

TERMS OF REFERENCE

Monitoring and Learning Agent for the International Action Against Corruption Programme

Section 1 Introduction

DFID seeks a Monitoring and Learning Agent (MLA) for the **International Anti-Corruption Programme (I-ACT)**. The MLA will provide a monitoring and adaptive learning function to the I-ACT programme. The core tasks of the MLA will be:

1. To monitor and systematically report programme outputs and (where possible) outcomes;
2. To gather available evidence to support programme reporting (including Annual Reviews), and lessons from partner learning day report (learning day to be contracted separately);
3. To inform on-going operational decisions about programme delivery; and,
4. To identify synergies and innovative approaches to anti-corruption and transparency between I-ACT and two other DFID centrally managed programmes (CMP).

The MLA agent will focus on the **I-ACT** programme but will also gather information (through available reports) from 2 other CMPs **MODAC** (Mobilising Data for Anti-Corruption) and **FAST** (Fiscal Accountability, Sustainability and Transparency).

I-ACT is a multi-component programme which started in August 2017 and will run through to 31 March 2021. It makes fighting corruption a top priority for the international community to address the impact of corruption on the poorest countries and people. It will follow through on Anti-Corruption Summit actions aimed at preventing corruption, ending impunity, and empowering those who have suffered from it. It will focus on strengthening the international architecture and response on anti-corruption and will include work with new digital technologies to strengthen civil society in partner countries. The programme was preceded by a very similar Year 1 programme, which funded the same implementing partners to start delivering Summit commitments shortly after the London Anti-Corruption Summit in May 2016.

Further details on DFID's approach to tackling corruption, and how IACT, MODAC, and FAST contribute towards this are presented in **Annex A**. Annex A also provides an overview of IACT's organisational structure, impact, outcomes and outputs.

Section 2 Purpose, Scope and Objectives

2.1 DFID's requirements for Monitoring and Learning (MLA) agent

The purpose of the IACT MLA is to support the IACT team to generate timely, evidence-based learning. This will be focussed primarily at the output-level and be delivered through the creation of a systematic monitoring and results reporting system.

The primary output / deliverable from the monitoring and results reporting system will be an **Annual IACT MLA report** which feeds into the IACT Annual Review (AR) process. The MLA will be expected to generate robust and timely evidence and learning on IACT output-level results in a format that supports the DFID AR process and format.

Beyond the monitoring and results reporting system, the MLA is expected to design and conduct a range of wider, complementary evidence generating and lesson-learning activities, potentially including key stakeholder interviews and focus groups, collection and analysis of secondary data, and document/literature reviews. Some resource should be allocated for

annual (agent may recommend more frequent visits) field visits to countries where the 3 CMPs overlap (Nigeria and Kenya).

Beyond the IACT AR process, the monitoring and results reporting system will also support wider IACT programme results-reporting and learning including:

- Reviewing and updating the programme Theory of Change (ToC) and the programme logframe collaboratively with the IACT SRO and programme team;
- Develop a programme Value for Money (VfM) framework (Inception Phase) and report against the framework annually;
- Verify the evidence and results emerging from the existing MODAC and FAST programmes, and combine with results and evidence generated from the IACT results reporting system;
- Define IACT-output level results and IACT's contribution to outcome-level results;
- Contribution to discussions on IACT course correction to support on-going operational decisions through an approach which build on adaptive management;
- Contribution to discussion on IACT strategic and design decisions including programme theory of change, designs and workplans;
- Learning on the synergies and potential innovations between IACT, MODAC and FAST; and,
- In line with DFID policy on cross-cutting issues, MLA results and lesson learning will be expected to be disaggregated by gender wherever data is available. In line with the Implementing Partners, the MLA results reporting and lesson learning is expected to be in line with international anti-corruption reporting standards and commitments.

The MLA will feed into two Annual Review cycles (2019 and 2020). In 2019 the MLA will support the DFID AR by providing comments by end-October on the draft (if possible) in advance of the AR completion. In 2020 the MLA will lead the data collection and analysis process supporting the AR. The MLA will also feed into the IACT Programme Completion Review (PCR) in 2021. The PCR process will include reporting on the synergies and potential innovations between IACT, MODAC and FAST.

