between TI's work and new anti-corruption developments. This difficulty to describe impact is all the more surprising as the evaluation has found frequent evidence of successful initiatives that are under-reported.

Research

Research stands out as one of TI-S's most significant contributions to the effectiveness of the TI movement, to the extent that TI-S is frequently thought of as a 'think-tank' rather than an NGO.

TI-S serves as the guardian and coordinator of the movement's global research products, the various international surveys and indices, the annual *Global Corruption Report* and a series of position papers. The TI-S team also acts as a source of expert advice to the wider movement, for example by providing advice on conducting surveys. At the same time, the chapters clearly have an enormous amount to learn from each other. Expertise is shared 'horizontally' between chapters, but more needs to be done to facilitate such exchanges. The development of a new TI Intranet is an important step in this direction.

Both inside the movement and beyond it, the evaluation found a general view that the Corruption Perceptions Index (CPI) was both a benefit for TI and something of a burden. It remains the product for which TI is most well-known and still gathers wide publicity. However, its limitations as a corruption indicator are widely recognised. TI-S has sought to address these limitations through other kinds of surveys, notably the Bribe Payers Index (BPI), the Global Corruption Barometer (GCB) and through deeper research in the form of the National Integrity Systems assessments. The evaluation concludes that the search for a single indicator or instrument is illusory in any case.

TI has played a significant role in lobbying governments to draft and sign the OECD Anti-bribery Convention (1997), the UN Convention against Corruption (UNCAC, 2003) and the various regional conventions. Progress in implementing the conventions has been slow, but the evaluation concludes that it would have been even slower without the TI awareness campaigns that helped prepare the ground for the conventions, and the continuing lobbying afterwards.

Anti-corruption Tools and Programmes

The Integrity Pact (known internally as IPs) is a tool aimed at preventing corruption in public contracting. The concept was first developed in the 1990s. The experience of individual chapters varies, but Integrity Pacts are now widely advocated throughout the movement, and can be considered to be one of TI's 'flagship' tools.

The TI-S private sector team serves as a source of expertise within the movement, advising national chapters on their own programmes when called upon. At the same time it works 'horizontally' with other international business and civil society organisations. TI-S can claim a high degree of effectiveness in establishing a broad international consensus on the principles of private sector anti-bribery controls. However, the take-up of these tools within the movement – as distinct from externally – has been highly uneven. The evaluation finds that there should be a greater strategic focus on the private sector across the movement.

Coalition-building and Advocacy

From the outset, the TI movement has placed a strong emphasis on coalition-building both within the movement and beyond it. Its ability to carry out complementary work on related issues, combining various approaches without undermining the consistency of its focus, is an important aspect of its efficiency.

Recent examples include the successful and still expanding development of Advocacy and Legal Advice Centres (ALACs - referral centres where individuals with corruption-related problems are advised and guided to the appropriate public investigative body) in some 39 countries. TI-S has played an important role in fostering and facilitating the development of the ALACs programmes. These successfully link civic education and legal reform with individual advocacy. The initiative had the potential to erode the movement's 'non-investigations' policy' and the 'non-threatening' approach of TI, but this has been well managed.

TI has been involved in the discussion on development aid and corruption since its inception and TI-S has built some effective relationships at the international level such as with the OECD, the OECD-DAC committee and the U4 anti-corruption resource centre in Bergen. However, it appears that that involvement has been mainly focused on corruption in massive disasters such as the Tsunami or conflicts such as the incidents in Georgia following operations in South Ossetia. There is a need to understand the political economy and governance environment of developing countries, in particular how networks of power relations, political parties, ethnicity, religion and powerful actors in the private sector interact.

Both TI-S and the individual chapters have taken a prominent part in civil society and multi-stakeholder coalitions working to combat corruption in the extractive industries (oil, gas and mining). Among other initiatives TI has been a key participant in the Publish What You Pay (PWYP) campaign, and has close links with the Extractive Industries Transparency Initiative (EITI). The emergence of allied organisations working in the same area reflects the success of the coalition approach.

Managing Change

The greatest challenge facing TI-S in terms of efficiency comes from the increasing importance of maintaining a strong centre of gravity within the movement without creating unnecessary bureaucracy. The growth of the activities and of the needs of the chapters (including support for chapter-to-chapter communications) means that there is increasing pressure on the middle and upper management levels of the Secretariat.

The staffing both of TI-S and, in many cases, the movement as whole, is remarkable for its quality, but also its youth, as well as a high turnover of staff. The evaluation concludes that the shortage of long-term personnel at the middle management levels increasingly affects delivery, and that the current level of resources dedicated to remedy this situation (as of 2010) is not adequate for the aims of the chapters and particularly the Secretariat.

Conclusions and Recommendations

Transparency International Secretariat (TI-S) has succeeded in maintaining a clear operating profile and developing a sustained global effort that is directly relevant to the field of corruption. The global governance of the movement is distinctive, with TI-S providing a unifying reference point, protecting in an effective way the 'signature' or 'brand' of the movement. The balance between TI-S and the chapters remains fluid and at times contested but, overall, the current model works well.

The most significant constraint – perhaps better expressed as a 'challenge' – concerns the diffusion of knowledge within the movement. As discussed, knowledge flows in several directions: most obviously from TI-S to the chapters, and through the chapters to wider constituencies in their respective countries; and from the chapters to TI-S and thence to wider global audiences. At the same time, several respondents identified a need for more horizontal exchanges between chapters that are not necessarily mediated by Berlin.

A second central constraint is the project-based funding that prevails in the chapters, which TI-S is only partly able to balance through its own funding to chapters which is also restricted funding earmarked for specific pre-set priorities. Donor-driven priorities do not necessarily reflect TI priorities such as advocacy and organisational capacity building support to chapters as well as the need to address both grand and petty corruption and to focus on countries in low, middle and high income countries.

An important aspect of efficiency concerns the reporting of results, and the development of new strategies in response to change. Reporting still remains dominated by reporting on outputs (few evaluations have been carried out, for example) and particular project strands. This means that significant achievements often are not recorded, or not recorded properly, and that TI misses the opportunity to draw a connection between the success of specific projects and the broader anti-corruption picture.

The evaluation consequently recommends three broad areas of change to donors (Norad in particular) and TI:

1. Donors should provide long-range funding to TI-S and supplement that with embassy-based funding to the chapters along a common priority framework, with additional donor resources earmarked to Monitoring and Evaluation (M&E).

We recommend that this common priority framework should be based on the new five-year *Transparency International Strategy 2015* which, as noted above, was under discussion while this evaluation was taking place, and was formally adopted in November 2010. The document identifies ten strategic priorities linked to the core themes: "promoting our common focus", "empowering our diversity", and "organisational development". On the basis of discussions with TI and between donors, the framework should identify critical funding gaps to support the strategy. These discussions could take place during the annual donors' meeting with TI, supported by appropriate advance preparation.

In the light of this dialogue, the priority framework should define specific objectives that are consistent with the donors' overall policy objectives. As one example, we recommend that it should earmark additional resources for M&E in particular. Embassy funding will naturally be influenced by local priorities. However, if there is an agreed international priority framework, it will be easier to ensure that local funding is compatible with the overall strategic objectives both of the donors and of the TI movement.

Donors should require a clear identification of progress concerning the following aspects:

- *Clarification and monitoring of TI-S's support strategy for the national chapters.* We envisage that this should take the form of focused TI-S support for fundraising, monitoring, and inter-chapter exchanges. Donors should require clarification of the roles of chapters within the governance of the movement. A more clearly defined modus operandi for communication between chapters, would allow for more effective issue-based or practice-based forms of cooperation.
- *A TI-S-led Planning, Monitoring and Evaluation process*. We envisage that the TI-S efforts will build on the recent strategy consultation to identify specific objectives that are designed to meet the new strategy's overarching goals, as well as the processes that TI will adopt in order to monitor progress. We recommend that TI-S should develop a consistent definition of performance assessment terms and concepts. This should facilitate TI's dialogue with donors by clarifying the type of performance that is being tracked, and its contribution to the movement's overall goal of combating corruption.

The priority framework would contain objectives of a more specific nature than those to be found in donor policy statements. Adopting it should hence not require realignment of donor targets. In essence the objectives pursued by donors as regards TI would not change, they would simply be rendered more cogent by further specifications. While Embassies naturally operate according to their own funding frameworks and earmarking priorities, an awareness of the global priority framework would assist in creating complementarity. It is acknowledged that earmarked funding will remain prevalent. Nonetheless, there is inherent value in being able to fit these targeted funds into a broader policy framework.

- *A commitment to strengthen specific levels of management and expertise within TI-S*. The areas to be addressed include personnel management, and career planning, although we do not envisage a significant expansion in the size of TI-S. Working-level staff should receive specific financial allocations for travel, training and communication, to strengthen chapter to chapter communication. Specific forms of chapter support, in particular as regards security, planning, knowledge-sharing and M&E, should also receive targeted funding.

2. Progress should be annually discussed with donors, with the possibility of interruption should certain standards not be met.

Funding decisions should be informed by independent evaluations as well as internal M&E, and be made conditional on performance. This approach will address

the difficulties that TI faces in funding certain priority areas, and reduce the detrimental effect of donor trends defined by factors that have no relation to anti-corruption. An example of this is the negative trend towards more support for government budgets and less to civil society due to the lower priority given to Middle Income Countries and to alignment with government priorities in developing countries. An improved approach will in addition limit the negative effects of restricted funding, which is often based on country-specific standards of living, or even thematic considerations. Spending efforts need to be truly transnational and integrated. Following this line of thinking, funding for private sector initiatives, and funding for organisational development, should be priorities of the dialogue.

The allocation of subsequent phases of funding should depend on TI's ability to define strategic areas of intervention and to report on the influence that it has had in these areas. Poor performance should lead to reviews and adjustments, linked to the evidence. As discussed above, it is not expected that funding through Embassies will follow the same strategies as global funding, but it should as far as possible be related to the donors' common priority framework.

Following the above two recommendations will mean that TI-S becomes still more of a knowledge centre, carrying out more capacity development, and facilitative support for chapter-level issues than is currently the case. The Secretariat should enhance its core functions, including M&E, and personnel management.

3. TI-S should seek to address the key constraints that do not allow it to be more supportive of the chapters.

The first step is to make the chapters in the more developed countries more self-sufficient in funding. This could be approached in a number of ways. One is premised on a more intense and nuanced relation with the business sector, whereby more recognition should be given to the fact that corruption is now recognised by reputable companies as a critical risk, and that collaborative approaches are required. Some chapters have reservations about accepting private sector funding in case this compromises their independence and, in order to address these concerns, TI-S could work with them to develop guidelines and rules of engagement clarifying what is and is not acceptable to the movement.

The second would be based on the sale of research products, including greater use of interactive media. This is distinct from providing consultancy services, but would rely on the utilisation of existing information as an asset to generate funds. While there are issues to be addressed regarding the public nature of the documents, based on their source of funding and their destination, it could very well be that far from creating a barrier to dissemination, payment for research defined by the market becomes a complementary source of funds.

Similar to the support from the EU to developing National Integrity Systems assessments, or the multi-country programmes, TI-S could also assist regions in obtaining project funding for common issues that pertain to a group of chapters or a region.

Such support would also provide TI with opportunities to conduct more research and analysis, research that is issue-based and tracks closely local developments.

The general areas of recommendations made above for donors should naturally be reflected as priorities for TI-S as well. This includes:

- Defining certain centres of excellence, to be cultivated both in Berlin and elsewhere, based on enhanced monitoring and evaluation in relation to trends in corruption
- Weaker chapters should receive more necessary assistance, based on a framework that identifies country needs and pinpoint particular areas where action is required. TI-S should reinforce existing initiatives in the area of electronic networking and transfers of information, as well as applying social media to intra-movement communications and advocacy. Dedicating more resources, and clearer roles, could involve protection of members of the movement that are situated in a highly insecure environment.
- In the case of M&E, more priority needs to be given to context, and anti-corruption efforts. Results need to be monitored on the basis of the specific impact of the developed activities.

Main Report
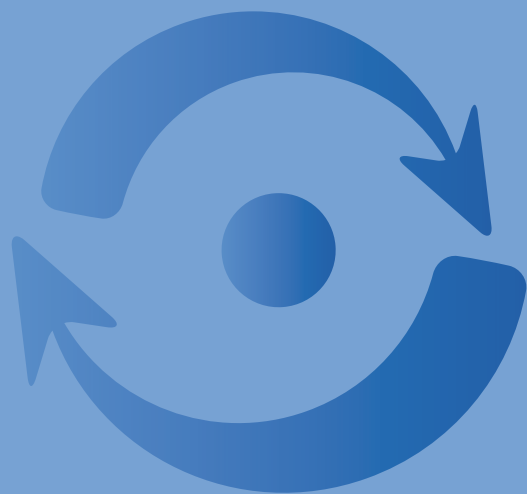
1. Introduction and Methodology

1.1 Reason for the Evaluation

This evaluation has been commissioned by the Evaluation Department of the Norwegian Agency for Development Cooperation (Norad) to assess the efficiency and effectiveness of the Transparency International Secretariat (TI-S) in combating corruption. This enquiry takes two broad directions: the evaluation is to provide an analysis of the organisation in its context, in terms of the results it has achieved, as well as its main strengths and weaknesses. The evaluation is also to inform the relationship between Norad, other donors, and TI, on the basis of a good evidence base.

The report covers the period from 2000 up to 2010. The mandate of the evaluation is defined in the Terms of Reference (ToR), which were prepared in consultation with other donors and TI-S itself and is contained in Appendix 1.

The Transparency International (TI) movement is made up of 90 National Chapters (chapters), 31 Individual Members (IMs) and a Secretariat based in Berlin. The chapters are all independent civil society organisations registered in their own countries and internationally affiliated with TI. Chapters have their own Boards and membership structures that set their own agendas. The international governance structure includes an International Board of Directors and an Advisory Council that serves the movement overall. Together, these diverse parts of the movement are bound together through their shared allegiance to TI's Statement of Vision, Values and Guiding Principles[1]. Since its foundation in 1993, Transparency International (TI) has established its place as a leading global Civil Society Organisation (CSO) working on anti-corruption issues.

The topic of corruption – far from being an unmentionable taboo – is now squarely on the international political and development agenda. However, while progress in advancing transparency and advocacy has been made in particular countries and sectors, there is little evidence that the problems associated with corruption are diminishing at a global level. The challenges that the TI movement has faced – and continues to face - in the 21st century therefore have less to do with identification of corruption as a source of concern, but much more to do with the need to identify solutions, and to address them in a focused and relevant manner. Against this background, there is a clear requirement to learn from the experience of the past decade as a basis for future planning and effective management.

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1   See www.transparency.org/about_us/organisation/statement

The prime audiences for the report are TI, Norad and other donors, as well as key stakeholders in the fight against corruption. At the same time, we expect the evaluation to be of benefit to a wider audience, including other international donors and the public.

Based on the findings a set of recommendations are proposed that will enable TI-S to address weaknesses. These are not exclusively addressed to Norad, but to all decision makers interested in this field.

1.2 Analytical Framework

The evaluation is based on a sample of fifteen chapters, and a selection of programmes and tools. The ToR point to standard data collection methods ("The evaluation team should make use of etc..."). The primary sources of information have derived from interviews, workshops and documents collected at TI-S and in the countries where the fifteen national chapters are based. The interviews were semi-structured and based on a general set of similar questions.

The selection of six National Chapters for field visits was informed by our initial interviews in Berlin and Oslo, by their potential relevance to our hypotheses, and in part by the country expertise of the consultants. Factors taken into account include: levels of funding, level of interaction with TI-S, the context in which they operate, and regional balance (Americas, Africa, Europe and Central Asia, the Middle East, South and East Asia and the Pacific).

We bolstered these standard tools by the creation of a Consultative Group which included persons who were primarily not from TI-S but were drawn from the Board, from other parts of the movement, or were considered to be authoritative experts in anti-corruption research and practice. They also included staff of Norad that were not from the Evaluation Department.

This group was essentially a virtual community (consulted by phone and e-mail), some of whom attended meetings to discuss the emerging conclusions and recommendations, held in connection with the 14th International Anti-Corruption Conference (IACC) in Bangkok in November 2010.

The team used a set of evaluation criteria and terms derived from evaluation usage, with the following formulation:
- Relevance is defined as the alignment of programmes and tools to the needs of anti-corruption efforts, and the objectives of the TI movement. The questions asked in the ToR in relation to this criteria is whether the activities are aligned to the objectives, based on adequate analyses, and whether the objectives are themselves responsive to the changes in the environment and to donor priorities. Questions are also asked as to whether the support of the Secretariat adds value to the chapters.
- Effectiveness is defined as the degree to which stated outcomes have been met. The questions in the ToR concern progress made, the constraints met, and opportunities for improving the results-based management of the organisation.

- Efficiency is the degree to which maximal results are achieved with given resources. Here the enquiry concentrated on timeliness, coordination, and value for money in management.
- Sustainability is the ability of results to continue after the end of an initiative. The ToR ask about financial viability, the degree of consultation of partners, the building of chapter capacity, and knowledge management.
- Output is a definable quantity that results from a service or activity.
- Outcome is the consequence of the use of an output in a target population.
- Impact is the consequence of an outcome in the area of influence of an initiative. The ToR ask about the signs of influence of TI-S, the negative as well as the positive effects.

The conclusions of the evaluation are couched in the light of these questions, as well as the implications that this has on the relationship of Norad, other donors, and TI-S. It is important to highlight here that the evaluation does not intend to assess the overall performance of TI-S in relation to certain desired forms of impact, but rather to highlight elements of strength or weakness that are important for the formulation of future external funding policies.

The evaluation verified the evidence it was collecting essentially by triangulating between written, oral and observed evidence (for example tracing quotations in national newspapers in Guatemala to specific institutions of government and relating those back to the work of the chapter, and behind it to the support given by TI-S). This process was explained to the chapters in the countries visited, and then to the Consultative Group, to ensure that the judgements were based on sufficient evidence.

1.3 Evaluation Process

The evaluation began in mid-June 2010 and has taken place through three successive stages:

Inception Stage (June to early July)
Taking a contextualised approach to TI-S, the movement, and the web of relations that they have woven, the Inception Stage allowed the team to structure the evaluation questions as a set of cross-cutting themes. These were then explored through certain working hypotheses which framed the case study selection. These case studies were identified on the basis of a preliminary document review and refined through interviews in Berlin. The case studies include a combination of specific national chapters and aspects of TI-S's work.

The case study aspects are: the position of TI-S in the movement, the management of the Secretariat, relations with donors and the resource base, research and advocacy, tools and programmes, and coalition building. The fifteen case study countries are: TI Bangladesh, TI Georgia, TI Guatemala-Acciòn Ciudadana, the Lebanese Transparency Association (TI's chapter in Lebanon), TI Indonesia and TI Kenya. Visits have also been made to TI Denmark, the EU representation of TI-S, TI Fiji, TI Ghana, TI Japan, TI Netherlands, TI UK, TI USA and TI Norway. This takes the number of national chapters interviewed to fifteen.

Data Collection Stage (July to October)

The evaluation team was given full access to information by TI-S and the national chapters, and spoke to some 190 persons around the world. These include not only TI-S personnel (current and former), but also experts in the anti-corruption field, chapter Board members and staff, partners, other civil society organisations and academics, and in some cases some of the communities involved in TI's work. These are listed in Appendix 2.

The documents reviewed included:
• TI-S Financial Reports, Work Plans and Implementation Plans
• TI Annual Reports and Strategy Documents
• TI-S HR Manual
• Documents provided by Norad
• External reports

Synthesis Stage (October to November)

The drafting of the report was complemented by a debriefing with the Managing Director of TI-S and his staff, and with discussions during the 14th International Anti-Corruption Conference (IACC) in Bangkok in mid-November 2010. An Emerging Findings Note guided these discussions. This document is the final report and will be presented in Berlin to a broad audience in March 2011.

1.4 Presentation of the Findings

The evaluation had full access to all persons of interest and to the relevant documents. The breadth of the activities carried out, the diffuse and often secretive nature of the field of corruption, posed real challenges in establishing the directions of research. The Monitoring and Evaluation (M&E) framework of TI is still incipient, relying predominantly on descriptions of activities and making links to broader changes. While TI-S is currently developing a more analytical form of reporting, the evaluation was not able to rely on this to corroborate its own findings.

The report combines a descriptive chapter on the evolution of TI as a movement, and an overview of governance and sources of funding, before analysing the results achieved under three broad categories: knowledge, specific programmes, advocacy and coalitions. The findings allow the evaluation to return to the questions of management and the manner in which TI-S has addressed the constraints. The conclusion has been drafted in line with the main questions in the ToR, while the recommendations are addressed primarily to donors.

2. History of Transparency International

2.1 The 1990s

TI was founded in Berlin in 1993 by Peter Eigen, a former World Bank executive, together with a group of like-minded individuals with extensive international experience. These included Fritz Heimann, a senior legal counsel from General Electric; Kamal Hossain, a Bangladeshi former minister; Michael Hershman a US-based security specialist; Joe Githongo, the head of a Kenyan accountancy firm; Frank Vogl, a former Information Director of the World Bank and others.

The TI Secretariat (TI-S) was established with a specific mandate to provide support, co-ordination and advice to the growing number of TI national chapters and leads the organisation's international agenda. The Secretariat's relationship with chapters is one of mutual support. It focuses on the global and regional fight against corruption, and assists national chapters in enhancing their anti-corruption skills. The Secretariat coordinates initiatives within geographical regions and provides methodological support on the tools and techniques to fight corruption. The Berlin-based Secretariat also serves as the driving force on international issues such as anti-corruption conventions, and other cross-border initiatives. It serves as a knowledge management centre, capturing and disseminating best practice and developing new approaches to tackle corruption[2].

The founders established a distinctive ethos, which – though sometimes contested - has continued to guide the movement. TI has valued collaboration between different groups of civil society, government and business stakeholders, as well as with other CSOs working on related issues such as human rights and the environment, but it has eschewed investigation into particular cases, and has tended to stop short of overt confrontation with centres of power, whether in government or business. As one of its founders told the evaluation team, "We never saw ourselves as a 'placard-wielding NGO'". Rather, its approach – reflecting the status and experience of its founders – has been to work with organisations from the inside, with a strong focus on technical solutions to corruption problems.

In the course of the 1990s the TI movement grew rapidly, so that by the end of the decade there were already some 70 national chapters supported by the TI Secretariat in Berlin. The movement from the outset gave itself a global perspective, articulated under a common mission statement to create change towards a world free of corruption[3].

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2   TI Website
3   TI-S Strategic Plan , 31 January 2004, section II

It set itself a number of global priorities[4] under which it organised a very broad range of activities that we have categorised under knowledge, tools and advocacy:
- Reducing Corruption in Politics (e.g. Political Party and Campaign Financing)
- Curbing Corruption in Public Contracting
- Enhancing Anti-corruption Standards in the Private Sector (e.g. Business Principles)
- Advancing International Conventions against Corruption
- Securing Access to Information
- Combating Money-laundering and Supporting the Recovery of Stolen Assets
- Fostering Anti-Corruption Education and Ethics
- Preventing Corruption in Aid and Development Cooperation
- Advancing the Accountability of Civil Society Organisations
- Promoting Judicial Reform and the Application of Anti-Corruption Laws
- Tackling corruption in Specific Industries and Sectors (e.g. environmental)
- Measuring Corruption.

