

UNDP Project ‘Support to the Establishment of a National Integrity System in Tunisia (NIS)’: Mid-term Evaluation

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Table of Contents

1. Introduction & scope.....	4
2. Overall observations.....	5
3. Relevance	6
3.1 Response in the national context.....	6
3.2 Response in relation to partner needs.....	8
3.3 Relevance for marginalized populations and for addressing gender inequalities	8
3.4 Recommendations.....	8
4. Effectiveness.....	9
4.1 Overall observations in relation to UNDAF and UNDP CPAP outcomes	9
4.2 Anti-corruption support	10
4.3 Contribution to broader good governance	11
4.4 Recommendations.....	12
5. Efficiency	13
5.1 Programme efficiency	14
5.2 Management efficiency.....	14
5.3 Recommendations.....	15
6. Sustainability	16
6.1 Findings.....	16
6.2 Recommendations.....	16
7. Gender integration	17
7.2 Findings.....	17
7.2 Recommendations.....	18
8. Conclusions.....	18
Annex I: People consulted & schedule	21
Annex II: Debriefing presentation	27
Annex III: Recommendations for a revised results framework.....	33
1. Clarify Theory of Change (ToC) with stakeholder inputs.....	33
2. Spell out learning objectives	36
3. Niche mapping: NIS added value and unique contribution	36
4. Clearly spell out internal UNDP mechanisms for coordination and support	39
5. Tentative framing of new results areas.....	39
Annex IV: Note on Gender Equality integration.....	42

1. Introduction & scope

The three-year UNDP Project ‘Support to the Establishment of a National Integrity System’ was conceptualized and developed in response to the increasing demand on anti-corruption assistance in Tunisia following the 2011 revolution. The project, which has an overall budget of **USD 3,717 million** between 2012-end 2016, provides targeted technical support with the following anticipated results:

- Result 1: National anti-corruption strategy and an action plan developed;
- Result 2: Tunisian Anti-Corruption Agency (TACA) operationalized;
- Result 3: Diagnostic reports on the existing anti-corruption legal frames developed;
- Result 4: Anti-corruption, transparency and accountability knowledge institutionalized;
- Result 5: Public awareness on anti-corruption and transparency and accountability increased.

The in-country work for the Mid-term Evaluation was undertaken in March 2016. It built on a previous evaluation mission undertaken in the context of an ongoing global Thematic Evaluation for the UNDP Independent Evaluation Office of ‘UNDP’s contribution to anti-corruption and governance integrity in a development context’ for which Tunisia was selected as one of several case countries globally. Some of the interviewing undertaken for this evaluation could therefore inform and be used also towards the Mid-Term Evaluation. The March mission also included a field work to interact with civil society partners implementing a first assessment for the establishment of a Local Integrity System in the municipality of Zarzis. Annex I contains the schedules of both missions undertaken that have informed this evaluation.

As outlined in the TORs, the purpose of the mid-term evaluation (MTE) is to assess and determine the performance of the project over the past 2.5 years of implementation in relation to the four results areas, in order to: a) ascertain the progress towards achieving agreed project outputs and targets, b) determine appropriate measures for refocusing project strategies where necessary and c) highlight areas of strength and opportunities for achieving the desired project results and d) capture lessons learnt.

Furthermore, the mid-term evaluation has been specified to be primarily forward-looking, in order to inform any future phase of the project after its end in 2016. Therefore, the MTE was asked to look specifically at the overarching logic of the project, including the project design and assumptions made at the beginning of the project as well as its evolution. In addition to specific project results, the MTE was also asked to reflect on partnerships established, capacities built and whether the programme implementation strategy has been optimal in view to recommend areas for improvement.

The report is structured around the key questions outlined in the TORs under the headings of relevance, effectiveness, efficiency (including UNDP coordination and management efficiency) and sustainability. Key questions outlined in the TORs are summarized for each sub-section of the report.

Additionally, as also specified in the TORs, a special section on gender inclusion is included, with recommendations on how to strengthen this aspect in a future phase.

2. Overall observations

In reviewing the literature as well as during interviews with project staff and stakeholders, the NIS project seems to have gone through some distinct phases during its early years from formulation in the post-revolution context to date:

A first phase (2012-2013) was characterized by the urgent need and domestic demand to quickly intervene on the anti-corruption agenda in the post-revolution context. UNDP had the advantage of already having established relations with key ministries and was seen as a trusted counter-part given its neutrality and convening power in the national context. The urgency also came from the need and willingness to quickly secure the political space for moving the anti-corruption agenda forward, and to fill the capacity gap in-country on this issue. However, with technical expertise being largely external to the Tunisian context, some of the concepts used to conceptualize efforts to quickly support the *establishment of a National Integrity System* also created some initial confusion. Even the concept of what such a system would entail, and who would control it, was not well explained or well internalized at the outset. This may in turn may have caused for unnecessary deadlocks further along into the implementation.

A second phase (2013-2014) broadly contained a number of activities that were carried out in a rather ad hoc manner. In a highly politicized context, the lack of clear leadership as well as a lack of a clear role division, both between national counterparts and between UNDP and its national partners led to frustrations at both sides, and a high turn-over rate of project staff followed. Some of the outputs, such as the elaboration and adoption of a National Anti-Corruption Strategy also stalled in a politically volatile context. This led to the project facing a number of difficulties in project management with a lack of sufficient technical expertise made available at a critical moment. Throughout this period of stagnation, a number of activities did still take place, however, even if the approach were rather ‘input-output’ oriented. During this period, several more donors were also moving into this field, and a lack of donor coordination added to the overall lack of role division and leadership needed to push the anti-corruption agenda forward at a more strategic level. In this ‘input-output’ approach to project management, activities were still continuing and ongoing around the self-evaluation of UNCAC, the project website Anticor.tn and in the initiation of the legal reform projects. Continuity was left in the hands of one UNV staff members until a new UNDP project team was put in place mid-2014 onwards. Technical expertise depended largely on the regional UNDP project and internationally sourced experts at the time.

A third phase (2015-2016) saw a reinforcement of the UNDP project technical expertise in-country with a new project management team being put in place. There was also increased coordination with other donors and international agencies active in the area of anti-corruption, which was initiated by UNDP and the NIS project. Technical expertise in-country combined with a more politically astute project team also managed to unblock previously stalled processes by broadening agendas and interventions e.g. by broadening the scope of the national anti-corruption strategy to also look at the broader issue of good governance and governance integrity. The new leadership of the National Ant-Corruption Authority since Jan. 2016, has also made it possible to re-orient support to become more effective and geared to advancing towards identified result areas. Despite several key results areas still being left to achieve very late in the project cycle, it is possible to note that from having gone through a phase of both internal and external difficulties, the environment is now shifting to be much more favorable towards implementing a

more holistic approach towards system strengthening both at the national and local level (in conjunction with the planned decentralization). Another important recent shift has been the renewed political will to address issues of good governance with the establishment of a Ministry for Good Governance, Anti-Corruption and Public Administration Reform in 2016.

This mid-term evaluation occurs very late in the implementation process, as the project is getting close to the end of its first phase. While summative results are therefore difficult to assess at this stage, it is also important to keep these three phases in mind, since some activities – even though initiated at the very beginning of the programme – literally came to a stand-still until very recently. Other components, such as an increasing focus on the establishment of Local Integrity Systems, has only recently been initiated and go beyond the initial results framework in its scope, given the opportunity to link it to preparations for Tunisia’s decentralization.

It is, however, possible to conclude that *particularly* in such a volatile and rapidly changing context, it is important for a project like the NIS to be very agile and to be able to quickly adapt to new openings and conditions, as well as to the evolving needs of national counterparts. The project does not seem to have had this in-built agility and flexible management built into it in the past. A key lesson for the future is to more firmly strengthen the leadership and integration of the NIS project into the overall UNDP country portfolio of support, and to ensure that the necessary mechanisms are put in place internally to be able to better serve partners’ evolving needs while maintaining UNDP’s multiple entry-points of support to advance the overall anti-corruption and governance integrity agenda.

The following sections will go into more details on this, following broadly the evaluation questions set out in the TORs.

3. Relevance

Summary of Key Findings & Recommendations

RELEVANCE: *How did the project respond to priorities, context and partner needs in the post-revolution context of Tunisia? Was support aligned with UNDP priorities and expertise? Did it correspond to the needs of all segments of the population? How did the project adapt according to shifting context and priorities along the way?*

3.1 Response in the national context

- UNDP responded – as one of the first actors with presence on the ground and with established relations with key ministries – to a **pressing political need** to address corruption in the immediate aftermath of the revolution. This was significant for **legitimizing the agenda** in a turbulent and politicized context, which in turned allowed to move it forward.
- The response was considered **timely** and necessary, and **aligned** with government priorities to unblock restrictions put on UNCAC implementation, including the establishment of an interim National Anti-Corruption Authority and strengthening the legal framework for anti-corruption.

- UNDP was also first to initiate operational as well as technical support to the interim **National Anti-Corruption Authority** and has worked closely with it ever since. While this was significant at the outset, the unclear legal framework which could not guarantee the authority's independence, as well as the inability of the institution to concretely address the issue of corruption, may have partially undermined such initial efforts to operationalize the Authority. Other challenges were linked to lack of leadership and resources.
- The close links between UNDP and the National Anti-Corruption Authority was relevant at the outset. However, it has also meant that many interviewed stakeholders (particularly from the civil society) **associate the National Anti-Corruption Authority with UNDP**.
- Likewise, the UNDP NIS project is associated by stakeholders largely with the Anti-Corruption Authority, rather than on a broader set of governance actors or issues. In the long run this **may undermine the Authority's domestic legitimacy**.
- Until 2015, with preparations in 2014, the UNDP support has had a strong anti-corruption focus, tied to the UNCAC gap analysis with a quite **technical approach**. Since capacities at national and local levels were limited in relation to UNCAC implementation, this was relevant. However, it meant that there was less focus on transparency and social accountability, particularly at the sub-national level, or as a cross-cutting theme to be integrated across the UNDP governance portfolio.
- Civil society had, for the first time, a chance to engage in structural dialogue around the national anti-corruption agenda through its UNDP-facilitated involvement in the regional and national consultations around the UNCAC self-assessment. Systematically involving civil society in all activities undertaken by the programme has led to **the emergence of a technically skilled and professional group of civil society organizations** pursuing this agenda at the national level. However, the circle has not yet been widened to be more inclusive of the diversity of Tunisian civil society, and has not yet really included groups outside of Tunis (except for a couple in the pilot municipalities for the LIS).
- The initial approach of supporting a national alliance was **perceived as 'imposed'** by the project did not work (ATIT), and civil society actors resist being forced into coalitions unless they are with 'natural allies'.
- Initially, activities did **not address** the sense of **mistrust and a broken social contract** between the State and the citizens, also associated with a rise in **petty corruption**.
- Several partners felt that – in retrospect – project priorities had been **hastily agreed upon**, following largely UNDP expertise, **without a proper context analysis** of the different forms and **drivers** of corruption and the anti-corruption agenda in the politically volatile Tunisian context.
- **Trust and legitimacy constraints** within the governmental departments and in relation to the National Anti-Corruption Authority due to unclear mandates made the intervention more contested and less relevant to country needs.

3.2 Response in relation to partner needs

- The UNDP approach to provide technical capacity building was relevant in the Tunisian context where national capacities to implement UNCAC and address corruption more broadly were nearly inexistent as it had not previously been a national priority. However, UNDP did **not have sufficient technical expertise in-country** (CTA only as of mid-2014) and efforts to mobilize international ad hoc expertise often experienced delays, particularly in relation to the development of a National Anti-Corruption Strategy.
- **Poor donor coordination** around anti-corruption support in the post-revolution phase, and lack of time to do proper project design meant that UNDP's strengths, added value and **complementarity to other actors** was never properly mapped out. Since March 2015, quarterly development partner's coordination meetings were introduced to address this.
- UNDP's **internal coordination** between County Office and regional-level expertise (e.g. from the UNDP Regional Anti-Corruption Project) was not clear and/or clearly explained to partners.
- The **terminology** used by UNDP around the establishment of a '*National Integrity System*' initially caused some **confusion** among national partners as such a system was not clearly defined. Supporting the establishment of such a 'system', when internally mandates are not clear may have required a longer multi-stakeholder process around **how such a system should be defined**, including how it is **held to account**.