2.2 The MLA Agent should:

- Design and operate an IACT monitoring and results reporting system as the primary evidence generating mechanism to define and assess IACT results;
- Be able to assess and discuss the strength of evidence supporting IACT results and learning, including triangulating evidence from different sources in order substantiate MLA new knowledge and insights on IACT;
- Be familiar with the rapidly evolving field of flexible and adaptive management, and programme learning for agile course correction;
- Combine expertise in monitoring, results reporting and learning, with a state-of-the-art understanding and insight into anti-corruption and transparency as approached by DFID and wider across UK Government;
- Present an MLA Team which is gender-balanced and comprises international and country-specific expertise in anti-corruption and transparency policy and programming; and,
- Be able to work flexibly and collaboratively with the IACT centrally managed team at DFID and relevant DFID and HMG country teams.

Section 3 MLA approach and methodology

3.1 The MLA approach

The MLA will become familiar with the full context of the programme. The MLA will work with both the IACT Management Team based in DFID (UK-based) as well as IACT's implementing partners and DFID country teams. For some IACT components (each output has several components) the implementing partner will be undertaking monitoring, results reporting and lesson learning themselves. In these instances, the MLA will play a role in externally validating their results. For other components the MLA will undertake the design and delivery of the monitoring and results reporting themselves. The MLA will need to devise an approach which seamlessly combines monitoring/results reporting with tailored and timely learning.

The primary source of data will be IACT implementing partner routine results reporting data, largely against the IACT logframe. This data is considered to be sufficiently robust, consistent and complete across all three programmes to form the foundation of MLA datasets. This primary dataset is expected to be supplemented by the MLA's own qualitative and quantitative data collection processes.

3.2 The MLA methodology

The MLA will need to devise an approach, method and set of monitoring and learning tools which combine elements of and builds off:

- The IACT logframe indicators;
- The 2016 Anti-Corruption Summit commitments / UK Government National Anti-Corruption Strategy; and,
- OECD-DAC evaluation criteria – particularly efficiency, effectiveness, relevance and sustainability.

The MLA method will need to cover the following indicative aspects:

- Coherence of the set IACT activities, outputs and outcomes;
- The extent to which IACT indicators can effectively measure achievement of the set results (outputs and outcomes);
- The extent to which IACT monitoring results-reporting tools (both MLA-led and Implementing Partner led) support collection of useful and relevant data to inform DFID Annual Reviews, the Programme Completion Review, ongoing programming learning, as well as shared learning between IACT, FAST and MODAC;
- Cycles of results reporting and learning engagement covering:
 - The Annual Review process;
 - Partner Learning days (will be contracted separately) – participate and build in lessons learned;
 - Interaction between IACT, FAST and MODAC results reporting through the comparative case study introduced below;
- Overall approach to MLA learning – how evidence from monitoring and results reporting is translated into knowledge and learning – and packaged / shared / disseminated according to key stakeholder knowledge needs and at annual learning days for partners (learning days will be conducted by another supplier supported by U4). The MLA should consider approaches which build on the concepts of shared learning and the 'co-generation' knowledge.

The MLA will present their approach and method, as well as reporting cycles and deliverables, in an IACT MLA Inception Report within three months of contract signature and at the conclusion of a three-month IACT MLA Inception Phase.

3.3 Learning

Learning across IACT, FAST and MODAC - a comparative case study

As well as systematic IACT results reporting, the MLA will also design and deliver a formative and summative case study which assesses the comparative results, synergies, innovations and lessons across the three centrally managed DFID anti-corruption and transparency programmes IACT, FAST and MODAC. The case study will be conducted in two rounds – a formative first round following the MLA inception phase (November 2019) and a summative round (January 2021), will be delivered at the end of the IACT programme in line with the Programme Completion Review.

The design and method of the case study has not yet been defined and will be for the MLA to propose. As guiding principles, it should:

- Consist of two rounds – reflecting the results, evidence and new knowledge generated across all three programmes;
- Identify and explore existing and potential future synergies between the programmes;
- Identify and explore particular programme successes (possibly applying a method such as Positive Deviance to understanding the key factors underlying a particular success);
- Identify and explore particular innovations developed and delivered by the programmes in the fields of anti-corruption and transparency; and,
- Identify and present potential future directions for further DFID funding for influencing and programming in the fields of anti-corruption and transparency.

3.4 The IACT MLA support will consist of 3 phases

1. MLA Inception Phase
2. On-going monitoring and learning – focussed around the IACT Annual Review
3. Programme completion and case study

1. **Inception phase:** to improve the theory of change and result log frames for the IACT programme, scope data available from donor reports and other sources for all 3 CMP to develop a common narrative, identify key IACT partners and select countries, prepare draft communications plan and/or themes for case studies [qualitative / quantitative on direct /indirect impact including on gender / for vulnerable groups] and develop a value for money framework for IACT;
2. **On-going monitoring and learning phase:** to support the SRO IACT to verify results once a year and as part of the annual reviews. This will include support with identification and revising of appropriate indicators (every 6-months if possible) and monitoring processes by partners, external verification of partners' results (for selected components) and helping the DFID team identify areas for improvement and potential collaboration between components. Reviewing how components work together within programmes, identifying synergies between components and reviewing the relevance of planned interventions by delivery partners;¹ and
3. **Programme completion and case study:** comprising of the IACT final programme review of I-ACT by March 2021 (using DFID's programme completion report template) and wider IACT-FAST-MODAC case study – both formative and summative rounds - detailed above.

