



EVALUATION REPORT

Project: Engaging Civil Society in Monitoring Conflict of Interest Policies

**Implemented by Transparency International Moldova
with the support of European Commission**

Contract number: ENPI 2013/ 313-750

Partners: Eurasia Partnership Foundation - Armenia, Transparency International Anti-corruption center - Armenia, Stefan Batory Foundation - Poland, Transparency International - Ukraine, Institute for Public Policy - Ukraine

**Independent Evaluator: Stela Cudalb
Chisinau, Moldova 2015**

ACKNOWLEDGEMENT
DISCLAIMER
LIST OF ACRONYMS

EXECUTIVE SUMMARY

I INTRODUCTION
II SCOPE OF EVALUATION AND METHODOLOGY
III EVALUATION FINDINGS
 (i) Relevance
 (ii) Effectiveness
 (iii) Efficiency
 (v) Sustainability
IV CONCLUSIONS

ANNEX: EVALUATION QUESTIONS

ACKNOWLEDGEMENT

The evaluator expresses its gratitude to Transparency International Moldova for the opportunity to carry out the Final Evaluation of the project “Engaging Civil Society in Monitoring Conflict of Interest Policies”. Special thanks to Lilia Carasciuc and Ianina Spinei who provided timely assistance and logistics to conduct project evaluation.

Disclaimer

This project evaluation report presents the view of the evaluator and does not necessarily fully correspond to the opinions of TI-Moldova staff or other stakeholders referred in the report.

Acronyms

Col	Conflict of Interest
CSO/s	Civil Society Organization/s
EaP	Eastern Partnership
EC	European Commission
EQ	Evaluation Question
EU	European Union
NGO/s	Non-Governmental Organization/s
RM	Republic of Moldova
TI-M	Transparency International Moldova
UIPP	Ukrainian Institute for Public Policy

EXECUTIVE SUMMARY

This report presents the findings, conclusions and recommendations of the final evaluation of the project: “*Engaging Civil Society in Monitoring Conflict of Interests*”. The project has been implemented by TI-Moldova in close partnership with the Eurasia Partnership Foundation (Armenia), Transparency International Anti-corruption center (Armenia), Stefan Batory Foundation (Poland), TORO Creative Union (Ukraine), Ukrainian Institute for Public Policy (Ukraine).

This is a two year project with a budget €440.000.00 with €396.000.00 contributed by the EC and the remaining part was ensured by each Partner as co-funding from other sources. The project implementation started in July 2013. The final evaluation was undertaken during the period July 2015.

The objectives of the final evaluation were to assess the performance of the project against key parameters, including the project's relevance, effectiveness, efficiency, sustainability and its strengths and weaknesses and to provide recommendations for similar future initiatives. The final project evaluation findings will be used for further possible improvements of the similar initiatives related to anti-corruption policy monitoring and in order to better react to the changing national and regional context, as well as generally for improvement of similar projects` design.

The methodology adopted by the evaluation team comprised a 'participatory' approach involving all types of stakeholders, integrating elements of outcome based evaluation, and identifying progress and results achieved at the end of the project. This included a review of all project documentation, finalization of semi-structured interviews for different stakeholders, to gain firsthand data and information through interviews and observations.

The overall objective of the project was to improve the quality of Col policies in Armenia, Moldova, Poland, Ukraine.

Specific Objectives of the project were to: (i) increase the capacity and enhance the monitoring practices of Col policies at central and local level in 4 countries of EU and EaP region; (ii) promote changes in the legislation and practices related to Col policies in cooperation with public authorities; (iii) increase public awareness on Col situations at local and national levels.

The evaluation proves that the project was an ambitious, relevant, mostly structured and a flexible initiative, which represented a multi-stakeholder and bottom-up approach. It has been specifically designed to address the challenges mentioned in the project context, i.e. to involve civil society actors and media representatives in monitoring Col policies/practices in the 4 countries as Armenia, Moldova, Poland and Ukraine.

If analysing the intervention logic and the links over the outcomes, outputs, activities and inputs shows that the project design reflects interventions that target preponderantly the “*right holders*” (NGOs, media representatives, central and local public authorities). The project design reflects the targets and log frame indicators

and takes into consideration the potential of the resources involved in the project implementation.

Overall, the project delivered the planned results and reached the objectives. The project managed to boost the capacity of civil society organizations from all 4 countries involved in the action to meaningfully participate in improving quality of Col policies, bringing expertise and strengthening the role of CSOs in monitoring government's policies of Col.