3.3 Relevance for marginalized populations and for addressing gender inequalities

- The project documentation and results framework makes **no specific mention** of marginalized populations and gender dimensions of corruption.
- Previous studies on youth and social cohesion (under the UNDP Civil Society Support Project) has looked at **youth perceptions** on corruption as a key concern, which was also reflected in the uprisings that led to the revolution. **Yet these concerns were not addressed in the more targeted UNDP anti-corruption support under the NIS project.**
- Only very **late**, in 2015/early 2016 has the project included a focus on the **sub-national level** in more marginalized areas outside of Tunis. This leaves little time before the end of the project in 2016 to complete the diagnostics work for setting up a Local Integrity System in two pilot municipalities and extend consultations to individual **citizens** (beyond the contracted CSOs).
- **Diagnostics work** for the LIS does not specifically look at issues of **marginalization** or **gender** in its analysis making the approach less relevant for systematically addressing such concerns in the programming.

3.4 Recommendations

- For a future phase, it would be good for the project to be more clear **how it supports** (or not) different aspects of anti-corruption, transparency and social accountability and/or how it is

complementary to other key initiatives in these area (e.g. e-governance initiatives, support for decentralization and fiscal transparency at the municipal levels etc.). In other words, it would be good to see more clearly **where the boundaries** of the 'National Integrity System' go, and how the full 'eco-system' of support interacts with national priorities.

- Such analysis should include a deeper understanding of how different actors and institutions act as drivers at different levels to identify multiple **entry-points and synergy effects**.
- A contextual analysis also needs to be better tailored to the **unique Tunisian context**, referring to existing processes and institutions, with a clear role division between them.
- A better understanding of corruption in relation to **social cohesion** and **youth perspectives** will be important to translate into practical programming, going forth, drawing on previous UNDP studies in this area.
- Likewise, there needs to be a more in-depth **gender analysis** conducted to identify gender aspects of corruption. Such analysis should go beyond just 'input indicators' around equal participation to look at inequalities as a **driver** for corruption (e.g. lack for opportunities for women to hold public authorities to account in local participatory planning processes, or a lack of respect and empowerment for women leading to 'sextortion', or disproportionately by-passing women in access to jobs or University etc.). The other side would be to study gender inequality as a **symptom** of corruption, and what the means particularly in relation to social accountability in public service provision.

4. Effectiveness

Summary of Key Findings & Recommendations

EFFECTIVENESS: *To what extent has the project and/or is it likely to attain its objectives? Are these objectives reached within the agreed timeframe, and if not, why? Is it possible to link results to broader patterns of systemic impact? What factors – including knowledge/training efforts – have contributed to results achievement to date?*

4.1 Overall observations in relation to UNDAF and UNDP CPAP outcomes

- A series of **important**, though sometimes '**disjointed**', outputs have been produced under each of the results areas laid out in the CPAP and project results framework.
- Importantly, **despite considerable implementation and internal management challenges** from the side of UNDP along the way, the project has '**caught up**' with **previously accumulated delays** within the past year. It is therefore the overall assessment of the Evaluation that the NIS project currently is likely to achieve main objectives against the set results.
- In some areas, like in results area 3 where a sub-national dimension has been added through the Local Integrity System (LIS) support, the project has even **surpassed initial expectations** on

results, even if it is late to initiate new processes so close to the formal end of this phase of the project. Yet, these additions seem relevant in the given context.

- As a relatively small project with very ambitious objectives, it is however unclear how the NIS project contributes to, or complements, other initiatives in relation to the relevant **UNDAF** objective which deals primarily with **decentralization** and democratic governance based on **citizen's participation and engagement**.
- Although there is one component that is directly geared to citizens via public information, it still operates largely in the area of information dissemination. Since its inception, civil society organizations are seen to be the representatives of citizens, with some efforts to consult key associations at the municipal level pilots. Yet, to date there is weak evidence of the project **directly implicating citizens**, or the mechanisms used by CSOs use to do so. In the last year, there are efforts to apply a more citizen-centric social accountability approach, which is still to be demonstrated.
- Possibly as a consequence of the way the result area objectives are being formulated, results fulfilment from the NIS are (or appear as) **patchy**. Several processes have been blocked along the way (e.g. under Results area 1 around a National Strategy, and partly Results area 2), both by national partners and internally due to UNDP's own management challenges (see 'efficiency' below) which have led to **implementation delays**.

4.2 Anti-corruption support

- From an effectiveness perspective, extensive support to the Anti-Corruption Authority **without having a solid legal framework in place** could retrospectively be questioned. Even though the NIS project provided substantial support to its operationalization, there was close to a standstill in pursuing cases under the previous President until a more solid and permanent legal framework had been adopted and absolute independence could be guaranteed. UNDP support effectively produced a number of outputs, such as a strategic plan and communications plan of the Authority. Yet it is unclear how this directly or indirectly contributed to reducing corruption in the time frame leading up to the evaluation.
- The NIS project has built up a vibrant (informal) civil society network around the programme starting with regional consultations on UNCAC and its implementation. There were however initial efforts and investments made to establish a national alliance of CSOs active on anti-corruption issues which failed and is no longer functional. A more **strategic approach** to civil society engagement, which has been explored in the past, is to be using existing UNDP mechanisms for grant-making and capacity-building to facilitate direct citizen engagement in social accountability efforts (partly foreseen under the LIS work).
- Efforts to institutionalize technical knowledge on anti-corruption among partners (described under Results area 4) are currently **disconnected from specific learning and outcome objectives**. It is therefore impossible to assess whether such knowledge initiatives have led to concrete awareness raising or changes in behavior. In practice, it was treated as a cross-cutting issue, however this is not clear from the reporting format. If indeed cross-cutting, it should be more clearly defined with a separate 'learning objective' or outcome under each of

the other result areas. Any efforts to institutionalize knowledge should be seen as a component of broader objectives (e.g. ‘ability to monitor UNCAC recommendations’ or ‘ability to engage constructively with civil society around sector-specific social accountability objectives’).

- With changes in leadership among government counterparts, there is now **new momentum** to move forward towards achieving key results, particularly the **operationalization of the Anti-Corruption Authority** and a **National Strategy for Anti-Corruption and Good Governance**.

4.3 Contribution to broader good governance

- At a national level, there has been a strong focus on supporting technically and operationally, the National Anti-Corruption Authority, with a **disproportionally less pronounced or clearly defined** support to the government counterpart and the sector good governance focal points. In a future phase, it would be good to better define how a National Integrity System is meant to operate on all levels, and to ensure that there is sufficient support to operationalize it together with other bilateral partners. The finalization of a National Strategy for Anti-Corruption and Good Governance, once finalized, may be a way of **better aligning support**.
- A key lesson has been that the timing for drawing up a National Strategy for Anti-Corruption may not have been optimal earlier, without clear mandates for the key institutions involved. Moreover, ‘anti-corruption’ clearly has a narrower interpretation than ‘good governance’ - even if the two are intricately linked. The NIS project **successfully unblocked** the stalled process by widening scope and focus of the plan, involving a broader set of actors – including Parliament – and relaunching it. It will be important to coordinate this plan with the approved National Action Plan for the OGP so that parallel funding streams are not created.
- Support to the evaluation of Local Integrity Systems in two pilot municipalities could go further in **linking multi-stakeholder** dialogues around findings and action plans with **existing local structures** for engagement and funding sources in order to connect analysis with practical action.
- Analytical tools used need to be **owned, understood and adapted** by local actors and existing local structures for **citizen engagement in local level planning or civic oversight**. In the ongoing LIS diagnostic work, current CSO consortia structures are meant to mentor local ‘anchor’ associations, but this could lead to dependencies on external leadership and support and lack of contextualized analysis. There is a need to critically assess how and to what extent CSO consortia consisting of both local, national and international actors **added value** to **ongoing local processes**.
- Currently there is no gender disaggregation of data used in the local level integrity systems diagnostic tools. There is a need to **gender disaggregate data**, ensuring that particularly women from less advantaged (and less public) environments are also included.
- Sector studies planned for governance integrity in education and health under the NIS project should **include linkages to other key Ministries and sectors** where UNDP would have an added value. This could include the Ministry of Justice (building on efforts within Transitional

Justice), Security Sector Reform and Decentralization under the Ministry of the Interior. Any sector studies should also contain gender analysis.

- In line with UNDP's increased focus on local integrity systems and support for **citizen engagement** in social accountability initiatives for the **municipal investment plans**, UNDP's institutional relations with the Court of Auditors could also add value to link its sub-national structures and outreach to citizen feedback mechanisms.

4.4 Recommendations

- In the next phase of the NIS, there is a need to **entirely restructure the programme**, both with a re-formulation of the different key results areas, and with new indicators. Such results should be less outputs oriented, and look more towards the strengthening of key national actors to drive the process forward against more broadly defined outcomes.
- In this context, it could be good for the NIS project to **map out its added value** more specifically to different national actors and in relation to other international development agencies and technical support for more effective delivery of support.
- As there are more actors engaged in specialized anti-corruption support now as opposed to in 2011, UNDP could add value by broadening its focus and scope to engage more in **sector accountability**.
- To increase its effectiveness, the NIS project should **act as an overlay** (or complement) to already ongoing processes and structures, to connect the dots between various efforts to promote the integrity agenda. This could mean working with **a broader set of national partners** as well as supporting other projects to mainstream and measure efforts to support systems of integrity in their ongoing operations.
- With a comprehensive **OGP National Action Plan** in place, along with a functioning engagement structure where civil society also is present as members, efforts to better **streamline** support and align with the UNDP-supported process around a **National Strategy for Anti-Corruption and Good Governance** would be needed.
- Engagement in setting up local integrity systems (LIS) presents the opportunity to more systematically analyze and include at least one **gender responsive** and one **gender transformative** recommendation for participatory municipal investments
- In relation to Results area 2, it would also be recommended to determine the future of the platform **Anticor.tn**, currently run by the project staff, and to find a long-term institutional 'home' for the platform if it is assessed to still add value to stakeholders. Different options should be explored. Efforts in this regard were initiated in 2015 with a joint committee across stakeholders to jointly run the website. Main 'home' and ownership should be clearly spelled out and explored further.

- **Donor coordination** should also be moved out of the Result area dealing with the National Anti-Corruption Authority and should include support to good governance and integrity from a broader perspective.
- A new phase should seek to secure the perception of **domestic leadership and independence** of the Anti-Corruption Authority now that the basic operating mechanisms are in place. Messaging needs to reflect this in public communications. It would also be highly advisable for the NIS project to move out of the National Anti-Corruption Authority's office to a separate location while still keeping the staff member in charge of Anti-Corruption support within the Authority for day-to-day support (see also under 'sustainability' below).
- It is recommended that Results area 3 be **reorganized** to more clearly group activities (e.g. the establishment of LIS and sector work) under separate, clearly defined objectives.
- While the current phase of the NIS project has focused largely on producing diagnostic work, some – like the strategy for engaging civil society – is not well embedded in the national and sub-national context. Others, like the diagnostics of the legal framework had clear Action Plans and follow-up activities attached to them. There is a strong desire by partners to move more into an action-oriented phase, with concrete lessons more continuously recorded.
- Likewise, **monitoring and evaluation against more clearly defined objectives** would be needed in the current Results area 4 (institutionalization of knowledge on anti-corruption), which should be mainstreamed across other areas of support rather than be seen as a stand-alone component.
- Efforts to **contextualize civil society support further** is furthermore recommended, particularly responding to special interest groups such as **women, youth and populations living in marginalized areas**. The current civil society engagement strategy also contains weaknesses as to selection criteria in its targeting and outreach efforts, with vague outcome formulations such as "increased citizen awareness" which will be impossible to monitor effectively.
- In efforts to establish a 'Citizen's Integrity Observatory', it is recommended that **lessons** from previously efforts to support a civil society alliance against corruption is taken into consideration (which led to project inefficiencies) in order to avoid repeating the same mistakes. It is also unclear who, outside of the NIS project, would 'own' and 'drive' such an observatory. Using and involving already existing structures should, as far as possible, be considered rather than setting up parallel structures.