¹ MLA agent may focus on specific components of each programme rather than taking a broad-brush approach and addressing everything. Another focus will be reviewing progress in priority countries to assess relevance, including responsiveness to the political context and collaborating with HMG country teams to ensure coherence and country anti-corruption and transparency strategies. producing country case studies.

The MLA will run from approximately late October 2019² through to March 2021 with the aim of providing insights that will benefit DFID (both in terms of improving the implementation as well as improving the design of future strategies or interventions to address corruption) and the wider Anti-Corruption community.

3.5 IACT MLA stakeholders and primary audiences

The MLA should consider the audiences interested in any findings from annual review/ programme completion reports as follows:

- **DFID** – DFID’s priorities are to know whether the programmes have achieved their stated results and whether they have provided value for money, as well as any wider lessons about Anti-Corruption programming to inform future work. Designing effective value for money frameworks as part of the inception period will be vital. DFID will have unlimited access to the material produced by the MLA.
- **Host country governments** –who want to understand how to address corruption most effectively.
- **Managing partners** – A management partner will be part of MODAC’s management structure, overseeing implementation of the programme.
- **Implementing partners** – All three programmes deliver through implementing partners who will be interested in lessons on programme implementation and what works.
- **The Anti-Corruption community** – The wider community of organisations and individuals working on Anti-Corruption will be interested in any lessons on what works and what does not. Current evidence refers mainly to country efforts to tackle corruption. This programme could generate new knowledge about the effectiveness of international action to address corruption.
- **Wider HMG audiences** – Lessons from the evidence of these three programmes will be of growing value not only to DFID but to other HMG organisations that work on Anti-Corruption.

3.6 Breakpoints

The contract will be subject to one break point on 31 January 2020

Continuation of the services will be based on agreement of deliverables and on satisfactory performance (assessed against KPIs) and the progress of the agent against the specified outputs and in accordance with the agreed Contract Terms and Conditions.

The main contract review points will be:

Inception	
Receipt, review and approval of the Inception Phase Report with the following deliverables: <ul style="list-style-type: none"> • Revised IACT theory of change • Revised IACT logframe, • IACT VfM framework • MLA monitoring and results reporting plan, • MLA learning approach • MLA case study design 	Inception report within 3-months of contract signing.
Breakpoint	31 January 2020
Implementation	

² Earlier start date preferable if possible.

Receipt, review and approval of the MLA mid-term report on IACT (building on 2018 and 2019 ARs).	MLA mid-term report by 28 February 2020
Review point³	30 April 2020

At each point DFID reserves the right to terminate the contract in the event of unsatisfactory performance and/or delivery of outputs. DFID further reserves the right to terminate the contract in the event of substantial changes within the operating environment of the programmes.

3.7 Contract management arrangements

The MLA will be accountable to the IACT SRO⁴ and managed by a dedicated Programme Officer supported by the Programme and Policy Adviser (IACT ‘Deputy’ SRO) for day to day management of the contract. The MLA will also work with the FAST and MODAC Programme Managers under the overall coordination and guidance of the IACT SRO. The MLA is expected to work collaboratively yet independently with both the IACT SRO and the FAST and MODAC Programme Managers. Evidence and learning produced by the MLA is expected to be robust and independent, reflecting MLA views and expertise.

Section 4 Budget/Timeframe/Deliverables

4.1 Timeframe

The timing suggested below is flexible and can be adapted according to practicalities and the needs of the MLA. The MLA in their bid should indicate how they would /could manage the process.

1. MLA Inception Phase
2. On-going monitoring and learning – focussed around the IACT Annual Review
3. Programme completion and case study

4.2 Budget

The approved budget of £500,000 is split over each financial year until March 2021.

Phase	Estimated budget
Inception phase	• £100,000
2019 monitoring and learning	• £100,000 • £25,000
2020 monitoring and learning	• £100,000 • £25,000
2021 programme completion	• £100,000 • £50,000
Total	£500,000

³ Light touch review of deliverables to date and forward look to the last 12-months of the contract.