The first four bullets represent what have been called Key Global Priorities, and which provide the priority forms of impact that the movement sought to achieve.

2.2   Identification of the Operational Model

A key part of TI-S's role has been to represent the movement in international forums such as the Organisation for Economic Cooperation and Development (OECD), and to provide a central source of expertise and support for the national chapters.

TI's early achievements also include the publication in 1995 of the first Corruption Perceptions Index (CPI) which ranked and rated states according to their perceived corruption levels. In 1996 then World Bank President James Wolfensohn made a major speech referring to the 'cancer of corruption', thus breaking a longstanding tradition whereby the World Bank had avoided discussing the topic. TI lobbied successfully for the OECD Anti-bribery Convention, which was signed in 1997 and came into force two years later.

In its first seven years TI could claim a considerable amount of credit for bringing the issues of transparency and corruption into the international political arena. However, it was understood internally that this in itself was insufficient. It was not enough simply to advocate for the fight against corruption and call for anti-corruption reforms: the challenge was to implement measures which would create the right environment for governments and businesses to prolong the efforts.

From its early days the TI movement has been decentralised, with each national chapter raising its own funds, and retaining a high degree of institutional autonomy.

This decentralised approach arose partly for pragmatic reasons: TI simply lacked the resources to fund national chapters from the Secretariat. However, it also reflected a widely held view that, while corruption is an international problem, each country

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4   Strategic Framework 2004

must develop – and take responsibility for – its own solutions. The diversity of the TI movement in terms of culture, capacity and focus is one of its particular strengths. However, as will be discussed in this evaluation, it has also presented significant challenges.

2.3 Transparency International (TI) Consolidation and Broadening of the International Agenda

In the period from 2000 up to the present, TI has consolidated and strengthened the organisation, as well as expanded its international agenda. The organisational consolidation is seen through its formal strategy development. TI launched its first strategy document in 2003, followed by a second in 2007. In November 2010, it concluded its most significant strategy review process to date with the ratification of its five-year *Transparency International Strategy 2015*.

Meanwhile, many of the founders have passed on their responsibilities to a new generation of leaders. Peter Eigen stepped down as Chairman of the TI Board in 2005, although he is still Chair of the TI Advisory Council and Fritz Heimann (one of TI's founders) is still a member of the same council.

Landmark anti-corruption developments in the 2000s included the signing of the United Nations Convention Against Corruption (UNCAC) in 2003, that came into force two years later. However, as will be seen, implementation both of the OECD convention and of UNCAC has been highly uneven. At the national level, countries such as Indonesia have made important advances, in Jakarta's case through the introduction of a powerful Corruption Eradication Commission (KPK), but these gains are far from secure.

Meanwhile, several of the interviewees commented that patterns of corruption have changed, and in many cases have become more sophisticated, for example through the skilled use of international money transfers. In many countries – for example parts of Central America - organised crime threatens to capture key government institutions, and thus to undermine anti-corruption frameworks. The ability of these actors to influence decision-making is extremely high, not least through semi-licit political funding. This has made it even more difficult to implement anti-corruption frameworks such as legislation and institutional initiatives.

2.4 Transparency International (TI) at a Crossroads: Strategic Choices

TI as a movement has been one of the most coherent global organizations focusing on the struggle against corruption and on issues of transparency. Over the last ten years it has maintained a well-defined operational and research profile, reaching audiences and constituencies in the broadest possible range of countries and forums, given the resources at hand.

This ability to remain on track in a complex field is a notable feat for a CSO. However, TI and TI-S in particular have experienced what can be described as creative tension between different orientations, and these will pose an increasing challenge in the future. Some of the key tensions (not necessarily mutually exclusive) seem to be:

- How far is the movement centred on the Secretariat, and how far is it driven by semi-autonomous chapters? Does it have a single voice, or several voices?
- Is TI-S a moderator, or more of a facilitator? If the latter, is it to allow the chapters to grow as they see fit within their capabilities and with minimal external controls? Or should it be more interventionist, addressing problems, and building up chapter capabilities?
- What is the predominant funding model: should it be core funding channeled through the Secretariat to the chapters? Or should it be highly diversified, depending on the context?
- Is TI-S primarily a think-tank producing nuanced research that explains how the world is? Or does it serve a network of advocacy groups with specific, targeted policy objectives that will 'change the world'?
- Is it a source of expert advice on the 'art of the possible' inside government and business circles? Or are its members more comfortable 'speaking truth to power' from the outside?
- How far is TI-S a source of technical expertise? Or is its prime role to paint the 'big picture', leaving the details to others?

Such tensions are highly revealing of the difficulty of preserving the purpose of a single large organisation in the very broad and dynamic field of anti-corruption and citizens' action. The next sections of the evaluation explore, in line with the terms of reference, the degree to which TI-S has developed the appropriate resources and identified the most relevant objectives, combined in a well-managed execution.

3. Transparency International Governance Structure

3.1 Components of the Movement

TI has a complex structure, which seems to be a product of its history. The organisation was established and registered in Germany, and has been moulded to meet the requirements of German law. Later the structure has developed as a response to the evolving demands of an expanding international organisation.

The overall governance has been represented in the following manner by TI-S:
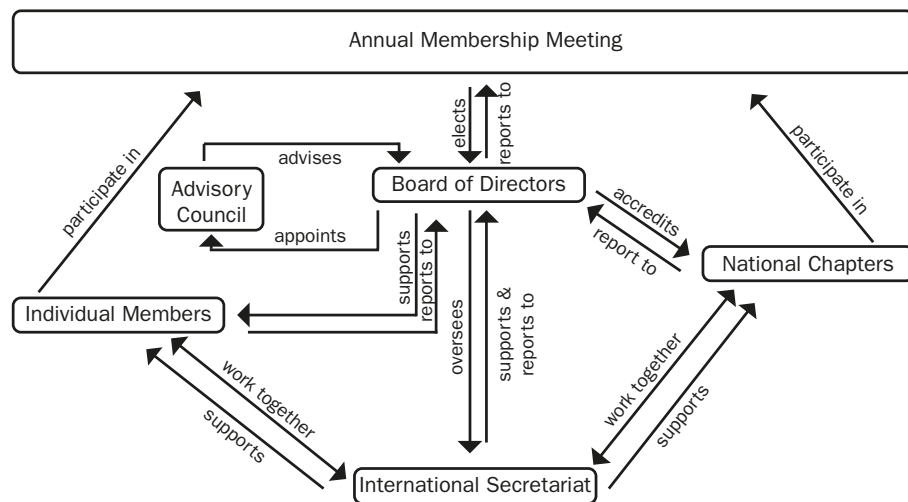
As illustrated in this chart, the movement's organisational structure includes:

- *The Secretariat.* The secretariat is at the heart of TI, and is accountable to the International Board and the wider TI movement, through the Board of Directors and the Annual Membership Meeting.
- *National Chapters.* TI has some 90 accredited chapters (on the accreditation process, see below), plus a handful of 'National Contacts' and 'chapters in formation' that still await full accreditation.
- *Annual Membership Meeting (AMM).* This is the ultimate decision-making body and, as its name suggests, meets once a year. Official Chapter Representatives (OCRs) and Individual Members (IMs) each have one vote. Meetings normally take place alternately in Berlin and in another city coinciding with the biennial International Anti-corruption Conferences (IACCs).
- *International Board of Directors.* The AMM elects Board Members. The Board in turn appoints the Managing Director of TI-S, and has overall responsibility for the

accreditation process supervising TI's activities and reviewing the work of the Secretariat on behalf of the TI movement.

- *Individual Members (IMs).* The existence of the IMs was in the first instance a response to German legal requirements. The current IMs are experienced anti-corruption practitioners who are judged to make a significant personal contribution to the movement at global level. They have voting rights at the AMM and are eligible for elections on the international Board of Directors. The total number of IMs may not exceed half of the total number of chapters with votes at the AMM.

- *Advisory Council.* The Advisory Council advises and is appointed by the Board. Advisory Council members meet on the occasion of TI's Annual Membership Meeting. The Council consists of a group of some 30 highly experienced individuals, including former US President Jimmy Carter, former Amnesty International Secretary General Irene Khan, former UN High Commissioner for Human Rights Mary Robinson and others. It provides an additional source of strategic advice for the movement.

The structure provides the system for TI to identify and deal efficiently with its main challenges, including a high degree of internal consultation. This is particularly apparent in the Annual Membership Meetings (AMM). These are preceded by a series of internal workshops where TI-S members and the chapters share experience and debate new proposals before these are submitted to the main decision-making assembly. This is an extensive process that helps provide for the articulation of a common view on the complex field of the struggle against corruption.

For example, at the most recent AMM in Bangkok, workshops discussed experience in Integrity Pacts, new and developing ideas about advocacy and climate change, and the controversial topic of paid consultancy services by TI chapters, which is part of an ongoing discussion in the movement. The AMMs and associated workshops are therefore in themselves an important means of knowledge-sharing. As one of our TI-S interviewees commented, the prevailing ethos within TI is: "We are civil society so we argue about everything", an expression that the evaluation team can corroborate, although the debates tend to be of a very high quality. The AMMs are by no means a 'rubber stamp' process.

In 2002-2003, the role and status of the Individual Members (IMs) was reviewed by a committee appointed by the Board, and subsequently ratified by the AMM. Like the chapters, the IMs now go through an accreditation process every three years to assess whether they are still making a significant contribution to the movement.

The existence of the IMs system makes it possible to involve well-qualified individuals who may have wide experience in the anti-corruption field without necessarily being closely involved – or currently involved - with national chapters. For example, Huguette Labelle, the current chair of the TI Board, first became involved in the movement as an IM.

In other cases, IMs have long personal association with the movement, and therefore constitute an important part of its institutional memory and continuity. This is

no doubt an asset, though it can also be presented as the reverse – a mechanism whereby the 'same old people' continue to influence the development of the movement. One interviewee commented that certain countries might exercise a disproportionate influence in that they are represented both by OCRs and by closely associated IMs, a comment that the team considers valid.

There is a general consensus within TI that the chapters are the single most important 'ingredient' of the movement. The problems of corruption need to be addressed both globally in international forums and locally. However, many of the most important advances will come from national and regional groups, drawing on local sources of knowledge and support.

The chapters vary in the extent to which they have an international as distinct from more local outlook. However, as the movement matures the more effective chapters will wish to be more closely involved in the development of programmes in order to ensure that global and regional activities developed at the central level reflect their needs. They would prefer to have more structured opportunities to explain their needs before they are asked to assist in the implementation of activities. Particularly for chapters that have limited resources, the trade-off may be difficult: should they focus on local issues or be more involved in regional or global activities. In practice their choices may be driven by opportunistic factors, including financial considerations.

In addition to scaling up the capacity building efforts in chapters, the movement could further ensure that the active participation of chapters can influence policies as well as the strategic orientation of the movement. The AMM is a crucial opportunity to do so. The newly developed strategy is a good example on how dialogue within the movement can be fostered.

3.2   The Structure and Role of the Secretariat

In the course of the 1990s and early 2000s, TI-S expanded from an initial handful of people into a more structured organisation. In 2004, it was restructured in order to fulfil a scope of work defined as:

- Providing overall leadership of the movement's work at the international level, focusing on thematic programmes under global priorities and working with chapters.
- Coordinating the regional work, facilitating intra-regional support and inter-regional information exchange between chapters.
- Supporting the work of the chapters in particular in the four support areas of governance; fundraising; advocacy; and project management.
- Learning from and facilitating the sharing of initiatives, know-how and experience of chapters.
- Acting on behalf of the movement and the Board of Directors to help protect TI's reputation. This work includes monitoring and reviewing the National Chapters and managing the accreditation and review process, although final decisions on

accreditation are taken by the Board of Directors upon the advice of the Membership Accreditation Committee[5].

TI-S's current structure was developed as part of the Strategic Framework 2004 – 2007. This structure consists of three groups: the International Group (which includes the geographic desks of regional groups[6]), the Advocacy Group and the Resources Group, all reporting directly to the Managing Director. The Global Programmes department, created in 2004, reflected TI's newly defined global priorities and was initially in the International Group but now sits within the Advocacy Group.

Transparency International – Secretariat Organigramm
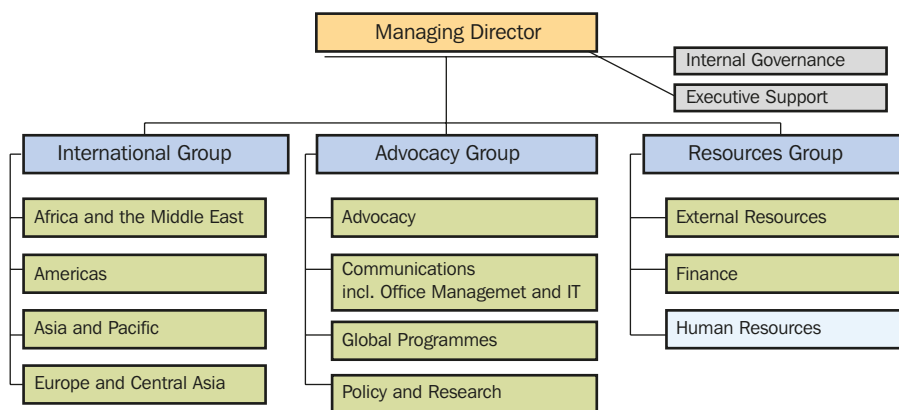
TI-S' budget grew from approximately €2.8 million in 2000[7] to €20 million in 2010. The average number of employees increased from 35 to approximately 120 people in the same period. The period from 2007 to 2010 represents the most rapid period of growth, with the budget more than doubling from €9 million to €20 million and the number of employees increasing from 66 to 120 people.

The single most important factor behind the recent expansion of TI-S has been the expansion of multi-country programmes that are coordinated by TI-S and involve more than one chapter. There are three broad rationales behind these programmes:

First, many of the problems that they address are intrinsically international. An example is the forestry programme, which involves the countries where timber is produced (e.g. Indonesia), the countries where it is processed (e.g. China) and the international markets where the finished products are solved (e.g. Western Europe).

Secondly, while adhering to the principle that chapters are responsible for their own core funding, the programmes provide a means of finding funds for the participating chapters – albeit on a project basis. The chapters' participation at the same time helps them build up knowledge and expertise.

Thirdly, some donors now prefer to channel their funding to TI at the central level, in the form of support for multi-country programmes, rather than to national chapters.

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5   TI Strategic Framework 2004
6   The regional groups are: the Americas, Europe and Central Asia, Middle East, Africa, Asia and Pacific. In the report they are referred to as "the regions".
7   USD 3.8 million, using current exchange rate.

TI-S is channelling most of the funds for multi-country programmes to national chapters. Examples include the European Union (EU), which is financing a major project on European National Integrity Systems (NIS); and the US Foundations that fund a number of multi-country programmes through TI-S.

TI-S is responsible to the donors that fund the projects, and therefore has a contractual relationship with the chapters that participate in these projects. TI-S staff stressed that participation was voluntary on the part of the chapters, but the projects nonetheless have changed the tone of their relationship from one which is more advisory to one which is more managerial. The team heard that the EU NIS project is particularly demanding because of the EU's administrative requirements, which in turn increases the administrative work that TI-S requires of the chapters. This may be inevitable, but has the unintended result of reinforcing the perception that TI-S behaves more like a master than a servant of the movement.

TI-S staff are at pains to stress that they form part of the 'Secretariat' and not the 'Headquarters' of the movement. Their point is that TI-S serves the movement, but does not direct it. The perspective from the chapters seems to be somewhat different. As will be seen in further chapters, many of the chapters struggle for funding, and some look at TI-S's much larger budgets with a degree of envy. Two executive directors – one from an OECD country and one from a developing country – made the comment in almost identical words that it would make an enormous difference if TI-S could fund just one extra staff member to help with their administration and development, a model found in some other NGOs. Chapters in some developed countries - that until recently had received support from their national aid agency - have observed that this donor has now changed its funding to TI-S which meant a loss of significant income which affected their in-country operations. In such (albeit limited number of) cases TI-S and Chapters could implicitly become competitors.

Relationships with the chapters vary quite widely according to the individual chapters' state of development, perceived needs and – no doubt - the personalities of the individuals involved. From TI-S's perspective, the smaller chapters that are struggling to establish themselves need more attention and effort, while many of the larger chapters – for example Bangladesh – function very effectively on their own.

The teams that coordinate the chapters are structured according to geographic divisions. The teams are often quite stretched, with individual members combining responsibility for liaison with particular countries with complementary roles in multi-country programmes[8]. Several chapters commented that the regional coordinators varied quite widely in their experience and knowledge of the regions they were supposed to be covering. In some cases, their comparative youth weakened their credibility when dealing with much more experienced chapter leaders.

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8   TI-S has explained that the APD differs from this pattern

3.3 National Chapters and Transparency International Secretariat (TI-S)

Chapters benefit from TI-S's knowledge and experience and the different products TI has developed since 1993. These include TI-S's work on international conventions, various tools and indices as well as regional specific programmes in combination with the organisation of regular meetings, annual conferences and other meetings, and these have underlined TI-S's essential catalytic role in sharing expertise and transmitting knowledge within the TI movement.

TI-S has been an important stimulus to chapter projects and programmes either drawing on experience elsewhere, for example in the case IPs, ALACs, NISs, or in response to chapter ideas that appeared crucial to the local context. The Guatemalan chapter benefited from support for the development of the national Access to Information Act as well as from support for the adaptation of the NIS. In Indonesia the chapter benefited from TI-S advice on procurement issues and notably the implementation of the Integrity Pact with the National Election Commission. TI-Bangladesh initiated a concept paper on youth and corruption which is likely to become a global TI programme.

The chapters vary widely according to their geographical location, size, access to funding, priorities, human resources, and legal set-up. This has led to different stages of maturity, including results and impact that can be contributed to TI-S, the chapters or both. With the supporting role of TI-S to the chapters, the uniqueness of each chapter has contributed to the diversity of TI. At the same time this diversity needs to be managed continuously safeguarding TI's brand and international reputation while at the same time continuing to respond to new and diverse challenges such as climate change and corruption or providing chapters with new learning tools. This has led TI to develop a more comprehensive strategy, including sustaining efforts to combat corruption globally while acknowledging regional and local differences.

The growth in diversity explains in part the growth of the Secretariat, the need for continuous funding that supports different components of the TI movement, including TI-S's needs and the chapters' access to direct funding for their own programmes.

TI-S support to chapters in a variety of roles remains crucial for the movement to gain more results: knowledge sharing; issue based research; diagnostic tools, studies and research, exchange of information, training and technical support. In addition, TI as a movement has inspired many others who have developed new niche areas in the fight against corruption and subsequently developed their own approaches and tools, at times with concrete results, for example, Global Integrity, Global Witness, Partnership for Transparency Fund, EITI and TIRI, just to name a few. With many of the newcomers TI has built important coalitions supplementing and strengthening its own diversity. Board members, IMs and other TI related persons serve on the Boards of these organisations. At the same time, many of these are in competition with TI for funding from donors.

TI-S's task of supporting national chapters, therefore is complicated by their diversity. The key variations in their condition include:

- *Access to funding.* Paradoxically (at first sight), many of the Northern chapters find it harder to raise funds, and therefore depend heavily on volunteers. By contrast, many of the larger chapters – for example Bangladesh (249 staff members, including 131 in the 'field base') and Indonesia (some 80 staff members, also including regional offices) – are in developing or middle income countries. These chapters are able to draw mainly on funding from development agencies. However, such funding is far less readily available in – for instance – Central Asia than in some other regions.

- *Internal governance.* Internal governance models vary quite widely in, for example, the extent to which chapters have individual members, who are often in a good position to assist chapters. In the period under review, TI-S has been working with the chapters with a view to making their governance structure more professional. The majority of chapters now have audited accounts, but the team understands that this procedure is not yet implemented among all chapters.

- *Political 'space'.* TI chapters arguably are most needed in the countries where CSOs have least freedom to operate. The extent or limits to this freedom naturally constrains the areas where they are able to work. For example, in Guatemala's or Venezuela's current political climate there are few opportunities for effective civil society advocacy on corruption issues at a national level. The local chapter has therefore focused on transparency in municipal governance, and is able to work in this arena with less risk of official intimidation. On a similar note, several chapters such as Russia and Niger suffer threats to their physical security, apparently emanating from local interest groups that feel threatened by their activities[9].

- *Focus.* The patterns of corruption – and therefore the requirements facing the chapters – vary considerably. For example, after the political change in 2003, the Georgian government cracked down very effectively on petty corruption, and TI-Georgia therefore focuses more on the need for greater transparency in the higher levels of government and aid programmes than on small-scale bribery.

One characteristic that the chapters have in common is a desire to protect their own independent room for manoeuvre. As one country chairman told us, with perhaps a slight touch of exaggeration, "The best thing about TI is that we can do what we like". Some of the chapters – for example Poder Ciudadano in Argentina - were founded before TI itself, and clearly would be able to maintain an independent existence without the wider movement. This sense of independence is also a consequence of the strength of personality that is required to work in this field.

At the same time there is a consensus amongst all respondents met in this evaluation on the benefits of belonging to the movement. One significant benefit is that the TI 'brand' makes it easier to gain international funding, especially in developing countries.

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9   On this point see the early January 2011 entry on TI's blog (http://blog.transparency.org) by Casey Kelso of TI-S.

Similarly, it is very clear for example that association with the international movement provides a degree of protection when dealing with authoritarian governments. This factor is likely to become more important if the movement becomes more assertive in – for example – its work on behalf of so-called whistle-blowers, in other words supporting the work of individuals that denounce corrupt practices that they have witnessed.

The Executive Director of one chapter summarised this by stating that there were many reasons for being part of TI but that the greatest benefit was the network. He cited as an example the fact that his chapter had learnt about Advocacy and Legal Advice Centres (ALACs) from a meeting in Azerbaijan, as well as the protection afforded nationally by being identified with a respected international NGO. He also described how a US Embassy list of the CSOs in the country that were most at risk had included the chapter, which had consequently been provided with enhanced security devices. These devices were nevertheless perceived to be much less effective in providing protection than the connection to a highly regarded international network.

3.4   Transparency International (TI) as a 'brand'

Both in TI-S and in the chapters, there is a general consensus that TI's single greatest asset is its international reputation or – as several people put it - its 'brand'. At the international level TI-S derives credibility and legitimacy from its claim to speak on behalf of some 90 chapters, as well as from the expertise generated in Berlin. Equally, the chapters derive credibility, legitimacy (and easier access to funds) from their claim to be part of a wider international movement. The reputation therefore is established on the premise of TI-S and the chapters working together as complementary elements of the movement.

However, developing and maintaining the relationship between TI-S and the chapters was said to be a task that requires a high degree of skill on both sides. The complexity of local realities, the intense workload of TI-S when dealing with global issues, and the sheer reach of the movement, mean that relations are occasionally strained. As a senior member of one of the chapters put it, the relationship is one of "creative tension" that naturally varies according to the strength and geographical background of the chapters, and according to their stage of development.

A central preoccupation within the preservation of the integrity of the movement has been a highly codified process of accreditation. Since 2003 TI has tightened its Membership Accreditation process to ensure that national chapters and Individual Members comply with TI's basic rules, and to exclude those that do not follow certain core principles. The process is highly demanding, and therefore time-consuming, but all have recognised its importance. As will be seen below, some chapter members expressed reservations about certain aspects of the process. The evaluation team however finds that the process is both essential for TI's integrity, and effective in ensuring a movement wide standard of integrity.