5. Efficiency

Summary of Key Findings & Recommendations

EFFICIENCY: *To what degree has the NIS project achieved more results for less cost? Is the project maximizing its comparative advantage in relation to other peer international organizations? Have outputs been achieved in a cost-efficient manner? Are the necessary resources allocated to the project to achieve stated outputs? Are management of the project (human and financial resources) efficient in*

terms of delivering outputs and services in a timely manner? Are results monitored and are risks efficiently handled?

5.1 Programme efficiency

- The evidence is indicative of a need to review both the NIS project as well as the broader portfolio of projects from the perspective of increased programme efficiency through: (i) more **flexibility and adaptive programme management** in line with emerging lessons and contextual factors, and (ii) exploring how **synergies** across projects, and in collaboration with other donors/international organisations can help cut costs so that UNDP's unique added value can be enhanced.
- **Inability to more flexibly adapt** approaches to partner needs and the evolving political context may have contributed to inefficiencies in e.g. the development of a National Anti-Corruption strategy in 2013-14, for which the budget was exceeded by 200% by the end of 2015 without having an adopted plan in place. The team, reinforced by politically astute and highly qualified staff has managed to unblock this process, but this adjustment comes late in the project's implementation and the process lacked qualified personnel to steer it successfully in the earlier phases of the project.
- Initiatives such as refurbishing the conference room at the interim Anti-Corruption Authority, which was expected to be a cost-cutting measure in the longer run, has not turned out to be an efficient use of money during the project period due to various **delays** in its completion. Other components, such as carrying out a more detailed study before installing an information system for case handling led to expected substantial **efficiency savings**.

5.2 Management efficiency

Project and country office considerations

- The UNDP response to the **inherently political issue** and evolving process around corruption as a key driver to popular uprising was largely a technical response, based on practices or methodologies developed elsewhere, with insufficient focus on action at the ground level.
- During the early stages of the NIS project, instead of appointing highly skilled **technical staff** and '**politically savvy**' national experts, less qualified staff **focused on a rigidity in implementation according to the programme document, following UNDP procedures**. This negatively affected partner trust and UNDP's potential added value.
- The **appointment of a CTA and a new project team** has been much appreciated by partners and managed to turn the project around to unblock some of the previous processes. This came after a period of high turn-over of project staff and was the third project team since its inception.
- The cross-project **coordination function** and **managerial leadership** from the Country Office – both within and across main axes of support – had been missing in the past, and efforts to strengthen it (since early 2016) was much needed and welcomed.
- All project partners, without exception, talked about **substantive delays** in getting any decisions from UNDP on e.g. the mobilization of experts, work plans, reports. This was attributed to UNDP's

own internal inefficiencies between the project itself and the ‘quality assurance’ function at the UNDP Country Office which sometimes seemed to stall ongoing processes rather than helping them along. This was perceived to be **particularly problematic for a project that needed to be agile, adaptive and creative** to take advantage of emerging opportunities in the shifting political landscape.

Regional considerations

- UNDP’s own **‘architecture’ for regional support** to country offices is not well-designed for optimal coordination since the regional anti-corruption project (Anti-Corruption and Integrity in Arab Countries, ACIAC), is located in Beirut, Lebanon, outside of the UNDP Regional Bureau for Arab States, which has a regional coordination hub in Jordan. This is causing structural difficulties for day-to-day coordination of support since they are both working directly towards country offices.
- The Regional Hub has a coordination and technical support mandate, yet, contrary to the regional ACIAC project, the UNDP Regional Hub works entirely on the demand of Country Offices, and does **not have its own donors, funding sources and objectives to deliver on**. This limits their capacity to support an added value through a regional dimension since all regional initiatives have to be agreed and paid for by country offices. The ACIAC regional project, on the other hand, has its own project objectives to deliver on which may **not always be aligned with country actors’ evolving needs**.
- Because of this structure with several layers of support, there was an overall impression of regional/country support sometimes following **parallel tracks** with **parallel national counterparts** due to lack of clear communication, coordination and a more comprehensive strategy from the UNDP Country Office on how to most efficiently tap into these additional mechanisms for UNDP support for the benefit of the project.

5.3 Recommendations

- A more **flexible project management framework** will be needed in order to avoid future delays and blockages which, in turn, has led to project inefficiencies in the past.
- From a design perspective, this means having a **clearer results framework** to work against, where the agreed roles and expected milestones of national partners are more clearly spelled out and matched to appropriate UNDP support (indicating where and how regional support complements national project efforts).
- It would also mean **critically review** both horizontal (between projects) and vertical (UNDP CO to project) coordination and internal operating procedures, particularly between the project and UNDP Country Office, and **eliminate steps that may not be strictly speaking necessary or cause major delays**.
- To speed up internal processing of project matters and strengthen coordination with other projects, it could be worth considering having a **dedicated staff member** (such as a JPO) attached to the project to assist in overcoming some of the current internal barriers in order to better meet partner expectations and needs in a timely manner.

- Given that the project is due to finish at the end of 2016, a recommendation would be to conduct a scoping study for the next phase, including a **thorough restructuring of the project**, towards the end of this year, instead of conducting another (end-term) evaluation shortly after the mid-term evaluation took place. Such a restructuring would need to map out more clearly the **roles and responsibilities** of different support units at project, UNDP Country Office as well as regional levels, and more clearly spell out synergies with other ongoing UNDP projects to look for efficiency savings (following up on recommendation in this report).

6. Sustainability

Summary of Key Findings & Recommendations for Evaluation Questions

SUSTAINABILITY: *To what extent are the results of the NIS Project likely to be sustainable? What are the key lessons learned? What could be made differently in a future phase?*

6.1 Findings

- Clearly, support to anti-corruption efforts is a long-term undertaking. As such it is difficult to assess the sustainability already after such a **short time period**. This is even more pertinent for the NIS project which had different 'phases' with a close to 100% turn-over of project staff with a complete rupture in 2014 before the arrival of the CTA and a new team was hired.
- Additionally, the **objectives** for the project are **ambitious and dependent on the goodwill of many actors**, of which most are outside of the immediate influence of the project itself. At the same time, when and if adopted, anti-corruption laws, a national strategy, and the very existence of an operational National Anti-Corruption Authority, would be hard to reverse.
- At the time of the evaluation, **several of the key outputs were still to be attained**, however.
- The sustainability of concrete results to date from support to operationalizing the interim National Anti-Corruption Authority is **difficult to assess**, before the new permanent Anti-Corruption Commission is established, and the legal framework has been put in place. Sustainability will also rely on the **new leadership's** success in **'domesticate' the institution and prove its added value**, whereas efforts to date have been seen by stakeholders as largely being led by UNDP.

6.2 Recommendations

- To further enhance the new national leadership of the Anti-Corruption Authority, UNDP may **consider moving** the project out from the Anti-Corruption Authority premises, keeping just 1-2 staff members based there to ensure open communication and ongoing TA support. This is in response to feedback from stakeholders that there are no clear boundaries between what is UNDP and what is Anti-Corruption Authority in the NIS project, particularly since project support is meant to benefit also other actors.
- Increased coordination among donors and government entities tasked with addressing the anti-corruption, transparency and good governance agenda will be needed to **consolidate gains made**

so far and avoid **parallel funding streams that can cause for internal division** rather than coming together around a common national agenda.

- After a process of awareness raising about corruption and the need to resist it a personal level among the general public, **systemic efforts to show that it is intolerable at all levels of governance** will be important to consolidate gains and avoid a backlash effect from the population.

7. Gender integration

Summary of Key Findings & Recommendations for Evaluation Questions

7.2 Findings

- UNDP projects supporting the Constitutional process and National Dialogue (including the civil society capacity building component) as well as the Electoral process **had technical gender expertise available** on the project teams with additional support from HQ, ensuring that gender equality was being mainstreamed. This type of gender technical support has not been made available to the NIS project. A gender equality dimension is absent from current project documents.
- Efforts to mainstream a gender perspective across different UNDP projects have generally focused on **women's participation** and access to consultative processes around e.g. transitional justice or as part of civil society outreach in the NIS project. There are no real efforts to monitor more transformative efforts.
- **No gender analysis** was undertaken at country level or for the different projects, looking at linking gender aspects to the anti-corruption and transparency agenda.
- Previous efforts in other sectors to **involve gender-focused regional think tanks/research organizations** to analyze gender aspects and mainstreaming implications in e.g. UNDP's support to water governance could be replicated to the area of anti-corruption and gender across programming.
- UNDP's work under the NIS uses a methodology for Local Integrity Systems assessments that have been developed by Transparency International. Yet these do **not provide guidance on gender disaggregation and gender analysis of the data**, and possible ways to translate this into addressing gender angles of corruptions in programming.
- 'Citizen **mobilization and participation**' is often referred to in relation to social accountability and citizen oversight mechanisms, especially at sectoral or local levels. Yet the exact mechanisms for such mobilization and participation is rarely spelled out – even though different mobilization techniques may come with different forms of **gender bias**, particularly in highly conservative and traditional rural environments.

- In relation to the transparency agenda, previous UNDP work in the region has looked at **women's ability to benefit** from e-governance. However, in addition to just **access** of information it would need to be linked to women's ability **to also act on** information in the particular context.

7.2 Recommendations

- There are clear opportunities to work on integrating gender aspects, and providing clear orientations in terms of **gender training**, into the Ethical Code for Security Forces. Clearly this would go beyond just the aspect of corruption to also include e.g. gender-sensitive handling of gender-based violence, domestic violence, and rape cases. However, connected to the area of corruption is the concept of 'sextortion', as a recognized phenomenon of corruption.
- A better understanding of corruption in relation to **social cohesion and youth** perspectives will be important to translate into practical programming, going forth, drawing on previous UNDP studies in this area.
- Likewise, there needs to be a more in-depth **gender analysis** conducted to identify gender aspects of corruption. Such analysis should go beyond just 'input indicators' around equal participation to look at inequalities as a **driver** for corruption (e.g. lack for opportunities for women to hold public authorities to account in local participatory planning processes, or a lack of respect and empowerment for women leading to 'sextortion', or disproportionately by-passing women in access to jobs or University etc.). The other side would be to study gender inequality as a **symptom** of corruption, and what the means particularly in relation to social accountability in public service provision.
- See also suggestions in Annex III on a revised results framework, and Annex IV: Note on Gender Equality Integration.

8. Conclusions

It is possible to conclude that despite some challenges in the implementation of this project along the way in a highly politicized climate, the project now seems to be on a promising path towards achieving some of the results it set out to support at the outset.