⁴ Also MODAC SRO

4.3 Deliverables

The following list of deliverables can be augmented by mutual consent in the inception period. The agent is free to propose a different set on deliverables in their proposal, if they see the need, but it is not required at this stage.

Inception Phase	Deliverables	Indicative Dates
Inception Report	Inception Phase Report	Within 3 months of contract signing
Revised IACT	VFM frameworks, Log frames, TOC reviewed and amended	Within first 3 months of contract signing part of the inception period.
On-going monitoring and learning	Deliverables	Indicative Dates
Receipt, review and approval of the MLA mid-term report on IACT (building on 2018 and 2019 ARs).	Mid-term report on IACT ⁵	13 December 2019
Formative first round case study following the MLA inception phase – reflecting the results, evidence and new knowledge generated across all three programmes (IACT/FAST/MODAC)	Case study available	31 January 2020
VFM, TOC, Log frames Reviewed in line with IACT annual review (November) 2019 and learning day (learning day will be facilitated by another supplier).	VFM frameworks, Log frames, TOC reviewed and amended as necessary	31 January 2020
VFM, TOC, Log frames Reviewed.	VFM frameworks, Log frames, TOC reviewed and amended as necessary	30 June 2020
Receipt, review and approval of second MLA IACT Annual Review report	MLA IACT Annual Review report	31 October 2020 (mid-October preferable if possible).
VFM, TOC, Log frames Reviewed in line with IACT annual review (November) 2020 and learning day (learning day will be facilitated by another supplier).	VFM frameworks, Log frames, TOC reviewed and amended as necessary	31 December 2020
Programme completion	Deliverables	Indicative Dates

⁵ In 2019 the MLA will not generate and analyse the data for the IACT AR due to insufficient time. This will be produced by the IACT programme. But the MLA will be expected to produce a mid-term report covering both annual reviews by February 2020. MLA will be offered the opportunity to provide feedback and comments on the IACT AR 2020 when shared.

Summative second round case study– reflecting the results, evidence and new knowledge generated across all three programmes (IACT/FAST/MODAC).	Summative case study.	31 January 2021
IACT programme review	Project completion report produced and agreed by IACT SRO, using DFID template as a guide.	31 March 2021

Section 5 Important to consider

5.1 UK Aid Branding and Transparency

Transparency, value for money, and results are top priorities for the UK Government. DFID has a duty to show UK taxpayers where their money is being spent, its impact, and the results achieved. DFID has guidance on the use of its logos, which will be shared with the Supplier(s) as necessary.

DFID has transformed its approach to transparency, reshaping our own working practices and pressuring others across the world to do the same. DFID requires suppliers receiving and managing funds, to release open data on how this money is spent, in a common, standard, re-usable format and to require this level of information from immediate sub-contractors, sub-agencies and partners. It is a contractual requirement for all Suppliers to comply with this, and to ensure they have the appropriate tools to enable routine financial reporting, publishing of accurate data and providing evidence of this DFID – further IATI information is available from: <http://www.aidtransparency.net/>

If any press releases on work which arises wholly or mainly from the project are planned, this should be in collaboration with DFID’s Communications Department. Country-facing and UK-facing branding guidelines will be provided by the respective DFID Programme Teams.

5.2 Overview of risks/challenges

The complexity of the IACT programme (13 live components covering everything from illicit financial flows, illegal wild life trade, stolen asset recovery, through to beneficial ownership and advocacy) and the limited availability of resources will require the agent to carefully consider how to undertake the tasks. The agent should consider and then present options to DFID, perhaps focusing in only on key components from each programme, perhaps relying on donor reports and other secondary data.

5.3 Overview of available data

All DFID project documentation for centrally managed and country managed Anti-Corruption projects are publicly available on Dev Tracker. Further research on Anti-Corruption is available from the U4 Anti-Corruption Resource Centre (<https://www.u4.no>).

- Evaluability Assessment for MEL
- The International Action Against Corruption programme (IACT) business case, log frame and annual review.
- Business case, logframe and project completion report for Year 1 programme, which immediately preceded IACT.
- FAST (Fiscal Accountability, Sustainability and Transparency) business case, log frame, annual review and donor reports.

- Mobilising Data for Anti-Corruption (MODAC) business case, log frame and annual review.
- Implementing partner reports to DFID?
- Report of first DFID learning day with IACT implementing partners.

5.4 Able to respond to scale up/down of 3 CMPs–

The contract must have adequate provision for variation to adapt to changes that occur during the life of the three programmes. Following DFID GOSAC reviews of the 3 programmes, DFID shall reserve the right to scale the programmes up or down over their lifetime to include potential changes to their programme scope, geographical and country reach and contract value (where appropriate).