The evaluator concluded that the project managed to score well under the 3 specific objectives. Specific Objectives 1 *increase the capacity and enhance the monitoring practices of Col policies at central and local level in 4 countries of EU and EaP region*; Specific Objective 2 *promote changes in the legislation and practices related to Col policies in cooperation with public authorities*; Specific Objective 3 *increase public awareness on Col situations at local and national levels*.

The corner stones of the project were: provide training for the partner NGOs in order to increase their capacities to monitor and come up with interventions on Col policies and legal framework applicability; come up with expertise of the national legal framework; monitoring of implementation of Col policies at national and local level; train local CSOs through increasing their capacities to monitor Col legal framework at local level; the action included advocacy, communication and visibility and the experience collected to be summarised and made publicly.

All these specific objectives and actions contributed to establishment of the cooperation dialog between CS and central government ensuring as such a development of approaching the Col from civil society perspective which can be replicated by various organizations when planning their intervention strategy for the EaP and EU countries.

Based on the findings and conclusions of the final project evaluation the recommendations set forth in the report are to:

1. Capitalize the project experience and share it with EaP and EU countries
2. Use country reports, policy proposals, amendments to existing laws and survey and other studies carried out in the project for development of other development initiatives
3. Improve communication and create synergy with similar initiatives
4. Maintain the four country partnership approach and TI-M as key applicant. Plan more exchange practices in the countries involved in the similar actions
5. Encourage media representatives to be involved in the initiatives

I INTRODUCTION

Background and the project context

Extremely spread corruption and lack of good governance represent stringent issues of majority of EaP countries. Corruption is a well known phenomenon that distorts competition mechanism of the market economy and damages the integration of EaP countries into EU. As one of the threatening “flagella” towards democratic development represents poor Conflict of Interest policies in public services. This issue, as well as the need to consolidate the capacity of civil society to monitor Col policies in their countries and conduct a dialogue with their governments, was discussed at the EaP Civil Society Forum in Poznan in November 2011. The participants concluded that even if their countries are at different stages of creating an efficient Col legal framework, none of them have achieved significant efficiency in their practical application.

A number of six partner NGOs from Armenia, Moldova, Poland and Ukraine (TI-Moldova, Stefan Batory Foundation, TI-Armenia, Eurasia Partnership Foundation - Armenia, TI-Ukraine and the Ukrainian Institute for Public Policies) called their governments to align to European values and standards related to Col policies in this regarded action. The standards of these policies are being expressed in two main documents - the Council of Europe’s Recommendation on Codes of Conduct for Public Officials adopted on 11 May 2000 and the OECD Guidelines for Managing Conflict of Interest in the Public Service endorsed in the form of a Council Recommendation in June 2003.

In July 2013, Transparency International-Moldova launched the project “*Engaging Civil Society in Monitoring Conflict of Interests*” financially supported by the European Commission through the Development and Cooperation Instrument and European Neighbourhood and Partnership Instrument.

Project Overview

The overall objective of the project is to consolidate the capacity of CSOs in monitoring Conflict of interests (Col) policies and synergising efforts to conduct a constructive dialogue with their governments to improve the quality of governance. *The Overall (long term) objective of the Action* is to improve the quality of Col policies in Armenia, Moldova, Poland and Ukraine.

Specific objectives are to: increase the capacity of civil society to monitor Col policies in central and local public institutions in four countries; promote changes in the legislation and practices related to Col policies in cooperation with public authorities; increase the public awareness on the threat of Col for the spread of corruption at local and national levels.

Expected Results are that: a) the built capacity of 26 CSOs (6 working at the national level and 20 at the local level) in four countries (Poland, Moldova, Ukraine, and Armenia) in order to monitor conflict of interest policies strengthened; b) at least 12 central public authorities and 8 local authorities in the four countries will benefit from the post expertise recommendations to improve the legal framework that

regulates conflict of interest policies and their implementation; c) civil society and mass-media have a greater understanding of conflict of interest policies governing the conduct of public authorities, and of the various modalities to uncover conflicts of interest.

The total budget of the project is EUR 440,000.00, with EU contribution of 396,000.00 and the remaining part was ensured by each Partner as co-funding from other sources.

II SCOPE OF EVALUATION AND METHODOLOGY

A. Scope and objectives of the final evaluation

The objectives of the evaluation are to assess the performance of the project against key parameters, including the project's relevance, effectiveness, efficiency, sustainability, and its strengths and weaknesses and to provide TI-M with a technical and professional assessment of results, achievements, key challenges and lessons learnt from the implementation of the project.

B. Expected Use of the final evaluation

The findings of the project evaluation shall be used for further possible improvements of the similar initiatives related to the Moldovan civil society development and other EaP/EU countries.

