



Partnership for Transparency Fund

“Citizens Against Corruption” programme

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Governance and Transparency Fund*

Mid-Term Review

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Glossary of Acronyms

ADB	Asian Development Bank
ASYOUSED	Association for Youth and Sustainable Development (Cameroon grantee)
BPL	Below Poverty Line
CA	Credibility Alliance
CAC	Citizens Against Corruption (the DFID-funded PTF programme)
CSO	Civil Society organisation
CUTS	Consumers' Union Trust Society (Indian NGO and PTF grantee)
DFID	Department for International Development
ELBI	Evelio B. Javier Foundation Inc. (Philippines grantee)
FONTRA	PTF regional programme in Latin America
G-Watch	Government Watch (Philippines NGO and PTF partner)
GTF	Governance and Transparency Fund (of DFID)
IACC	International Anti-Corruption Conference
IGI	International Governance Institute (Cameroon NGO and PTF grantee)
M&E	Monitoring and Evaluation
MBC	Makati Business Club (PTF country partner for the Philippines)
MDG	Millennium Development Goal
MTR	Mid-Term Review
NGO, INGO	Non-Governmental Organisation, International NGO
NREGS	National Rural Employment Guarantee Scheme (Indian safety net)
OH	Overheads
PAC	Public Affairs Centre (PTF country partner for South Asia, based in Bangalore)
PDS	Public Distribution System (Indian system of fair price shops)
PTF	Partnership for Transparency Fund
PCA	Project Completion Assessment (independent evaluation)
PCR	Project Completion Report (submitted by grantees at close of project)
PRIA	Society for Participatory Research in Asia (evaluator of Indian projects)
Rs.	Indian Rupees
RTI	Right to Information (Indian act on public access to information)
VfM	Value for Money

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1. Executive Summary

Citizens Against Corruption (CAC) is a project of Partnership for Transparency Fund that provides grants and technical assistance to civil society groups in developing countries that are fighting corruption and promoting good governance in public services and institutions. PTF already has considerable experience in this field and is becoming seen as a leader in social accountability. DFID's Governance and Transparency Fund (GTF) gave PTF a £2 million grant to enable it to provide 70+ new grants during 2008-12, ensure these partners achieve demonstrable reductions in corruption, and disseminate widely the lessons of their experience.

PTF operates as a “virtual organization” without permanent offices, and its personnel are very largely volunteers. One of its key strengths is the advice to partners offered free by this team, which is highly valued by its grantees.

The Mid-Term Review (MTR) was conducted over a 6-month period and included interviews with PTF principals; field visits to Philippines, India and Cameroon to interview grantees and other stakeholders and see the CAC work on the ground; a survey of grantees conducted by internet; a review of PTF and grantee documents (including a sample of project proposals, completion reports and evaluations); and participation in the 2010 International Anti-Corruption Conference in Bangkok for discussions with grantees, donors and others. In these ways, the MTR has been able to engage with over three-quarters of the CAC grantees.

To date, CAC has been on track in identifying likely grantees and working with them to design small scale and often very local projects to tackle manifest examples of malpractice in the public sector. Many tackle the modes of corruption that most impact on the lives of poor people. It has provided grants and technical assistance so far to 44 CSOs and the evidence to date is that almost all of these are performing well. In other social accountability programmes progress is often described in terms of identifying poor performance or “raising awareness” of governance issues. CAC is able to go further and point to *specific reforms* triggered by the projects. This is partly due to the very specific problems targeted and the careful guidance offered, but partly also because PTF emphasizes “constructive engagement” – hence structured and non-confrontational dialogue with officials is integral to the approach. Through this, “reform champions” have emerged who have helped secure the beneficial changes.

The main MTR conclusion is its confidence that the CAC programme represents high value for money, impressive innovation, and valuable support to civil society in fighting corruption. It is difficult to envisage a programme that more closely fits the stated purpose of DFID's Governance and Transparency Fund. The MTR affirms that CAC is having a strongly positive impact, exceeding what can reasonably be expected given the scale of its funding. The substantial – often dramatic – benefit that can derive swiftly from its small grants is a success story worthy of wider telling.

Aggregating the impact of the many CAC beneficiaries is difficult, however, partly because the problems tackled and the country contexts vary so greatly, partly because impact is often intrinsically very hard to attribute and quantify, partly because the grantees' skills at documentation and analysis vary greatly and partly because of a paucity of baseline data. PTF is exploring a more common monitoring framework and giving clearer guidance to grantees on baseline preparation for the next cohort of projects. Nevertheless, just taking a few projects where direct savings can be listed, it is evident that the immediate financial savings alone are worth much more than the GTF grant. On top of this there are other benefits such as community empowerment, new structures for citizen vigilance, reformed bidding processes etc – all of which ensure that improvements will be sustained. And grantees are contributing significantly to changing the culture from one of grudging acceptance of corruption as a way of life to a public antipathy and a demand for change.

Combining citizen's investigation and vigilance, community mobilization, constructive engagement with public bodies plus eliciting the support of "reform champions" provides a formula that is effective in addressing the problems of corruption that are experienced by ordinary people. PTF has a commendably efficient business approach, is ready to test new mechanisms to realize efficiency and other improvements. Its finance system is very sound in its emphasis of probity and cross-checking. PTF has kept its overheads costs to a minimum by its reliance on voluntary advisors, however we suggest it is now time to consider expansion of these costs, if possible, in order to more adequately finance networking, communications and field travel of advisors in order to give more hands-on support to grantees and to disseminate more effectively the lessons of experience.

The MTR also finds that there are significant hurdles to overcome in particular as PTF has expanded the number of projects it supports and countries it works in, possibly at the expense of focus. The tasks of management, quality control and coordination are clearly becoming more difficult, and PTF increasingly has to supplement the contributions of its volunteers with paid services. In particular, PTF is forming partnerships with major local NGOs to manage country or region-wide groups of grantees. This has been successful in India, home to one third of the CAC grants. This pattern should be further expanded. The MTR is confident that PTF has made good progress in strengthening CAC and other programmes and that its revised approaches and procedures (as set out in its Strategic Plan 2010-14) will yield further strengthening.

While there have been disruptions to some projects due to external factors and one project was cancelled due to doubtful performance (in Congo) the major external shock has been due to exchange rate movements. Most PTF expenses and grants are denominated in dollars and hence, with the decreased strength of sterling, the GTF grant has in effect lost \$800,000 since the time PTF applied for the grant. Since many costs are fixed, PTF has had to reflect this loss largely by reducing its grants. The other unintended consequence, reported by some grantees, is that reform champions in public bodies are prone to being transferred elsewhere by their rent-seeking bosses.

The programme focus is highly pertinent, and it stands to benefit poor people in particular since they are most affected by the basic public services and safety nets probed. Reforming the governance of these services has emerged as a clear PTF comparative advantage. There are clear signs that the grassroots structures formed will also be durable after funding ceases and that promoting stronger local demand for good governance triggers a “virtuous circle” of enhanced vigilance and community confidence.

The business processes PTF uses (sometimes resulting from DFID and other donor instructions) can be quite daunting for smaller CSOs. Grant applications, reporting and other requirements could be made easier without loss of quality or probity, especially if greater use were made of country partners.

Although PTF accepts that projects seeking to change policies and attitudes are *complex* and require flexibility, its processes and relations with grantees sometimes give a different impression. It should more clearly indicate its readiness for flexibility and should emphasize to grantees the need to adapt to circumstances. Given that it is not realistic to expect significant change in corruption in a single year, the MTR asserts that it is timely, especially with tried and tested partners, to move to multi-year grants. It would also enhance impact if there were greater focus of CAC both in terms of the issues tackled and the countries worked in, with strategies articulated for the context and programme in key countries. Both the above points are in keeping with PTF’s latest Strategic Plan, providing PTF’s own funding is assured.

While progress so far demonstrates what small groups of committed citizens can do to clean up public bodies, the next stage is to use this experience more strategically to press for systemic change. While this happens to some extent in Philippines and specific projects with a national focus, elsewhere more could be done to foster networking amongst grantees and deepen their links with national reform actors. It could also do more itself to disseminate the experience of what works and hence contribute more fully to global best practice in social accountability. This calls for more attention to issues of communications, sharing experience and encouraging grantees to help strengthen each others’ capacity in advocacy and other skills. This area has been PTF’s weakest card to date. It should now make a strong effort to become a networking organization as well giving the support it does.

Other concerns voiced by grantees related to slow PTF decisions, disruptions in funding and sometimes a feeling of isolation. They would also like more chance to learn from experience of other grantees, more help in research and advocacy, and help in approaching other potential donors. By reviewing its volunteer strategy, making small changes in its processes, giving more attention to communications and networking and delegating more to country partners, PTF could readily address these issues.

Throughout the report the MTR makes various suggestions for strengthening the CAC programme and for addressing some of the deficiencies observed. These recommendations (including some to DFID) are précised in the Summary of Recommendations at the end of the report and are not repeated here, but one point –

directed to DFID – deserves emphasis. Many of the improvements suggested will only be possible if funders (particularly DFID) are prepared to provide more resources for core operating costs, including travel, communications and networking so that more direct support to grantees and more effective dissemination is possible.

While we hope that PTF will carefully reflect on this report's recommendations and adopt many of them, the programme as it stands is impressive in terms of impact, efficiency, sustainability and value for money. Hence continued GTF funding should not be conditional on PTF's decisions in this regard.

The MTR hence recommends that the programme continues as is.

2. Introduction to “*Citizen Against Corruption*” Programme

Partnership for Transparency Fund (PTF) was started in 2000 to explore, support and promote new modalities to meet civil society’s demand for good governance. Improved governance - greater accountability, responsiveness to citizens and transparency and honesty in the use of public resources - is seen as critical to achieving improved development outcomes. Convinced that the key to promoting more honest and accountable government lies in fostering a strong local demand for better governance coming from civil society, PTF seeks to promote CSOs piloting innovative ways to persuade public agencies and governments to improve their accountability and reduce corruption.

PTF is a not-for profit corporation registered in New York State consisting of 25-30 Members who elect a Board of Directors and appoint a Board Chair. The Board in turn appoints new Members as needed, a President, Secretary and Treasurer and various committees to help manage its business. All positions are subject to fixed terms.

PTF provides grants and technical assistance to Civil Society Organizations (CSOs) that work to improve transparency and accountability of public agencies. PTF seeks CSO grantees that are in the front line in generating an internal demand for better governance. PTF supports projects that give voice to civil society, demonstrate the value of constructive partnerships between government and civil society, and result in capacity building through action learning. PTF recognizes that for civil society to play a key role in holding governments accountable to their public, CSOs must be, and be seen to be, financially independent both from government and from other powerful vested interests, including the major donors and international financial institutions. PTF grants help make this possible because it is independent, represents no vested interests whatsoever, and is a minor player posing no threat to public authorities, while its core Members and Advisers are highly experienced persons with extensive international backgrounds. Therefore they are respected by the public authorities in question.

Citizens Against Corruption is a 4-year programme of PTF that is financed by DFID under the Governance and Transparency Fund (GTF). It is intended to support some 70 direct action anti-corruption projects implemented by partner CSOs in poor countries during 2008-2012, providing both small grants and technical support. As of February 2011, CAC is being implemented in 16 countries in four continents with 40 CSO grantees. These projects largely focus on improving local public service delivery and local public institutions through specific time-bound actions that aim to curb corruption through sustainable governance reforms and the direct monitoring of public services and transactions. PTF, essentially an internet based international CSO, uses highly experienced volunteer governance specialists to advise on project design and grant management. It is working both with its existing CSO partners and identifying competent new ones. It emphasizes actions that have identifiable impact and is disseminating lessons learnt, thereby helping build CSO capacity to fight corruption. Finally, it is

testing an innovative model in which experienced senior volunteers help strengthen CSO capacity.

3. Mid Term Review Methodology

The evaluator worked collaboratively with PTF to agree the methodology and develop a detailed evaluation plan. The key elements of the MTR were:

- A review of PTF reports, a sample of grantee CSOs' project proposals and log frames, project completion reports and where available project completion assessments.
- Survey of CAC grantees – either as a “hard copy” (Word document) and an on-line questionnaire (using “Survey Monkey”), and analysis of the returns.
- Interviews with key stakeholders
- Interviews with selected grantees
- Visits to Philippines, Thailand (to meet grantees attending the 10th International Anti-Corruption Conference), India (including Karnataka, Orissa, Madhya Pradesh, Rajasthan and New Delhi), Cameroon and (briefly) Kenya.
- Participation in the IACC Meeting in Bangkok in November 2010 where the PTF sponsored a workshop on corruption in police and judicial bodies in various countries; this enabled further interviews with CAC grantees; and
- Collation of evidence and stories useful for both evaluation and communication work.

Annex 5 provides a fuller schedule of the MTR and Annexes 3 and 4 detail the interviews held and main documents reviewed in the course of the evaluation.

4. Mid-Term Review Findings

In the following sections the MTR uses the format prescribed by DFID. Each section includes various recommendations which are then summarised in Section 6. It should be pointed out that a number of recommendations tally with PTF's own reflections and intentions as set out in its Strategic Plan for 2010-14

a) Relevance

CAC largely comprises grants to CSOs for activities combating corruption and promoting good governance plus technical assistance, capacity building and networking relating to these activities. Applications for grants are considered covering the following activities:

- Monitoring public procurement and sale of public assets

- Monitoring public agency activities related to transparency and accountability in public service delivery
- Public expenditure tracking & strengthening financial accountability systems
- Promoting transparent government
- Contributing to the drafting and implementation of anti-corruption legislation and regulation
- Media campaigns and the strengthening of investigative journalism to expose corruption and promote transparency and accountability
- In India, PTF puts special emphasis on grants related to two public schemes: PDS and NREGS, reflecting three project features: constructive engagement, community engagement and peer learning.

Most CAC grants have been awarded to organizations that are tackling the type of malpractices that impact on ordinary citizens, especially the poorer elements (and particularly regarding the governance of public services). While larger scams usually attract more media interest, the cumulative impact of these pervasive smaller-scale malpractices is much more damaging towards society and to development. One CAC-financed survey of an Indian city found that 82% of citizens pay bribes in order to access public services to which they are entitled.

The most confident finding in this review, therefore, is the very strong relevance of the PTF-CAC support to civil society. It is difficult to envisage a programme that more closely fits the stated purpose of the GTF i.e. to “help citizens hold their governments to account through strengthening the wide range of groups that can empower and support them.” (DFID website). Furthermore, the 2006 DFID White Paper *Making Governance Work for the Poor* recognises that a key to promoting more honest and accountable government is fostering the demand for better governance coming from within a country. Programmes such as CAC are ideally placed to provide the tools, institutional arrangements and confidence for enhancing this citizen demand for better and more transparent governance and this increased demand is indeed leading to positive, concrete outcomes (such as securing people’s employment benefits and entitlements).

Although two countries visited in the course of the MTR are no longer active DFID programme countries (Philippines and Cameroon), elsewhere CAC is clearly very much in keeping with DFID country priorities. For example in India DFID’s Senior Governance Advisor (Peter Evans) spoke of DFID’s priority for working with civil society to improve public services – which is the primary target of CAC in the country. This is not to say CAC could not be strengthened and made even more effective in protecting vulnerable people from the impact of corruption. As several interviewees suggested, PTF-CAC could usefully contribute more fully to the state and national level policy debates on governance matters through supporting relevant organizations and activities (a topic discussed more fully below).