Section 6 Supplier responsibilities

6.1 Duty of care

The agent is responsible for the safety and wellbeing of their personnel and third parties affected by their activities under this contract, including appropriate security arrangements. They will also be responsible for the provision of suitable security arrangements for their domestic and business property. The respective DFID Programme Offices will share available information with the Supplier on security status and developments in-country where appropriate. No other logistical support will be provided by DFID.

Bidders must develop their Tender based on being fully responsible for Duty of Care for the duration of the Contract, in line with the details provided above and the initial risk assessment matrix developed by DFID (see IACT business case). Bidders must confirm in the Tender that:

- They fully accept responsibility for Security and Duty of Care.
- They understand the potential risks and have the knowledge and experience to develop an effective risk plan.
- They have capability to manage their Duty of Care responsibilities throughout the life of the contract.

If a bidder is unwilling or unable to accept responsibility for Security and Duty of Care as detailed above, their Tender will be viewed as non-compliant and excluded from further evidence.

Acceptance of responsibility must be supported with evidence of capability and DFID reserves the right to clarify any aspect of this evidence. In providing evidence, Tenderers should consider the following questions:

- Have you completed an initial assessment of potential risks that demonstrates your knowledge and understanding, and are you satisfied that you understand the risk management implications (not solely relying on information provided by DFID)?
- Have you prepared an outline plan that you consider appropriate to manage these risks at this stage (or will you do so if you are awarded the contract) and are you confident/comfortable that you can implement this effectively?
- Have you ensured or will you ensure that your staff (if any), are appropriately trained (including specialist training where required) before they are deployed and will you ensure that on-going training is provided where necessary?

- Have you an appropriate mechanism in place to monitor risk on a live / on-going basis (or will you put one in place if you are awarded the contract)?
- Have you ensured or will you ensure that your staff (if any) are provided with and have access to suitable equipment and will you ensure that this is reviewed and provided on an on-going basis?
- Have your appropriate systems in place to manage an emergency / incident if one arises?

The MLA is responsible for ensuring appropriate safety and security briefings for all their personnel working under this contract and ensuring that their personnel register is up to date and they receive briefing as outlined above. Travel advice is also available on the FCO website and the Supplier must ensure they and their personnel are up to date with the latest position.

Conflict Affected Zones

This Procurement will require the agent to operate in conflict-affected areas and parts of it are highly insecure. Travel to many zones within the region will be subject to travel clearance from the UK government in advance. The security situation is volatile and subject to change at short notice. The agent should be comfortable working in such an environment and should be capable of deploying to any areas required within the region to deliver the Contract (subject to travel clearance being granted).

The MLA is responsible for ensuring that appropriate arrangements, processes and procedures are in place for their Personnel, considering the environment they will be working in and the level of risk involved in delivery of the Contract (such as working in dangerous, fragile and hostile environments etc.). The Supplier must ensure their Personnel receive the required level of training.

6.2 General Data Protection Regulations (GDPR)

Please refer to the details of the GDPR relationship status and personal data (where applicable) for this project as detailed in Appendix A and the standard clause 33 in section 2 of the contract.

Section 7 Framework Agreement

DFID will contract through the Independent Monitoring and Process Evaluation Framework Agreement (IMPERFA) and will be governed by its terms and conditions. This requirement will be a Direct Award under the framework, as per Terms of Reference Clause 37, whereby the next framework participant will be offered to undertake the detailed design and/or implementation of evaluation requirements under Lot 6 - Process Evaluation - Multiple and other regions and UK.

Draft Concept Note

Only on submission and approval of the concept note will DFID award to the Supplier.

For the purposes of this Framework a concept note is a document provided by the Supplier in order to demonstrate to DFID their understanding of the TOR, their approach and methodology to meeting DFID's requirements.

Contents

1. Understanding of the ToR (Est 1.5 pages)
 - Context
 - Scope
 - Questions
2. Approach and Methods (Est 2 pages)
3. Work plan (Est 1 page)
4. Personnel and days (Est 1.5 pages) **(based on contractual capped fee rates and any associated discounts)**

Review

Framework participants' performance will be reviewed annually against their delivery by PCD.

Suppliers will be requested to provide MI quarterly, measuring as to whether procurements are delivering:

- on-time,
- in-scope,
- in budget,
- to quality standards,
- making contribution to evaluation practice.
- MI results will be shared with the Cadre.

Appendix A:

Schedule of Processing, Personal Data and Data Subjects

This schedule must be completed by the Parties in collaboration with each other before the processing of Personal Data under the Contract.