C. Evaluation Approach and Methodology

The evaluation approach was results oriented to provide evidence of both quantitative and qualitative achievements. Different data and information were used in the evaluation while collected from a diverse range of sources. A part of information was collected from the documents provided to the evaluator and other data was collected from the stakeholders of the project through on site direct observations, interviews, and focus group discussions with the stakeholders.

The outlined methodology, which included desk review, focus groups, „face to face“ interviews, skype discussions and questionnaires sending, was capable of capturing information necessary to present an informed, professional and independent judgment on the TI-M project. The evaluator emphasised lessons learned, in the context of relevance, effectiveness, efficiency and sustainability, where it can be expected that project staff may be in a position to reinforce certain strategies during the follow up projects.

D. Limitations in data collection methodology

There are limitations related to obtaining accurate, objective and in-depth data such as difficulty in verifying the reliability and validity of data in documents and various monitoring and training reports or quantitative data produced by stakeholders.

The evaluator attempted to mitigate limitation issues by triangulation of information from stakeholders including the TI-M project team.

E. Management of Evaluation

The TI-M executive director fulfilled her responsibility to manage the final project evaluation. An Evaluation Reference Group was set up to ensure an efficient, participatory, accountable evaluation process, and to provide timely and comprehensive assistance and feedback on key project evaluation deliverables. The management of the evaluation ensured that key selected stakeholders were consulted. As mentioned, the evaluation was conducted following the DAC norms, standards and evaluation guidelines.

III EVALUATION FINDINGS

The findings of the evaluation are organized to highlight project Relevance, Effectiveness, Efficiency and Sustainability including questions pertaining to each of the criteria required in ToR.

A. RELEVANCE

EQ. To what extent project is relevant to the country context?

The relevance of the project comes out of its focus on the need to strengthen the role of CSOs in their capacity to conduct a viable dialog with their national governments, while monitoring anti-corruption policies. Beyond this a central feature of the project was its regional approach towards the problem.

In *Armenia* the oversight of the policy revealed incorrect definition of Col and it needed to be modified. Only high ranked officials are subject of Col policy and the document is rather declarative rather than enforced.

Moldova is the country with a Law on Col, expanding on local and central level for public authorities. It actually represents a fully package with mechanisms of functioning, sanctions and special institution National Integrity Commission is being responsible for the oversight. However, the institution has modest experience in identifying and sanctioning public servants and its legal framework as well is very contradictory and requires rectifications.

In *Poland* the oversight of the policy revealed that there is no notion of Col policy in the legislation, even though there are clauses of incompatibilities of public servants being in the central government. The expertise showed that clear clauses of Col might be included in the contracts of public servants and sanctions could be sufficient to diminish its negative impact.

In *Ukraine*, due to government changes the Law on Col waited to be adopted by Parliament but at the time of elaborating the law, there was no anti-corruption body and no sanctions could be applied while breaking the law.

Given this un-equal context and the conclusion of expertise that “there is no one size fits all” policy to be implemented to all 4 different settlements, the proposals for improvement of national legal framework varied from one country to another: for Armenia and Ukraine it was relevant to create specialized institutions being able to

supervise the Col and in Moldova and Poland there was a need to come up with concrete recommendations to the policy implementation.

Thus, the project team has adopted a strategy given the needs of each project beneficiary. The TI-M team came with ideas and practices applicable in each separate case, building partner self-confidence and adjusting the methodology.

EQ. What are the innovative approaches developed by the project?

Based on desk review of project documents and according to all participants in the evaluation process the evaluator finds that the key innovation element in the project is the regional partnership strategy and by extension, the opportunity given to civil society within the region to learn from the shared methodology while monitoring the implementation of Col policy process. The partnership was equally a key driving force, increasing the visibility of the project, ensuring its relevant implementation and monitoring at the country level, facilitating the transfer of knowledge and positive practice across the region.

EQ. Was the operation in line with EC development policy and strategies?

The Project is committed under Non-State Actors and Local Authorities in Development (Development Cooperation Instrument) and ENP Instrument and thereby fully aligned with EU policy for the sector. It brings additional contributions to fostering the EU strategy for the country, by mobilizing pro-European groups in the four partner areas (Armenia, Moldova, Poland, Ukraine) and forging networks between them as well as bringing them on study visits to Europe. The Development and Cooperation Instrument and ENPI are designed strengthen the capacities of non-state actors actions in partner countries (Multi-country). Building on the key strength, which is the ability to operate without the need for host government consent, the funding instruments are able to focus on sensitive political issues and innovative approaches and to cooperate directly with local civil society organizations which need to preserve independence from public authorities, providing for great flexibility and increased capacity to respond to changing circumstances.

B. EFFECTIVENESS

The project made a strong contribution to achieving the three specified objectives with 6 major outcomes, with the provision that in the absence of domestic funding for CS - none of them will be fully sustainable without continued international support.