It would also be useful for PTF to have a broader approach to country programmes that more fully reflected the country context. It might be a good discipline for PTF to prepare a brief strategy note for its programme countries (especially where there are multiple

grants). Such notes could include a profile of corruption in the country, a sketch of civil society activities in the field, a statement of PTF interest and comparative advantage, and hence the range of project it might support. Clearly this would require more investment in strategic planning which in turn requires recognition from DFID and other funders that resourcing this is important, and not part of overhead costs to be minimized. Furthermore, having such country strategies should not deter supporting excellent proposals in other fields of activity, should they arise.

While most projects reviewed appear very worthwhile a few address topics that seem rather peripheral. For example in Cameroon one partner is tackling corruption in two local authorities through an innovative participatory budgeting process (very important in the context of decentralization in the country) and another tackles corruption in universities – which is opportune in that today’s students will become tomorrow’s leaders, and hence it is important to gear them up for fighting corruption, and given the presence of a reform-minded minister for higher education. However another project addresses corruption in football; while this is an important topic in Africa, the particular approach focuses largely on corruption within minor league football teams).

b) Impact

In its GTF Inception Report, PTF spelt out that the intended focus of the CAC programme was to “assist CSOs to demand greater honesty, accountability and responsiveness from its public officials” and to achieve this through emphasizing:

- *Focus*: concentrating sharply on specific abuses;
- *Constructive engagement*: locating and seeking the cooperation of key influential officials and public agencies sympathetic to the CSO’s cause;
- *Transparency*: CSO monitoring to make transactions as public as possible;
- *Persistence*: sustaining effort and building up pertinent local CSO capacity over time.

The above provide a good framework for assessing the impact of CAC activities and whether these lessons are followed in practice. To this list we add a further topic, however – namely *Adaptability*.

i.) Focus:

CAC grants do indeed focus on very specific instances of corruption. The experience shows that such activities lead to much more concrete outcomes – in terms of identified and corrected malpractices, improved services and strengthened institutions – than would be the case with more general anti-corruption campaigns. The following box illustrates such concrete outcomes. The public services most targeted by CAC comprise national social safety net schemes in India, education services (in Cameroon, Moldova, Indonesia and Philippines), health services (in India and Nepal), the police and judiciary (in Uganda and Mongolia); and land and forests (in Nepal and Rwanda).

Box. 1 Concrete outcome of CAC activities in India

a) National Rural Employment Guarantee Scheme (NREGS). This safety net is intended to guarantee 100 days per year of employment at the minimum wage to all poor people in rural areas. In practice, many people are not given the job cards needed, have to pay a bribe in order to get work, get paid well-below the minimum wage, are paid very late, or there is widespread corruption due to the prevalence of fake job cards. Several CAC partners have tackled these issues and some (who did baseline surveys at the outset) are able to document improvements as a result:

- those getting work rose from 48 to 88% of the target population in one project area and from 40 to 98% in another;
- fake cards in one project area fell from 2100 to 1250;
- the number of days of work given rose from 30 to 60 in one project area and from 31 to 52 in another;
- in one project area the number of beneficiaries rose by 460 while 840 fake job cards were eliminated;
- in two project areas the average wages paid rose from 35-50% of minimum wage to 90%; and
- the delays in getting wages fell in one project area from 60 to 20 days.

b) Public Distribution System (PDS): Another safety net consists of a network of “fair price shops” at which poor people who have a “Below Poverty Line” (BPL) card are entitled to buy monthly rations of basic foods at well below market rates. However many poor people have not been able to get their BPL cards while many non-poor have acquired these cards. Also, PDS shops often only offer substandard food and do not open as required. Many CAC partners have tackled these governance failings with the following results:

- In three schemes 14,796 people have been able to get BPL cards as entitled;
- In one project 95 fake cards were eliminated (although this is politically difficult);
- PDS shops offering substandard food fell from 44% to 26% in one project area;
- Shops opening the correct number of days rose from 10 to 60% in one project;
- Shops allocating the correct range and weight of items rose from 50% to 85% in one project area.

Comment: PTF has an intermediary for the CAC programme in India (the Public Affairs Centre, PAC, based in Bangalore). PAC is now trying to introduce a common framework for project monitoring and is training CAC partners in this and in conducting baseline studies so that in future it will be easier to quantify such outcomes.

CAC projects usually have a strong geographic focus which also tends to make impacts more tangible and broadens citizen support for the activities (since people more readily see themselves as stakeholders in local programmes from which they are supposed to benefit compared with national programmes in which their interests are less tangible).

The third area of focus concerns the tools used; CAC partners tend to use similar tools and strategies (particularly procurement monitoring, use of freedom of information laws, expenditure tracking, and social audits) even if focusing on different sectors. This could imply clear benefits could be derived from capacity building and networking arrangement that concentrate on building the skills needed for the effective use of these tools. While this is the case in India, and to some extent in Philippines, it is not yet the case elsewhere because in most other countries there are only one or two PTF partners. The opportunity to seek synergies and mutually beneficial cooperation between partners is diminished by the thin geographic coverage of PTF, including its CAC programme. This is changing now, and will do so further, given the commitment in PTF's 2010-14 Strategic Plan to focus most of its effort on a limited number of country programs while always being open to support a few particularly innovative proposals coming from other countries.

Grassroots experience can contribute powerfully to debates on governance challenges¹ in ways that are empowering to CSOs – a connection that PTF could assist. For example, PTF advisors assigned to advise grantees might act as a connectivity conduit in disseminating their experience and information to wider CSO audiences and advising them on entering the national/state policy debate.

A valid question arises about what is the comparative advantage of PTF in countries where programmes are largely grassroots, especially where national partners handle most of the programme management. Might it be better for PTF to stick to supporting innovations in national governance systems (where its advisors have special skills to offer) and leave supporting grassroots anti-corruption work to others (such as international NGOs with strong presence in the country)? There would be a strong logic to this, if there were indeed many INGOs supporting this kind of work. But at present there aren't. While some, such as Action Aid, Ford Foundation and Oxfam do support this type of work, they do so largely with existing partners rather than offer it as a special "product line". There is a clear gap in the funding market for effective grassroots level work tackling the type of corruption that affects ordinary people, because this field isn't as glamorous as fighting high profile national scams. The arguments for PTF not only continuing but actually expanding this type of work are:

- Systemic but low-level corruption affecting ordinary people has a cumulative impact that is orders of magnitude higher in terms of lost national development potential than the major national corruption cases and this usually has a much more serious immediate impact on the poor;

¹ To illustrate - the pioneering by the NGO MKSS of social audits in 20 villages in Devdongari Block, Rajasthan has triggered a national policy requiring social audits in all NREGS schemes.

- In advocacy and policy-making, organizations that have specialist focuses make greater impact than generalists; for example International Budget Project in the field of public spending, Article XIX in freedom of information legislation, International Center for Not-for-Profit Law in laws relating to civil society, and Global Witness or Publish What You Pay in the governance of natural resources. PTF is emerging as a “market leader” in the tackling corruption in the delivery of public services and this deserves to be built on;
- By concentrating in this specific field, PTF is well placed to be the node for international sharing of experience regarding the efficacy of different approaches and the constraints;
- The nature of this work leads to serious threats of reprisal against individuals and organizations, especially due to the power asymmetry between corrupt officials and grassroots activists; by being well connected with high-level people in governments, donors and public life, PTF is able to afford a strong degree of protection from such threats, and with concentration could do more.

PTF should endeavour to ensure that more systematic use is made of its partners’ experience to shape national policy, through encouraging the partners to work in national or sub-national networks, to share their experience proactively and to use PTF’s own web of contacts to connect partners with research centres, national advocacy groups, reform-minded officials etc who could make good use of their grassroots experiences. Without this, the result may be an undue emphasis on *local-level* corruption rather than the upstream factors that typically drive it. For example, malpractices by local authorities may in part be due to the unchallenged tradition of giving backhanders to high level officials. In India (its most grassroots-oriented programme) PTF has demonstrated the effectiveness of social auditing to curb corruption and should now be more bullish in assisting local NGOS to move up the administrative chain to tackle the systemic governance issues that allow the abuses to take place at the village level, seeking the best partners for this.

The conclusion, therefore, is to draw on PTF’s inherent strengths where these are appropriate but also to cultivate new strengths required to give even better service to grassroots partners, since this is a vital segment that few other than PTF currently addresses as a distinct “product line”.

ii.) Constructive Engagement:

A distinctive feature of PTF’s approach is to require its partners to adopt the strategy of engaging constructively with relevant officials, elected representatives and public bodies. Many projects illustrate the benefits of such collaboration. For example groups in the Philippines have been able to use their good relations with officials to get access to procurement documents and bidding processes, thereby identifying where there is collusion or other malpractice. And IGI in Cameroon has been effective in reducing corruption in the University of Buéa by working with the university’s management committee, rather than positioning itself solely as an independent watchdog. In some parts of India, the Food Inspectors responsible for monitoring the workings of the Fair

Price Shops (see Box 1) have often come to see CAC partners as important allies in some districts and they are able to work together to ensure the shops abide by regulations.

While CSO collaboration with a public body can lead to outcomes that are greater than each by itself could expect to achieve, the “constructive” principle should not be taken too far. Many officials have done everything possible to thwart social accountability activities and have resorted to threatening behaviour towards some CAC workers. In very polarized settings it may be difficult for a CAC partner to find a public entity that will cooperate, especially overtly (although in such situations a special premium attaches to *any* official who is a reform champion). Many CAC partners have found it necessary to “name and shame” corrupt officials or to organize various forms of public protests. While PTF hasn’t blocked such strategies, they don’t sit easily with the principle of constructive engagement. In Philippines grantees informed the MTR that they found it caused delays and difficulty to meet PTF’s requirement of getting signed documents from the relevant public bodies committing to a partnership. Seeking to formalize the engagement may also go too far for reform champions, perhaps courting over-exposure and personal reprisals. This is not a significant problem providing the principle is adhered to as an aspirational goal rather than a bottom line.

iii.) Transparency

CAC partners have been extremely effective at enhancing the transparency of public services and bodies. In some countries (such as Indonesia, Liberia and India) they have helped make budget processes more transparent and responsive, and have often been creative in using national freedom of information laws – pushing the boundaries for the benefit of ordinary citizens. CAC partners in India, for example, have filed over 600 requests for information under the Right to Information Act, and have persuaded some public bodies to routinely make information available, *suo moto*, rather than wait until it is requested. Many groups have also made transparency more effective by educating the public about the power of that information or use of mass media.

PTF could enhance transparency further by urging its partners to share more widely their experience and their data, especially with CSOs and networks campaigning or conducting research at national levels. CAC partners are often grassroots actors with limited experience at more elevated levels. Conversely, many of the strong national advocacy groups or independent research institutes lack strong grassroots links. A stronger symbiosis might result from encouraging outreach on the part of partners. This already happens to some extent. For example Indian partners link up with the national “Right to Food” Campaign or with state level anti-corruption networks, and partners in Philippines join the Philippines Procurement Network and link up with others in similar fields. However PTF has not emphasized such outreach to date. It tends instead to concentrate on its bilateral relations with partners. It should be stressed, however, that

many PTF grants are themselves national in scope², and these have largely resulted in substantial achievements.

iv.) Persistence:

While the review finds that CAC scores highly in the other dimensions of “impact”, it is a stretch to say that the programme “sustains effort” and “builds up pertinent CSO capacity” over time. While CAC partners are united in their respect for PTF, its advice and its support, a common lament is the insecurity posed by grants being restricted to one-year programmes. Groups in India who at first understood (perhaps wrongly) that they could expect funding for a 3-year programme then learned that their grant would cover just the first year at the end of which they could apply for a “second phase” funding, if the first year had been successful. In practice the 2nd phase applications were only accepted after their first phase project completion reports had been submitted and evaluated. In other words, PTF treats the application as a fresh project rather than continued funding for a multi-phase project. This leads to a hiatus between the phases (compounded by the requirement that CAC partners undergo accreditation by the Credibility Alliance, discussed later) in which the project momentum stalls, and in some cases staff critical to the activities are laid off.

It must be stressed, on the other hand, that PTF is a rapidly growing organization with a rapidly growing base of partners. Hence many CAC grantees are new to PTF and it is a good discipline to avoid long-term commitments until they have had a chance to show their mettle. A better balance needs to be struck, however. Especially where PTF has long-standing partners, as in the Philippines, PTF should introduce multi-year grants (and the MTR is pleased to hear that PTF is now considering moving in this direction). To do this without risking its own sustainability, however, it needs assurance of continued support from its own funders. In particular, the MTR hopes that DFID will be able to assure highly effective GTF grantees of continued DFID support at least one year before the end of the current GTF term.

PTF’s impact regarding building up CSO capacities might be greater if it could reduce the number of countries in which it works and perhaps reduce its base of partners so that it can offer more intensive support. Concentrating on fewer countries (which is envisaged in PTF’s Strategic Plan 2010-14) and guaranteeing funding over a longer time-frame would greatly contribute to the important attribute of persistence.

v.) Adaptability and Flexibility: Log-frames or Straitjackets

This report raises concerns about overusing complicated business processes, especially in the project design. The MTR recognizes that the apparent trend in this direction stems in good part from donor requirements (not least DFID’s GTF manager’s own insistence). The MTR concern partly centres on the capacity of small and

² Such as TI-India’s promotion of integrity pacts, DELNA’s monitoring the construction of Latvia’s National Library, lobbying against corruption in a major road project in Trinidad, promotion of the FOI Act in Sierra Leone, election monitoring in Ghana, and judicial reform in Mongolia.

inexperienced grantees to handle this without detracting from their activities on the ground. But it is mostly due to questions about whether a design approach that encourages minutely planning of all project details from the outset is the right way to go, and whether fostering an adaptive approach might be more appropriate.

The familiar project logical framework evolved as a result of donors' experience with large projects. In building a large dam, for example, experience dictates the myriad issues to be addressed, in which order, and what to do if any of them go awry. There is a growing body of literature³ that questions whether the *linear planning* of such large, technically difficult but otherwise relatively predictable projects applies well to projects that seek to change attitudes, policies, institutional behaviour and so on. The latter may be much smaller scale but less predictable and valuable opportunities may be lost by trying to make them seem predictable. The field has been termed *complexity theory*⁴ and it draws on both physics (chaos theory) and management science (systems thinking).

In linear projects general experience confirms that various defined inputs would allow a set of activities to be conducted, culminating in certain outputs which would have reasonably predictable outcomes and hence impact. In seeking to change attitudes, systems or institutional culture one can plan *activities* (using the right inputs) but one can only *hope* that these generate desired outputs – but then only time will tell whether these lead to the goal of change. If it is the *goal* that is most important, the most effective way of reaching it is to closely monitor systems, public opinion and institutional behaviour – watching for opportunities (and seize them when they arise), or spotting mounting resistance (and push at different doors if the obstacles are getting tougher). Complex projects are non-linear, incremental, operate within a web of interconnected systems, are two-way and must seek “tipping points”, quickly capitalizing on them when they arise.

An advocacy project for a given reform is a good example of a complex system. It cannot be looked at in isolation of other actors (such as government, other CSOs and public mood) and while a clear route-map should be sketched at the outset, this should be constantly adjusted as circumstances change. When a project approach is mutually agreed between PTF and a grantee this should be seen as an initial trajectory which has to be changed if circumstances change. However there is an asymmetry in that the grantee is more keenly aware of those changes (because they are in their face) than their PTF counterpart. Hence PTF may (albeit unwittingly) exert pressure on the

³ The best summary of this is Overseas Development Institute's Working Paper No, 285 of October 2008 - *Exploring the Science of Complexity: Ideas and Implications for Development and Humanitarian Efforts*.