Nascent chapters applying for accreditation for the first time have to apply to the Board through the TI Membership Accreditation Committee (MAC). Existing chapters

must seek re-accreditation once every three years. The MAC is composed of two members of the Board of Directors, appointed by the Board (one of whom serves as Chair), and three representatives of the AMM who are elected by the AMM to serve three-year terms. Official Chapter Representatives (OCRs) and Individual Members (IMs) are eligible for election as AMM representatives.

The TI-S regional departments play an important role in helping national chapters work through the accreditation process, as well as in addressing governance problems that arise between re-accreditation applications. However, they are not represented on the MAC, and are not a formal part of the decision-making process. Despite this formal separation of roles, a TI-S staff member and – in a separate interview – a member of the one of the Northern chapters acknowledged that there could be an implicit conflict of interest. On the one hand the regional teams were 'on the side of' the chapters in helping them increase their capacity and thus meet the accreditation criteria. On the other hand, they were implicitly associated with the review process that was 'passing judgement' on the chapters. The evaluation concluded however that the capacity building-elements of the process are so central to it, and the criteria are independently verifiable, so that the potential conflict of interest is far outweighed by the cooperative elements of the process.

Chapters applying for accreditation or confirmation of accreditation start by filling in a detailed self-evaluation form, the most recent version of which was approved by the Board in 2009. This is divided into four sections: external perspectives (e.g. outcomes and impacts); internal perspectives (e.g. processes and management); learning and development (e.g. sharing knowledge and capacity building); and financial aspects.

Capacity building is visible in the wording of the self-evaluation forms, which reflect several of the key themes currently under discussion in the movement as a whole. For example, there is a particular emphasis on recording external impacts, in addition to the details of internal governance, and the form includes questions on paid advisory or professional services and the need to protect TI's name when undertaking such services.

Alongside the formal accreditation and reaccreditation process, TI-S provides advice and mediation in situations where chapters experience internal governance problems. In such cases TI-S may engage in a dialogue with key stakeholders including the local board of directors, staff, and donor agencies. The kinds of issues that have arisen relate to the political affiliation of members or to irregularities in financial management.

The process of self-evaluation begins six months before the formal MAC review, and several chapters have been challenged on gaps in their work. For example, the evaluation team heard that one Northern chapter was challenged on the extent to which it was focussing on corruption issues within the country as distinct from internationally. This observation is part of a wider trend within the Northern chapters. For example, TI-Deutschland initially started with a focus on international corruption but already in the 1990s decided that it needed at the same time to

look at domestic issues. TI-UK has recently sponsored a researcher to produce its first substantive report on corruption within the UK.

Over the years, TI has had to disaccredit a number of chapters (three chapters in 2006, four in 2007, two in 2008, one in 2009). With the support of the Board, TI-S has intervened to help address internal governance issues in a number of countries, including Bangladesh, Kenya, Uganda, South Africa, Philippines, Pakistan and Uruguay. Kenya and Bangladesh are examples of chapters that are now clearly successful, but might not have developed - or even survived - without the support of TI-S in addressing serious internal governance problems.

The concerns that were expressed were less about overall shape of the process and more about its application. For example, some chapters in developing countries suggested that there might be a North/South difference of view on what constituted a well-run chapter, and that some chapters in Africa might have been marked down too easily – for example if they seemed to centre around a single individual - whereas weak chapters in Europe were allowed to survive. Such concerns may owe more to perception than reality: developed country chapters are also facing stringent review processes. However, the need for confidentiality makes it difficult to discuss such concerns in public.

TI-S has in part responded to such criticisms by giving chapters a stronger role in peer-reviewing each other. For example, the evaluation team was given to understand that representatives of TI-Zambia and TI-Kenya were to go on a review trip to TI-Nigeria (after the chapter was recently suspended) instead of TI-S staff.

4. Relations with Donors

4.1 Maintaining Independence

The movement has gradually 'filled' its organisational model, in the sense that it has developed a well integrated network of chapters that work to well defined goals. However, this has not been followed by a stable resource flow, and the indications are that in future the main challenge will lie in the source, predictability and distribution of funding.

TI-S had set itself the objective of achieving 10% income growth per year, and managed to achieve this despite the global financial crisis. In the current year (2010) TI has reached a revenue of €20m. This alignment between goal and achievement is remarkable for a CSO.

TI-S total income
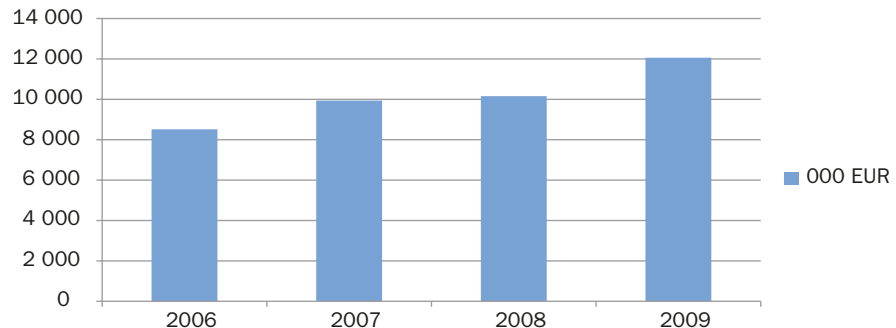
However, the income growth is largely due to a rise in restricted funds, primarily to multi-country programmes and a rise in income from bilateral donors such as DFID. The proportion of funding reserved for multi-country programmes in 2009 was approximately 20%.

TI-S has a relatively diverse basket of funders from government donor agencies, foundations and the private sector. Efforts of the past years to regain the original level of support from the US foundations have started to bear fruit, and the current extent of support from this source far exceeds earlier funding trends. This has given TI-S the opportunity to become more independent of the priorities of individual donors, while being aware of the very real risk of what it has labelled 'opportunistic growth', seeking money which was available for specific purposes, but not necessarily needed for the priorities that TI-S has itself defined.

There has been a decrease in the percentage of unrestricted funding from 40% in 2006 to 35% in 2009. TI-S' ambition of attracting new bilateral aid donors that traditionally give core funding has not been realised. Untypical bilateral donors that TI-S has considered approaching, such as Portugal, Iceland, Austria and Japan, only fund NGOs with bases in the respective countries. Bilateral donors in general provide very limited funding for the headquarters and secretariats of international NGOs (TI-S is actually one of the few International NGOs which does get funding from bilateral donors), and, in some quarters, the funding is not likely to grow.

Contributions 2009
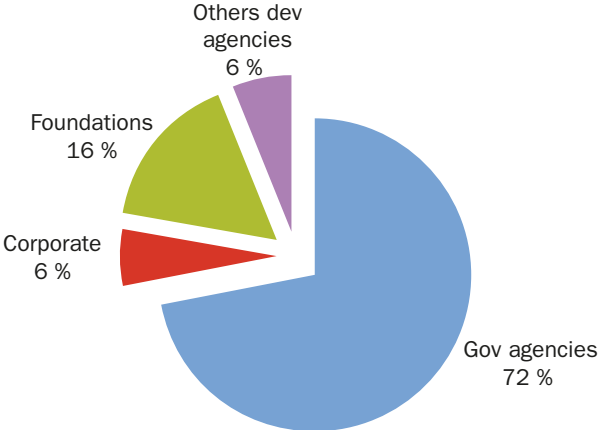
The level of funding from corporate and individual donors is relatively small. A number of banks and companies from the extractive industries contribute with smaller funds. However, the share of corporate funding is fluctuating and has fallen from a higher level in 2008 probably due to the financial crisis.

Percentage of Corporate Funding
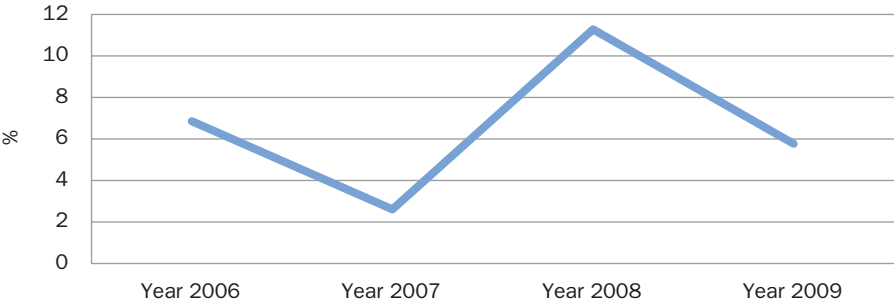
In general there has been a shift in donor funding from Asia and Latin America to Africa. Development programmes and embassies are being closed down in middle-income countries in Asia and Latin America, and there is a progressive shift to budget support. This is also reflected in the budget of TI-S where the lion's share of restricted funding goes to the Africa/Middle East department. The Europe/Central Asia department comes in second thanks to grants from the European Commission. There is less donor funding going to Asia/Pacific and the Americas depart-

ments, and this reduces the scope of TI-S support for TI work in these regions, a fact that is not aligned with the global nature of corruption, nor to certain worldwide trends such as the emergence of new regional economic powers in these regions.

Another avenue for diversification of income has proved controversial in the TI movement, namely the issue of whether TI-S should provide paid consultancy services. The 2010 AMM put on hold a proposal to set up a limited company (GmbH, in German legal terminology) that would allow TI-S to provide paid services and potentially generate important additional resources. Some chapters (for example TI-UK) have already provided such services, albeit on a limited basis. Others are reluctant. Their view is that TI should not 'sell' its tools and other services, as they are public goods, and they do not wish to compromise the movement's independence by being too closely associated with business. The evaluation concludes that while this may increase the ability of the movement to access more funding (and this is not a foregone conclusion) it could have implications on other aspects of TI's work, rendering it more complicated, for example through possible conflicts of interest, particularly if it were based in TI-S. The AMM concluded in fact that it was necessary to take more time to debate the implications.

In 2004 TI-S set up an endowment fund, and thus currently has a balance of €3.3m.[10] The fund was intended to make to TI-S more financially sustainable. However, it is not currently deemed to be of major importance for TI-S, partly because it is difficult for the secretariat to access the money, and also because low interest rates currently make this funding avenue less attractive.

Donor-inspired priorities of funding flows, such as priority support for developing countries by bilateral donors, and shifting funding channels away from NGOs to governments, reflect shifts in thinking on development effectiveness. This presents a stark contrast to the realities of the fight against corruption, which involves a wide range of different agencies across the world, and civil society continues to play the primary role. It is for example generally recognised that companies based in high-income countries help fuel corruption in developing countries. Similarly the growing stature of G20 countries, in particular the former G7 within that, and the 'BRIC' (Brazil, Russia, India, China) group, finds no echo in development cooperation strategies. This is illustrated in the table below:

Restricted funding to regional departments- 2009
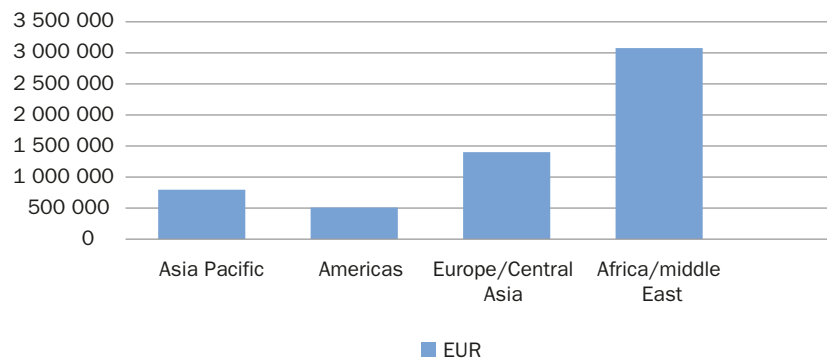
10   As of 31 December 2009

Some EC funds on the other hand operate in the EU only and is a source increasingly tapped into by TI-S.

Several interviewees suggested that TI chapters might in future be able to secure a larger amount of money from a larger membership base of individual supporters. However, there was no suggestion that this approach was likely to be applicable to TI-S in the near future and, even on the most optimistic projects, it would be unlikely to be feasible in more than a small minority of chapters for some time to come.

4.2   Effect of Funding Patterns on the Movement

The evaluation team examined the extent to which changing donor funding patterns have affected TI-S and chapter operations, with regard to results achieved. The hypothesis was that since it has become harder to secure 'core funding' and funding for specific regions and programmes, the influence of donors has extended, and that this has created certain imbalances that are not beneficial.

Donors and TI have so far not engaged in meaningful policy and monitoring dialogue that could have been mutually beneficial: donors would like to achieve their policy objectives, which TI - through its knowledge and capability – can help realize. There is no attempt to establish a recognisable common prioritisation of funding. The chapters have maintained a separate and country specific set of fundraising strategies with the donors, while there is no comprehensive donor policy on support to anti-corruption programmes that extends to Embassies and Cooperation representations. Project funding in general, premised as it is on quick wins, has not contributed to the sustainability and outreach of the movement.

As noted above (see section 3.2), the growth in multi-country programmes leads to higher transaction costs for the core TI-S staff, because of the cross-cutting responsibilities of Regional and Global Programme heads/staff. The Global Programmes department has not received any additional funding for the multi-country programmes, which crowds out other activities, as the amount of unrestricted funding has been constant. The effect on the independence of the chapters is limited as these programmes are concentrated in certain regions (for example Africa, where there is little alternative funding). However they have reinforced the role of TI-S as guarantor to the donors, rather than a facilitator and knowledge hub. This funding has provided TI-S with a more diverse funding base.

It has been difficult to generate funding for certain TI priorities. Large-scale TI-S proposals on Capacity Development for Chapters and Poverty and Development in 2009 have not been successful. In general very limited restricted funding goes to core functions such as internal governance and the communication department. The bulk of the tied funding goes to regional programmes (typically multi-country programmes).

It is also increasingly difficult for TI-S to secure funding to support Chapters in the North. Their main bilateral donors are under increased pressure internally to ensure their funds get spent in ODA countries. Norad has for example for the first time in

2009 made restrictions on their core funding to TI-S to be spent in ODA countries. This trend poses a potential risk for TI-S. When more of the core and unrestricted funding needs to be spent 'in the South', it is no longer technically unrestricted for the secretariat which makes it more difficult to support Chapters 'in the North' and undertake global work, including indices and tools and global communications work on behalf of the movement.

TI-S has managed to secure some restricted funding for both the policy and re-search department (44% of total cost came from restricted funding in 2009) and global programmes (77% of total cost came from restricted funding in 2009). There are however great variations within the departments: 75% of the total project costs for private sector initiatives and the *Global Corruption Report* are covered by restricted funding, and a large amount of funding has been earmarked to the Water Integrity Network. On the other hand donors have not been interested in funding TI priorities such as policy development, advocacy support, training of national chap-ters and TI-S initiatives aimed at innovating communisation and IT.

4.3   Influence of Funding on Chapters

One of TI's core principles has been that country chapters should be self-reliant and therefore responsible for their own fund-raising, whether from local sources or from international sources, including donors. The total amounts of funding for national chapters have risen over the years from €21 million in 2007 to €24.3 million in 2009.

The capacity and success of country chapters to attract such funding vary widely. In recent years the African region has attracted increased funding. The total amount to African Chapters has risen from €3.9 million in 2007 to €5.5 in 2009. Funding to the Americas on the other hand has fallen to €6.7 million in 2009 from the previous €8.1 million in 2007. The European region received €6.4 million in 2009 (€7.4 in 2008 and €5.1 in 2007). The funding to the Asian Pacific region has also risen to €5.7 million from €3.8 million in 2007. This is largely due to increased amounts to already rich chapters such as TI- Bangladesh and Indonesia.

In low-income countries (for example Ghana, Kenya, Bangladesh), chapters have had budgets large enough to run numerous projects and programmes and employ significant teams, including, in some cases, staff in provincial offices. However, they rely heavily on funding from bilateral development agencies and their income has fluctuated over the evaluation period. Most of the funding is tied to project support, and the chapters are also financially vulnerable and reliant on donor priorities.

Chapters in high-income countries have had great difficulty in attracting funding. The UK chapter stands out as an exception due in part to its corporate funding that makes up 20% of the total. Very few of the other chapters visited have managed to attract private sector funding apart from Georgia (9% of total funding) and the Netherlands (50% of a very limited budget).

The issue of private sector funding (which does not include public foundations) is controversial in the TI movement and some chapters have policies that prohibit

income from private sources. The case of Siemens illustrates that there are very diverse views on funding in the movement. In 2009 Siemens set up a $100 million fund to support civil society anti-bribery initiatives as part of a settlement with the World Bank to resolve allegations of corruption on Bank projects. TI-S has taken a policy decision not to apply for a share of these funds. Some chapters have taken a similar view, while others have indicated that they are interested in the possibility of Siemens funding. The main concern for TI-S was the management of the fund which TI believed should be managed independently from the company to ensure that the Initiative is administered strictly in line with its objective of addressing corruption, and not in the business interests of the company.

Income by Chapter
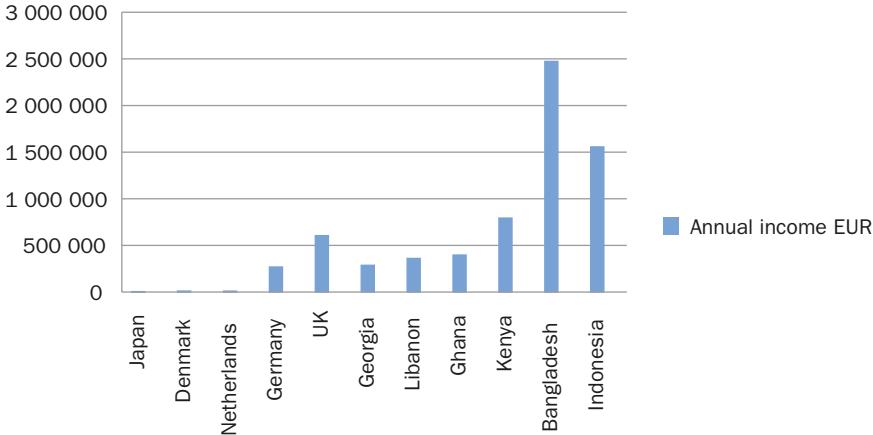
Chapter income is from the latest financial year available.

The UK chapter also stands out as a significant share of its funding has historically come from development aid funds (DFID), although this will change in the future as DFID is now allocating the bulk of its funding to TI-S. In addition the chapter has managed to carve out a niche for itself in Defence, and has hereby attracted funding from alternative sources such as NATO, as well as specific funding for the defence project from DFID

Some chapters in high-income countries function by relying on volunteers. The Danish chapter for example prefers this approach as a means of being independent of state funding. The chapter is therefore relatively inactive as it is primarily dependent on the time and resources of its Board members.

The German chapter has been highlighted as a success story in that it still has a very small office staff, but has managed to catch the attention of highly respected volunteers experts in fields such as law, development and the pharmaceutical industry who have been actively contributing to the work of the chapter through their participation in the 12 regional groups and 19 working groups on particular themes. The chapter is therefore in a position to offer authoritative analysis and policy recommendations on a relatively small budget (€268,900 in 2009). The

chapter's income includes contributions from corporate members, amounting to €101,900 in 2009, but these are limited to a maximum of €5,000 per firm in order to avoid any one company being seen to have too much influence. Corporate members are required to sign a statement of ethical commitment, including the implementation of a code of conduct and specific anti-corruption controls. Individuals pay €80 a year, and provided revenue of €62,800 in 2009.

TI-S has been assisting chapters with fund raising by giving training and technical advice, still with the ultimate objective of promoting self-reliance. As noted above, it has recently developed a new role in coordinating multi-country programmes which involve different chapters[11]. These programmes did not constitute a large share of chapter income in the low-income countries visited by the evaluation team (with the notable exception of Ghana where these programmes made up 37% of the total income in 2009). In high-income countries the NIS project did significantly boost the budget of the chapters visited (for example Japan) or will do so (for example the Netherlands and Denmark).

As noted above, the implementation of multi-country programmes gives TI-S something of a 'donor role' *vis-à-vis* the chapters and in that way alters the relation between the two. This has been the source of some tension in various chapters.

The 'natural' pattern of contacts between chapters varies quite widely. In East Africa and Latin America, a relatively strong sense of regional identity leads to a natural sense of community. In other cases, interviewees observed that they were more interested in contacts with countries sharing similar problems, often in widely dispersed geographies rather than among their immediate neighbours. Multi-country programmes serve to give a boost to such contacts.

Country chapters in developing countries are heavily dependent on donor priorities and operate to a very large extent on project funding, which limits their opportunities to plan their development against a given strategy, and hence to carry out and use country-based analysis efficiently. Most low-income country chapters are dependent on bilateral donors, and when bilateral donors disengage collectively e.g. as many did in Georgia (many agencies concentrate on low-income countries) it affect them inordinately. Most developed country chapters on the other hand are reliant on volunteers which – with the notable exception of Germany – has tended to limit the scope of their work. It is remarkable for example that the total staff of TI USA is three, severely constraining the ability of the organisation to address country issues that have a significant impact on the rest of the world.

4.4 Partnerships with Donors

There seems to be limited overarching coordination between development agencies and TI-S. TI-S's relationship with donors is largely restricted to the annual donor meetings, and a few frameworks developed by two donors, AusAID (the Australian official development wing) and DFID. DFID supports thematic issues (UNCAC, Aid Transparency), while the 5-year strategic partnership with AusAID in particular

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11   These include initiatives such as Transparency and Integrity in Service Delivery in Africa (TISDA), Africa Education Watch (AEW), Poverty and Corruption in Africa (PCA), Advocacy and Legal Advice Centres and National Integrity System Project.

includes on-going dialogue based on at least four face to face interactions and regular quarterly conference calls. This is supported with their participation at regional meetings (twice a year), and two visits from the regional director to Canberra, and systematic visits to AusAID country offices when TI-S staff are in the region.

However dialogue around reporting takes place mainly through discussions on points of detail. There have been efforts to develop a more strategic dialogue (donor meetings have take place since 2004), and the 2009 donors' meeting, where most of TI-S's bilateral donors participated, was perceived by both TI-S and the donors as useful and examples of systematic and fruitful engagement between TI-S and bilateral donors do exist such as the 5-year strategic relationship between TI-S and AusAID and dialogue with DFID on thematic issues (UNCAC, Aid Transparency).

In general TI-S however has limited and ad hoc engagement with development agencies. This contrasts with the desire amongst some bilateral departments (especially the Nordic donors) to devolve programming to umbrella groups through framework agreements that have lower degrees on specifications on specific results intended, but high requirements on the quality of needs analysis and performance reporting.

Most development agencies do not have the resources or structures for more regular interaction, especially when the responsibility for funding to TI-S rests with civil society departments where TI-S is just one among many organisations. Systematic collaboration is also made difficult by changing donor priorities and turnover of staff in both TI-S and donor agencies. Lastly TI-S suggested that there may be a lack of interest on the side of donors as well.

The result of this situation is that donors fall short of understanding the full breadth of the issues faced by TI, while failing to develop a more analytical and strategic alliance with a civil society organisation that is continually growing.

5. Efficiency and Effectiveness of Research

5.1 The Link between Research and Advocacy

TI-S serves as the guardian and coordinator of the movement's global research products, the various international surveys and indices, the annual *Global Corruption Report* and a series of position papers. This research serves to raise awareness of the problems associated with corruption and to that extent is highly relevant to TI's objectives. However, there is a debate within the movement as to how to make it more effective in the sense that it contributes directly to substantive reform.