Looking across the three 'phases' of the NIS project since its inception and beginning in 2012/2013, it is possible to extract *some lessons from implementation which can inform future programming* and to see the progress from a broader perspective, including the changing roles for UNDP from the first years to the present. These include:

- From the NIS project – driven by UNDP – being the '*doer*' and the *strong trademark* at the outset, to now playing more of a role as *facilitator, catalyst and connector* in multi-stakeholder processes (e.g. around the establishment of a National Strategy for Anti-Corruption and Good Governance, or in facilitating dialogues between stakeholders in the diagnostics work for supporting local integrity systems). This trend should be further explored in any follow-up work

so that the *national actors, not the NIS project, are seen to play a leading role in driving the agenda* going forward. This will be critical in terms of ‘domesticating’ the anti-corruption agenda. Taking more of a ‘background support’ role in the future also means drawing more clearly the boundaries between UNDP and its partners, particularly the National Anti-Corruption Authority whose national legitimacy needs to be strengthened going forward.

- From UNDP, via the NIS project, being the *first and main actor* active in this field of support, to UNDP being *one of many donors* (with better coordination among them since 2015), and where UNDP plays more of a coordinating role. The coordinating role of UNDP has been highly appreciated by both donors and national counterparts and is a natural fit with UNDP’s mandate. This could go even further in a future phase, including coordination with the OGP agenda and National Action Plan as indicated above.
- From the NIS project using *few and very targeted entry-points* of support (focusing largely on the National Anti-Corruption Authority), to using multiple entry-points and a more balanced approach, supporting both horizontal accountability mechanisms (Anti-Corruption Authority, Parliamentary oversight) and vertical ones connecting government and citizens in mechanisms of citizen monitoring and co-creation of good governance solutions.
- From the NIS project working almost exclusively at the *national level* to also engaging in supporting *local integrity systems at sub-national level*, with plans to also engage in *sector specific* integrity that have a direct impact on people’s well-being and trust-building process in public services (such as health and education).
- From addressing corruption largely from a *technical perspective*, in relation to UNCAC implementation and the legal framework on the one hand and explaining the phenomenon of corruption to the general public on the other, to one geared more towards *joint problem-solving bringing State and Non-state actors together* in local integrity systems and for sector-specific engagement.
- From providing *ad hoc support* to specific law projects or towards specific previously agreed outputs towards a more *linked ‘system’ support*, linking also more strategically with other ongoing UNDP projects, such as the collaboration with the parliamentary support project, the transitional justice support project or the security sector reform project currently underway. Continuing this trend under a future phase will ensure that the anti-corruption focus is mainstreamed across the UNDP country portfolio rather than being seen as its own ‘silo’ intervention. Although this has happened on an ad hoc and informal basis in the past, it should be specifically included in the design of any future phase of the NIS results framework to be more visible and traceable across different country support components.
- From relying mostly on *external (regional, international) expertise* to complement national project staff, to having both *technical competencies and a more politically astute and qualified project implementation team in place nationally*, which can drive processes and draw on international expertise as needed while providing day-to-day advice and coaching to national

partners. Having an international CTA in place nationally was critically important for unblocking some of the stalled processes and for ‘elevating’ some of the debates to a more technical level as and when needed in the Tunisian context, and for providing first-hand guidance in a politicized process. This is in contrast to the previous year, where a more junior local staff member (UNV) was left managing the project, complemented by regional and international experts, which did not provide for the necessary continuity and leadership.

The abovementioned trends show that the project has turned around to be on the right direction, even though it comes quite late in the implementation. It is now suffering from a results framework that does not clearly map out how it should work in a more balanced way across national partners, and in a more integrated fashion with other UNDP leverage points to mainstream anti-corruption into the overall governance and country portfolio. Although some indications are included in this report (See Annex III), a full re-design would be necessary for any future phase, where sustainability and national ownership should be central themes in order to move the agenda from a ‘public sensitization’ and a first-level response, to an approach that is more embedded across the governance portfolio and focused on implementation of new laws and the National Good Governance and Anti-Corruption Strategy.

Annex I: People consulted & schedule

1. **Mission undertaken as part of information gathering for the UNDP Independent Evaluation Office, undertaken in January 2016:**

AGENDA FINAL

MISSION : Evaluation globale, Appui du PNUD : Intégrité/ Lutte contre la corruption/ Cas d'étude Tunisie

Du 10 au 15 janvier, Tunis, Tunisie

Contacts : Mme Susanne Kuehn (Conseillère Technique Principale), Mme Oumama Ennaifer (chargée de programme Gouvernance), M. Elyes Farhat (Expert National de Lutte Contre la Corruption-projet SNI), Mme Hakima Ghorri (Partenariat avec la Société Civile-Projet SNI)

DIMANCHE, 10 janvier 2016 Arrivée Tunis Accueil aéroport& transfert à l'hôtel (Mr Amine Soltan- 58450266) Installation hôtel & documentation				
Lundi 11 janvier				
Heure	Meetings/ personnes à rencontrer	Fonction-Institution	Thème-Sujet de discussion	Lieu-Téléphone
08h30-09h30	Mme. Susanne Kuehn	Conseillère Technique Principale Anti-corruption	Briefing /première réunion	Projet SNI, siège de l'INLUCC, 71 Avenue Taieb Mhiri-1002Belvédère Tunis TEL : 58 450 055
09H30-10H30	M. Samir Annabi	Président de l'Instance Nationale de Lutte Contre la Corruption (INLUCC)	Discussions avec le partenaire national du projet SNI	Siège de l'INLUCC 71 Avenue Taieb Mhiri-1002Belvédère Tunis TEL : 98323276
11H00-12H00	M. Mounir Tabet M. El Kebir Alaoui	Représentant Résident / Représentant Résident Adjoint	Briefing mission	Siège du bureau PNUD-41 Bis Impasse Louis Braille
13H00-14H00 : Déjeuner				
14H00-17H00 (reunions consecutives)	M Anis Ben Smail Mme Hakima Ghorri Mme Asma Guitouni	Expert d'Appui à l'INLUCC Chargée de partenariat avec la Société Civile Chargée de communication	Briefing avec l'actuelle équipe du projet SNI	Siège de l'INLUCC 71 Avenue Taieb Mhiri-1002, Belvédère Tunis

	M. Elyes Farhat et Mme Mouna Boussleh	Chargés des opérations administratives et financières		
Mardi 12 janvier				
09H00- 10H00	M. Mohamed El Mounir	CTP PNUD : Projet « Appui au dialogue et à la Société Civile	Discussion autour de la contribution PNUD : intégrité et lutte contre la corruption	Lac –Siège du projet TEL : 58 450 036
10H30- 11H30	M. Jean Raphael Giuliani	CTP PNUD : Projet ARP (Assemblée des Représentants du Peuple)		Lac-Siège Projet TEL : 58 450 075
12H30- 13h30	M. Abderrahmane Ladgham	Ancien Ministre de la Gouvernance et de la Lutte Contre la Corruption	Partenaires nationaux du PNUD	Hôtel Novotel TEL : 98 705 245
13H30-14H30 : Déjeuner				
15H30- 16H 30	M. Tarek Bahri M. Mehrez Hafsi Mme Khaoula Selmi M. Khaled Laadhari	DG des réformes- services Gouvernance Services gouvernance Point Focal de l'UNCAC en Tunisie	Partenaires nationaux du PNUD	La Kasbah TEL : 98 356 042
17H00- 18H00	M. Abdellatif Kharrat	Premier Président de la Cour des Comptes		Cour des Comptes 25 Rue de la liberté TEL : 98 326 882
Mercredi 13 janvier				
8H30- 9H30	M. Khaled Sellami	Point de contact OGP Tunisie Directeur Général de Unité de l'Administration électronique Présidence du Gouvernement, Tunisie	Partenaires nationaux PNUD	La Kasbah 3 ^{ème} étage TEL : 71 563 021
10H00- 11H00	M. Mongi Rahoui Mme Jemila Ksikssi	Parlementaires et membres de la commission de LCC -Parlementaire- Membre des parlementaires Arabes	Partenaires nationaux	INLUCC

		de Lutte Contre la Corruption		
11H00-12H00	M. Thomas Fiegle	GIZ	PTF internationaux	INLUCC
Déjeuner 12H-13H00				
13H30-14H30	Mme.Oumama Ennaifer	Chargée de programme Gouvernance-PNUD	Discussion autour des projets PNUD- Gouvernance-Lutte contre la corruption	Siège PNUD-41 impasse Louis Braille
15H00-16H00	M. Thierry Rostan/ Zorana Markovic	Chef du Bureau Tunis & Conseillère Régionale MENA (UNODC)	Echanges avec les partenaires internationaux autour de la coordination des initiatives	Lac Tunis
Jeudi 14 janvier				
10H30-11H00	M. Abderrahmane El Yessa	Ancien Team Leader Gouvernance PNUD Tunisia	Discussion autour de la coordination des projets- Gouvernance-Tunisie Echanges avec les partenaires internationaux	Par skype
11H30-12H00	M. Ali Sedki	Transparency International- Maroc		Par skype
13H00-14H00 : Déjeuner				
14H30h-16H00	M. Lorand Revault M. Abdelhamid Jarmouni Mme Sana Ghenima Mme Khaoula Ben Mansour Mme Salwa Trabelsi Mme Faiza Rezgui M. Chiheb Bouchnek	TOUENSA, ASSF, Open GOV, Femmes et leadership, ATLUC, Transparence et Démocratie, ISF, RTE, e-gov	Rencontre avec la société civile (ONGs/ partenaires)	Siège de l'INLUCC
Vendredi 15 janvier				
08H30-09H30	M. Filippo Di Carpegna	CTP-projet PNUD- Justice Transitionnelle	Contribution du PNUD aux acteurs nationaux	INLUCC
11H00-12H00	M. Mehdi El Batti Mme Shirley Foronda	Banque Mondiale	PTF	INLUCC
12H30-13H30 : Dejeuner				

14H00-15H00	M. Mounir Tabet M. El Kebir Alaoui Mme Susanne Kuehn Mme Oumama Enneifar	Représentant Résident Représentant Résident Adjoint CTP Projet SNI Chargée de programme Gouvernance-PNUD	Réunion de de-briefing avec l'équipe du projet et bureau du PNUD	Bureau du PNUD-41 impasse Louis Braille
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2. Mid-Term Evaluation mission undertaken in Feb-March 2016:

Du 22 Février au 02 Mars 2016, Tunis, Tunisie

Contacts : Mme Susanne Kuehn (Conseillère Technique Principale), M. Elyes Farhat (Expert National de Lutte Contre la Corruption-projet SNI), Mme Hakima Ghorri (Conseillère d'appui-Société Civile-Projet SNI)

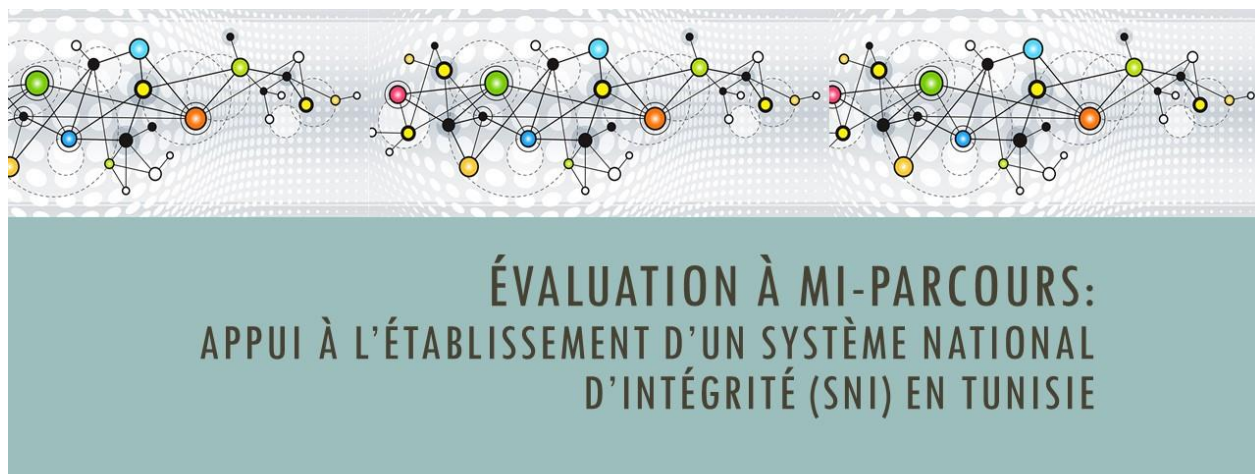
LUNDI, 22 Février 2016 Arrivée Tunis Accueil aéroport & transfert à l'hôtel (Mr Amine Soltan- 58450266) Installation hôtel & documentation				
Mardi 23 Février				
Heure	Meetings/ personnes à rencontrer	Fonction-Institution	Thème-Sujet de discussion	Lieu-Téléphone
9H00-10H00	M. El Kebir Alaoui	Représentant Résident Adjoint	Briefing mission	Siège du bureau PNUD-41 Bis Impasse Louis Braille
10H00-11H00	M. Eduardo Lopez-Mancisidor Mohamed Madhkour	Gouvernance Chargé de programme Etat de Droit	Discussions- Projet SNI	Siège du bureau PNUD-41 Bis Impasse Louis Braille
11H30-12H30	M. Anouar Ben Khelifa	Ancien Secrétaire d'Etat- auprès du chef du gouvernement, chargé de la gouvernance et de la fonction publique	Partenaire national-Projet SNI	Avenue de la liberté (deuxième local de la Présidence du G
12H30-13H30 : Déjeuner				