⁴ A distinction is drawn between “complicated” and “complex” projects. Building a dam is certainly complicated but those with the right training can achieve it with relatively high success rates. Raising a child, in contrast, is *complex* because there are no failsafe manuals and no certainty that given inputs will realize success. A linear project (for which the log-frame is ideal) assumes that systems are ordered, the environment is a constant, and that change can be calculated from inputs. A complex undertaking needs a basic framework of norms but beyond that adaptability to circumstance, addressing multiple factors at the same time – each of which impacts the others, and recognizing that results will be unpredictable.

grantee to keep to what was agreed rather than do the smart thing – adjust to circumstances.

It has to be said that PTF is highly responsive, prepared to be flexible and has a good relationship with grantees – but the MTR suggests that it could do more to embrace flexibility. If CSO pressure leads to possible policy shifts there will be resistance from those who lose rent-seeking opportunity or who resent “outside interference”, even if the nature of that resistance can’t be predicted. As a “known unknown”, the CSO must be prepared to modify its approach as the threat manifests. If there is no resistance then it is likely that the project is achieving little impact. Hence deviating from the log-frame (for good reasons) is a sign of success, not failure, PTF guidelines to advisors do emphasize flexibility but the very detailed agreements reached with grantees gives the opposite impression.

NJMO in India received a grant to monitor and challenge malpractice in two central government safety nets. Before it started work, however, there was a major flood locally and the state government adopted a relief and reconstruction programme that was manifestly corrupt. NJMO immediately started applying the participatory approach it had envisaged to the flood programme instead and asked, and subsequently gained, PTF agreement to delay work on the safety nets. There were some quick improvements in the flood programme and this significantly increased the communities’ confidence in campaigning for their rights. Given that the ultimate objectives are to ensure poor people get their entitlements and community empowerment, it might have made better sense for PTF to have simply switched the focus of the project. Had the CSO not been able to find the resources for the additional activity it might have lost this important opportunity and the flood programme would have been less effective. (The MTR has been informed that NJMO never made a request to switch the finding purpose but it is worth exploring whether the formal agreement signed with PTF deterred the NGO from making such a request).

Clearly PTF is right to insist on a disciplined approach. It cannot give grants just for whatever activity the grantee feels right at the time, and it has important fiduciary responsibilities to ensure that a grantee is soundly managed and has properly kept accounts. Project proposals are carefully vetted and much effort is made by PTF advisers to assist grant applicants to improve project design. However PTF may need to increase its appetite for flexibility, and ensure that grantees are notified of the importance of adaptation. Clear project plans (including results frameworks and even log-frames) are useful aids even for grassroots NGOs but they should be used flexibly, not as straightjackets, and PTF should communicate this flexibility to its partners more clearly.

vi.) Concluding comments on impact:

This review, in keeping with independent evaluations of PTF in 2005 and 2008, is confident that CAC projects have a strongly positive impact, exceeding what can reasonably be expected. The social, economic and political consequences highlighted

in the grantees' documentation (in particular in their Project Completion Reports) reveals very clear and tangible benefits, going well beyond identifying governance problems and "raising awareness". Where these projects have been subject to independent evaluation, these benefits have been largely confirmed. The substantial – often dramatic – benefit that can derive swiftly from such small grants is a success story worthy of wider telling.

The beneficiaries are, overwhelmingly, poor citizens and those dependent on public services. In the long-run, the public sector also stands to benefit as CAC activities can elicit greater job-pride and more efficient public service. Some public servants interviewed in both India and Philippines confessed that at first they were not favourable towards the planned CAC activities (seeing them as making extra work), but they have come to see them as catalytic, achieving much more than they had thought possible and more beneficial in improving state programmes than the reforms they could have achieved by themselves. In the Philippines this related to efforts to clean up procurement processes and in India to Food Inspectors' efforts to hold Fair Price Shops to account.

c. Efficiency

Being largely run by volunteers and being highly cost-conscious when it comes to travel, running offices and other expenditures, PTF is highly efficient in a budgetary sense (see 4f for a fuller discussion of this topic). This section discusses the efficiency of the management approaches, PTF's use of advisors, grantee relations, networking, the finance system and risk management. The conclusion is that PTF has a commendably efficient business approach, is appropriately always testing out new mechanisms to realize efficiency gains and is open to ideas on improvements but that there are significant hurdles to overcome in particular as PTF has expanded the number of projects it supports and countries it works in, possibly at the expense of focus.

A general observation here, which also applies to other sections, is that it is not appropriate to look at the GTF-financed CAC programme in isolation of PTF's other activities. The GTF grant is one of PTF's funding sources (albeit currently the largest), and the activities supported from other funders are broadly similar and in some countries (such as Philippines) the PTF draws on multiple funding sources, not just GTF.

i.) Management Approaches

PTF uses three management approaches for its CAC programme in different countries:

- *One-on-One Partnerships*: in which PTF works directly with grantees in particular countries via a designated PTF voluntary advisor and regional coordinator. (Most countries where there are 1 or 2 grants)
- *Regional Partnership*: in which most management responsibility is delegated to a carefully identified partner for the region. (This applies to the South Asia region, in which the Public Affairs Centre in Bangalore manages relations with

16 CAC-financed partners; it also applies to PTF's collaboration with FONTRA in South America's Southern Cone countries, which is not GTF-funded.)

- *More modest Country Programme approach:* in which a local partner is appointed to help PTF manage the country programme but where PTF retains most responsibility. (This applies in Philippines and Uganda).

The appropriateness of these approaches depends on the size of the country programme and the availability of PTF (voluntary) advisors with the capacity and skill-set required – a topic discussed more fully below. However, PTF has found, and the MTR would agree, that the regional approach is more problematic as it sacrifices the advantages of local country knowledge and proximity. PTF's current focus on concentrating on establishing country programs supported by a local partner seems sensible, while allowing for the option of supporting a few highly innovative projects as one-on-one partnerships in some other countries. This implies establishing more formal country programmes in Cameroon, Uganda and Kenya.

For one-on-one partnerships this is likely to be the case where the grantee is known to be trustworthy, has adequate capacities to be a "self-starter" without hand-holding, and there is a PTF advisor who has relevant experience to offer and can maintain reasonably frequent contact. This is well reflected by CAC-financed projects in Latvia and Lithuania, for example.

A strong country partnership will be preferable where there are many grants, the handling of which is more than can be expected from PTF volunteers, and where the selected partner has a more relevant skill-set for the country programme. This is certainly the case in India, where PAC largely handles the PTF programme – which primarily addresses the local implementation of two specific national safety net schemes. Most grants are for grassroots-level work in which PAC has more experience than most PTF advisors; PAC is much better placed to provide the capacity building and operational advice needed and to foster networking. For such grantees, PTF advisors may not be able to add much to the input and oversight of PAC. On the other hand, some Indian grants are state or national in scope or considerably broader and have benefited from PTF (rather than PAC) advice. For example, Transparency India is promoting the use of integrity pacts for procurement in the power sector nationally, and CUTS in Jaipur uses the Right to Information Act to address corruption in rural development very broadly. These two grantees are outliers in India both in their approach and scale of organization. What is important is to avoid duplication or contradictory messages which can be the case where both a national partner and PTF adviser feel responsible for advising and monitoring the same grantee.

A more modest country programme approach (compared to that in India) is desirable in smaller countries where there are multiple grants and/or where a reasonable degree of routine guidance and oversight is desirable. This is clearly the case in Philippines where there are many PTF grantees (including, but not only, from the CAC programme) and where the routine management load is significant. Each country programme (as

PTF now envisages) needs custom built arrangements that are appropriate for the specific country situation. In general, as PTF expands it will become increasingly necessary to contract national partners both for grantee management and for coordination and experience sharing, since a local CSO partner will be better placed for this than a volunteer (especially one who only visits the country occasionally).

Such partnerships currently emphasize processing grants and help in developing new proposals. They could usefully be expanded to give more attention to outreach, providing grantees advice on improving implementation, disseminating lessons of grantee experience, fostering networking amongst grantees and with other CSO actors engaged in comparable activities, communications and outreach, perhaps meeting some training needs and advising PTF on refinements to its country strategy. In particular, the partners could make special effort to engage grassroots CSOs with novel ideas who lack access to other donors.

Whether full-scale or more modest country partnerships are used, it is good practice to ensure a separation between grantee selection processes and project evaluation so that the partner is not engaged in both, to avoid conflict of interest.

ii.) *Use of advisors*

Perhaps the clearest feature that distinguishes PTF from other INGOs is its very strong reliance on volunteers who are extremely experienced and highly skilled in various development fields – most being retirees from the World Bank or other international agencies. Currently PTF's only paid staff are the Chief Operating Officer, Program Associate and Finance Manager – all on a part time basis – plus occasional consultants paid for specific purposes (such as website design). PTF currently lists 30 “Members” and a network of over 30 voluntary advisors. These advisors act as unpaid consultants to PTF and (particularly) to its grantees. If these services were budgeted at anything approaching a market rate, the technical assistance of PTF would greatly outweigh its financial assistance. Interviews of grantees during the MTR affirm that they are in general very grateful for this advice and find it useful in the design and execution of their work. They find their advisor reliable, quick to respond and a friend, as well as a free consultant.

There are, nevertheless, questions about the use of volunteers that it is timely for PTF to consider. Their use heightens PTF's efficiency overall but problems can arise. While they demonstrate strong commitment to advising grantees on their anti-corruption projects, they often have much less enthusiasm for the administration, communications and networking functions – as is only to be expected. Some important activities have consequently been rather neglected. Moreover some grantees, due to the nature of their projects and the PTF management model in the country concerned, have derived less benefit from their advisor and look instead to their peers or to the national PTF partner for support. The message to draw is that advisors add undoubted value in some settings, but less so elsewhere and hence their use should be adapted to the context (to maximise efficiency for both advisors and grantees). There may be too many advisors

in a country like India where there are almost as many advisors as grantees, where the projects are largely grassroots and where there is a strong country partner.

In general the comparative advantage of PTF advisors is that they have deep understanding of the main governance issues, have good connections at high level in government, and have experience of large and complicated (rather than grassroots) projects. They mostly do not live in the grantees' countries. In reviewing PTF's volunteer strategy, the challenge will be to maximise the use of their strengths and to seek to recruit new advisors with skill profiles that fill existing gaps.

In the ideal world, PTF advisors would be highly experienced in the specific field a grantee is concentrating on, and would advise all grantees working in this same field. In this way they would be able to help build knowledge in the field and share experience between grantees and others globally or regionally. With volunteer advisors, who typically support just one or two projects, this isn't always feasible and so different ways must be taken (see next section).

Another limitation is that advisors only have the chance to meet their project teams face-to-face infrequently. Their interaction is mostly based on the exchange of emails and discussion about documents. This is not ideal, particularly for groups who are more familiar with oral traditions than the written word and who are not fluent in English. This may skew the PTF-grantee dialogue more to the formal documentation than need be the case – yet what is most important is what is *done* rather than what is written. Experienced and large grant-makers such as Oxfam ensure frequent direct contact with their partners to reach agreement on the grant purpose and then help the partner to write it up where need be. While increasing face-to-face contact will not be easy for PTF (due both to budget pressure and the limited time advisors can offer for field trips), two suggestions are offered. One would be for advisors to have more telephone contact with grantees (especially through skype) in order to build up a closer understanding of what they seek to do, help them find resolutions to problems arising and build rapport. The second is to give special attention to grantees who find the proposal and report writing daunting by (a) going easy on the written expectations – accepting email-style reports rather than formal quarterly reports, and not requiring detailed log-frames etc (PTF has emphasized this flexibility itself, it should be noted); and (b) actually helping the grantees in the drafting – rather than just giving feedback on draft documents.

In addition, it would be good to establish a travel schedule discipline in which advisors routinely notify PTF of travel plans, such that PTF can consider whether the trip might be adaptable to be of use to grantees. Physical presence of advisors in a country can help the grantees improve their projects, but can help in other ways too. Grantees are often frustrated with trying to get key officials to be cooperative, and sometimes expose themselves to risks when officials object to their work. Having a senior PTF advisor visit can be invaluable in opening doors and in offering protection. For example, the visit to Cameroon of a PTF advisor encouraged the Minister of Higher Education to attend a grantee's launch event, which not only made it a higher-profile event but engaged the

minister to the extent that he has since followed up to press all universities to install mechanisms to counter corruption.

iii.) *Grantee Relations*

PTF enjoys very good relations on the whole with its grantees and, as one would expect, a strong degree of gratitude for the support. There were some concerns expressed by grantees in the course of this review, however, which indicate areas of potential efficiency gains.

The most common concern of smaller grantees, especially those not so fluent in English, was the complex nature of the application, reporting and completion report processes, which many find daunting. Over time, PTF's requirements for grantees has become more and more complex and its "Guidelines to CSOs" for the CAC programme runs to 31 pages (but is now being simplified). Part of the growing complexity is that each donor has its own bureaucratic requirements which may not be adjusted accordingly for the size of the sub-grant in question. DFID's own requirements are very detailed, including the use of logical frameworks. These can be easily handled by large CSOs used to grants from international organizations, but prove extremely difficult for grassroots CSOs, especially where their managers have limited English language skills. Simpler processes should be explored for them.

The second most frequent concern relates to funding discontinuity or uncertainty. This is because PTF at present largely makes 12 to 18 month grants, even when it is clear that the overall project goal will take longer to achieve. PTF does indicate its willingness to finance follow-up phases with known partners, but while this sounds close to a multi-year grant agreement, in practice it isn't. Subsequent funding applications are generally considered after the prior phase is finished, a completion report has been filed and reviewed by PTF, and perhaps an independent evaluation conducted. Funding gaps of 6 months or more between phases can arise, in which grantees have either to seek alternative funding, maintain activity without paying salaries, or lose momentum. A multi-year funding agreement would still require evidence of good performance for subsequent tranches to be released but the NGO is able to plan on the basis of assured funding and the default would be to release those tranches unless a valid concern arises, hence ensuring momentum is not lost. (PTF has advised that this funding discontinuity has only been a constraint in India, where unclear delineation between the roles of PTF and PAC and communication glitches can lead to delays. While this may be true, grantees elsewhere have emphasized to the MTF that moving to multi-year grants would be a great improvement.)

The explicit adoption of multi-year grants (perhaps restricted to existing partners) would be a powerful addition to PTF's arsenal. For these grants external evaluations would be conducted at the end of the final phase, not at end of phase 1. While it is a good discipline to press grantees to gather evidence of reduced corruption, this is difficult to do in a short timeframe. Grantees also need advice on how to measure this impact (and it is appropriate that a PTF M&E working groups has been set up for this).

The problem of funding gaps has been compounded in India by the decision to *require* all grantees to get accredited by Credibility Alliance⁵. In practice CA doesn't have the capacity to handle the volume of applications it receives and PTF grantees have found it takes many (often very frustrating) months to go through the process. It is inappropriate that grants are held up in the interim, as has been reported by some grantees.

Some grantees interviewed during the MTR commented that their other funders have rather simpler business processes, did not require such detailed budgets or complex matrices of actions and results etc at the application stage, offered training in how to follow their business processes and required simpler and less frequent progress reports. Others, however, (especially repeat grantees) consider PTF processes to be simpler than other donors they encounter.

iv.) Networking – the goal of PTF becoming a networking organization

A key strength offered by programmes operating in multiple countries is the opportunity they afford to share experience across those countries, hence building up a global knowledge bank on their focal topic. This has not yet been fully developed by PTF, although its management recognizes its importance. Clearly PTF will be able to do little with its own limited resources to promote face-to-face exchange of grantees, so it must inevitably concentrate on fostering networking through IT.