While analyzing intervention logic and the links between the outcomes, outputs, activities and inputs, it comes out that the project has targeted interested parties as NGOs, central and local authorities as well as mass-media representatives.

The findings of the final project evaluation proved that the project managed to deliver planned results and reached all of the specific objectives with no exception. The specific objectives and actions carried out established cooperation at international level and developed a tested model of approaching while monitoring of government activity from the civil society perspective, which can be replicated by various organizations when planning their monitoring strategy for the anti-corruption policies followed by the public authorities. All in all, 72 CSOs enhanced capacities of

monitoring the implementation of Col policies in 4 partner country, out of which 6 NGOs worked directly with CPAs and 12 grass-roots NGOs worked with local administration. In the same time 12 took part in the sub-grants activities from all 4 regions. There were produced 4 monitoring reports for CPA and 12 reports for LPAs. A number of 35 policy recommendations were produced and being emphasized in 100 public events(trainings, conferences, planning meetings, summer camps). The recommendations have been promoted for a number of 51 central public institutions including other 12 local public institutions.

The project managed to improve the quality of Col policies at the level of CPA and LPA in all 4 countries through following specific objectives and actions. Please see below the description of the achievements per each specific objective:

Specific Objective 1: To enhance the monitoring practices of Col policies at central and local level in four countries. The activities carried under this specific objective have been highly scored.

The first output was set to increase partner CSOs capacities for a better monitoring of Col policies. A number of 6 partner CSOs were subject of training while absorbing the methodology delivered by TI-M and experts from National Integrity Commission from Moldova in monitoring framework regulating Col policies, have strengthened their capacities to monitor the implementation of above mentioned policies and gathered knowledge of how to conduct surveys and focus groups engaging central and local authorities.

The second output of this specific objective resided in providing national reports describing Col framework in 4 countries national legislation. Each partner country conducted it's own expertise on the legal framework of implementation of Col provisions. The conclusions resided in imperfect legal framework and each country has chosen it's way of ensuring carrying out expertise in the targeted public institutions, including opinion polls among public servants; as such their awareness and tolerance about Col policies have been measured as well there were identifies units where the Col policies were less respected. Partner countries have chosen out of accomplished methodology different examples of expertise as conducting opinion polls among heads of the institutions and comparing it with the public servants results. The final stage included focus-groups activities with PR, law-enforcement institutions and other experts to elaborate policy proposals.

While delivered methodology through this activity represents an innovative impetus for the involved partner CSOs it was raised a necessity to sum all of the results in a mid-term action after the first year of project implementation. The mid-term meeting had a clear purpose to exchange country experience on how to better involve grass-roots CSOs in delivering proposed results.

Thus the implementation of this specific activity suffered some adjustments, given the fact that no financial resources were disbursed for mid-term activity, TI-M accomplished to successfully increase funding from National Endowment for Democracy resources.

As a result of the actions it was proved that the legal framework differs from one country to another, moreover, the results showed that the legal framework needs

serious improvements. The recommendations relied on creating institutions in charge of Col policies (the case of Armenia and Ukraine) and concrete recommendations to improve policy implementation in Moldova and Poland. Beyond this, all of the involved NGOs (total 6) have increased their reputation with public institutions and the international community enabled it to establish closer links between government and CS sector. Support for the implementing NGOs also assisted it in the production of the policy inputs (petitions, policy papers and contributions to draft legislation), offered access to the policy process. Partner NGOs were invited to participate in the working-groups while elaborating amendments to existing laws or elaborating draft laws.

In conclusion, outputs produced in this specific objective represent important findings for mainstreaming partnerships with central public authorities and CSOs and working hand in hand while monitoring working processes.

Specific objective 2: refers to promoting changes in the legislation and practices related to Col policies in close partnership with public authorities. The second objective was one of the most complex one and it was achieved accordingly with the project design and, in the opinion of the evaluator, it represents one of the key strengths of the evaluated project. Evaluation proved that the project managed to deliver key to promote changes in the national legislations while creating and involving key public authority actors in a constructive dialog.

The first output was to provide expertise whether national legal framework complies with European standards of Col policies. It is to be mentioned the well designed and adopted strategy of each partner country on establishing dialog with CPA in order to achieve qualitative changes. To ensure this specific output the expertise included a series of comprehended questions to be addressed within the conducted polls of CPA organized in each country. The evaluation concluded that the adopted strategy was well reasoned and included “right questions” to be tackled (see annexes of report with questions). Each country partner (total 4) compelled national analytical reports discussed in close collaboration with central authorities. Projected 12 institutions (3 institutions from each country) achieved 42 institutions/ministries targeted. As a result, the awareness over Col policy was evaluated and emphasized proposals to improve practices of this policy and passed to the heads of institutions.