14H00-17H00 (réunions consécutives)	M. Elyes Farhat M Anis Ben Smail Mme Hakima Ghorri Mme Asma Guitouni Mme Mouna Boussleli Mme Nadia Dahri	Expert lutte Contre la Corruption Expert d'Appui à l'INLUCC Conseillère d'appui de la Société Civile Chargée de communication Chargés des opérations administratives et financières Ancienne équipe du projet SNI	Briefing avec l'actuelle équipe du projet SNI	Siège de l'INLUCC 71 Avenue Taieb Mhiri-1002, Belvédère Tunis
Mercredi 24 Février				
09H00-10H00	M. Houssemeddine Esshak M. Miled Achour	Projet PNUD Réforme du Secteur de Sécurité	Synergies – Projets PNUD	LAC-
10H30-11H30	M. Cahwki Tabib	Président actuel INLUCC	Discussion de l'appui du projet SNI, résultats, recommandations	Siège de l'INLUCC 71 Avenue Taieb Mhiri-1002,
11H30-12H30	Mme Sawssen Gargouri Mme Sana Ghenima	Article 19 Femmes et leadership	OSCs	INLUCC
12H30-13H30 : Déjeuner				
15H00-16H00	M. Tarek Bahri	DG des réformes-services Gouvernance-Présidence du gouvernement Services gouvernance	Partenaire National principal du projet SNI	La Kasbah TEL : 98 356 042
Jeudi 25 Février				
09H00-09H30	M. Ueijin Lee Mme ciel flower	Korea International Cooperation Agency(KOICA)	P TF	Mutuelleville-Siège KOICA
10H30-11H00	Femmes Libres	Association partenaire-Sfax	Echanges avec les partenaires nationaux	Par skype
Déjeuner				
13H00-14H00	M. Mongi Rahoui	Parlementaires et membres de la commission de LCC	Discussions avec les partenaires nationaux du rôle actuel et futur des	INLUCC

14H00-15H00	M. Slim Besbess		élus dans la mise en place des mécanismes de Lutte Contre la corruption	
17H00-18H00	Mme Amira Riahi	Conseil de l'Europe	PTF international	
Vendredi 26-27 Février –Visite de terrain-Zarzis				
Rencontres avec les acteurs locaux/municipalité de Zarzis-Discussion autour du projet Système Local d'intégrité				
Lundi 29 Mars				
14H30-16H30	M. El Kebir Alaoui Mme Susanne Kuehn Equipe du projet SNI	Représentant Résident Représentant Résident Adjoint CTP Projet SNI	Réunion de de-briefing	Bureau du PNUD-41 impasse Louis Braille

Annex II: Debriefing presentation

A longer debriefing was held with the project team at the end of the Mission, March 2016. The shorter version (included below) was presented at the NIS Project Steering Committee on 12 April, 2016.



Conclusions principales et recommandations
Charlotte Ørnemark, charlotteornemark@gmail.com

OBSERVATIONS GLOBALES

- Trois phases distinctes au cours de ses trois années d'existence.
- Changement dans le contexte Tunsien après la revolution, mais aussi des changements dans l'équipe et l'approche du PNUD
 - 2012/2013: Dans un contexte politisé, l'appui a répondu aux grands besoins nationaux dans la domaine de la lutte contre la corruption, réponse technique pas toujours bien adapté au contexte national
 - 2013/2014: Stagnation, approche ad hoc dans le projet & l'instabilité politique
 - 2014/2015-16: Rattrapage sur l'appui des systèmes nationaux et réalisation des résultats.

ÉVOLUTION DES BESOINS

- À partir d'une réponse très technique au niveau national (auto-évaluation pour le CNUCC, diagnostique du cadre législatif), vers
- Une réponse décentralisée dans le contexte local, avec des liens importants avec des autres initiatives
- Une approche sectorielle
- À partir d'une situation où c'était important pour le PNUD de légitimer l'ordre du jour de la lutte contre la corruption -- à une situation où le leadership national/ la visibilité des actions concrètes est important pour la crédibilité.

"L'Instance et l'appui PNUD dans cette domaine – c'est la même chose. Le mandat de l'Instance n'est pas clair. C'est un projet du PNUD..."

L'évolution d'approche dès le début (2012/13)...

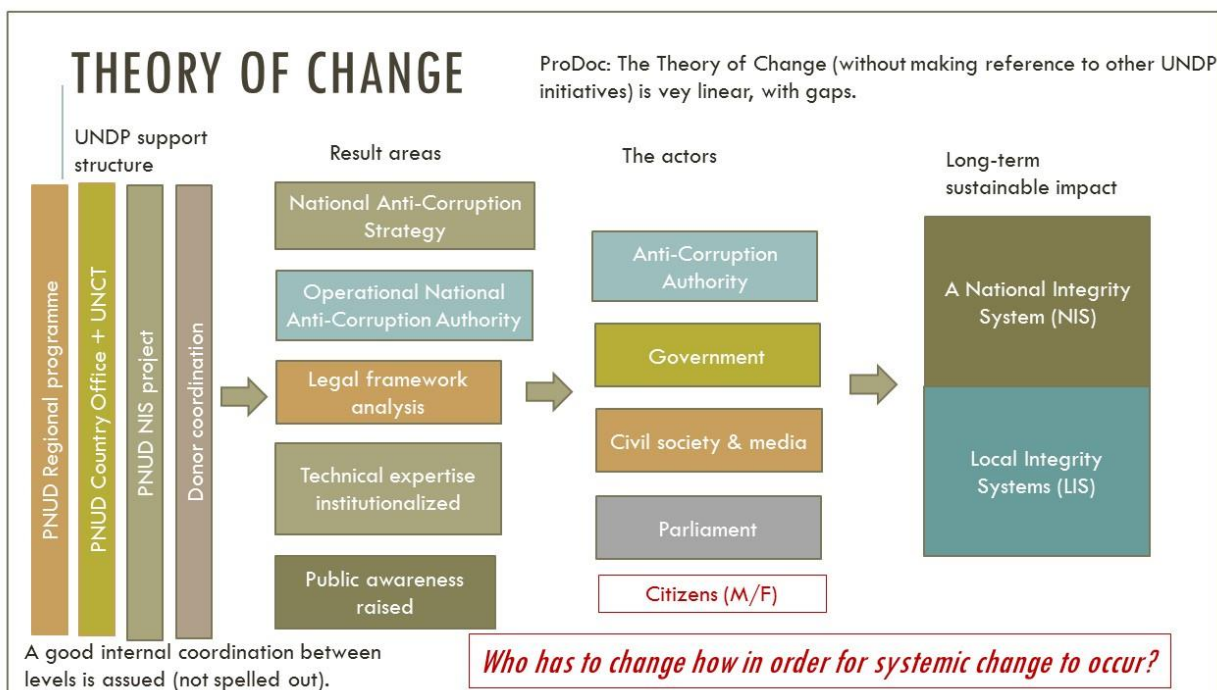


... réponse rapide aux besoins nationaux...

- Important d'avoir été là depuis le début
- Sécuriser l'espace politique
- Agir rapidement
- Légitimité
- Une demande réel
- **Un manque de capacités nationales**
- **Des concepts 'importés' comme Système Nationale d'Intégrité**
- **Au début: Ne pas bien expliqué**
 - Comment cela fonctionne-t-il?
 - Qui contrôle ce système?
 - Conflits qui aurait pu être évité

CONCLUSION (PERTINANCE):

- Le projet SNI est maintenant sur le 'bonne chemin' pour réaliser les résultats prévus.
- MAIS les résultats prévus dans la conceptualisation du projet ne sont pas nécessairement les plus importants maintenant (évolution du contexte').
- Des défis internes dans la gestion du projet - entre le projet NIS et le bureau PNUD de pays - sont toujours là.
- **Profondément restructurer le projet et son cadre de résultats.**
- La répartition des rôles entre les différents partenaires nationaux appuyé par le projet n'est pas clair.
 - Pour ajouter de la valeur, le PNUD doit travailler à travers de multiples points d'entrée à différents niveaux.
 - Élargir et équilibrer les partenariats.



RÔLE ET GESTION - PNUD



Observations générales

- Coordination entre les différents aspects d'appui du PNUD et les autres bailleurs n'était pas toujours claire
- Pas toujours bien adapté aux besoins nationaux
- Nouvel équipe SNI (depuis 2015) **motivé, qualifié et respecté** – mais défis interne de coordination efficace du project
- Tout les partenaires et 'key informants' sans exception (SC, Gouv, consultants..) ont remarqué qu'il y a des **inefficacités dans l'administration et procedures**

bureaucratiques du PNUD

- La coordination interne est **lent** (e.g. rapports, plans du travail, etc.)
- Manque de **coordination horizontelle** entre les différents projets (volet gouvernance et autres) – mais la bonne volonté est là

Recommandations:

- Plus de flexibilité et la capacité à adapter le project au contexte
- Eliminer des procedures interne qui ne soit pas strictement nécessaire dans la gestion du project
- 'Team spirit' renforcé entre bureau PNUD, SNI comme project transversale, et les autres projets

LES PARTENARIATS

Qui doit changer comment pour qu'il y a les changements systémiques

Les acteurs



Observations générales

- Phase de programme 2013-2015, appui trop concentrée sur l'Instance

Priorités pour la période fin 2016 +

- Pour établir les 'systèmes d'intégrité':
 - le soutien devrait être équilibré entre l'INLUCC + gouvernement /rédevabilité social/secteurs
 - Impliquer les autres projets PNUD pour des synergies
- Coordination entre Strategie Nationale + Strategie OGP
- N'oubliez pas les citoyens (hommes/ femmes/ garçons/ filles...); surtout dans l'approche LIS – i.e. les mecanismes d'impliquer les cityoens directement via société civile

RÉSULTATS PRÉVUS

Les résultats



Observations générales

- Maintenant ilss sont des 'outputs', pas 'outcomes' – faut les élever au niveau plus stratégique.
- Autre changements importants ne se voit pas dans le monitoring.
- Plus flexible et lié au contexte.
- L'utilisation (et les utilisateurs) des diagnostics n'est pas claire.

Priorités pour la période fin 2016 +

- Faire le cadre des résultats plus orientée vers les différents acteurs et leurs besoins
- Développer des résultats pour l'appui au Gouvernement (services bonne gouvernance dans les secteurs)
- Stratégie société civile + LIS plus stratégique avec collaboration avec autres projects PNUD, comme l'appui aux processus de la décentralisation.