The temporary deficiencies of its website which is being redesigned is discussed elsewhere but when operating at full steam PTF should consider adding a self-managed “corner” for partners to share their experience or post requests for help. This might be most efficiently managed if all grantees are asked to list what governance topics they work on, whether using PTF or other funds. This information could be used to generate pages in the partners’ corner in which grantees would describe very briefly their activities on the given topic (with links to fuller information) plus any observations or requests for help. PTF volunteers could be invited to act as “talent scouts” uploading in this corner information from social accountability practitioners beyond the PTF orbit. There would have to be a “health warning” in this section of the website to say that PTF doesn't guarantee the quality of information and that organizations cited are not necessarily PTF grantees.

PTF advisors would themselves find this useful. If advising a project in a given field they would quickly be able to look up what other partners are working in the same area and help make connections. For example PTF partners in Moldova, Cameroon, Indonesia and Philippines are all working on curbing corruption in the education sector but as far as the MTR could tell none knew of the others. Likewise PTF partners in various countries (including Ghana and Cameroon) monitor elections, without

⁵ CA is a network of some 3000 Indian NGOs which has set up to establish and police high standards of governance amongst NGOs. To get accredited (and accreditation can be at different levels for large, small and new NGOs) NGOs have to open their books and go through a rigorous review by a certified CA assessor. Accreditation is increasingly seen by donors as a hallmark of fiduciary reliability.

knowledge of each other. And ASYOUSSED's project in Cameroon could benefit from knowledge about the pioneering governance work arising from large-scale community-driven development projects elsewhere.

v.) *Finance System*

PTF's finance system is highly sound, rigorous and largely dependable. It emphasizes probity and cross-checking. The main question raised in the course of the MTR is one of possible *over-caution*. Every PTF payment requires the go-ahead of 2-out-of-3 on its Management Committee (MC – all are volunteers). At a time where more than one are travelling or busy elsewhere, delays can result – as has been the experience reported by a few grantees. This is a rare concern, but perhaps a contingency arrangement is desirable (such as having 2 reserves in the MC, or permitting payments with just one signature in the event of the other two being unavailable).

vi.) *Risk Management*

The risks described in PTF's GTF application identified two main and three lesser risks. The main risks related to government obstruction and weak partner implementation. The mitigation strategies envisaged: (a) ensuring as fully as possible that relevant public authorities agree to the intervention or commit to support it and (b) that there is careful partner selection, and strong PTF technical input and oversight. While (b) makes clear sense, it is possible that (a) is over-done. PTF correctly emphasizes the principle of "constructive engagement" but, as described in 4.b (ii), it will not always be possible to find a reform champion or any public servant who will cooperate when vested interests or rent-seekers are threatened. Indeed, obstruction by civil servants of CSOs' activities can be a measure of their effectiveness, not just a risk to be avoided. Also, while collaboration with public bodies is undoubtedly an effective strategy it is not the *only* strategy, and at times public demonstrations or confrontational approaches must also be used. It would be more appropriate to seek all possible avenues for constructive engagement rather than require it at all times (as in the Philippines programme); risk aversion is not an appropriate risk management strategy.

The lower order risks PTF identified were: not being able to sustain PTF's volunteer effort; not being able to mobilise sufficient funds from other sources and not being able to identify enough good projects. There is no sign that these risks are impacting the quality of the CAC programme, and the mitigation strategies set out have been adequate – however PTF is increasingly concerned that fund-raising is proving very difficult.

d.) Effectiveness

Careful attention to M&E and regular reporting makes it relatively easy to assess individual PTF grantees' performance. A programme evaluation in 2005 of 29 projects concluded that 86% had achieved all or most of their objectives. MTR's review of

grantees' Project Completion Reports and independent evaluations by third parties and PTF advisors all indicate a similar level of grantee performance. At this level it can be concluded that the CAC programme is strongly effective. However it is less easy to provide aggregate data on the reduction of corruption that CAC has occasioned because the project foci and performance indicators vary so greatly – as does the approach to progress monitoring. India is the partial exception in that 10 of the 14 partners are monitoring governance of two national safety net schemes, and because the coordinating partner (PAC) is introducing a common monitoring framework.

There are a number of impressive project results. Individually they provide anecdotes of success but collectively they amount to a clear narrative. Combining citizens' investigation and vigilance, community mobilization, constructive engagement with public bodies, plus eliciting the support of "reform champions" provides a formula that is effective in addressing the problems of corruption that are experienced by ordinary folk.

Hence the MTR confidently concludes that, in the first 2 years of CAC, PTF has had a good track record of achieving the outputs and results set out in the CAC log-frame. This is discussed in tabular form in Annex 1 (Achievement Ratings). In terms of outputs, there has been considerable effort and creativity in developing new tools and approaches for tackling corruption, but limited progress in ensuring that grantees "share their experiences with others in and outside their countries".

Please note – there are two versions of this Annex, the second using a revised log-frame, as advised by the GTF manager in KPMG (Mike MacDonald's letter to PTF of 17 August, 2010). In particular he advised revising CAC's logframe in order to better measure outcomes attributable to the implementation of the GTF-funded programme. He suggested that that *"there would be merit in combining the purpose statements and making sure that the indicators at purpose level are all measurable as the programme progresses. There should be several outputs which contribute to the purpose. He also stressed that the link between the budget spent on activities, the outputs (changes as a result of activities) and purpose should be more obvious."* The PTF Management have proposed a revised logframe, responding to this advice, which is used in Annex 1b.

While it is important to seek to identify and where possible directly measure the impact of the anti-corruption activities supported by PTF, as discussed in this report it is often very difficult, if not impossible, to attribute outcomes to activities in a complex political and socio-economic situation where there are many actors and many influences, never mind quantify precisely their impact. It is, however, possible to make an informed judgement, based on a good knowledge of the local context and a balanced assessment of the achievements of each project, as to whether a project has been effective in contributing to reducing the level of corruption. This may be sometimes directly measurable in terms of stopping corrupt activities. In other cases it may be a question of whether a certain administrative or institutional reform has been adopted or a new law has been enacted or even in some cases whether awareness of peoples' rights to monitor public officials and challenge corruption where it is found.

In order to assist in assessing whether the program overall has been successful in achieving its goal of reducing corruption, this MTR agrees that it should be possible for PTF to rate each project's outcomes and impact on a scale from 1 to 5 based on the project completion reports, staff visits and the independent project completion assessments. PTF would need to establish simple yet clear criteria on which to base a project's rating and each rating would need to be fully justified in a short note summarising the evidence used and the reasons for the rating. While this approach is rough and ready, when the ratings are aggregated across a large number of small projects, it should nonetheless result in a fairly solidly based assessment of the outcomes of the overall programme that could be independently audited.

The rest of this section probes the effectiveness of PTF-CAC's approach, its partnerships and its country programmes and asks how the programme could be made more effective in the future.

i.) How effectively have CAC's ambitions been realized?

Although PTF has held important workshops and conferences in a number of countries, amongst the CAC programme countries only in India have these been regular and intended for capacity building as opposed to ad hoc, when PTF personnel (including the MTR evaluator) visit, and only rarely has PTF enabled international sharing of experience (such as the PTF workshops offered during the International Anti Corruption Conference every 2 years and the annual CIVICUS meetings). Obviously the cost of financing international travel to attend such events is the limiting factor, and it would not be appropriate to draw either on project funds or PTF administrative budget for this purpose. However it would be timely for GTF to maximize cross-fertilization and for that reason DFID might consider initiating a bursary scheme within GTF to finance its beneficiaries' travel to take part in particularly relevant workshops or for exchange visits and their dissemination costs.

PTF has to date had a weak communications strategy and its website remains very out of date, with very little material available on CAC experience. PTF principals point out that this is a result of a website redesign process which proved problematic and that they hope to rectify it shortly. Where experience has been shared internationally this is largely the initiative of the grantees themselves. This is not a strong criticism, since it makes sense to prioritize garnering good quality experience before disseminating it, but improving experience dissemination should achieve higher priority in the future. This again is an area where DFID could help through extra funding for dissemination.

Regarding CAC Activities (of which the log-frame listed three to be monitored: grant-making, capacity building and partnership formation) there are good results. The number of direct grants has grown to 40 (plus 4 repeater grants) for the CAC programme. This expansion has been achieved while maintaining selection quality and diligence in terms of grantee support and monitoring. This implies that the target of agreeing 70+ grants in the 5-year CAC timescale is about on track, providing repeater grants are included. There has been solid progress too in forging country/regional

partnerships. The one with PAC in South Asia has become deeper; the Philippines partnership is being reviewed and new partnerships are being explored in Uganda, Kenya and elsewhere.

Capacity-building has been largely successful in terms of support from PTF advisors, but, as is discussed above, has been somewhat weak in terms of fostering mutual support and exchange amongst grantees or tapping the experience of other social accountability practitioners in the country. The exception to this has been in India, where PAC has organized many thematic and state-level workshops as well as initiated a programme of peer review in which grantees spend time with a counterpart for mutual learning.

ii.) Making the partnerships more effective:

There has also been good progress in terms of developing national partnerships. The partnership with PAC has become very strong, and the MTR advises that even more responsibility could be delegated (see *iv.* below), although retaining direct one-on-one partnership in cases where PTF advisors have more to offer the grantee than the country partner, and restricting it to India (not South Asia).

The MTR evaluator had the chance to visit an organization doing similar work on safety nets that was also financed by DFID-GTF but through a different INGO (not PTF). While the CSO was doing excellent work, it clearly felt exposed and unable to tackle the higher-level corruption problems it came across, keeping its attention just on the lowest level of government (the Panchayat). It had little contact with others working on the same set of issues and its funder for this work had limited India presence. PTF grantees in India, in contrast, have been bolder in addressing the systemic issues, thanks both to mutual support mechanisms and support from PAC and PTF advisors.

It is now timely for PTF to enter comparable partnerships in other countries, recognizing that this would represent a commitment to polarize the programme geographically in those countries. PTF may well wish to retain its original thirst for innovation (able to support good ad hoc ideas wherever in the world they come from) but to supplement this with perhaps 5 or 6 countries or regions where there is a carefully constructed, coherent programme of multiple grants. The role of the coordinating partner would not just be quality control, capacity building and communications, but to make the whole greater than the sum of the parts.

iii.) Making the interventions more effective

Developing country and thematic concentration also enhances effectiveness. Currently in India there are 14 grantees clustered in Karnataka/Kerala and Orissa – most of whom seek to reduce corruption in two national safety-net schemes (see Box 1). It is clear that such concentration not only yields efficiency gains but also synergy and political gains. Having a number of CSOs using similar tools (such as social audits, “Right to Information (RTI)” requests, vigilance committees etc) to scrutinize important schemes

has elevated the attention of authorities and the media, has elicited support from key public figures (such as state-level ombudsmen and RTI Commissioners) and has deepened the confidence and mutual support amongst grantees.

Here the emphasis has been on making impact at the grassroots level. Box 2 lists some of the findings of corruption within national safety programmes in India that are emerging from the work of CAC grantees. These indicate the prevalence of high-level corruption, collusion and systemic abuse within these schemes. The grassroots projects of CAC grantees can undoubtedly do much to protect poor people in the project areas from some of this abuse (which is socially valuable, of course), but it is the view of the MTR and its informants that more could be done to use this local experience to influence wider changes in policy and practice. Others in India (such as the Information Commission, the Right to Food Campaign, prominent Delhi-based activists etc) are mounting increasing pressure for change – especially in light of the “2-G” telecoms scam and the rampant corruption surrounding the construction of the Commonwealth Games site. These reformers have influence on national policy-making but lack detailed knowledge of what is happening at the grassroots level, hence the need to be more proactive in connecting the grassroots experience of CAC grantees with those who have the potential to shape policy.

iv.) Fostering stronger country programmes

It is timely to expand the partnership in India further, encouraging PAC to give more attention to:- (a) helping grantees engage more fully with the community of anti-corruption CSOs at state and national level, especially those engaged in advocacy; (b) conducting (or fostering) research on the governance of the centrally sponsored schemes that CAC grantees are focusing on; and (c) working with grantees to evolve a stronger common reporting framework so that experiences in different districts are more readily comparable (this is already underway). This would elevate the anti-corruption work by a quantum leap, but would necessitate three commitments from PTF. Firstly, to continue funding the programme for at least 3 more years, otherwise the premium of this more systemic approach would not be realized. Secondly to expand the funding so that at least two new state clusters of grassroots work can be initiated (to ensure there is a more nationally representative base of experiences being dissected). And thirdly to commit more resources to the programme coordination aspects (rather than the grants) to resource these enhanced activities – recognizing that these functions need not all be met by PAC directly; it could commission others with relevant skills for key functions.

This would represent an evolution from the current design in which PAC is responsible for administration, quality control, routine communications with grantees and some capacity building to a new concept in which there is a holistic programme addressing corruption in safety nets, embracing grassroots activism, documentation, research and advocacy building on the solid achievements of the first two years.

Box 2. Some systemic Problems with India's Safety Nets Identified by CAC Projects

“Every service in India has an unofficial price whether it is getting a government job as a school teacher, a contractor getting a government contract, or drivers escaping from traffic violations. In India we have a number of poverty alleviation programmes that are meant for eradicating poverty and for development. Due to weak governance, corruption and lack of accountability poor people don't get their entitlements and the benefits don't reach the people.” (Indian CAC grantee, responding to the MTR survey)

- The issuing of “below poverty-line” (BPL) cards for access to fair price shops and other benefits is highly corrupt. In Karnataka the authority has issued 15 million household cards (including 9M BPL cards) while there are only 12 M families in the state and only about one third the population (4M families) are truly BPL. Moreover many non-poor have not bothered to get cards and many thousand poor people are denied cards, unless they pay a bribe.
- Panchayat leaders appoint “ghost workers” for the public work schemes under NREGS; the pay for this “labour” disappears; even honest Panchayat leaders admit to giving kick-backs to every tier of local government in order to secure funding for the public works their communities need and are then made to doctor the books to cover the tracks.
- The delivery mechanism for the PDS shops is riddled with errors from the food corporation of India down to the local warehouses, such that a high proportion of the PDS funds disappears and poor people fail to get their entitlements.
- In all the safety nets there are fake people getting benefits on paper and poor people denied benefits unless they pay bribes.
- The public works schemes often benefit local elites rather than serve priorities of the ordinary people in the community; there is clear collusion between the local elected leaders, vested interest groups and block/district level officials
- It is estimated that up to 40% of funds for centrally sponsored safety-net schemes is currently being lost due to corrupt practice. Karnataka is estimated to lose \$200M/yr from the PDS (fair price shops) scheme alone; and 57% of the food provided doesn't reach the poor.

Some CAC grantees identifying such systemic problems consider the problems beyond their scope but others are turning attention to seeking allies to help tackle them (such as the State Ombudsman, reputable journalists, retired honest District Collectors and academics).

e.) Sustainability

If GTF funding were to stop at the end of the 5-year grant there are feasible options for continuing the CAC programme. The hope is that PTF will secure grant-funding from new sources. PTF's reputation is solid and it is becoming a recognized leader in a field that the development community regard as of increasing importance. Although the GTF grant supports a group of PTF partners collectively referred to as the CAC, in effect this is just a selection of PTF's global programme; in other words CAC's distinctiveness is the funding source rather than the operational approach. Hence shifting to new funding sources would be relatively seamless. This said, the funding environment is becoming

increasingly tight and donors tend towards financing existing partners or new initiatives, rather than finance existing programmes that have been supported by other donors. For this reason, it is very important that DFID finds a way to provide on-going support after 2012 to GTF partners such as PTF that have clearly demonstrated effective, relevant, cost effective and innovative programmes, otherwise some of the benefits GTF has achieved may be lost.