The evaluator concluded that the project was quite effective in its efforts to strengthen the position of civil society, in cooperating with state bodies.

Specific Objective 3: refers to increasing public awareness on conflict of interest situations at local and national levels. In order to increase and rise awareness over the respect to Col regulations a total of 83 public events (workshops for SCO and media outlets, round tables with public institutions, open letters, flash-mobs, press-conferences, leaflets etc.) have been organized with a total of 2,700 participants. For increasing the bottom up approach and spreading the practices to local level, small-grants program has been initiated in each country and organizations with experience in providing sub-granted have taken over the responsibilities of initiating the contest. The action had a deepen impact since it succeeded to provide trainings for 66 local NGOs (planned 20) 22 for Moldova, 19 Armenia, 20 Ukraine and 5 in Poland. The trainings has been relevant and adopted the framework of notions and principles of

Col policy, anti-corruption measures, incompatibilities for persons holding public positions etc (see annexes of report). Thus, the activity was relevant to the action since it increased local NGOs capacities of monitoring Col, advocacy capacities and opportunity for applying to small grants program.

The small grants program - was particularly significant in enabling the project to achieve its objectives under this outcome. Through the 12 projects supported, new mechanisms or approaches to cooperation between CSOs and the local government administration were adopted in 4 countries. The relevance of the small-grants activities brings added value to each separate country in particular and for example:

- *In Armenia - young journalists were involved in the action to investigate Col in public procurements and contracting of regional governments which revealed number of problems such as contracting companies owned by mayors, prime-minister and other close relatives.*

(Please see the report and annexes of description with grantees achievements).

Overall, the evaluators are satisfied that the project met its objectives under the third outcome. The evaluation team was able to confirm the value of the small grants through its documents and reporting from the grantees; the local NGOs identified more than 60 cases of Col, proving their capacities of approaching to public institutions, worked in partnerships with mass-media and investigative journalism

Having said this, the achievement of the project in bringing the CSOs closer to the centers of decision-making and ensuring that it was well-represented in mechanisms for coordination between government and non-government stakeholders, was of real value. The project facilitated the establishment of new mechanisms to institutionalize cooperation between the CSOs and relevant government agencies. These accomplishments are well-summarized in the Final Report, and confirmed through interviews and document review for the evaluation. Hence, it may be concluded that the project has succeeded to the extent possible under current circumstances in realizing the results summarized under the specific objectives.

C. EFFICIENCY

Cost effectiveness of the project

The cost-effectiveness was examined in terms of the overall project costs and the major project activities and savings. The evaluation findings show that the resources were invested in the project (human resources, researches, seminars, small grants etc) adequately and sufficiently in terms of reaching the planned results of the evaluated project.

The desk review during the external evaluation revealed that the management of the project respected financial management and procurement procedures and open selection/tenders were properly organised. The project procurements and costs were mostly in accordance with the adjusted budget lines. The resources were used economically and the project follows the established project management procedures.

Analysing the budget breakdown of the project costs in relation to specific objectives and complexity of activities carried out within each of the project component, one can conclude that the distribution of costs is also appropriate.

The evaluator concluded that the financial resources were used economically and project followed the established project management procedures. The evaluation did not find any alternative services and resources available locally, which could be provided at fewer expenses and which would be more economical for the project.

In sum, the project has performed well in achieving results in a cost-effective manner, and used appropriate delivery mechanisms.

Efficient use of resources and timeliness of outputs

A fundamental principle noted in the project's efficiency is to work through and use public and local community resources/contribution. This is an integral part of the partnership arrangement with the key stakeholders/grantees and it was a precondition for all applicants. The project outputs to-date, in most cases, have been provided on time and point to an efficient use of project resources and the scale of work that has been developed with numerous local stakeholders.

The external evaluation cannot recommend any feasible options for costs reduction and costs saving alternatives for reaching the project results with less input.

The project represents a good example of how one can achieve, if tries to be creative and hard about an effective involvement, partnership building, and even buy in and ownership. It is to mention that the project managed to mobilize local actors with in-kind contribution from CPAs and LPAs.

Project management and coordination support

EQ: Have TI-Moldova managerial support and coordination mechanisms effectively supported the delivery of the project? Did the project have effective monitoring mechanism to measure progress towards results?

Project Management by the TI-M

Evaluation findings show that the management provided by the TI-M project team scores, mostly good marks for the management and delivery of the project activities. It was noted from discussions that the composition and size of the project team was adequate for implementing the broad range of activities in the project supported by the use of subcontracting arrangements for specific work. This was achieved through clear lines of responsibilities defined for each team member, and preparation of their own work plans. The project team has undertaken the necessary measures to involve key strategic partners in the project design and throughout the project implementation process.