The completed schedule must be agreed formally as part of the contract with DFID and any changes to the content of this schedule must be agreed formally with DFID under a contract variation.

Description	Details
Identity of the Controller and Processor for each Category of Data Subject	<p>The Parties acknowledge that for the purposes of the Data Protection Legislation, the following status will apply to personal data under this contract</p> <ol style="list-style-type: none">1) The Parties acknowledge that Clause 33.2 and 33.4 (Section 2 of the contract) shall not apply for the purposes of the Data Protection Legislation as the Parties are independent Controllers in accordance with Clause 33.3 in respect of Personal Data necessary for the administration and / or fulfilment of this contract.2) For the avoidance of doubt the Supplier shall provide anonymised data sets for the purposes of reporting on this project and so DFID shall not be a Processor in respect of anonymised data as it does not constitute Personal Data.

ANNEXES / DOCUMENTATION

ANNEX A – DFID’s approach to corruption

1.1 An overview of high-level corruption issues

Bribery. Bribes are one of the main tools of corruption. They can be used by private parties to "buy" many things provided by central or local governments, or officials may seek bribes in supplying those things such as.

- Government contracts.
- Government benefits.
- Lower taxes.
- Licenses.

Government benefits purchased with bribes vary by type and size. Contracts and other benefits can be enormous (grand or wholesale corruption) or very small (petty or retail corruption), and the impact of misinterpretation of laws can be dramatic or minor. Grand corruption is often associated with international business transactions and usually involves politicians as well as bureaucrats. The bribery transaction may take place entirely outside the country.

Theft, of state assets by officials charged with their stewardship is also corruption.

Political and bureaucratic corruption. Corruption within government can take place at both the political and the bureaucratic levels.

Causes of corruption are always contextual, rooted in a country's policies, bureaucratic traditions, political development, and social history, corruption tends to flourish when institutions are weak and government policies generate economic funds.

1.2 DFID’s approach to tackling corruption

IACT, MODAC and FAST are 3 centrally managed programmes that are necessary as corruption is a cross-border global phenomenon facilitated by a lack of transparency and accountability. Tackling it requires specialist expertise, not available in DFID or partner countries, and coordinated international efforts in multiple countries. Corruption is enabled by the ease of laundering funds across borders and hiding assets overseas, for example through secret contract deals and opaque company structures.

The 3 programmes work in parallel, tackling different aspects of the Anti-Corruption and transparency agenda. Successful implementation of the programmes, which are managed and implemented separately, but have naturally synergies at country level, should deliver the following results:

- Countries able to track and recover stolen assets to be used for development;
- Countries establishing registers, so citizens and investors can see who really owns and controls companies, which can be used to hide corruption, and 14 countries delivering this transparency for oil, gas and mining;
- Law enforcement within countries partnering with civil society and investigative journalists to use evidence from transparency to prosecute corruption cases;
- Shining a light on who is winning public contracts within countries, reducing the scope for corruption and making it fairer for businesses to compete;
- acting to make budgets more open and transparent and saving money on health contracting by making it more open and fairer.

IACT is designed to complement two other centrally managed programmes in line with the UK’s global commitment to anti-corruption. The following two programmes with IACT focus

on holding governments accountable on the illicit flow of finances, which is at the centre of everything we do in both our programmatic and policy work. These programmes set out to protect vulnerable groups addressing underlying poverty and return stolen assets back to their country, to advantage of the poorest and most vulnerable groups of people in countries.

Fiscal Accountability, Sustainability and Transparency (FAST)

This commenced in 18 September 2017 and will end 31 March 2022. The programme is to support the analysis of public financial management and the openness of governments in DFID priority countries about their financial transactions to help to identify financial risks and provide evidence for planning reforms. It aims to strengthen budget oversight, with a focus on supreme audit institutions and scrutiny on law-making, and the links with others who are part of the network of accountability. In addition to improving budget transparency, including open budgets and open contracting as key elements of financial accountability and management as well as the fight against corruption (with a focus on open contracting in the health sector). This contributes towards delivery of SDG 16 by developing effective, accountable and transparent institutions.

FAST will work initially in four countries that the UK has chosen as key partners in the fight against corruption: Ghana, Nigeria, Kenya and Tanzania

Mobilising Data for Anti-Corruption. (MODAC)

This will hopefully begin in February 2019 and will run until 31 May 2023. MoDAC's objective is to improve the quality and use of data to increase the number of high-level sanctions, penalties and prosecutions in corruption cases. It will enable information released through the transparency revolution, such as on company beneficial ownership, assets and open contracting, to be used on specific corruption cases. It will do this through funding partnerships between professional users of anti-corruption data in law enforcement, civil society, the media and private sector. Partnerships will "follow the data" on specific corruption cases or high corruption risk events (such as a high-value government procurement or extractives contract). It will work initially in four countries that the UK has chosen as key partners in the fight against corruption: Ghana, Nigeria, Kenya and Tanzania.