An approach that national partners might take, such as PAC in India or MBC in Philippines, would be to raise funds directly (such as from donors or private foundations). DFID India see this as a distinct possibility, and perhaps the pragmatic way forward would be to have a stronger partnership in that country in which PTF and PAC jointly fundraise for the CAC programme since some donors will prefer to link with an Indian NGO and some with an international one.

Having demonstrated impressive results (as the majority of CAC grantees have done) makes it easier for those grantees to approach national funding sources for grants (including foundations or international NGOs operating in the country).

While there are strong arguments for fresh external funding after the current GTF grant finishes, the most impressive element of the sustainability story is the resilience of the local-level endeavours. The following – a distillation of messages from CAC grantee feedback from the MTR survey – are good reasons to be confident that the local-level work of CAC would continue to a reasonably strong degree even if there were no further external funding. :

- *The virtuous circle of voluntary effort:* as citizens mount activities that are effective in identifying and addressing problems of corruption they become more confident in their own capacities, gratified at the improvements in the local situation or the punishments meted out against offenders, more trusting of the NGO that supports them and hence more prepared to commit effort to future action;
- *Proven effectiveness of social accountability tools:* in widely differing settings, familiar tools have proved effective, including attitude or experience surveys, community report cards, social audits, filing right to information requests etc. Together, such tools also enable poor (often illiterate) people to become the producers of information for the first time. Careful monitoring permits them to move their experience of corruption beyond anecdote to hard data;
- *Resilience of local structures:* CAC activities has led to the creation of local structures for tackling corruption, including Social Watch Groups, service watchdogs or monitoring committees, forest or water user groups etc, and sometimes leads to the inclusion of grantees' representatives into local governance structures. This generates stronger conduits to feed grassroots experience into local-level decision-making.

- *Support networks are emerging:* some grantees have established networks that link together these new local structures to provide mutual support and experience sharing; elsewhere grantees are joining wider civil society networks to encourage wider impact of their work; this helps to replicate the anti-corruption measures;
- *Strong local leadership:* the local structures have also helped to surface new cadres of grassroots leaders, especially amongst women and youth, who have a zeal for expanding this type of work;
- *The power of constructive engagement:* most groups report great difficulty initially in reaching out to any official but increasing ease in the rapport as the groups demonstrate their commitment to constructive engagement and the rigour of their evidence. Many groups have come to establish regular engagement with key public bodies and have been gratified to find sympathizers within those bodies who will go out of their way to help;
- *Community contributions to costs:* some (but still the minority) of groups report that the new local structures are levying community contributions towards the costs of the social accountability activities, such as membership fees. While these may cover local costs (such as for conducting surveys or travelling to meet officials), there is no sign as yet that these contributions will cover the costs of the NGO that supports their activism.

PTF might usefully document more fully the above trends so that they are better placed to advise their partners on how to maximise sustainability.

Box 3. Illustration of Sustainability – Textbook Watch in Philippines

Government Watch has been scrutinizing the printing and supply of textbooks to schools for several years, with PTF funding and together with the Boy Scouts movement. Due to citizens' vigilance, many examples of malpractice have been identified and stemmed (including the loss of 40% of textbooks during the distribution process). As a result, the cost per textbook has been reduced by an impressive 55% (resulting in savings of about \$1.8M/yr) and the average time taken from agreeing a textbook to actual delivery to schools has been reduced from 24 months to 9 months.

After several years of this programme, the gains have been consolidated. Government has agreed to new processes including unbundling of the textbook cycle into three separate contracts (for preparation, printing and delivery) and this is working much better. Even the printers prefer the simpler bidding process. G-Watch now feels it can leave this issue with relatively light CSO monitoring, at least for now, and shift to monitoring the much large school building and school furniture supply.

f.) Value for Money

Programmes that largely comprise small grant-making are inevitably intensive of administration, especially in the case of multi-country programmes. Skimping on these

items is false economy as it leads to uncertainty as to how effective the grants are being used. Similarly, M&E must be budgeted for reasonably. In the case of PTF these costs have been kept impressively low, without risking poor grantee performance, for these reasons:

- Most senior PTF personnel (advisors, evaluators etc) are volunteers, largely retirees from the World Bank and other development agencies;
- Conscientious efforts are made to reduce travel costs by piggy-backing on trips made for other purposes and that are funded by others;
- PTF is very cost-conscious in its expenditures, e.g. regarding its travel policy;
- PTF is close to being a virtual organization, with no significant office costs;
- Each item of spending has to be approved by 2 out of 3 in its finance committee;
- In its programme countries, PTF similarly reduces admin costs by selecting grantees (and national partners in some countries) that have a high degree of volunteer spirit, are staffed purely by locals and have low overheads.

As a consequence, the CAC programme undoubtedly represents very good value for money. This can be illustrated by breaking down the £627,000 budget for CAC in FY 2010/11, as described in the following tables:

Spending Category	Expenditure, £,000	% of total budget
Grants	440	70.2
Evaluations	39	6.2
Capacity building	44	7.0
Regional partnerships	25	4.0
Management	58	9.2
Administration	21	3.3
TOTALS	£627,000	100%

The MTR also analysed the breakdown of CAC spending in the largest programme country, India (which accounts for half the CAC grants and over half the budget for capacity building and regional partnerships). The £280,000 CAC expenditure in India for FY2010/11 breaks down approximately as follows⁶.

ITEM:	Grants to grantees	Grantee project costs	Grantee Admin & OH	PAC cap. building	PAC admin & OH	Grantee + PAC admin & OH
% Budget:	86.4	76.8	9.7	7.6	6.0	15.7

The India programme is the most admin-intensive, partly because it is largely handled by PAC on a full cost basis (while programmes elsewhere are largely managed by PTF volunteer) and partly because it comprises a large number of small grants – which are more admin-intensive. Even so, the combination of PTF management and administration plus the administration and overheads of PAC (which could easily be

⁶ This analysis is based on combining the Public Affairs Centre budget for CAC together with the budgets for the 15 CAC grantees in India. PAC's 15% overheads has been added to the direct administration costs in this table and programme development has been added to capacity building

assigned as programme costs) plus the administration and overheads of grantees comes to 25.2%⁷ This is a commendable ratio and it would be a false economy to seek to reduce it – especially as a good proportion of grantee overhead costs represents strengthening the institutional resilience of those CSOs.

In other countries the ratio is likely to be in the range of 21-24%. Overall, therefore, about 70% of the GTF funds going to CAC end up used in programme countries for direct anti-corruption work and related capacity-building and networking, some 24% goes for management, admin and overheads (about half of which is used by grantees and regional/country partners) and the remaining 6% is allocated to evaluation and programme learning⁸. The Indian grantees used over half of the grant for direct costs of project activities as opposed to CSO personnel (which amounted to 37% of the grants) or capital costs (about 1%). This also is an indicator of diligence in ensuring good value for money in terms of programme outputs. In summary, the MTR cannot suggest ways to improve the current situation.

As its global programme has expanded, PTF's reliance on volunteers for *all* tasks becomes increasingly untenable, and for programme management it now needs a stronger core staff. DFID should regard financing this as a good use of its GTF funds. Some projects have been catalysts for improvements that are dramatic (see Box 4). It is false economy not to give such partners the strongest support possible or to skimp on the widest dissemination of their experience.

g.) Equity

The CAC programme tackles the everyday examples of corruption that impact ordinary people rather than the major scams that, when revealed, achieve higher profile in national and international media. Cumulatively, this corruption has a more severe development impact than the major scams and in particular have a more devastating impact on poorer segments of society.

Although PTF has not sought actively to inject an equity dimension into the CAC programme, for the above reason it is inherently skewed to the interests of the poor, in particular those most dependent on basic public services and state safety nets (the focus of much grantee attention).

At least in India and Philippines (where the MTR was able to probe this issue) women were strongly represented in the CSOs supported by grants, in part reflecting the fact that they are more likely to be directly affected by poor services and that they are less likely to be away from their communities for daily work.

⁷ This figure is not simply the 12.5% overheads for PTF plus the 15.7% for PAC and grantees because the latter sum applies only to the 81.2% of PTF-CAC expenditures that reaches programme countries.

⁸ This sum is higher than in other years because of the sum budgeted for the MTR.

Box 4. “Values for Money” – examples of major reforms obtained cheaply

In **Mongolia**, PTF’s partner successfully introduced a Code of Ethics for the judiciary and trained key people in its application. As hoped, the rate of bribing judges has been reduced steeply even though complaints are being more seriously processed. What wasn’t expected, however, is that the President would take notice and adopt all their proposals into his package of law reforms. Unfortunately (or not) he also poached the NGO’s law specialist to be his own advisor.

In **Philippines**, PTF’s partner sought to curb corruption in the national youth fund. With a \$28,000 grant it successfully identified and stemmed \$167,000 of corrupt or wasteful practices. Scaled up over the country this could lead to a savings of \$13M. More important is the cadre of young anti-corruption advocates it has spawned.

Also in **the Philippines** the close monitoring of hospitals’ procurement of drugs and other items by one partner (whose grant was \$33,500) contributed to a more genuinely competitive process and savings estimated at \$740,000. And a grassroots partner probing the use of vehicles by the local authority was able to yield \$270,000 in savings.

A number of CAC projects engaged youth particularly, including at least four grants that went to youth groups and four more grants that were focused on governance in the education and sports sectors.

Further grants addressed concerns of ethnic minorities and other forest dwellers (in Nepal, Orissa) or supported groups in areas where there were high percentages of ethnic minorities. As far as the MTR is aware, no projects particularly tackled issues of disability specifically, although disabled people and those afflicted by AIDS stand to benefit particularly by the improvements in health services and safety net delivery that is sought by many CAC grantees.

In conclusion, the MTR makes no specific recommendations regarding improvements in this area.

h.) Replicability

i. Can the CAC approach be readily replicated?

In the same way that the CAC approach is sustainable (see 4e. above) the MTR considers PTF to have used methods and styles of working in CAC that are readily replicable and effective in a wide array of settings. In particular the approach well demonstrates the powerful contributions that citizens’ groups can make to identifying instances of corruption or poor governance, assessing the damage thus caused (especially to basic services, poor people and the national purse), and engaging with officials in dialogue about correcting these problems. Such groups need help in the start-up stage for mobilization, sensitization, capacity building and the provision of tools (such as community report cards), and thereafter typically need reduced but on-going help – in particular advice in addressing problems encountered, networking, systematic

documentation etc. This help is typically supplied by a local NGO. Replicability could be deepened if PTF were to establish a program of South-South peer learning in which a CSO representative who had successfully implemented a project in a certain sector provides guidance to CSOs wanting to implement a similar project elsewhere.

Modest investments in well-motivated NGOs can yield impressive rates of return, demonstrating how under-catered for is the market for social accountability. To give just one example: the Indian NGO, Adhar, that works in the most backward area of Western Orissa focused for its CAC project on two national safety net programmes in one specific locality (8 panchayats in Loisingha block, Balangir district). One of the many issues it looked at was the prevalence of fake job cards, which provided local officials and elected representatives a ticket for corruption⁹. Through its survey Adhar estimates that there were 2100 fake cards. Through advocacy and dialogue with reform-minded people in government it was able to eliminate 840 of these cards. If each fake card was used to generate pay for 50 days of work per year for a ghost worker, then eliminating 840 of them will have saved about \$100,000 of corrupt spending per year for the NREGS scheme. Yet the CAC grant to Adhar was just \$17,600. At the same time Adhar was able to secure cards for 460 poor people who had previously been denied them and to double the average number of days of NREGS work per person (to 60 days per year). It generated similar reforms in the fair price shop scheme.

One only has to reflect that if such a high level of malpractice exists in an area of less than 10,000 families (i.e. about 0.005% of the Indian population), there is almost endless scope to replicate the CAC approach in India alone, with considerable social as well as economic benefit to the country. The Adhar experience corroborates the estimation of others that up to 40% of the funds deployed in the national safety net schemes of India is lost through malpractice. It would not be realistic, however, to think that 20,000 Adhar-type projects could be replicated readily, covering the entire country, since there just isn't the necessary skill-base to draw on. To consider the issue of replication it is necessary to reflect on which required skill-set is in shortest supply.

ii.) *What is the weakest link?*

The results of Adhar are notable not just because of the clear beneficial outcomes they have achieved in just one year, but because a small NGO in a remote part of West Orissa happened to have leaders who were able to carefully document the situation and write it up in English. These NGO *management skills* are rarer than the *grassroots skills* of community mobilization, local organization, and advocacy, yet it is the latter skill set that actually makes the difference on the ground. Fortunately it is both cheaper and quicker to build grassroots skills in a developing country than management skills

⁹ Each job card holder in rural areas is entitled to 100 days work per year on public works schemes as identified by the local council, or panchayat. This work, to be paid at the official minimum wage (currently about Rs. 100 per day), is usually very labour intensive (such as the manual construction of earth roads). There is often the collusion between local council leaders, block engineers and construction companies; the latter provide bulldozers and other equipment that can do the work very quickly and cheaply, and fake cards are used so that bogus payments to ghost workers is used to pay the construction companies as well as back-handers to the other parties.

(except under repressive governments). Hence it should be feasible to replicate the number of NGOs making profound improvements in local governance, providing those NGOs are not expected to document their progress in the same way as Adhar. Donors must be careful not to be barriers to social progress by devaluing grassroots skills relative to management skills, yet that is what in effect happens when they will only fund NGOs that provide convincing documentation in English.

The lesson from this is to go easier on grantees in terms of reports, matrixes, budget details etc required and indeed on the number of evaluations they are subjected to. An MTR observation is that many such reports within CAC do not appear to be used in practice, elicit no feedback and are not shared through the website. On the other hand, there is a great deal of good and innovative work being done that today's documentation doesn't bring out.

Donors do have a fiduciary responsibility to ensure good use of their funds, and are rightly careful to ensure good governance of their partners. It is important to find the right balance, however. This applies especially in areas where literacy rates are low and where CSO leaders are not fluent in English or in "donor-ese" (such as log-frames, risk matrices, minutely detailed budget plans etc). Some refinements to the standard INGO grant-making approach could make it better tailored to the context and hence achieve higher returns. PTF could consider a wholesaling approach in which it makes larger grants to a major national NGO (or state level NGO in a large country like India) which in turn selects committed local CSOs that have (or can readily build) the grassroots skills needed. The NGO would keep close contact with the CSOs to monitor progress but only require it to give narrative reports in their own language. The intermediary would help the group of CSOs it coordinates prepare their operational plans and progress reports and also conduct the surveys, impact monitoring and the other tasks that are beyond the scope of the CSOs.

In India consideration could be given to turning the existing partnership with PAC into such an approach, with PAC becoming the intermediary for a number of sub-grants rather than a coordinator for PTF of its South Asia programme. Under this approach, PTF would continue to provide funding and expert advice but would only require one set of documentation from PAC (not from the individual sub-grantees). It might be that one of the other large partners (such as CUTS) might also become an intermediary working with a set of CSOs in the Rajasthan-MP-UP area. PAC and other intermediaries could also seek funding (and indeed advice) from other sources. Such an approach would make more efficient use of the relative scarce NGO operatives who have modern NGO management skills.