The management of the project proved to be a flexible one and the project activities and time table were adjusted when needed and financial resources reallocated.

Quality of Monitoring and Reporting

The project followed the monitoring procedures, which include plans and field visits for monitoring the project and midterm reports.

Monitoring by the Project Team in Moldova included regular meetings of the project team to update on project progress and address upcoming issues.

The quality of reporting as demonstrated in the report shared with the evaluation team is assessed as comprehensive, action based and of appreciable quality. The report describes the project implementation process and project performance and preliminary achievements.

Project coordination with key implementing partners from Armenia, Poland and Ukraine

The key implementing partners expressed overall satisfaction with the project management and the TI-M project team, including their constructive communications. They commended the efforts of the EEFM project team and remarked *“It was not easy to coordinate such a multi-country assignment, but any issues on project matters were discussed and addressed as appropriate”*.

Partnership strategy

EQ. What was the role of key partners implementing the project?

The project was conceptualized and submitted as a joint effort of Transparency International-Moldova, Armenia, Ukraine and Poland.

The leading applicant and the coordinator of the project is Transparency International Moldova, the other organizations being formal partners and project focal points at the country level: Transparency International and Institute for Public Policies from Ukraine, Eurasia Partnership Foundation and Transparency International Anti-Corruption center from Armenia, Stefan Batory Foundation in Poland. The evaluator concluded that all partners fully respected the principles of good partnership required by the European Commission.

The decision making process in the project has been twofold and at least two mechanisms were identified by evaluators:

- **At the strategic level:** An Advisory Committee was set up for overseeing decisions and results, as well as providing guidelines for follow up actions. The members of the Committee were appointed as follows: executive director of TI-M and project coordinators from each partner organization.
- **At the operational level:** A project management board was set up by TI-M and chaired by TI-M executive director, involving local coordinators, assistants and financial managers from each partner organization. Coordination meetings were held as initially planned and the communication was maintained through skype.

All six organizations have complementary strengths, which was of utmost importance for project design and implementation. TI-M took the lead on planning, overall project management and monitoring in the implementation. Each partner implemented project activities at the country level and had the role of liaison organization between the country beneficiaries and the advisory committee.

D. SUSTAINABILITY

EQ1. What was done by TI-M to ensure the financial, institutional and policy level sustainability?

The sustainability is a component widely described in the project document and this part of the report builds around planned measures versus achieved results in terms of sustainability at the end of the financial support. Evaluation revealed that measures have been taken by TI-M project team and project stakeholders to instil confidence of efforts made and the achievements obtained by the project prove sustainable.

TI-M mission revolves in strengthening anti-corruption strategies and policies thus making the government accountable. In order to ensure **the financial sustainability** of this initiative, TI-M widely promoted the program objectives and results among donors and involved NED along the project implementation.

TI-M is on a current basis seeking for additional resources to support and expand the initiative and is currently applying to different donors from the country and outside. To ensure **institutional sustainability**, the project mobilized and strengthened informal partnerships with Central and Local Public Authorities which will result in efficient communication of joint initiatives in the future.

In the opinion of the evaluator, these are important sustainability prospects and should not be underestimated.

Policy level sustainability was maintained by the local partners through continuous monitoring to ensure that commitments made by the authorities are followed through. It is worth to mention that during project implementation the project context changed dramatically. Starting with the Association Agreements signed and ratified by Moldova and Ukraine, the war in Eastern Ukraine and Crimea annexation, deviation of Armenian government regarding their European path - all this had an influence on decisions taken by the management. All this changes were consciously monitored by the management team and certain actions have been taken in order to minimize the impact of the changes on expected results and activities of the action.

EQ. What actions (risk mitigation strategies) have been taken to improve project sustainability?

To minimize the risks to project implementation, several mitigation actions have been taken over:

- Adjusting monitoring methodology provided by TI-Moldova;
- Deep explanation of rules and procedure of implementing EC/EU projects for the partners not having previous experience implementing partnership projects;

- Lack of country expertise on Col policies made the process of selection of expertise more time consuming while analyzing each possibility;

It is worth to mention that some financial risks were also foreseen, bank regulations vary from one country to another. Thus, TI-M took this risk with caution and supervised all of the transactions verifying each possibility

An answer to many ignorance of CPA involvement it was the practicing of public diplomacy and deep insistence from implementing organizations through reaching the head of institution and demanding involvement in the activities;

Even though certain activities started with a delay, TI-M managed to handle it by adjusting timelines and fine tuning methodology.