Much of TI-S's work involves original research, but this is nonetheless not normally the kind of detailed primary research that might be conducted by a university department. The TI-S team also acts as a source of expert advice to the wider movement, for example by providing advice on conducting surveys. At the same time, many of the chapters carry out their own research, both in the form of surveys and other reports, and this work is often completely independent of TI-S.

A senior interviewee commented that he was both pleased and annoyed that in early 2010 the University of Pennsylvania's Think Tanks and Civil Societies Programme had cited TI as 'the second most influential think-tank in the world outside the US'. He was of course pleased that the organisation received credit, but annoyed because in his understanding TI is not primarily a think-tank. Instead, he thought that it should be seen as more of an activist organisation. One of its tasks is to produce evidence-based research. However, the purpose of this research is not simply to report on the current state of the world, but to change it.

Similar observations were voiced from both TI-S members and chapter representatives in the workshops that preceded the TI Annual Membership Meeting (AMM) and at the International Anti-corruption Conference (IACC) in Bangkok in November 2010. There is a danger that well-written reports may 'remain on the shelf'. Ideally, they should serve as targeted instruments for constructive change, but they often remain relatively specialised, dealing with issues that are important to the general population, but are not communicated in ways that allow a wider readership to understand the implications of the findings.

One reason for this apparent disconnect is the relatively technical nature of the knowledge involved. TI necessarily addresses different audiences. Reports on the finer points of legislation or contractual procedures are important for specialists, but may be less readily accessible to grassroots audiences. Efforts to harness TI's research in support of defined advocacy targets require a degree of specialisation.

A second reason relates to the accessibility, or lack of accessibility of information to particular social groups. For example, in Georgia the evaluation was able to verify the considerable divide that separates the university-educated groups that work in Tbilisi from the general countryside. This relates to the lack of Internet penetration, the poor quality of journalism, and the culture of rural society for whom corruption is mostly visible in its petty forms. These constraints are external to TI and are not amenable to influence by the movement. The fact that the limited capacity to mobilise citizen involvement is recognised from within the movement is a sign of health[12].

At a broader international level, TI-S is experimenting with the new social media as a means of sharing its message with a wider, global audience. Examples include the TI blog (http://blog.transparency.org) which was launched in 2009, and TI's Twitter account and Facebook page. Many of the chapters – for example TI Russia, TI Bangladesh and TI Slovenia - have set up their own Facebook pages. The various social media serve as a means of directing subscribers and participants to new developments, for example the launch of the latest surveys and indices on TI's main website, and this is itself due to be redesigned and re-launched in 2011. For the time being, these initiatives are accessible a relatively small media-literate elite. However, even in – or especially in – developing countries the percentage of the population with access to such media is growing. The challenges of reaching rural audiences in Georgia still remain. Nevertheless, this trend offers new, creative ways for TI to get its message across. Both TI-S and a selection of the chapters are seeking to make the most of these opportunities.

5.2 Knowledge Management Within the Movement

A related question concerns the spreading of ideas and techniques within the TI movement. In the chapters that we visited we heard a range of different views. For example, it was generally agreed that TI-S played a particularly helpful role in developing expertise on the various surveys and indices (see section 5.3 below), and in sharing this expertise with the chapters.

At the same time, the chapters clearly have an enormous amount to learn from each other. TI international and regional meetings promote face-to-face contacts and play an important formal and informal role in facilitating exchanges of ideas. TI-S has itself helped broker contacts between different chapters, for example a recent extended visit by a senior member of TI-Indonesia to Bangladesh.

Nevertheless, there is a question whether there could be more such exchanges, quite possibly independently of TI-S, a view that was expressed particularly strongly in Georgia. One obvious instrument is the TI Intranet, which is known as Chapter Zone. The general view of our respondents was that this had yet to reach its full potential. However, in the final stages of our evaluation we were shown the proto-type of a completely redesigned Chapter Zone which, in the light of a brief demon-stration, looks both more attractive and more user-friendly. The redesigned Chapter

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12   It is for example quoted in the TI Strategy 2015 as one of the most detrimental aspects of the work of the movement.

Zone will continue to be managed by TI-S but, if all goes well, will be fully adopted by the chapters, as though it were their own.

As with TI's external contacts, there is no single answer to the question how to improve internal communications and sharing of expertise 'horizontally' between chapters. Our overall assessment was that TI had been effective in this regard, but could do much more. The redesign is an important step in this direction.

5.3 Surveys and Indices

The Corruption Perceptions Index

TI's annual Corruption Perceptions Index (CPI), which is coordinated by TI-S, is one of TI's best known products. However, both inside the movement and beyond it, the evaluation found a general view that the Corruption Perceptions Index (CPI) was both a benefit for TI and something of a burden. When it first came out, it was highly relevant as a means of highlighting the problems associated with corruption. It still remains the product for which TI is most well-known and still gathers wide publicity. Nevertheless, its limitations are widely recognised.

The CPI was first launched by accident in 1995 when the German news magazine *Spiegel* obtained a draft copy of an experimental index developed by the economist Johann Graf Lambsdorff before it had been officially approved. Since then, the annual publication of the latest update attracts regular international attention. The most recent edition was published on 26 October 2010. By late November a Google search for 'Corruption Perceptions Index 2010' pointed to 167,000 items.

The CPI's appeal lies in its simplicity. Journalists – and apparently their readers – love international rankings. TI itself puts most emphasis on the country scores which range from one to ten (with ten representing the lowest levels of corruption). News reports tend to put most emphasis on the country rankings, almost as though the CPI were an international sports competition.

The wide publicity that the CPI attracts means that it has enormous value as an advocacy tool, and academic researchers on corruption have used it as a basis for a number of comparative studies. However, almost from the beginning, its methodology has been widely challenged.

TI has always been transparent about the limitations of the CPI's methodology. As the name suggests, it is an index of perceptions with no claim to 'measure' corruption. Moreover, it is based on – currently - 13 external data sources, not TI's own original research. Both these points tend to be neglected or ignored in much of the more shallow press reporting.

From the TI chapters' perspective there are several problems:
- First, many governments hold local chapters responsible for their countries' ratings even though the index is prepared by TI-S without any local input, and the chapters may not agree with the ratings. This has been a source of tension in – for example – Bangladesh where it seems that senior government figures do not accept the local chapter's explanation that it has no responsibility for its

country's CPI rating, and that TI-S itself is not responsible for the ratings produced by the external agencies on whose work the CPI is based.

- Secondly, although TI has been open about the basic methodology, the actual calculations have hitherto not been made public because some of the figures are based on proprietary information drawn from commercial organisations (the 2010 index is a marked improvement in that respect).
- Thirdly, the fact that each country has a single rating leaves no room for nuance. On a simplistic reading, the countries in northern Europe and elsewhere that perform well in the CPI have low levels of corruption, and therefore no real need for TI chapters and campaigns.
- Fourthly, there is often a 'perception lag' which means that countries may not win credit – at least in the short term – even for substantive improvements (the President of Indonesia reportedly has set his government the objective of matching Malaysia's CPI rating by 2015: he may be setting himself up for disappointment, on several grounds).

Despite these limitations – which are often expressed quite fiercely – the balance of opinion both in TI-S and the movement as a whole has been in favour of keeping the CPI. The status of the CPI is regular source of debate at Annual Membership Meetings (AMMs) but until now there has always been a majority in favour of keeping it. It seems that this is because there is no single alternative with the same power to capture the attention both of journalists and decision-makers. Rather than replace the CPI, TI-S has therefore sought to supplement it with other indices and assessments.

Bribe Payers Index

The first edition of the Bribe Payers Index (BPI) came out in 1999, and there have been subsequent editions in 2002, 2006 and 2008, with a further one due in 2011. The BPI seeks to complement the CPI in that it assesses the propensity of companies from the leading trading nations to pay bribes when doing business abroad. Unlike the CPI, the BPI is based on research directly commissioned by TI, and this means that it is significantly more expensive.

The 2008 BPI draws on surveys carried out by Gallup International and sponsored by NORAD in association with Ernst & Young and the German Federal Ministry for Economic Cooperation and Development (BMZ). It draws on 2,742 interviews with senior business executives in 26 countries and territories and ranks 22 countries according to the respondents' views of whether they are more or less likely to pay bribes. Belgium and Canada emerge as the countries whose companies are least likely to pay bribes, while companies from India, Mexico, China and Russia reportedly are most likely to do so.

The fact that the most recent BPI was published nearly two years before our evaluation meant that it was not uppermost in the minds of most of our interviewees. Nevertheless, it can be seen as a useful part of TI's portfolio, linking also to its campaigns on the OECD convention and business.

Global Corruption Barometer

The Global Corruption Barometer (GCB) is the third survey published by TI-S, and represents general public attitudes towards corruption. The first GCB appeared in 2003, and subsequent editions have appeared in 2004, 2005, 2006, 2007, and 2009. The next edition is due in late 2010.

The 2009 GCB was based on interviews with 73,132 people in 69 countries and territories between October 2008 and February 2009. Gallup International covered 50 countries, and TI commissioned other polling agencies for the remaining 19 countries. It assesses respondents' views of corruption levels in key public actors such as the police, politicians and business, as well as their own experience of petty bribery. Like the BPI it therefore provides a balance to the CPI by giving another perspective on corruption. However, it does not seem to figure so prominently within the minds of people within the movement, and at least until recently has attracted much less external publicity.

National Integrity System Assessments

The National Integrity Systems (NIS) assessment reports provide systematic, qualitative analysis of the principal institutions that contribute to integrity, transparency and accountability in a given country. The NIS reports complement TI's various surveys by providing a much more detailed analysis than the 'snapshots' provided by – for example – the CPI ratings.

The NIS methodology has evolved considerably in the course of the 2000s, and provides a good example of creative cooperation between TI-S and the national chapters. The original NIS concept was based on an approach developed by Jeremy Pope, TI-S's first Managing Director, in the 1990s and summarised in his 2000 publication *Confronting Corruption: the Elements of a National Integrity System*. The first generation of NIS reports on individual countries in the early 2000s were typically produced by individual authors commissioned by TI-S, often with limited involvement from the national chapters.

By contrast the current approach provides for much closer, team-based collaboration between TI-S and the national chapters. TI-S designs and explains the methodology. Teams within the national chapters conduct the necessary research in response questionnaires developed by TI-S, and discuss the results in some detail. At best, this sharing of expertise is a significant contribution to the local chapter's capacity building. The NIS research process typically also includes a consultative approach with other key anti-corruption actors in government civil society and business.

TI-S has also helped coordinate funding for recent multi-country NIS projects, and thus to make a financial contribution to the chapters. Lebanon's *National Integrity System Study*, which was published in 2009, is an example. The study was part of the regional MABDA (Measuring Anti-Corruption Efforts and Building Demand for National Integrity Systems in Egypt and the Arab World) project, which also involves Egypt, Palestine and Morocco. The Lebanese researchers working on the study report challenging but ultimately highly productive debates concerning methodology.

A second stage of the MABDA project involves a 'gap analysis' of the legal and institutional reforms needed to fulfil the requirements of UNCAC in the four countries. Overall, the project appears to be a positive and productive example of TI-S and regional sharing of expertise.

TI-S is currently coordinating a European regional NIS project sponsored by the EU and, as noted above, this is one of the most important multi-country programmes currently under way.

Surveys by the National Chapters

Several national chapters have produced their own surveys. An example is TI-Indonesia (TI-I) which is currently working on its fourth Indonesian Corruption Perceptions Index (CPI). According to the current TI-I survey specialist, his team benefited from considerable technical advice from the TI-S research team when preparing the third CPI. They now feel that they have sufficient experience to carry out the fourth CPI with limited external input, but appreciate the fact that TI-S advice is available when needed.

Several other chapters have undertaken their own surveys and, as noted above, these include the TI-Kenya's *East Africa Bribery Index*. We understand that it conducted this survey without technical assistance from TI-S.

The CRINIS Survey Tool on Political Financing

CRINIS ('ray of light' in Latin) is a survey tool designed to assess levels of transparency and accountability in political financing. The methodology combines qualitative and quantitative assessment techniques, and was first developed in eight Latin American countries in 2006. In 2008 TI used the same methodology to coordinate surveys of political financing in Bangladesh, Indonesia and Nepal. The project is therefore an example of inter-regional intellectual 'technology transfer' via TI-S.

Overall Assessment

One donor interviewee expressed disappointment that TI had been unable to develop a single instrument which encapsulates the current state of research on corruption in the same way as the CPI did in the 1990s. He observed that the National Integrity System assessments are much more thorough, but often come across as highly technical, and this limits their effectiveness as advocacy tools. The national and regional surveys produced by TI chapters are useful tools (they are for example used for national anti-corruption programming by governments, civil society and Development Partners) but the fact that they use different methodologies makes it hard to draw out international comparisons and lessons, although these surveys may have considerable impact at the local level.

The evaluation concludes that the search for a single indicator or instrument is illusory in any case. Research since 1995 has highlighted the complexities of international corruption as much as its common features. The CPI rankings, and to a lesser extent other TI indices, are now one of the most frequently quoted in country profiles and in interviews with governments. They provide a useful starting point to promote deeper analysis, or closer engagement with government and other

actors. The evaluation team itself found it very easy to obtain meetings with government transparency focal points in the different countries visited, and this is in part due to the status that the indices have given TI. It is therefore understandable that TI has kept the CPI alongside its other portfolio of indices and surveys, as the one that has the most impact in raising awareness of transparency issues.

5.4 International Anti-Bribery Conventions

TI aspires to help create a rule-based world in which the principles of transparency and anti-corruption are accepted as universal norms. The various international anti-bribery conventions arguably are important steps in this direction because they offer the prospect of a common set of global standards, and they therefore provide a natural focus for TI advocacy campaigns.

Both the OECD Anti-bribery Convention (1997), the UN Convention against Corruption (UNCAC, 2003) and to a lesser extent the various regional conventions were regarded as major breakthroughs when they were signed[13]. TI – represented both by TI-S and the national chapters – has played a significant role in lobbying governments to draft and sign the conventions. However, these were only the first steps. The more difficult long-term task has been to advocate that governments put them into effect through concrete reforms and, where necessary, contribute to the prosecution of offenders.

TI's approach to the conventions has been to work at both the international and the national levels: this creates an opportunity and a need for close cooperation between TI-S and the chapters. This has been broadly effective. TI-S operates at the global level, while the chapters lobby their respective governments. Neither can be wholly effective without the other.

TI's dilemmas arise from the slow pace of implementation of the conventions. This slowness is in part to be expected because of the difficulties of building international consensus. Nevertheless, there is a risk that it will engender cynicism among supporters of the fight against corruption both about the role of the conventions as effective international instruments, and even about the anti-bribery agenda more broadly.

The extent of TI's success in the Anti-Bribery Conventions is not easily assessed, as it is only one contributor to the broad process of change. Clearly, it cannot claim ultimate success – or anything approaching it – while implementation remains so slow and uneven. Nevertheless, the evaluation concludes that progress would have been even slower without the awareness campaigns that helped prepare the ground for the conventions, and the continuing lobbying afterwards.

The OECD Anti-bribery Convention
The OECD convention has to date been signed by 38 countries, including all OECD member states and a handful of non-member states such as Brazil and South Africa. Signatories adopt similar principles the US Foreign Corrupt Practices Act

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13   For a helpful summary of the various international conventions, including the regional ones, see www.transparency.org/global_priorities/international_conventions .

(FCPA, 1977) in that they undertake to introduce laws making it a criminal offence to bribe foreign officials in order to "obtain or retain business or other improper advantage in the conduct of international business". The extent to which the convention is or is not implemented therefore links directly to TI's work with the private sector.

Since the early 2000s the OECD has operated a peer review mechanism which is now entering its third phase. Phase 1 reviewed member states' laws to ensure that the met the standards of the convention. In Phase 2 joint teams representing the OECD Secretariat and two member states visited each country to review the implementation of the laws. Phase 3, which started in 2010 with the US and Finland, is a further review of implementation. Reports summarising each country's assessment in the reviews are published on the OECD website.

One of TI's most distinctive contributions has been to publish an annual *Progress Report on the Implementation of the Convention*. This is a joint project between the TI-S and the chapters: the Secretariat prepares a detailed questionnaire which is completed by subject experts within each country. TI-S then collates and publishes their findings. The annual review process, which started in 2005, has helped prompt the national chapters to ask more pointed questions of their own governments, and to build up their own expertise.

The *Progress Report* is the most authoritative and accessible source on the topic available anywhere. In June 2010 the OECD Working Group on Bribery for the first time published its own set of data on enforcement of the Convention, but this is much less detailed. National governments rarely publish the required information in an accessible format. It therefore provides an essential source for international benchmarking, and for advocacy by the chapters.

The overall findings of the *Progress Report* show that enforcement of the convention is very uneven. Only seven countries demonstrate 'active enforcement' as measured by the number of legal cases brought against corporate and individual offenders in proportion to the size of their economies. These are Denmark, Germany, Italy, Norway, Switzerland, the UK and the US. A further nine qualify for 'moderate enforcement' status, while the remainder show evidence of 'little or no enforcement'.

TI-S analysis provides the international perspective but, at the national level, the main responsibility for advocacy falls on the national chapters. When OECD Working Group delegations visit member states for their Phase 2 and now Phase 3 reviews, they typically make contact with local TI representatives. However, the most important contributions of the local chapters lie in raising awareness on the problems of foreign bribery in their own societies – including in their business communities – and in lobbying their governments

After the US, Germany is the most active enforcer of laws against foreign bribery and TI-Deutschland can claim a degree of credit for helping raise awareness of the problems associated with international corruption, and thus creating the conditions

for more active enforcement in accordance with Germany's obligations under the terms of the convention.

TI-UK has played an even more significant role. Until recently, the UK had a poor enforcement record, in part because its anti-bribery laws were out of date, and came in for sharp criticism in the OECD's Phase 2 and follow-up reports. For more than a decade, TI-UK lobbied for legal reform and in April 2010, the outgoing Labour government passed the UK Bribery Act into law. The government's briefing documents explaining the need for the new law referred repeatedly to TI, and TI-UK can claim considerable credit for the fact that it was eventually passed. In October 2010 TI-UK received an award from *Third Sector*, a magazine for not-for-profit organisations, for its work in lobbying for the Act. This was primarily TI-UK's achievement, but it no doubt benefited from being part of a wider movement.

Since the OECD represents all the leading industrialised trading nations, the Convention remains one of the best hopes of creating a legal consensus on the transnational 'supply' side of corruption. At the same time, it is also necessary to recognise that the OECD's status as a 'club' of industrialised states is both a strength and a weakness. It is a strength because it is easier to reach a degree of consensus both on the principles of the convention and on an enforcement mechanism among a relatively small group of states with many features in common and a degree of common interest. It is a weakness because the OECD does not include India, China, Russia or the other developing and transition economies.

The United Nations Convention Against Corruption
In principle the United Nations Convention Against Corruption (UNCAC) could provide part of the answer. UNCAC was initiated in 2003 and came into force in 2005. To date 140 states have signed the convention though several – notably including Germany – have yet to ratify it. UNCAC therefore goes beyond the OECD convention by offering the hope of a truly global anti-corruption framework.

UNCAC is broader than the OECD Convention in that it covers private-to-private bribery (where both the bribe-giver and the bribe-taker belong to the private sector) in addition to bribery of officials. It places a strong emphasis on strengthening government institutions to prevent corruption. It also includes a framework to promote international cooperation asset recovery, for example when government officials have transferred stolen funds to foreign bank accounts. If all its signatories implemented all its provisions to the full, a major part of TI's global aspirations would be accomplished

Inevitably, however, the implementation process is slow and arduous. The task of coordinating the follow-up to UNCAC falls to the United Nations Office on Drugs and Crime (UNODC), which coordinates intermittent Conferences of State Parties to discuss progress. To date meetings have taken place in Amman (Jordan, 2006), Nusa Dua (Indonesia, 2008) and Doha (Qatar, 2009). All three meetings have witnessed the jockeying and delaying tactics that is all too characteristic of high-level diplomatic conferences.

As with the OECD convention TI's work on UNCAC takes place at two levels. At the international level, TI-S has worked together with other NGOs to press for tighter UNCAC implementation procedures at Conferences of State parties. For example, in 2009 TI together with the International Chamber of Commerce, the UN Global Compact and the World Economic Forum (WEF) coordinated a joint letter by CEOs to UN Secretary-General Ban Ki Moon calling for a properly funded UNCAC review mechanism. TI – specifically TI-S - is the leading NGO in the UNCAC Coalition (www. uncaccoalition.org) which claims more than 200 NGO members.

At the Doha meeting, the Conference duly agreed to institute a review mechanism. However, the outcome is significantly weaker than TI and other NGOs had hoped in that several key aspects of the review process, including the participation or otherwise of civil society, are voluntary rather than mandatory. Participating governments undertake to publish only a summary of the review, not the full report.

At the national level TI has been working – again in many cases in collaboration with other civil society organisations – to persuade national governments first to sign and ratify the convention, and then to implement it effectively. One example is the MABDA (Measuring Anti-Corruption Efforts and Building Demand for National Integrity Systems in Egypt and the Arab World) project in the Middle East where the first stage has been the writing of a set of National Integrity System (NIS) reports for Lebanon, Palestine, Egypt and Morocco (see section 5.3 above – Surveys and Indices). The second step is to follow up the NIS reports by producing an UNCAC gap analysis showing what governments need to do to implement the convention properly.

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For the future, the question that TI-S and individual chapters face is not so much whether to engage with UNCAC and the other conventions, but how much energy and resources they should devote to these activities. The question touches on the 'double identity' that lies at the heart of many of TI's dilemmas. The task first of evaluating the extent to which governments comply with UNCAC and then of pursuing reforms is often highly technical, and results come slowly at best. These technicalities scarcely provide a popular rallying cry, and are therefore of limited value in raising public awareness of the need to combat corruption.

A specialist on Middle East civil society from outside the movement puts this ambivalence into perspective. He pointed out that civil society movements in Lebanon had much more 'space' in which to operate, compared with their counterparts in other more monolithic and authoritarian states in the Middle East. When asked what openings existed for engaging with such states on anti-corruption

issues, he came up with one word: UNCAC. The fact that governments have made commitments - however cynically - under UNCAC and other conventions means that they can be held accountable. TI-S and the national chapters have been correct to pursue this opening. Working on UNCAC should not be their only activity, but it is certainly an effective one.

6. Anti-Corruption Tools and Programmes

6.1 Integrity Pacts

The Integrity Pact (IP) is a tool aimed at preventing corruption in public contracting. The concept was first developed in the 1990s. The experience of individual chapters varies, but IPs are now widely advocated throughout the movement, and can be considered to be one of TI's 'flagship' tools.

The IP consists of a process that includes an agreement between a government or a government department (at the federal, national or local level) and all bidders for a public contract. Signatories undertake not to pay, offer, demand or accept bribes, or to collude with competitors to obtain the contract, or to engage in such abuses while carrying out the contract. The IP also introduces a monitoring system that provides for independent oversight and accountability.

Although the basic IP concept can be quickly summarised, there are many variations in its implementation. One of TI-S's most important tasks is to collate and disseminate this knowledge. For example, in 2010 it published the pilot version of *Integrity Pacts in the Water Sector. An Implementation Guide for Governments Officials* in association with the Water Integrity Network. The Guide draws on case studies from across the movement, notably Mexico and Germany.

The publication serves as a positive example of TI-S's role in drawing on the movement's experience, but even greater results could be achieved. This is in large part a question of capacity. Very few persons have the necessary expertise.