In such an approach, one topic that PTF would have to keep an eye on is the transparency of the intermediaries and the strength of their relations with their grantees. The latter should be well informed of what are the intermediaries' responsibilities and budgets, so that they are informed of their entitlements.

iii.) Context

The CAC approach can be replicated in a wide range of countries where three contexts apply:

- *Freedom of association*: it must be possible to form CSOs relatively freely and to operate activities that are challenging to segments of authority without repression or serious threat to the CSO personnel. There is, unfortunately, a growing number of countries where governments are restricting associational freedom – in particular CSOs’ freedom to receive foreign funding. While the ostensible reason usually given is to enable tighter control of terrorists, in practice these controls are increasingly used to stem the activities and the funding of groups that are seen as critical of the regime or risk exposing the corrupt practices of public officials.
- *Officials are prepared to engage*: the CAC approach only works if at least some officials or elected representatives are prepared to engage with the grantees and will make available at least the minimum amount of information that is needed for them to do their job. In most countries where there is genuine competition for elected office and/or a modicum of press freedom there will be such officials and also reasonable numbers who are prepared to go further and help CSOs reduce levels of corruption (“reform champions”).
- *Widespread problems of low-level corruption*: if corruption is a minor problem to most communities in a country, the CAC approach will not yield a high dividend, and it would be better either to invest in strengthening traditions of professional investigative journalism (to tackle the occasional major scam) or to deploy the resources elsewhere. However, there are few, if any, poor countries with low levels of corruption.

5. Innovations

In its GTF application, PTF described four features of its design to be innovative and in the first two years of operation its CAC annual progress reports list innovations in implementation. This section reviews progress in this regard and the realism of the claims made.

i.) Innovations in design

The following is MTR commentary on the project design innovations described in PTF’s application for GTF funding.

- *Support for many local CSOs tackling corruption that impacts public services*: As discussed earlier, this is indeed an important innovation and PTF is well able to demonstrate how it has used the GTF grant for this. One could argue that this isn’t exactly *innovative*. Other INGOs such as Action Aid, Oxfam, International Budget

Project and others also provide local CSOs grants for social accountability purposes, often financed under the GTF programme. But what PTF can be justifiably proud of is the ingenuity demonstrated by many of its partners. Its grants have helped realize some of the most exciting innovations in this field including identifying and correcting corruption in the production of school text books, in procurement processes, in judicial systems, in drug trials, in safety net schemes and in sports, and experiments with integrity pacts and social audits.

- *PTF is a very nimble NGO using light but effective procedures:* The first part of this is unquestionably true; PTF has been able to grow quickly in terms of number of partners and volume of funds it handles without losing its edge. There is a question, however, over whether it can still be described as always using “light” procedures. As described in section 4.h., some of PTF’s bureaucratic requirements are quite daunting to many small CSOs. This is especially a problem for CSOs operating at the grassroots in India. It is clear, reviewing its guidance to grantees over the years, that its processes have become more complex and rule-bound over the years – seemingly drifting from its earlier more responsive, more ad hoc approach. Its “Partnering with the PTF: Guidelines for CSOs” now runs to 31 pages, and its draft Operations Manual for use in India stands at 61 pages – hardly hallmarks of “light procedures”. At the same time PTF has broadened from just partnering with the more sophisticated or elite NGOs (such as the Transparency International’s national chapters) to include more grassroots partners. It is difficult to square both trends, and for the latter it may be better to revert to the light touch (as appears to have been retained in PTF’s Uganda programme, where one of the grants is GTF financed). The dilemma in part stems not from PTF’s own wishes but from the requirements of its donors, not least DFID. Adopting a “wholesaling” approach (see 4.h.) might offer a way forward for grassroots partners.
- *PTF largely uses experienced volunteers:* This is very true and it is an important attribute of PTF, as well as a major source of cost efficiency. The volunteers are mostly very senior retirees of major international development agencies and they contribute a great deal of time and expertise to PTF for no payment. It is increasingly evident, however, that there are some tasks that its volunteers are less interested in and which are currently languishing – most notably fund raising and various administrative tasks. PTF’s communications strategy also seems to be rather behind. Given that a vital role that INGOs such as PTF can and should play is acting as an innovation broker, sharing globally experiences of what works locally, this is regrettable. Similarly, PTF is increasingly paying independent organizations (trusted local partners) to conduct Project Completion Assessments both to save on travel costs and because volunteers with relevant country knowledge are not always available to do them. There is, however, an ever-growing slate of PTF advisors, and the most popular task appears to be advising partners in the design of their projects. This can be very useful (as many grantees interviewed attested). But on the other hand there may be occasions where PTF advisors are over-used. Having 25 years of World Bank experience dealing with governments at high levels doesn’t necessarily mean someone has valuable advice to offer grassroots groups trying to

make their village council more effective. For some groups their only contact with their assigned PTF advisor is receiving comments by email on their proposals. In South Asia, for example, there are 14 PTF advisors assigned to advise just 17 grantees. It is timely to review the volunteer strategy to ask: a) what tasks are suffering due to limited volunteer interest and how best to fill the gap, and b) whether all the tasks volunteers do really add value. Rather than having one advisor per project, like a pen pal, it might be better to have one advisor in a region per focal area (such as fair price shops, procurement, integrity pacts or governance of health services) and have that advisor engage with all the groups working on that topic for a period (say two years) and then retire.

- *Operating as a virtual organization:* This is a success story for PTF. It manages a \$2M/year operation dispersed across the world and services a board whose 14 members come from 9 different countries all without an office, and largely using email and skype. On the whole, decisions are reached very swiftly. This lean presence and the smallness of PTF is a disadvantage for some grantees, however, (particularly smaller or new ones) since they cannot readily discuss their project with a PTF representative. They may experience several rounds of comments and revisions on their project proposal, whereas with other donors this can be sorted more swiftly.

ii) *Innovations in implementation*

We now review the following innovations in implementation that have been described in PTF's annual GTF reports.

- *Spreading successful experiences to other countries:* There are good illustrations of this, notably through the workshops and seminars PTF offers at international events such as the International Anti-Corruption Conference or CIVICUS World Assemblies. Moreover PTF's principals, when they travel, are conduits for this exchange of experience. But this is limited. It is clear that successful partner experiences are much more likely to be picked up by CSOs in the same country than abroad (as seen in India and Philippines). The exception is the FONTRA programme in Latin America (not GTF funded) where a regional partner deliberately diffuses experience regionally. In contrast, organizations such as International Budget Project and Article XIX do a good job in this respect, in part because they have a narrower niche and are clearly global leaders in their field. But part of the reason also lies in their greater emphasis on communications, outreach and maintaining an effective website – matters that PTF has rather neglected. Few CAC grantees, even, said they found PTF to be a useful source of information about experience in other countries. (The CAC page on PAC's website, however, may be more effective at disseminating experience within India; PAC estimates the site receives more than 5000 hits per month.)
- *Testing new delivery mechanisms:* The traditional PTF approach has been the one-on-one grants, with technical assistance provided by one or more designated

advisors to support the unique programme of the grantee. Now, PTF is experimenting with a cluster approach, deliberately seeking to have a number of grantees working on the same issue. Different modalities are used for this, including the partnership model of India, or the partial partnership of Philippines. The strengths and weaknesses of the different approaches have already been discussed, and recommendations offered.

- *Encouraging mutual learning and peer review:* In both India and to a lesser extent Philippines (the two countries with more than three CAC grants each), PTF has fostered opportunity for grantees to exchange experience and to help each other. This occurs most obviously in the national or state-level cluster meetings and thematic workshops, but an interesting new innovation is peer review exchange visits, so that grantees assess and provide feedback on each other's projects. Grantees in India have found this particularly useful not just because of the valuable ideas on improving their project that have been gained but also because of the affinity networks and social capital formed.
- *Emphasizing constructive engagement in the project design:* a hallmark that distinguishes PTF from other INGOs supporting social accountability work is its insistence on seeking constructive engagement. While this has usually proved effective (even in settings where advocacy groups are usually frustrated in their efforts to influence reforms), it is possible to overdo the insistence in this regard, as was discussed in 4.b.ii. Having said this, the MTR would advise keeping to the principle and encouraging (and perhaps helping) grantees to find forums for dialogue with officials – while not being slavish about it. Some grantees have also pointed out that the insistence on using the term “anti-corruption” as opposed to “social accountability” or similar can create the impression of confrontation and also grates with the public.
- *Experimenting with a common results framework:* PTF is deliberating a more common and rigorous approach to measuring results, so that it can better aggregate its global impact. This is methodologically difficult given the widely differing nature of country contexts and corruption problems tackled. But as the base of completed projects and grantee evaluations expands, it is a good time to explore possibilities. Progress will be easier in India, where most projects focus on the national safety net schemes, but even here it is unlikely to enhance the monitoring of the current cohort of projects, because most grantees did not conduct the sort of surveys during project inception that would provide the necessary baselines for common results reporting. The current reflection will be valuable for the next cohort of projects, but it must be remembered that many grantees lack the capacity for the survey work and indicator tracking that would be needed. It might be preferable to have PAC, or a trusted third party, work with the grantees to do all the baseline and tracking work on a given topic – to ensure more uniform reliability of data.

6. Summary of Recommendations

The following is a digest of the recommendations that derive from this review. Each recommendation is expanded in the relevant portion of section 4. While most recommendations are to PTF, we conclude with a few suggestions to DFID.

Recommendations to PTF on Programme Design

1. Introduce multi-year grants for established partners to enable longer-term planning. In asking grantees to predict outcomes, recognize more explicitly, that significant, tangible reduction in corruption will take a long time to realize and that there must be flexibility to adapt projects to changing circumstances. Alternatively, or in addition, make the process of follow-on grants as smooth and prompt as possible to avoid losing momentum or causing hiatus in funding.
2. Move to a more focused programme, concentrating on a small number of countries (ideally with a designated partner), albeit retaining the capacity for making grants elsewhere to support particularly innovative proposals. This report makes various suggestions for enhancing the roles of country partners (see in particular section 4.f.iv.). PTF should strive for greater country presence (even if just more frequent visits) in the focal countries and should prepare strategy notes to guide the programmes within the country context.
3. Where the goal is to support grassroots CSOs, consider moving from country *partners* (responsible for helping PTF manage the programme) to *intermediaries* – who would be PTF grantees that themselves make sub-grants to the grassroots CSOs.
4. Give more attention to upstream corruption: (a) helping grantees inject their grassroots experience into national debate wherever possible; (b) supporting networks that connect grassroots groups with national reform movements; and (c) advising grantees on engaging in the national policy debate.
5. Retain the principle of ‘constructive engagement’ but apply it flexibly recognising that public bodies may resist entering a partnership with civil society, and in some settings more angry CSO strategies (including protests) are warranted.
6. Evolve a “unique selling point” for PTF in supporting CSOs fighting corruption in the delivery of public services.

Recommendations to PTF on Programme Management

1. Keep it simple. Reduce to a minimum the demands of grant applications and other business processes (especially for grassroots partners). Be gentler in demands for detailed log-frames, impact matrices and budget projections (instead ask for and monitor detailed budget actuals); don’t overwhelm grantees with long and complex

sets of rules; and don't require more detailed reporting than will actually be used. Provide help to grassroots group in preparing the documents that are required and in outreach.

2. Improve funding decisions in particular to avoid a funding gap and loss of project momentum: (a) with multiple-phase projects, start processing the next phase before the previous one is completed; and (b) always notify grantees once a bank transfer has been authorized.
3. Review the current approach with respect to voluntary PTF advisors. Some tasks are currently not adequately met because of insufficient volunteer interest, and some tasks that the advisors are set might be better met by in-country partners. On the other hand the advice to partners is often very valuable and could be deepened by more exchange by phone or skype. Advisors could contribute more to grantee capacity-building (such as training in PTF business processes) and networking.
4. While introducing a revised common reporting framework is valuable, it must be user-friendly, and user-friendly help must be provided on its application.
5. While grantees should be held to high governance standards, requirements must be realistic. In particular, grants in India should not be held up simply because the backlog at the Credibility Alliance is holding up accreditation.
6. Aim to become a networking organization – finding creative ways to foster: links and exchange visits between grantees; mutual support mechanisms; experience exchange with other social accountability practitioners; and sharing experience in ways that encourage replication of what works. In particular, a “partners’ corner” of PTF’s website could be developed for this and PTF advisors could be talent scouts for the other practitioners.
7. Strengthen PTF’s communications generally including (a) making the website a choice destination for social accountability practitioners worldwide and keeping it updated; (b) using other ways to disseminate best practices illustrated by PTF partners; and (c) strengthening dialogue with other donors interested in governance so that strategies can be compared and mutually supported and so that PTF can better advise its partners on other potential funding sources they might apply to.

Recommendations to DFID

1. DFID’s bureaucratic requirements are intended to ensure its funds make a real difference but they can present a problem to small groups who lack the skills to express their work well in detailed log-frames and results matrices. Moreover this approach, relayed through GTF’s direct partners, may veer grantees to a fixed view of their project rather than encouraging the adaptive thinking that is particularly important in this field. DFID should ease its requirements if GTF wishes to support innovation at the grassroots level.

2. DFID should do more to disseminate the experience of effective programmes supported by GTF, not just provide funds. It should consider a bursary scheme to enable ultimate GTF beneficiaries to travel overseas for important workshops or for exchange visits with other CSOs. It should also be prepared to provide more funds to PTF and other partners to facilitate better knowledge management and networking.
3. DFID should either renew the GTF or find other ways to fund PTF and other partners who have proved effective, and it should ensure that assured funding is in place at least one year before the end of the current GTF period, to avoid losing the valuable momentum of effective work on the ground.
4. At the country level, DFID governance advisors or other staff should make efforts to engage with GTF grantees, both to share experience and to ensure they are in contact with each other. At present it is not easy to find out which groups are supported by GTF funding in a given country.