L'IMPACT: DURABILITÉ, APPROPRIATION NATIONALE & RENFORCEMENT DES CAPACITIÉS

L'impact long terme/ durable



Observations générales

- Concepts ne sont pas bien compris
- Trop ambitieux, mieux d'être plus modeste mais précis

Priorités pour la période fin 2016 +

- Faire un restructuration de programme (cadre de résultats) basé sur les analyses de contexte, valeur ajouté du PNUD, l'efficacité du gestion du projet...
- Intégration de l'approche genre
- Focus sur les jeunes, les régions marginalisés, le participation du citoyens dans la démocratie participative.

Annex III: Recommendations for a revised results framework

This Annex responds to the section of the TORs which calls for recommendations for an updated results framework. As outlined in the report, however, the findings suggest that a complete restructuring of the next phase of the project be undertaken, rather than a ‘tweaking’ of the existing support and results areas. This is particularly pertinent since the current project period is nearing its end.

The recommendations contained below will therefore suggest a process for reformulation, which in turn will determine what the new results framework should look like. Based on the findings in this report, areas for further analysis will be highlighted and some tentative suggestions to be verified during the reformulation phase is also included.

1. Clarify Theory of Change (ToC) with stakeholder inputs

Before the revolution in 2011, the UNDAF for Tunisia emphasized in particular support to national efforts for a management of social services, prevention of vulnerability, improved access to services, and environmental management. In the area of governance, there was also a support programme for the modernization of public services, focusing on e-governance, but with limited results¹. Furthermore, there was a quite strong focus on youth (which is also carried over into the post-revolution context). In the UNDAF covering the 2015-19 period the support to governance has grown substantially to a USD 121 million programme which aims to support the next phase of the transition in key areas including democratic governance, the transition to a sustainable, inclusive and resilient development model and social protection.

It is organized around three main axes with the first one focusing on democratic governance. This is the only programmatic area where anti-corruption efforts are being specifically referred to. Under the first outcome area (first indicator), the integration of international standards into the regulatory frameworks for national institutions, including the Constitutional Commission for Good Governance and Anti-Corruption foreseen in the 2014 constitution, and the Truth and Reconciliation Commission which also receives UNDP institutional support. Other indicators under the same results area (indicator 3, 4), talk about the existence of annual work plans for these identified institutions and the existence of national reform strategies to enhance the rule of law.

The second outcome area under the democratic governance portfolio relates closely to efforts to set up ‘local integrity systems’² by influencing decentralization efforts to include citizen and civil society feedback on service delivery and budget transparency, linked to social accountability. Indicator 5 also talks about the regular use of citizen scorecards and surveys on public services and the existence of institutional mechanisms to ensure citizen participation (indicator 6).

It is notable that the first axis related to democratic governance does not talk specifically about governance and anti-corruption efforts within sectors, but only in more overall terms for institutional support, UNCAC and strengthening the legal framework. Neither does it specifically indicate how cross-

¹ Tunisia Assessment of Development Results, 2012. UNDP IEO

² This concept is being used in the UNDP project particularly dedicated to establishing a National Integrity System.

cutting areas like gender equality will be taken into account or measured. Rather, there is a tendency to focus on ‘citizen engagement’ without breaking it down to women/men or address any aspects related to gender or other socio-cultural barriers that may enable or block participation in local systems for citizen engagement in inclusive governance.

Gender aspects are instead only mentioned in the Axis 2 on inclusive economic growth, referring to a revised Human Development Index that takes gender inequalities into account, and efforts to target young women with diplomas in local job creation. However, it will be important to address a gender balanced approach both to the local systems of inclusion in governance as well as in the local job markets, as the two – i.e. active citizenship in public life and active participation in the labour force -- are often linked.

UNDP typically does not draw up clear ToC:s for its specific projects which are aligned with the UNDAF and country programme support and follows closely partner countries’ priorities. However, in a complex and cross-cutting project like the NIS, a more clearly spelled out ToC could ensure both that UNDP is using the project as a maximum leverage point (alongside other support projects), and that all national stakeholders have a common understanding of how UNDP’s support (i) fits in with those of other donor and UN agencies, and (ii) helps them fulfill their commitments.

In the current NIS project design, it is entirely unclear why certain choices were made over others in terms of project formulation. There is also a mismatch between the rather ambitious objectives set out in the NIS project and the more limited and targeted support provided, without spelling out how this complements other existing donors or national investments in addressing corruption and governance integrity.

More specifically, it is not spelled out in existing project documents ‘*who needs to change how in order for (what) change to happen*’. Instead it assumes that the five results areas will on their own contribute to the establishment of national and local integrity systems without defining the boundaries of these, what they entail, or who are the *main drivers of change* for each. It would also be helpful to explain more clearly what different stakeholders (including UNDP) bring to each of the results areas.

Another important aspect would be to clearly spell out how and to what extent each result area is expected to *contribute to improved outcomes for citizens more broadly* (even if indirectly) – something which at present is not tracked at overall project level or in conjunction with other interlinked projects. As the NIS is moving more firmly into sector work, and in setting up LIS systems which assumes greater civic engagement in public affairs, this would need to be more regularly incorporated and tracked. At this stage of diagnostic work being undertaken, efforts have not yet reached beyond that ‘inner circle’ of stakeholders, which is understandable. Yet in a future phase it would be expected to do so.

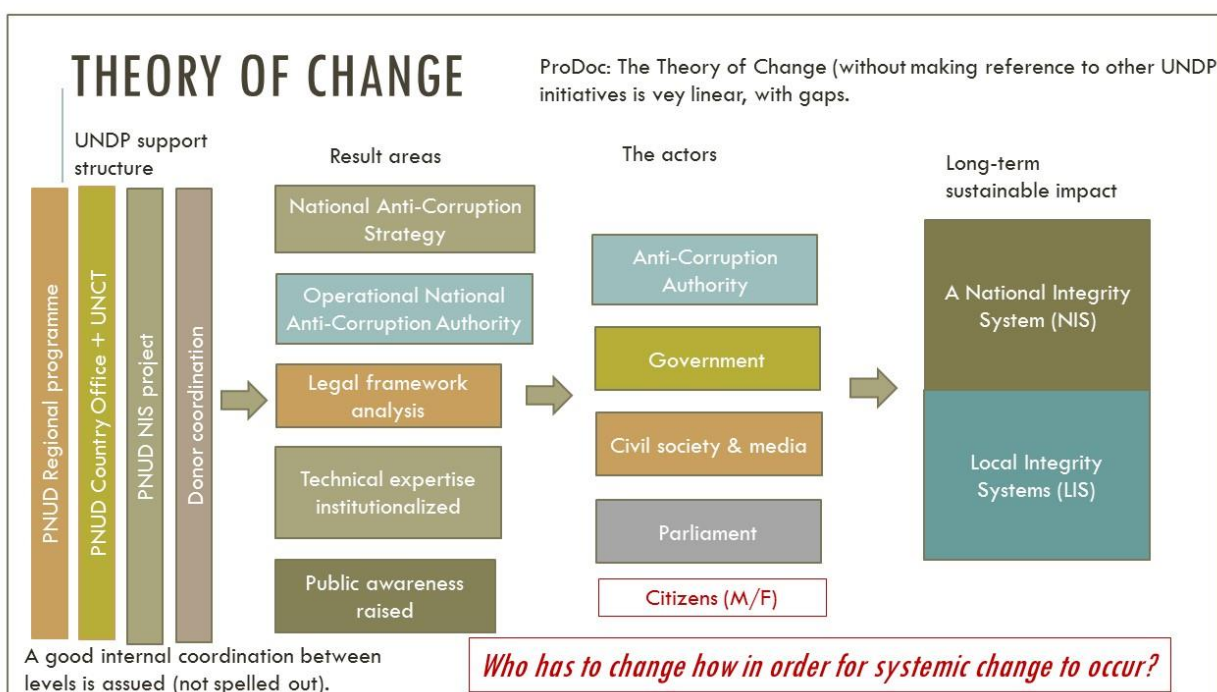
The term ‘national integrity system’ (and ‘local integrity system’ at subnational level) *implies a ‘system’ perspective* whereas this is not clearly spelled out in the programme document. A mapping, detailing different lines of accountability (political, bureaucratic, citizen-led etc.) would make it clearer how the NIS project fills gaps and/or complement others in such a system.

The interlinkages and change theory on how the local integrity system support (LIS) links into and reinforces national level efforts would be particularly pertinent for taking such efforts to scale. Looking at the overall logic of the NIS, it is also difficult to see how these separate result areas connect towards an integrated system (see graph below). Recent efforts (March 2016) to strengthen synergies between different UNDP projects overall across the UNDP Tunisia Country Office³ is a positive recent development, which should be combined with efforts to more regularly monitor and aggregate (if feasible) synergy effects of different projects against the overall governance portfolio and the wider country portfolio.

While it is not in the UNDP programming guidelines to map out full theories of change, it would help to visualize desired effects and how they accumulate (or not) towards broader outcome areas. It would also be helpful to refer to other complementary initiatives, both from within UNDP and other actors to better identify added value and the strategic importance of the interventions.

In current structure of the ProDoc, the results areas are linked to a National Anti-Corruption Strategy (Result area 1) and the operationalization of the National Anti-Corruption Authority (Result area 2). Yet, these results are not in themselves to date achieved, despite intensive investment, due to political blockages and weaknesses in the legal framework. Although a number of activities were carried out, such as consultative processes and drafting efforts, but the results or use of these efforts are less visible.

Figure 2. Theory of Change of the National Integrity System (NIS) project



³ Initiated by the Deputy Resident Representative.

2. Spell out learning objectives

The results frameworks and ongoing monitoring could be further enhanced by more clearly spelling out the different learning objectives for each results area. This is particularly important since the NIS project typically invests in capacity building and the sourcing of international experts to feed into different processes (such as drafting laws, elaborating the national anti-corruption strategy etc.). While national stakeholders may not have the capacity or the time to undertake this work themselves, such ‘externalized’ processes are, with frequent consultations, also meant to create the necessary buy-in and learning by those who are supposed to take it forward (getting it through parliament, or implementing it etc.).

At the same time, there is always a risk that by outsourcing the ‘doing’, the ‘learning-by-doing’ is also outsourced, and thus ownership may not be sufficiently transferred to the relevant domestic actors who are in the driving seat. Feedback indicated that this may have been the case occasionally in the NIS project, particularly when there was internal disagreement on which experts to source, and/or when experts were sent from the regional project without much input from the client.

Moreover, in the current results framework, knowledge transfer and ‘institutionalization of expertise’ – which in part included a number of exchange visits and participation in international conferences, is grouped together under one results heading without being linked more closely to specific outcomes. Even though this component was treated as a cross-cutting issue in practice, it makes it difficult to link learning (by the relevant actors) to concrete changes in attitude or behaviour that is possible to monitor and assess.

Rather, the lack of clear ownership and disputes over experts seem to lead to some delays and a low level of buy-in at times. That means that even if a certain strategy or document was produced as outputs, there is no one behind it to drive its implementation. The current results framework does not report on this. Neither is there any effort to systematically track uptake and use of knowledge following specific capacity building support beyond standard satisfaction surveys immediately following a specific training. Any future results framework would need to try to the extent possible to truly mainstream the learning component and to track the extent to which such knowledge is truly institutionalized and used.

3. Niche mapping: NIS added value and unique contribution

As mentioned above, there is scope to more explicitly map out linkages between NIS (described above) and other governance or sector-specific projects of UNDP, such as for instance ongoing support to the justice or security sector reforms or to decentralization and inclusive employment generation. This would make it possible to track the overall UNDP contribution in this area. Also it would make it possible to more clearly identify how the NIS project – aimed at strengthening overall national and local integrity systems – could be used as a complement or an additional *overlay to connect the dots* between separate parallel projects in terms of enhanced governance integrity. It could also be used to develop and test what mechanisms of engagement across government, civil society and individual citizens would be conducive for implementing and staying accountable to national reform efforts on the ground in different contexts.