A range of examples illustrate the variations in how the implementation is done:
- In Germany TI has coordinated the IP for the expansion of Berlin's Schönefeld Airport. TI-Deutschland first approached the German authorities to propose an Integrity Pact for the airport in 1995, but the proposal was dismissed on the ground that doing so would be to admit that corruption was a problem. In 2001, following repeated allegations of corruption, all project agreements reached by that time were cancelled. Flughafen-Berlin-Schönefeld (FBS), the company responsible for managing the airport, eventually approached TI-Deutschland to ask for advice. This resulted in the formal establishment of an IP, including the appointment of an expert independent monitor, in early 2005. The project is still under way. TI-Deutschland is currently involved in three other IPs.
- Transparencia Mexico is heavily involved in IPs, to the extent that the organisation now has 87 volunteers working on IPs. Other Mexican CSOs now play a role in implementation and monitoring IPs. The result is that IPs are now considered

a 'public good' and – a significant outcome – are now clearly established as a standard tool in Mexico. The IPs are labour-intensive, however, forcing the chapter to decline offers to work on other IPs and rather scale up the efforts with other coalition partners. The next challenge in Mexico is to address the sustainability of IPs over time and design a systemic approach to IPs with the development of software that also includes quality control.

- The first IP project for Transparency International India involved the state-owned Oil and Natural Gas Corporation (ONGC) in 2005. In 2006 the government's Central Vigilance Commission (CVC), which is the chief anti-corruption organisation for state-owned agencies, took up the IP concept, drawing on TI's model, and in 2007 recommended its adoption in all major procurements. However, TI India found that the independent monitors have more of a "dealing with complaints" role rather than a monitor with an active preventative engagement during the procurement process. As a result, TI India is engaging in additional/complementary monitoring activities.

The conclusion is that IPs have been effective in promoting integrity in large projects, while the diversified approaches have allowed the implementation to remain highly adapted to local conditions, and efficient.

6.2   Impact of Integrity Pacts

When TI first developed the IP concept in the 1990s, IPs were known as 'Islands of Integrity'. The name conveyed the idea that it should be possible to establish safe havens, even within a sea of corruption. However, now as well as then, the question remains how to spread integrity principles more widely, turning 'islands' into 'continents'.

Again, different chapters have had different experiences. In Mexico, as noted above, IPs have in effect become a public good and had an effect on the level of corruption in specific projects. The concept is put into practice by other CSOs, with Transparencia Mexicana's understanding. In India on the other hand, TI India had to become more closely involved because of the poor performance of state-appointed monitors.

Interviews carried out in Indonesia point to a broader set of concerns. The IP concept had proved a valuable tool, for example in relation to post-Tsunami reconstruction. However, the term 'integrity pact' had to some degree been devalued from its use in government-sponsored programmes to mean – in effect – 'integrity pledge': companies and government agencies would promise good behaviour without being subjected to any form of monitoring.

TI Indonesia also pointed to a still broader problem: IPs were useful but, by their nature, were 'one-offs' related to individual projects. The broader challenge was how to bring integrity principles into the national, regional and local planning process. In short, to use a quote heard by the evaluation team, IPs were one step on 'a very long road'.

The IPs can therefore best be described as a significant contribution in a specific area of TI-S work while other, additional interventions are needed to prevent and reduce corruption in the procurement area.

6.3 Private Sector Anti-Bribery Programmes

Engagement with the private sector has been central to TI's mission from the beginning. It is impossible to tackle public sector corruption without simultaneously addressing the interrelated problems of private sector bribery. Well-drafted laws are important, and more transparent government procurement procedures are essential, but there is at the same time a clear need to engage with the companies themselves.

The TI-S private sector team has taken on two roles. First, it serves as a source of expertise within the movement, notably by developing a set of anti-corruption tools for business, and by advising national chapters on their own programmes when called upon. Secondly, the TI-S team works 'horizontally' with other international business and civil society organisations. In this area, TI – and specifically TI-S – can claim a high degree of effectiveness in establishing a broad international consensus on the principles of private sector anti-bribery controls.

Business Principles for Countering Bribery

Significant achievements include the *Business Principles for Countering Bribery* which were first developed in 2003 and explain the key principles that should be included in corporate codes as well as showing how they should be put into practice.

The Principles were first published in 2003, and the current edition dates from 2009. They explain the key anti-corruption principles that should be included in corporate codes, as well as explaining how they should be put into practice. For example, there are sections on human resources, communications and auditing. The latest edition has been slightly revised to included expanded clauses on joint ventures and consortia.

The Principles are in themselves an example of TI's collaborative approach in that the original project was a joint initiative together with Social Accountability International (SAI – www.sai-intl.org). The steering committee included representatives of leading international companies as well as trade unions and other NGOs

The Principles have been translated into at least nine languages, ranging from Arabic to Indonesian and Turkish. TI has also produced a *Guidance Document* on implementation of the Principles, a *TI six-step Implementation Process*, a *Self-evaluation Tool* an *Anti-bribery Checklist* for CEOs and an *SME Edition* of the Principles.

The current projects of the TI-S private sector team include the development of a draft *Framework for Voluntary Independent Assurance.* This is now going through a period of public consultation, and should be launched in early 2011. The theme of assurance – proving that corporate anti-corruption programmes have actually been

implemented rather than existing solely on paper – is likely to grow in importance in coming years.

TI-S's Private Sector Coalition Partners on Private Sector Standards
As discussed above TI-S's particular contributions in the private sector include the development of the TI Business Principles for Countering Bribery and a set of associated tools. TI has always adopted a collaborative approach to the Business Principles and, as will be outlined below, it has worked successfully with other international organisations to establish a broad consensus on private sector stand-ards. As with international anti-bribery laws, the challenge is no longer about defining principles, but rather about putting them into practice.

The World Economic Forum's Partnering Against Corruption Initiative (PACI)
The World Economic Forum (WEF) is best known for its annual meetings of corpo-rate leaders in Davos. In 2004 it established a Partnering Against Corruption Initiative (PACI). This is a collective anti-corruption initiative that was launched by CEOs from the engineering & construction, energy and metals and mining indus-tries, and has since been broadened to include representatives of other sectors. PACI's strategy is to build up a broad coalition of leading CEOs who can then use their influence to raise standards in their respective industries.

Jermyn Brooks, in his then capacity as TI's Director of Private Sector Programmes, was one of the founders of PACI, and TI-S Managing Director Cobus de Swardt is a member of the current PACI board. PACI members work to a common set of *PACI Principles for Countering Bribery*. These are closely modelled on TI's Business Principles: the main difference is that TI takes a stronger line on 'facilitation pay-ments' (small payments to speed up routine government transactions to which the payer is entitled).

TI has issued a series of joint publications together with PACI as well as the UN Global Compact and the International Chamber of Commerce (see below). These include a joint statement on *The Business Case Against Corruption* (2008) as well *Resisting Extortion and Solicitation in International Transactions* (2010), which is training tool to help company employees develop strategies to stand up against demands for bribes.

UN Global Compact
The UN Global Compact was set up by then UN Secretary General Kofi Annan in 1999 to promote closer contacts between the UN and business. Companies signing the compact undertook to abide by an original set of nine principles on human rights, labour and the environment. Some 5,300 companies worldwide have signed up to the Compact, and they are required to submit an annual self-assessment known as the Communication on Progress (COP) showing how they have put the principles into practice.

In 2004 the Compact adopted as its 10th principle the statement that: "Busi-nesses should work against corruption in all its forms, including extortion and bribery". TI took an active part in the discussions leading up to the adoption of the

10th principle (Annan made the flattering suggestion that it ought to be called the 'Peter Principle' to reflect the lobbying endeavours of TI founder Peter Eigen).

TI's more recent contributions to the Compact include *Reporting Guidance on the 10th Principle Against Corruption*(2010), a joint report explaining in detail how companies should report on corruption in their annual COPs.

The International Chamber of Commerce
The International Chamber of Commerce (ICC) is a 'business NGO' with an international network headquartered in Paris. The ICC produced the first edition of its *Rules of Conduct to Combat Extortion and Bribery* in 1977, and published revised versions in 1996 and 2005. As noted above, the ICC has issued a series of joint publications with TI. It also works with TI on, for example, lobbying for the effective implementation of the UN Convention Against Corruption .

FTSE4Good
The portfolio of the UK-based index company FTSE includes FTSE4Good an index that measures companies' performance in meeting specified corporate responsibility criteria. The index can be used as a basis for socially responsible investment (SRI) decisions

In 2006 FTSE4Good launched a set of anti-corruption criteria that companies had to meet in order to retain their place on the index. The criteria were based on TI's Business Principles and developed in consultation with TI. Their significance is that they introduce an additional positive incentive – the ability to attract SRI funds – to encourage companies to introduce high anti-corruption standards.

Other TI-S Contributions to Knowledge on Private Sector Corruption
In 2009 TI released its first Transparency in Reporting on Anti-Corruption (TRAC) report which assesses the extent to which some 500 listed companies have publicly reported on their anti-corruption policies and strategies.

Also in 2009, TI's annual *Global Corruption Report* published a special edition on 'corruption and the private sector', with specialist contributions on – for example – business integrity systems, and the dynamics of different kinds of business corruption.

Selected Sectoral Initiatives
TI *Strategic Framework 2008-2010*, notes the need to devote special attention to "vulnerable business sectors, such as the extractive industries, the defence and the construction sector". Each of these sectors is characterised by large budgets and high levels of government involvement, and both of these factors increase the risks of corruption. The extent to which TI can help find solutions – on its own or in coalition with other partners – is therefore an important test of its private sector credibility. The following analysis focuses on construction and defence (for a review of TI's work in the extractive sector see section 7.5)

Construction and Infrastructure
In 2003 TI-UK set up a programme focussing on the international construction and engineering industry, and this was subsequently co-funded by TI-S. The Secretariat and TI-UK then worked together on the development of a TI programme focussing on construction. This led in 2005 to the founding of an industry Anti-corruption Forum in the UK, a collective initiative which, despite its generic name, works primarily in infrastructure, construction and engineering.

The achievements of the TI-UK/TI-S programme included the drafting of a series of tools for managing corruption risks in construction projects. However, in 2008 TI-UK and TI-S decided that they were unable to provide further funding. The two founders of the project, have now moved on to set up a Global Infrastructure Anti-Corruption Centre (GIACC) independently of TI. TI-UK is still an institutional member of the Anti-Corruption Forum. The tools developed by the programme are still available on the TI-UK and TI-S websites

The TI Construction and Infrastructure project drew considerable credibility from the personal experience of its principals, who had worked in the industry for decades before they joined the movement. The fact that they are now working elsewhere is a loss to TI given the current needs of the private sector are not so much for anti-corruption principles, which are now well-established, but rather for advice on implementation of those principles, backed by sectoral expertise.

Defence
TI's Defence Initiative was initiated by TI-UK, rather than TI-S. Both in Berlin and in other chapters it was mentioned several times as a successful example of a specialist programme started by a national chapter that nevertheless has implications for the movement as a whole.

The Initiative benefits from a small core team whose members have between them worked at a high level in both business and the armed services. A recent series of international scandals has made clear to leading defence companies that they need to take the anti-corruption agenda seriously. TI-UK has been able to gain a significant degree of trust within the industry and to develop policy proposals that could well have an important impact on the way that the defence sector operates in future.

The international nature of the defence sector means that effective engagement likewise has to take place with companies and governments in several different countries, not just in the UK. This in turn means that TI's UK-based defence specialists have to liaise with TI chapters in these countries, who may lack the same degree of expertise either in the defence sector or the private sector more generally. This coordination requires a high degree of tact

The Chapters' Engagement with the Private Sector
Despite TI-S's lead, the chapters' level of engagement with the private sector has been very uneven. Here two factors come into play. The first is personal: the degree to which chapter leaders themselves have private sector experience and connec-

tions. The second, related factor is the extent to which they identify the private sector as a priority in their countries. Some chapters have a strong tradition of engagement with the private sector: others have tended either to neglect it, or to view it with suspicion.

TI-UK has long had close associations both with the private sector and, even more than most other chapters, has a history of close liaison with TI-S. For example, one of its members was one of the founders of TI, and has served on the boards both of TI-UK and of the global movement. He chaired the steering committee that worked on the 2003 draft of the TI *Business Principles.* TI-UK has a corporate supporters' forum, which meets for regular briefing sessions on anti-bribery developments, and is a significant source of funds for the chapter.

By contrast, the founders and a significant proportion of the current board of TI Japan come from academia, and have found it much harder to establish meaningful engagement with business. This is in part because Japanese companies in any case have less experience of engaging with civil society compared to their European and North American counterparts.

The Lebanese Transparency Association (LTA – TI's chapter in Lebanon) has benefited from a Board with strong corporate connections: many of its members have worked in senior business or consultancy posts both in Lebanon and internationally. In 2002 the LTA helped set up the Lebanese Corporate Governance Task Force Starting in the early 2000s, and it has since brought out a series of publications on the wider topic of corporate governance. Current initiatives in this direction include plans to establish an Institute of Directors to provide professional training for board members.

It was only in 2008 that the LTA launched the Lebanon Anti-Bribery Network (LABN) in partnership with the Washington-based Centre for International Private Enterprise (CIPE). Recent activities include a survey of companies' experiences with administrative corruption and a training guide – '*You are being audited*' – on how to resist demands from public officials. The fact that Lebanon was under Syrian occupation until 2005 is cited as one of the reasons why it was only relatively recently that the chapter felt able to tackle the more sensitive topic of bribery.

The LTA has in the past received advice from TI-S on private sector matters, but at present CIPE appears to be its main international source of inspiration – an illustration of the point that national chapters seek expertise from a variety of sources, not just from within the movement.

Elsewhere the extent to which chapters engage or do not engage with the private sector depends in part on a local assessment of priorities. In Tbilisi, for example, TI-Georgia has taken the view that government transparency and accountability – or the lack of them – are the most pressing issues. So far the chapter has found it hard to identify local private sector partners with whom to work, in part because companies do not want to be seen to be criticising the government – even implicitly - although it hopes to do so in future.

Similarly, TI-Indonesia (TI-I) has engaged with the private sector on, for example, integrity pacts for government procurement. However, until now, this engagement appears to be more a by-product of activities related to public sector corruption than a programme in its own right. One former senior TI-I member noted that Indonesian civil society activists tended to be suspicious of the private sector in general. TI-I has a tradition of engagement with both government and business but – particularly on the private sector side - this does not always come naturally or smoothly.

This ambivalence was further illustrated in an internal survey designed to assist the development of *Transparency International Strategy 2015* when respondents from TI-S and the national chapters were asked to select the priorities that would be most important for the movement to focus on in the next five years. The private sector came well down the list with only 18% identifying it as an important issue, although of course it will be impossible to address the third-most popular topic – public contracting (cited by 36%) – without involving companies. Similarly, only 18% of respondents thought that 'strengthening private sector work' was among the particularly important capacities that the movement needed to develop in the next five years.

A similar ambivalence arises in the ongoing internal debate about paid services and consultancy. Ever since TI published the *Business Principles* – and even before – TI has encountered requests from companies for help in implementing anti-corruption best practice. Historically, TI has resisted such requests, arguing first that it lacks the resources and secondly that entering into consultancies would compromise its independence.

Despite these concerns, TI-UK has recently established a small, self-funded social enterprise, provisionally known as Transparency Incorporated, which is to provide training and advisory services on a fee-paying basis. Transparency Incorporated is a separate legal entity from TI-UK, which retains its charitable status. It is recruiting a team of specialists, mostly part-time consultants.

TI-UK's initiative is in part a response to specifically UK circumstances. British companies' need for advice has become all the more urgent following the passing into law of the Bribery Act, which introduces a new corporate offence of 'corporate failure to prevent bribery' unless companies can demonstrate that they have 'adequate procedures' to prevent malpractice.

However, the UK initiative also highlights a wider issue: anti-corruption principles are well established, in large part thanks to TI. The task of implementation now requires detailed work by specialists working inside companies. TI has to work out how - in its capacity as a civil society movement – it can best contribute. Should this be from the inside or the outside?

On a related but slightly separate issue, TI chapters now find themselves competing with commercial consultancies for aid agency contracts. In one recent example, one of TI's FSU chapters lost out to an international consultancy firm in an aid

agency tender to set up a legal advice centre. On its own, the chapter was unable to compete. It would have had a much stronger chance if TI-S had had a consultancy arm with whom it could have worked.

TI's uneven engagement with the private sector points to a broader issue pervading the work of the chapters and of TI-S: the need for a more consistent needs analysis to ensure that priorities are not neglected, and that a careful debate takes place as to the merits of intervening in one area or another. While the movement is highly pragmatic in its approach to specific situations, and very broad in its definition of its field of intervention, it needs to develop strategy formulation tools to ensure that its collective view of corruption is truly holistic.

7.   Coalition-Building and Advocacy

7.1   Efficiency of Coordination and Advocacy

From the outset, the TI movement has placed a strong emphasis on coalition-building both within the movement and beyond it. There have been three main motives for this strategy. The first is pragmatic: there are limits to what a single organisation can achieve on its own, and this is particularly evident now because of the levels of specialist expertise required to tackle specific aspects of corruption, for example in procurement. The second and more important point is that corruption is a complex problem, involving a wide range of different actors. By the same token, solutions need to involve an equally wide range of actors from government, business and civil society. Thirdly, corruption frequently overlaps with other issues such as human rights, forestry, climate change, and administrative reform. TI cannot be a specialist in these areas, but equally it may be able to make a distinctive and important contribution to the corruption aspects of these problems.

However, the coalition-building approach has required TI to ask tough questions concerning its own role:

- If TI wants to work with – for example – government policy-makers from the 'inside', how far can it at the same time align itself with other groups taking a more confrontational approach from the 'outside'? Is it sufficiently relevant to be an actor of persuasion, using contacts and advice to achieve change?
- How far should TI – and specifically TI-S - try to take a leadership role, or to retain ownership of the movements that it helps to create? Are the tools and strategies that it has helped create 'public goods', or should it try to retain some form of 'copyright'? This relates to the questions on sustainability in the ToR.

7.2   Effectiveness of Advocacy and Legal Advice Centres

The emergence of TI's network of Advocacy and Legal Advice Centres (ALACs) has been one of the most significant developments within the movement in the 2000s. The expansion of the ALACs is widely seen as a major opportunity, and serves as an important illustration of the role played by TI-S, but also illustrates many of the dilemmas facing the movement.

The first TI Advocacy and Legal Advice Centres (ALACs) were set up in 2003 in Bosnia & Herzegovina, Macedonia and Romania with the help of a German Federal Foreign Office grant. The basic concept is that ALACs are primarily referral centres where individuals with corruption concerns are advised and guided to the appropriate public investigative body. They are not set up to carry out actual investigations of cases.

Some 39 TI chapters now manage ALACs in their respective countries, and there have been more than 70,000 citizens' contacts. Some chapters have decided not to take up the ALACs approach: for example TI-Indonesia took the view that the country was already well-served by an existing network of citizens' advice centres. However, the number is still increasing, and TI-S thinks that as many as 65 chapters may have ALACs in the near future.

TI-S helped facilitate the original grant application to the German Foreign Office, and – following the somewhat unexpected success of the original three countries' ALACs – has helped make the concept better known within the movement.

In 2005 TI-S commissioned an external evaluation to assess how far the ALACs concept would be replicable elsewhere in eastern Europe and further afield[14]. In 2006 TI-S organised a 'Replication Workshop' in Azerbaijan where representatives from some 15 chapters learnt at first hand how the local ALACs functioned, and were able to assess how far the concept would be applicable to their own countries. Among other outcomes, this workshop inspired the Guatemala chapter to set up its own ALAC Since then, TI-S has facilitated a number of study visits between chapters, and these are greatly valued by the participants. A number of similar exchange visits visits now also take place completely independently of TI-S.

In 2008 TI-S published a *Start-up Manual* on ALACs. The Introduction to the manual emphasised that it offered an "approach" rather than a "blueprint" because the ALAC operating mechanisms would vary significantly according to the structure of the respective TI chapters' structure. TI-S thinks that the adaptability of the ALAC concept is one is one of the main reasons for its rapid spread. For example, Azerbaijan has set up a system of mobile ALACS to visit remote mountain areas. The Secretariat has offered advice, but has not tried to 'micro-manage' the various ALACs: it would not be either appropriate or feasible to do so.

A major reason for the ALACs' popularity is that chapters feel that they bring them closer to ordinary citizens. This evaluation shares the view that ALACs have great potential in terms of linking TI as a movement closer to local citizens and as such the potential to trigger civic activism against corruption.

The ALACs have helped TI build coalitions with government and citizens. In South-Eastern Europe, Memoranda of Understanding were signed with government agencies in relation to ALACs, and ALACs were used as entry points to gain influence on policy and legal reforms.

According to TI-S, most of the ALACs around the world have positive relations with relevant government bodies. Agreements have also been signed for example with other rights-based NGOs in Kenya. However, the concept of ALAC is rather new in most places in Africa and evidence from chapter visits show that it may be difficult to build coalitions with government Anti-Corruption Commissions in some countries (e.g. Kenya, Ghana, Uganda). One explanation given by anti-corruption commissions

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14   See www.transparency.org/global_priorities/other_thematic_issues/alacs/information

is that the TI mandate in relation to handling concrete allegations of corruption is still unclear.

The 2005 evaluation of South-Eastern Europe ALACs mentioned above pointed to the centres as important coalition builders in relation to both citizens and governments. The vast majority of government representatives cited in the evaluation stated that ALACs have played a vital role in increasing public awareness of citizens' rights in relation to corruption. ALACs enhance the outreach to ordinary citizens and they raise public awareness on citizens' rights related to corruption issues in a way that is catalysing civic activism. The external evaluation from 2005 emphasised the degree of empowerment that the legal advice has provided to so many ordinary citizens. In the vast majority of cases, ALAC does not act directly on behalf of its clients but provides information enabling them to take their own actions and that this truly is one of the "hidden" impacts of the ALACs.

In South-Eastern Europe ALACs helped TI build a substantial public constituency, which changed the image from that of an organisation that had been seen as largely academic or research-oriented. ALACs do however risk raising public expectations that cannot be fulfilled. TI chapters are expected by the public to handle individual cases, and some chapters fear that there is a risk of disappointment when they just refer them to other institutions.

The evaluation concludes that ALACs have great potential in terms of linking TI as a movement closer to local citizens and as such the potential to track civic activism against corruption. There are also examples of how data collected by ALACs has provided the basis for policy reforms. Full effectiveness, in the use of ALAC information for evidence based advocacy at global level, has however not yet been achieved, due to the lack of advanced centrally linked database. The ALACs are however a very cost-effective TI tool (individual cases are handled for under €50 a fraction of what private legal advice would cost[15]) and ALACs are playing an increasingly vital role in drawing attention to citizen's rights with respect to corruption. The ALAC could therefore be an important stepping stone for TI in becoming a more citizens-oriented movement.

7.3 Complementarity of Advocacy and Legal Advice Centres

Coalition-building entails many risks for an issue-based organisation, in particular the tension that this might entail in relation to advocacy work. The evaluation initially questioned whether TI's policy of eschewing investigations into specific cases and individuals was still being upheld in the light of the expansion of the ALACs.

The initial evaluation hypothesis was that such an initiative had to some extent eroded the movement's 'non-investigations' policy' and the 'non-threatening' approach of TI. However, the visits to countries with ALAC centres did not provided any evidence to support this view. TI as a movement still upholds it's 'non-investigations' policy'.