ANNEXES

Annex 1 a. Achievement Rating Scale (using PTF's original log-frame)

- 1 = fully achieved, very few or no shortcomings
- 2 = largely achieved, despite a few short-comings
- 3 = only partially achieved, benefits and shortcomings finely balanced
- 4 = very limited achievement, extensive shortcomings
- 5 = not achieved

Objective Statement	Achievement Rating for period being assessed	Log frame Indicators	Baseline for Indicators	Progress against the Indicators	MTR Comments
<p>Purpose</p> <ol style="list-style-type: none"> 1. Reduced bribery 2. Reduced misuse of public resources 3. Reduced distortions and increased accountability in public decision making 4. CSOs design projects with logical flow 5. CSOs develop working relationships with public agency "champion" 	<p>For purposes (1), (2) and (3) it is too early to tell whether CAC as a whole is on track to achieve all that was envisaged in these longer run purposes but the indications are positive. Hence we rate them 2</p> <p>We rate purpose (4) as 1</p> <p>We rate purpose (5) as 2</p>	<ol style="list-style-type: none"> 1) Estimate of reduced paying of bribes for all PTF funded projects by CSO's; 2) Estimates of aggregate public savings for all PTF funded projects by CSO's <ol style="list-style-type: none"> 3.a) Estimated increase in exposure of public agencies by CSO interventions, leading to more transparent and/or effective actions taken by these agencies that are attributed to PTF supported projects 3.b) Estimated reduction in public official discretion caused by CSO interventions, leading to more transparent and/or effective actions taken by public agencies that are attributed to PTF 	<p>The CAC inception report proposes a "before and after" comparison for each project. Since PTF started working on the GTF it has sought to assess the "before" situations, in addition to progress reports and independent site checks for several cases</p>	<p>Progress made by grantees has been impressive especially given the challenges they are facing. More data will be available by end-2011.</p>	<p>There are clear examples of CAC projects reducing bribery, corruption and distortions in public decision-making. It is too early to tell whether this is the norm or just e.g.s of the best. All grants reviewed by MTR seemed well designed and realistic. Strenuous efforts were being made to engage with public bodies and to seek out reform champions.</p>

		<p>supported projects</p> <p>4) The number of grantee project proposals that do NOT need a major overhaul (contain at least 4 of the 5 logical design features) increases from 20 to 80 % in 4 years</p> <p>5.a) 80% of all activities funded by PTF are conducted under a CSO/public agency partnership with “champions”</p> <p>5.b) Of these, 75% lead to significant measurable positive anti-corruption action</p>			<p>With PTFs rapid expansion there is an ever-expanding database of “lessons learnt” that will permit greater confidence in these ratings by the project close.</p>
<p>Outputs</p> <p>Improved performance in fighting corruption of PTF grantee CSOs in low and lower-middle income countries as manifested in:</p> <p>1) CSOs develop and/or adopt new anti-corruption tools, mechanisms and approaches and</p> <p>2) CSOs share their experiences with others in and outside their countries</p>	<p>We rate output (1) as 2</p> <p>We rate output (2) as 3</p>	<p>90 % of all grantees hold an event</p> <p>80% of all grantees use and/or develop innovative anti-corruption tools</p> <p>80% of all grantees share experiences in their countries. Of these, 50% post information on their website</p>	<p>Reported in</p> <p>1) Project documents;</p> <p>2) Progress reports,</p> <p>3) Project Completion Reports and Assessments</p> <p>4) Radio and TV programs press articles, blogs, and websites.</p>	<p>Progress against these indicators were largely met except in the dissemination of experience. Grantees may be doing their own dissemination but PTF could do more to help.</p>	<p>Excellent progress has been made in (1), albeit many expected obstacles have been encountered as expected in activities addressing abuse of power. Weaknesses were detected in the dissemination of experience. Few opportunities are given for exchanging experience (except in India) and PTF is lagging in its website and communications.</p>

Activities					
1) Direct grants	Activity (1) is rated 1	1) 70+ PTF-CSO grant agreements are in place over a 5-year period; 30 highly qualified PTF Advisers are available to provide high-quality and timely advice; 70+ CSOs present Project Completion Reports, including lessons learnt, and account of actual change; PTF Advisers facilitate implementation of Project Completion Assessment Reports		To date CAC has made 44 grants, including 4 repeater grants. It has a roster of 44 senior advisors. It appears that grantees are preparing their PCRs on time at the close of their projects.	PTF is fully on track to meet the CAC target of 70+ high quality grants and the pace is accelerating. The MTR has some reservations on the roles of volunteer advisors, but now external resources are being tapped, e.g. for PCAs.
2) Capacity building	Activity (2) is rated 3	2) 20 workshops held, X hits on PTF website, X PTF presentations at conferences; X written outputs; PTF Advisers work one-on-one with grantees; .		Regular events are held in India but not elsewhere.	PTF sees CSO capacity building by mentoring and workshops as a key strength and a main activity. While this is evident in India, it is less clear elsewhere. In particular much more could be done to facilitate exchange and networking.
3) Regional Partnerships	Activity (3) is rated 1	3) Signed partnership agreements and quarterly progress report		Long-term partnership with Public Affairs Centre (PAC) in Bangalore is in place and doing very well. The one in Philippines is being strengthened and new country partnerships are being developed in Kenya and Uganda.	The partnerships are proving very effective and there is scope to increase this further.

Annex 1 b. Achievement Rating Scale (using Revised Logical Framework prepared by PTF in May 2011)

In his letter to PTF dated 17 August 2010, the GTF fund manager in KPMG advised PTF to prepare a revised logical framework that correlated more clearly with the organization’s budget and work-plan. He further requested that this be included in the MTR. We have therefore provided this alternative achievement rating scale using PTF’s recently revised log-frame. The rating scales remain the same as for Annex 1 a.

	Measurable Indicators	Means of Verification	Important Assumptions	MTR Ratings and Comments
<p>Goal: Reduced corruption in the management of public funds/assets and in the delivery of public services to the greater benefit of the public.</p>	<p>More transparent and accountable public service delivery, systems of public finance management, public procurement, public assets management and more effective citizen monitoring of the above.</p>	<p>Aggregation of grades awarded based on assessments before and after grantee projects, checked by PTF Advisers as described under “intermediate outcomes” below .</p>	<p>Relevant data for assessment will be available in most cases.</p>	<p>PTF’s CAC programme is making good progress and it became evident during the MTR that PTF is gaining a strong reputation as an effective agency in reducing corruption.</p>
<p><u>Purpose (Intermediate Outcomes):</u> Some 50 CSO grantees in developing countries/transition economies directly and effectively engaged in fighting corruption, piloting new anti-corruption tools and approaches and lobbying for</p>	<p>1. Reduced corruption resulting from PTF-CAC assisted projects . 2. More transparent and accountable public agencies as a result of PTF grantees’ interventions. 3. Reforms in administrative practices resulting from</p>	<p>PTF requires all project proposals to make clear what results, outcome and impact are sought through the implementation of each project, how these will be assessed and to report in their PCRs to what extent these have been achieved. PTF staff/Advisers will</p>	<p>1. Design of effective impact assessment methods 2. Public agencies that are responsive to CSO advocacy 3. Responsible reporting</p>	<p>For the Purpose it is too early to tell whether CAC as a whole is on track to achieve all that was envisaged but the indications are positive. Hence we rate it 2 There are clear examples of CAC projects reducing</p>

<p>system reforms that make corruption less likely.</p>	<p>grantees' advocacy, leading to more transparent, honest and accountable public agencies.</p>	<p>grade each project from I (no impact) to 5 (very high impact) using where possible site visits and where available independent project completion assessments.</p>	<p>in media</p>	<p>bribery, corruption and distortions in public decision-making. It is too early to tell whether this is the norm or just e.g.s of the best.</p> <p>PTF and its grantees are making strenuous efforts to engage with public bodies and to seek out reform champions.</p>
<p><u>Outputs:</u></p> <p>1. Grantee CSOs implement 70+ anti-corruption projects.</p> <p>2. Grantee CSOs develop and/or adopt/adapt (what are for them) new anti-corruption tools, mechanisms and approaches .</p>	<p>1. 80+% of Grantee CSOs Projects successfully implemented and satisfactory project completion reports are PCRs submitted and project completion assessments produced for over 50% of projects</p> <p>2. 50+% of Grantee CSOs develop and/or adopt/adapt (what are for them) new anti-corruption tools, mechanisms and approaches and document these in their PCRs</p>	<p><u>For all outputs:</u></p> <p>1. <u>Internal:</u> a) Project documents, correspondence between CSOs and Project Advisers; b) CSO project progress reports; c) project completion reports; d) independent project completion assessments; and e) where feasible, site visits</p> <p>2. <u>External:</u> a) CSO</p>	<p>a) Presence of supportive officials (“champions”) in the public sector</p> <p>b) Where needed, public disclosure and freedom of information rules which allow sufficient basis for CSO monitoring</p> <p>c) Financial information is available and accessible</p>	<p>Output (1) is rated 1. Excellent progress has been made. We 43 grants have been made to date, and most of these are performing adequately or better, albeit many expected obstacles are encountered as expected in anti-corruption activities.</p> <p>Output (2) is rated 2. The grantees’ new tools are often innovative as well as effective in the MTR’s experience,</p>

<p>3. Grantee CSOs document, share among themselves and disseminate to a wider audience their experiences in fighting corruption and the lessons learnt through the implementation of PTF assisted projects.</p> <p>4. Grantees’ capacities to undertake anti-corruption activities are enhanced</p>	<p>3. Workshops are held bringing together grantee CSOs involving 70+% of grantees and workshop reports are prepared and posted on CSO and PTF websites.</p> <p>4. Quality of the CSOs’ outputs improve over the course of project preparation and implementation</p>	<p>website, b) media reports, c) PTF website, d) PTF “lessons learnt” sheets</p>	<p>d) CSOs are capable of collaborating strategically, rather than confront and expose public agencies</p>	<p>albeit many are commonplace tools and perhaps some (such as right to information requests) may be overused.</p> <p>Outputs (3) and (4) are rated 3. Weaknesses were detected in the dissemination of experience. Few opportunities are given for exchanging experience (except in India) and PTF is lagging in its website and communications.</p> <p>Likewise, PTF could do more to enhance grantee capacities if resources for this are made available.</p>
<p><u>Activities:</u></p> <p>1. Provision of technical and financial assistance to grantee CSOs through PTF funded projects</p>	<p>1a. 70+ PTF-CSO grant agreements put in place over a 5-year period</p> <p>1b. Some 30 highly qualified PTF Advisers are available to provide high-quality and</p>	<p>1a. Signed grant agreements</p> <p>1b. Records of TA provided by PTF</p>	<p>1. Enabling environment in countries supportive of CSO operations and sufficient number of good quality proposals submitted</p>	<p>Activity (1) is rated 1 PTF is fully on track to meet the CAC target of 70+ high quality grants and the pace is accelerating. The MTR</p>

<p>2. Partnership arrangements with 4 regional /country partners that will assist PTF in identifying and verifying applicants, soliciting and assessing proposals and monitoring implementation</p> <p>3) Sharing and dissemination of PTF experience relating to local CSO capacity building, and by maintaining an updated website</p>	<p>timely advice 1c. 60+ CSOs present Project Completion Reports, including lessons learnt, and account of actual change 1d. 35+ Project Completion Assessment Reports prepared</p> <p>2. Signed partnership agreements and quarterly progress report</p> <p>3.a) 20 workshops held, 3.b) no. of hits on PTF website, 3.c) PTF presentations at 5 conferences 3.d) Written outputs (Lessons Learnt summary sheets, Book on PTF's citizens against corruption programme)</p>	<p>1c. CSO Project Completion Reports and PTF site visits reports/assessments</p> <p>1d. Receipt of satisfactory PCAs</p> <p>2. Signed partnership agreements</p> <p>3) Workshop reports, conference reports, and website postings.</p>	<p>from competent CSOs</p> <p>2. Use of regional and country partner model will strengthen local capacity for curbing corruption, and thereby enable PTF to reduce its reliance on foreign volunteer inputs needed.</p> <p>3) PTF is invited to make presentations at international conferences addressing questions of corruption, transparency and social accountability</p>	<p>has some reservations on the roles of volunteer advisors, but now external resources are being tapped, e.g. for PCAs.</p> <p>Activity (2) is rated 1 The partnerships are proving very effective and there is scope to increase this further.</p> <p>Activity (3) is rated 3 PTF sees CSO capacity building by mentoring and workshops as a key strength and a main activity. While this is evident in India, it is less clear elsewhere. In particular much more could be done to facilitate exchange and networking.</p>
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Annex 2.

Terms of Reference for the Mid-Term Review (15 August 2010)

1. Introduction

The purpose of the Mid-Term Review (MTR) is to provide an independent assessment on the progress and performance to date, to measure and report on achievements and early signs of change and impact, and to indicate adjustments that may need to be made to ensure the success of the CAC programme. The MTR will be used by PTF to inform its future work.

The MTR regarded as a key process in the programme management cycle, comparing actual progress against programme targets and an assessment of value for money. The MTR will include a review of the risk analysis of the CAC programme and provides an opportunity to ensure continuous learning and quality control. The MTR is seen as an opportunity to ensure funds are used effectively and efficiently to deliver outputs/outcomes.

Brief description of CAC Programme

PTF is an international CSO supporting direct action anti-corruption projects implemented by partner CSOs in poor countries. PTF's Citizens Against Corruption (CAC) is a £2 million DFID funded programme to carry forward PTF's support for civil society organisations fighting corruption by directly engaging with public agencies through a series of specific time-bound projects.

Convinced that the key to promoting more honest and accountable government lies in fostering a strong local demand for better governance coming from civil society, PTF has pioneered the "demand-side" approach to good governance by encouraging CSOs to seek greater openness in government and to track the delivery of public services. PTF seeks to promote CSOs piloting innovative ways to improve transparency, accountability and fight corruption. PTF makes small grants to support eligible CSO projects and uses highly experienced volunteer governance specialists to provide technical advice on project design and management.

The PTF helps gives voice to civil society and, through the projects it supports, demonstrates the value of constructive partnerships with government agencies, building capacity and developing mechanisms for holding governments accountable. It aims through these activities to reduce corruption in the countries where its partner CSOs are located.

2. Scope and Scale

The evaluation will cover the CAC programme described in PTF's funding application to GTF dated 18 September 2007 and the related log frame. CAC is a global programme that is being implemented in 15 countries around the world covering four continents and involving some 33 CSO grantees. PTF works with local partners where feasible; these provide local knowledge, assist in locating CSOs qualified to be receive PTF support and help monitor project implementation and disseminate knowledge.

PTF seeks to support projects that are expected to have clear outcomes and sustainable impacts in terms of reduced corruption and/or greater transparency and public accountability, identified as far as possible in a results framework.

It is hoped that the mid-term review will be able to give us a clear sense of the programme's achievements, and failures, as a whole and the reasons behind these. However, it will not be possible to cover every area of the programme in detail. The goal is to ensure that the CAC programme remains relevant, realistic and achievable within the remaining timeframe and budget and, if necessary, adjust the programme design and logframe in order to improve likelihood of impact and sustainability.

The specific purposes of the MTR is to:

- Provide an independent assessment of the progress and performance of the programme to date against targets
- Measure and report on achievements and early signs of change and impact
- Indicate programme adjustments and changes that need to be made to ensure its success
- Analyse the cost effectiveness of the different approaches taken
- Review the programme's measures to manage risk

3. Principal questions to be considered in the evaluation process

The evaluation questions will be refined in consultation with the person engaged to undertake the MTR. The MTR evaluation should assess:

- a) **Progress:** Implementation progress and performance against goals, achievements to date, and adjustments made or needed to ensure success
- b) **Impact:** The extent to which the activities supported by PTF have or are likely to contribute to an eventual reduction in corruption by both raising public awareness of corruption and leading to actions taken that actually reduce or discourage corruption or create conditions or processes and

procedures that discourage corruption. The Mid-Term Review should provide a judgment on the M & E arrangements established by the beneficiary CSOs and by PTF.

c) Relevance to DFID's governance reform priorities: The programme's significance with respect to DFID's concerns regarding increasing voice, accountability and responsiveness within the different contexts in which implementation happened.

- How successfully did the programme promote demand-side governance at local or national levels?
- How did the programme relate to DFID's country assistance plans? Were there any relations? Was the programme complementary?

d) Efficiency and value for money: To what extent have the CAC programme's approach, procedures and use of resources contributed to or hindered the achievement of results:

- Has value for money been achieved in the implementation of programme activities? Could the same results have been achieved for less money?
- Were fees and other expenditures appropriate to the context?
- Are there clear links between significant expenditures and key programme outputs?
- How well did the management and programme delivery arrangements work and how did they well did they develop over time?
- How well did the financial management systems work?
- How were local partners involved in programme management and how effective was this and what have been the benefits of or difficulties with this involvement?
- Were the risks properly identified and well managed?

e) Effectiveness: Assessment of how far the intended outputs and results were achieved in relation to targets set in the original logical framework.

- Have interventions achieved or are likely to achieve objectives?
- How effective and appropriate was the programme approach?
- With hindsight, how could it have been improved?

f) Sustainability: What is the potential for the continuation of the impact achieved and of the delivery mechanisms following the withdrawal of CAC support?

- What are the prospects for the benefits of the programme being sustained after the funding stops? Does this match the intentions?

- How has/could collaboration, networking and influencing of opinion support sustainability?

g) Replicability: How replicable is the approach and process that introduced the changes/impact?

Refer especially to innovative aspects, which are replicable.