Some examples of potential linkages that could be (or have been) further explored between the targeted NIS project and other UNDP projects interviewed during this (and previous) evaluations include:

- *Electoral support:* There is no active support project in this area. However, the mechanisms of *political accountability*, from non-coerced citizens through to elected politicians could be explored. Earlier UNDP efforts in this area also looked at political patronage systems from e.g. a gender angle with concrete measures taken to increase the number of female elected politicians by having every second candidate on the party list be a woman. Breaking up established systems of political patronage (often male-dominated) is also a way to break away from networks that could be more prone to corrupt practices. *Electoral process finance, and financing of political parties is another area that could be covered from an anti-corruption and governance integrity angle.*
- *Parliamentary support:* Also linked closely to the area of political accountability are linkages *between elected parliamentarians and their constituents*. Trainings and involvement of Parliamentarians in the UNCAC self-evaluation and following legal projects have been used via the NIS project. In collaboration the Parliamentary Support project, the development of an Ethical Code for Parliamentarians has also been discussed which will include aspects of anti-corruption. This could be an important learning tool to internalize some critical concepts related to what is 'corrupt' and what is 'acceptable' behaviour for an elected representative, and *the outcomes of such cross-project collaborations could be monitored as part of the NIS results framework.*
- *Transitional Justice Project:* The linkages between prosecuting grand scale corruption cases and other rights violations taking place under the previous regime has clear and obvious linkages to the ingrained system of corruption that exists in Tunisia today. There has also been an active collaboration and information exchange between the NIS project and the Transitional Justice Project to make sure that e.g. the case handling systems are aligned, and that information is shared between the Truth and Reconciliation Commission and the National Anti-Corruption Authority. E.g. the case handling information system installed at the Anti-Corruption Authority (paid for by the project) is compatible with the one – also supported by UNDP- for the Truth And Reconciliation Commission as some cases may have to be transferred to one institution to the other. Support to the elaboration and implementation of a Justice Sector Strategy could also seek to identify and regularly monitor its *effects on anti-corruption or governance integrity outcomes with active links to efforts to enhance bureaucratic accountability under the NIS.*
- *Security Sector Support project:* UNDP is in the rather unique position (alongside UNODC at a more technical level) to have long-time established working relations with the Ministry of Interior for a reform of the security sector. Efforts, in particular in relation to community policing, would lend itself to a mainstreamed anti-corruption and governance integrity component, where effects are systematically monitored and tracked by citizens themselves. This would be highly relevant in the national context since the police, and security services more broadly, are perceived among citizens to be among the most corrupt. The project has also been involved in developing an *Ethical Code of Conduct for the Security Forces*, including the police.

The implementation of this Code, which *includes integrity and anti-corruption as one of two main components* (the other being human rights), the non-acceptance of bribe or other forms of extortion, would be an opportunity to collaborate with more ‘systemic’ efforts to support local integrity systems.

It could also be an entry point for introducing a dialogue and sensitization of officers around the issue of ‘sextortion’ – i.e. *the demand for sexual favours in place of monetary bribes*, and to get a better sense of the extent to which this is prevalent, making sure that this is included as a form of corruption. A more thorough *sector study on the risks for corruption in the security sector* would be useful to guide this work, to identify entry-points for connecting it to a sectoral focus under the next phase of the NIS, and – importantly, to more clearly define relevant indicators to specifically monitor the prevalence of different forms of corruption among security sector personnel.

- *Support to decentralization, and inclusive economic growth at the sub-national level:* At the sub-national level there are clear linkages to be made between on the one hand UNDP’s anticipated support to decentralization and local development (still in its inception phase) and the part of the NIS project that seeks to support Local Integrity Systems. The diagnostics work for this is still being piloted in two municipalities, led by civil society consortia, with the scope to link up this effort with other ongoing project under a second support phase after the end of this project in mid/end 2016.⁴ Likewise, closer links could be made between the NIS and already established project support to local economic development and employment creation, targeting particularly youth in the same municipality of Zarzis in Médenine.

This could seek to *introduce and mainstream an anti-corruption component, monitoring in particular the level of transparency and traceability of applications for applications to municipality-sponsored internships and voluntary work in public services*. Established relations with the Office of the Development for the Southern Regions could be used to collaborate around transparency efforts, linking it into efforts to set up systems for local engagement.

- *Civil Society Support Project:* As the new phase of the UNDP Civil Society Support Project is under way to be developed, and as the NIS project is just in the stage of planning its strategy of engagement with civil society, there is plenty of scope for even further deepening the already existing collaboration and joint management of civil society grants between the NIS project and the Civil Society Support Project. The Civil Society Support Project has set up procedures of grant management, mentoring, and M&E mechanisms that could be used across projects in order to benefit from the ‘economy of scale’ in streamlining grants management and capacity building efforts.

Building on this project’s track record in carrying out rigorous studies, drawing on a broad sample of CSOs across thematic areas, closer links with this initiative would also allow for a more contextualized understanding and inputs into developing a civil society engagement strategy on

⁴ The formal end of the project is in June 2016, but may be extended through a non-cost extension until the end of 2016.

issues related to corruption, transparency and social accountability across sectors. The NIS project should explore, in its future results framework, to *monitor and assess the contribution of civil society – particularly as to how it represents and widens citizen voice and inclusion in national and local dialogue efforts on corruption.*

4. Clearly spell out internal UNDP mechanisms for coordination and support

The way UNDP operates at country level assumes that UNDP's internal coordination and support to partners is clear, while in fact, the architecture between different layers of support and processes was often unclear to partners and even caused confusion internally. The role division between UNDP's country and regional level support seemed to sometime cause friction for the lack of clearly spelling out and explaining how it works and who is responsible for what.

For instance, partners were often unclear of which processes they could / could not influence (e.g. whose responsibility it was to select regional experts being called in to advice on a particular process or law formulation). Partners also noted that the regional UNDP anti-corruption project sometimes went 'directly' to their own government contacts without passing through the UNDP country programme or informing the UNDP NIS project partners about it – again causing some friction.

During the formulation of the next phase of the NIS project, it would therefore be advisable to coordinate more closely with the regional UNDP Anti-Corruption and Integrity project (based in Beirut, Lebanon) on how to align objectives and monitoring indicators in areas where the regional project is expected to feed in and add value.

5. Tentative framing of new results areas

In the first phase of the project, the results framework was centered on five distinct results areas:

- Result 1: National anti-corruption strategy and an action plan developed;
- Result 2: Tunisian Anti-Corruption Agency (TACA) operationalized;
- Result 3: Diagnostic reports on the existing anti-corruption legal frames developed;
- Result 4: Anti-corruption, transparency and accountability knowledge institutionalized;
- Result 5: Public awareness on anti-corruption and transparency and accountability increased.

Depending on the outcomes of a more thorough project restructuring suggested as a key outcome of this MTR, a possible re-clustering of results areas could be more actor-specific, linked to key behavioral or performance-related changes that the project wishes to promote:

Result area 1: The **National Anti-Corruption Authority** has gained domestic legitimacy as a vibrant and effective actor.

- *Sample activities:*
 - Capacity strengthening to implement relevant aspects National Anti-Corruption & Good Governance Strategy,
 - Citizen outreach – particularly at the sub-national level with a focus on women, youth and via civil society,

- Case handling systems in place and effective.
- Support to ‘special reports’ with actionable agendas to feed into national policy dialogue

Result area 2: The **Government’s good governance architecture and internal coordination mechanisms** are strengthened across sectors and national plans of action (the National Strategy for Good Governance and Anti-Corruption, the OGP National Action plan etc.), with an emphasis on education and health.

- *Sample activities:*
 - Technical support and capacity building related to the implementation of National Action plans in two pilot sectors (health, education)
 - Tracking mechanisms established and used for implementation-oriented learning
 - Knowledge generation involving State and civil society actors, including gender disaggregation of data and focus on gendered dimensions of corruption in health and education services.

Result area 3: Anti-corruption and governance integrity is mainstreamed across efforts to support Tunisia’s **decentralization** enhancing local budget transparency, security sector reform, access to employment and social cohesion measures. (Drawing on experiences in two focus regions where UNDP is present).

- *Sample activities:*
 - Technical support to local multi-stakeholder dialogue fora, linking local integrity action plans to ongoing programs and funding opportunities
 - Incorporation of integrity and anti-corruption measures in local public sector reform initiatives (security sector, budget transparency, access to employment / youth employment)
 - Support to channeling citizens voice into ongoing local accountability efforts with attention to ensuring voice of the most marginalized in line with social cohesion agenda

Result area 4: **Oversight actors**, including Parliament, **civil society** and **media** are enabled to internalize and use anti-corruption tools and concepts in their ongoing roles of engaging citizens and constituents in holding public actors to account and engaging in transforming the discourse around accountability to be more action-oriented, linking citizen-generated data and perspectives to local and national dialogue.

- *Sample activities:*
 - Support to the establishment of an Ethical Code for Parliamentarians (underway) and support to its use and implementation (with the aim of Parliamentarians reflecting on their own accountability and roles as constituent representatives)
 - Small grants (via UNDP’s Civil Society Support facility) and capacity-building support to a number of actors at sub-national level and in marginalized areas
 - Investigative media training
 - Capacity-building in better use of citizen feedback and citizen-generated data

Result area 5: **Donor coordination** enhanced in collaboration with national partners

- *Sample activities:*

- Support to quarterly donor coordination meetings and regular knowledge sharing across donors and national partners (including gradual transfer of Anticor.tn to national counterparts).
- Mapping and liaison with donors active in other sectors, with a focus on health and education, in order to mainstream and liaise in relation to Results area 2.
- Increased internal coordination and communication between UNDP (national, regional) and national partners, with feedback on the partnership's performance during Project Steering Committee meetings.

Annex IV: Note on Gender Equality integration

This Mid-Term Evaluation has particularly looked at how gender equality could be further enhanced across the project (see above and section 7). A clear limitation has been the fact that gender has so far not been emphasized or taken extensively into account in any of the project documentation or in the diagnostics conducted to date. There was no gender analysis at sector level that was actively referred to.

A gender equality report for UNDP Tunisia was compiled in Sep 2013, but this report only refers to ‘anti-corruption’ very marginally in relation to the specific Call for Proposals that the CSO facility issued, and not to the anti-corruption project or area of work at all.

Likewise, diagnostic studies – although they went beyond what was even initially envisaged in terms of drafting of laws in the national framework – did not seem to have included a more detailed political economy analysis of the national context, particularly as it pertains to addressing the public’s perceptions, particularly those of youth. Thus, there was no clear programmatic follow-up to this in the NIS programme (except for smaller ad hoc grants in a few cases).

Although the NIS project sought to implement a *gender sensitive* approach in terms of equal participation, it was not systematically built into the programme in a way that had the potential of being more *transformative* in nature, reflected in intermediary outcome objectives. As pointed out above, the extensive use of ‘citizens’ as a term for beneficiaries, sometimes masked a more nuanced break-down e.g. based on gender and cultural barriers to participation in civil oversight mechanisms or outreach efforts. On a scale from zero (0) to 3 in terms of ‘Gender Marker’ on how much of the budget allocation in the NIS project was specifically dedicated to gender equality, the NIS project consistently scored a 1⁵. The low attention to gender mainstreaming and tracking in the anti-corruption area is not unique to Tunisia.