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15 See the external evaluation from 2005

Case study chapters have substantiated that TI as a movement is still safeguarding the principle of "non-investigation" and "no naming and shaming", although there appears to be some diverging views within the movement. The Bangladesh chapter for example decided against having ALAC-style complaint desks on the ground that this would be against the "non-investigation of individual cases" principle.

Nevertheless, the line between investigations and legal advice is thin, and the top management at TI-S has indicated an increasing willingness to become involved in publicising cases after hearings have begun in court, even if forensic investigations are still not undertaken. Individual cases are examined by ALACs in order to decide whether there is legal corruption case and in order to guide on referral. This has implications with regard to both data and personnel security as ALAC staff potentially have access to confidential and sensitive information that may expose them to personally harassment and danger, and this is a type of information that needs to be kept in secure databases.

TI as a movement does not publicise cases that are not already followed up in the public domain. In practice TI chapters collaborate actively with the media (for example by providing training in journalistic skills in Georgia) and provide it with information. The 2008 report on Revenue Transparency of oil and gas companies is also the first time that TI-S has named individual companies for low performance.

The spread of organised crime in certain areas of the world (for example in Guatemala) has raised particular issues in terms of reducing the risk that TI's role can create for staff. Even though the information generated from ALAC is kept in confidential databases, challenges in relation to data protection and security are increasing.

TI-S offers support to chapters in cases of harassment and an internal TI SAFE committee has been established to help develop a security protocol, support chapters and design a long term strategy. This is still of limited use because of the difficulty of putting the mechanism into practice in the context of varying the conditions on the ground. Of greater value to the chapters is the image of TI as a widely recognised organisation, and the publicity (and possibly international investigations), which would automatically be generated by an incident against a volunteer or a member of staff. TI-S can also effectively represent the movement and call upon governments that have harassed or imprisoned TI chapter staff.

Until now TI-S has only had a rudimentary database for ALAC data management. However, this shortcoming is being addressed and a system of centrally connected databases have been designed that are supposed to provide an improved case management process, a clearer M&E system and better data security. A global tracking mechanism has also been created in 2008 to measure the ALAC effectiveness at translating information from individual cases into systemic anti-corruption change.

7.4 Effectiveness in the Aid Agenda

TI-S and the chapters, given their status of civil society organisations, have had some impact on reducing corruption in aid transactions. While evidence collected during country visits shows that generally limited visibility is given to the issue of corruption in contracts and grants relating to aid organisations, some of the evidence points to the fact that this could be very large. The multi-country programmes have also contributed to enhancing aid effectiveness by focusing on reducing leakages in funds to social sectors such as water, health and education.

TI has been involved in the discussion on development aid and corruption since its inception and TI-S has built some effective relationships at the international level such as with the OECD, the OECD-DAC committee and the U4 anti-corruption resource centre in Bergen. In addition, TI is engaged in a number of civil society coalitions, such as the Publish What You Fund campaign (www.publishwhatyoufund. org). TI has also engaged with the World Bank to discuss its governance and anti-corruption program as well as its operational policies.

Some of TI's Individual Members, Advisory Council members and TI-S staff have been exposed to corruption and development in their respective careers at multi-lateral and bilateral organisations and have direct experience with this issue. Their influence at key international events as well as their continued exposure to these organisations has proven to be valuable in ascertaining that relevant policies and mechanisms are developed on both sides: the providers of aid (loans as well as grants) as well as the receivers and beneficiaries.

TI published a handbook on preventing corruption in humanitarian operations in 2010. It compiles best practices from the field, including ways to track resources, confront extortion and prevent aid diversion. TI is also on the steering committee of the International Aid Transparency Initiative which aims to assist in accessing information to aid easily and in the case of TI provide opportunities to track governments 'aid receipts and expenditure. TI has developed various alliances such as with Global Financial Integrity, the International Budget Partnership and Revenue Watch Institute with which it launched the Revenue Watch Index in 2010.

Only some chapters in developing countries have used these opportunities to play a catalytic role in the area of development aid and corruption[16], although TI as a movement has put this important topic on the international agenda. Chapters that have done so include Peru which has an important anti-poverty project and Bangladesh, which is playing a role in the Climate Trust Fund.

It appears that that involvement has been mainly focussed on corruption in massive disasters such as the Tsunami or conflicts such as the incidents in Georgia following operations in South Ossetia. Georgia has in fact been an important exception in this area, although the chapter, by its own admission, pulled back from a full advocacy campaign. There is a need to understand the political economy and governance

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16   Procurement is an obvious area but also, for example, having the opportunity to check investment budgets against results; social auditing, asset registration of politicians etc.

environment of developing countries, in particular how networks of power relations, political parties, ethnicity, religion and powerful actors in the private sector interact.

For example, development partners have used 'drivers of change' analysis and other 'power and change' instruments to gain a better understanding of the exact nature of the context and challenges[17]. It is a missed opportunity that the majority of chapters in developing countries have not used their credibility as representatives of the movement to contribute to such analysis, thereby strengthening the demand for accountability and transparency and building coalitions with key stakeholders in country.

Such activities could provide the movement with strong visibility at local and regional level and would have allowed chapters to make a contribution based on their knowledge of their own societies. A variety of instruments could have been used very effectively (Integrity Pacts; Tool Kit, National Integrity Systems, etc); it would have provided opportunities for learning and finally provided chapters with funding opportunities. Development aid will remain and many development partners appear determined to support civil society in its efforts to hold governments accountable.

7.5 Effectiveness in Promoting Reform in the Extractive Industries

TI – as represented both by TI-S and individual chapters - has taken a prominent part in civil society and multi-stakeholder coalitions working to combat corruption in the extractive industries (oil, gas and mining). The questions that arise are not so much whether this work is worthwhile, or whether TI's contribution has been useful, but rather whether it could have done more.

In the late 1990s, the UK-based campaign group Global Witness called on companies to 'Publish What You Pay' to governments. Global Witness's original research into the role of natural resources in funding conflict in, among other countries, Angola led to the establishment of the Publish What You Pay (PWYP) NGO coalition. TI – both in the UK and in other countries – has played an important part in the coalition.

At the Johannesburg Earth Summit in 2002, the British Prime Minister Tony Blair picked up on the PWYP campaign, and this led directly to the starting of the Extractive Industries Transparency Initiative (EITI) in 2003 which involves governments, companies and NGOs in a multi-stakeholder process to ensure that companies are able – and required – to report their contributions to government revenue according to an agreed set of common procedures. The EITI Secretariat was originally based in the DFID office in London and is now in Oslo.

EITI's links with TI include the fact that Peter Eigen, TI's founding chairman, is now the chairman of EITI, and TI is one of the participating NGOs. As EITI's name suggests, it is an important case study in how to put the principles of transparency into practice, and to that extent it can be considered a vindication of TI principles.

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17   Drivers of Change was developed by the Department of International Development, UK, and is a way of understanding the political
      economy of change and poverty reduction in developing countries.

TI's further contributions to the revenue transparency field include the publication of a *Report on Revenue Transparency of Oil and Gas Companies* in 2008, and the joint publication with the Revenue Watch Institute of the 2010 *Revenue Watch Index*, which rates countries according to the information that they disclose on the oil, gas and mining industries, including revenue payments, contracts and regulations. Meanwhile, the PWYP campaign has continued in parallel with EITI. In 2010 it claimed a significant success with the passing of the Dodd-Frank Wall Street Reform and Consumer Protection Act in the US which requires US-listed companies of all nationalities to publish what they pay in revenue to US and foreign governments.

Despite these successes, the question arises whether TI could have done more. Indeed, could or should it have managed the EITI secretariat itself rather than leaving this task to others? Within TI-S, the consensus answer is a qualified 'no'. TI does not need to 'own' the global movement for transparency. If other organisations follow shared objectives in their own specialist niches, then that is all to the greater public good.

8. Managing Change

8.1 Organisational Development

This evaluation posed the question of whether TI-S's organisational development (described in sections 3.1 & 3.2) has kept up with its growth, and whether growth and resources have allowed it to maintain a good degree of effectiveness and efficiency in the fight against corruption. The evaluation concludes that the answer is positive, and that this is due mostly to two factors: the increasingly skilful use of the chapter-secretariat linkages, and the improvement in the management systems in the Secretariat. At the same time the evaluation notes that the connections to the chapters are still challenging.

Interviews with staff both at TI-S and chapters indicate that although much progress has been made in developing the management systems of TI-S and in its links to the chapters, a lack of resources at certain levels of management has meant that not all goals have been met. Results from the TI 2015 Survey reflect that this feeling is shared across the movement, at least in relation to the issue of chapter capacity building.[18]

The shortage of middle management level personnel can be examined within the context of the International Group. The core issue that emerges from multiple interviews with personnel, IMs and volunteers, is that of resources – in other words the benefits and salaries that are offered by TI. The high calibre of personnel required for anti-corruption work is not matched by the resources available to retain appropriate personnel. The net consequence is relatively significant turnover at the middle levels of management, and the overstretch of personnel that can engage authoritatively with partners and particularly the chapters. For example; at TI-S the evaluation confirms the widespread conviction that the Regional Managers do not have enough time to focus both on the stronger and weaker chapters in a region, and as a result, the stronger chapters were the ones who missed out on support.

The negative effect of this lack of resources on the delivery of results can be seen in the concrete limitations that affect performance. These limitations are more than those of an overextended organisation, and in fact reduce its efficiency.

For example, the fact that the same personnel are responsible for both accreditation and capacity development would need to be addressed. Whereas trust and personal relations are important in creating an effective partnership, distance and a

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18   TI Survey 2015 – 59% overall felt that the capacity of chapters is becoming stronger and chapter capacity building received the highest number of votes (41% overall) for areas to focus on over the next 5 years.

critical eye are important for the accreditation process. Another example is to be found in the difficulty in engaging in greater depth in the local political economy. The chapters interviewed in general valued the efforts of the Regional Departments but in some cases felt that more specific knowledge, both technical and local, would add more value. During discussions at TI-S a person raised the point that there is a need to have more technical experts in the Regional Departments to design locally relevant tools and research areas. Others feel that it would not be beneficial to try to keep this expertise in regional departments. In this line of thinking, espoused by the management of TI-S, the proper approach is to ensure that a wide range of technical expertise can found throughout the secretariat and more importantly throughout the movement. One of the key roles of the secretariat is to identify where best practices and expertise lie within and outside the movement and bring these swiftly to the chapters as and when they need it.

Movement-wide strategies have been a central tool of coordination for TI-S, and provide another illustration of the negative effect of lack of resources. The consultative nature of the strategy definition process is much more developed than it is in many global CSOs, where the Secretariat plays a much more directive role, and it has been improving over time. The first strategy was drawn up by the Secretariat in 2003 to cover the period 2004-08. It was approved by the Board, but not passed at the AMM and hence was perceived to have a lack of ownership by the movement. The strategy for the period 2008-10 was developed in 2007 and was mainly an update and extension of previous strategy. It focused on joint-working within the movement but was deemed to be unsuccessful because of a failure to mobilise resources quickly enough to fulfil its objectives.

The present strategy (which has not yet been implemented because it was only approved in November 2010), has been through a much more thorough process of debate, including a widening circulation of the document, culminating with a movement-wide discussion in Bangkok in 2010. The process has included a task force nominated by the chapters, and it has been described as 'belonging to them'. Such stronger ownership makes TI-S's task more challenging. Expectations are high that the determinations will be followed through. If this is to happen TI will require increased resources (€500,000 has been ring-fenced for its implementation), and TI-S will be responsible for a large part of the implementation.

8.2 Financial and Personnel Management

The organisation has consistently fulfilled its statutory financial reporting requirements, and from 2008 started reporting to the International Financial Reporting Standards on a voluntary basis[19]. Steps to improve internal financial management from 2004 onwards include standardising budgeting and invoicing procedures across departments, systematic cash-flow accounting, the use of accounting software, and tracking the state of individual programme finances.

Examples of cross-departmental cooperation to strengthen internal procedures include the contract database created by the Finance Department and the External

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19 TI Annual Report 2008

Resources Department and the creation of a fundraising proposal clearing entity[20]. The External Resources Department is also responsible for checking proposals for financial viability and quality before they are submitted.

As mentioned in section 3.2, TI-S grew from 35 to approximately 120 people over the evaluation period, with the most rapid growth taking place between 2007 and 2010. Recruitment, staff training, development and performance assessment have consistently appeared as issues to address in the organisation's work and implementation plans. Measures taken over time to tackle these challenges included the introduction of a new recruitment policy and a staff training needs assessment in 2003, collecting staff feedback for management in 2004 and the introduction of mid-year reviews in 2009. While progress has been made, TI itself acknowledges the 'retention of highly qualified staff' as a significant challenge [21].

No. of Staff
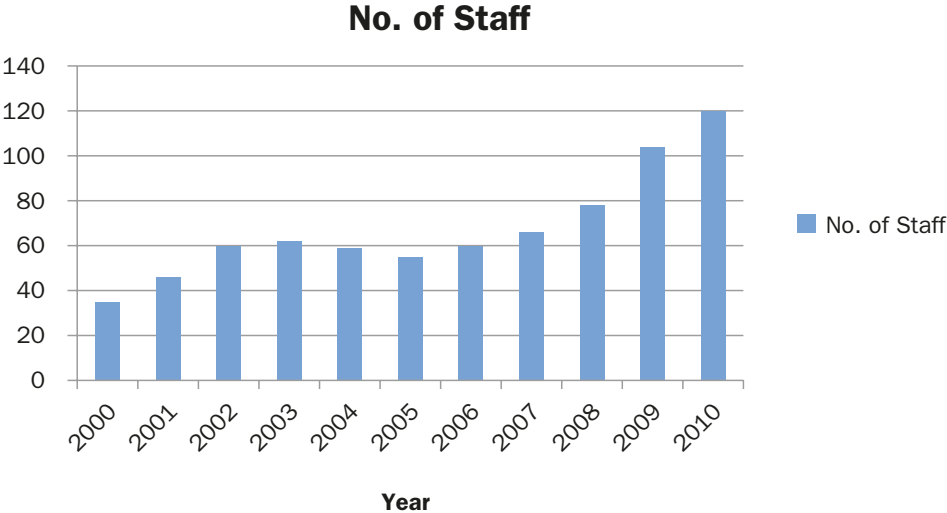
The rapid growth in the period 2007-10 was driven by the increase in project funding for multi-country programmes. In the corresponding period, the core structure and processes of the organisation did not develop proportionately. This was partly attributed to the fact that senior personnel, who would have otherwise been responsible for strengthening core capacities and processes, were driving the creation and implementation of the multi-country programmes.

Funding shortages have in fact been one of the most direct constraints in efficiently addressing the personnel challenge. The People Development Strategy 2010, a well thought-through initiative would have done so, but had to be dropped because of a lack of funding.

It was acknowledged in interviews that the stress placed on TI-S due to the growth of the multi-country programmes had been underestimated. This growth led to the need for more personnel with project management and implementation skills than were available. The ongoing progress of these programmes shows that the organi-

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20   Implementation Plan 2009
21   See for example Implementation Plan 2008

sation has dealt with these personnel challenges for the time being, but longer-term work force planning would leave it better prepared for changes in the future.

8.3 Devolution from Transparency International Secretariat (TI-S)

Recently there has been consideration within TI-S to creating permanent offices in specific regions of the world, located in regional hubs. This is seen as a possible solution to the need for detailed grasp of the issues, pooling the expertise and time available to the chapters. The question whether there should be such devolution from TI-S to the regions came up at several points in our interviews both in TI-S and in the chapters, and is a distinct opportunity to manage change in the field of anti-corruption as well as the relative success of the TI model. At first sight devolution, as this is called, would facilitate inter-chapter coordination, and it might lead to greater understanding at the central level of specific regional problems.

From the point of view of the chapters, the appreciation can differ widely. One factor is the degree to which chapters share common problems with their immediate neighbours, or rather whether a more versatile cooperation would not be justified on an issue per issue basis. For example, TI-Kenya has recently coordinated an East Africa Bribery Index, an indication that it does see value in addressing shared problems at a regional level reflecting similar internal country issues. On the other hand, TI-Georgia has found that the Baltic region offers many more opportunities for cross-learning than the immediate Caucasus neighbours, partly because the Baltic has been able to overcome the issues faced in the Caucasus. Similarly the Guatemala chapter has found cooperation more advantageous with the Dominican Republic, or Colombia, than with its immediate Central American neighbours.

Many of the most fruitful exchanges can be even more highly eclectic. The example of the Guatemalan chapter's learning about ALACs via Azerbaijan (with the facilitation of TI-S) was mentioned. On a similar note, a TI-Japan interviewee cited a fruitful exchange with TI-UK on the transparency implications of government retirees entering the private sector. In TI-S a member of the Asia team saw the benefits of being based in the region, but at the same time referred to the benefits of being able to consult a thematic specialist 'across the corridor' in Berlin.

However, there are already examples of TI-S devolution:
- One of the most important is the TI-EU liaison office which is based in Brussels, separately from TI-Belgium, and was set up in 2008 and now has 2 full-time, 2 part-time and 1 short-term staff member. This is reflected in the growth of regional officers based in TI chapters in countries such as Guatemala, aimed at covering a region
- The TI-S private sector team, which is located in the Global Programmes department, presents a slightly different model from a purely geographic one in that it is highly dispersed: the current head of the team is based in Berlin but other key team members work from the UK, Canada and elsewhere in Germany. This arrangement is perhaps more the result of personal circumstances than of design, but it shows that, with the help of modern communications, a degree of devolution in TI-S activities is entirely feasible.

- A third variation is TI's Defence Against Corruption programme which is based in TI-UK in London and currently funded by DFID but serves as a source of expertise for the entire movement.

One future possibility under consideration is that multi-country programmes may be coordinated from regional bases. For example, there has been some discussion about the possibility of basing the Forestry Programme in Bogor, Indonesia. More generally, however, the exploration of such options demonstrates the ability of the movement, and TI-S, to increasingly fill the niche that it has identified, while at the same time stumbling significantly on the problem of resources. This could be linked to the issue or country based assessments and the results come out of these. Given the flexibility of TI it would be important to create 'hubs' programme or issue based depending on demand and efficiency concerns.

8.4 Monitoring and Evaluation

TI-S has moved from an activity-based implementation plan to an objective based implementation plan in 2009, which introduced a greater degree of outcome reporting. An Monitoring and Evaluation (M&E) working group has been set-up to develop a new monitoring system. Strategic objectives are held in the 5-year global strategy, arranged around strategic priorities and areas of focus. In recent years TI-S has organised its reporting against these objectives, in narrative form, while each programme has largely been left to develop its own planning and M&E systems.

The evaluation posed the question of how far TI - and TI-S specifically – has been able to demonstrate impact. An external evaluation of TI from 2001 noted that there was no regular and systematic procedure for gathering the successes of chapter work and disseminating it to a wider audience. This is still to a large extent the case. TI-S do however have a number of mechanism in place for internal learning purposes such regular regional meetings and project meetings to gather and share successes and an AMM where Chapters can showcase their work.

It is paradoxical that the organisation is one of the few that collects systematically high quality information, comparable over time, of the problems which it seeks to address, while at the same time not seeking to link it to specific outcomes which it has achieved. There is therefore very limited evidence of the outcome and impact of TI-S work over the last ten years. This not only hinders the current evaluation, but also any effort which TI-S could make to describe its efforts in a manner that allows external supporters (in particular donors) to build on its strengths and help it deal with constraints.

The reporting is predominantly on activities, and only few evaluation reports have been carried out in selected areas or programmes. The multi country programmes are an exception where end of project evaluations (and sometimes midterm reviews) do take place.

However in general the narrative reporting tends to lump together different levels of analysis (activity, output, outcome and impact) with no clear definitions of terms.

This is further complicated by the fact that the organisation does not have a central Monitoring and Evaluation (M&E) function, , while on the other hands some donors insist on the application of specific planning and reporting tools, such as the logical framework. This leads to the risk that different mutually incompatible systems and terms are used within the organisation.

At the same time the organisation has identified M&E as a priority for future development. An external consultant has been employed to design a process that combines a single collection method for information which can be analysed through multiple templates. Many of the chapters visited struggled with how to measure the results of their anti corruption work and would have liked guidance from TI-S.

Pressure has been increasing from some bilateral aid donors to develop a more results-based form of M&E, with implications for the planning frameworks of the organisation. Some, in particular, are pushing for results based management, including in particular quantitative indicators.

The most significant challenge to such an approach is that the degree of attribution that is feasible to find between a TI activity and a change in the situation of corruption in a given context is low. Both the wide variety of factors and the confidentiality of much information prevent such a development.

An example of this can be found in the Advocacy and Legal Advice Centres (ALACs) which provide the movement in general – and TI-S in particular - with valuable documentation for global evidence- based advocacy. The large amount of primary data from ALACs has so far not been harnessed, although serious steps have been taken to rectify this shortcoming. It is possible, as has been done for the present evaluation, to establish a chain of causality between the work carried out and actual changes, but certain assumptions are not fully tested.

Some relatively simple steps could however be taken to enhance M&E. The first approach would be to adopt a case study approach, commissioning small scale evaluations on particular priorities and programmes, on the basis of specific research questions defined in advance. Another, which is being promoted by the current working group within TI-S and by the external consultant, is to develop a simple template that could capture multiple frameworks, but which would include a cascade of objectives and indicators.

Another relatively simple approach would be to develop an analysis of contribution to impact which would take into account specific drivers in the situation, and assess the degree to which the outcomes achieved have influenced those drivers over time. Drawing for example from Environmental and Social Impact Assessment as it is carried out in mining and oil industrial projects, this assessment could look at the relevance of the influence of an outcome to a driver, its extent, and aits duration. This would provide a much better evidence base on the success of initiatives, even though it would not completely resolve the issue of attribution.

What exists instead is a tendency for donors to (aptly) require highly specific proposals for project funding, in which drafting skills and a good understanding of key words and donor policies are key. However an excessive reliance on these upstream controls tends to reward good proposal writing, and to reduce the pressure to report on the actual success or otherwise of the activities. The actual controls exercised during implementation tend to concentrate on the financial aspects and the outputs, and limited donor dialogue is not conducive to the enhancement of performance.

9. Conclusions

9.1 Relevance

In the 1990s TI's major achievement was in drawing international attention to the problems associated with corruption, and placing them squarely on to the policy agenda. As discussed, the Corruption Perceptions Index (CPI) played a major part in this international awareness-raising. From a campaigning perspective, one of the merits of the CPI was – and is – its simplicity: its apparent ability to synthesise a multitude of information into a single score.

However, the CPI and the groundbreaking activities of TI's first seven years were only the starting point. In the period under review in this evaluation, there was, more than ever, a growing sense of the complexity and the intractability of the problems associated with corruption. TI has itself contributed to this sense of complexity through its own research, including the surveys and indices that now complement the CPI. It perhaps also contributes to the sense of intractability. Corruption was always seen as a multi-headed monster. Now it seems that the monster has even more heads, and that they are even more secure. So how far has TI – and the wider policy community – been able to respond to the problems that it has itself helped to put on the agenda?

In our evaluation no one – either inside or outside the movement - doubted that TI has continued to play a distinctive national and international role that could not be replaced by any other actor or group of actors. The question of relevance that we are asked to address is specific to TI-S: how far are the secretariat's programmes and tools aligned to the needs of the wider TI movement in support of the international campaign against corruption?