There are links between these different programmes because they focus on change of in practices that perpetuate corruption and the draining of assets from the countries. The MEL agent must be cognisant of the results of these centrally managed programmes and a key aspect of the work will be to develop a common overview of how they are working together or not with IACT. It is envisaged that this will be done in a light touch manner through case studies and for any in country visits it will be important where possible to link with the implementers of the other 2 CMPs.

Our main aim is to foster effective lesson learning that feeds back into IACT implementation and future design of a similar programme.

1.3 IACT's structure, impact, outcomes and outputs

IACT contains a range of implementing partners, which include international agencies (World Bank and IMF), NGOs, operational agencies (ECOFEL) and research bodies. IACT will support a range of outputs to **reduce opportunities for international corruption, expose corruption through transparency and hold corrupt actors to account to reduce impunity**. This programme assumes that this will reduce incentives for corrupt behaviour and ultimately deliver the outcome of reduced corruption in DFID priority countries. The UK is aiming to show what can be done by providing nimble specialist expertise so that others can draw lessons and demonstrate the role of integrity in international financial centres such as the City of London.

The ultimate expected impact of IACT will be to reduce poverty and enable greater prosperity through the financing for development made available from reduced theft and

leakages from the public sector in developing countries; the return of stolen assets otherwise lost through grand corruption; and a less corrupt business environment attracting investment and job creation.

The outcome will be:

- reduced incentives for corruption due to international partners working better together across borders and in country to close opportunities to hide the proceeds of corruption and increase transparency and integrity, and
- diminished impunity due to stronger cross-border financial investigations and greater accountability to local and international civil society for compliance with international standards.

IACT aims to achieve the following outputs, which are contained in the attached logframe.

Opportunities for corruption will be reduced through:

- Improving detection of money-laundering in developing countries and internationally;
- Increased capacity for developing countries to initiate and respond to mutual legal assistance requests to identify, freeze, recover and return stolen assets;
- Enabling UK businesses to invest and trade without bribery;
- Building integrity in defence ministries and defence contractors.

Transparency will expose corruption through publishing:

- Beneficial ownership information to show the real owners of companies;
- Information about oil, gas and mining contracts, revenues and commodity trading.

Corrupt actors will be held to account and victims reimbursed through:

- Civil society holding governments and companies to account for delivering and expanding on Summit commitments;
- Return of stolen assets to be reinvested in development.

ANNEX B - Evaluability Assessment

Findings of the Evaluability Assessment

DFID commissioned an external evaluability assessment of the three programmes. The assessment consisted of a literature review of the challenges and opportunities for the evaluation of anti-corruption programming, followed by lessons for the evaluation of the FAST, I-ACT and MODAC programmes and potential evaluation approaches for the three programmes. (See key assessment messages below).

After careful consideration of the assessment by SROs it was decided to have 3 separate monitoring learning and evaluation processes. For IACT it was decided to conduct a process and not an impact evaluation and that focus would be on verification of results and lesson learning to improve programme delivery in line Ministerial approval.

The key messages are:

- Corruption manifests itself in a way that derives from the social, political, religious and economic contexts of the country in question. Any Anti-Corruption intervention therefore needs to be grounded in political economy analysis to ensure it is responding to the specific context of the country it is operating in. It must be cognisant of the inequalities within society that lead to elite capture of resources and a lack of effective state citizen engagement to hold decision makers and those in power accountable. The programmes require robust political economy and context analyses.
- The evaluation should pay attention to the detailed motivations of partner organisations.
- Anti-Corruption programmes need robust and detailed theories of change, with explicit assumptions, and adaptable to context. The theories of change for the three programmes need revising.
- Corruption is a phenomenon that is generally 'hidden', so access to data to measure success for Anti-Corruption programmes is challenging. An assessment is needed of what reliable data is available for the evaluation of each programme.

There is a need to identify 'what works with regard to Anti-Corruption programming.

The evaluability assessment clearly stated that a single evaluation of all three programmes is not a viable option. Although the programmes are intended to join up, they have no common theory of change and are already individually complex. Therefore, the assessment instead recommends three individual programme level studies that are designed to be comparable on certain selected issues.

