

Review of Project Completion Report

Name of CSO: *Women for Social Progress*

Project Reviewer: **Dante B. Delos Angeles**

Date: **December 11-12, 2012**

Key Project Data (From Project Completion Report)

<i>Title of Project</i>	Resolution of Conflict of Interest in Mongolia		
<i>Project Code</i>		<i>Project Location</i>	Ulaanbaatar, Mongolia
<i>Corruption Problem being addressed</i>	Corruption arising from the absence of legislation controlling conflict of interest situation. USAID framed the problem in this manner: Mongolia lacks the legal provisions, as well as the associated policy and regulatory framework that would define and prevent conflict of interest and sanction violations.		
<i>Project Objectives</i>	<ol style="list-style-type: none"> 1. Enhance government transparency and accountability, and the prevention of corruption 2. Enhance citizen and media awareness of COI and public service ethics 3. Enhance NGOs' capacity to contribute to and positively influence the regulation of COI processes by ensuring their active involvement and networked communication 4. Enhance NGOs' capacity and ownership in the implementation of such governance oversight and reform projects 5. Production of a locally relevant, internationally standardized and effective law on COI as well as an accompanying public service ethics handbook 		
	<i>Planned</i>	<i>Actual</i>	
<i>Implementation period</i>	January – October 2011	January 2011 – December 2012	
<i>Total Budget</i>	\$45, 580	\$45,580	
<i>PTF Contribution</i>	\$24,580	\$24,580	
<i>Top Three Results (actual)</i>	<ol style="list-style-type: none"> 1. Passage/adoption of the comprehensive, locally relevant, internationally standardized Conflict of Interest (COI) law 2. Production of COI Ethics Guidebook for government officials and the COI training of government officials, MPs, parliamentary staff, NGOs and media based on this Guidebook. The Training Program is replicable. 3. COI public awareness campaign 		

Completion Assessment¹

1. *The Implementation Performance*

- a. Extent to which the planned project activities and outputs were completed.²

1

¹ Ratings Scale: 1 = Highly Satisfactory/Likely; 2 = Satisfactory/Likely; 3 = Moderately Satisfactory/Likely; 4 = Moderately unsatisfactory/Unlikely; 5 = Unsatisfactory/Unlikely; 6 = Highly Unsatisfactory/Unlikely; N = Not Applicable

² Please compare the activities listed in the proposal and see if they were fully completed or partially.

b. Adequacy of financial reporting. ³	2
c. Adequacy of documentation posted on the website ⁴	2
d. Constructive engagement during implementation	1
e. Community empowerment activities.	1
f. Focus on sustainability	1

Comments and suggestions for improvement

1.a All planned activities were implemented and the expected results were achieved, albeit with some delays. WSP could be cited for the following good practices that contributed to the attainment of the goal, or the enactment of the COI law: (a) direct engagement of government agencies essential to attaining the initiative’s objective; (b) elaborate a well-studied proposal with expert help and wide participation of stakeholders; (c) seek to join the official working group charged with formulating legislation or policy; (d) use targeted training and public education to gain adherents; (e) engage in intensive lobbying with decision makers; and (d) launch a large-scale public awareness campaign. This reflects PTF model for effective constructive engagement.

1.b WSP submitted its final project financial report duly signed and certified by P. Enkhtuya (Financial Officer) and G. Munkhtsetseg of WSP. Reports also included copies of receipts supporting expenditures. The financial report however did not show the total and itemized expenditures from WSP contribution. Likewise WSP would be asked to submit its latest audited 2011 financial statements in forms required in Section 5.e of the Grant Agreement.

1.c WSP has been advised to post in its website www.wsp.mn the Grant Agreement, the project proposal, the project completion report and the project statement of expenditures in line with Section 5.i of the Grant Agreement. In addition it is recommended that the following documents be posted as well: (a) The COI Toolkit produced in the first project *Regulation of Conflict of Interest in Mongolia*, (b) Research Report documenting International Standards and ‘Best Practices’ relating to COI, (c) COI Ethics Guidebook, and (d) COI law itself.

1.d The project provided invaluable legal research and other technical support to the Office of the President’s Working Committee crafting the COI legislation, to Member of Parliament Kh. Temuujin sponsoring the COI bill in the Parliament, and the Independent Authority Against Corruption particularly during preparation and delivery of the COI training and manual. The media was also engaged by the project. An interview with the project leader was aired on C1 TV concerning the law and conflict of interest concepts, and a 40-minute round table discussion on COI among decision-makers, researchers and IAAC staff was also shown on National TV. Print media was also engaged to during advocacy phase and to explain COI in simple language accessible for the general public.

³ The Grant agreements require that the accounts of project related expenditures be audited and certified as true and accurate by the Auditor of the CSO.