As discussed in sections 2 and 3 of this report, TI's evolution and current structure is in part the result of a specific set of geographical and personal circumstances. Arguably, TI's formal structure (for example the role and status of the Individual Members) still reflects the legal requirements of an organisation originating in Berlin rather than London or Nairobi. However, our overall assessment is that the movement has continuously evolved in the course of the last decade – at times chaotically – but in a direction that makes sense in view of the objectives that it has set itself. This applies in particular to the fundamental questions as to whether a Secretariat is needed at all and, if so, how far the movement should be centralised

To answer the basic question, the complexities of corruption require that it should be fought at several levels: global, national and local. TI-S has defined for itself a

coherent role as the representative of a wider global movement that can speak – and be listened to – in the United Nations, the World Bank, the OECD and other key organisations on the world stage. The relationship with the chapters is clearly symbiotic. TI-S's legitimacy and authority derives from the chapters: they in turn carry more weight in their own countries because they are part of a wider international movement.

The answer to the second question – the balance between Berlin and the chapters – remains fluid, even contested. The movement attracts – indeed requires – strong-minded, argumentative people. The chapters have their own sources of finance (even if these are not as secure as might be hoped) and their own local sources of support. The stronger ones do not 'need' TI-S in that they would be well able to exist without it. However, the support that the wider movement provides goes well beyond the brand name (vitally important though this is). Even more importantly, it includes the spreading of ideas and approaches that can be adapted locally, and can in turn serve as source of inspiration in other region. The spread in the last five years of the Advocacy and Legal Advice Centres (ALACs) is a striking example of an initiative that has been fostered by TI-S, and which now has acquired an international momentum of its own. Our overall conclusion is that the balance will remain contested on specific issues – and by specific individuals - but that overall the model works.

Nevertheless, there remains a question of focus. Given that the problems of corruption are so wide and complex, is TI – and specifically TI-S – trying to do too much? Could it achieve more if it attempted less?

The sheer diversity and the multifaceted nature of the programmes espoused by TI-S evoke admiration, and at times a degree of bewilderment. TI is ostensibly a 'single-issue group', but the single issue of corruption can touch on a particularly wide range of related policy agendas, from climate change to education, public procurement and poverty reduction. One of the challenges facing an organisation which aspires to be the global anti-corruption movement is that it feels the need to establish a position on – and contribute to – a particularly wide range of related debates. It is easy to summarise TI's mission, but much harder to encapsulate the full range of its activities in a single sentence or paragraph.

As will be discussed below, part of the answer to these questions will come from working in collaboration with other specialist organisations, and from the development of specialist centres of expertise within TI. However, there was one central theme where the team felt there should be more strategic focus across the movement: the private sector.

Here two points should be made. First, the private sector has been central to TI's activities from the beginning inasmuch as it frequently provides the 'supply side' to public sector corruption. Secondly, the TI-S private sector team has been very successful in developing a set of anti-corruption tools that have helped define implementation standards in – for example – the UN Global Compact and the World Economic Forum. However, these advances have not been as widely embraced as

might be expected within the movement (with significant exceptions such as the UK).

The reasons for this apparent reluctance of course vary, and on this as on so many other issues there is no single pattern across the chapters. However, despite TI's reputation as something of an elite organisation with roots in institutions such as the World Bank, the evaluation team often encountered a certain 'cultural' reluctance to engage with the private sector, particularly among activists whose primary life experience outside TI came from other civil society groups.

This is an imbalance that should be corrected primarily because of the central importance of the private sector as part of the 'solution' to corruption, as well as part of the problem; and secondly because, wisely managed, the private sector may in future be a source of funding. Wise management includes avoiding any source of funds that might compromise TI's impartiality, a principle which also applies to government sources of funds.

9.2   Effectiveness

Effectiveness is defined as the degree to which stated objectives have been met. Here, the evaluation – and the organisation itself – runs into a challenge because objectives of TI, and of TI-S, are so broad. However, it is clearly possible to point to significant successes, as well as constraints.

First, at the broader national and international levels the evaluation team was able to validate the importance that media, academia, governments and businesses give to TI's work, reflected in the number of times its findings are quoted. Different users of course cite different aspects of TI's work: the mainstream media tend to pick up the survey results most eagerly. Policy makers cite more analytical studies (for example there were a number of references to TI in the briefing documents produced by the UK Ministry of Justice in the months leading to the passing of the UK Bribery Act).

Secondly, TI-S can point to considerable success in the development of its internal resources, and in attracting the funds needed to support them. The expansion of the secretariat in the last ten years is in itself a form of evidence. Rather more important is the use to which TI-S has put these resources. These include, for example, the TI-S's role in safe-guarding the integrity of the movement through the membership and accreditation process, and its development of new surveys, indices and research methods.

The most significant constraint – perhaps better expressed as a 'challenge' – concerns the diffusion of knowledge within the movement. As discussed, knowledge flows in several directions: most obviously from TI-S to the chapters, and through the chapters to wider constituencies in their respective countries; and from the chapters to TI-S and thence to wider global audiences. At the same time, several respondents identified a need for more horizontal exchanges between chapters that are not necessarily mediated by Berlin. These exchanges do take place: the question is how they can take place more. So far Chapter Zone (TI's intranet) has

apparently been of relatively limited use although the launch of a redesigned intranet in November 2010 may begin to address this shortcoming.

A second central constraint is the project-based funding that prevails in the chapters, which TI-S is only partly able to balance through its own funding to chapters which is also restricted funding earmarked for specific pre-set priorities. Donor-driven priorities do not necessarily reflect TI priorities such as advocacy and organisational capacity building support to chapters as well as the need to address both grand and petty corruption and to focus on countries in low, middle and high income countries.

9.3 Efficiency

The issue of efficiency again relates to the question of focus, as well as TI's relationship with other organisations working on related issues in the anti-corruption arena: what is distinctive about TI, and how can it put its particular assets to best use? It also relates to a second cross-cutting issue: efficiency requires not just breadth but also depth - targeted objectives supported by specialist expertise.

From the outset TI has defined itself as an organisation that works in coalition. This approach derives partly from pragmatism based on limited resources, but also from principle: the multifaceted problem of corruption demands equally multifaceted solutions from a variety of actors. TI's non-confrontational approach – including its non-involvement in investigations – makes collaboration with these actors that much easier.

Despite the diversity of the movement (as highlighted in section 3), there was striking evidence of a shared ethos across widely differing cultures. For example, in both Indonesia and the UK local chapters contrasted their own approach of engaging government institutions from the inside with the more confrontational stance of other NGOs working in the same field. They felt that the TI approach had made it easier to influence government leaders, thus promoting tangible reforms, while also acknowledging that the other, more aggressive NGOs might play a complementary role. In effect the two kinds of NGOs played a 'hard man/soft man' double act.

However, both within the movement and outside we encountered questioning about the extent to the extent to which the traditional 'soft man' collaborative approach was still sufficient. This also relates to the questions of knowledge management and advocacy discussed in section 5.1. Well-phrased research was of limited use if it stayed 'on the shelf', or came off the shelf but was politely ignored.

When considering other organisations active in the anti-corruption field, the TI insiders we interviewed often spoke with respect of Global Witness, the UK-based campaigning NGO which has made a name for itself in relation to governance of natural resources. Global Witness and TI have worked together, notably in the Publish What You Pay campaign to persuade oil, gas and mining companies to declare the revenue that they pay to host governments. However, Global Witness's reports are notably different from TI's their more aggressive style. Although much

smaller than TI, it has made a very significant impact, both in terms of publicity but also through contributions to policy.

In discussions in and around the International Anti-Corruption Conference in Bangkok, representatives of several different TI chapters expressed a willingness and even an enthusiasm to adopt a more confrontational approach to authority, for example in support of whistleblowers, even if this subsequently made it harder to work in coalition. However, the more important lesson from Global Witness may be to do with the focused use of specialist expertise.

In practice, there are two ways of developing this expertise. The first is for TI to work with organisations that already have it, and for TI to pool its specialist knowledge on corruption with – say – water experts. This is the approach adopted with the Water Integrity Network for which TI-S serves as the secretariat. The second is for TI itself to develop specialist centres of expertise which – as with TI-UK's Defence Initiative – do not necessarily need to be based in Berlin.

An important aspect of efficiency concerns the reporting of results, and the development of new strategies in response to change. The shift to greater objectives-based reporting has begun to take place, and should allow the organisation to gain a better understanding of its own performance. Reporting still remains dominated by reporting on outputs (few evaluations have been carried out, for example) and particular project strands. This means that significant achievements often are not recorded, or not recorded properly, and that TI misses the opportunity to draw a connection between the success of specific projects and the broader anti-corruption picture.

The administrative systems of TI-S (and many of the chapters) have grown considerably over the years, but remain weak in certain areas, such as personnel development, monitoring, and technical support for research. The consequence is that performance is adversely affected. The key problem is that of retaining the right level of staff. Like many of the chapters, notably TI-Deutschland, TI-S has begun to make greater use of high-level technically-skilled volunteers. This could prove a very efficient way of achieving results.

The demographic structure of both TI-S and the chapters is striking and quite similar to other international CSOs: it is predominantly staffed by younger and highly motivated and educated personnel, while the higher echelons of management and the Board tend to be older. TI-S saves resources by having primarily younger staff members. However the staff positions that should be occupied by experienced mid- and senior-level managers are too few to ensure that certain functions, such as supervision of the programmes, is fully carried out. For example, a senior Monitoring and Evaluation (M&E) expert tasked with developing and supervising M&E might provide more value for money than having a larger group of staff members from different departments in charge of upgrading and coordinating M&E efforts.

9.4 Sustainability and Donor Issues

The TI movement has gradually 'filled' its organisational model, in the sense that it has developed an unparalleled network of chapters that work to well defined objectives. However, this process has not been accompanied by a stable resource flow, and the indications are that in future the main challenge will lie in the source, predictability and distribution of funding. The evaluation concludes that the Secretariat has reached its critical scale, and that the most significant strategic choices lie in its relation to chapters.

This process would be helped if donors such as Norad engaged in enhanced dialogue with TI on both policy and results at both the secretariat and the country chapter levels. Some embassies of donor countries have their own funding budgets but they could be encouraged to complement HQ policies with locally supported efforts.

The 'north-south' divide that is applied by some donors is problematic in that many of the most significant anti-corruption issues – for example those relating to forestry management, private sector corruption or the integrity aspects of climate change - are transnational and inter-regional. In general, project funding premised on quick-wins has not contributed to the sustainability and outreach of the movement although there have been notable exceptions, such as the contributions of Danida's Indonesia office to a sustained campaign on Integrity Pacts. This example points to the fact that project funding achieves better results over the medium term since many chapters are in the process of 'learning by doing', an important means of building local knowledge and experience.

The overall cohesion of the Movement is well preserved (through accreditation in particular), and TI-S is developing specialised forms of support to the chapters, such as on security, which will enable them to do their work even more effectively.

In the long run, TI will continue to grow, but its best opportunity is to do so not through those choices that will make it an 'insider' amongst governments and businesses, but rather sharper in its analysis, pushing deeper in certain critical areas. TI could safeguard its diversity while developing a stronger identity, including a strong mix of a research based advocacy organisation with local roots, benefiting from a multi-polar governance structure that gives it unique strengths as a global organisation.

10. Recommendations

10.1 Donor Policy Framework

Donors should provide long-range funding to TI-S and supplement that with embassy-based funding to the chapters along a common priority framework, with additional donor resources earmarked to M&E.

We recommend that this common priority framework should be based on the new five-year *Transparency International Strategy 2015* which, as noted above, was under discussion while this evaluation was taking place, and was formally adopted in November 2010. The document identifies ten strategic priorities linked to the core themes: "promoting our common focus", "empowering our diversity", and "organisational development". On the basis of discussions with TI and between donors, the framework should identify critical funding gaps to support the strategy. These discussions could take place during the annual donors' meeting with TI, supported by appropriate advance preparation.

In the light of this dialogue, the priority framework should define specific objectives that are consistent with the donors' overall policy objectives. As one example, we recommend that it should earmark additional resources for M&E in particular. Embassy funding will naturally be influenced by local priorities. However, if there is an agreed international priority framework, it will be easier to ensure that local funding is compatible with the overall strategic objectives both of the donors and of the TI movement.

Donors should require a clear identification of progress concerning the following aspects:
- *Clarification and monitoring of TI-S's support strategy for the national chapters.* We envisage that this should take the form of focused TI-S support for fundraising, monitoring, and inter-chapter exchanges. Donors should require clarification of the roles of chapters within the governance of the movement. A more clearly defined modus operandi for communication between chapters, would allow for more effective issue-based or practice-based forms of cooperation.
- *A TI-S-led Planning, Monitoring and Evaluation process.* We envisage that this will build on the recent strategy consultation to identify specific objectives to meet the new strategy's overarching goals, as well as the processes that TI will adopt in order to monitor progress. We recommend that TI-S should develop a consistent definition of performance assessment terms and concepts. This should facilitate TI's dialogue with donors by clarifying the type of performance

that is being tracked, and its contribution to the movement's overall goal of combating corruption.

The priority framework would contain objectives of a more specific nature than those to be found in donor policy statements. Adopting it should hence not require realignment of donor targets. In essence the objectives pursued by donors as regards TI would not change, they would simply be rendered more cogent by further specifications. While Embassies naturally operate according to their own funding frameworks and earmarking priorities, an awareness of the global priority framework would assist in creating complementarity. It is acknowledged that earmarked funding will remain widespread, but the inherent value of fitting in a deliberate way into a set of priorities is clear.

* *A commitment to strengthen specific levels of management and expertise within TI-S.* The areas to be addressed include personnel management, and career planning, although we do not envisage a significant expansion in the size of TI-S. Working-level staff should receive specific support for travel, training and communication, to strengthen chapter to chapter communication. Specific forms of chapter support, in particular as regards security, planning, knowledge-sharing and M&E, should also receive targeted funding.

10.2 Donor Dialogue with Transparency International Secretariat (TI-S)

Progress should be annually discussed with donors, with the possibility of interruption should certain standards not be met.

Funding decisions should be informed by independent evaluations as well as internal M&E, and be made conditional on performance. This approach will address the difficulties that TI faces in funding certain priority areas, and reduce the detrimental effect of donor trends defined by factors that have no relation to anti-corruption (for example the trend towards more support for government budgets and less to civil society, due to the lower priority given to Middle Income Countries and to alignment with government priorities in developing countries). The approach will also limit the effect of restricted funding, often based on standard of living, country by country, or even thematic considerations, on efforts that need to be truly transnational and integrated. Following this line of thinking, funding for private sector initiatives, and funding for organisational development, should be priorities of the dialogue.

The allocation of subsequent phases of funding should depend on TI's ability to define strategic areas of intervention and to report on the influence that it has had in these areas. Poor performance should lead to reviews and adjustments, linked to the evidence. As discussed above, it is not expected that funding through Embassies will follow the same strategies as global funding, it should as far as possible be related to the donors' common priority framework.

Following the above two recommendations will mean that TI-S becomes still more of a knowledge centre, carrying out more capacity development, and facilitative

support for chapter-level issues than is currently the case. The Secretariat should enhance its core functions, including M&E, and personnel management.

10.3 Recommendations to Transparency International Secretariat (TI-S) Regarding Resources and to Support the Chapters to a Greater Extent

The first step is to make the chapters in the more developed countries more self-sufficient in funding. This could be approached in a number of ways. One is premised on a more intense and nuanced relation with the business sector, whereby more recognition should be given to the fact that corruption is now recognised by reputable companies as a critical risk, and collaborative approaches are required. Some chapters have reservations about accepting private sector funding in case this compromises their independence and, in order to address these concerns, TI-S could work with them to develop guidelines and rules of engagement clarifying what is and is not acceptable to the movement.

The second would be based on the sale of research products, including greater use of interactive media. This is distinct from providing consultancy services, but would rely on the utilisation of existing information as an asset to generate funds. While there are issues to be addressed regarding the public nature of the documents, based on their source of funding and their destination, it could very well be that far from creating a barrier to dissemination, payment for research defined by the market becomes a complementary source of funds.

Similar to the support from the EU to developing National Integrity Systems assessments, or the multi-country programmes, TI-S could also assist regions in obtaining project funding for common issues that pertain to a group of chapters or a region. Such support would also provide TI with opportunities to conduct more research and analysis, research that is issue based and tracks closely local developments.

The general areas of recommendations made above for donors should naturally be reflected as priorities for TI-S as well. This includes:
- Defining certain centres of excellence, to be cultivated both in Berlin and elsewhere, based on enhanced monitoring and evaluation in relation to trends in corruption
- Weaker chapters should receive more necessary assistance, based on a framework that identifies country needs and pinpoint particular areas where action is required. TI-S should reinforce existing initiatives in the area of electronic networking and transfers of information, as well as applying social media to intramovement communications and advocacy. Dedicating more resources, and clearer roles, could involve protection of members of the movement that are situated in a highly insecure environment
- In the case of M&E, more priority needs to be given to context, and anti-corruption efforts. Results need to be monitored on the basis of the specific impact of the developed activities.

Annexes

Annex 1:
Terms of Reference

1   Background

Transparency International is a global civil society organisation leading to fight against corruption. Through more than 90 chapters worldwide and an international secretariat in Berlin, Germany, TI works to raise awareness of the damaging effects of corruption and cooperates with partners in government, business and civil society to develop and implement effective measures to tackle it.

Norway has supported Transparency International (TI), both its Secretariat in Berlin (TI-S) and its National Chapters (NCs), for many years. In 2004 the Ministry of Foreign Affairs transferred the responsibility for support to TI to Norad. It is estimated that Norad in the period 2005 to 2010 will have supported TI with core support of NOK 15,7 mill.

There have been many reviews and evaluations of various programs that TI-S implements, but there is no recent independent overall evaluation of TI-S. In the TI-S donor meeting in Berlin in October 2009, Norad informed TI-S and other donors that it intended to conduct such an evaluation. Norad has consulted TI-S and some major donors to TI-S in the preparation of the ToR for this evaluation.

2   The Evaluation Purpose, Questions, scope and methodology

2.1 Purpose

The purpose of the evaluation is to evaluate the Transparency International Secretariat and to derive lessons which will enable the TI-S and the wider movement to inform its strategies, programmes, approaches and set-up. The lessons learned will also inform the future relationship between TI-S and Norad. The lessons will be drawn from a systematic assessment of the relevance, effectiveness, efficiency and sustainability of Transparency International's interventions to fight corruption.

The target audience and main users of the findings of the evaluation will be Norad, Norwegian embassies and Transparency International (TI-S, NCs, board, etc). TI-S partners and other stakeholders will also benefit from the findings (including other donors, governments, private sector, research institutions, NGOs, media).

2.2 Objectives and Scope

The main evaluation objectives are:

Assess the efficiency and effectiveness of TI-S to fight corruption with respect to the results achieved.

Assess the strengths and weaknesses of TI-S in fighting corruption.

The evaluation will apply the DAC evaluation criteria of relevance, effectiveness, sustainability, and efficiency. The evaluation should report on selected outputs and outcomes achieved by TI-S. While impact will not be a core focus of the evaluation, evidence of impact should be reported on when found in the evaluation.

Where areas for improvement are identified, clear recommendations on how improvement should be achieved should be included in the report.

The focus of the evaluation will be on the work of the TI Secretariat in Berlin and its relationship with and added value and support to selected National Chapters.

The time frame for the evaluation will be from 2000 to date and the evaluation should hence cover developments in TI's strategies, programming, structure and context over this time frame. The evaluation will also discuss Norway's relationship with TI-S. The evaluation should indicate how Norway can best support TI-S in the future.

2.3 Key Evaluation Questions

The key evaluation questions follow the DAC criteria of relevance, efficiency, effectiveness and sustainability.

Relevance

Are TI-S's activities, programmes and tools relevant to achieve the objectives of the TI movement? (specific activities, programmes and tools shall be selected in consultation with TI-S and Norad during the inception phase and will be analysed in detail)

Are initiatives to combat corruption based on adequate needs and context analyses? Are TI-S's activities and programmes relevant for the global fight against corruption? Are its target audiences clearly defined?

Have TI-S objectives been well defined in the context of the global fights against corruption? Have they responded to changes in the external environment/internal capacity? Are they clearly understood within TI-S and in the NCs visited?

Is the structure of TI-S relevant to address the capacity and other needs of the chapters and achieve its objectives?

Are the areas of focus consistent with Norad and other donors priorities in the field of Anti-Corruption?

Is the Secretariat meeting the capacity development and other needs of the Chapters?

What is the added value of the Secretariat for the chapters?

Effectiveness

Is the TI Secretariat achieving satisfactory progress towards its stated role and objectives?

What are the reasons for the achievement or non-achievement of objectives? Have any corrective measures been identified and/or considered?

What can be done to make TI-S's interventions more effective in order to achieve the objectives of the Secretariat and of the movement?

How appropriate is Results Based Management for the organisation? What are its opportunities and challenges? Should changes be made in the TI-S planning, monitoring, evaluation and reporting systems and procedures and if so which?

Efficiency

Are anticipated activities and outputs being delivered on time and according to specifications? (specific activities and outputs will be selected during the inception phase and will be analysed in detail)

How is TI-S coordinating its activities with other regional and global organisations and initiatives to avoid duplication? Can coordination be improved and if so how?

What are the problems and constraints the Secretariat faces during implementation of activities, programmes and tools?

How is the financial and administrative set up for TI-S? Does TI-S represent "good value for money" in relation to the results achieved?

How are regional and global projects identified and budgeted?

Sustainability

To what degree are the interventions and activities analyzed in the evaluation adequately resourced? Has TI-S been able to scale up its work, and what can be learned from experience to ensure financial viability in the future?

Are National Chapters and TI partners consulted in designing Secretariat interventions and priorities and during their implementation?

Are global and regional programs coordinated by the Secretariat consistent with National Chapter priorities?

Do the National Chapters have the capacity to continue their activities without the Secretariat's support?

Is the TI Secretariat a 'learning organisation'? Are results from evaluations and reviews disseminated and followed up internally in the organisation? How effective and efficient is TI-S in bringing knowledge and lessons learned from one part of the

movement to the rest of the movement? Are there incentives to encourage learning and use of lessons learned?

Impact

As mentioned earlier, due to the complications in measuring impact, this is not the core focus of this evaluation. The following questions would nevertheless need to be answered

Can evidence be found of the work of TI-S having an impact in the global fight against corruption?

Have there been any unexpected positive or negative impacts resulting from TI-S' s work?

Is TI-S cooperating and coordinating its efforts with relevant institutions and actors to maximize its impact?

Additional questions

What are the strengths, weaknesses, opportunities and threats in the relationship between TI-S and Norad?

How could TI-S and Norad build on its current relationship?

What are the strengths, weaknesses, opportunities and threats in the relationship between TI-S and other donors and stakeholders (e.g. governments, private sector)?

How could TI-S and other donors and stakeholders build on its current relationship?

What type of future support would TI-S need from Norad and other donors to achieve its objectives and fulfil its mandate? (e.g. Coalition building? Financial? Organisational development? Other?)

Are there possible conflicts of interest when funds are from (1) private and (2) donor agencies?

2.4 Evaluation Approach/Methods

It will be part of the assignment to develop a methodological and conceptual framework to ensure an objective, transparent and impartial assessment of the issues to be analysed in this evaluation as well as ensuring learning during the course of the evaluation.

The evaluation team should make use of empirical methods such as document analysis, interviews, focus groups, field visits, case studies and data/literature surveys to collect data which will be analysed using specified judgement criteria and suitably defined qualitative and quantitative indicators.