The IEO Global Thematic Evaluation on Gender Equality and Women’s Empowerment (2015) found from recorded ROAR data that the ‘needs orientation’ – addressing gender from a responsive rather than a transformative angle – was dominant across the area of democratic governance portfolio, especially in relation to local service delivery and accountability programming. Moreover, in the field of democratic governance support overall, the lowest level of gender results was found in relation to information and transparency policies as well as other linked anti-corruption work as compared to other programmatic themes in the democratic governance portfolio.⁶

In the mid-term review of UNDP’s 2008-13 Gender Equality Strategy, one of the conclusions were that UNDP’s “*investment in the political participation of women at all levels throughout the governance cycle yields returns*” but that gaps still remained in the areas of public administration, local governance, human rights and anti-corruption. A recommendation was to continue to pay attention to consistency between customary laws and information mechanisms and international norms and standards.⁷

⁵ Input into Tunisia Case Country for the IEO Thematic Gender Evaluation, 2015.

⁶ UNDP IEO. 2015

⁷ UNDP. ‘2008-2013 Gender Equality Strategy Mid-Term Review’, UNDP, New York 2011

In the 2013-17 UNDP Gender Equality Strategy (GES) the integration of a gender dimension to the overall UNDP strategy was being made mandatory. Gender and anti-corruption does not feature very strongly. In fact, it is only indirectly mentioned only under Outcome area 3 which focuses on *“the capacity of institutions to lead the development process and deliver justice, security and other basic services to all women and men, including the most marginalized.”* In this context, it links interventions to women’s access to services including health, social protection, security and HIV with an emphasis on equitable engagement in the prioritization and provision of local services. Furthermore, it specifies that this includes supporting women’s groups in developing and leading anti-corruption initiatives – something which does also take place under the NIS project.

Without a detailed gender sector analysis (for the entire governance portfolio and/or specifically for the area of anti-corruption and good governance aspects covered by NIS), it is difficult to have a nuanced understanding of how to make interventions more gender transformative, with corresponding indicators to monitor progress. Global studies e.g. on gender and public administration indicates that *“corruption along the route to power reinforces those already in power – and in most contexts where corruption is prevalent, those in power are men.”*⁸ This study of corruption in civil service and administrative reform, also touches on the prevalence of the exchange of sexual services in order for women candidates to access particular jobs. The phenomenon of ‘sextortion’, also referred to above, also recognizes the potential prevalence of non-monetary bribes when women who are unable to pay other forms of bribes are instead asked for sexual services.

In the NIS project, the result areas have to date been less linked to these types of interventions, but it could be picked up on if a next phase of the NIS project were to work more closely e.g. with local integrity in service delivery, and barriers for youth (and young women) to access employment. Another potential area where gender differences are clear and linked to different forms of corruption are in the area of human trafficking and in situations of fragility with a high influx of refugees. UNDP could explore how to work more closely with UNODC to incorporate addressing these forms of extortion, particularly in border areas. Inspiration could also be found in the 2012 UNDP report where grassroots women’s perception of corruption, particularly in public services is being explored.⁹

The ten key findings and a summary of the recommendations are outlined below:

Finding 1: Grassroots women describe corruption in terms of specific misuses of power. The report calls for an expanded definition and understanding of corruption to include physical abuse, sexual exploitation and the abuse of power as it relates to the delivery (or non-delivery) of public services.

Finding 2: Women’s definition of corruption varies by region and location. Because of differences in perceptions of corruption at national vs. the local level, it is important to include also grassroots women in defining national debates and policies.

Finding 3: Women view all public agencies as corrupt. There is a lack of information on how they can monitor and influence institutions to start building trust between service users and providers, with a

⁸ Gender Equality in Public Administration, UNDP, 2014.

⁹ ‘Seeing beyond the State: Grassroots Women’s Perceptions on Corruption and Anti-Corruption’, UNDP, New York, 2012.

special need for outreach to grassroots and poor women. The report also recommends establishing safe spaces for women to report corruption with clear channels for redressing incidents.

Finding 4: Although there might be differences in where and how they experience bribery, it is part of everyday life for both grassroots men and women. Partnerships around localized action is therefore recommended, with a raised awareness about bribery's different impact on men and women's everyday life.

Finding 5: Bribery occurs not just in basic service delivery but in all areas of engagement with public agencies. Recommendations include supporting women-led citizen monitoring groups, with public registration days for births, marriage certificates etc. that increases the openness and transparency of what were previously private transactions.

Finding 6: The burden of bribery falls most heavily on women of caregiving age. Special effort should be made to pay attention to this group who is most heavily dependent on public services and support during a particular time in their life.

Finding 7: Grassroots women perceive group-affiliated leaders to be more accountable. Direct dialogue and engagement with local government, local elected leaders, and in any national commissions to draft anti-corruption treaties and national legislation.

Finding 8: Organized women are empowered to fight corruption. Investment in women's community organizing and leadership is recommended.

Finding 9: Women's anti-corruption initiatives are relevant to local and political contexts. Contextualized, locally led initiatives to fight corruption in the context of existing inequalities (such as gender inequality) stands the largest chance of getting to the roots of the social patterns behind wide-spread corrupt practices, and should be sufficiently invested in.

Finding 10: Capacity building of women's groups and fighting corruption should go hand in hand. Programs that develop women's legal expertise, as well as their expertise around rights and entitlements should be prioritized.

Overall, the findings and recommendations call for a broader view of women's 'terms of engagement' with public institutions, rather than maintaining a very specific focus on services. They also stress the 'empowerment agenda' as being both context-specific and worth investing in so that women can self-organize and mobilize as part of the broader anti-corruption response.

In Tunisia (see also section 7 of the main report), during the transition phase immediately following the revolution, there were considerable efforts to promote women's inclusive engagement in electoral and political processes at national and local levels through various UNDP support projects. Small grants to newly formed associations – many of them led by women – combined with ongoing mentoring and inclusion in National Dialogue efforts provided for new channels for women to participate in civic life beyond the established party structure. Though the capacity-building facility, they were also provided with orientations and dialogue opportunities on the topic of corruption.

The concerted efforts to include women and youth, and to maintain a strong gender equality angle in the constitutional and electoral support projects leading up to the 2014 Constitution and election later that year has, in part, been attributable to having had specific gender expertise on staff or called in as

technical expertise to guide project implementation. In-country expertise was complemented with additional gender technical support from UNDP Headquarters (Gender Office).¹⁰

Other projects, such as the support to the transitional justice process also made an effort to mainstream a gender perspective during 2012-13 during consultations with both state and non-state stakeholders leading up to the adoption of a Strategic Plan for the Ministry of Justice.¹¹ The plan emphasized the need to actively involve citizens and citizen representatives (civil society) to increase dialogue and strengthen links and confidence between citizens and the justice system. Civil society organizations representing women's rights or gender equality were part of the consultative process. In the plan, they are not singled out as such, but based on the consultative process, can be assumed to be included. However, while 'citizens' are being referred to in general terms, there is no reference to a breakdown of such citizens to ensure equal and inclusive participation. The results framework also does not at any level refer to gender equality or women's rights, but puts as a concrete action "training sessions on the international instruments in relation to international human rights law and processes for equitable justice and juvenile justice." There is no reference to the need to collect gender disaggregated data and capacity to undertake analysis by gender.¹²

Likewise, there have been efforts to consistently include CSOs working on women's rights or economic empowerment in the dedicated anti-corruption project initiated by UNDP in 2012, the National Integrity Systems project (including around UNCAC at the regional level) and more targeted capacity-building efforts on anti-corruption issues. One of the six ongoing civil society grants geared towards public outreach and sensitization on corruption is also being implemented by a group working on capacity-building and training of women in Sfax (sub-national level).

There was however no specific gender analysis carried out by the project, or by UNDP for the governance portfolio more broadly that could take such support beyond just input indicators around level of women's participation to monitor more consistently transformative gender equality outcomes.

Diagnostic tools, such as the ones developed by Transparency International that are being applied in the evaluation of local integrity systems in two pilot municipalities currently do not gender disaggregate the data or use it in its analysis.¹³ Rather there is a tendency to use the word 'citizens' without further analysis of who these citizens are (or should be targeted) – whether they are the constituents of specific CSOs, specific service users, or a more randomly selected sample. Yet, each set would come with its own selection bias, with the risk of leaving out non-service users or women with less possibility to engage in civic matters and public meetings locally, depending on the local context.

UNDP has done previous work in this area, around women's access to information and e-governance, with a publication drawing on some practical examples already back in 2008¹⁴. It recognized that women are more likely to have limited access to ICTs and might confront lower levels of connectivity, thereby limiting their ability to benefit from e-government services. Efforts to help overcome such hurdles are also described through e.g. multipurpose community centers or dedicated networking spaces for women

¹⁰ UNDP Gender Evaluation 2015, Tunisia case.

¹¹ Republic of Tunisia, Ministry of Justice. Strategic Plan 2012-16.

¹² UNDP Gender Evaluation, 2015. Tunisia case.

¹³ Based on documents and field visit to observe LIS support in the municipality of Zarzis, Médenine Governorat.

¹⁴ Gender Responsive E-Governance: Exploring the Transformative Potential. UNDP, 2008.

where internet access and training on e-government services are also available. Although there may be some progress since 2008, the 2016 World Development Report on Digital Dividends concludes that nearly 60 percent of the world's people are still offline and can't fully participate in the digital economy, with persistent divides across gender, geography, age and income dimensions.¹⁵ Even for those who can access information online, the link between women's access and their ability to act on the information in the given cultural context should, however, not be overlooked.

While the inclusion of women's associations is always part of any engagement effort in the NIS project, just as the project has always insisted as far as possible on a gender balance in missions and panels, it would be good to commission a more nuanced gender analysis focusing on both gender inequalities as a driver of corruption, and how corruption may affect gender unequal development outcomes. In a redesign of the ProDoc and results framework for the next phase of the project, there should also be an effort to more consistently provide gender segregated data and a gender analysis of the different broad outcome areas. Previously, UNDP has for instance brought in CAWTAR (The Center of Arab Woman for Training and Research) as a strategic partner to provide ongoing advice to mainstream gender equality and women's participation in water governance. With sectoral studies being planned for both the health and education sector as well as a roll-out of the LIS work, this is particularly timely for a second phase of the NIS project.

There are also clear opportunities – which are to date not pursued – on integrating a stronger gender perspective into the work to reform the security sector, such as in the Ethical Code for police officers. In relation to corruption this should include the notion of 'sextortion', i.e. the demand for sexual favours instead of money, as a form of corruption. Amnesty International have also reported that 'sextortion' also has been associated with the Syrian refugee crisis with women being groped or pressured to have sex by smugglers, security staff or other refugees.¹⁶ With a current influx of refugees in Tunisia, many on transit towards Europe, it would be a highly relevant topic to address in current support to Security Sector Reform efforts.

"The term 'sextortion' was coined by the International Association of Women Judges and refers to the abuse of power to obtain a sexual benefit or advantage. It is a problem all over the world with far-reaching costs in terms of physical and mental health and human dignity. Sextortion exacerbates gender inequality and hampers a woman's development. It violates a woman's right to protection against sexual harassment, degradation and discrimination."

Source: Transparency International, 7 March, 2016
http://www.transparency.org/news/feature/sextortion_undermining_gender_equality

In order to incorporate gender meaningfully into the results framework, it is recommended that a gender analysis is undertaken across the governance portfolio with an emphasis on actionable aspects in relation to gender transformative approaches to anti-corruption work. Such analysis should also link into a broader political economy analysis and aspects related to youth and social cohesion as also referred to in the main report.

For specific areas of support, see also suggestions for a tentative framing of a new results framework outlined above (Annex III, Section 5: Recommendations for a revised results framework).

¹⁵ World Development Report 2016: Digital Dividends, World Bank.

¹⁶ <https://www.amnesty.org/en/latest/news/2016/01/female-refugees-face-physical-assault-exploitation-and-sexual-harassment-on-their-journey-through-europe/>, Accessed on 8 March, 2016.