1.e WSP had deepened its experience engaging the community on governance and anti-corruption actions through the public awareness campaign and the series of training and consultation with the NGO community. For instance the message and content of the posters and other public awareness campaigns were not just to inform the public, but to empower the citizenry. They explained the role of citizens in controlling COI abuses and in the enforcement of the COI Law. Likewise, involvement of NGOs throughout the project period has increased their capacity to engage with COI in an ongoing manner.

1.f The COI law is now a fact, and what remains is effective enforcement. The consultative Approach adopted by the project built in-depth understanding and capacities in IAAC (which would enforce the COI law) and the CSO community that could sustain the impacts of the project. Training on COI has become a regular funded program of IAAC. Project involvement of media institutions during consultation and public information campaigns would have also strengthened them to function as one of the pillars of the national integrity system. At the political level, WSP stated that major political parties are supporting COI regulation and the COI law. There is no doubt that COI will continue to be a hot political issue in elections to come, and this ensures that COI will remain on stakeholders' radar.

2. The Results

a. Accomplishments of the results specified in the logframe and/or project proposal	1
b. Clarity of Quantified and demonstrable results	1
c. Community empowerment outcomes	2
d. Robustness of the evidence for the results narrated in the completion reports.	1
e. Responsiveness of authorities to constructive engagement.	1
f. Value added of peer learning activities and events.	2
g. Project contribution to CSO partner capacity to carry out anti-corruption work.	1
Prospects for benefits of the project being sustained	2

Comments and suggestions for improvement

2.a Performance targets were achieved overall. The most important was the enactment of the COI Law in 19 January 2012, becoming effective 5 May 2012. All other results would contribute to making this singular success story more sustainable, such as: (a) involvement in consultation and public awareness campaigns particularly of IAAC, CSO community, and the media had fostered ownership of this result by these important stakeholders, (b) training conducted had increased skills and knowledge on COI of institutions and groups with critical roles during enforcements, and (c) The COI Ethics Guidebook for government officials has now set what is legal and what is not which was blur before COI.

This success story would not be complete without noting that it took a court action by a WSP team member to compel the Great Khural to act expeditiously on the long pending COI bill citing as basis the parliament obligation under the United Nations Convention Against Corruption. This court action demonstrated to the general public how an engaged citizen can influence government.

2.b/2.d The Logframe Result Framework showed mostly performance indicators which were clear and specific. Documents evidencing performance vis-à-vis indicators were submitted as part of the PCR. Result documents were shown both in Mongolian (full report) and English (only summaries). They would be posted and can be accessed in box.net.

2.c Public participation in the enforcement of the new COI law was promoted. The project ran print and television public awareness campaign on the COI that explained the role of citizens in controlling COI abuses and in the enforcement of the COI Law; ‘denormalized’ COI in order to shift public perception of COI from something that is common and must be accepted to something that is illegal; explained that COI enforcement has two sides: not just public officials and elected representatives must ensure its enforcement, but also the public; and informed citizens that they should take measures when they observe instances COI. In addition, the training program and manual encourage public officials, media and civil society to be part of COI enforcement.

2.e The project was built around substantive engagement with the Office of the President’s Working Committee drafting the COI, with the Member of Parliament sponsoring COI in the Parliament, and the IAAC which is charged with the enforcement of COI. Indeed results of WSP’s earlier project *Regulation of Conflict of Interest in Mongolia* became the starting point for the legislative work of MP Kh. Temuujin in authoring the first draft of the COI law. Both the Office of the President and the IAAC participated in the development of the training program and the trainers who would replicate nationwide the training conducted by the project.

2.f Project activity providing peer learning opportunities was limited to NGOs involved in the consultation, lobbying and public information campaign phases. WSP reported that peer learning was most demonstrated during the consultation phase in which NGOs and other stakeholders were able to share relevant experiences and ideas relating to the realities of COI and its legislative regulation. On another level, peer learning with IAAC was also most intense during the COI training program and manual development process. As a result these outputs have been ‘owned’ by IAAC, and post-project COI training for instance has become a regular funded activity by IAAC using the training curriculum developed with WSP. This training curriculum, among others, also promotes the COI Ethics Guidebook.

2.g Among Mongolian NGOs WSP has been the leading advocate in the specialized field of enacting conflict of interest legislation. PTF involvement in COI started in 2006 when it funded WSP’s project *Regulation of Conflict of Interest in Mongolia*. One should recall that in that project, WSP brought a legal challenge before Mongolia’s Constitutional Court to the practice of the Speaker of the Great Khural to unconstitutionally edit legislative bills after their approval by the parliament, altering the intent and principles of the laws and rendering them virtually ineffective and toothless. WSP won the legal battle, and as a result: (a) the Speaker of the Great Khural resigned and (b) strong public advocacy for a COI law was born - the media’s full coverage of the court battle brought COI issues to the forefront of public attention.