ANNEX C – Description of the 3 programmes

I-ACT

The International Action Against Corruption programme (IACT) will support developing countries to tackle grand corruption, which is the abuse of high-level power on a large scale, benefiting the few at the expense of the many⁶. IACT will support a range of implementing partners which provide experts, for example in financial investigations, anti-money laundering and asset-tracing to help countries prevent and expose these corrupt deals. They will work with developing countries and international financial centres to follow the money overseas so that it can be returned and reinvested properly to improve the lives of poor people. IACT will also promote greater transparency in company ownership to make it more difficult to hide corrupt international deals. It will shine a light on sectors most prone to corruption; oil, gas and mining and defence and security.

IACT will provide up to £34.5m over four years (including £6m from the Prosperity Fund) to deliver specialist Anti-Corruption technical expertise which is not available at country level and access to international partnerships to tackle cross-border corruption. It will work to shift incentives by better prevention, detection and exposure of corruption and recovery of stolen assets

FAST

FAST (Fiscal Accountability, Sustainability and Transparency) is DFID's central umbrella programme on PFM (Public Financial Management). The overall purpose is to deliver improvements in budget transparency and oversight to strengthen macroeconomic stability, improved accountability, reduced corruption and ultimately improved service delivery and reduced poverty. The total programme value is up to £16.4m up to 2021/22, spread across the five main components summarised below:

- **Open Contracting Partnership (OCP)** – the process of Government buying goods and services remains one of the main sources of corruption. To help address this, global standards/tools will be developed by OCP and up to 25 countries will be supported to make their contracting more open. This will shine a light on who is winning public contracts, reducing the scope for contracts to be given based on corruption/collusion and making it fairer for businesses to compete. Funding will support the OCP core team, scale up the number of experts to support country implementation and provide for research and occasional learning/advocacy events.
- **Transparency International UK (TI)** – the process of buying health goods is particularly susceptible to corruption. TI will pilot the application of Open Contracting principles specifically to the health sector. This will be tested in up to 5 developing countries to demonstrate impact. Money will be spent on the core TI health team and small-scale funding for local partners to support monitoring of health contracting data.
- **International Budget Partnership (IBP)** – FAST has two funding streams to IBP: (i) a new phase of core support for the Open Budget Survey and the promotion of budget transparency; (ii) recognising that transparency alone is not enough, the Strengthening Public Accountability for Results and Knowledge (SPARK) project provides funding and technical support to local civil society organisations to improve their ability to analyse budget information and push for improvements in budget allocation and service delivery.

⁶ Transparency International

- **International Organisation of Supreme Audit Institutions (INTOSAI)** – supreme audit institutions (SAIs) are the main body responsible for checking the way Government is spending money. Often SAIs are not properly independent from government, and lack the capacity to carry out this role. Funding will be provided to develop guidance and standards, and support supreme audit institutions with the implementation of these. The work will improve core audit capacity in an additional 30 SAIs, leading to greater scrutiny of public spending and reduced scope for misuse of public money.
- DFID provides funding towards its new Strengthening Public Accountability for Results and Knowledge (SPARK) project, which works in a number of countries, including Nigeria, to provide technical assistance and grants to CSOs with a view to maximising opportunities for reform.

MODAC

Mobilising Data for Anti-Corruption (MODAC) will put information released through the transparency agenda to use on specific corruption cases. MODAC will work (initially, at least) in Ghana, Nigeria, Tanzania and Kenya – all participants at the London 2016 Anti-Corruption Summit and is summarised as below:

- MODAC will fund partnerships between professional users of Anti-Corruption data. Partnerships will involve Law enforcement; civil society; the media; and the private sector;
- These partnerships will analyse and disseminate data on corruption in user-friendly ways in order to bring specific cases of corruption to justice;
- A Learning Component will be integrated into each data partnership. The point of the learning in MODAC is to get other countries and stakeholders to change their behaviour, beyond the programme's duration;
- The Learning Partner will regularly feed lessons into the potential HMG Innovation Hub and learning function in the Transparency and Accountability Initiative (TAI) for onward dissemination to non-MODAC pilot countries as part of this;
- MODAC will fund a small number of Practitioner Research and Learning Grants.
- MODAC ultimately will support better state citizen engagement by increasing accountability of decision makers to all the people (inclusively) thereby strengthening democracy.

ANNEX D – List of main documents attached / publicly available

ANNEX E - See attached IACT business case for TOC

ANNEX F - See attached draft IACT logframe

ANNEX G - See attached FAST business case

ANNEX H - See attached MODAC business case

Other publicly available background information on I-ACT / MODAC / FAST can be viewed via Development Tracker using the following programme codes:

- I-ACT – 205181
- MODAC – 300291
- FAST - 300948