- What aspects of the programme are replicable elsewhere?
- Under what circumstances and/or in what contexts would the programme be replicable?
- What are the implications/lessons for PTF and its partners' future efforts to fight corruption?

The MTR should also offer an assessment and insights regarding the following two questions related to PTF business model:

1. Is PTF doing things right?

- (a) The Approach. The PTF historically was a demand-driven organization that responded to requests from individual CSOs for support. Most projects were single operations in individual countries. The GTF-funded program is supporting three different approaches: (i) the original direct One-On-One partnership with grantees (primarily in Africa); (ii) a concentrated model in India, where most projects are focused on monitoring corruption in two national programs (for guaranteed employment and food distribution) in two states—Orissa and Karnataka. The India program is supported by a local partner agency, the Public Affairs Centre in Bangalore; and (iii) the more modest country program as in the Philippines and Uganda. .. What are the advantages and disadvantages of these different approaches? Is one likely to be more effective and sustainable? Does having a local partner add real value without diminishing the PTF's unique strengths—using senior project advisors to support CSOs in a non-bureaucratic way?
- (b) Grant size. PTF grants have mostly been around \$25,000 or less, with modest counterpart funding. Were these small grants generally been appropriate and cost effective given management, reporting and auditing requirements? Should PTF consider making substantially larger grants?
- (c) Methodology. The PTF has developed a set of operational guidelines for Advisers and CSO grant applicants. These have been further elaborated by PAC. Are they appropriate, adequate and well conceived?

2. Learning and adapting: monitoring, measuring and evaluating

PTF has made considerable efforts to put in place a monitoring and evaluation process for both individual projects and for the PTF program as a whole. Is the existing M&E system adequate and sufficient? How might it be improved? And are the learnings adequately disseminated?

4. Evaluation Methodology

It is envisaged that the evaluation will be based on:

- A review of PTF reports, a sample of grantee CSOs' project proposals and log frames, project completion reports and where available project completion assessments.
- Questionnaire to PTF partners, and analysis of the returns.
- Interviews with key stakeholders
- Interviews with selected grantees
- Visits to 5/6 countries (countries to be decided) and prepare probably 31 Project Completion Assessments
- Participation in the IACC Meeting in Bangkok in November 2010 where the PTF will sponsor a workshop on the results of the program in India and lessons learned
- Collation of evidence and stories useful for both evaluation and communication work

The evaluator will work collaboratively with PTF to refine the methodology and develop a detailed evaluation plan.

5. Evaluation Process and Timeline

The evaluation is expected to begin in October 2010 and be completed by the end of April 2011. The following table indicates the detailed timing.

Action	By When	Who
Final TORs agreed	31 July 2010	PTF
Evaluator's selection confirmed	31 July 2010	PTF/GTF
Refine methodology, develop overall evaluation plan and agree contractual details	31 August 2010	Consultant/PTF
Evaluation undertaken	Oct 10 – Feb 11	Consultant
Presentation and discussion of initial findings/first draft with wider PTF team and partners	early Mar. 2011	Consultant/PTF
Meeting to review draft report in detail	mid Mar. 2011	Consultant/PTF
Final evaluation submitted	End April 2011	Consultant
Write and issue PTF response	May 2011	PTF
Evaluation published online + disseminated	30 June 2011	PTF

6. Outputs

Outputs will include:

- An evaluation plan.
- Questionnaire
- A presentation of initial evaluation findings/first draft for discussions with the PTF.
- Full Mid Term Review, approx 40 pages, of publishable quality.
- Executive Summary, stand alone, 'communicable', 4 pages, and
- Up to five Project Completion Assessments.

7. Skills and Competencies

The consultant/evaluator must have an in-depth understanding of the role of civil society in fighting corruption and in promoting the demand for good governance in developing countries. He/she should have a strong record in conducting evaluations, including of advocacy work. The consultant will have respect and credibility within the field and a good knowledge of monitoring and evaluation methodologies and policy work and experience of working with and evaluating CSOs. She/he should be familiar with policy advocacy work and have demonstrated political sensitivity. He/she must have an ability to write concise, readable and analytical reports.

Annex 3. List of Interviews

- **PTF Chair:** Ana Cruz
- **PTF Principals** - in Washington and UK: Pierre Landell-Mills, Dan Ritchie, Roger Sullivan, Pietronella Van Den Oever, Kathleen White, Debbie Cooper, Frank Vogl
- **PTF Regional Advisors:** Gerry Van Der Linden, Vinay Bargava, Cathy Stevulak,
- **Makati Business Club** (Philippines country partner): Jose Cuisa (Chairman); Edward Gacusana (CAC coordinator for Philippines)
- **Public Affairs Centre** (South Asia Regional Partner), Bangalore: Suresh, Ravi, Srikanth;
- **Grantees:** Directors and/or senior managers plus project coordinators and other staff working on the CAC project for all Philippines grantees plus Cebu-based partners of EBJFI, all Indian grantees (except RLEK and Janeethi) and all grantees in Cameroon.
- **International Anti-Corruption Conference in Bangkok** the MTR was also able to meet leaders of three other grantees, from Mongolia (Transparency International), Uganda, and Latvia as well as representatives of CSOs who receive PTF funding from sources other than GTF.
- **Government officials** or elected representatives directly involved in CAC projects in India, Philippines and Cameroon (including the mayor of Buéa and the SW regional representatives for human rights, sports & youth and election monitoring).
- **Local representatives:** elected councillors, village chiefs and other leaders of communities where the Cameroon budget tracking project is active
- **Academics:** including the Vice Chancellor, Deputy Vice Chancellors and others academic and administrative staff at the University of Buéa; senior staff at the Pan-African Institute of Development (West Africa)
- **Media:** acting editor and journalists from Cameroon Radio and TV
- **DFID:** Dr. Peter Evans, Senior Governance Advisor, India; Roy Trivedy, Head of Civil Society, UK
- **Grassroots Research and Action Movement, Mysore:** Dr. R. Balasubramanyam
- **Participatory Research in Asia** (responsible for independent project evaluations in India): Rajesh Tandon, Kaustuv, Bhavati, Indrani, Manoj, Vikas
- **National Campaign for People's Right to Information, India:** Shekhar Singh
- **Social Watch India/Don't Break Your Promise Campaign:** Amitabh Behar
- **Cameroon NGOs** (other than PTF partners): founder-directors of TK Foundation, Elwyn Rock Foundation, Help Out Centre for Human Rights, Cameroon Youth Against Corruption, and SWECSO (the SW Civil Society Network).

Annex 4. *List of Documents Reviewed*

- CAC Inception Report, annexes and KPMG feedback
- CAC Grant Application to DFID-GTF, including log-frame and budget
- GTF Grant Agreement with PTF (and annexes)
- Annual PTF reports to DFID-GTF for 2009 and 2010, and KPMG responses
- PTF Annual Reports (2008, 2009, 2010)
- Independent PTF evaluations (2005 and 2008)
- PTF Strategic Plan, 2010-14
- Partnering with the PTF: Guidelines for Civil Society Organizations
- Project documents, PCAs and reports of CAC workshops in Philippines
- MOU between PTF and Makati Business Club
- Project documents, PCAs and reports of CAC workshops in India
- Independent project assessments by PRIA in India, and synthesis report
- Draft Operations Manual for Indian PTF applicants
- PTF advisor reports on Indian programme
- Project documents, PCAs and reports of CAC workshops in Cameroon
- Proposals for PTF project funding in Kenya and Indonesia
- All responses to the emailed and on-line survey of CAC grantees
- Various other documents available on PTF's website

Annex 5. Schedule of Mid-Term Review Process

The MTR process was designed to capture the experience and suggestions of the majority of grantees and key stakeholders of the CAC programme while at the same time being as cost-effective as possible (piggy-backing on trips for other purposes to Kenya, USA and Asia). The elements were:

- **25-29 October, 2010:** UK: Prepared work-plan; reviewed basic PTF documents; prepared for trip to Philippines and Thailand; drafted questionnaire for grantees
- **31 Oct. – 9 November:** Philippines: (1) met grantees and other PTF stakeholders in Manila and Cebu to assess progress regarding the CAC-Philippines programme; (2) assessed progress w.r.t. PTF's partnership with Makati Business Club; (3) took part in the PTF Forum with grantees on Nov. 5
- **10 – 14 November:** Bangkok: attended the 4th IACC Conference to – (1) participate in PTF's Workshop at the conference; (2) meet with key anti-corruption stakeholders, (esp. in civil society) for informal soundings about PTF-CAC and its future directions; (3) interview CAC grantees participating.
- **15 to 24 Nov:** UK: Review of PTF documents; preparation for trips.
- **7 to 8 December:** Washington DC, USA: : met in DC with PTF principals.
- **17 Dec to end Dec:** UK: Document review; preparation for trips to India and Cameroon; telephone interviews with PTF stakeholders, finalize and distribute questionnaires to grantees (in "Word" and "Survey-Monkey" on-line format).
- **8 Jan. to 4 March:** India, including visits to Karnataka, Orissa, Delhi, Rajasthan and Madhya Pradesh (this trip included pro-bono work for other NGOs and personal time). The main activities were to: (1) meet PTF grantees (for interviews and also field visits to see work on the ground); (2) assess progress w.r.t. PTF's partnership with Public Affairs Centre; (3) meet PRIA – the independent evaluator of CAC grantees; (4) take part in PTF Forums with grantees in Bangalore and Bhubaneshwar; (5) meet other CAC stakeholders including government officials and elected office-holders relevant to CAC grants, PTF's volunteer advisors in India, DFID-India governance advisor, national NGOs who provide leadership on governance in India, and one NGO that receives GTF funding for similar work but through a different INGO.
- **4 to 18 March:** UK: Survey analysis; preparation of rough draft of report.
- **19 to 27 March:** Cameroon: (1) 5 days for meeting grantees and other PTF stakeholders in Douala, Limbe, Buea and Tiko, to assess progress regarding the Cameroon programme; (2) 2 days to finalize draft report with input from Cameroon field visit and dissemination of draft report to PTF principals.
- **April to May:** review comments on draft report from PTF principals and prepare/disseminate revised report. Incorporate final revisions prior to submission of report to DFID.

Annex 6. Countries of CAC activity and Implementing Partners

CAC supports 43 CSOs in 16 countries across the world, with half these projects in just two countries (India and Philippines), and – on the other end of the concentration spectrum – ten countries with just one project. The distribution of the 43 grants is as follows:

AFRICA

Cameroon: *Global Network for Good Governance:* Play Football, Stop Corruption

Cameroon: *Association for Youth and Sustainable Development:* Budget Transparency Project with Buea Council

Cameroon: *International Governance Institute:* Strengthening its internal mechanisms for tracking and curbing corruption in the University of Buea

Cameroon: *ALDED:* Monitoring the quality of classroom construction in the Departments of Mefou and Afamba

Ghana: *SAVE Ghana:* Election Monitoring

Ghana: *PAGE:* Tracking internally generated local government funds in the Sissala

Ghana: *PAWLA:* Enhancing transparency and reducing corruption in the collection and distribution of internally generated funds in the Sissala East District Assembly

Liberia: *Liberia Democratic Institute:* Improving Transparency in District Development Programs

Nigeria: *DARC* Reducing Procurement Risk in DPPID Cross River State

Rwanda: *Transparency Rwanda:* Increasing Transparency in Land Registration in Kigali and Supplemental Project for creation of a web site

Sierra Leone: *Society for Democratic Initiatives:* Promoting the Enactment of a Freedom of Information Law

Uganda: *National Foundation for Democracy and Human Rights in Uganda:* Community Police Anti-Corruption Project

Uganda: *UENO:* Enhancing Community Involvement in Monitoring School Building

Uganda: *Uganda Law Society:* Enhancing the Capacity of Lawyers to Promote Accountability-- Monitoring Court Corruption Cases

(Congo: *LICOCO* – grant cancelled)

CENTRAL & EAST EUROPE/FORMER SOVIET UNION (CEE/FSU)

Latvia: *DELNA:* Monitoring of the Construction Phase of the National Library (Phase II: Strengthening technical expertise)

Moldova: *Soarta Community Association:* Monitoring the Examination System in Rayon Soroca.

EAST ASIA

Indonesia: *Centre for Regional Information & Studies:* Building a Citizen Monitoring System on Budget Expenditure Accountability in the Education Sector

Mongolia: *Globe International:* Empowering the Public Council for Promoting Transparency to Curb Government Corruption in Mongolia

Mongolia, *Transparency Mongolia:* Improvement of Judicial Code of Ethics.

Philippines: *Ecolink:* SK Watch: Monitoring Funds of Youth Councils

Philippines: *Evelio B. Javier Foundation, Inc.:* Strengthening Local Mechanisms for Effective Civil Society Organizations' Participation in Procurement Processes

Philippines: *Concerned Citizens of Abra for Good Government:* Abra Water and Irrigation System Watch

Philippines: *G-Watch:* Localization of the Protect Procurement Project to make the transparency and accountability mechanisms for procurement more effective and tighter at the local level

Philippines: *PhilDHARRA:* Bantay Agri Tayo (Let's Watch Agriculture): Harnessing Multi-Stakeholder Efforts to Promote Transparency and Accountability in the Department of Agriculture-Region 7

Philippines: *Namfrel:* Monitoring the procurement, delivery and inventorying of priority drugs and medicines in 71 DOH retained hospitals and 16 Centers for Health Development nationwide

LATIN AMERICA

Trinidad and Tobago: *Transparency International National Chapter.* Support for advocacy relating to the Government's Construction Sector Enquiry

SOUTH ASIA

[Note: The following 17 projects are all implemented under the Citizens Against Corruption (CAC) program with the *Public Affairs Centre* in Bangalore.]

India: *Adhar:* Reducing corruption in the NREGA and PDS, Loisingha Block, Balangir District, Orissa

India: *Ayaskam:* Reducing corruption in the health sector (NRHM programme), Kariar Block, Nuapada District, Orissa

India: *Centre for Advocacy and Research:* Reducing corruption in the delivery of schemes for vulnerable peoples in urban slums, Bangalore, Karnataka

India: *Consumer Unity & Trust Society:* Using the RTI Act to check corruption in Rural Development Programmes in Rajasthan)

India: *Jananeethi:* Reducing corruption in drug trial conduction, Kerala

India: *Paraspara Trust:* Reducing corruption in the Public Distribution System in urban slums, Bangalore

India: *People's Rural Education Movement:* Reduce corruption in implementing NREGS, PDS and Forest Rights Act through community based action in Orissa

India: *Nava Jeevana Mahila Okkoota:* Fighting corruption in the delivery of rights in PDS, NREGA and other services

India: *Rural Litigation and Enlightenment Kendra;* NREGA and Transparency Project in Uttarakhand

India: *Sambandh:* Reduce corruption in NREGS thru Social Watch Groups and Rural Call Centre approach

India: *Suraksha:* Reduce corruption in NREGS through community's use of RTI, Gumma Block, Gajapati District, Orissa

India: *Swami Vivkananda Youth Movement:* Mobilising youth and communities to fight corruption, Karnataka

India: *VICALP:* Reduce corruption in implementation of NREGS through community based action, Orissa

India: *Youth for Social Development:* Enabling Citizen Monitoring of Public Services, Preventing Bribery to Foster Effective Service Delivery in Brahmapur city of Orissa, Orissa

Nepal: *Forest Action:* Promoting Transparency & Accountability for Rights Based Community Forestry in Nepal

Nepal: *Samuhik Abhiyan:* Combating Corruption through Citizen Participation (Adviser: Jadadish Upadhyay)

Sri Lanka: *Transparency International National Chapter:* Reducing corruption in local government through use of Citizens Report Card and community action.