This follow-up project provided WSP the opportunity to deepen its experience engaging the community on governance and anti-corruption concerns at grass-roots level. As noted in the PCR, the project gave WSP valuable experience in developing value transformation contents in public awareness campaigns on corruption that call for public's role in anti-corruption efforts. Such campaigns faced challenges hard to overcome: a) the public officials and the citizenry alike had heretofore accepted COI as "normal" and not illegal in the absence of law and regulations imposing appropriate standards; and (b) the dispersion of its sparse population, the nomadic lifestyle of a large subsection of that population, and the country's harsh climate necessitated finding media resources with the greatest penetration into the countryside.

2.h Issues critical to project sustainability – institutional, technical, social, and financial – have been addressed:

Institutional – the COI law is now in the statute book of Mongolia. The IAAC is tasked to implement and enforce that law. Its enforcement should also be seen in conjunction with other anti-corruption measures that have already taken place – and has taken roots - in that country, some of which PTF had helped institute, such as the adoption of the Code of Ethics for Judges and other court personnel and the strengthening of the Public Council – composed of representatives of the civil society, the media included - which is now serving to oversee IAAC itself. Based on post-training evaluation feedback sent with the PCR, this training was highly effective.

Technical – the training for IAAC, Office of the President, the Parliament and the other government agencies, and participated in by media and CSO community, has provided skills and knowledge to important stakeholder groups with roles to play in sustaining project impact. Four IAAC trainers facilitated the training workshop, with assistance from WSP project staff. The printed COI Ethics Guidebook for state officials should aid in that regard. The Guidebook, titled Conflict of Interest, which discusses the COI law and conflict of interest as a general concept, details 11 ethics rules for use across all sectors. In summary, it covers (a) what are ethics for state officials, (b) COI and ethics requirements, (c) understanding COI, (d) managing COI, (e) guiding principles for COI, and (f) COI procedures, particularly how to report interests, who should report, and what to include in a report.

Social – The project made good use of constructive engagement and consultation with government agencies and the CSO community. It engaged in intensive public awareness campaign that suited the nomadic culture of a large segment of Mongolian sparse population. This awareness campaign was not merely to inform the public about COI and the law, but also to advocate for the citizenry to act and help enforce the COI law. It is hoped that NGOs and the citizenry would engage with COI in an ongoing manner.

Financial – IAAC is tasked to enforce the COI law, including holding of training and awareness campaign and monitoring compliance with the COI Ethics Guidebook. It is expected that IAAC would have the financial resources to act appropriately on this responsibility.

3. Summary of Assessment

Commentary on Overall Assessment

Project performance is Highly Satisfactory, with implementation very closely following the plan indicated in the proposal except for the delay of about a year. This delay had not affected the currency and importance of the end-goal: the enactment of a locally relevant COI law that also conforms with international standards and global best practices. To reiterate: the core of the implementation strategy was substantive engagement with the Office of the President's Working Committee drafting the COI, with the Member of Parliament sponsoring COI in the Parliament, and the IAAC which is charged with the enforcement of COI. The involvement of CSO community and the media in the consultation and public awareness phases were success factors, and were meant to promote sustainability of project impacts. It started with the project design which was straightforward, with objectives and activities all focused to the enactment and sustained enforcement of the COI law. The Approach was all encompassing, reflecting PTF's conception of how PTF-supported projects should proceed effectively specially in influencing policy making, as discussed in para 1.a above.

4. Dissemination

The following project outputs would be appropriate for wider dissemination through CSO Partner and/or PTF websites: (a) The COI Toolkit, although this was produced and printed by the first project *Resolution of Conflict of Interest*, (b) Research Report documenting International Standards and 'Best Practices' relating to COI, (c) COI Ethics Guidebook, and (d) COI law itself. All these could serve to inspire and provide model for other new democratizing countries without robust COI legislation. In para 1.c we suggested to WSP to also post these documents be posted in its website.

5. Next Steps

The release of the third tranche amounting to \$2,580 is now in order. All conditions in the Grant Agreement for the release of the third tranche have been complied with, namely the submission of (a) satisfactory Project Completion Report, and (b) final statement of project expenditures with accompanying certification. Additionally, initial assessment of project implementation based on the PCR showed a Highly Satisfactory performance.

It is noted that this assessment is based on the PCR and the two progress reports submitted by WSP. It is now appropriate to conduct the independent Project Completion Assessment on the ground. It is recommended that we deploy, if available, Mongolia-based Ms. Tirza Theunissen who made an outstanding PCA of Globe International project *Transparency Campaigning at Local Government to Curb Corruption*. She can be contacted via tirza.theunissen@yahoo.com

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⁴ The degree to which the project achieved, or seems likely to achieve, all or most of its objectives. Please base this rating on the detailed assessment above.