The team is expected to interview different stakeholders including TI-S and NCs at country level, Norad, and other partners including international, multilateral and non-governmental organisations depending on the case programme/projects selected.

In order to document results at output and outcome level as well as identifying lessons learnt, during the inception phase the consultant, a few cases at project/ programme level should be selected for closer scrutiny. The proposed cases should be selected using the criteria (i) size of funding (ii) cases representing different interventions and (iii) cases representing different geographical target areas. The proposed case studies should be presented in the inception report for discussion with TI-S and Norad.

Data collection
The evaluation team is responsible for data-collection, management, analysis and reporting. Access to archives will be facilitated by TI-S and Norad.

Validation, interpretation and feedback workshops shall be held, involving those that have provided information, and others who are relevant.

Field visits
As a part of the process to identify how TI-S has impacted on its chapters, field visits to six national chapters are envisaged in this evaluation. Chapters will be selected during the inception phase based on criteria agreed upon between the consultants, Norad and TI-S. Considering TI works globally a (sub) regional spread in the selection of national chapters is necessary.

Annex 2:
List of Persons Met

List of Persons Met			
Surname, Name	**Org. and function**	**Gender M/F**	**Country**
Akram, S.M	TI Bangladesh, Senior Fellow - Research and Policy	M	Bangladesh
Alam, M.Waheed	TI Bangladesh, Senior Fellow - Research and Policy	M	Bangladesh
Alam, Mir	Madhupur Diabetic Centre, Executive Director	M	Bangladesh
Alam, Rezwan	TI Bangladesh, Director - Outreach and Communications	M	Bangladesh
Ali, Sohel Ibn	Swiss Agency for Development and Cooperation (SDC), Senior Programme Officer - Local Governance	M	Bangladesh
Alo, Aleya Begum	TI Bangladesh, Senior Manager - HR	F	Bangladesh
Anam, Shaheen	Manusher Jonno Foundation, Executive Director	F	Bangladesh
Biswas, Arup	Norwegian Embassy, Senior Adviser - Development Affairs	M	Bangladesh
Chakraborty, Karun	TI Bangladesh, Programme Manager - Civic Engagement	M	Bangladesh
Chaudhury, Iftekhar	TI Bangladesh, Director - Research and Policy	M	Bangladesh
Choudhury, Rasheda	Campaign For Popular Education (CAMPE), Executive Director	F	Bangladesh
Chowdhury, Navid	DFID, Social Development Advisor	M	Bangladesh
Haque, Rejaul	TI Bangladesh, Senior Manager - Finance and Administration	M	Bangladesh
Hossain, Kamal	TI, Advisory Council Member and IM	M	Bangladesh
Hussein, Sajjad	TI Bangladesh, Senior Manager - Outreach and Communications	M	Bangladesh

List of Persons Met			
Surname, Name	**Org. and function**	**Gender M/F**	**Country**
Iqbal, Hanif	Bangladesh Anti Corruption Commission, Director General	M	Bangladesh
Jahan, Shameem Akhter	TI Bangladesh, Senior Manager - M&E	M	Bangladesh
Kabir, Khushi	Nijera Kori, Coordinator	F	Bangladesh
Kamal, Sultana	ASK, Executive Director	F	Bangladesh
Khan, M. Hafizuddin	TI Bangladesh, Chairman of the Board	M	Bangladesh
Khan, M. Riazuddin	TI Bangladesh, Senior Manager - Training	M	Bangladesh
Khanom, Fajila	TI Bangladesh, Senior Programme Manager	F	Bangladesh
Khursheed-Ul-Islam	Senior Advisor	M	Bangladesh
Rahman, Mustafizur	Centre for Policy Dialogue (CPD), Executive Director	M	Bangladesh
Rowshan, Rokeya	TI Bangladesh	F	Bangladesh
Tabet, Tommaso	Swiss Agency for Development and Cooperation (SDC),Assistant Coordinator - Local Governance	M	Bangladesh
Zaman, Iftekhar	TI Bangladesh, Executive Director	M	Bangladesh
Aupperle, Adrian	TI EU Liason Office, Policy Officer	M	Belgium
Carney, Des	TI EU Liason Office, Policy Officer	M	Belgium
Mittermaier, Jana	TI EU Liason Office, Head of Office	F	Belgium
Dorte Chortzen	Team leader, Civil Society Dept	F	Denmark
John Bethelsen	Deputy Chair	M	Denmark
Paul RiisKjær Mogensen	Chair	M	Denmark
Søren Davidsen	Senior Advisor, Governance	M	Denmark
Siwatibau, Suliana	Former Chair of the Board, TI Fiji	F	Fiji
Caitlin Ryan	Programme Coordinator, TI Georgia	F	Georgia
Derek Dohler	Digital Analyst	M	Georgia

List of Persons Met			
Surname, Name	**Org. and function**	**Gender M/F**	**Country**
Devdariani, Zviad	Director, Civil Development Agency	M	Georgia
Durglishvili, Eka	Financial Manager, TI Georgia	F	Georgia
Gutbrod, Hans	Caucasus Research Resource Centre, Regional Director	M	Georgia
Kakha Mamukadze	Disaster Mitigation Coordinator, Georgia Red Cross	M	Georgia
Kaldani, Tamar	Deputy Executive Director, Open Society	F	Georgia
Keinishvili, Nana	President, Georgia Red Cross	F	Georgia
Khatiskatsi, Nina	Programme Director, TI Georgia	F	Georgia
Lashkhi, Irina	Programme Coordinator, Human Rights and Good Governance, Open Society Institute	F	Georgia
Lezhava, Vato	Adviser to the President, Republic of Georgia	M	Georgia
Lobzhanidze, Nana	Programme Assistant, TI Georgia	F	Georgia
Mari Gabedava	Project Manager, TI Georgia	F	Georgia
Mariam Kiasashvili	Assistant, TI Georgia	F	Georgia
Mullen, Mark	Chair of the Board, TI Georgia	M	Georgia
Nino Zuriashvili	Journalist	F	Georgia
Tamuna Karosanidze	Former Director, TI Georgia	F	Georgia
Banoba, Paul	Senior Programme Coordinator, Transparancy & Integrity on Service Delivery, Africa, health sector, Africa & Middle East Region	M	Germany
Bäsler, Doris	Programme Manager, Africa & the Middle East	F	Germany
Cutzach, Stan	Governance Manager	M	Germany
Dell, Gillian	Global Programme Manager	F	Germany
Doren, André	Director of Communications	M	Germany
Eigen, Peter	TI, Founder and former chair. Chairman of the Advisory Committee, EITI, Chair	M	Germany

List of Persons Met			
Surname, Name	**Org. and function**	**Gender M/F**	**Country**
Elers, Ben	Senior Programme Manager, ALAC	M	Germany
Elshorst, Hansjörg	TI-Deutschland, Chair of 'Beirat', Former Managing Director TI-S, IM	M	Germany
Fabie, Pascal	Director of people and Organisational Development & Regional Director for Asia & the Pacific	M	Germany
Gary, Michel	TI-S, Programme Coordinator, Forest Governance Integrity	M	Germany
Heinrich, Finn	Programme Manager, Policy & Research	M	Germany
Hodess, Robin	Director of Policy & Research	F	Germany
Kelso, Casey	Advocacy Director	M	Germany
Mahassan, Patrick	Resources Director	M	Germany
Marin,Milena	Assistant Programme Coordinator ALAC	F	Germany
Marschall, Miklos	TI-S, Regional Director,Europe & Central Asia, Director for IACC	M	Germany
Polvi, Johanna	Programme Manager, Governance and Transparancy Fund	F	Germany
Poortman, Christiaan	Director Global prgrammes	M	Germany
Quine, Thom	TI-S Web Communications and Publications Manager	M	Germany
Reiter, Zoe	Senior programme Coordinator, Americas		Germany
Riano, Juanita	Programme manager, Policy & Research	F	Germany
Rozo, Marcela	Programme Manager, Public Contracting, Global Programmes	F	Germany
Salas, Alejandro	Regional Director Americas	M	Germany
Salas, Alejandro	TI Secretariat, regional Director Americas	M	Germany
Sandoval, Nikola	Programme Manager,Asia & the Pacific	F	Germany
Swardt, de Cobus	Managing Director	M	Germany
Thayenthal, Anna	Assistant Programme Coordinator, Asia & the Pacific	F	Germany

List of Persons Met			
Surname, Name	Org. and function	Gender M/F	Country
Uwimana, Chantel	Regional Director Africa and the Middle East	F	Germany
Valérian, Francois	Head of Private Sector programmes, Global programmes	M	Germany
Visser, Ronald	Senior resource Coordinator	M	Germany
Weber, Janine	LTA secondee from Germany	F	Germany
Zellman, Conrad	Senior Programme Coordinator, Europe and central Asia, ALACs	M	Germany
Zoubklov, Paul	Programme Coordinator, Europe and Central Asia	M	Germany
Isaac Nai	Financial Manager	M	Ghana
Linda Ofori-Kwafo	Programme Officer	F	Ghana
Vitus Azeem	Director	M	Ghana
Carlos Contreras	Vice President, TI Guatemala	M	Guatemala
Castro, Maria	Institute of Social Studies	F	Guatemala
David Gaetan	Programme Manager, TI Guatemala	M	Guatemala
Flores, Jaico	Fondo national para la Paz		Guatemala
Gargollo, Jorge L.	CIEN Vice President	M	Guatemala
Instefjord, Idar	First Secretary, Norad	M	Guatemala
Juanita Riano	Programme Manager, TI Guatemala	F	Guatemala
Maldonado, Pedro R.	CALAS	M	Guatemala
Marvin Flores	Programme Manager, TI Guatemala	M	Guatemala
Meonio Ramirez, Marcotulio	Director, Oficina Nacional de Servicio Civil ONSEC	M	Guatemala
Nestor Lopez	Programme Manager, TI Guatemala	M	Guatemala
Oscar Bocanegra	Programme Manager, TI Guatemala	M	Guatemala
Pivaral, Sergio	UNDP, Civil Society Coordinator	M	Guatemala
Ramirez, Marcotulio	Oficina Nacional de Servico Civil, Director	M	Guatemala

List of Persons Met			
Surname, Name	**Org. and function**	**Gender M/F**	**Country**
Salvador Monroe	Auditor, TI Guatemala	M	Guatemala
Karamé, Constantin N.	Norwegian Embassy, First Secretary, Political		Indonesia
Daniri, Mas Achmad	KNKG (National Commission for Governance Reform), Chairman	M	Indonesia
Dari, Eva	MP	F	Indonesia
Darwin, Ali	National Center for Sustainability Reporting, Director	M	Indonesia
Dharmasaputra, Karaniya	Viva News, Chief Editor	M	Indonesia
Dungga, Retha	TI-Indonesia, Director, Communications and Youth Program Officer	F	Indonesia
Dyasanti, Vidya	TI-Indonesia, Finance Manager & Public Finance Program Manager,	F	Indonesia
Fyffe, Charlie	Control Risks, Country Manager	M	Indonesia
Hayati, Utami Nurul	TI-Indonesia, M&E Office,	F	Indonesia
Makaminan, Ariefin	Indonesia-Netherlands Association, Sustainable Development and CSR Manager	M	Indonesia
Malik, Rizal	TI-Indonesia, former Secretary General; now based in Yogyakarta	M	Indonesia
Damhaug, Marianne	Norwegian Embassy, Minister Counsellor and Deputy Head of Mission		Indonesia
Masduki, Teten	TI-Indonesia, Secretary General	M	Indonesia
Moilak, Lebby	Parliamentary Representative in DPD (Upper House) for NTT	F	Indonesia
Paria, Nezar	Viva News, Managing Editor	M	Indonesia
Herland, Rita Elisabet	Norwegian Embassy, Intern		Indonesia
Saenong, Ilham	TI-Indonesia, Corruption information manager,	M	Indonesia
Setyaninghsih, Yuniearti	Danida, Programme Officer	F	Indonesia
Simanjuntak, Frenky	TI-Indonesia, survey specialist	M	Indonesia
Sudaryono, Leo	Asia Foundation	M	Indonesia

List of Persons Met

Surname, Name	Org. and function	Gender M/F	Country
Thornley, Andrew	Independent consultant, former RTI program manager	M	Indonesia
Vernaz, Florian	TI-Indonesia, Program Development Specialist,	M	Indonesia
Wibowo, Rezki	Deputy Secretary General, TI-Indonesia	M	Indonesia
Widoyoko, Dangan	Indonesia Corruption Watch, Coordinator	M	Indonesia
Yasin, Muhamad	KPK (Anti-Corruption Commission), Commissioner	M	Indonesia
Yulianto, Heni	TI-Indonesia, Procurement Specialist,	M	Indonesia
Ishii, Yoichi	TI-Japan, Chair	M	Japan
Konishi, A.	TI-Japan, Board Member	M	Japan
Ouchi, Minoru	TI-Japan, Board Member	M	Japan
Gacugia, Dorcas	Norwegian Embassy, Programme Officer - Development Cooperation	F	Kenya
Githongo, John	TI, IM	M	Kenya
Karanja, Lisa	TI Kenya, Deputy Executive Director/ Head of Programmes	F	Kenya
Kattambo, Victoria	Kenyan Anti-Corruption Comission, Principal Officer - Department of Prevention	F	Kenya
Kimeu, Samuel Mbithi	TI Kenya, Executive Director	M	Kenya
Koti, Rigmore Elianne	Norwegian Embassy, Counsellor - Development Cooperation	F	Kenya
Muthie, Justin	TI Kenya, Finance and Administration Manager	M	Kenya
Mwangangi, David	TI Kenya, Programme Coordinator - Governance and Policy Programme	M	Kenya
Wanjui, J.B	TI, Advisory Council Member	M	Kenya
Atalla, Sami	Freelance consultant, former LTA Board Member	M	Lebanon
Cazalet, Piers	UK Embassy,Deputy Head of Mission	M	Lebanon
El Meouchi, Badri	LTA Executive Director	M	Lebanon
Haddad, Dani	LTA, researcher	M	Lebanon

List of Persons Met			
Surname, Name	**Org. and function**	**Gender M/F**	**Country**
Hakim, Yahya	LTA Managing Director	M	Lebanon
Haytayan, Laury	Arab Region Parliamentarians Against Corruption (ARPAC), Executive Director	F	Lebanon
Khawaja, Paul	UK Embassy, Head of Trade and Investment	M	Lebanon
Saab, Fadi	LTA Board Member, Vice-chariman	M	Lebanon
Salem, Paul	Carnegie Foundation Middle East Center, Director, co-founder and former LTA Board Member	M	Lebanon
Sarkis, Natasha	LTA, Project Coordinator LALAC	F	Lebanon
Ziad Abdel Samad	Director, Arab NGO Network for Development	M	Lebanon
Zouein, Pamela	LTA Accountant	F	Lebanon
Zovighian, Gérard	LTA Chairman, member of TI International Board of Directors	M	Lebanon
Jaber, Layla	Control Risks, Middle East Consultant, Corporate Investigations, former LTA manager	F	Lebanon/UK
Gro Skaaren-Fystro	Director, TI Norway	F	Norway
Balde, Bady	Intern, EITI	M	Norway
Fridtjov Thorkildsen	Director, Norad	M	Norway
Hart, Liz	U4, Director	F	Norway
Ingrid Buli	Higher Executive Officer, Civil Society Unit, Norad	F	Norway
Moberg, Jonas	Head of Secretariat, EITI	M	Norway
Moberg, Jonas	Extractive Industries Transparency Initiative, Head of the International Secretariat	M	Norway
Slettemark, Guro	Secretary General, TI Norway	F	Norway
Ahrens, Michael	TI-Australia, Executive Director	M	Thailand
Best, Bronwyn	TI Canada	F	Thailand
Brooks, Jermyn	TI UK, Individual member	M	Thailand

List of Persons Met			
Surname, Name	Org. and function	Gender M/F	Country
Cane, Shave	UN Integrated Mission in Timor Leste, Governance Advisor	M	Thailand
Cockcroft, Laurence	TI UK, Individual member	M	Thailand
Cooksey, Brian	TI Tanzania, Individual member	M	Thailand
Eriksson, Fredrik	Norad, The Anti-Corruption Project	M	Thailand
Huguette, Labelle	Chair TI,	F	Thailand
Humborg, Christian	TI-Deutschland, Executive Director	M	Thailand
June, Raymond	Senior researcher, Global Integrity	M	Thailand
Numa, Akere	Vice- Chair TI, Individual Member	M	Thailand
Rooke, Peter	IM, former TI-S Asia Pacific Regional Director	M	Thailand
Sampson, Steven	TI-Denmark, also University of Lund	M	Thailand
Unqar, E	Executive Director, TI Colombia	F	Thailand
Urizar, Alejandro	Executive Director, Accion Ciudadana, Capitulo de Transparencia International	M	Thailand/ Guatemala
Arlman, Paul	TI Netherlands, Chair	M	The Netherlands
Hesselink, Jan-Willem	Siemens, the Netherlands, compliance officer	M	The Netherlands
Ranner, A.P.	TI Netherlands	M	The Netherlands
Barrington, Robert	TI-UK, Director of External Affairs	m	UK
Cockcroft, Laurence	TI-UK, Board Member, former Board Member of TI	M	UK
Krishnan, Chandrashekhar (Chandu)	Executive Director	M	UK
Landell-Mills, Pierre	TI, Individual Member	M	UK
Mason, Phil	DFID, Anti-corruption coordinator	M	UK
Pyman, Mark	Director of Defence Programme	M	UK
Taylor, Alison	Private Sector Programme Director	F	UK

List of Persons Met			
Surname, Name	**Org. and function**	**Gender M/F**	**Country**
Wilkinson, Peter	TI-S, Senior Advisor, Business Principles for Countering Bribery, based in UK	M	UK
Boswell, Nancy Z.	TI USA	F	USA
Heller, Nataniel	Global Integrity, Director. TI, Indvidual Member	M	USA
Vogl, Frank	TI, Co-founder and IM	M	USA

Annex 3:
Milestones in the history of Transparency International (TI) as a movement

1993	TI is established in Berlin under German law with a small Secretariat.
1994	The Organization for Economic Cooperation and Development (OECD) members adopt recommendation to criminalize foreign bribery. The **Integrity Pact (IP)** concept is developed and tested on refinery rehabilitation project in Ecuador. IPs have since been used in numerous projects around the world. The Summit **of the Americas** puts corruption on the public agenda and calls for hemispheric approach.
1995	TI publishes first **Corruption Perception Index**, (CPI) raising public awareness around the world and triggering competition to improve country rankings
1996	OECD adopts **recommendation on tax deductibility of bribes to foreign public officials**, urging member countries to consider denying the tax deductibility of bribes. Members of the Organization of American States (OAS) adopt the **Inter-American Convention against Corruption (IACAC)**, the first regional anti-corruption convention. The first edition of the TI **Source Book** is published providing practitioners with a systemic approach on fighting corruption
1997	The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (OECD Anti-Bribery Convention), committing to enact and enforce laws prohibiting bribery of foreign officials is adopted by 34 countries.
1998	Promoting Revenue Transparency, first report is published
1999	**OECD Anti-Bribery Convention** enters into force with countries accounting for almost 80% of world trade, criminalizing foreign bribery and ending the tax deductibility of bribes. TI publishes first **Bribe Payers Index**, ranking countries by propensity of their companies to pay bribes abroad. **Council of Europe** concludes the Civil Law Convention on Vorruption and the Criminal Law Convention on Corruption.
2000	TI facilitates joint anti-corruption initiative by major international banks, leading to the adoption of **Wolfsberg Anti-Money Laundering Principles**. TI launches the **Integrity Awards** to recognise the courage and determination of the many individuals and organisations fighting corruption around the world. TI publishes the revised **TI Source Book** (now translated into over 20 languages) which argues the case for a "National Integrity System", a holistic approach to transparency and accountability and embracing a range of accountability pillars, democratic, judicial, media and civil society.

2001	The first ever **Corruption Fighters' Tool Kit** describes 27 anti-corruption tools and is used ever since.
	TI releases first annual **Global Corruption Report**, exploring corruption around the world in 12 regional reports and examining global issues.
	The **National Integrity System (NIS)** country assessments are introduced which provide a comprehensive analysis of the anti-corruption provisions and capacities in a country, including recommendations for key areas of anti-corruption reform. 70 of such studies have been conducted since, many of which have contributed to civic advocacy campaigns, policy reform initiatives, and the overall awareness of the country's governance deficits.
2002	TI publishes model **Business Principles For Countering Bribery**, setting benchmark for corporate anti-bribery programs.
	TI awarded **Carl Bertelsmann Prize** for innovative coalition-building, and the media tenor agenda-setting award for focusing international media attention on corruption.
2003	The **United Nations Convention Against Corruption (UNCAC)**, signed by 140 countries, provides a globally agreed, comprehensive blueprint of reform.
	TI publishes first **Global Corruption Barometer**, reflecting how corruption affects everyday lives in 48 countries.
	Extractive Industry Transparency Initiative (EITI) launched, establishing multi-stakeholder program for increasing revenue transparency in energy and mining sectors.
	Asia Pacific Economic Cooperation (APEC) leaders endorse **Transparency Standards** for eight specific areas relating to trade and investment to be implemented by 2005.
	The first **TI Advocacy and Legal Advice Centres (ALACs)** were set up in Bosnia & Herzegovina, Macedonia and Romania.
2004	UNITED NATIONS declares December 9 as **International Anti-Corruption Day**.
	UN Global Compact adds "businesses should work against corruption in all its forms, including extortion and bribery" as a tenth principle.
	TI facilitates development of **Partnering Against Corruption Initiative (PACI) Principles** by **World Economic Forum** anti-corruption task force. Chief executive officers of more than 125 major multinational companies have since agreed to a zero tolerance policy and the principles.
	The **World Bank** agrees to first mandatory anti-bribery bidder certification requirement for large-scale projects.
	Asia-Pacific Economic Council (aPEC) leaders issue the APEC Course Of Action On Fighting Corruption And Ensuring Transparency, and a ninth "transparency standard" relating to government procurement.
2005	The United Nations Convention Against Corruption (UNCAC) enters into force.
	TI publishes first **Progress Report On Enforcement Of The OECD Anti-Bribery Convention**, highlighting the need for vigorous and consistent enforcement.
2006	The African Union Convention On Preventing And Combating Corruption And Related Offenses enters into force.
	Establishment of **WIN, Water Integrity Network;** TI hosts the Secretariat

2007	The World Bank adopts its Governance And Anti-Corruption Strategy. The **World Bank** and the **United Nations** launch the **Stolen Assets Recovery Initiative (StAR)**, to help developing countries locate and repatriate stolen assets. The **Asia-Pacific Economic Cooperation (APEC)** agrees to model anti-corruption codes for business and public officials. TI issues the **G8 Progress Report**, assessing G8 Implementation of their commitments to anti-corruption and good governance and calling for the G8 to report on their progress.
2008	G8 issues an Accountability Report: Implementation Review of G8 On Anti-Corruption Commitments, assessing progress on anti-corruption commitments, and commits to report annually.
2010	**TI** publishes together with the Revenue Watch Institute **The Revenue Watch Index** which rates countries according to the information that they disclose on the oil, gas and mining industries, including revenue payments, contracts and regulations with The UK's new **Bribery Act** is passed into law More than 40 ALACs established across the globe. TI has about 90 accredited national chapters

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