RESULTS AND IMPACT

The most important contribution of the project in the TI-M team was to achieve constructive dialog between CSOs with public authorities through a series of monitoring “exercises” conducted at national level in 4 countries. This exercises of providing expertise on implementation and monitoring of Col policies demonstrates its strengths and could be applied further on in different countries of EaP and EU.

EQ: To what extent have stakeholders been satisfied with the results?

The final evaluation showed that interviewed stakeholders, especially representatives of grantees expressed a high level of satisfaction with the results achieved within the evaluated project.

At the key strategic partners level stakeholders expressed full satisfaction, mentioning that the project was an innovative initiative and the main purpose of it was a valuable one. They confirmed that the project managed to build cooperation between the civil society actors and LPAs and admitted that monitoring CPA was more challenging, but they are satisfied with the results achieved by the civil society organizations.

At the “grass roots” level the NGOs/community expressed a high level of satisfaction mainly due to the capacity building events, tangible results achieved and partnerships created by their projects. Many of them affirmed that the project provided a unique experience for them, which generated good results and satisfaction from the activities and performances achieved during implementing the action. As well they have expressed the necessity of on-going monitoring of LPA expressed in “eyes opening” interventions in order to achieve proposed results. They would prefer to benefit from small grants for implementing their ideas as results of their capacity building activities.

Thus, it can be concluded from the focus group discussions and face to face interviews, that overall stakeholders are mostly satisfied with the project achievements and the majority of them expressed the willingness to continue collaboration with the TI-M.

EQ: What were the key approaches and strategies the project used in achieving its results? What worked and why?

The project used a variety of key approaches and interventions to achieve the expected results: coordinating meetings, expertise, opinion pool, capacity building trainings, focus groups, small grants public awareness initiatives and advocacy campaigns . All of them prove to be mostly effective. The project also used several strategies toward achieving its outcomes. The key strategies that have worked well and can be taken forward for the next follow up initiatives include the following:

- *Partnerships*

A significant initiative of the project was aimed at building national and regional partnerships with the civil society actors (NGOs and Central Public Authorities) for maximizing the effects of the Civil Society level in implementation of Col policies of CPAs. This strategy is closely aligned with EC/EU principles which call for “partnerships of civil society actors, local and regional civil society organizations and media outlets”.

Partnerships and a multi stakeholder undertaking (dialogue, pooling knowledge, international/national expertise and resources, and drawing on comparative advantage of actors) has been a core theme in the project aimed towards monitoring the Col policy improvements: Central and Local Public Authorities and CSOs including randomly media outlets.

- *Expertise and surveys*

This strategy brought added value to the project, even if it encountered some implementation difficulties in country as Armenia for example and influenced the implementation time table, i.e. generated delays. The project adjusted its initial strategy and produced valuable outputs (altogether 5 outputs), which should represent in the opinion of the evaluator baselines for future similar monitoring of policy activities.

- *Capacity Building of the key stakeholders*

Another key strategy that the project applied and one which worked well, *is capacity development of key stakeholders* through the capacity building training. Capacity development initiatives encompassed civil society actors. The pre- and post-evaluations of capacity building activities showed a significant increase in the level of knowledge of project beneficiaries. In addition to this, the feedback provided by the stakeholders proved that the capacity building events were one of the success factors of the project, which augmented the capacities of the partners (transferred knowledge, developed skills) and consolidated the NGO in their path to ensure anti-corruption activities and government accountability.

- *Small Grants*

In the opinion of the evaluator, confirmed by the stakeholders, this was one of the successful strategies of the project, because it boosted initiatives and provided palpable support for “grass roots” level monitoring initiatives. This strategy increased the civic participation and generated tangible results (described above) delivered jointly by the civil society actors from Moldova, Armenia, Poland and Ukraine.

PART IV. LESSONS LEARNED and RECCOMENDATIONS

EQ: Are there any lessons learned that can be taken into consideration in future programming by TI-M?

At the outset of this final evaluation report section, it is important to emphasize that the project, was an ambitious, relevant, mostly structured and a flexible initiative, which represented a multi-stakeholder and bottom-up approach. The soft-approach handled by the partners in consolidating a dialog with public authorities produced constructive results in achieving project objective.

TI-M as a lead took the initiative and became a key implementer of the activities and assumed coordination of each activity with each partner organization separately.

In the opinion of the evaluator, the project provided some best practices and there are lessons that should be learned by all key actors involved in the project, specifically by the EU as a donor and TI-M key driving force of the initiative:

- Individual approach to each target group is a key aspect in the successful implementation of such multi-dimensional projects;
- monitoring governments accountability is a long term process and it requires step-by step well focused intervention and more initiatives as well as long-term support. Evaluator concluded that the project created all pre-requisites for monitoring Col policies while increasing capacity of CSOs in the field of anti-corruption;
- since there are differences of the national framework in each country changes adopted varied from one country to another, thus demonstrating that each partner needed specific approach to the issue;
- partnership with TI-M is very important as it already has the capacity and instruments to implement projects in geopolitically fragile environments.

The evaluator concluded that the project managed to score well under the three specific envisaged objectives.

Overall, evaluator delivered allplanned results. The project managed to boost the capacity of civil society organizations from the region to meaningfully participate in monitoring Col policies, to bring expertise and to strengthen the role of CSOs in creating viable mechanisms of supervising government accountability.

RECOOMENDATIONS

- Emphasize project experience and share it with EaP and EU countries: civil society actors can act as a key agents in providing a constructive dialog with CPAs and LPAs while providing inputs to legislation, thus it can be replicated in relevant country contexts in EaP and EU;
- Use country reports, policy proposals, amendments to existing laws and survey and other studies carried out in the project for development of other development initiatives: all the findings under the project such as opinion polls, surveys, law amendments, findings in the country legislative frameworks on Col - all these information should be used in future similar initiatives;
- Improve communication and create synergy with similar initiatives: communication should be enhanced between similar initiatives, with the same priorities and involve the same or other donors and involving the same and other beneficiaries in confronting similar problems;
- Maintain the four country partnership approach and TI-M as key applicant. Plan more exchange and study practices in the countries involved in the project (Armenia/Moldova/Poland/Ukraine): considering TI-M experience and good-practices implemented so far, TI-M is recommended to remain as the key applicant and a viable partner of fundraising for future initiatives;

V. CONCLUSIONS

This part of the report provides some conclusions based on the findings and conclusions of the external evaluation and are set forth for TI-M team, key strategic partners and other stakeholders to use in a follow up project, if this is considered most feasible. The recommendations refer both to operational and strategic issues.

1. With the adoption of amendments to existing Col policies, the grantee demonstrated that there was created an opportunity for CSOs to play a central role while tackling anti-corruption initiatives.
2. The project strategy for strengthening CSOs capacity, monitoring government activity, providing expertise and engaging smaller, less-experienced organizations in anti-corruption initiatives- represents effective way of implementing the project;
3. In terms of its contribution to achieving the 3 specific objectives set by the grantee, the project performed strongly. It increased and strengthened the capacity of CSOs while monitoring Col policies in CPA and LPAs; promoted changes through providing deep expertise of the legal framework in each country; it increased public awareness through engaging media outlets in reflecting it into the press;
4. The small-grant initiative was a successful one and provided grass-roots NGOs to practice their capacity in monitoring LPAs accountability;
5. The project did well in achieving the outcomes set by the grantee in engaging CSOs in monitoring Col policies, while also enhancing the quality and extensiveness of its work in advocacy and public dialog with the government
6. A centerpiece of TI-M efforts to build the capacity of partner NGOs (total 5) through shared TI-M shared methodology and subsequently provide training for local 12 NGOs that received small-grants. By providing preliminary training and financial support, the project assisted in enhancing their skills in project design

and implementation, while also contributing to their self-confidence in undertaking advocacy initiatives with their LPAs.

7. One of the vehicles through which the project demonstrated the positive role that might be played by the CS in monitoring anti-corruption policies was the preparation of the 4 monitoring reports on progress made by each countries regarding Col policies. The reports revealed expertise on the status of implementation of Col policies in different countries and as a general remark it emphasized the lack of attention by most public institutions given to implementation of Col policy.
8. The project supported 2 coordination meetings (Kiev and Erevan) and one reporting/closing event in Brussels. All 3 activities were well-planned and effective.
9. The project was rated very highly for its efficiency and professionalism in the management of operations and of the budget.

EVALUATION QUESTIONS

EQ. To what extent project is relevant to the country context?

EQ. What are the innovative approaches developed by the project?

EQ. Was the operation in line with EC development policy and strategies?

EQ: Have TI-Moldova managerial support and coordination mechanisms effectively supported the delivery of the project? Did the project have effective monitoring mechanism to measure progress towards results?

EQ. Was the operation in line with EC development policy and strategies?

EQ. What was the role of key partners implementing the project?

EQ. What was done by TI-M to ensure the financial, institutional and policy level sustainability?

EQ. What actions (risk mitigation strategies) have been taken to improve project sustainability?

EQ: To what extent have stakeholders been satisfied with the results?

EQ: What were the key approaches and strategies the project used in achieving its results? What worked and why?

EQ: Are there any lessons learned that can be taken into consideration in future programming by TI-M?